



## Aliso Canyon Turbine Replacement Project Construction Non-Compliance Report

<b>Incident Date:</b>	<u>November 8, 2014</u>	<b>Report No.:</b>	<u>NCR-01</u>
<b>Date Submitted:</b>	<u>March 24, 2015</u>	<b>Location:</b>	<u>San Fernando Substation, Bishop Alemany High School</u>
<b>Level:</b>	<u>Level 2 NC</u>	<b>Relevant Plan/Measure:</b>	<u>APM NS-1/SCE Noise Control Plan, APM TT-1/SCE Traffic Control Plan, MMCRP, MPR-A</u>
<b>Current Land Use:</b>	<u>Disturbed (substation, school)</u>	<b>Sensitive Resources:</b>	<u>Sensitive Noise Receptors</u>

### Description of Incident:

SCE submitted a draft Traffic Control Plan for San Fernando Substation (required by APM TT-1) to the E & E/CPUC team on September 26, 2014. The draft Traffic Control Plan included comment bubbles indicating outstanding details that SCE was still finalizing. E & E determined that the draft should be revised to include a record of coordination with the school adjacent to the substation, Bishop Alemany High School, and the outstanding information should be completed.

NTP-A and MPR-A were issued by the CPUC to SCE on October 28, 2014 with the following condition of approval (COA):  
"Prior to initiating work at the San Fernando substation or in the Wiley Canyon area of the City of Santa Clarita, SCE must submit to the CPUC and receive approval of the Traffic Control Plan for SCE project components."

SCE submitted a record of coordination with Bishop Alemany to E & E/CPUC on Friday, Nov. 7 at 12:30 pm. Claire Hodgkins (E & E) emailed SCE the same day at 6:17 pm, approving the school coordination record but stating that a completed, revised Traffic Control Plan still needed to be submitted per the COA for MPR-A and NTP-A.

SCE began construction activities at San Fernando Substation on Saturday, Nov. 8 at 6:00 am. Below is a timeline of construction-related events that occurred according to SCE's construction records:

6:00 a.m. – Drill rig and crane arrived at San Fernando Substation; metal plates (used under the equipment to dissipate weight) delivered to San Fernando Substation  
6:30 a.m. to 6:45 a.m. – Daily tailboard meeting  
7:00 a.m. to 8:05 a.m. – Metal plates were moved, via forklift, to the areas where equipment would be staged  
~ 8:05 a.m. – SCE Environmental Coordinator contacted SCE Construction Site Manager to stop all activities  
~ 8:05 a.m. to 10:30 a.m. – Work stopped  
10:00 a.m. to 11:00 a.m. – While work was stopped, the re-bar cages and concrete truck deliveries that were already en route to the San Fernando Substation were delivered  
10:30 a.m. to 2:30 p.m. – Work resumed after SCE Environmental Coordinator contacted SCE Construction Site Manager following approval of the traffic access plan by CPUC; drilling began  
2:30 p.m. – Drilling completed  
2:30 p.m. to 5:00 p.m. – Installed re-bar cages and concrete pour  
5:00 p.m. to 6:00 p.m. – Hand troweled concrete to smooth out the concrete  
6:00 p.m. to 8:00 p.m. – Site cleanup and removed equipment offsite

On Saturday, November 8, at 7:31 am, Lara Rachowicz (E & E) re-emphasized Claire's message from her Friday, November 7, 6:17 pm email that construction could not proceed without an approved Traffic Control Plan. At approximately 8:15 am, Christine McLeod (SCE) contacted Lara Rachowicz (E & E) about the email from 7:31 am. SCE halted work at San Fernando



Substation at approximately 8:15 am until the Traffic Control Plan was sent to and approved by the CPUC/E & E team. SCE received CPUC approval of the plan at 10:23 am in an email from E & E (Claire Hodgkins) and work was authorized to begin at San Fernando Substation.

