

February 23, 2021

Connie Chen Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

### Re: Monthly Report Summary #32 for the Mesa 500-kV Substation Project

Dear Ms. Chen,

This report provides a summary of the compliance monitoring activities that occurred during the period from **May 1 to 31, 2020**, for the Mesa 500-kilovolt (kV) Substation (Mesa Substation) Project in Los Angeles County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Edison (SCE) and their contractors comply with the requirements of the Final Environmental Impact Report (Final EIR) for the Mesa Substation Project, as adopted by the California Public Utilities Commission (CPUC) on February 9, 2017.

The CPUC has issued the following Notices to Proceed (NTPs) for the Mesa Substation Project to SCE:

- NTP #1 (September 27, 2017) Vegetation removal and grading, water line relocation, Operating Industries Incorporated (OII) well removal, and various line relocations (transmission, subtransmission, distribution, and telecommunications).
- NTP #2 (November 15, 2017) Remaining construction components, including vegetation removal and grading, and the removal, replacement, relocation, modification, and/or construction of perimeter and retaining walls, Mechanical Electrical Equipment Rooms (MEERs), operations and test and maintenance buildings, storm drains, lattice steel towers, various poles, underground trenches, concrete foundations, and associated components. Equipment modification at 29 satellite substations.

Onsite compliance monitoring by the WSP USA Inc. (WSP), formerly Ecology and Environment, Inc., compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitor Vince Semonsen visited the Mesa Substation construction sites on **May 8, 14, 22, and 29, 2020**. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visits. These reports are attached below (Attachment 1).

One compliance concern occurred during the period from May 1 to 31, 2020; however, overall, the Mesa Substation Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP) Compliance Plan. Communication between the CPUC/WSP compliance team and SCE has been regular and effective; the correspondence pertained to and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/WSP and SCE, along with daily schedule updates and automated

WSP USA 425 MARKET STREET 17<sup>TH</sup> FLOOR SAN FRANCISCO, CA 94105

Tel.: 415-398-5326 wsp.com



database notifications from SCE, provided additional compliance information and construction summaries. Furthermore, SCE's monthly compliance status report for May 2020 provided a compliance summary and included a description of construction activities from May 1 to 31, 2020, a detailed lookahead construction schedule, a summary of compliance with Mesa Substation Project commitments (i.e., the MMs/APMs) for biological resources, cultural and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Program (WEAP), non-compliance issues and resolutions, and public complaints and notifications.

### **Compliance Incidents**

During the May 2020 reporting period, SCE self-reported one non-compliance incident. The compliance incident is described below:

• On May 29, 2020, the CPUC Compliance Monitor observed that stormwater from recent rain events had circumvented erosion control Best Management Practices (BMPs) and eroded onsite soils, resulting in offsite sediment transport at two locations. The erosion control and SWPPP measures were not met at two separate locations. The first location was on the far western edge of the project at the gates by East Markland Drive where water was free-flowing and not diverted into the large detention basin. The BMPs were either missing or compromised. The second location where stormwater was flowing was in the southern portion of the substation near the southern retaining wall. Stormwater similarly flowed past erosion control and BMPs down a vegetated slope into a California Department of Transportation stormwater channel.

The CPUC has determined that these incidents warrant a Level 1 Non-Compliance citation.

## **Noise Compliance**

No noise exceedances occurred during the May 2020 reporting period.

### Spills

During the May 2020 reporting period, no spills were documented.

### **Public Concerns**

No public concerns were raised during May 2020.

### **Minor Project Changes**

During the May 2020 reporting period, no Minor Project Changes were submitted.

