

February 28, 2020

Mr. Michael Rosauer
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #12 for the Sanger Substation Expansion Project

Dear Mr. Rosauer,

Construction for the Sanger Substation Expansion Project began on November 5, 2018. This report provides a summary of the compliance monitoring activities that occurred during the period from **October 1 to 31, 2019** monitoring was performed to ensure that all project-related activities conducted by Pacific Gas & Electric (PG&E) and their contractors comply with the requirements of the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the Sanger Substation Expansion Project, as adopted by the California Public Utilities Commission (CPUC) on July 13, 2017.

Table 1 summarizes CPUC-approved Notice to Proceed (NTP) activities to-date for the Sanger Substation Expansion Project, based on activities proposed in PG&E's Notice to Proceed Requests (NTPRs).

Table 1 CPUC-approved NTP Activities for the Sanger Substation Expansion Project

NTP#	Final NTPR Submittal Date	CPUC NTP Issuance Date	Description of Approved Activities
NTP #1	11/1/2018	11/2/2018	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of access driveways, fencing, foundations, substation equipment, and a microwave tower; and installation of two antenna dishes at an off-site location (Fence Meadow Repeater Station).
NTP #2	6/6/2019	6/7/2019	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of pole foundations, installation of poles, power line stringing, removal of pull sites, and restoration of impacted property.

Table 2 summarizes all CPUC-approved Minor Project Refinements (MPRs) to-date for the Sanger Substation Expansion Project.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
MPR #001	5/24/2018	6/12/2018	Minor modifications to the placement and types of poles in the "power line reconfiguration" project component to suit engineering refinements that were made after Final IS/MND approval. The modifications would occur approximately 2,100 feet west; 750 feet

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
			east; and 165 feet south of the existing Sanger Substation footprint. In total, there would be modifications to seven poles.
MPR #002	7/17/2018	7/20/2018	An additional temporary laydown yard/staging area (approximately 974 feet by 112 feet) located north of the retention basin, running north between the western boundary of the substation expansion area and the western boundary of the existing Sanger Substation footprint. This area is owned in fee title by PG&E.
MPR #003	11/13/2018	11/14/2018	Use of an existing water well approximately 100 feet north of approved NTP #1 work areas, within the same parcel as the Sanger Substation footprint. PG&E has obtained permission from the landowner to use this well for a specified timeframe. PG&E will access the well pump by foot, and will obtain water from this well for dust control purposes. MPR #3 adds no additional ground disturbance to the existing disturbance footprint, other than impacts from light foot traffic and temporary ground placement of a water hose.

Project Compliance Incidents

Onsite compliance monitoring by the Ecology and Environment, Inc., member of WSP (hereafter referred to as E & E) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitors Evan Studley and Sam Hopstone visited the Sanger Substation construction site on **October 11 and 31, 2019**. CPUC Compliance Monitoring 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).

Overall, the Sanger Substation Expansion Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program’s (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and PG&E has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/E & E and PG&E, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, PG&E’s weekly compliance status reports provided a compliance summary, a description of construction activities that occurred each week, a summary of compliance with MMCRP conditions (MMs/APMs) for biological, cultural and paleontological resources; the Storm Water Pollution Prevention Plan (SWPPP); noise and traffic control; onsite hazards; and the Worker Environmental Awareness Program (WEAP), as well as any non-compliance issues and resolutions, and public complaints and notifications.

Compliance Incidents and Minor Compliance Observations

During the October 2019 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

Noise Compliance

During the October 2019 reporting period, there were no exceedances of the stipulated noise levels.

Mr. Michael Rosauer
January 6, 2020
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Public Concerns

No public concerns were reported during October 2019.

Sincerely,
Ecology and Environment, Inc.

A handwritten signature in black ink, appearing to read 'Silvia Yanez', with a horizontal line underneath.