**Pertinent Plans/Permits/Mitigation Measures:**

- APM TT-1 requires SCE to prepare and implement Traffic Control plans to minimize short-term construction-related impacts on local traffic and potential traffic safety hazards at project components. The plan must be finalized and approved by CPUC prior to construction. By beginning construction without an approved Traffic Control Plan, SCE violated APM TT-1.
- NTP-A and MPR-A authorized SCE to construct the project components at San Fernando Substation with the condition that the Traffic Control Plan for the substation be approved by the CPUC before construction activities began. By beginning construction without an approved Traffic Control Plan, SCE violated the conditions of approval in NTP-A and MPR-A.
- City of Los Angeles noise regulations (Ord. No. 166, 170) state that no construction work may occur within 500 feet of residential buildings before 8:00 am or after 6:00 pm on any Saturday or national holiday nor at any time on a Sunday. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specified. By beginning construction activities and by delivering construction materials to the job site within 500 feet of residential buildings before 8:00 am and continuing after 6:00 pm on a Saturday, SCE violated Ord. No. 166, 170.
- APM NS-1 and SCE's Noise Control Plan commit to following the construction hours permitted by local regulations. City of Los Angeles regulations apply to the San Fernando Substation project component. By failing to comply with the City of Los Angeles' Ord. No 166, 170, SCE violated APM NS-1 and the Noise Control Plan.

**Proposed Resolution:**

- E & E held a conference call on Wednesday, November 12 with SCE (Regulatory, Policy & Affairs Representative, Environmental Coordinator, Project Manager) to discuss compliance expectations and procedures and to detail all outstanding compliance documentation. The SCG Environmental Coordinator was also invited and attended the call.
- E & E requested an incident report from SCE about the events on Saturday, November 8. SCE's incident report is attached (Attachment 1).
- SCE committed to increased oversight by SCE management to help ensure compliance with the MMCRP.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	11/21/14	Lara Rachowicz		
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)	3/24/15	Andrew Bamsdale		
SoCalGas/SCE Environmental Compliance Manager (if applicable)				

Prepared by: Lara Rachowicz

Date: 11/21/14

# ATTACHMENT 1

SCE's Incident Report

# Aliso Canyon Turbine Replacement Project

<b>Incident Date:</b>	<u>11/8/14</u>	<b>Report No.:</b>	<u>1</u>
<b>Date Submitted:</b>	<u>11/12/14</u>	<b>Location:</b>	<u>San Fernando Substation</u>
<b>Level:</b>		<b>Relevant Plan/Measure:</b>	<u>APM NS-1, SCE Noise Control Plan, and APM TT-1</u>
<b>Current Land Use:</b>	<u>Existing Substation</u>	<b>Sensitive Resources:</b>	<u>None</u>

**Description of Incident:**

SCE submitted a draft traffic access plan to the CPUC on October 26, 2014. This plan supports the project activities at the substation; however, the draft version included several items for which the CPUC sought additional information.

On Friday, November 7 at 6:18 p.m., SCE's Regulatory, Policy & Affairs (RPA) representative on SCE's ACTR Project and SCE's Environmental Coordinator for the ACTR Project received an email from Claire Hodgkins of E&E stating that outstanding items on the San Fernando Substation draft traffic access plan needed to be resolved, and a revised traffic access plan submitted to and approved by the CPUC prior to work beginning at San Fernando Substation. This was confirmed by Lara Rachowicz of E&E in an email sent to SCE on Saturday, November 8, at 7:31 a.m.

On Saturday, November 8, at approximately 7:58 a.m., SCE's RPA representative contacted SCE's Environmental Coordinator regarding work at San Fernando Substation and the need to revise the traffic access plan prior to work beginning per the email from E&E. The Environmental Coordinator immediately (within 2 minutes) contacted SCE's Construction Site Manager, and communicated to him that work at the San Fernando Substation was not to start until such time as the traffic access plan had been revised and approved by the CPUC.

Over the next hour, SCE's RP&A representative worked with SCE's Construction Site Manager to resolve the remaining issues in the traffic access plan, and coordinated with the CPUC's representatives regarding revision of the traffic access plan. At approximately 10:19 a.m., SCE's Environmental Coordinator emailed the updated traffic access plan to E&E. Claire Hodgkins (E&E) emailed SCE's RP&A representative and SCE's Environmental Coordinator at 10:23 a.m. to confirm that the revised traffic access plan had been reviewed and approved by the CPUC, and that work could commence at San Fernando Substation.

