



Mesa 500-kV Substation Project Construction Non-Compliance Report

Incident Date:	March 2018 and July 2018	Report No.:	NCR-002
Date Submitted:	8/20/18	Location:	Substation
Level:	Level 2	Relevant Plan/Measure:	MM HAZ-3
Current Land Use:	Mesa Substation; SCE right-of-way	Sensitive Resources:	N/A

Description of Incident:

On March 6, 2018, Southern California Edison (SCE) received delivery of the B-bank transformers for the 66-kilovolt (kV) switchracks, which were already oil-filled. The week of July 24, 2018, SCE contractors oiled the A-bank transformers for the 66-kV switchracks.

Pertinent Plans/Permits/Mitigation Measures:

The California Public Utilities Commission (CPUC) approved a Permit to Construct for the Mesa 500-kV Substation (Mesa Substation) Project. As part of this action, the CPUC certified the Final Environmental Impact Report (Final EIR) for the Mesa Substation Project and adopted the Mitigation Monitoring and Reporting Plan (MMRP) presented in Chapter 8 of the Final EIR. A Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) was created based on the Final EIR's MMRP and serves as a working guide for maintaining environmental compliance for the Mesa Substation Project. The mitigation measures (MMs) and applicant proposed measures (APMs) within the MMCRP are required to be followed by SCE, including the following:

MM HZ-3: Spill Prevention, Control, and Countermeasure Plan. SCE shall prepare a site-specific Spill Prevention, Control, and Countermeasure (SPCC) plan that identifies spill response, prevention measures, and best management practices (BMPs). SCE shall indicate site-specific physical conditions that could exacerbate spills, such as drainages to the nearest waterbodies. SCE shall name a representative that will be responsible for verifying that construction and operation activities adhere to the SPCC plan, including implementation of BMPs. SCE shall submit the SPCC plan to CPUC at least 30 days prior to delivery of any additional transformer oil to the site.

MM HZ-3 requires SCE to submit the SPCC plan to CPUC at least 30 days prior to delivery of any additional transformer oil to the site. SCE failed to submit the SPCC plan to CPUC at least 30 days prior to delivery of the oiled B-bank transformers and the oiling of the A-bank transformers. Since these events constitute the arrival of "additional transformer oil to the site," and SCE failed to provide the SPCC plan to CPUC within 30 days prior to each event, SCE is in noncompliance with MM HZ-3.

The intent of MM HZ-3 is to provide CPUC with an SPCC plan that accurately portrays current and reasonably foreseeable conditions of the Mesa Substation, as described in the Final EIR for the Mesa Substation Project. Module 2 of the SPCC plan that SCE submitted on August 15, 2018 (Module 2, dated May 30, 2014 and Module 1, dated August 2018) is written for the original, Existing Mesa Substation, and does not represent current onsite conditions. Therefore, it is not site-specific, as required by MM HZ-3. Module 1, although updated more recently than Module 2, also contains no site-specific information.

In addition, the 2014 SPCC plan is relevant to operations procedures and activities, not construction. Therefore, the representative that is be responsible for verifying that activities adhere to the SPCC plan identified in Module 2 may not be the same individual responsible for implementation these activities during construction.

Taken together, the fact that SCE twice failed to submit a site-specific SPCC plan to CPUC 30 days prior to the delivery of additional transformer oil onsite, and the fact that the current working draft of the SPCC plan is missing elements required by MM HZ-3, these failures and oversights result in a Level 2 Non-Compliance.

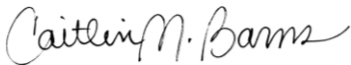

Proposed Resolution:

SCE shall submit an updated SPCC plan (Module 2) that includes the following information:

- Updated substation layout (e.g., site-specific physical conditions that could exacerbate spills, such as drainages to the nearest water bodies)
- Accurate volumes of transformer oil in the Oil Inventory Table (as of August 2018)
- Name and contact information for the representative responsible for verifying SPCC plan implementation during construction

Recommended Timeline for Follow-up:

SCE shall submit the updated SPCC plan to CPUC for review by September 7, 2018.

Approvals	Date	Name (print)	Signature	Comments
CPUC Compliance Manager	8/17/18	Caitlin Barns		
CPUC Compliance Monitor (if applicable)				
CPUC Project Manager (if applicable)		Lisa Orsaba		
SCE Environmental Project Manager (if applicable)				

Prepared by: Caitlin Barns

Date: 8/20/18

Non-Compliance Level	Example
<p>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.</p>	<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.
<p>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.</p>	<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 Incident); iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk.