

DOCKETED

| | |
|-------------------------|--|
| Docket Number: | 01-AFC-17C |
| Project Title: | Inland Empire Energy Center Project Compliance |
| TN #: | 233453 |
| Document Title: | April 2020 Monthly Compliance Report |
| Description: | N/A |
| Filer: | Paul Kihm |
| Organization: | Latham & Watkins LLP |
| Submitter Role: | Applicant Representative |
| Submission Date: | 6/11/2020 5:40:06 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 April 2020

Dear Mr. Winstead:

On behalf of Inland Empire Energy Center, LLC, ATC Group Services (ATC) is pleased to submit the April 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 – April 2020

AIR QUALITY CONSTRUCTION MITIGATION REPORT

IEEC DEMOLITION PROJECT

MONTHLY REPORT APRIL 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 April, 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.

1a. Compliance Status of Mobile Off-Road Equipment

A total of eighteen (18) Equipment Tags have been issued for individual diesel fueled mobile off-road vehicles to operate at the site. Most of these vehicles had already left the site by the end of April.

This equipment consists of the following off-road vehicles, as more fully detailed in ATTACHMENT 1:

- 7 Excavators (only 4 of which were present at the site at the end of April)
- 1 Front-End Loader (not present at the site anytime during April)
- 5 Skid-Steer Loaders (only 2 of which were still present at the site at the end of April)
- 1 Forklift
- 1 Aerial Lift (not present at the site anytime during April)
- 3 Boom Lifts (only 1 of which was still present at the site at the end of April)

1b. Compliance Status of Portable Equipment

A total of (4) Equipment Tags have been issued for pieces of diesel fueled portable equipment; however only 2 pieces were present at the site at the end of April, also as more fully in ATTACHMENT 1:

- 1 Generator Set (75 KW)
- 3 Air Compressors (185 CFM) (only 1 air compressor was still present at the end of April)

All mobile off-road equipment, as well as all portable equipment, present at the IEEC project was found to be in compliance with the various California Diesel-Fueled Fleet Regulations. All mobile off-road equipment and portable equipment present at the site 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.

Examples of typical fuel invoices from the two fuel vendors (Alexis Oil and Flyer Energy) are found in ATTACHMENT 2. Copies of all fuel invoices are kept available for review in the ATC office located at the site.

2. Compliance Status of Mobile On-Highway Vehicles

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

| | | |
|------------------------------|-----------------|---------------------------|
| • MA Perez Trucking | Fleet ID 34669 | Expires December 31, 2020 |
| • Dal Chem dba Alexis Oil | Fleet ID 52997 | Expires December 31, 2020 |
| • J Garcia Trucking | Fleet ID 90601 | Expires December 31, 2020 |
| • DGJ Trucking | Fleet ID 90616 | Expires December 31, 2020 |
| • Silverado Contractors Inc. | Fleet ID 161385 | Expires December 31, 2020 |
| • Industry Transport | Fleet ID 161841 | Expires December 31, 2020 |

All of the on-road vehicle fleets currently being utilized 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 demolition activities and 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

All observed loading of demolished material into haul trucks for removal from the site was accomplished with no visible emissions.

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. Pre-watering occurred for all components that were scheduled for demolition. In addition, watering of the various structures continued during actual demolition, with additional water being applied, as needed, to the demolished materials before and during loading into on-highway trucks for removal from the site.

