

DOCKETED

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Document Title:	Monthly Compliance Report December 2018
Description:	Monthly Compliance Report December 2018- Demolition of Encina Power Station
Filer:	Anwar Ali
Organization:	Carlsbad Energy Center LLC
Submitter Role:	Commission Staff
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**Cabrillo I Power LLC for
Carlsbad Energy Center Project**
4600 Carlsbad Blvd.
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January 13, 2020

Mr. Anwar Ali
Compliance Project Manager
Carlsbad Energy Center Project (07-AFC-06C)
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814

**RE: CARLSBAD ENERGY CENTER PROJECT, DOCKET NO. 07-AFC-06C
PHASE IV - DEMOLITION OF ENCINA POWER STATION
CONDITION OF CERTIFICATION, COM-6
DECEMBER 2019, MONTHLY COMPLIANCE REPORT**

Dear Dr. Ali:

Carlsbad Energy Center LLC ("Project Owner") submits the December 2019 Monthly Compliance Report (MCR) in compliance with the AFC Docket No. 07-AFC-06C, Conditions of Certification (COCs) COM-6 for the amended Carlsbad Energy Center Project (ACECP) located at 4600 Carlsbad Boulevard, Carlsbad, California. Included in this MCR are the following documents:

- Updated Compliance Matrix,
- Air Quality Construction/Demolition Compliance summary,
- Summary of noise hotline calls,
- Construction Safety Supervisor monthly report.

There was limited personnel and equipment mobilization during December 2019 resulting in no waste disposal, fugitive dust emission, demolition activities, soil disturbance or grading activities, or use of any non-potable water.

If you have any questions or comments, please do not hesitate to contact me at (760) 930-1505.

Sincerely,

A handwritten signature in black ink, appearing to read "George L. Piantka". The signature is somewhat stylized and includes a flourish at the end.

George L. Piantka, PE
Sr. Director, Regulatory Environmental Services
NRG West Region

Attached: Carlsbad Energy Center Project (07-AFC-06C), California Energy Commission, Monthly Compliance Report, December 2019

cc: File



**Carlsbad Energy
Center Project –
Encina Power Station
Demolition
(07-AFC-06C)**

**California Energy Commission
Monthly Compliance Report
COM-6**

December 2019

***Submitted by: Cabrillo Power I LLC
Date Submitted: 01-13-2020***

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- Attachment B: COMPLIANCE-6:Project Schedule, December 2019
- Attachment C AQ-SC3: Air Quality Construction Compliance Summary, December 2019
- Attachment D: BIO-6: Phase II Biological Resources Monthly Compliance Report –*To Start in January 2020*
- Attachment E: CUL-5 and PAL-5:Certification of Completion, Worker Environmental Awareness Program
- Attachment F CUL-6/PAL-6: Paleontological Resource Monitoring
- Attachment G COMPLIANCE-6: Noise Hotline Calls, December 2019
- Attachment H TRANS-5:Roadway Inspection
- Attachment I TRANS-6: Summary Transportation Permits
- Attachment J TRANS-8: Encroachment Permits Statement
- Attachment K SOIL&WATER-2: Construction Water Usage Summary
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- Attachment L GEN-2 and TSE-1: Master Drawing List Update
- Attachment M GEN-3: Proof of DCBO Payment
- Attachment N CIVIL-1, GEN-6, MECH-1: DCBO Plan Approvals and Mechanical Inspections
- Attachment O WORKER SAFERY-3: Construction Safety Supervisor Monthly Report
- Attachment P CIVIL-3 and STRUC-2: Non-Conformance Report Log

I. Summary

a. Pre-Construction Status

The Carlsbad Energy Center LLC (Project Owner) received a letter from the California Energy Commission compliance project manager (CPM) authorizing site mobilization and the start of demolition for above grade fuel oil tanks 5, 6, and 7 on December 8, 2014. The Project Owner received a letter from the CPM authorizing demolition of above grade fuel oil tanks 1, 2, and 4, and soil remediation on August 31, 2015. The Project Owner received a letter from the CPM authorizing below grade demolition and berm removal on January 15, 2016. The below-grade demolition and berm removal contractor mobilized the week of February 1, 2016 and began below-grade demolition work on February 5, 2016. Below-grade demolition work was completed in May 2016, and the contractor demobilized on May 12, 2016.

b. Construction Status

Phase I activities began December 19, 2014, and were completed in May 2016. The Project Owner completed all compliance activities and condition of certification submittals necessary to enable the Phase II start of construction in May 2016. The California Energy Commission approved the start of construction on June 6, 2016. Phase II of the Amended CECP began in February 2017 and was completed with the Commercial Start date for CECP on December 12, 2018.

c. Demolition Status

Phase III activities began December 12, 2018, with the retirement of the Encina Power Station and decommissioning completed by Cabrillo Power I LLC (owner of Encina Power Station) in October 2019. The Project Owner is completing all compliance activities and condition of certification submittals necessary to enable the Phase IV start of demolition.

d. Revised/Updated Schedule

Per Condition of Certification (COC) COM-5, the Compliance Matrix and COC deliverables are provided in **Attachment A. Attachment**

B provides a schedule of project milestones for demolition, remediation, and construction.

e. **Explanation of Significant Permitting Activities and Changes to Schedule (as applicable)**

Since the November 12, 2015 CEC Commission adoption of the Order confirming that the August 3, 2015 Commission Decision stands as docketed with no modifications required, no significant permitting activities have taken place.

The updated project schedule is provided in **Attachment B**.

