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Project Title:	Inland Empire Energy Center Project Compliance
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Document Title:	February 2020 Monthly Compliance Report
Description:	N/A
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Submitter Role:	Applicant Representative
Submission Date:	6/11/2020 5:31:51 PM
Docketed Date:	6/12/2020



June 10, 2020

Keith Winstead, CEC Compliance Project Manager California Energy Commission Siting Transmission and Environmental Protection 1516 Ninth Street, MS 15 Sacramento, CA 95814-5512

Subject: Monthly Compliance Reports (MCR) for February 2020

Dear Mr. Winstead:

On behalf of Inland Empire Energy Center, LLC, ATC Group Services (ATC) is pleased to submit the February 2020 Monthly Compliance Report (MCR) for the IEEC Demolition Project. This MCR is being provided to comply with requirements set forth in the Decommissioning and Demolition Plan for the IEEC, dated June 20, 2019 (Docket No. 01-AFC-17C). This MCR consists of the following specific documents, included as attachments to this submittal letter:

Attachment A - Air Quality Construction Mitigation Report; Attachment B - Monthly Biological Monitoring Report.

Thank you and please call me with any questions or clarifications.

Sincerely,

ATC Group Services LLC

Jim Nuccio

Cc: IEEC/GE Power Project Team

Attachment A

Air Quality Construction Mitigation Monthly Report – February 2020

AIR QUALITY CONSTRUCTION MITIGATION REPORT IEEC DEMOLITION PROJECT

MONTHLY REPORT FEBRUARY 2020

Pursuant to Condition AQ-SC3 issued by the California Energy Commission (CEC) for the decommissioning of the Inland Empire Energy Center (IEEC) project, this report details the compliances status of the project for February, 2020 with respect to the various air quality mitigation conditions that govern the project. This report has been prepared by the Air Quality Compliance Mitigation Manager (ACQMM), Mr. Paul Weir, Senior Air Quality Engineer, and evaluates the areas discussed below.

1. Compliance Status of Mobile Off-Road Equipment

A total of thirteen (13) Equipment Tags have been issued for individual diesel fueled mobile off-road equipment to operate at the site. This equipment consists of the following off-road vehicles, as more fully detailed in ATTACHMENT 1:

- 6 Excavators (only 2 of which are currently present at the site)
- 1 Front-End Loader
- 4 Skid-Steer Loaders
- 1 Forklift
- 1 Boom Lift

All mobile off-road equipment present at the IEEC project was found to be in compliance with the California Off-Road Diesel-Fueled Fleets Regulation. All mobile off-road equipment was inspected daily to verify the presence of the Equipment Tags. Fuel records were inspected weekly to determine the fuel consumption of each piece of equipment and to verify that all diesel fuel met the California Air Resources Board (ARB) standards for ultra- low sulfur diesel fuel of 15 PPM sulfur.

2. Compliance Status of Mobile On-Highway Vehicles

Certificates of Reported Compliance, as issued by the California ARB for the following on-road vehicle fleets that operated at the IEEC project, were received and reviewed:

Ecology Auto Parts
 Fleet ID 18190
 Expires December 31, 2020
 G.O. Rodriquez Trucking Inc.
 Fleet ID 36037
 Expires December 31, 2020
 Leon Trucking
 Fleet ID 180893
 Expires December 31, 2020

All vehicles in use at the IEEC project were found to be in compliance with the California ARB Truck and Bus Regulation for on-road vehicles.

3. Compliance with Visible Emission Standards

Observations of all on-site demolition activities were conducted daily by State of California ARB Certified Visible Emission Evaluators (VEE) Paul Weir and/or Andy Pulido. Observations were often conducted for multiple hour intervals for both the demolition of the cooling tower structures and the removal and stockpiling of blue-rock. VEE observations were also conducted during the loading of demolished material into haul trucks for removal from the site.

