



Aliso Canyon Turbine Replacement Project Construction Non-Compliance Report

Incident Date:	<u>May 18, 2015</u>	Report No.:	<u>NCR-04</u>
Date Submitted:	<u>July 10, 2015</u>	Location:	<u>Aliso Canyon Natural Gas Storage Field</u>
Level:	<u>Level 3 Non-Compliance</u>	Relevant Plan/Measure:	<u>MMCRP; SWPPP; NPDES General Permit</u>
Current Land Use:	<u>Disturbed; Coast live oak</u>	Sensitive Resources:	<u>Hydrology, Biology (Oak trees)</u>

Description of Incident:

On May 12, 2015 the Southern California Gas Company's (SCG's) Qualified SWPPP (Storm Water Pollution Prevention Plan) Practitioner (QSP) completed a Rain Event Action Plan for a storm forecasted to begin on May 14. The extended forecast showed a 50 percent chance of rain throughout the day on May 14, and a less than 50 percent chance on May 15. A SWPPP inspection completed on May 15 indicated that the storm lasted 24 hours and dropped approximately 0.6 inches of rain.

During a site inspection visit on Tuesday, May 19, the CPUC's Compliance Monitor, Vince Semonsen, observed hoses, saturated soil, and water pump components at the base of a Hilfiker wall and on the inside of a retaining wall at the Natural Substation work area. Mr. Semonsen took photographs of the saturated areas (sediment basins) and the adjacent energy dissipater (rip-rap), which show the condition of the area (Attachment 1). On May 20, the CPUC/E&E team e-mailed SCG stating that it was apparent water had been pumped out of the work area and asking if SCG had any photographs of the ponded water from their required May 15 SWPPP inspection. On May 22, SCG replied to the data request, explained that no photographs had been taken of the ponded water, and reported that a non-compliance incident had occurred regarding the ponded water: on May 18, an SCG contractor pumped ponded storm water out of their work area at the Natural Substation site onto the nearby energy dissipater without first performing the required sampling for turbidity or pH. The energy dissipater at this location drains directly into an oak woodland. The contractor explained to SCG that a pump and garden hose were used for approximately 15 minutes, which was calculated to be approximately 77 gallons of ponded storm water pumped out of the work area. The contractor reported that prior to discharge, the water was passed through filtering material (Mirafi 140N geotextile), and that water was clear after passing through the filter. However, water sampling did not occur and the observation of clear, filtered water was not documented (e.g., photographs).

Their National Pollutant Discharge Elimination System (NPDES) General Permit requires SCG, as a Risk Level 2 discharger, to "...collect samples of stored or contained storm water that is discharged subsequent to a storm event producing precipitation of ½ inch or more at the time of discharge" and "...analyze samples for...pH and turbidity" (Section II.I.1.c). These same requirements are also included in SCG's SWPPP for this project (Attachment D, Section I.4). Additionally, the General Permit and SWPPP contain Numeric Action Levels (NALs); NALs for this project are 250 NTU for turbidity, a lower pH limit of 6.5, and an upper pH limit of 8.5. Had the water been sampled and NAL exceedances detected, SCG would have been required to take specific corrective actions. Because sampling did not occur, it is unknown if NAL exceedances occurred and if SCG failed to take required corrective

action.

The CPUC/E&E team has communicated regularly with SCG regarding BMPs and storm water management at the Aliso Canyon Project Site since November 2014. Disrepair and absence of erosion control BMPs at several SCG project locations in the Aliso Canyon Storage Facility have been previously documented. An incident at the Natural Substation in March 2015, where BMPs were not installed on steep slopes and a sediment basin overflowed and spilled sediment laden water into the oak woodland swale below the Natural Substation, resulted in the CPUC issuing SCG a Level 3 Non-Compliance. Although SCG took corrective action (BMP implementation) after the March incident, this May 2015 incident represents a failure to adequately improve SWPPP compliance. Coordination between SCG's contractors, environmental team, and construction management was insufficient to ensure that proper protocol was followed after the storm. In addition, this was the second possible threat to the oak swale below the Natural Substation: sediment was deposited in the oak woodland during the March incident, and in this incident water with of unknown pH and turbidity was discharged into the same area. This incident had the potential to cause immediate, minor risk to the environment and was a repeated failure to adequately follow SWPPP/General Permit requirements. Therefore, this activity constitutes a Level 3 Non-Compliance.

Pertinent Plans/Permits/Mitigation Measures:

- By failing to ensure compliance with APM GE-2 regarding storm water pollution prevention, SCG violated their responsibilities identified in the MMRCP and NTP-3.
- By failing to sample storm water prior to discharge at the Natural Substation site, SCG did not follow their NPDES General Permit, issued by the State Water Resources Control Board, and their Storm Water Pollution Prevention Plan.

Proposed Resolution:

On May 19 the Project's CPUC Compliance Monitor documented evidence of storm water discharge in the area of the Natural Substation, notified the Compliance Manager, and contacted SCG's environmental team asking for details regarding the activity. SCG responded on May 22, addressing the CPUC's specific questions and providing details of the event. The CPUC sent several follow-up emails to SCG regarding the amount of water pumped, type of filtration material used, and proposed resolution (Attachment 2). After the incident, SCG's Environmental Coordinator organized a team "Stand Down/Lessons Learned/Updated SWPPP management and BMP Training" to review the SWPPP requirements with the contractor, SCG project management, and water quality specialists. This training occurred on May 29 and was attended by the CPUC Compliance Monitor Mr. Semonsen.

SCG's compliance with SWPPP requirements has improved after the Level 3 Non-Compliance was issued for the March 2015 storm; straw wattles, jute netting, silt fencing, and gravel bags have been deployed effectively. However, while the implementation of comprehensive BMPs is essential to preventing impacts during a storm event, sampling storm water and discharging collected storm water according to General Permit/SWPPP requirements after a rain event are also important to prevent the discharge of pollutants into Waters of the US. SCG's contractor did not coordinate with SCG's Environmental team before discharging storm water, indicating a deficiency in the understanding of the contractor's responsibilities and a lack of communication. SCG's follow-up training addressed these issues. The CPUC recommends continued frequent reminders to all project personnel regarding SWPPP responsibilities and protocols.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	07/06/2015	Lara Rachowicz	<i>Lara Rachowicz</i>	
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)	7/9/15	Andrew Barnsdale	<i>[Signature]</i>	
SoCalGas/SCE Environmental Compliance Manager (if applicable)				

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