II. List of documents submitted to meet specific conditions

- a. AQ-SC2: Air Quality Demolition Mitigation Plan
- b. AQ-SC3: Construction Fugitive Dust Control - Air Quality Compliance Monthly Report.
- c. AQ-SC4: Dust Plume Response Requirement - Air Quality Compliance Monthly Report.
- d. AQ-SC5: Diesel-Fueled Engine Control - Air Quality Compliance Monthly Report.
- e. GEN-1: CBO Notice
- f. NOISE-1: Community Mailer and Noise Complaint Hotline Number
- g. NOISE-3: Noise Control Program
- h. SOIL&WATER-2: Non-Potable Construction Water Use Plan
 - i. SOIL&WATER-2&6: Construction water usage summary.
- i. SOIL&WATER-4&9: SDRWQCB email dated 11/22/2019
- j. SOIL&WATER-9: Wastewater disposal summary
- k. TRANS-1: Demolition Traffic Control Plan
- l. TRANS-7: Demolition Parking and Staging Plan
- m. WASTE-5: Demolition Waste Management Plan
- n. WORKER SAFETY-1: Demolition Safety and Health Program
- o. WORKER SAFETY-3: Construction Safety Supervisor monthly report

III. Updated Compliance Matrices

The Compliance Matrix updated to reflect the Amended CECP is included in **Attachment A**.

IV. List of conditions satisfied during reporting period including reference to actions which satisfied certification

Air Quality: AQ-SC3, AQ-SC4, and AQ-SC5 - Air Quality Construction Compliance inspections and report. See **Attachment C**.

AQ-SC12 - Provide status on the start and conclusion of each phase of work. See **Attachment C**.

COM-11/NOISE-1: Noise hotline log and complaint resolution process. See **Attachment G**.

TRANS-5: Performed roadway inspections. See **Attachment H**.

WORKER SAFETY-3: Construction Safety Supervisor Monthly Report. See **Attachment O**.

V. List of submittal deadlines missed during reporting period including explanation and estimate of when information will be provided

None

VI. Cumulative list of approved changes to conditions of certification

The California Energy Commission approved changes to the conditions of certifications docketed on August 3, 2015. An updated compliance matrix with amended conditions of certification for demolition is provided in **Attachment A**.

VII. List of any filings with, or permits issued by, other governmental agencies during the month

None

VIII. Project compliance activities over next two months including changes to schedule

The Project Owner will make the following compliance filings, as needed, over the next two months:

- a. AQ-SC1: Air Quality Construction Mitigation Manager (AQCMM) will implement the monitoring and reporting requirements of AQ-SC2, AQ-SC3, AQ-SC4, and AQ-SC5.
- b. BIO-5: Worker Environmental Awareness Plan training.
- c. BIO-6: Monitoring and reporting as required per the BRMIMP.
- d. COMPLIANCE-6: Submit Monthly Compliance Reports.
- e. SOIL&WATER-2: Water usage summary.
- f. TRANS-5: Inspection reports on roadway conditions.
- g. TRANS-6: Provide summary of overweight or oversized vehicle permits as needed.
- h. TRANS-8: Provide a summary of encroachment permits obtained or utilized during the reporting month.
- i. WASTE-1: Submit correspondence with San Diego County Department of Environmental Health as needed.
- j. WORKER SAFETY-5: As needed worker training on Automated External Defibrillator (AED) locations.

IX. Additions to on-site compliance file

Files are maintained onsite on a regular basis as COCs are implemented.

X. List of complaints, notices of violation, official warnings, citations received during month, description of resolutions of any resolved complaints and status of any unresolved complaints

No violations, official warnings, or citations related to the demolition of the Encina Power Station were received in December 2019. A summary table of all calls logged and responded to is included in **Attachment G**.

ATTACHMENT A

**COMPLIANCE-5 AND COMPLIANCE-6
KEY EVENTS AND COMPLIANCE MATRIX
DECEMBER 2019**

CEC CONDITIONS OF CERTIFICATION

TECHINAL NAME	COC Number	Subtask	Condition Type	Deliverable Req.	Description	Comments	Date Submitted	Dated Approved by CEC
AQ-SC	1		Air Quality Manager	Y	Air Quality Construction/Demolition Mitigation Manager (AQCMM): The project owner shall designate and retain an on-site AQCMM who shall be responsible for directing and documenting compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5 for the entire project site and linear facility construction/demolition. The on-site AQCMM may delegate responsibilities to one or more AQCMM Delegates. The AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and linear facilities and shall have the authority to stop any or all construction/demolition activities as warranted by applicable construction/demolition mitigation conditions. The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition. The AQCMM shall not be terminated without written consent of the Compliance Project Manager (CPM).		8/26/2019	9/20/2019
AQ-SC	2		Air Quality Plan	Y	Air Quality Construction/Demolition Mitigation Plan (AQCMP): The project owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5.	Submitted to CEC on 10/16/19. Resubmitted with updates per CEC request 12/28/19.	10/16/2019, resubmitted 12/28/19	
AQ-SC	3	a	Air Quality Plan	Y	Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the project site and linear facility routes. Any deviation from the following mitigation measures shall require prior CPM notification and approval. A. All unpaved roads and disturbed areas in the project and laydown construction/demolition sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering may be reduced or eliminated during periods of precipitation. B. No vehicle shall exceed 10 miles per hour on unpaved areas within the project and laydown construction/demolition sites. C. The construction/demolition site entrances shall be posted with visible speed limit signs. D. All construction/demolition equipment vehicle tires shall be inspected and washed as necessary to be cleaned and free of dirt prior to entering paved roadways. E. Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station. F. All unpaved exits from the construction/demolition site shall be graveled or treated to prevent track-out to public roadways. G. All construction/demolition vehicles shall enter the construction/demolition site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM. H. Construction/demolition areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent runoff to roadways. I. All paved roads within the construction/demolition site shall be swept at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs to prevent the accumulation of dirt and debris. J. At least the first 500 feet of any public roadway exiting the construction/demolition site shall be swept visually clean, using wet sweepers or air filtered dry vacuum sweepers, at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs or on any other day when dirt or runoff from the construction/demolition site is visible on the public roadways.	included with AQ-SC2		
AQ-SC	3	b	Air Quality Plan		K. All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered or shall be treated with appropriate dust suppressant compounds. L. All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause visible emissions shall be provided with a cover or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard. M. Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction/demolition areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation. N. Disturbed areas will be re-vegetated as soon as practical. O. Haul trucks used during the Encina Power Station demolition shall be limited to traveling on paved or graveled surfaces at all times within the boundary of the Encina Power Station property. The fugitive dust requirements listed in this condition may be replaced with as stringent or more stringent methods as required by SDAPCD Rule 55.	included with AQ-SC2		
AQ-SC	4	a	Air Quality Plan	N	Dust Plume Response Requirement: The AQCMM or Delegate shall monitor all construction/demolition activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported: (1) off the project site, (2) 200 feet beyond the centerline of the construction of linear facilities, (3) within 100 feet upwind of any regularly occupied structures not owned by the project owner, or (4) within 50 feet upwind of the I-5 freeway indicate that existing mitigation measures are not resulting in effective mitigation. The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes, other than those occurring upwind of the I-5 Freeway, are observed: Step 1: The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination. Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression if Step 1 specified above fails to result in adequate mitigation within 30 minutes of the original determination. Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shut-down source. The owner/operator may appeal to the CPM any directive from the AQCMM or Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.	included with AQ-SC2		