ATTACHMENT 1

APRIL 2020

STATUS OF DIESEL FUELED EQUIPMENT AUTHORIZED AT SITE

| EQUIPMENT TAG | MAKE & MODEL | ON-SITE? | |
|---------------------------|---------------------|-------------------|-----------------|
| | | AT START OF MONTH | AT END OF MONTH |
| EXCAVATORS | | | |
| ME-1-01-A | 75X3 LINKBELT | NO | YES |
| ME-1-02-D | 1200 HITACHI | YES | YES |
| ME-1-03-A | 490 LINKBELT | NO | NO |
| ME-1-04-A | 350X4 LINKBELT | YES | YES |
| ME-1-05-A | 870 HITACHI | YES | YES |
| ME-1-06-A | 350 LINKBELT | NO | NO |
| ME-1-07-A | 750 LINKBELT | NO | NO |
| FRONT-END LOADERS | | | |
| ME-4-01-A | JOHN DEERE 544L | NO | NO |
| SKID-STEER LOADERS | | | |
| ME-5-01-E | T590 BOBCAT | YES | NO |
| ME-5-02-E | T550 BOBCAT | NO | NO |
| ME-5-03-E | S750 BOBCAT | NO | NO |
| ME-5-04-E | S740 BOBCAT | YES | YES |
| ME-5-05-E | S750 BOBCAT | YES | YES |
| FORKLIFTS | | | |
| ME-7-01-E | 12 K GRADEALL | YES | YES |
| BOOM LIFTS | | | |
| ME-8-01-E | JLG 600S | YES | YES |
| ME-8-02-E | SKYJACK | NO | NO |
| ME-8-03-E | GENIE | NO | NO |
| AERIAL LIFTS | | | |
| ME-9-01-E | JLG 600 AJ | YES | NO |
| GENERATOR SETS | | | |
| PE-1-01-A | 75 KW GEN-SET | YES | YES |
| AIR COMPRESSORS | | | |
| PE-2-01-F | 185 CFM SULLAIR | YES | YES |
| PE-2-02-F | 185 CFM SULLAIR | NO | NO |
| PE-2-03-F | 185 CFM ATLAS COPCO | NO | NO |

ATTACHMENT 2

APRIL 2020

ULTRA LOW SULFUR DIESEL FUEL

EXAMPLE INVOICES

| | SUPPLIER | DATE | INVOICE NUMBER | AMOUNT |
|-----|-----------------|-------------|-----------------------|---------------|
| 2-1 | ALEXIS OIL | 4/02/20 | 307663 | 105 GALLON |
| 2-2 | FLYERS | 4/30/20 | CFS-2264131 | 75 GALLON |

ATTACHMENT 2-1

APRIL 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

ALEXIS OIL COMPANY

4/02/20

307663

105 GALLON



219 Glider Circle
Corona, CA 92880-2534
(951) 279-9830



INVOICE NUMBER 307663

ACCOUNT NUMBER 12543 DATE: 04-02-20

SOLD TO: SILVERADO CONTRACTORS, INC.
2855 MANDELA PKWY
2ND FLOOR
OAKLAND, CA 94608

SHIP TO: SILVERADO CONTRACTORS, INC.
26226 ANTELOPE RD
2ND FLOOR
SUN CITY, CA 92585

| | | | | | | | |
|-----------------------|--------------|---------------|---------------|--------|----------------------------|----------|--|
| PURCHASE ORDER NUMBER | | SALESMAN | | TERMS | | DUE DATE | |
| 20-005-06 | | DANIEL J. LEA | | NET 15 | | 04-17-20 | |
| DRIVER | TRUCK NUMBER | ORDER DATE | DELIVERY DATE | | HAZARDOUS MATERIALS NUMBER | | |
| 22 | 20 | 04-01-20 | 04-02-20 | | 1-800-424-9300 | | |

| NO. OF PKG S | BULK OR PKG SIZE | PRODUCT DELIVERED | ORDERED | DELIVERED | PRICE | AMOUNT |
|--------------|------------------|--|---------|-----------|-------|--------|
| | BULK | NA1993, DIESEL FUEL, 3, PG III DIESEL FUEL EVIDENCE OF DYE DIESEL FUEL#2 CARB DYED FEDERAL LUST TAX AB32-GAS FEDERAL OIL SPILL LIAB. TAX ULTRA LOW-SULFER DIESEL FUEL-DYD 15-PPM SULFER MAXIMUM | 105 | 105 | 105 | |
| 1 | EACH | SERVICE CHARGE | 1 | 1 | | |
| 1 | EACH | TRANSPORTATION CHARGE | 1 | 1 | | |
| 1 | EACH | REGULATORY COMPLIANCE FEE | 1 | 1 | | |