Silvia Yanez
Project Manager

cc:
Michael Calvillo, PG&E
Carie Montero, Parsons
Lincoln Allen, SWCA

ATTACHMENT 1

CPUC COMPLIANCE MONITORING REPORTS

OCTOBER 11 AND 31, 2019



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCDG-101119
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	10/11/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Evan Studley, Sam Hopstone
CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager	Silvia Yanez	AM/PM Weather	Clear, 79°F, calm
CPUC (E & E) Monitoring Supervisor	Fernando Guzman	Start/End Time	12:30 PM – 1:30 PM
Project Notices to Proceed NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

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 onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
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 in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 miles per hour (mph) on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		

Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g., cultural sites) clearly marked and being maintained?			X
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		

Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or off-site disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		
Are required noise control measures in place?	X		

AREAS MONITORED

Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

12:30 PM- We arrived onsite through south gate. We checked in with Tom Frost and Chennie Castañon (PG&E Environmental Inspector) who provided a construction progress update. No biological resources were encountered during sweeps (MM BIO-2). Pending CPUC approval, biological monitoring will be reduced from full-time monitoring to weekly sweeps. Colibri Ecological Consultants will commence biological monitoring next week, and Miguel Cisneros will commence winter stormwater inspections next week. Current activities include leveling the base of the southwest basin, forming and pouring concrete stairs for the impact buildings, and pouring slurry in the trenches. Future work planned includes pouring tubular steel pole (TSP)-12 foundation in the southeast corner of the site next week, continuing leveling the southwest basin bottom, and finishing the concrete stairs. Civil construction is scheduled to conclude in October, and general contractor (GC) will proceed during November.

12:50 PM- We began a site walk, headed west along northern boundary of expansion footprint. We continued into the laydown yard and observed straw wattles with sandbags have been installed along the entirety of the northern and western fences (Photo 2) (APM GEO-2/APM WQ-1). We exited the laydown yard and proceeded south along the western swale.

12:55 PM- We entered the trailer, confirmed SWPPP binder is kept up-to-date. We exited the trailer, noted that escape ramps are in every concrete vault. North of the trailer, we observed concrete swales are complete (Photo 3), and crews were forming and pouring staircases for the permanent structures.

1:00 PM- We followed concrete swales south to the southwest retention basin. Crews were leveling the bottom of the basin (Photo 5) and tidying up around the lip of the concrete sides. We proceeded east along the southern boundary of the expansion footprint to the south gate.

1:15 PM- We checked in with Ms. Castañon and Mr. Frost by the south gate.

1:30 PM- We proceeded north along eastern site boundary and observed crews pouring slurry into trenches. We exited the project site through north gate.

NEW SENSITIVE RESOURCE DISCOVERIES

MITIGATION MEASURES VERIFIED

APM AES-3, APM AIR-1, MM BIO-2, APM GEO-2/APM WQ-1, MM-HAZ-1, APM NOI-4, MM TRAN-1

See additional applicant proposed measures (APMs) and mitigation measures (MMs) listed in the Description of Observed Activities section.

RECOMMENDED FOLLOW-UP

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

- Level 0 Acceptable.** (*no compliance incidents*)
- Level 1: Minor Problem.** An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.
- Level 2: Compliance Deviation.** An event or observation that deviates from project requirements and puts a resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form.
- Level 3: Non-Compliance.** An event or observation that violates project requirements and affects a resource. Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. 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 Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) APMs or MMs, permit conditions, or approval requirements (e.g., minor project changes, NTP), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.

Compliance Incidents reported by PG&E's Compliance Team

- PG&E's Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.

Description: (*include PG&E's report number*)

New Sensitive Resources

- New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

Description:

None.

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

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

REPRESENTATIVE SITE PHOTOGRAPHS				
Date	Location	Photo	Description	
10/11/19	Expansion footprint		Photo 1- Restrooms are secondarily contained. Photo facing northwest.	
10/11/19	Laydown yard		Photo 2- Straw wattles and sandbags have been installed along north and west fence. Photo facing north.	
10/11/19	Expansion footprint		Photo 3- Concrete swales along western and southern boundary are complete. Photo facing south.	