Sincerely,

Silvia Yanez Project Manager, Ecology and Environment, Inc. cc: Lori Rangel, SCE Don Dow, SCE

# ATTACHMENT 1

CPUC Site Inspection Reports May 8, 14, 22, and 29, 2020



Project:	Mesa 500-kV Substation Project	Date:	May 8, 2020
Project Proponent:	Southern California Edison (SCE)	Report #:	VS118
Lead Agency:	California Public Utilities Commission (CPUC)	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Hazy and warm with a slight breeze
WSP CM:	Silvia Yanez	Start/End time:	1030 to 1230 hours
Project NTP(s):	Notice to Proceed (NTP)-1, NTP-2		

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (Best Management Practices [BMPs]) been installed?	Х		
Are erosion and sediment control measures (BMPs) properly installed (without apparent deficiencies) and functioning as intended during rain events?	Х		
Are measures in place to avoid/minimize mud tracking onto public roadways, in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, soil piles are tarped, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 miles per hour on unpaved roads? <i>Except for the scrapers.</i>	X		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are excavations and trenches covered at the end of the day?	Х		

Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Has wildlife been relocated from work areas? If yes, describe below.		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Х	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts to these features?			Х
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			X
Are archaeological and paleontological monitors onsite, if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are required fire prevention and control measures in place?	Х		
Are contaminated soils properly managed for onsite storage or offsite disposal?	Х		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	Х		
Is construction occurring within approved hours?	Х		
Are required noise control measures in place?			Х

I arrived onsite at 1030 hours and contacted Pete Lubich and Matt Daniele to alert them that I arrived. Mr. Daniele accompanied me on my site visit. I spoke with Mr. Lubich about a work area listed in the construction Plan of the Day (POD) that I was not familiar with. He indicated that the area was to the northeast of the offices within the telecommunications corridor. Crews had removed wooden poles and were preparing to take out one of the existing tubular steel poles (TSPs) (Photo 1).

Mr. Daniele and I entered the project site through the eastern entrance and drove west through the southern portion of the construction site. Large piles of concrete and asphalt continued to be stockpiled along the access road with equipment breaking it up in preparation for recycling (Photo 2).

Work continued on the transformer catch basin south of the new 220-kilovolt (kV) rack area (Photo 3). Rebar was being added to the hole. The gas generator at the site had an inadequate drip pan under it. Mr. Daniele spoke with the Power Grade foreman about upgrading the secondary containment.

A line crew was pulling wire near the 220-kV rack area (Photo 4). Another crew was installing electrical equipment at one of the entrance gates (Photo 5).

I inspected the drainage culvert coming from the existing substation; it was still partially filled with stormwater runoff (Photo 6).

The dewatering of the large retention basin continued and the water levels were dropping (Photo 7). The SWPPP inspector said the flow rate was reduced to around 200 gallons per minute because the Nephelometric Turbidity Unit (NTU) was increasing (Photo 8). The last sampling had a reading of 230 NTUs.

The Canada geese (*Branta canadensis*) were incubating eggs and Matt said they were expected to hatch in another week. The raven (*Corvus corax*) chicks were still in the nest, but close to fledging.

Since the rainy season had ended a crew was clearing out the "V" ditches by removing gravel bags and other debris.

I inspected the area outside of the southern boundary wall; a small crew continued to work on weed removal. One of the biological monitors was sweeping the remaining weedy area before the weeding crew began work (Photo 9). Weedy vegetation was still growing along the drainage channel (Photo 10). I walked to the BMP area and noted that additional straw wattles had been added to the area (Photo 11). Sediment and the existing straw wattles hadn't been removed.

Work was being conducted within the large Phase 3 grading area. Crews continued to remove the existing concrete and asphalt (Photo 12), belly scrapers were moving soil (Photo 13), and sewer line installation and backfilling was being completed at several locations (Photos 14 and 15). Construction of the new northern boundary wall continued (Photo 16).

Photo 17 showed an overview of the Phase 3 grading area.

**MITIGATION MEASURES VERIFIED** (Refer to Mitigation Monitoring, Compliance, and Reporting Program, e.g., MM BR-9. Report only on MMs pertinent to your observations today)

All project personnel appear to have been WEAP trained (MM BR-5).

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

Continue to check on the retention basin dewatering operation and nesting birds.

