Aliso Canyon Turbine Replacement Project
Construction Non-Compliance Report

Incident Date:	November 1, 2014 through May 19, 2015	**Report No.:**	NCR-08
Date Submitted:	3/17/2016	**Location:**	Aliso Canyon Natural Gas Storage Field
Level:	Level 2 Non-Compliance	**Relevant Plan/Measure:**	MMCRP; NPDES General Permit (SWPPP); APM GE-2
Current Land Use:	Disturbed	**Sensitive Resources:**	Hydrology, Biology: drainages, riparian, oaks

Incident Summary:

Regulatory Setting

Southern California Gas Company (SCG) has obtained a National Pollutant Discharge Elimination System (NPDES) General Permit for Construction and Land Disturbance Activities for the Aliso Canyon Turbine Replacement (ACTR) Project. This permit requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP) by a Qualified SWPPP Developer (QSD). The goal of the SWPPP is to protect overall water quality during construction activities and identify Best Management Practices (BMPs) which will minimize the transport of contaminants or sediment to receiving waters. SCG's SWPPP requires weekly inspections of the construction site by the Qualified SWPPP Practitioner (QSP), and at least one inspection each 24-hour period during extended storm events. During these inspections the QSP identifies and records BMPs that need maintenance or improvements (BMP deficiencies) and provides recommendations. The SWPPP further requires that within 72-hours of being made aware of failures or shortcomings, SCG will begin implementing repairs or design changes to BMPs and will complete the changes as soon as possible. In addition, the ACTR Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) requires SCG to comply with APM GE-2 to control erosion and sediment displacement and transport.

Non-Compliance

Between November 2014 and May 2015, SCG's QSP documented numerous BMPs that required upgrades or needed repair in the weekly inspection reports and the storm reports. The California Public Utilities Commission (CPUC)/Ecology and Environment, Inc. (E & E) Team noticed that some of the same BMP deficiencies were reported in multiple, successive reports, indicating that the deficiencies were not addressed according to the process described in the SWPPP (i.e., begin implementing repairs or design changes within 72-hours and complete changes as soon as possible). Recurring BMP deficiencies were documented throughout the Aliso Canyon Storage Field including at the Central Compressor Station (CCS), PS-42 Fill Site, PS-42 Rock Staging Area, P-32 Fill Site, the Natural Substation Area, and the Admin/IM Building Area. Some of these recurring BMP deficiencies remained outstanding for more than two months.

The CPUC/E & E Team first raised compliance concerns regarding the absence of sufficient BMPs at the PS-42 Fill Site in November 2014. Despite raising these concerns, damaging erosion and sedimentation occurred during December 2014 storms at and below the PS-42 Fill Site. Non-Compliance Reports (NCRs) documented SWPPP and BMP non-compliance events during the December 2014 storms at the PS-42 Fill Site (NCR-6), during a March 2015 storm at the Natural Substation (NCR-3), and during a May 2015 storm (NCR-4). These NCRs document the CPUC/E&E Team's communication with SCG as well as SCG's response regarding BMP upgrades and SWPPP concerns. While SWPPP and BMP upgrades were made in response to these

non-compliance events, SCG's QSP identified recurring BMP deficiencies throughout the end of 2014 and first half of 2015 at several other locations throughout the storage field which were not addressed according to the process specified in the SWPPP.

Attachment 1 displays all the BMP deficiency items from November 3, 2014 through May 19, 2015 and the weeks they were documented by the QSP. In some cases many weeks passed between the first report of a deficiency and the last, indicating that BMP improvement or maintenance was not sufficiently resolved within the time frames required by the SWPPP. Some of the longer lasing deficiency items included:

- Covering inactive slopes behind the Central Compressor Station (reported 9 times over a 19 week period);
- Bury toe of silt fence along bottom edge of slope at P-32 Fill Site (reported 13 times over a 21 week period);
- Cover inactive slope and place fiber rolls every 10 feet at the Natural Substation (reported 7 times over a 10 week period); and
- Provide either chemical or mechanical cover for inactive slopes at P-32 Fill Site (reported 4 times over a 7 week period).

The figure in Attachment 1 clearly shows BMP deficiencies were a reported problem that was left unaddressed by SCG for consecutive weeks-to-months. The substantial number (22) of recurring deficiencies and their multi-week duration demonstrate that SCG's SWPPP was not being followed, despite being identified as a high priority by the CPUC/E&E Team (see documentation in NCR-3, NCR-4, and NCR-6). Attachment 2 shows photo documentation of example recurring BMP deficiencies.