All demolition activities were found to be in compliance with the following two project conditions:

- 1) No visible emissions of greater than 20% at the specific activity being observed
- 2) No visible emissions crossing the property line

4. Additional Comments on Compliance

- A. All interior traveled surfaces subject to vehicle traffic were kept sufficiently clean or were watered to prevent dust emissions of greater than 20% opacity at any time, and to keep any visible dust emissions from crossing the property line.
- B. Extensive pre-watering occurred for all components of the cooling towers that were scheduled for demolition. In addition, watering of the various structures continued during the actual demolition, with additional water being applied to the demolished materials before and during loading into on-highway trucks for removal from the site.
- C. All areas from which blue rock was being removed were watered before the aggregates were handled by either skid-steer or front-end loader. All surfaces of stockpile materials were watered by either construction hose or water truck to prevent any dust emissions during periods of high winds.

Attachment B

Monthly Biological Survey Report – February 2020



March 6, 2020 Job Number: 1104-015 IEEC Decommissioning - Monthly Monitoring Report

MEMORANDUM FOR THE RECORD

2.6 1104-015.M01

TO: ATC Group Services LLC

(Mr. Jim Nuccio)

General Electric Power (Mr. Frank Escobedo)

Final Report will be transmitted to: California Energy Commission

FROM: Sapphos Environmental, Inc.

(Ms. Paulette Loubet)

SUBJECT: Monthly Monitoring Report – February 2020

FIGURES: 1. Regional Vicinity Map

2. Biological Resources Observations

ATTACHMENTS: 1. Pre-Demolition Biological Survey Forms

2. Environmental training Program Sign-In Sheet

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EXECUTIVE SUMMARY

This Memorandum for the Record (MFR) serves as the Monthly Biological Monitoring Report for the Inland Empire Energy Center (IEEC) Decommissioning and Demolition Project (Project) for the month of February 2020. As directed by the California Energy Commission (CEC) in accordance with the revised Closure Plan, Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP), and the IEEC Closure Plan Staff Analysis and Recommendation prepared for the project, the Monthly Monitoring Report was prepared by the Designated Biologist (DB). Activities included one Pre-Demolition Survey conducted on February 21, 2020, and one weekly site check, conducted on February 24, 2020.

As part of the CEC approval of this project, activities must maintain compliance with mitigation measures identified in BRMIMP. Implementation of these conditions of certification and the updated BRMIMP in the revised Closure Plan would ensure that closure activities comply with applicable LORS and would not result in significant impacts to biological resources.

The Pre-Demolition Survey and weekly site check were performed by the Sapphos Environmental, Inc. DB (Ms. Paulette Loubet). During the Pre-Demolition Survey, the DB verified that no active bird nests were present within the structure scheduled for demolition or within in the surrounding area and clearance for demolition was granted. As part of the preparation for the project kick-off, the Worker Environmental Awareness Program (WEAP) was reviewed and updated to include details related to nesting birds. This information was presented at the first day tailboard on February 24, 2020 to all demolition crew members. After the tailboard, the DB performed a pre-demolition sweep of the cooling tower and a full site check to identify any potential nesting activity.

Anticipated project activities for the next month include the continued demolition and clearing of debris at the cooling tower and various soft demolition activities.

INTRODUCTION

This Memorandum for the Record (MFR) serves as the Monthly Biological Monitoring Report for the Inland Empire Energy Center (IEEC) Decommissioning and Demolition Project (Project) for the month of February 2020. The MFR includes reporting of any marked sensitive biological resource areas established for avoidance, the findings of the Pre-Demolition Surveys, Site Check data forms, Incident & Wildlife Observation Report Forms, and summaries of these records. Activities for the month of February 2020 included one Pre-Demolition Survey conducted on February 21, 2020, and one weekly site check, conducted on February 24, 2020.

The IEEC is an existing natural gas-fired, combined-cycle generating facility located in Riverside County, California. The Project is owned and operated by Inland Empire Energy Center, LLC, which is an indirectly wholly owned subsidiary of General Electric Company (GE).