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)
COMPLIANCE SUMMARY Below please describe any non-compliance issues or new biological/cultural discoveries that have occurred since your last visit. If
you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to WSP Compliance Manager. Inform WSP CM of any non-compliance incidents.
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.
Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the
mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.
Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or
has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.
Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause
major impacts on environmental resources. These actions are not in compliance with the applicant proposed measures, mitigation measures, permit conditions, approval requirements (e.g., minor project changes, notice to proceed), and/or
violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird
nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.
Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since
your last visit? If so, describe issues and resolution and include SCE report identification number.

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:	

REPRESE	EPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
5/08/20	Mesa Substation		Photo 1 – Removal of existing wooden poles within the telecommunications corridor east of Market Place Drive. Photo facing northeast.		
5/08/20	Mesa Substation		Photo 2 – Staging area for excavated concrete and asphalt. Photo facing southwest.		
05/08/20	Mesa Substation		Photo 3 – Transformer catch basin. Photo facing southwest.		

REPRESE	EPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
5/08/20	Mesa Substation		Photo 4 – A line crew pulling wire near the 220-kV rack area. Photo facing north.		
5/08/20	Mesa Substation		Photo 5 – Electrical equipment installation near the southern gate. Photo facing west.		

REPRESE	EPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/08/20	Mesa Substation		Photo 6 – Drainage channel holding rainwater runoff. Photo facing northeast.			
5/08/20	Mesa Substation		Photo 7 – Dewatering operation. Photo facing north.			
5/08/20	Mesa Substation		Photo 8 – Filter canisters for the dewatering operation. Photo facing west.			

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
5/08/20	Mesa Substation		Photo 9 – A biologist sweeping the area outside of the southern boundary fence prior to the weeding work. Photo facing west.		
5/08/20	Mesa Substation		Photo 10 – Some mustard and castor bean remained along the weeded area. Photo facing east.		
5/08/20	Mesa Substation		Photo 11 – New straw wattles were added to the existing BMPs outside of the southern boundary wall. Photo facing east.		

REPRESE	EPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
5/08/20	Mesa Substation		Photo 12 – Phase 3 demolition work of the existing substation foundations. Photo facing east.		
5/08/20	Mesa Substation		Photo 13 – Phase 3 soil work. Photo facing west.		
5/08/20	Mesa Substation		Photo 14 – New stormwater drainage pipe system.		

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description		
5/08/20	Mesa Substation		Photo 15 – Backfilling the new stormwater drainage pipe system. Photo facing east.		
5/08/20	Mesa Substation		Photo 16 – Construction of the northern boundary wall. Photo facing north.		
5/08/20	Mesa Substation		Photo 17 – Overview of the Phase 3 grading operation. Photo facing west.		

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	5/12/20
Reviewed by:	Jeff Root

Reviewed by:	Jeff Root			
Firm:	Ecotech Resources, Inc.			
Date:	5/14/20			



Project:	Mesa 500-kV Substation Project	Date:	May 14, 2020
Project Proponent:	Southern California Edison (SCE)	Report #:	VS119
Lead Agency:	California Public Utilities Commission (CPUC)	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Clear, sunny, and mild with a slight breeze
WSP CM:	Silvia Yanez	Start/End time:	0930 to 1230 hours
Project NTP(s):	Notice to Proceed (NTP)-1, NTP-2		

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (Best Management Practices [BMPs]) been installed?	Х		
Are erosion and sediment control measures (BMPs) properly installed (without apparent deficiencies) and functioning as intended during rain events?	Х		
Are measures in place to avoid/minimize mud tracking onto public roadways, in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, soil piles are tarped, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 miles per hour on unpaved roads? <i>Except for the scrapers</i> .	Х		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		

Are excavations and trenches covered at the end of the day?	Х		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Has wildlife been relocated from work areas? If yes, describe below.		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Х	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts to these features?			Х
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite, if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are required fire prevention and control measures in place?	Х		
Are contaminated soils properly managed for onsite storage or offsite disposal?	Х		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	Х		
Is construction occurring within approved hours?	Х		
Are required noise control measures in place?			Х

I arrived onsite at 0930 hours and notified both Pete Lubich and Lead Environmental Biologist Matt Daniele of my arrival. Neither was available to escort me around the project site so Biological Monitor Wayne Woodroof accompanied me.

