

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Incident Date:	June 12, 2020	Report No.:	NCR-006
Date Submitted:	September 17, 2020	Location:	Old Mesa Substation footprint
Level:	Level 2 Non-Compliance	Relevant Plan/Measure:	MM HZ-4
Current Land Use:	Mesa Substation	Sensitive Resources:	N/A

Description of Incident: On June 12, 2020, Power Grade Inc. (PGI), the primary civil contractor for the Mesa Substation Project, found transite (asbestos-cement material) during excavation activities at the Old Mesa Substation footprint. The incident (including location) is described below.

Old Mesa Substation Footprint:

Between June 12 and June 13, 2020, while excavating and removing foundations in the 220-kV area of Old Mesa Substation, PGI uncovered transite pipe. Subsequent to the discovery, PGI moved portions of the transite pipe out of the immediate area and staged the material on plastic approximately 40 feet to the east. PGI is not approved as an abatement contractor and not allowed to handle or excavate asbestos containing materials (ACM). Additionally, moving the transite contained in excavated material would conflict with MM HZ-4 with respect to handling contaminated soils, and procedures for appropriate disposal and/or treatment.

The area was roped off on June 15, 2020, as an active exclusionary zone for all onsite workers and personnel. SCE notified by phone the Los Angeles County Fire Department Health Hazardous Materials Division (local CUPA) and South Coast Air Quality Management District (SCAQMD).

Pertinent Plans/Permits/Mitigation Measures:

The Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP) was created based on the Final Environmental Impact Report and serves as a working guide for maintaining environmental compliance for the Mesa Substation Project. The mitigation measures (MMs) and applicant proposed measures within the MMCRP are required to be followed by SCE, including the following, which are relevant to this non-compliance incident. Relevant portions of MMs are provided below (with underlines) for reference.

MM HZ-4: Contaminated Soil Contingency Plan. During construction, an appropriately trained construction personnel, under the supervision of a California licensed registered geologist or professional engineer, will be present to monitor soil conditions during all earthmoving activities. If potentially contaminated soils are encountered during construction, the applicant would implement the Contaminated Soil Contingency Plan to assess the soils and to determine appropriate procedures based on the nature of the contamination, which may include avoidance or collection and analysis to determine appropriate disposal or treatment options.

Proposed Resolution:

SCE has reported to the CPUC the following corrective actions and resolutions:


- Upon discovery of the transite pipe on June 12, 2020, PGI immediately stopped work and contacted the SCE site representative. Based on field communications between PGI and SCE, PGI understood SCE's request to expose all the ACM) located within the area. In an effort to expose the ACM, stockpiles were relocated to continue that discovery process. As PGI relocated the stockpiles of concrete debris, the operator identified additional transite pipes mixed in the material. The operator laid out plastic and placed mixed debris on the plastic to allow for the excavation and

exposure of the transite pipes. Placement of the materials was completed mechanically from within the exposed cab of the excavator. For future discoveries of ACCM, PGI will halt operations and notify the appropriate individuals. PGI will not take further actions until the material has been properly abated by a certified asbestos contractor.

- Excavation activities at the Old Mesa footprint ceased, and the area was roped off on June 15 as an active exclusionary zone for all onsite workers and personnel. SCE notified by phone the Los Angeles County Fire Department Health Hazardous Materials Division and South Coast Air Quality Management District (SCAQMD).
- SCE applied water to the area twice a day to limit exposure of airborne asbestos particles. Additionally, a soil binding treatment is being applied in the area to further limit potential airborne particles containing asbestos. Asbestos air quality sampling is being completed once a day to ensure there is no asbestos air borne particle readings. Moving forward, SCE continued to utilize drawings to locate underground conduits.
- On June 25, 2020 – SCE was issued a Notice to Comply (NTC) from SCAQMD with a specified deadline to respond by July 1, 2020. The NTC requested SCE information identified during the inspection process in order to determine the facility's compliance status. In response to SMAQMD's NTC, SCE prepared five Procedure 5 Plans required to clean-up any disturbed Asbestos Containing Materials in accordance with SCAQMD Rule 1403 guidelines. The five separate work plans were submitted as follows:
 - 220kV undisturbed area
 - 220kV disturbed area
 - 66kV area
 - Contaminated equipment and travel pathways
 - Rock/concrete piles
- As of July 28, 2020 – Three of five work plans submitted to SCAQMD had been approved.
- As of August 11, 2020 – The 220-kV undisturbed area had been fully abated and Arcadis (SCE's contractor) was on site daily as the certified asbestos consultant. Every time crews moved to a new abatement area, there were two full days of air quality monitoring. Moving forward, all abatement work will continue from 6:00pm – 6:00am with no other work being done at that time. When moving to a new area where there is contamination, there is constant air quality monitoring.
- As of August 25, 2020 – Arcadis and AIS continued onsite daily overseeing asbestos and abatement work, which was performed at night hours. Out of the five original work plans submitted, three locations had been fully abated and remediated. If crews discover unbroken transite during grading or excavation, an annual Procedure 5 Plan would be utilized in some instances. If transite is discovered in the middle of foundation, work is halted, a contractor from Arcadis is called and a survey is performed in the area to confirm the discovery. If broken transite is found, there will be a new survey conducted and a new work plan will be submitted.
- As of September 8, 2020– of the five work plan areas, crews were working on the final asbestos abatement area. As more transite materials are expected to be found during excavation of the final area, SCE has instructed Arcadis to remain on site and prepared to halt work, rope off the area, and conduct a new survey. SCAQMD representatives have not been on site recently.
- Thus far, SCAQMD and the Los Angeles County Fire Department have expressed satisfaction with SCE's responsiveness to the unanticipated discovery of transite during excavation activities at the Old Mesa Substation footprint.