CEC CONDITIONS OF CERTIFICATION

AQ-SC	4	b	Air Quality Plan		The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes occurring within 50 feet upwind of the I-5 Freeway are observed: Step 1: The AQCMM or Delegate shall immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on the I-5 freeway. The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of the I-5 freeway but are not causing obscuration of visibility to drivers. Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective. Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes that could impact visibility on the I-5 Freeway will not occur upon restarting the shut-down fugitive dust source.			
AQ-SC	5	a	Air Quality Plan	Y	Diesel-Fueled Engine Control: The AQCMM shall submit to the CPM, in the Monthly Compliance Report, a construction/demolition mitigation report that demonstrates compliance with the AQCMP mitigation measures for purposes of controlling diesel construction/demolition-related emissions. The following off-road diesel construction/demolition equipment mitigation measures shall be included in the Air Quality Construction Mitigation Plan (AQCMP) required by AQ-SC2, and any deviation from the AQCMP mitigation measures shall require prior CPM notification and approval. a) All diesel-fueled engines used in the construction/demolition of the facility shall have clearly visible tags issued by the on-site AQCMM showing that the engine meets the conditions set forth herein. b) All construction/demolition diesel engines with a rating of 50 hp or higher shall meet, at a minimum, the Tier 4 or 4i California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1), unless a good faith effort to the satisfaction of the CPM that is certified by the on-site AQCMM demonstrates that such engine is not available for a particular item of equipment. In the event that a Tier 4 or 4i engine is not available for any off-road equipment larger than 50 hp, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 3 levels unless certified by engine manufacturers or the on-site AQCMM that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is "not practical" for the following, as well as other, reasons. 1. There is no available retrofit control device that has been verified by either the California Air Resources Board or U.S. Environmental Protection Agency to control the engine in question to Tier 3 equivalent emission levels and the highest level of available control using retrofit or Tier 2 engines is being used for the engine in question; or 2. The construction/demolition equipment is intended to be on site for ten working days or less. 3. The CPM may grant relief from this requirement if the AQCMM can demonstrate a good faith effort to comply with this requirement and that compliance is not practical.	included with AQ-SC2		
AQ-SC	5	b	Air Quality Plan		c) The use of a retrofit control device may be terminated immediately, provided that the CPM is informed within ten working days of the termination and that a replacement for the equipment item in question meeting the controls required in item "b" occurs within ten days of termination of the use, if the equipment would be needed to continue working at this site for more than 15 days after the use of the retrofit control device is terminated, if one of the following conditions exists: 1. The use of the retrofit control device is excessively reducing the normal availability of the construction/demolition equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure. 2. The retrofit control device is causing or is reasonably expected to cause engine damage. 3. The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public. 4. Any other seriously detrimental cause which has the approval of the CPM prior to implementation of the termination. d) All heavy earth-moving equipment and heavy duty construction/demolition-related trucks with engines meeting the requirements of (b) above shall be properly maintained and the engines tuned to the engine manufacturer's specifications. e) All diesel heavy construction/demolition equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. f) Construction/demolition equipment will employ electric motors when feasible.			
AQ-SC	12		MCR	Y	The project owner shall not allow the overlap of specific construction and demolition phase activities. The following activities shall not be conducted concurrently with any of the other listed activities: 1. ASTs 5, 6, and 7 demolition (licensed CECP activity) 2. ASTs 1, 2, and 4 demolition and berm removal (PTR described activities). 3. Amended CECP construction (PTA described activities). 4. EPS demolition (PTA and Encina Power Station Demolition Plan described activities). In addition, the gas turbines initial commissioning activity and the EPS demolition activity shall not be performed concurrently.	N/A		
AQ-SC	13		MCR	Y	The project owner shall not implode or fell any concrete or mortar structure, such as the main exhaust stack or the power plant building, during the demolition of the Encina Power Station.			