| | | | | | | |
|--|--------------|--------------------|--|-----------------------------|----------------|------------------------------|
| FOR CHEMICAL EMERGENCIES, SPILL, LEAK, FIRE EXPOSURE, OR ACCIDENT CALL CENTREC 1-800-424-9300 | | | | | | |
| PAST DUE AFTER 04-17-20 if account unpaid within time permitted, customer agrees to pay interest at 18% PER ANNUM and attorney's fees if account is referred to an attorney for collection. The undersigned hereby states that he is authorized to bind the principal to the terms hereof. | | | | | SUB TOTAL | |
| | | | | | SALES TAX 7.50 | |
| DRUMS DELIVERED | | DRUMS RETURNED | | DRUMS NET | | |
| CHECK NUMBER | CHECK AMOUNT | CREDIT CARD AMOUNT | | TOTAL → | | |
| ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION | | | | RECEIVED IN GOOD ORDER X | | PLEASE PAY FROM THIS INVOICE |

THIS IS TO CERTIFY THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION. ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION



219 Glider Circle
 Corona, CA 92880-2534
 (951) 279-9830

A Division of Dalchem
 www.alexisoil.com

SOLD TO: SILVERADO CONTRACTORS, INC.

2855 MANDELA PKWY
 2ND FLOOR
 OAKLAND, CA 94608



DELIVERY TICKET NUMBER 307663
 ACCOUNT NUMBER: 12543 DATE 04-01-20

SHIP TO: SILVERADO CONTRACTORS, INC.

26226 ANTELOPE RD
 2ND FLOOR
 SUN CITY, CA 92585

| PURCHASE ORDER NUMBER | | SALESMAN | | TERMS | | DUE DATE | | | |
|---|-------------------|---|--|------------|---------|------------------------|-------|------------------------------|--|
| 20-005-06 | | DANIEL J. LEA | | NET 15 | | 04-17-20 | | | |
| DRIVER | | TRUCK NUMBER | | ORDER DATE | | DELIVERY DATE | | HAZARDOUS MATERIALS NUMBER | |
| | | | | 04-01-20 | | 04-02-20 | | 1-800-424-9300 | |
| NO. OF PKG'S | BULK OR PKG. SIZE | PRODUCT DELIVERED | | | ORDERED | DELIVERED | PRICE | AMOUNT | |
| | BULK | NA1993, DIESEL FUEL, 3, PG III DIESEL FUEL EVIDENCE OF DYE DIESEL FUEL#2 CARB DYED FEDERAL LUST TAX AB32-GAS FEDERAL OIL SPILL LIAB. TAX ULTRA LOW-SULFUR DIESEL FUEL-DYD 15-PPM SULFUR MAXIMUM DELIVER 4/2/20 *AUTO* | | | 400 | 105 | | 2.20 125.80 | |
| 690-53 Bobcat-11 Bobcat-8 Generator-33 | | | | | | | | | |
|  | | | | | | | | | |
| FOR CHEMICAL EMERGENCIES, SPILL, LEAK, FIRE EXPOSURE, OR ACCIDENT CALL CENTREC 1-800-424-9300 | | | | | | | | | |
| PAST DUE AFTER PER ANNUM and attorney's fees if account is referred to an attorney for collection. The undersigned hereby states that he is authorized to bind the principal to the terms hereof. | | | | | | SUB TOTAL 7.750 | | | |
| | | | | | | SALES TAX | | | |
| DRUMS DELIVERED | | DRUMS RETURNED | | DRUMS NET | | | | | |
| CHECK NUMBER | CHECK AMOUNT | CREDIT CARD AMOUNT | | TOTAL = | | | | | |
| ERRORS IN PRICE, EXTENSION AND ADDITION SUBJECT TO CORRECTION | | | | | | RECEIVED IN GOOD ORDER | | PLEASE PAY FROM THIS INVOICE | |

THIS IS TO CERTIFY THAT THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

ATTACHMENT 2-2

APRIL 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

FLYERS ENERGY LLC

4/30/20

CFS-2264131

75 GALLON



RECEIVED MAY 08 2020

Fuel Card Invoice

2360 Lindbergh Street • Auburn, CA 95602
(800) 899-2376 (800) 899-2376

| | | |
|----------------|----------------|----------------|
| CLOSING DATE | INVOICE DATE | DUE DATE |
| 04/30/2020 | 04/30/2020 | 5/17/2020 |
| ACCOUNT NUMBER | INVOICE NUMBER | INVOICE AMOUNT |
| 14807 | CFS-2264131 | |

Due by Sun 05/17/2020 (Net 15 Days)

345.533229.D11 1 of 5

Silverado Contractors, Inc.
2855 Mandela Parkway 2nd Floor
Oakland, CA 94608

Flyers Energy, LLC
Dept #34516
P.O. Box 39000
San Francisco, CA 94139-0001

051720 00014807 0002237580 8



DEF now available 655 S. Stanford Way Sparks, NV

Please detach at perforation and include this portion with your remittance in the envelope provided.

| Date/Time | Card | Site | Product | Veh | Manual | Odometer | MPG | Units | Unit Price | Amount |
|-----------|------|------|---------|-----|--------|----------|-----|-------|------------|--------|
|-----------|------|------|---------|-----|--------|----------|-----|-------|------------|--------|

Card Processing Invoice

Silverado Contractors, Inc.

Account: 14807

Original Page: 5

Invoice Date: 04/30/2020

Invoice No: CFS-2264131

| Date/Time | Card | Site | Product | Veh | Manual | Odometer | MPG | Units | Unit Price | Amount |
|-----------|------|------|---------|-----|--------|----------|-----|-------|------------|--------|
|-----------|------|------|---------|-----|--------|----------|-----|-------|------------|--------|

4786104 - SID AVERILL

| | | | | | | | | | | | |
|------------------------------------|-------|---------|---------------------------|-----------|------|-----|--------|--------|---------------|---------|---------------|
| 04/24/20 | 8:02a | 4786104 | Kettleman City, CA - 1739 | Regular | 0000 | EQ | 10,005 | 999.99 | 27.57 | 2.32834 | 64.19 |
| 04/27/20 | 3:27p | 4786104 | So. San Fran, CA - 101 | Regular | 0000 | 0 | 10,005 | 0.00 | 23.26 | 2.42573 | 56.42 |
| 04/29/20 | 5:43a | 4786104 | Perris, CA - 95 | Diesel #2 | 0000 | Sub | 20,005 | 133.34 | 75.00 | 2.65540 | 199.15 |
| 4786104 - SID AVERILL Total | | | | | | | | | 125.83 | | 319.76 |

Card Processing Invoice

Silverado Contractors, Inc.

Account: 14807

Original Page: 9

Invoice Date: 04/30/2020

Invoice No: CFS-2264131

| | | |
|----------------------|--------------|---------------|
| Invoice Total | Units | Amount |
| | 8,614.71 | |

| |
|--------------------------------------|
| ****Payment Terms Summary**** |
| Due by Sun 05/17/2020 (Net 15 Days) |

Attachment B

Monthly Biological Survey Report – April
2020

May 7, 2020
Job Number: 1104-015
IEEC Decommissioning - Monthly Monitoring Report

MEMORANDUM FOR THE RECORD

2.6 1104-015.M03

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 – April 2020

FIGURES: 1. Regional Vicinity Map
2. Biological Resources Observations

ATTACHMENTS: 1. Pre-Demolition Biological Survey Forms
2. Environmental Training Program Sign-In Sheet

Corporate Office:
430 North Halstead Street
Pasadena, CA 91107
TEL 626.683.3547
FAX 626.628.1745

Billing Address:
P.O. Box 655
Sierra Madre, CA 91025
Web site:
www.sapphosenvironmental.com

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 April 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 weekly site checks conducted on April 8, 13, 20 and 27, 2020. Full-time construction monitoring was also conducted on April 20, 2020.

As part of the CEC approval of this project, activities must maintain compliance with mitigation measures identified in the 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 weekly site checks and monitoring were performed by the Sapphos Environmental, Inc. DB (Ms. Paulette Loubet). During the weekly site checks, the DB verified that no active bird nests were present within any equipment or structures scheduled for demolition or within in the surrounding area. As part of the Project kick-off, a Worker Environmental Awareness Program (WEAP) was presented to all crew members at the first day tailboard on February 24, 2020.