The Demolition scope to be completed includes removal of above-grade structures associated with Unit 1, Unit 2, and the cooling tower including support systems and appurtenances and removal of subsurface concrete pads, sumps, piping and structure (outside the power block footprint) within 12 feet of grade. At the completion of demolition activities, site grade will be returned to datum elevation. All areas excavated during demolition will be backfilled with existing site material and imported clean engineered fill, if necessary, to maintain the required site grade.

PROJECT LOCATION

The Project is located at 26226 Antelope Road, Menifee, California 92585. The Project site is located approximately 6.0 miles west of the City of Hemet, 4.0 miles east of the City of Perris, and 30.0 miles southeast of the City of Riverside (Figure 1, *Regional Vicinity Map*). The Project is located within the U.S. Geological Survey (USGS) 7.5-minute series Romoland topographic quadrangle. The Project is roughly bound by Antelope Road to the northwest, Ethenac Road to the north, McLaughlin to the south, and an open undeveloped lot to the east.

The Project occupies approximately 35 acres within the 45.8-acre Project site. Approximately 24 fenced acres accommodate the power generation facility, a switchyard, a water treatment facility, storage tank areas, a parking area, a control room building, and two storm water retention basins. The remaining 11 acres of the 35 developed acres are comprised of landscaped areas and access roads. The areas surrounding the Project site are also heavily disturbed and used primarily for industrial purposes. The site contains existing mature landscape trees and shrubs along the property line. The site also contains two water retention basins on the south and southeast. Major project structures and components are depicted in Figure 2, *Biological Resources Observations*.

METHODS

This section describes the methods undertaken by Sapphos Environmental, Inc. biologists to quantify avian species present within the Project area during Pre-Demolition Surveys and weekly site checks.

¹U.S. Geological Survey. [1952] 1967. Los Angeles 7.5-Minute Series Topographic Quadrangle. Reston, VA.

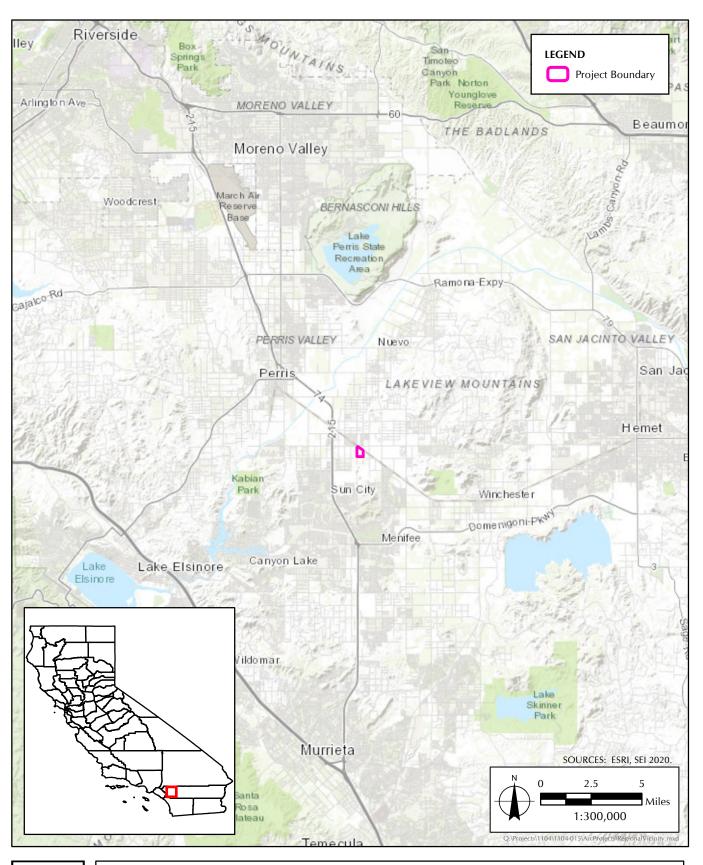
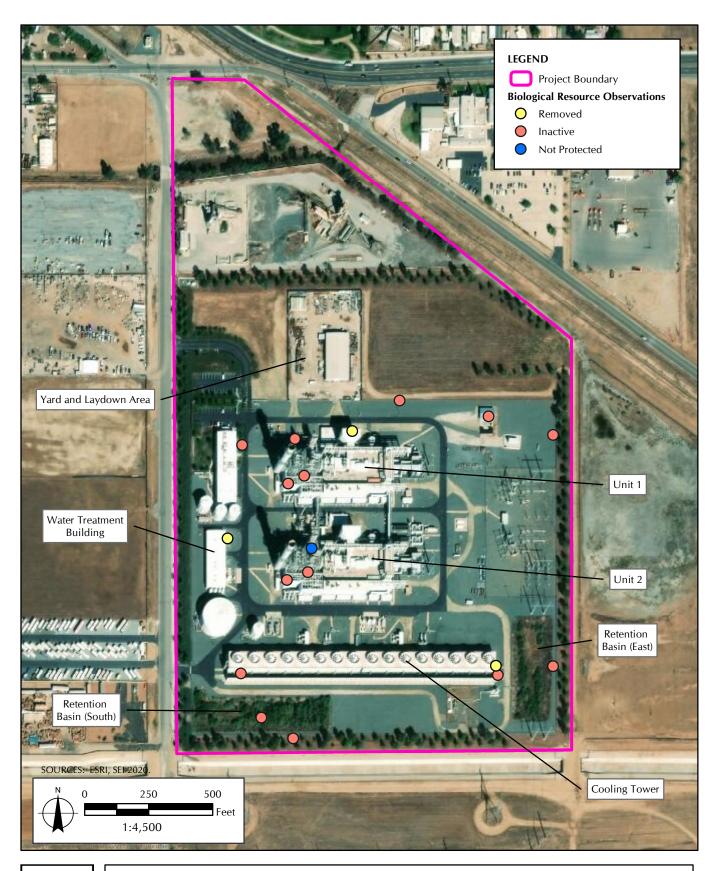