Upon entering the site through the east entrance, I noted that extensive earthwork was completed west of the entrance, near the Mesa Operations Building (Photo 1). The Phase 3 grading operation was underway. The concrete and asphalt stockpiles continued to grow with equipment working to prepare the materials for recycling (Photo 2).

Rock was being placed at the bottom of the eastern exit and entry location; one of the Power Grade foremen said they were using the rock to upgrade the exit and entry BMPs (Photo 3). After regularly requesting BMP maintenance, new rock was being placed since the site was dry and the rainy season had ended.

The southeastern corner of the project site was being used to demolish the existing wooden and steel poles (Photo 4). Crews were cutting the wooden poles with chain saws and were using a cutting torch on the metal poles. Several existing tower foundations remained throughout the site and would be removed and processed for recycling (Photo 5).

I spoke to the biological monitor about nesting birds onsite and he said the California Gnatcatcher (*Polioptila californica*) chicks had hatched, the Canada geese (*Branta canadensis*) were still incubating eggs, and the Raven (*Corvus corax*) chicks were close to fledging.

Work began again on the southern boundary wall extension (Photo 6), and construction on the catch basin for the transformers continued (Photo 7). Crews were continuing to install the electronic surveillance equipment at locations along the southern boundary wall (Photo 8).

I inspected the upstream end of the BMPs outside of the southern boundary wall; new straw wattles had been added but no sediment was removed (Photo 9). Weed removal continued in this area with the castor bean (*Ricinus communis*) seed heads being cut and bagged before the remainder of the plant was removed.

The dewatering of the large retention basin continued with the water levels gradually dropping (Photo 10). The pumping rate was slowed to around 100 gallons per minute to ensure the Nephelometric Turbidity Unit (NTU) levels were not exceeded. An additional canister filtering system was delivered but had not been set up yet.

Construction of the large transformers continued within the rack areas (Photo 11).

Phase 3 grading continued with the earthwork (as seen in Photo 1) and the installation of the stormwater drainage pipe system (Photos 12 and 13). Existing asbestos-coated pipe was uncovered during the demolition activities; a crew sectioned off the area and were removing the hazardous material (Photo 14). Secondary containment under the heavy equipment continued to be an issue with drip pans needing to be emptied (Photo 15) and additional pans required (Photo 16). I pointed out the leaking fluid to Power Grade Foreman Craig Pernot and the biological monitor notified Mr. Daniele. Mr. Pernot immediately added additional drip pans under the leaking equipment.

Construction of the new northern boundary wall continued (Photo 17).

**MITIGATION MEASURES VERIFIED** (Refer to MMCRP, e.g., MM BR-9. Report only on MMs pertinent to your observations today)

All project personnel appear to have been WEAP trained (MM BR-5).

<b>RECOMMENDED FOLLOW-UP</b> (i.e., items to check on next visit, minor issues to resolve)					
Continue to check on the retention basin dewatering operation and nesting birds.					
<b>COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS</b> (i.e., suggestions to improve compliance on-site, environmental observations of note)					
Upgrades to the size and placement of the secondary containment are needed, especially under the larger heavy equipment.					
COMPLIANCE SUMMARY					
Below please describe any non-compliance issues or new biological/cultural discoveries that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to WSP Compliance Manager. Inform WSP CM of any non-compliance incidents.					
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.					
Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.					
Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.					
□ Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the applicant proposed measures, mitigation measures, permit conditions, approval requirements (e.g., minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.					
Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include SCE report identification number.					

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/14/20	Mesa Substation		Photo 1 – Phase 3 earthwork at the eastern end of the project site near the Mesa Operations Building. Photo facing north.			
5/14/20	Mesa Substation		Photo 2 – Staging area for excavated concrete and asphalt. Photo facing southwest.			
5/14/20	Mesa Substation		Photo 3 – Rock delivered and stockpiled to upgrade the exit and entry BMPs at the eastern entrance. Photo facing north.			