Recommended Timeline for Follow-up:

SCE shall continue bi-weekly reporting to CPUC on the status of ACM abatement activities approved by SMAQMD and provide copies of coordination documentation with SCAQMD and any revisions to the approved Procedure 5 Plans to the CPUC. Additionally, SCE shall notify CPUC of any additional discoveries of ACCM on site and provide an ongoing update of the progress for abatement and remediation.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	09/25/2020	Silvia Yanez		MMCRP shall be updated to include ACM handling and abatement procedures during excavation.
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)	09/25/2020	Connie Chen	<i>Connie Chen</i>	
SCE Environmental Project Manager (if applicable)				

Prepared by: Silvia Yanez

Date: 09/25/2020

Non-compliance Level	Example
A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, nor has the potential to cause impacts on environmental resources.	<ul style="list-style-type: none"> i. Failure to implement adequate dust control measures resulting in no impact on resources; ii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters); iii. Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources; iv. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot
A Level 2 non-compliance incident is an action that deviates from project requirements or mitigation measures and has caused, or has the potential to cause minor impacts on environmental resources.	<ul style="list-style-type: none"> i. Work without appropriate permit(s) or approval; 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); iii. Working outside of approved hours; iv. Repeated documentation of Level 1 incidents

<p>A Level 3 non-compliance incident is 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 APMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law.</p>	<ul style="list-style-type: none"> i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site; ii. Eminent danger or documented impact to a sensitive or T&E species; iii. Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents); iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk
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Attachment 1

Field Reporting Environmental Database (FRED) Incident Report

Created By: Lori Rangel (Southern California Edison)
Created Date: 08/31/2020
Report #: 000177



Mesa Substation - Incident Reporting Form

Incident ID: 000177
Monitor: Lori Rangel (Southern California Edison)
Work Package: 1
Project Component: Mesa Substation
Lead Monitor / SME: Lori Rangel (Southern California Edison)
Restoration Site ID:
Time: 15:00
Date: 06/13/2020
MMCRP Category: Hazards and Hazardous Materials
Regulatory Category: MM HZ-4
Compliance Level: 2

Description:

Between June 12 and June 13, 2020, while excavating and removing foundations in the 220kV area of old Mesa, Power Grade uncovered transite pipe. Subsequent to the discovery, Power Grade moved portions of the transite pipe out of the immediate area, and staged the transite on plastic approximately 40 feet to the east. Power Grade is not approved as an abatement contractor and not allowed to handle or excavate asbestos. Additionally, moving the transite is in conflict with MM HZ-4 with respect to handling contaminated soils, and procedures for appropriate disposal and/or treatment.

UTM (meters): 11N 397376 mE 3766593 mN

Location Name: Mesa old 220kV Rack

Comments/Action:

Site is temporarily stabilized. Agencies notified of transite discovery.

Persons Notified:

Power Grade, Steve Londagin, Craig Pernot

Time Notified:

Incident Category:**Resource Owner:**

Other

Contractor:

Power Grade Inc.

Status:

Open (X) Resolved Closed per Management Disposition Incident Removed

Resolution Comments:

Power Grade Inc. has been made aware of this incident. Upon the discovery of the transite pipe on June 12th, Power Grade Inc. immediately stopped work and contacted the SCE site representative. Based on field communications between PGI and SCE, PGI understood SCE's request to expose all the ACCM located within the area. In an effort to expose the existing ACCM, stockpiles were relocated to continue that discovery process. As Power Grade Inc. relocated the stockpiles of concrete debris, the operator identified additional transite pipes mixed in the material. The operator laid out plastic and placed the mixed debris on the plastic to allow for the excavation and exposure of the transite pipes. Placement of the material was done mechanically from within the enclosed cab of the excavator.

For future discoveries of asbestos containing construction materials, Power Grade Inc. will halt all operations and notify the appropriate individuals. Power Grade Inc. will take no further action until the material has been properly abated by a certified asbestos contractor.

Contractor Response:Yes

Uploaded Files

File Name	Size(Bytes)	Uploaded By
<u>Mesa_220kV_Asbestos1.jpg</u>	<u>153.18 KB</u>	<u>Lori Rangel</u>

Uploaded Images

File Name	Size(Bytes)	Uploaded By	Description
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Document link

Updated By: Lori Rangel**Date:** 07/10/2020**Original Submission Date:**

07/10/2020

Original Final Approval Date:

07/10/2020

Response Submitted by Contractor

Contractor: Lori Rangel
BMCD: Lori Rangel
SME Approved: Lori Rangel

Date: 08/31/2020
Date: 08/31/2020
Date: 08/31/2020

Attachment 2

NCR-006 Incident Photograph and Figure



Photo 1: Exclusionary zone -asbestos containing construction material covered and roped off at the old Mesa Substation footprint area, June 12, 2020.