FIGURE 1 Regional Vicinity Map





In compliance with the BRMIMP, a Pre-Demolition Survey has been completed prior to the first phase of demolition activities. Additionally, during nesting bird season, once a work area has been established and cleared, monitoring was reduced to weekly site checks. All observations of nesting birds and sensitive biological resources have been recorded in a database, and a Survey Report Form was generated for each survey and site check (Attachment 1, *Pre-Demolition Biological Survey Forms*).

If active songbird or raptor nests are observed within structures scheduled for removal, or within 300 feet of the demolition area, Project activities will be suspended within a determined buffer of the nesting until the DB determines that Project activities would no longer interfere with nesting activities. If construction activities are outside the buffer and determined to not interfere with nesting activities, construction can continue without a biological monitor present.

Incident & Wildlife Observation Report

This form, produced during the initial construction of the Project and included in the BRMIMP, is to be filled out by any onsite personnel who find active nest sites, burrows, dens, dead or injured wildlife or other biological resources during daily construction activities.

Pre-Demolition Survey Methods

Pre-Demolition Surveys will be completed prior to each phase of demolition activities. Major phased activities include (1) removal of the cooling water tower, (2) removal of Units 1 and 2, (3) removal of balance of plant structures and equipment, (4) site-wide backfill placement, and (5) final grading. Prior to initial disturbance activities within each phase of demolition, the DB will conduct a Pre-Demolition Survey for all locations scheduled to be demolished. The Pre-Demolition nesting bird surveys will be completed no more than three (3) days prior to project demolition activities within in each phase.

Areas scheduled for demolition will be surveyed on foot by walking within and around each structure. Any areas that are inaccessible will be visually scanned with binoculars. The surrounding area (up to a 500-foot buffer) will also be surveyed via binoculars. A Pre-Demolition Survey data form (included in the BRMIMP, Attachment A) has been developed to assist in the performance of surveys and maintenance of a survey database. Additionally, data will be collected via photographs and through GIS data collection application to document locations of sensitive biological resources observed.