CEC CONDITIONS OF CERTIFICATION

GEN	1	c	CBO	N	<p>The project owner shall design, construct, and inspect the project in accordance with the 2013 California Building Standards Code (CBSC), also known as Title 24, California Code of Regulations, which encompasses the California Building Code (CBC), California Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and all other applicable engineering laws, ordinances, regulations and standards (LORS) in effect at the time initial design plans are submitted to the chief building official (CBO) for review and approval (the CBSC in effect is the edition that has been adopted by the California Building Standards Commission and published at least 180 days previously). The project owner shall ensure that all the provisions of the above applicable codes are enforced during the construction, addition, alteration, moving, demolition, repair, or maintenance of the completed facility, including the demolition of above-ground fuel oil storage tanks 1, 2, and 4 (ASTs 1, 2, and 4), and the demolition of the Encina Power Station (EPS) (2013 CBC, Appendix Chapter 1, §1.1.3, Scope). All transmission facilities (lines, switchyards, switching stations and substations) are covered in the conditions of certification in the Transmission System Engineering section of this document.</p> <p>In the event that the initial engineering designs are submitted to the CBO when the successor to the 2013 CBSC is in effect, the 2013 CBSC provisions shall be replaced with the applicable successor provisions. Where, in any specific case, different sections of the code specify different materials, methods of construction or other requirements, the most restrictive shall govern. Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall govern.</p> <p>The project owner shall ensure that all contracts with contractors, subcontractors, and suppliers clearly specify that all work performed and materials supplied comply with the codes listed above.</p>	<p>Comments Received from CBO on Execution Plan on 12/4/19 Comments returned to CBO on 1-9-20</p>	01/09/2020	
GEN	1	d	Notice	N				
HAZ	7		Security Plan	Y	<p>Prior to commencing tank demolition, a site-specific Demolition and Construction Site Security Plan for the tank demolition and construction phases shall be prepared and made available to the CPM for review and approval. The Construction Security Plan shall include the following:</p> <ol style="list-style-type: none"> 1. perimeter security consisting of fencing enclosing the demolition and construction areas; 2. security guards; 3. site access control consisting of a check-in procedure or tag system for demolition and construction personnel and visitors; 4. written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on-site or off-site; 5. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency; and 6. evacuation procedures. 	Submitted to CEC	11/6/2019	
NOISE	1		Notice	Y	<p>At least 15 days prior to the start of any demolition activities associated with the amended CECP, the project owner shall notify the city of Carlsbad and all residents within one-half mile of the site, by mail or other effective means, of the commencement of project demolition and construction. At the same time, the project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the demolition, construction, and operation of the amended CECP and include that telephone number in the above notice. If the telephone is not staffed 24 hours per day, the project owner shall include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This telephone number shall be posted at the project site during construction in a manner visible to passersby. This telephone number shall be maintained until the project has been operational for at least one year, and all subsequent demolition activities at the Encina Power Station have been completed.</p>	<p>Noise Notification has been completed and mailers sent out to public/residents within one mile on 9/23. Notice sent to CEC on 9/25/19</p>	9/25/2019	12/18/2019
NOISE	2		Hot Line Response	Y	<p>Throughout the demolition of above-ground fuel oil storage tanks 1, 2, 4, 5, 6, and 7 (ASTs 1, 2, 4, 5, 6, and 7), construction and operation of the amended CECP, and demolition of the Encina Power Station the project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The project owner or authorized agent shall:</p> <ul style="list-style-type: none"> • Use the Noise Complaint Resolution Form (below), or a functionally equivalent procedure acceptable to the CPM, to document and respond to each noise complaint; • Attempt to contact the person(s) making the noise complaint within 24 hours (within 12 hours if the complaint is related to nighttime concrete pour); • Conduct an investigation to determine the source of noise related to the complaint; • Take all feasible measures to reduce the noise at its source if the noise is project related; and • Submit a report documenting the complaint and the actions taken. The report shall include: a complaint summary, including final results of noise reduction efforts and, if obtainable, a signed statement by the complainant stating that the noise problem is resolved to the complainant's satisfaction. 	Hot Line Established	8/13/2019	
NOISE	3		Letter	Y	<p>The project owner shall submit to the CPM for review and approval a noise control program and a statement, signed by the project owner's project manager, verifying that the noise control program will be implemented throughout the demolition of ASTs 5, 6, and 7, and construction and demolition activities associated with of the amended CECP. The noise control program shall be used to reduce employee exposure to high noise levels during demolition and construction in accordance with Title 8, California Code of Regulations, sections 5095-5099, and Title 29, Code of Federal Regulations, section 1910.95</p>	Prepared, submitted to CEC, and approved on 10/2/19	8/26/2019	10/3/2019

CEC CONDITIONS OF CERTIFICATION

NOISE	6		Letter	Y	Noisy construction work relating to any project features shall be restricted to the times of day delineated below: Weekdays 7:00 a.m. to 6:00 p.m. Saturdays 8:00 a.m. to 6:00 p.m. Haul trucks and other engine-powered equipment shall be equipped with mufflers that meet all applicable regulations. Haul trucks shall be operated in accordance with posted speed limits. Truck engine exhaust brake use shall be limited to emergencies. For purposes of this condition, "noisy construction work" shall be defined as any project-related work that draws a noise complaint caused by the construction or demolition activities associated with the CECP, as opposed to another source, as verified by the CPM, pursuant to NOISE-2.			
SOIL&WATER	2	a	Plan	Y	Potable water shall not be used for any construction activity, including EPS demolition activities, that is suitable for non-potable water use if a non-potable water source is available at the project site. Prior to site mobilization, the project owner shall submit to the CPM a Non-Potable Construction Water Use Plan (plan) for the supply and use of non-potable water in construction activities. The plan shall consider the use of recycled water available at the site. The plan shall specify those construction activities that would use non-potable water and those construction activities that would use potable water. Potable water use for EPS demolition activities that are suitable for non-potable water shall count toward the cumulative total limit, in accordance with SOIL&WATER-6.	10/11/19 - NRG response submitted to CEC. Status request from CEC sent 11/12/19	10/11/2019	12/18/2019
SOIL&WATER	2	b	MCR	Y				
SOIL&WATER	4	a	Permit	Y	The project owner shall submit to the San Diego Regional Water Quality Control Board (SDRWQCB) all information required by the SDRWQCB to obtain a Waste Discharge Requirements (WDR) Order for the discharge of EPS demolition wastewater to the Pacific Ocean in accordance with NPDES requirements. The project owner shall submit to the CPM all copies of correspondence between the project owner and the SDRWQCB regarding the WDR Order within 10 days of its receipt or submittal.	SDRWQCB concurrence request for use of existing Industrial Permit and Storm Water Permit submitted 10/31/19. NRG submitted email to CEC from SDRWQCB in regards to permits on 11/22/2019.	11/22/2019	11/27/2019
SOIL&WATER	6	a	Water Use	Y	During normal operation the project shall use no more than three acre-feet per year (AFY) of potable water for drinking, sanitary, and fire protection testing purposes. The project shall use recycled water for all industrial and landscape irrigation purposes during operation of the CECP, unless potable water is needed for emergency backup use. For the purpose of this condition, the term emergency shall mean the inability of the CECP to take, or for the city of Carlsbad to deliver, recycled water to the CECP in a quantity sufficient to meet CECP demand due to Acts of God, natural disaster, and other circumstances beyond the control of the project owner, including interruption of recycled water service and it is necessary for the CECP to prepare to or continue to operate to serve a peaking load. If more than 3AFY of potable water is needed during operation for non-emergency uses, the owner shall be required to file a formal petition to amend the project. If the CECP requires potable water for EPS demolition and emergencies that will cumulatively exceed 300 acre-feet, during the life of the project, the project owner shall file a petition to amend. All emergency water use shall be reported in annual compliance reports. Reported values shall include monthly			
SOIL&WATER	6	b	Reporting	Y				
SOIL&WATER	9	a	Permit Reporting	Y	Prior to transport and disposal of any facility construction or demolition-related wastewaters offsite, the project owner shall test and classify the stored wastewater to determine proper management and disposal requirements. The project owner shall provide evidence that wastewater is disposed of at an appropriately licensed facility. The project owner shall ensure that the wastewater is transported and disposed of in accordance with the wastewater's characteristics and classification and all applicable LORS (including any CCR Title 22 Hazardous Waste and Title 23 Waste Discharges to Land requirements). Where discharge of wastewater must comply with the San Diego Regional Water Quality Control Board (SDRWQCB) and State Water Resources Control Board regulatory requirements, the project owner shall submit a Report of Waste Discharge (ROWD) to the compliance project manager (CPM) and SDRWQCB for determination of which regulatory waiver or permit applies to the proposed discharges. The project owner shall pay all necessary fees for filing and review of the ROWD and all other related fees. Checks for such fees shall be submitted to the SDRWQCB and shall be payable to the State Water Resources Control Board. The project owner shall ensure compliance with the provisions of the waiver or permit applicable to the discharge. Where the regulatory requirements are not applied pursuant to a National Pollutant Discharge Elimination System permit, it is the Commission's intent that the requirements of the applicable waiver or permit be enforceable by both the Commission and the SDRWQCB. In furtherance of that objective, the Commission hereby delegates the enforcement of the waiver or permit requirements, and associated monitoring, inspection, and annual fee collection authority, to the SDRWQCB. The CPM and SDRWQCB shall confer with each other and coordinate, as needed, in the enforcement of the requirements.	ROWD not needed as existing permits (Encina industrial NPDES permit and Construction General NPDES Permit for stormwater discharges) will be used to confirm compliance with COC. NRG submitted email to CEC from SDRWQCB in regards to permits on 11/22/2019.	11/22/2019	11/27/2019
SOIL&WATER	9	b	MCR			Provided in MCR		

CEC CONDITIONS OF CERTIFICATION

SOIL&WATER	9	c	Permit			Permit(s) provided when obtained from SDRWQCB		
SOIL&WATER	9	d	Reporting			As needed		
TRANS	1		Permit	Y	The project owner shall consult with the City of Carlsbad and prepare and submit to the city of Carlsbad for review and comment and the Compliance Project Manager (CPM) for approval a construction/demolition traffic control plan. The plan shall be implemented during all phases of construction/demolition and shall addresses the following issues: <ul style="list-style-type: none"> • timing of truck trips, including heavy equipment and building materials deliveries, especially those that would cross the railroad tracks; • redirecting construction and demolition traffic with a flag person at a minimum for trucks traveling eastbound on Cannon Road from the SDG&E Service Gate to cross the railroad tracks; • signing, lighting, and traffic control device placement if required; • need for construction work hours and arrival/departure times outside and during peak traffic periods; • insurance of access for emergency vehicles to the project site; • temporary closure of travel lanes; • access to adjacent residential and commercial property during the construction of all pipelines; • specification of construction-related haul routes; and • identify safety procedures for exiting and entering the site access gate. 		10/29/2019, Modified Plan sent 11/14/19	12/12/2019
TRANS	5	a	Reporting	Y	During and following completion of project construction and demolition, the project owner shall repair any damage to roadways affected by construction/demolition activity to pre-project road conditions or better. Restoration of significant damage which could cause hazards (such as potholes, deterioration of pavement edges, or damaged signage) shall take place immediately after the damage has occurred. Prior to the start of demolition and construction, the project owner shall photograph or videotape, all roadways that will be affected by pipeline construction and heavy truck traffic. The project owner shall provide the CPM and the city of Carlsbad with a copy of the images for the roadway segments under its jurisdiction. Also, prior to start of demolition and construction, the project owner shall notify the city about the schedule for project demolition/construction. The purpose of this notification is to allow the city the opportunity to postpone any planned roadway resurfacing and/or improvement projects until after the project demolition/construction has taken place and to coordinate demolition/construction-related activities associated with other projects.		9/16/2019	9/30/2019
TRANS	7		Plan	Y	During project construction/demolition, the project owner shall implement a parking and staging plan for project construction and demolition to enforce a policy that all project-related parking occurs on site or in designated off-site parking areas.		10/16/2019	10/22/2019
WASTE	6		Permit	Y	Prior to demolition of existing structures, the project owner shall complete and submit a copy of a San Diego County Air Pollution Control District (District) Asbestos Renovation and Demolition Notification Form to the CPM and the District for review. The project owner shall remove all asbestos-containing material (ACM) from the site prior to demolition.	Will be provided in January 2020		
WASTE	5	a	Plan		The project owner shall prepare a Demolition and Construction Waste Management Plan for all wastes generated during demolition and construction of the facility and shall submit the plan to the CPM for review and approval. The plan may be submitted in two sections: Demolition activities and Construction activities. Both sections of the plan shall contain, at a minimum, the following: <ul style="list-style-type: none"> • a description of all demolition and construction waste streams, including projections of frequency, amounts generated, and hazard classifications; and • management methods to be used for each waste stream, including temporary on-site storage, housekeeping and best management practices to be employed, treatment methods and companies providing treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/source reduction plans. • a reuse/recycling Debris Management Plan for demolition and construction materials that meets or exceeds the waste diversion goals established by the Integrated Waste Management Compliance Act (Pub. Resources Code, § 41780 et seq.) and CAL Green Title 24, California Code of Regulations, Part 11sections 4.408, 5.408, 301.1.1 and 301.3. 		10/16/2019	11/12/2019
VIS	3	B	Screening		If necessary to provide visual screening of staging activities, equipment and materials in the short term, the project owner shall provide temporary dark-colored, opaque fencing to provide visual screening until landscape screening described above has achieved sufficient maturity to provide visual screening. Existing opaque fencing shall be maintained along the Carlsbad Boulevard frontage of the EPS for the duration of construction and demolition. The project owner shall submit to the CPM for review and approval, and simultaneously to the city of Carlsbad for review and comment, a landscaping plan whose proper implementation will satisfy these requirements. The plan shall include: a) A detailed landscape, grading, and irrigation plan, at a reasonable scale. The plan shall demonstrate how the requirements stated above shall be met. The plan shall provide a detailed installation schedule demonstrating installation of as much of the landscaping as early in the construction process as is feasible in coordination with project construction. The intent of the plan shall be to minimize loss of existing perimeter tree and shrub screening, particularly at the northeast laydown site; and to provide supplemental and replacement plantings as needed to screen staging sites.			