Below is a timeline of construction-related events that occurred at San Fernando Substation on Saturday, November 8:

- 6:00 a.m. – drill rig arrived at San Fernando Substation
- 6:00 a.m. – crane arrived at San Fernando Substation
- 6:00 a.m. – metal plates (used under the equipment to dissipate weight) delivered to San Fernando Substation
- 6:30 a.m. to 6:45am. – Daily tailboard meeting
- 7:00 a.m. to 8:05 a.m. – Metal plates were moved, via forklift, to the areas where equipment would be staged
- ~ 8:05 a.m. – SCE Environmental Coordinator contacted SCE Construction Site Manager to stop all activities
- ~ 8:05 a.m. to 10:30 a.m. – Work stopped
- 10:00 a.m. to 11:00 a.m. – While work was stopped, the re-bar cages and concrete truck deliveries that were already en route to the San Fernando Substation were delivered
- 10:30 a.m. to 2:30 p.m. – Work resumed after SCE Environmental Coordinator contacted SCE Construction Site Manager following approval of the traffic access plan by CPUC. Drilling began.
- 2:30 p.m. – Drilling completed.
- 2:30 p.m. to 5:00 p.m. – Install re-bar cages and concrete pour.
- 5:00 p.m. to 6:00 p.m. – Hand trowel concrete to smooth out the concrete.
- 6:00 p.m. to 8:00 p.m. – Site Cleanup and remove equipment offsite.

**Pertinent Plans/Permits/Mitigation Measures:**

- APM NS-1
- SCE Noise Control Plan
- APM TT-1

**Proposed Resolution:**

Work was halted until the outstanding traffic plan items were finalized, reviewed and approved by the CPUC.

**Recommended timeline for follow-up:**

Resolution was addressed immediately with the CPUC.

**Prepared by:** Christine McLeod, SCE RP&A Representative

**Date:** November 12, 2014

Non-compliance Level	Description	Example
<p>Level 1 (Clarification/Correction Required) Level 1 should only apply to those actions that do not cause immediate risk to environmental resources.</p>	<p>Activities that result in a partial implementation of the mitigation measures and require minor clarification of mitigation measures requirements</p>	<ul style="list-style-type: none"> <li>i. Initial inadvertent failure to implement adequate dust control measures resulting in no impact on resources;</li> <li>ii. Minor inadvertent hazardous material/fuel release resulting in no impact on resources;</li> <li>iii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters);</li> <li>iv. Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources;</li> <li>v. Use of an existing unapproved access road (first offense);</li> <li>vi. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot</li> </ul>
<p>Level 2 (Minor Incident) Level 2 should apply to those actions that have the potential to cause or cause immediate, minor risk to environmental resources.</p>	<p>Activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impacts to resources</p>	<ul style="list-style-type: none"> <li>i. Work without appropriate permit(s);</li> <li>ii. Failure to properly maintain an erosion or sediment control structure, but the structure remains functional, and results in minor impacts on resources (e.g. water courses);</li> <li>iii. Brush clearing outside the approved work limits with no impacts on sensitive resources;</li> <li>iv. Repeated documentation of Level 1 incidents</li> </ul>
<p>Level 3 (Major Incident) Level 3 should apply to those actions that have the potential to cause or cause immediate, major risk to environmental resources.</p>	<p>Major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 (Minor Incident) events</p>	<ul style="list-style-type: none"> <li>i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site;</li> <li>ii. Eminent danger or documented impact to a sensitive or T&amp;E species;</li> <li>iii. Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents);</li> <li>iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk;</li> <li>v. Grading, foundation, or line work without required biological preconstruction surveys or a biological monitor on site;</li> <li>vi. Use of new access roads, staging areas, or extra workspaces not identified on the project drawings or approved for use during construction.</li> </ul>