Weekly Site Check Methods

Within the nesting bird season, weekly site checks will minimize the potential that Project activities will cause active nest failures as well as minimize or avoid construction delays. During these site checks, the monitor can spot check "high risk" nesting locations that were identified in the Pre-Decommissioning Nest Identification Survey which was undertaken by Insignia Environmental prior to decommissioning activities in August 2019. Each survey will be conducted in a single day, and will include completion of appropriate data forms. Methods of these site checks and associated data collection will be the same as explained above for Pre-Demolition Surveys.

RESULTS

Impact Avoidance Measures

As part of the preparation for the Project kick-off the WEAP was reviewed and updated to include details related to nesting birds. This information was presented at the first day tailboard on February 24, 2020 to all demolition crew members. The Certificate of Completion signed by all who attended the training is included in Attachment 2, *Environmental training Program Sign-In Sheet*.

As no sensitive biological resources were observed, the DB did not implement specific impact avoidance measures or establish any avoidance areas. The DB did not implement any specific flagging or signage of construction areas and roads.

Areas and Activities Monitored

A summary of the Pre-Demolition Survey and Weekly Site Check is included below (Table 1, *Pre-Demo Survey and Weekly Site Checks*). All Pre-Demolition Survey and Weekly Site Check Forms are included in Attachment 1.

Figure 2, *Biological Resources Observations* includes areas surveyed and sensitive biological resources observed. This figure does not include impact avoidance measures as none were implemented for the month of February.

TABLE 1
PRE-DEMO SURVEY AND WEEKLY SITE CHECKS

Date	Time	Staff	Activity in Progress	Crews/ Equipment	Comments	Required Action Items
2/21/2020	0700– 1130	DB (Paulette Loubet)	None. Crews do not work Fridays.	None.	DB Ms. Loubet conducted a Pre-Demolition survey of the cooling tower and the surrounding area. The DB also surveyed areas around project site with high potential for nesting. No active migratory bird nests were observed at the site. Several old/inactive nests were observed, and locations were recorded.	None – clearance granted to start demolition of cooling tower.
2/24/2020	0620– 1000	DB (Paulette Loubet)	Demolition of cooling tower.	Water truck, excavator, bobcat, forklift, work trucks.	DB Ms. Loubet conducted a Pre-demolition sweep of the cooling tower and the surrounding area. After it was determined to be inactive, an unknown cup nest was removed near the water treatment building. No active migratory bird nests were observed at the site.	None – clearance granted to start demolition of cooling tower.

Incident & Wildlife Observation Report

No Incident & Wildlife Observation Report forms were completed by onsite personnel during the month of February.

CONCLUSIONS

At every survey conducted for nesting birds in February, the DB verified that no migratory bird nests were present, and clearance was granted for construction activities to continue.

The following is a summary of scope of work for demolition and monitoring activities planned for the month of March 2020.

- Weekly Site checks will occur March 2, 9, 16, 23, and 30, 2020.
- The DB will continue to coordinate with construction management to schedule upcoming Pre-Demolition Surveys.

Should there be any questions, or should further information be required, please contact Ms. Paulette Loubet at (626) 683-3547, extension 142.



Inland Empire Energy Center Project Pre-Construction Biological Survey Form

Date 2/21/2020	Observer Paulette Loubet Designated Biologist (DB)	Start Time: 0700 End Time: 1130	Page 1 of 8
Visibility (circle one): <u>Good Fair Poor</u>			
Precipitation (circle on	e): <u>none</u> light rain rain other		

Description of Area Surveyed (attach map or include GPS coordinates):