On March 2, 2020, two (2) active owl nests (one great horned owl nest and one barn owl nest) were observed onsite and specific Environmentally Sensitive Area (ESA) buffers were put into place. On April 27, 2020, the great horned owl nest was determined to be inactive and the ESA buffer was removed. The ESA buffer remains in place for the active barn owl nest, which contains at least four chicks and is located in a nest box on the remaining east-facing wall of the cooling tower.

A new active American kestrel nest was observed on April 27, 2020. This nest is located on the top catwalk of the stack of Unit 1 and contains at least one egg. Due to the vertical height and direction of the nest cavity opening, the DB determined the appropriate nest buffer would only include the stack itself and no ESA signs were placed.

When Project activities were scheduled to occur near the nest buffers the DB provided full-time monitoring to observe and document the nesting birds' behavioral reaction to equipment and activities during active construction.

Anticipated Project activities for May include continued removal of turbine equipment from Unit 1 and 2, the start of demolition of other structures on the outside of Unit 2, clearing of debris from the cooling tower and courtyard area, as well as various soft demolition activities around the site.

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 April 2020. The MFR includes reporting of any marked sensitive biological resource areas established for avoidance, the findings of any Pre-Demolition Surveys, Site Check data forms, Incident & Wildlife Observation Report Forms, and summaries of these records. Activities for the month of April 2020 included four (4) weekly site checks, and full-time monitoring conducted on April 20, 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.¹ 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 (2) 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 (2) 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 weekly site checks and actions taken during full-time monitoring. No Pre-Demolition Surveys were conducted in the month of April.