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/14/20	Mesa Substation		Photo 4 – Existing wooden and steel poles being processed for recycling. Photo facing east.			
5/14/20	Mesa Substation		Photo 5 – Existing tower foundations remained at several locations to be removed and processed. Photo facing northwest.			
5/14/20	Mesa Substation		Photo 6 – Excavation and rebar installation began for the rest of the southern boundary wall. Photo facing southwest.			

	EPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/14/20	Mesa Substation		Photo 7 – Transformer catch basin construction. Photo facing southwest.			
5/14/20	Mesa Substation		Photo 8 – Installation of surveillance equipment along the southern boundary wall. Photo facing east			
5/14/20	Mesa Substation		Photo 9 – BMPs outside of the southern boundary wall. Photo facing west.			

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/14/20	Mesa Substation		Photo 10 – Dewatering operation. Photo facing north.			
5/14/20	Mesa Substation		Photo 11 – Assembly of the transformers within the rack areas. Photo facing west.			
5/14/20	Mesa Substation		Photo 12 – Storm drain installation. Photo facing east.			

Date	Location	PHOTOGRAPHS Photo	Description
5/14/20	Mesa Substation		Photo 13 – Storm drain installation. Photo facing east.
5/14/20	Mesa Substation		Photo 14 – Hazardous materials removal.
5/14/20	Mesa		Photo facing east. Photo 15 – Drip pan
	Substation		for secondary containment.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/14/20	Mesa Substation		Photo 16 – Oil leaks under a large parked scraper.			
5/14/20	Mesa Substation		Photo 17 – Work on the northern boundary wall continued. Photo facing north.			

Completed by:	Vince Semonsen
Firm: Ecotech Resources, Inc.	
Date:	5/18/20
Reviewed by:	Jeff Root

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	5/18/20



Project:	Mesa 500-kV Substation Project	Date:	May 22, 2020
Project Proponent:	Southern California Edison (SCE)	Report #:	VS120
Lead Agency:	California Public Utilities Commission (CPUC)	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Clear, sunny, and mild with a slight breeze
WSP CM:	Silvia Yanez	Start/End time:	1000 to 1145 hours
Project NTP(s):	Notice to Proceed (NTP)-1, NTP-2		

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (Best Management Practices [BMPs]) been installed?	Х		
Are erosion and sediment control measures (BMPs) properly installed (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways, in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	X		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, soil piles are tarped, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 miles per hour on unpaved roads? <i>Except for the scrapers.</i>	X		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

Are excavations and trenches covered at the end of the day?	Х		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Has wildlife been relocated from work areas? If yes, describe below.		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Х	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts to these features?			Х
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite, if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are required fire prevention and control measures in place?	Х		
Are contaminated soils properly managed for onsite storage or offsite disposal?	Х		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	Х		
Is construction occurring within approved hours?	Х		
Are required noise control measures in place?			Х

I arrived onsite at 1000 and notified both Pete Lubich and Lead Environmental Biologist Matt Daniele of my arrival; Mr. Daniele accompanied me on my site visit. My inspection was on the Friday preceding Memorial Day weekend so crews were working a half-day, and not working over the three-day weekend.

We entered the site through the east entrance and briefly observed the earthwork being performed in the area west of the entrance near the Mesa Operations Building (Photo 1). Soil was being delivered into this area with compaction tests taken at various times. The piles of concrete and asphalt continued to grow as the demolition of the existing substation was underway (Photo 2). All existing aboveground substation infrastructure was removed (Photo 3).

Rock that was being placed at the bottom of the eastern entrance the previous week to upgrade the exit and entry BMPs remained stockpiled at the base of the entrance (Photo 4). Several water trucks were working to minimize dust at the site at the access roads and spraying the soil during the grading activities.

I spoke to Mr. Daniele about nesting birds onsite and he said the Ravens (*Corvus corax*) had fledged and the California Gnatcatcher (*Polioptila californica*) chicks were close to fledging. Two Canada geese (*Branta canadensis*) goslings hatched the previous week, staying onsite for several days before moving offsite to an area west of Markland Drive.