CEC CONDITIONS OF CERTIFICATION

WORKER SAFETY	1	b	Plan	Y	<p>The project owner shall submit to the Compliance Project Manager (CPM) a copy of the Project Demolition and Construction Safety and Health Program containing the following:</p> <ol style="list-style-type: none"> 1. a Demolition and Construction Personal Protective Equipment Program; 2. a Demolition and Construction Exposure Monitoring Program; 3. a Demolition and Construction Injury and Illness Prevention Program; 4. a Demolition and Construction Emergency Action Plan; and 5. a Demolition and Construction Fire Prevention Plan. 6. an Encina Power Station Demolition Plan. <p>The Personal Protective Equipment Program, the Exposure Monitoring Program, and the Injury and Illness Prevention Program shall be submitted to the CPM for review and approval concerning compliance of the program with all applicable safety orders. The Demolition and Construction Emergency Action Plan, the Demolition and Construction Fire Prevention Plan, and an Encina Power Station Demolition Plan shall be submitted to the Carlsbad Fire Department for review and comment prior to submittal to the CPM for approval.</p>		11/6/2019	12/11/2019
WORKER SAFETY	3	a	Supervisor	Y	<p>The project owner shall provide a site Demolition Safety Supervisor (DSS) and a Construction Safety Supervisor (CSS) who, by way of training and/or experience, is knowledgeable of tank demolition, power plant construction activities and relevant laws, ordinances, regulations, and standards; is capable of identifying workplace hazards relating to the demolition and/or construction activities; and has authority to take appropriate action to assure compliance and mitigate hazards. The DSS or CSS shall:</p> <ol style="list-style-type: none"> 1. have overall authority for coordination and implementation of all occupational safety and health practices, policies, and programs; 2. assure that the safety program for the project complies with Cal/OSHA and federal regulations related to power plant projects; 3. assure that all demolition, construction and commissioning workers and supervisors receive adequate safety training; 4. complete accident and safety-related incident investigations and emergency response reports for injuries and inform the CPM of safety-related incidents; and 5. assure that all the plans identified in Conditions of Certification Worker Safety-1 and -2 are implemented. 		10/8/2019	12/11/19 - But need to update all Federal OSHA citations with the appropriate Cal/OSHA code citations
WORKER SAFETY	4		CBO	Y	<p>The project owner shall make payments to the Chief Building Official (CBO) for the services of a Safety Monitor based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. Those services shall be in addition to other work performed by the CBO. The Safety Monitor shall be selected by and report directly to the CBO and will be responsible for verifying that the Construction Safety Supervisor, as required in Condition of Certification Worker Safety-3, implements all appropriate Cal/OSHA and Energy Commission safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities and shall do this during the period of tank demolition/removal, construction of the CECF, and demolition/removal of the EPS.</p>		9/12/2019	
WORKER SAFETY	5		Training	Y	<p>The project owner shall ensure that a portable automatic external defibrillator (AED) is located on site during tank demolition, construction and operations and demolition/removal of the EPS and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functioning at all times. During demolition of the tanks and the EPS, construction and commissioning, the following persons shall be trained in its use and shall be on site whenever the workers that they supervise are on site: the Demolition or Construction Project Manager or delegate, the Demolition or Construction Safety Supervisor or delegate, and all shift foremen. During operations, all power plant employees shall be trained in its use. The training program shall be submitted to the CPM for review and approval.</p>	Training held on 12/4/19. Completed AED Training.	12/5/2019	

Submitted to CEC
Approved by CEC

ATTACHMENT B

COMPLIANCE-6
PROJECT SCHEDULE
DECEMBER 2019

ATTACHMENT C

**AQ-SC3
AIR QUALITY CONSTRUCTION
COMPLIANCE SUMMARY
DECEMBER 2019**



Air Quality Construction Compliance Summary

Amended Carlsbad Energy Center Project, Phase IV, San Diego County, CA (07-AFC-06C)

PREPARED FOR: Carlsbad Energy Center LLC
PREPARED BY: George Piantka, NRG Energy, Inc.
DATE: January 13, 2020
COMPLIANCE PERIOD: December 2019

This compliance memorandum summarizes the activities conducted in December 2019 to demonstrate compliance with the approved *Air Quality Construction Mitigation Plan (AQCMP) for Phase IV of the Amended Carlsbad Energy Center Project (Amended CECP) (CEC, 2019)*. The Amended CECP Phase IV AQCMP covers the aboveground demolition/removal of Encina Power Station, below grade demolition and site remediation, which will be accomplished under the authority of San Diego County Environmental Health Department (site remediation) and the City of Carlsbad (redevelopment of the site for future use) subsequent to the completion of Phase IV.