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

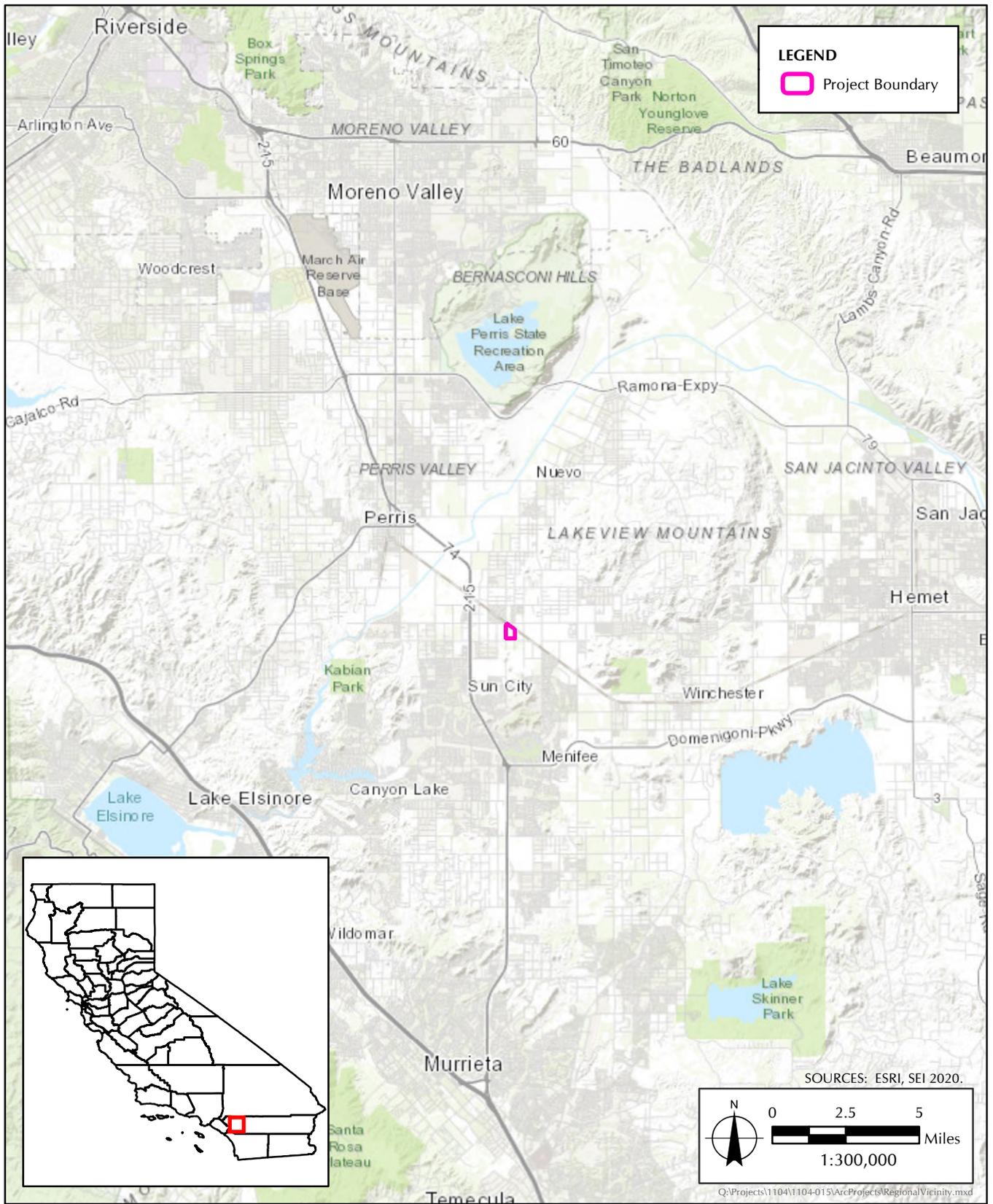


FIGURE 1
 Regional Vicinity Map

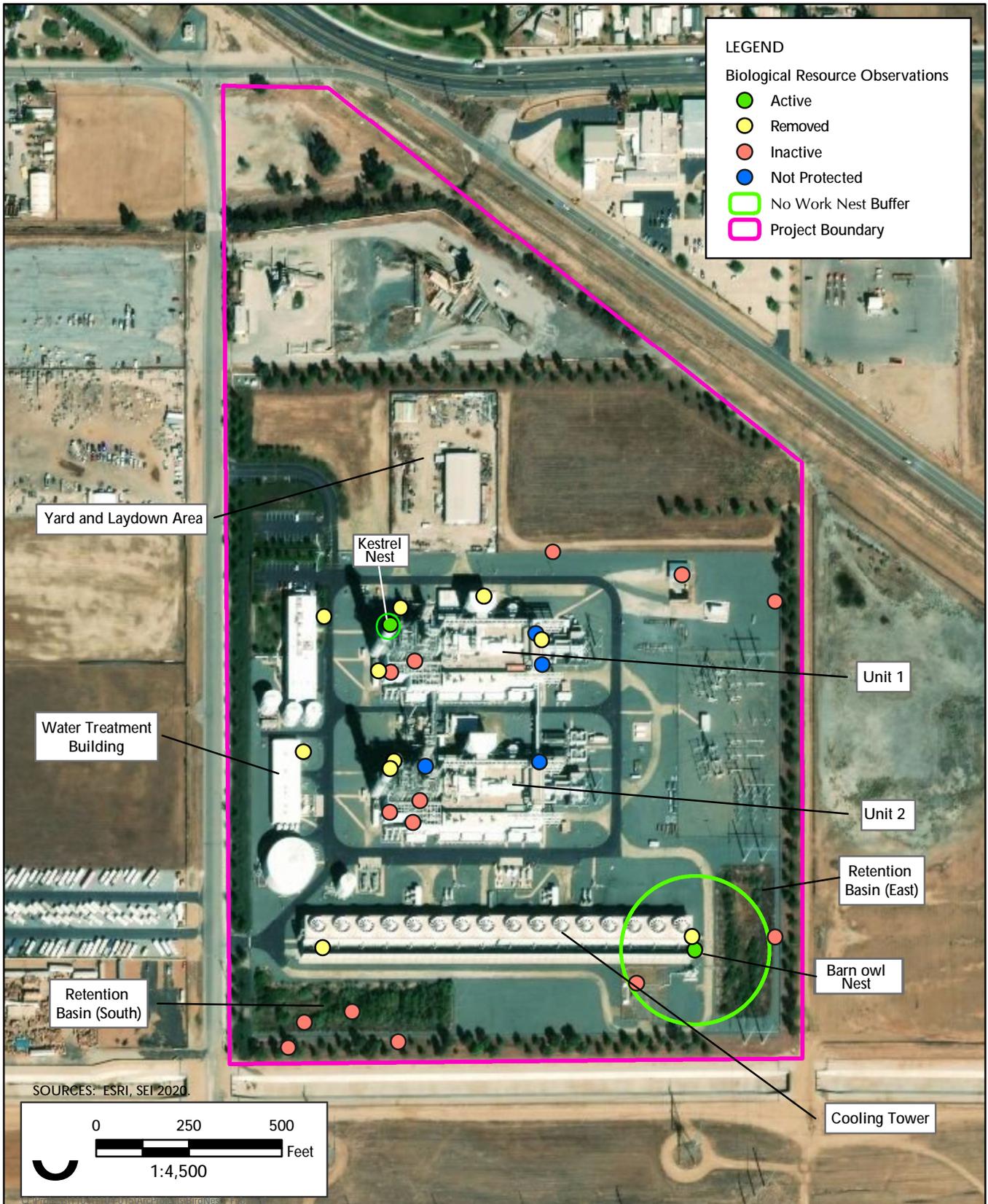


FIGURE 2
Biological Resources Observations

In compliance with the BRMIMP, once the Pre-Demolition Survey was completed and a work area was established, monitoring was reduced to weekly site checks during nesting bird season.

Weekly site checks consist of a pedestrian search by the DB for both direct and indirect evidence of bird nesting. Direct evidence includes the visual identification of an actual nest location. Indirect evidence includes observing birds for nesting behavior, such as copulation, carrying food or nesting materials, nest building, adult agitation or feigning injury, feeding chicks, removal of fecal sacks, and other characteristic behaviors that indicate the presence of an active nest. Each site check was conducted in a single day and included completion of appropriate data forms.

If active songbird or raptor nests were observed within structures scheduled for removal, or within 300 feet of the demolition area, Project activities were suspended within a determined buffer of the nesting until the DB could arrive to monitor. After baseline observations were made by the DB, a species-specific nest buffer was established based on details such as nest location, stage of nesting (i.e., incubation, feeding chicks) and surrounding activities.

During full-time monitoring, the DB implemented and maintained the established ESA buffer, monitored adjacent construction activities, and documented observations of the nesting birds' behavior and reaction to construction. During monitoring, the DB was in direct contact with crews via radio to provide updates.