- 0700 DB attended tailboard with ATC (Andy Pulido) before starting survey.
- 0720-0900 DB (accompanied by Mr. Pulido) surveyed the north and south sides of the cooling tower, within the unit, the roof and the surrounding area including the two water retention basins and the south side of the switchyard.
- A SWPP silt fence has been installed around the entire project site (photo below)
- The DB observed and inactive stick nest (most likely raven) within the southwest side of the cooling unit (Photos below).
- A dead pigeon was observed within the drained basin under the cooling units. The carcass was decayed and case of death unknown but not likely related to decommissioning activities.
- A white bird box is present on the south side of the southern retention basin and one on the east side of the eastern basin. European starlings (not protected) were observed preaching on and entering the bird boxes (Photos below).
- No active nests were observed within the cooling tower or within the surrounding area.
- 0900- 1050 The DB continued site survey of locations previously identified in Pre-Decommissioning Nest Identification Survey conducted by Insignia. This included Unit 1 and 2, the courtyard, switchyard and associated equipment within fenced in area, storage area in northeast corner of site and roads.
- All trees immediately surrounding the site were scanned with binoculars for nesting activity.
- In Unit 1, where the great horned owls have been previously observed, scat, pellets and nesting material were observed but no active nests or live owls.
- One new initiative nest was observed in front of the water treatment building where it looks like a piece of equipment was removed, exposing the nest (photo below).
- A stick nest (likely raven) was on the top platform of the tower of Unit 2 (photo below).
- Silverado or GE crews should remove all confirmed inactive nests to discourage nests or nesting material being reused by birds on site.
- 1100-1130 DB surveyed area outside of site fence on the most southern side between the retention basin and the concrete channel.
- 1130 DB left site. No active nests were observed.

Habitat Description:

Developed areas within the IEEC and two retention basins containing vegetation such as mulefat, willow tamarisk, tree tobacco and other non native weedy species.

Species Observed (attach additional sheet if necessary):

Animals	
American Kestrel	lesser goldfinch
Anna's hummingbird	meadowlark
bushtit	mourning dove
Cassin's Kingbird	northern rough winged swallow
common raven	red tailed hawk

Cooper's hawk	rock pigeon
European starling	Says phoebe
great horned owl	song sparrow
house finch	white crowned sparrow
house sparrow	yellow rumped warbler

Site Information

Overall habitat quality (circle one) Excellent Good Fair Poor Site is entirely developed besides basins

Current land use: Inland Empire Energy Center

Surrounding land use: Open fields, urban/residential development and commercial/industrial

Visible disturbance: urban development, demolition activities, roads and

Threats: Demolition activities

Comments: None

Photographs:





Southern fence

Example of SWPP fence that surrounds the project area



Eastern retention basin

Detention bason on east end of cooling tower, facing south east.



Cooling tower

Inside of cooling tower, facing west



Cooling tower

Photo from north side of cooling tower roof, facing east.









Inland Empire Energy Center Project Pre-Construction Biological Survey Form

Date 2/24/2020	Observer Paulette Loubet	Start Time: 0620	Page 1 of 2	
	Designated Biologist (DB)	End Time: 1000		
Visibility (circle one): Good Fair Poor AM visibility poor due to fog, cleared up around 0800				
Precipitation (circle on	e): none light rain rain other	AM heavy fog/mist		

Description of Area Surveyed (attach map or include GPS coordinates):

06:30 DB attended tail board with Silverado, GE and ATC crew in laydown area. DB presented WEAP training to crews, sign in attached below.

Crews will be completing SWPP and BMP installation around the cooling towers for the start of demo. Demo of cooling tower will be "Mass Wreck" must stay out of flagged off areas. Other areas still doing "Soft Demo" removing instillation and materials in courtyard (between Unit 1 and 2).

0700 Water truck and other equipment mobilized to the demo area.

0700-0805 DB started weekly site check by doing a sweep of the cooling tower before demo started. DB informed construction manager (Jimmy) about inactive raven nest in the rafters on the SW side of the unit. Due to safety concerts the crew was not able to take photo of inside of nest or drop nest to the ground prior to demolition. Nest will be removed by excavator when this portion of the cooling tower is demolished.