Without all proper BMPs in place and maintained, erosion and sediment transport during storms is more likely and the risk to hydrological features and biological resources is greater. It is difficult-to-impossible to effectively implement and maintain BMPs if waiting to do so until immediately before a predicted storm due to the uncertainty involved in storm prediction and the labor involved in BMP installation. Thus, BMPs must be implemented and maintained regularly, as required by the SWPPP. In addition, erosion and sediment transport that could have been prevented by implementing proper BMPs is a violation of APM GE-2. SCG's pattern of inadequate BMP implementation and maintenance created the potential for storms to cause risk to environmental resources (and in some cases did impact resources, as described in previous NCRs) and is evidence of a trend toward placing resources at unnecessary risk. These characteristics constitute a Level 2 Non-Compliance.

Pertinent Plans/Permits/Mitigation Measures:

- By failing to promptly address identified BMP deficiencies and maintenance items required in the Storm Water Pollution Prevention Plan, SCG did not follow their NPDES General Permit
- By failing to provide adequate BMPs to prevent erosion at various locations around the project site, SCG violated APM GE-2
- By failing to follow their SWPPP and APM GE-2, SCG did not follow the Aliso Canyon Turbine Replacement Project's Mitigation Monitoring Compliance and Reporting Plan (MMCRP).

Proposed Resolution:

The CPUC/E & E Compliance Monitor and CPUC/E & E Compliance Team regularly discussed BMP deficiency items with SCG from November 2014 through May 2015. The CPUC/E&E Team requested that SCG send copies of their weekly SWPPP reports beginning in November 2014 and continued to document BMP deficiencies observed during weekly site visits by the Compliance Monitor. After storms occurred in March 2015, the CPUC/E&E Team requested SCG document corrective actions taken to address BMPs and report them in a Weekly BMP tracker. With implementation of the weekly tracker, SCG began to regularly address BMP deficiencies within the 72-hour timeframe. Beginning in May 2015, SCG's timely response to BMP deficiencies identified by the QSP and the CPUC/E & E Compliance Monitor indicates a greater commitment to compliance with SWPPP BMP maintenance and deficiency requirements and the MMCRP (e.g., AMP GE-2).

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	3/15/2016	Lara Rachowicz	Lara Rachowicz	
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)	3/25/16	Andrew Barnsdale		
SoCalGas/SCE Environmental Compliance Manager (if applicable)				

Prepared by: Andres Estrada, Lara Rachowicz **Date:** 12/8/15

Attachment 1

Figure 1: Recurring BMP Deficiencies by Week (November 2014 – May 2015)