All observations have been recorded in a database, and a Survey Report Form was generated for each site check and monitoring (Attachment 1, *Pre-Demolition Biological Survey Forms*).

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*. No new crew members joined in the month of April.

The DB implemented specific impact avoidance measures and established ESAs for the two (2) active nests. Flagging and signage of construction areas and roads have been maintained around the barn owl nest (Figure 2, *Biological Resources Observations*). On April 8, 2020, the DB observed a bird (species unknown) sitting low on a nest in a tamarisk within the western retention basin. However, as this nest was located more than 150 feet from any work areas, no ESA signs were placed. On April 20, 2020, the DB monitored the great horned owls for more than four hours and determined the young are no longer dependent upon the nest, and therefore the nest was determined as inactive and all ESA signs were removed. During a weekly site check on April 27, 2020, the DB observed an active kestrel nest within an equipment box on the catwalk on the stack of Unit 1 (Attachment 1: Pre-Construction Survey Form 04/27/2020, page 5). Due to the vertical height (more than 200 feet) and direction of the opening, the DB determined that the no-work buffer would only need to include the stack itself and no ESA signs were placed.

Areas and Activities Monitored

A summary of the Weekly Site Checks and monitoring is included below (Table 1, *Summary of Activities in April*). All Weekly Site Check and Monitoring Forms are included in Attachment 1.

Figure 2, *Biological Resources Observations*, includes areas surveyed, sensitive biological resources observed and the location of current impact avoidance measures (ESA buffers) established onsite.