08:15 DP checked on inactive nest near the water treatment building. The DB confirmed the nest was still inactive and removed. Nesting material was scattered along the fence to discourage reuse by other birds. 08:20-10:00 DP continued site check of; Unit 1 and 2, courtyard, switchyard and associated equipment within fence area, most northeast corner of site, and the Silverado yard/laydown area. No active nests were observed.

Habitat Description:

Developed areas within the IEEC and two retention basins containing vegetation such as mulefat, willow tamarisk, tree tobacco and other non-native weedy species.

Species Observed (attach additional sheet if necessary):

Animals	**************************************
American Kestrel	house finch
Anna's hummingbird	house sparrow
bushtit	mourning dove
Cassin's Kingbird	rock pigeon
common raven	Says phoebe
great horned owl	song sparrow
European starling	yellow rumped warbler

Site Information

Overall habitat quality (circle one) Excellent Good Fair Poor Site is entirely developed besides basins
Current land use: Inland Empire Energy Center
Surrounding land use: Open fields, urban/residential development and commercial/industrial
Visible disturbance: urban development, demolition activities, roads and
Threats: Demolition activities
Comments: None





North side

Cooling Tower before demoltion, facing southwest.



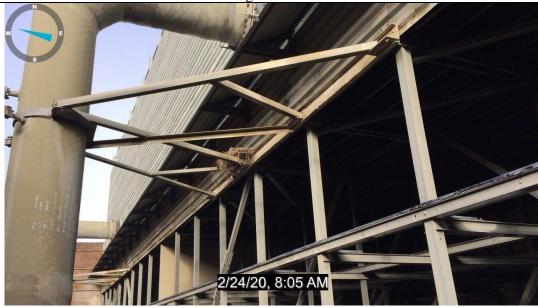
East side of water treatment building

Inactive nest before removal



Behind water treatment building

Inactive nest after removal scattered along fence line.



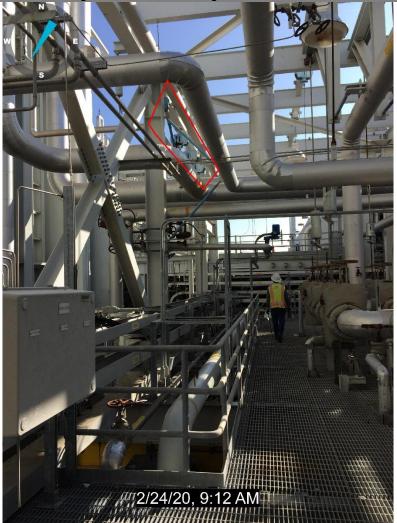
Southwest corner of cooling tower

Inactive nest (most likely raven) within demolition area.



North side of cooling tower.

Crews starting demolition of cooling tower



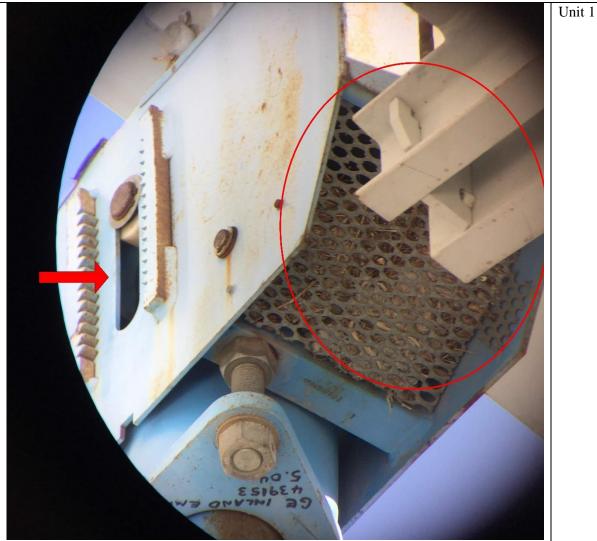
Within Unit 1

Equipment with inative nests (circled in red). Photo from second floor of Unit 1.



