



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

<b>Incident Date:</b>	<u>07/13/2015</u>	<b>Report No.:</b>	<u>NCR-05</u>
<b>Date Submitted:</b>	<u>07/31/2015</u>	<b>Location:</b>	<u>Aliso Canyon Storage Field P-40 Staging Area</u>
<b>Level:</b>	<u>Level 1 NC</u>	<b>Relevant Plan/Measure:</b>	<u>MMCRP</u>
<b>Current Land Use:</b>	<u>Bare Ground, Wellhead</u>	<b>Sensitive Resources:</b>	<u>None</u>

### Description of Incident:

On July 13, 2015, the SCE Natural Substation crew began activity at the P-40 Staging Area prior to receiving CPUC approval. At this time, MPR-F, which includes the placement and utilization of three trailers at the P-40 location, was under CPUC review for CEQA compliance. One construction trailer was delivered, staged, and utilized at the Aliso Canyon Storage Field's P-40 site, along with a toolbox container. The following day, July 14, 2015, SCE's Environmental Compliance Manager (ECM) noticed the delivery and use of the trailer. The ECM attempted to stop the delivery of the two additional trailers until their installation and use was approved via MPR-F.

In SCE's self-report of this incident, their ECM explained that SCE had been in contact with Los Angeles County regarding the need for a permit in order to place the trailers. After some discussion the County determined that SCE did not need a County permit to place the trailers. The SCE Natural Substation team was unaware that CPUC approval was still necessary, in addition to the approval from the County, and proceeded with trailer delivery and utilization.

### SCE's Corrective Action

On July 14, 2015, during a morning site walk, SCE's ECM noticed the delivered trailer and toolbox container staged at P-40 and called the construction manager to halt the delivery of the other trailers until CPUC approval was given. The ECM explained to the team that the County permit was separate from the CPUC approval process and that final approval had not been given for delivery of the trailers. That same day the ECM notified the CPUC team of the unauthorized delivery. In addition, SCE's ECM explained to the CPUC CM that the SCE crew at the Natural Substation was new to the Aliso project and that she should have explained to them sooner that CPUC approval was still needed.

After follow up phone calls with the CPUC Compliance Manager (CM), it was decided that the best option was to allow SCE to move the tool container to the well pad at the Natural Substation and stage the other two trailers at the P-40 site; however, these two trailers would be locked and remain unused until MPR-F was approved. The SCE ECM communicated this to the SCE Project Manager on the morning of July 16, 2015.

### Pertinent Plans/Permits/Mitigation Measures:

MMCRP

### Proposed Resolution:

1. SCE halted the delivery of the other trailers and notified the CPUC.
2. SCE's Environmental Compliance Manager explained the CPUC approval process for work at the Aliso Canyon Storage Field to the SCE Natural Substation crew.
3. SCE communicated with the CPUC Compliance Manager and committed to keeping the two trailers locked and unused until MPR-F approval is given.
4. All SCE managers and crews need to be reminded regularly about the CPUC approval process and what project components and locations need CPUC approval before construction may begin.

**Recommended timeline for follow-up:**

1. Immediate actions were taken to stop the delivery of additional trailers.
2. Communication with the CPUC Compliance Manager helped decide on a resolution.
3. The trailers remained unused until the approval of MPR-F.
4. MPR-F was approved July 29, 2015.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	7/31/2015	Lara Rachowicz	<i>Lara Rachowicz</i>	
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)				
SoCalGas/SCE Environmental Compliance Manager (if applicable)				

Prepared by: Andrés Estrada

Date: 7/21/2015

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