Work continued on the southern boundary wall extension (Photo 5). In addition to the trenching work, brick installation was underway; the mortar mixing station was set up south of the wall (Photo 6).

Form work continued for the transformer catch basin (Photo 7). Crews continued to install the electronic surveillance equipment at locations along the southern boundary wall (Photo 8). Weed removal continued throughout the project site.

The dewatering of the large retention basin continued with the water levels gradually dropping (Photo 9). An additional, large filtering canister was adding to the four existing canisters (Photo 10) and they were pumping at a rate of 300 gallons per minute (Photo 11). I spoke to the SWPPP inspector who was collecting the water samples and stated the Nephelometric Turbidity Units (NTUs) were averaging 200. The flow meter on the dewatering system showed the total number of gallons; I asked the inspector if that number reflected the amount of water being pumped out of the retention basin, but he was unsure.

One of the large transformers was set up in the 66-kilovolt (kV) rack area and had the appropriate temporary containment system (Photo 12).

Phase 3 grading continued with several pieces of heavy equipment moving soil (Photo 13). The storm drain work included trenching and installation of the piping, and pouring slurry over the new pipe (Photos 14 and 15). Mr. Daniele and I checked the secondary containment under the heavy equipment since they would be parked and unused for four days. Some of the secondary containment was adequate (Photo 16) while others were not. Mr. Daniele said a crew now inspects the drip pans at the end of each day to ensure they are adequate and properly placed.

**MITIGATION MEASURES VERIFIED** (Refer to MMCRP, e.g., MM BR-9. Report only on MMs pertinent to your observations today)

All project personnel appear to have been WEAP trained (MM BR-5).

**RECOMMENDED FOLLOW-UP** (i.e., items to check on next visit, minor issues to resolve)

Continue to check on the retention basin dewatering operation and nesting birds.

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., sug	ggestions to improve compliance on-site,
environmental observations of note)	

Upgrades to the size and placement of the secondary containment (i.e. drip pans) is needed, especially under the larger heavy equipment.

### **COMPLIANCE SUMMARY**

Below please describe any non-compliance issues or new biological/cultural discoveries that have occurred since your last visit. If
you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or
3 fill out and submit a separate Non-Compliance Report Form to WSP Compliance Manager. Inform WSP CM of any non-
compliance incidents.

- New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.
- Non-compliance Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.
- Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.
- □ Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the applicant proposed measures, mitigation measures, permit conditions, approval requirements (e.g., minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.
- Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include SCE report identification number.

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

Date	Location	Photo	Description
5/22/20	Mesa Substation		Photo 1 – Phase 3 earthwork at the eastern end of the project site near the Mesa Operations Building. Photo facing north.
5/22/20	Mesa Substation		Photo 2 – Staging area for excavated concrete and asphalt. Photo facing southwest.
5/22/20	Mesa Substation		Photo 3 – Existing substation infrastructure was removed. Photo facing north.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/22/20	Mesa Substation		Photo 4 – Rock was delivered to upgrade the exit and entry BMP at the eastern entrance roadway. Photo facing south.			
5/22/20	Mesa Substation		Photo 5 – Excavation and rebar installation for the southern boundary wall. Photo facing southwest.			
5/22/20	Mesa Substation		Photo 6 – Mortar mixing station for the southern wall brick installation. Photo facing south.			

Date	Location	Photo	Description
5/22/20	Mesa Substation		Photo 7 – Transformer catch basin construction. Photo facing southwest.
5/22/20	Mesa Substation		Photo 8 – Installation of surveillance equipment along the southern boundary wall. Photo facing east
5/22/20	Mesa Substation		Photo 9 – Dewatering operation. Photo facing northwest.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description			
5/22/20	Mesa Substation		Photo 10 – Additional filtering cannisters were installed. Photo facing west.			
5/22/20	Mesa Substation		Photo 11 – Flow meter on the dewatering system.			

Date	Location	Photo	Description
5/22/20	Mesa Substation		Photo 12 – Temporary catch basin installed around one of the transformers. Photo facing northwest.
5/22/20	Mesa Substation		Photo 13 – Equipment used in the Phase 3 grading. Photo facing west.