Mobilization for Phase IV of the project started during the first week of November 2019.

Phase II concluded with the Commercial Online Date of the Carlsbad Energy Center Project on December 12, 2018. Phase III covered the period of December 12, 2018 with the retirement of Encina Power Station on December 11, 2018, through October 2019, which encompassed the decommissioning of Encina Power Station.

Fugitive Dust Compliance Measures

For this compliance period during Phase IV of the Encina Power Station Demolition the following compliance measures will be implemented and monitored onsite using a compliance checklist:

- Observance of a visible dust plume
- Additional control measures implemented to reduce a visible dust plume
- Complaints filed with the San Diego Air Pollution Control District
- Deviations from the AQCMP

The demolition contractor(s) have only begun personnel mobilization and limited equipment delivery. No active demolition or activities that could create fugitive dust were conducted in December 2019. No deviations from conditions AQ-SC3 or AQ-SC4 occurred during the compliance period. No complaints were filed with the San Diego Air Pollution Control District.

Fugitive dust control measures prescribed in the AQCMP will be monitored via checklists, which will be included in Attachment A of this report.



Diesel Equipment Compliance Measures

All diesel-fueled engines subject to the AQCMP and used during this compliance period that met the diesel equipment compliance measures were tagged by the Air Quality Construction Mitigation Manager and/or the delegate to indicate the equipment are approved for use onsite. The equipment tagged during this compliance period are included in Table 1.

The following compliance measures were implemented during this compliance period:

- Equipment with diesel engines with a rating of 50 horsepower (hp) or higher shall meet Tier 4/4i emissions standards. No exemptions were requested for this compliance period.
- Equipment is maintained in accordance with manufactures recommendations.
- Equipment idling limited to 5 minutes or less to the extent practical.
- Equipment is labeled in accordance with Air Resources Board requirements.
- Equipment will employ electric motors where feasible.

Equipment onsite and used during this compliance period are being recorded and are listed in Table 2. Documentation confirming that equipment used for ten (10) days or more are Tier 4 or Tier 4i, along with the appropriate letter from the equipment owner confirming maintenance is performed as required for the equipment listed in Table 2, are included as Attachment B to this memorandum.

References

California Energy Commission (CEC), 2019. *Air Quality Construction Mitigation Plan, Phase IV, Amended Carlsbad Energy Center Project, (07-AFC-06C)*, Submitted on October 16, 2019; Awaiting CEC approval of Amendment.



Table 1
Diesel Equipment
 AQCMP 07-AFC-06C

<u>Date Arrived (Removal Date)</u>	<u>CARB ID</u>	<u>S/N</u>	<u>Equipment</u>	<u>Engine Data</u>	<u>Diesel hp</u>	<u>Tier</u>	<u>Equipment Owner (Renter)</u>
11/05/2019	PS5H77	0160098681	JLG 55' Shooting Boom Forklift	Cummins, KCEXLO3.8AAA, QSF3.8, 3.8L, SN: 22375101	130	4	Sunbelt
11/11/2019	FP4A83	41935	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG200	92	4I	BISCO
11/11/2019	GC4A66	41936	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG2732	92	4I	BISCO
11/11/2019	YG9P77	41937	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG4188	92	4I	BISCO
01/06/2020	JG4N54	41950	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9059989LELO2	92	4	BISCO
01/06/2020	JN8S95	41951	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9060110LELO2	92	4	BISCO
01/06/2020	XY9V35	41952	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9060108LELO2	92	4	BISCO



Cabrillo Power I LLC
4600 Carlsbad Boulevard
Carlsbad, CA 92008

Attachment A

Air Quality Control Checklists

To be provided starting with the January 2020 MCR



Cabrillo Power I LLC
4600 Carlsbad Boulevard
Carlsbad, CA 92008

Attachment B

Diesel Engine Tier and Maintenance Documentation

January 6, 2020

Project Code: MA0842

NRG-Encina Power Station
4600 Carlsbad Blvd.
Carlsbad, Ca. 92008

Attn: Tim Sisk
Environmental Manager

Subject: Maintenance and Inspection of Equipment

Dear Mr. Sisk:

This letter confirms that Brandenburg Industrial Services Company performs daily inspection reports when equipment is utilized and performs required maintenance for all on-site equipment. Attached is a current Equipment Log for equipment currently on site.

Please let me know if any further information is required.

Best regards,

Anthony Carlson

Anthony Carlson
Brandenburg Industrial Services Co.
Project Manager

DIVISION OFFICE

2217 Spillman Drive
Bethlehem, PA 18015-1982
Phone (610) 691-1800
Fax (610) 691-4200

BRANDENBURG INDUSTRIAL SERVICE COMPANY

501 W. Lake Street, Suite 104 | Elmhurst, IL 60126-1419 | Phone (630) 956-7200 | Fax (630) 956-7222
2625 S. Loomis Street | Chicago, IL 60608-5414 | Phone (312) 326-5800 | Fax (312) 326-5055
1 N. Broadway, Stop 670 | Gary, IN 46402-3101 | Phone (219) 881-0200 | Fax (219) 880-4330
200 E. Big Beaver Road | Troy, MI 48083-1208 | Phone (313) 382-2500 | Fax (800) 849-1589
#50 Rivera Aulet Street, Bo. Pueblo Suite 101 | Arecibo, PR 00612 | Phone (787) 650-7171
800 Town & Country Blvd. | Houston, TX 77024-3916 | Phone (832) 431-3287 | Fax (800) 849-1589