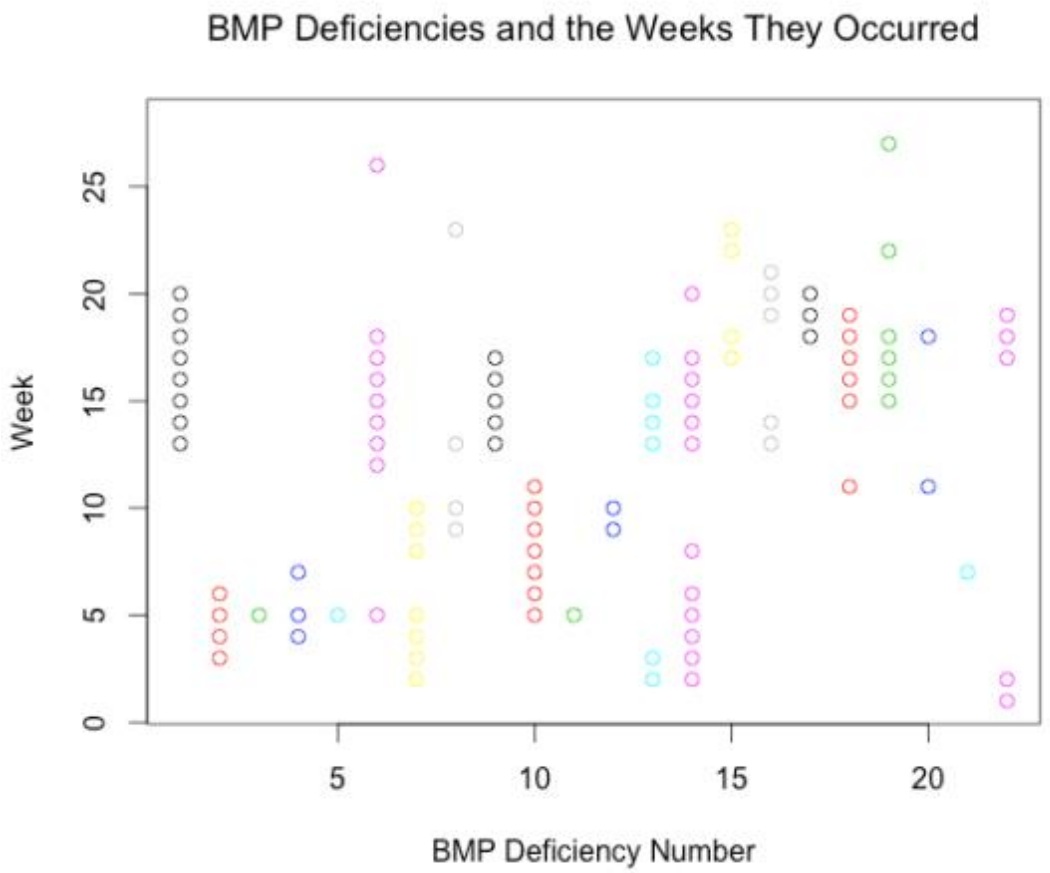

Figure 1: Repeated Best Management Practice (BMP) Deficiency Items for SoCalGas between November 3, 2014 (week 0) and May 19, 2015 (week 28). Weekly Storm Water Pollution Prevention (SWPPP) Reports, Pre-Storm and Post-Storm SWPPP Reports, and Rain Event Action Plans (REAPs) are completed by SCG's Qualified SWPPP Practitioner (QSP). In each report the QSP identifies BMPs that need to be fixed, implemented, or changed. The ACTR Project's SWPPP requires that within 72 hours BMP deficiencies must begin to be addressed and should be fully addressed "as soon as possible." Figure 1 shows that throughout the storage field, the same BMP deficiency was left unaddressed for multiple weeks and in some cases more than a month. *Note: repeated BMP deficiencies associate with PS-42 Fill Site that were included under NCR-06 are not included in this dataset.*

BMP Deficiency Number	Deficiency Item
1	Central Compressor Station (CCS): Maintain silt fences and provide cover for inactive slopes at CCS/Tie-In Area
2	CCS: Cover inactive stockpiles prior to rain events. Place straw wattles around the stockpile at all times
3	CCS: Install BMPs, gravel check dams at toe and foot of v-ditch
4	CCS: Add gravel bags at inlets for storm water runoff
5	CCS: Debris built up on gravel bags;

BMP Deficiency Number	Deficiency Item
12	PS-42 Staging Area: Repair erosion rills under straw wattles
13	Admin/IM Buildings: Cover inactive slopes at Management and Crew-shift Office Buildings
14	P-32 Fill Site: Bury toe of silt fence and provide cover
15	P-32 Fill Site: Provide either chemical or mechanical cover for inactive slopes
16	P-32 Fill Site: Place fiber rolls along

BMP Deficiency Number	Deficiency Item
	Remove debris from channel
6	CCS: Cover inactive slopes behind the site
7	PS-42 Rock Staging Area: Repair and Maintain Silt fencing* Was fixed on 11/12/14. QSP recommends using straw wattles instead.
8	PS-42 Rock Staging Area: Repair or replace plastic over stockpile
9	PS-42 Rock Staging Area: Provide Cover for inactive stockpile
10	PS-42 Fill Site: Repair erosion rill on eastern slope and maintain straw wattles
11	PS-42 Staging Area: Cover stockpiles and place straw wattles around them

BMP Deficiency Number	Deficiency Item
	dirt/vegetation boundary
17	P-32 Fill Site: Repair berm to prevent discharge at drain
18	Natural Substation: Provide cover for inactive slope and place fiber rolls every 10 feet/trench in fiber rolls
19	Natural Substation: Trench Fiber Rolls
20	Natural Substation: Repair retention basin berm and reset fiber rolls
21	Miscellaneous: Provide berms/checks on slope to concrete box
22	P-41 Fill Site: Provide either chemical or mechanical cover for inactive slopes and place fiber rolls

Attachment 2

Representative Photos of Recurring BMP Deficiencies Documented in SCG's SWPPP Reports

Photo 1: Maintain silt fence at P-32 Fill Site, November 11, 2014

Photo 2: Maintain silt fence at P-32 Fill Site, January 26, 2015

Photo 3: Provide cover for inactive slope and place fiber rolls every 10 ft. and trench in fiber rolls at the Natural Substation, February 9, 2015

Photo 4: Provide cover for inactive slope and place fiber rolls every 10 ft. and trench in fiber rolls at the Natural Substation, February 23, 2015

Photo 5: Provide cover for an inactive stockpile at the PS-42 Rock Staging Area, January 26, 2015

Photo 6: Provide cover for an inactive stockpile at PS-42 Rock Staging Area, February 17, 2015

Photo 7: Provide either chemical or mechanical cover for inactive slopes at the Central Compressor Station, January 26, 2015

Photo 8: Provide either chemical or mechanical cover for inactive slopes at the Central Compressor Station, February 3, 2015