		PHOTOGRAPHS	Description
Date	Location	Photo	Description
5/22/20	Mesa Substation		Photo 14 – Storm drain trench. Photo facing north.
5/22/20	Mesa Substation		Photo 15 – Storm drainpipe was covered with slurry. Photo facing northwest.

REPRESENTATIVE SITE PHOTOGRAPHS						
Date	Location	Photo	Description			
5/22/20	Mesa Substation		Photo 16 – Adequate secondary containment under a scraper.			

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	5/26/20
2400	

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	5/27/20



Project:	Mesa 500-kV Substation Project	Date:	May 29, 2020
Project Proponent:	Southern California Edison (SCE)	Report #:	VS121
Lead Agency:	California Public Utilities Commission (CPUC)	Monitor(s):	Vince Semonsen
CPUC PM:	Connie Chen, Energy Division	AM/PM Weather:	Overcast, mild, and calm
WSP CM:	Silvia Yanez	Start/End time:	0945 to 1200 hours
Project NTP(s):	Notice to Proceed (NTP)-1, NTP-2		

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (Best Management Practices [BMPs]) been installed?	Х		
Are erosion and sediment control measures (BMPs) properly installed (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways, in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, soil piles are tarped, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are observed vehicles maintaining a speed limit of 15 miles per hour on unpaved roads? <i>Except for the scrapers.</i>	Х		
Are observed vehicles/equipment arriving onsite clean of sediment or plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

Are excavations and trenches covered at the end of the day?	Х		
Are wildlife escape ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology	Yes	No	N/A
Have preconstruction surveys been completed for biological (wildlife, nesting birds, coastal California gnatcatcher, least Bell's vireo) resources, as appropriate?	Х		
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Has wildlife been relocated from work areas? If yes, describe below.		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Х	
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts to these features?			Х
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite, if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g., cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on site properly managed?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are required fire prevention and control measures in place?	Х		
Are contaminated soils properly managed for onsite storage or offsite disposal?	Х		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	Х		
Is construction occurring within approved hours?	Х		
Are required noise control measures in place?			Х

I arrived onsite at 0945 hours and notified both Pete Lubich and Lead Environmental Biologist Matt Daniele of my arrival. Mr. Daniele accompanied me on my site visit.

We entered the site through the east entrance and I noted that the exit and entry BMPs had not been upgraded. The stockpiled concrete and asphalt continued to grow as the demolition of the existing substation continued (Photo 1). Several water trucks were working onsite watering the access roads and spraying the soil during the grading activities. The water trucks were being filled from the retention basin dewatering system.

Work continued on the southern boundary wall extension with climbing structures installed in the open trench (Photo 2). The open trenches were inspected each morning for wildlife by the biological monitors.

Concrete was poured within some of the forms for the transformer catch basin. A gas generator at the site appeared to be in poor condition and the drip pan under the generator was inadequate (Photo 3). While I was onsite, the generator was not operating; Mr. Daniele spoke to one of the crew about upgrading the secondary containment.

SCE line crews were using bucket lifts to work on some of the towers and wires (Photo 4).

At the retention basin dewatering continued (Photo 5). The system was being changed to accommodate additional filters to allow them to stay within their approved flow and Nephelometric Turbidity Unit (NTU) levels. The SWPPP inspector and I discussed that, as the water levels drop, the water appeared siltier.

While replacing the dewatering and filtering equipment, water was drained into the small triangular detention basin (Photo 6). Some vegetation was growing in this basin, including small willow trees that the weeding crew removed.

Crews continued to install the electronic surveillance equipment at locations along the southern boundary wall (Photo 7).

Work within the Phase 3 grading area continued with removal of the existing conduit (Photo 8), moving soil with scrapers (Photo 9), and the removal of hazardous material (Photo 10). The hazardous material was loaded into plastic-lined trucks and run through a set of scaffolding that allowed the workers to seal the load (Photo 11). Storm drain installation continued along with work on the northern boundary wall.