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
10/11/19	Expansion footprint		Photo 4- Leftover concrete materials are contained and kept off the soil. Photo facing east.
10/11/19	Southwest basin		Photo 5- Retention basin concrete liner is complete, and the entry is armored with boulders for erosion prevention. Photo facing west.
10/11/19	Expansion footprint		Photo 6- Concrete trucks have sufficient crew members to contain concrete within formed areas and trenches; no spillage or waste is observed. Photo facing west.

Completed by:	Evan Studley
Firm:	Soar Environmental Consulting, Inc.
Date:	10/11/19
Reviewed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	10/13/19



Sanger Substation Expansion Project CPUC Compliance Monitoring Report

Project Proponent	Pacific Gas & Electric (PG&E)	Report No.	CM-CPUCDG-103119
Lead Agency	California Public Utilities Commission (CPUC)	Date (mm/dd/yy)	10/31/19
CPUC Project Manager	Michael Rosauer	Monitor(s)	Evan Studley, Sam Hopstone
CPUC (Ecology and Environment, Inc., member of WSP [E & E]) Monitoring Manager	Silvia Yanez	AM/PM Weather	Clear, 70°F, calm
CPUC (E & E) Monitoring Supervisor	Chennie Castañon	Start/End Time	1:00 PM – 2:05 PM
Project Notices to Proceed NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST *(Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)*

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 onsite personnel (e.g., construction workers, managers, inspectors, monitors)?	X		
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 in accordance with the project's Storm Water Pollution Prevention Plan (SWPPP)?	X		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	X		
Are measures in place to avoid/minimize mud tracking onto public roadways?	X		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	X		
Are work areas being effectively watered prior to excavation or grading?	X		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	X		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 miles per hour (mph) on unpaved roads/10 mph off-road?	X		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	X		

Are observed vehicles/equipment turned off when not in use?	X		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	X		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	X		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	X		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	X		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	X		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	X		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	X		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	X		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		X	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		X	
Did you observe any threatened or endangered species? If yes, describe below.		X	
Have there been any work stoppages for biological resources? If yes, describe below.		X	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g., cultural sites) clearly marked and being maintained?			X
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	X		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	X		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		X	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used onsite properly managed?	X		
Are procedures in place to prevent spills and accidental releases?	X		

Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	X		
Are contaminated soils properly managed for onsite storage or off-site disposal?	X		
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?	X		
Is construction occurring within approved work hours?	X		
Are required noise control measures in place?	X		

AREAS MONITORED

Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

1:00 PM- We arrived onsite through the north gate. We checked in with Jeff Clarkson, senior civil inspector for PG&E. He provided a construction progress update. No biological resources were encountered during sweeps (MM BIO-2). Completed activities included water testing the completed concrete swale, which confirmed that water flows towards the detention basin. Tubular steel pole (TSP)-12, located at the southwest corner of Jensen and McCall, is complete. Current work includes concrete foundation work, trenching, prewiring, prechecks, and conduit installation. The civil crew plans to work through the end of 2019, and finish early 2020. Jim Kacerek and the general contractor (GC) crew will continue work through 2020, and plan to string wires on the poles in fall 2020. Mr. Clarkson reminded us the first-aid kits and SWPPP plans are available in the trailers.

1:40 PM- We proceeded west along north fence, entered laydown area. We observed laydown area is clean and the wrapping on transformers was removed and disposed of, so no plastic remains in the laydown area, only equipment (Photo 3). We exited the laydown area, proceeded south along the concrete swale at the western fence of the expansion area.

1:45 PM- We met Clayton Ruell of AJ Excavation, signed their job safety analysis (JHA). We observed that vaults by the south permanent structures are covered and handrails have been installed at all staircases (Photo 6). We proceeded south along the swale to the retention basin. All concrete work on the basin was completed and the bottom of the basin was scarified to maximize infiltration during storm events.

1:55 PM- We entered the construction trailer, checked the SWPPP (APM GEO-2/APM WQ-1). We exited the trailer, proceeded east along the south boundary of the expansion footprint. We turned left, headed north along the eastern side of the expansion footprint and observed that concrete chemicals and restrooms were secondarily contained. (Photo 1)

2:05 PM- We checked back in with Mr. Clarkson and exited the project site through north gate.

