



Aliso Canyon Turbine Replacement Project Construction Non-Compliance Report

Incident Date:	<u>November 4, 2015</u>	Report No.:	<u>NCR-09</u>
Date Submitted:	<u>January 12, 2016</u>	Location:	<u>Wiley Canyon – Drainage No. 4 (near TSP 25) GPS: 34.349294 - 118.534475</u>
Level:	<u>Level 1 Non-Compliance</u>	Relevant Plan/Measure:	<u>MMCRP; APM GE-2; APM HZ-5; APM HZ-6; MM BR-5; USACE 404 Permit; RWQCB 401 Permit</u>
Current Land Use:	<u>Waters of the United States and State</u>	Sensitive Resources:	<u>Hydrology, Biology</u>

Description of Incident:

On November 4, 2015, a subcontractor to Henkel's & McCoy (H&M) – Southern California Edison's (SCE's) subtransmission construction contractor – was working in Drainage No. 4 (adjacent to the TSP 24/25 access road). This subcontracting crew was installing a concrete headwall in the drainage using a concrete truck. After the headwall had been poured the subcontracted concrete truck pump operator released approximately 20 gallons of concrete washout wastewater into the drainage. Over half (approximately 12 gallons) of the wastewater spread onto the installed drainage apron while the rest (approximately 8 gallons) flowed onto the dirt floor of the drainage (Attachment 1).

As described in H&M's report of the incident (Attachment 2), the operator did not understand that he was supposed to keep the washout wastewater in the machine's hopper and haul it off site for disposal because he did not receive adequate Worker Environmental Awareness Program (WEAP) Training. The CPUC Compliance Manager was notified of this incident separately by the CPUC's Compliance Monitor and by SCE's Environmental Coordinator on November 5, 2015, the day after the incident occurred. During the CPUC's follow-up with SCE's Environmental Coordinator, it was explained that the subcontractor cement truck driver and pump operator received an abbreviated WEAP because of their status as "delivery drivers". This abbreviated training was given under the assumption that the driver and operator would only deliver concrete and leave the site. After the spill was noticed by other crew members, cleanup was initiated. The contaminated soil was picked up and removed from the site for proper disposal. After it dried, the residual washout layer was cleaned off of the drainage apron with wire brushes and scrapers, and then vacuumed for proper disposal.

SCE's failure to ensure all project personnel were adequately trained and informed of project commitments led to a subcontractor dumping concrete washout wastewater into a drainage designated as Waters of the United States (U.S.). This action was a violation of several project Applicant Proposed Measures (APMs), a Mitigation Measure (MM), and Clean Water Act (CWA) 401 and 404 permits. The intentional release of hazardous material into a sensitive environmental resource – Waters of the U.S. and State – and lack of adequate worker education had the potential to cause immediate risk to environmental resources. However, given SCE was working in the drainage while no water was present, concrete was not released into water and, after clean-up, impacts were minimal. Given this, a Level 1 Non-Compliance is issued.

Pertinent Plans/Permits/Mitigation Measures:

- By failing to provide the appropriate level of Worker Environmental Awareness Program Training regarding hydrological resources and construction Best Management Practices, SCE violated APM GE-2, APM HZ-5, and APM HZ-6
- By pouring concrete washout wastewater into a designate Water of the United States and State, SCE violated conditions of their United States Army Corps of Engineers CWA 404 permit, RWQCB CWA 401 Permit. Failing to comply with these permits and

the SWPPP is a violation of MM BR-5.

Proposed Resolution:

- Following the incident, SCE notified the Regional Water Quality Control Board (RWQCB) on November 6, 2015 regarding the spill and followed up with an official report within 5 days of the spill per the conditions of SCE's 401 Water Quality Certification.
- The incident report provided by H&M and SCE's correspondence with the CPUC indicated that the concrete pump operator received an abbreviated training instead of the full Worker Environmental Awareness Program (WEAP) Training because he was considered a delivery driver. H&M reviewed the incident with their subcontractor and emphasized the project's mitigation measure requirements and wastewater removal requirements. Moving forward H&M will brief pump truck operators and cement truck drivers regarding compliance with project commitments; SCE will ensure these drivers and operators receive the complete WEAP; biological monitors will monitor all work in jurisdictional drainages until construction in those areas is complete; and H&M personnel will monitor subcontractor activity.

Approvals	Date	Name (print)	Signature
CPUC Compliance Manager	1/11/16	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: Andres Estrada, Lara Rachowicz

Date: 12/14/15

Attachment 1

Photos taken by the CPUC Compliance Monitor of Concrete Washout
Wastewater Discharged in the Drainage
November 4, 2015



Photo 1: Concrete washout wastewater pooling in Drainage 4. November 4, 2015.



Photo 2: Concrete washout wastewater poured on slope leading to Drainage 4 (lighter color). November 4, 2015.

Attachment 2

Henkel's & McCoy Internal Spill Event Report (Included as Attachment 4 in
SCE's Report to the Regional Water Quality Control Board)
November 10, 2015



ATTACHMENT 4: INTERNAL SPILL EVENT REPORT

Date: 11-4-15, 7:45 AM	Reporter's Name: Tim Smyth
Location: Newhall, CA	Reporter's Title: Safety supervisor
Spill Summary	
Location of the Spill	Drainage 4
Type of Material Spilled (fuel type or chemical name/constituents)	Diluted concrete wastewater
Estimated Quantity of Spill (gallons)	20 gallons total 12 gallons – on concrete dissipater rip-rap 8 gallons – on bare soil
Storm Drain Discharged To (includes ditches and ground surfaces)	Unnamed tributary drainage to the Santa Clara River
Individual Discovering Spill Company Phone Number	Hector Sanchez Edison Inspector Angel Romero H&M Safety Richards sub-contractor personnel Henkel's & McCoy Inc. 909-229-6395
Cause of Spill or Release	
Subcontractor released diluted concrete wastewater from equipment washout pump's 20 gallon hopper. The contaminated water encountered three separate areas of ground, bare soil above dissipater, concrete dissipater riprap of Drainage 4, and bare soil at end of riprap of Drainage 4. The approximate areas of ground encountered were 3'x4', 5'x20', and 3'x6', respectively. Drainage 4 is located between TSPs 24 and 25. Richards' (subcontractor) crew was working in another area of the drainage and did not see that the subcontracted concrete truck pump operator released the waste water onto the dissipater rip rap. The operator did not understand that he was to keep this water in his machine and haul it off site due to inadequate briefing between sub-contract foreman and operator prior to start of work.	



Corrective Action(s) Taken

Dried residual concrete layer removed from rip-rap with scrapers and brushes. Materials vacuumed up and brought in for disposal.

Approximately 5 gallons of contaminated soil was removed and disposed of.

Measures Taken to Minimize Recurrence

- 1) Review incident with subcontractor and emphasized the mitigation requirements of the job including the requirement that all waste water will be removed from the site or washed out in approved areas only.
- 2) Ensure pump truck operator and cement truck drivers are well briefed upon arrival.
- 3) Monitor operators and drivers.
- 4) Emphasize immediate reporting of all spills or discharges to crews and subcontractors

Disposal Summary

Material to be Disposed	Disposal Contractor
Residual concrete layer removed from rip-rap and vacuumed up for disposal	Lightning Oil Company (Contact – John 626-274-3246)
5 gallons of soil contaminated with diluted concrete wastewater	Lightning Oil Company (Contact – John 626-274-3246)