One of the empty buildings identified for demolition within the Phase 3 grading area had a pair of house finches (*Haemorhous mexicanus*) nesting inside, causing the demolition to be postponed (Photo 12). Mr. Daniele observed that the birds were incubating eggs.

Equipment was working in the northeastern corner of the site (Photo 13).

Some equipment was parked with adequate secondary containment (Photo 14).

**MITIGATION MEASURES VERIFIED** (Refer to MMCRP, e.g., MM BR-9. Report only on MMs pertinent to your observations today)

All project personnel appear to have been WEAP trained (MM BR-5).

<b>RECOMMENDED FOLLOW-UP</b> (i.e., items to check on next visit, minor issues to resolve)				
Continue to check on the retention basin dewatering operation and nesting bird.				
<b>COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS</b> (i.e., suggestions to improve compliance on-site, environmental observations of note)				
,				
COMPLIANCE SUMMARY				
Below please describe any non-compliance issues or new biological/cultural discoveries that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to WSP Compliance Manager. Inform WSP CM of any non- compliance incidents.				
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.				
Non-compliance – Level 1: An action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, or has the potential to cause impacts on environmental resources. If you checked this box, describe the incident below and follow-up to ensure correction.				
Non-Compliance Level 2: An action that deviates from project requirements or mitigation measures that has caused, or has the potential to cause minor impacts on environmental resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.				
Non-Compliance Level 3: An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the applicant proposed measures, mitigation measures, permit conditions, approval requirements (e.g., minor project changes, notice to proceed), and/or violates local, state, or federal law. Examples include irreparable damage to archaeological sites, destruction of active bird nests, and grading of unapproved vegetated areas. A non-compliance Level 3 may also be issued if Level 2 incidents are repeated. If you checked this box, please fill out a Non-Compliance Report.				
Non-compliance issues reported by SCE: Were there any new non-compliance issues reported by SCE monitors since your last visit? If so, describe issues and resolution and include SCE report identification number.				

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description
5/29/20	Mesa Substation	DERE DERE	Photo 1 – Stockpiles of concrete and asphalt being prepared for recycling. Photo facing southwest.
5/29/20	Mesa Substation	<image/>	Photo 2 – Installation of the southern boundary wall. Photo facing southwest.

		PHOTOGRAPHS	
Date	Location	Photo	Description
5/29/20	Mesa Substation		Photo 3 – Transformer catch basin construction with inadequate secondary containment under the gas generator. Photo facing east.
5/29/20	Mesa		Photo 4 – SCE line
	Substation		crews conducting wire work. Photo facing west.
5/29/20	Mesa Substation		Photo 5 – The dewatering system filling a water truck. Photo facing west.

REPRESE	REPRESENTATIVE SITE PHOTOGRAPHS		
Date	Location	Photo	Description
5/29/20	Mesa Substation		Photo 6 – Small triangular detention basin holding water. Several small willow trees were removed. Photo facing north.
5/29/20	Mesa Substation		Photo 7 – Crews installing surveillance equipment. Photo facing north.
5/29/20	Mesa Substation		Photo 8 – Removal of the existing conduit pipe within the Phase 3 grading area. Photo facing east.

Data		Dhata	Description
Date	Location	Photo	Description
5/29/20	Mesa Substation		Photo 9 – Earthmoving using scrapers. Photo facing west.
5/29/20	Mesa Substation		Photo 10 – Hazardous waste removal. Photo facing east.
5/29/20	Mesa Substation		Photo 11 – Scaffolding system used to seal the trucks carrying the hazardous materials.

Date	Location	Photo	Description
5/29/20	Mesa Substation		Photo 12 – House finch nest in an electrical box inside one of the remaining buildings.
5/29/20	Mesa Substation		Photo 13 –Equipment working in the northeastern portion of the site. Photo facing north.
5/29/20	Mesa Substation		Photo 14 – Adequate secondary containment.

Completed by:	Vince Semonsen
Firm:	Ecotech Resources, Inc.
Date:	6/02/20

Reviewed by:	Jeff Root
Firm:	Ecotech Resources, Inc.
Date:	6/03/20