Within Unit 2

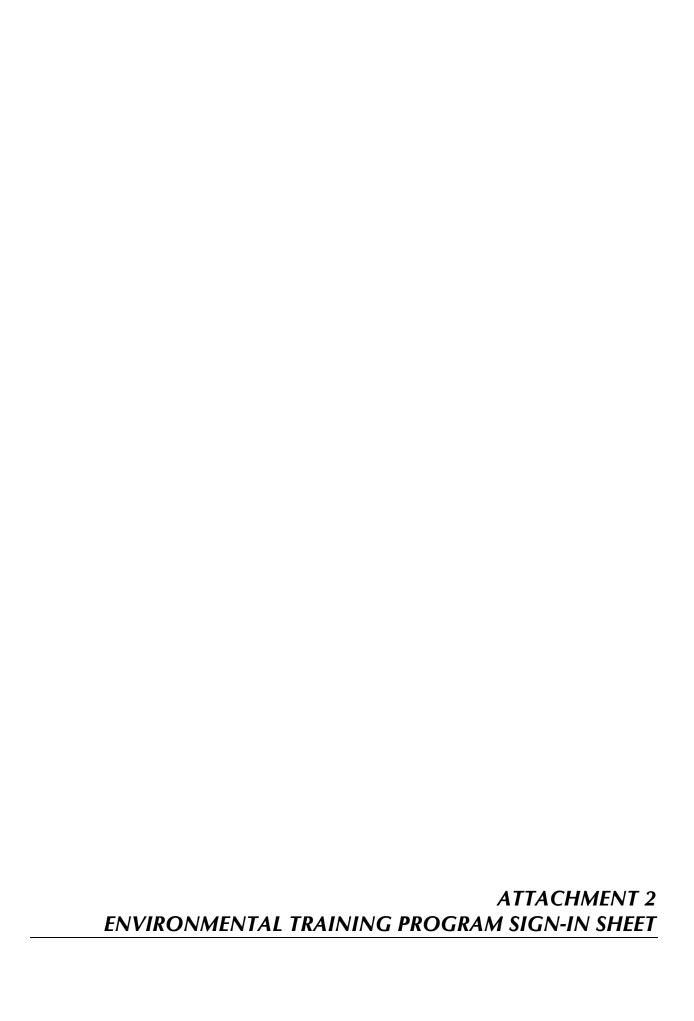
Equipment with inative nests (circled in red). Two of four shown.. Photo from second floor of Unit 2.



Close up of equimpent with inative nests within Unit 1 and 2. Arrow shows were birds enter/exit and old nesting material visibile witin circled area.



Yard/layd own area on north side of site



Inland Empire Energy Center, LLC (IEEC) Environmental Training Program Sign-in Sheet

Date: 2/24/2016

Instructor(s)__

Paulette Laubet

- I have attended the IEEC Environmental Training Program and understand the information I have been given.
- I understand that failure to abide by the procedures outlined in the Environmental Training Program may be cause for immediate dismissal from the project.
- I understand that it is illegal to disturb or destroy special-status plant and animal species or cultural resources, and that I will be held personally liable for any violations of the endangered species and cultural resource laws.
- I understand that I am required to display the Environmental Training Program hard hat decal at all times while I am on the construction site.

PLEASE NOTE:

By signing below, I acknowledge that I have attended the Worker Environmental Awareness Training Program for IEEC and I agree to comply with all the environmental requirements presented.

Name (print)	Name _∧ (signature)	Company	EMP ID#	Badge #	Parking Permit #
BRIN LAURIN	OSTA	SILVEMADO			
Michael Hernandez	MIMI	Silvorada			
Jumy SALDWAR	6 X	SILVORADO			
TOSA MINAMESTS	Pant	SILVENTO			
Jorge Garaza	R.D	Silverado Gilienaso			
MAPO MUCUSA	1	Sitienasa			
PAULAVIA	Tardund	ATC-C			
Lergie Peliot.	Otherida	ATCGS			
BIHGLEASON S	to Au	ATCGS			
DougSimms	Wong Sugar	ATCGS TRB			
Jorge Valoucry	They	SCI			
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