ATTACHMENT D

**BIO-6
PHASE IV BIOLOGICAL RESOURCES
MONTHLY COMPLIANCE REPORT
DECEMBER 2019**

Reporting to begin with January 2020 MCR

ATTACHMENT E

**CUL-5 AND PAL-5
CERTIFICATION OF COMPLETION,
WORKER ENVIRONMENTAL AWARENESS PROGRAM,
DECEMBER 2019**

No WEAP training required in December 2019

ATTACHMENT F

**CUL-6/PAL-6
PALEONTOLOGICAL RESOURCE MONITORING
DECEMBER 2019**

No monitoring required in December 2019

ATTACHMENT G

**COMPLIANCE-6
SUMMARY TABLE OF NOISE HOTLINE CALLS
DECEMBER 2019**

No Noise Hotline calls in December 2019

ATTACHMENT H

**TRANS-5
ROADWAY INSPECTION
DECEMBER 2019**

There was no heavy construction-equipment traffic for demolition of Encina Power Station in December 2019

ATTACHMENT I

**TRANS-6
TRANSPORTATION PERMITS
DECEMBER 2019**

No transportation permits were obtained in December 2019

**ATTACHMENT J
TRANS-8
TRAFFIC ENCROACHMENT PERMITS
DECEMBER 2019**

No traffic encroachment permits were obtained in December 2019

ATTACHMENT K

**SOIL&WATER-2
CONSTRUCTION WATER USAGE SUMMARY**

**SOIL&WATER-9
WASTEWATER SUMMARY**

SOIL&WATER-2
Amended Carlsbad Energy Center Project
07-AFC-06C

Water use Summary December 2019.

Phase II Construction Total Water Use

Potable Water Used: 6,575,440 gallons

Reclaim Water Used: 13,145,265 gallons

Phase I Demolition (Completed August 2016)

Potable Water Used: 612,700 gallons

Reclaim Water Used: 0 gallons

Phase IV Demolition (Started November 2019)

Potable Water Used*: 0 gallons

Reclaim Water Used**: 0 gallons

Cumulative Water Use Phase I, II, III, IV

Potable Water Used: 7,188,140 gallons

Reclaim Water Used: 13,145,265 gallons

*Potable use includes sanitary, hydrotesting, landscape irrigation, and applications not approved for reclaim water use (worker contact applications).

**Reclaim use includes dust control and compaction.

SOIL&WATER-9
Amended Carlsbad Energy Center Project
07-AFC-06C

Wastewater Generation and Disposal Summary
Construction Phase

*ACECP did not generate or dispose of any wastewater offsite during
December 2019.*

ATTACHMENT L

**GEN-2 and TSE-1
MASTER DRAWING LIST UPDATE
DECEMBER 2019**

No master drawing list exists for demolition in December 2019

ATTACHMENT M

**GEN-3
PROOF OF PAYMENT TO DCBO
DECEMBER 2019**

No DCBO invoices were issued for demolition in December 2019

ATTACHMENT N

**CIVIL-1, GEN-6
LIST OF DCBO APPROVALS and
MECH-1
CBO INSPECTION APPROVALS**

DECEMBER 2019

***No DCBO approvals or inspections were conducted for demolition in
December 2019***

**LIST OF DCBO PLAN APPROVALS
AND INSPECTIONS
DECEMBER 2019**

The documents listed below have been approved by the Delegate Chief Building Official (DCBO).

CBO Package No.	Date Submitted	Description	COC

**CBO MECHANICAL INSPECTIONS
DECEMBER 2019**

CBO Package No.	Date Submitted	Description	COC

ATTACHMENT O

**WORKER SAFETY-3
CONSTRUCTION SAFETY SUPERVISOR
MONTHLY SAFETY REPORT
DECEMBER 2019**

MONTHLY SAFETY REPORT

January 8, 2020

To Whom It May Concern

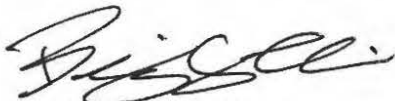
This letter will serve as a summary of safety related activities for the month of December 2019.

During the month of November there have been a total of 23 employees trained for the Encina Power Station demolition project. This brings the jobsite to a total of 35 employees.

The personnel trained for the project consisted of employees from Brandenburg & Marrow Meadows.

There have been no First Aids for the month of December 2019.

Best Regards,



Benjamin Gallina

BISCO Project Safety Manager

BISCO Employee List

Employee Name	Onboard Date
Kevin Smith	11/4/2019
Anthony Carlson	11/4/2019
Benjamin Gallina	11/4/2019
Victor Bautista-Bernal	11/4/2019
Anjanette Ozuna	11/14/2019
Zdenko Krajina	11/18/2019
Zore Bauloski	11/18/2019
Marjanche Bogeski	11/18/2019
Atanas Gegov	11/18/2019
Zoran Pesic	11/18/2019
Daniel Yordanov	11/18/2019
Bryan Steele	11/25/2019
Alan Tanner	12/2/2019
Jesse Cardenas	12/5/2019
Hector Flores Santana	12/5/2019
Luis Marin	12/6/2019
Jessie Munoz	12/6/2019
Goran Arsov	12/9/2019
Baltazar Belman	12/9/2019
Elmer Cuenca Basterio	12/9/2019
Ljupco Micevski	12/9/2019
Juan Ortega Ruiz	12/9/2019
Miguel Pupo Lopez	12/9/2019
Saul Lara Jr.	12/10/2019
Eric Dobbins	12/12/2019
David Garcia	12/13/2019
Jose Chairez	12/13/2019
Graciela Sandoval	12/16/2019
Daniel Encinas	12/16/2019

ATTACHMENT P

**CIVIL-3 AND STRUC-2
NON-CONFORMANCE REPORT LOG**

No non-conformance reports for demolition in December 2019