NEW SENSITIVE RESOURCE DISCOVERIES

MITIGATION MEASURES VERIFIED

APM AES-3, APM AIR-1, MM BIO-2, APM GEO-2/APM WQ-1, MM-HAZ-1, APM NOI-4, MM TRAN-1

See additional applicant proposed measures (APMs) and mitigation measures (MMs) listed in the Description of Observed Activities section.

RECOMMENDED FOLLOW-UP

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY

Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.

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- PG&E’s Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.

Description: (*include PG&E’s report number*)

New Sensitive Resources

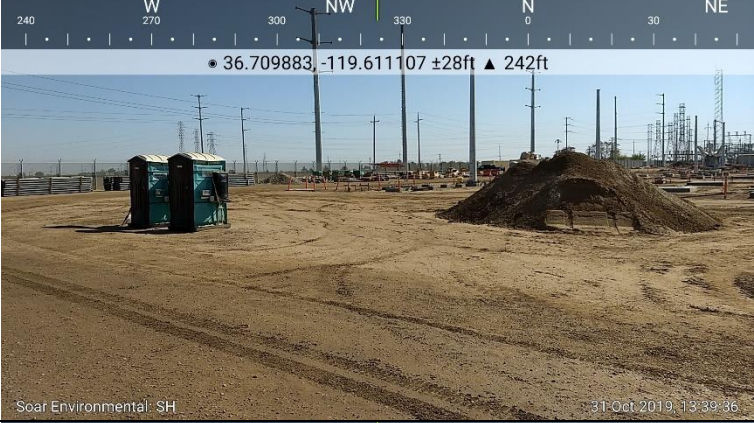
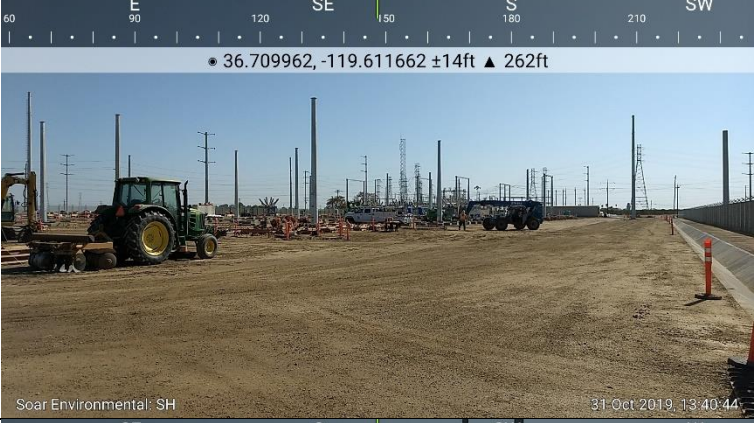
- New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit. If checked, please describe the new discoveries and documentation/verification below.

Description:
None.

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

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

REPRESENTATIVE SITE PHOTOGRAPHS

Date	Location	Photo	Description
10/31/19	Expansion footprint		Photo 1- Restrooms are secondarily contained, and soil stockpiles are wetted. Photo facing northwest.
10/31/19	Expansion footprint		Photo 2- Crews are arranging concrete foundation formwork in a clearly marked work zone. Photo facing south.
10/31/19	Laydown yard		Photo 3- In laydown yard, materials are staged neatly and away from the path of travel. No trash is present. Photo facing south.

REPRESENTATIVE SITE PHOTOGRAPHS			
Date	Location	Photo	Description
10/31/19	Expansion footprint		Photo 4- Trenches for conduit are clearly marked and roped off to prevent pedestrian access. Photo facing east.
10/31/19	Expansion footprint		Photo 5- All structures, fences, and poles are well grounded. Photo facing northeast.
10/31/19	Expansion footprint		Photo 6- Vaults north of the permanent structures have received permanent covers, and stairways have handrails. Photo facing east.

Completed by:	Evan Studley
Firm:	Soar Environmental Consulting, Inc.
Date:	10/31/19
Reviewed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	10/31/19