**TABLE 1
SUMMARY OF ACTIVITIES IN APRIL**

| Date | Time | Staff | Activity in Progress | Crews/ Equipment | Comments | Required Action Items |
|-----------|-----------|----------------------|---|--|---|--|
| 4/8/2020 | 0700–1000 | DB (Paulette Loubet) | Cleaning up debris at various locations onsite and pulling up concrete foundation near the west end of the cooling tower. | Water truck, excavator, rock cracker bobcat, forklift, work trucks | DB (Paulette Loubet) conducted a weekly site check. One new nest (species unknown) was observed in the southwest retention basin. | Inactive, non-raptor, non-special status nests should be removed as needed once approved by the DB. Activities near nest buffers require full-time monitoring. |
| 4/13/2020 | 0700–1000 | DB (Paulette Loubet) | Cleaning up and sort debris from cooling tower as well as wreck out equipment on the turbine deck of Unit 2. | Water truck, excavator, bobcat, forklift, work trucks, cutting torches, gantry crane | DB conducted a weekly site check. No new active nests were observed at the site. | Inactive, non-raptor, non-special status nests should be removed as needed once approved by the DB. Activities near nest buffers require full-time monitoring. |

TABLE 1
SUMMARY OF ACTIVITIES, *Continued*

| Date | Time | Staff | Activity in Progress | Crews/ Equipment | Comments | Required Action Items |
|-----------|-----------|----------------------|---|--|--|--|
| 4/20/2020 | 0600–1600 | DB (Paulette Loubet) | Wreck out equipment on the turbine deck of Units 1 and 2. | Water truck, excavator, bobcat, forklift, work trucks, cutting torches, gantry crane | DB conducted a weekly site check and full-time monitoring while the crews worked near the great horned owl nest buffer. No new active nests were observed at the site. | Inactive, non-raptor, non-special status nests should be removed as needed once approved by the DB. Activities near nest buffers require full-time monitoring. |
| 4/27/2020 | 0700–1030 | DB (Paulette Loubet) | Wreck out equipment on the turbine deck of Unit 1 | Water truck, excavator, bobcat, forklift, work trucks | DB (Paulette Loubet) conducted a weekly site check. One new nest (American kestrel) was observed in the top catwalk of the Unit 1 stack. The great horned owl nest was determined to be inactive and the ESA signs were removed. | Activities near nest buffers require full-time monitoring. |

Incident & Wildlife Observation Report

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

CONCLUSIONS

At every site visit conducted in April, the DB verified that no new migratory bird nests were present within currently active work areas, and clearance was granted for construction activities to continue. Monitoring will be required for Project activities that occur near the active kestrel or barn owl nest buffers.

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

- Weekly Site checks will occur May 4, 11, 18, and 25, 2020.
- The DB will continue to coordinate with construction management to schedule upcoming Pre-Demolition Surveys prior to the start of the next Project phases.

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

ATTACHMENT 1
PRE-DEMOLITION BIOLOGICAL SURVEY FORMS

**Inland Empire Energy Center Project
Pre-Construction Biological Survey Form**

| | | | |
|--|---|--------------------------------------|-------------|
| Date: Apr 8, 2020 | Observer: Paulette Loubet Designated Biologist (DB) | Start Time: 07:00 End Time: 10:00 | Page 1 of 5 |
| Visibility (circle one): Fair | | | |
| Precipitation (circle one): Light Rain | | | |

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

0700 DB arrived on site.

0715 Started full site check, crews mostly working to clean up the site and starting to pull up foundation from the water towers on the far west side of the cooling tower.

Observed ravens constructing a stick nest on the top level of the Unit 1 stack. Can be removed if crew can climb up to that level.

DB Surveyed around front buildings, down access road to cooling tower, around cooling tower and southern retention bond. Vegetation is filling out and pond holding quite a bit of water.

0730 Observed a new active nest in a tamarisk shrub on the south side of the basin. Due to the angle, visibility, vegetation the species was not able to be determined. The nest was more than 150 feet away from any construction activity so no ESA signs were established.

After continued site check of east side of cooling tower and retention pond. Observed two barn owls in box, one appears to be an adult and the other possibly a juvenile.

Continued site check around Unit 1, court yard, hazmat shed, around Unit 2 and the Silverado yard.

DB checked on great horned owls in Unit 2, only observed one chick (~6 weeks old) on beam below and east of the nest. No work currently occurring in Unit 2.

Observed that raven nest under air intake on Unit 2 was almost complete (photo below). However, nest is still under construction and can be removed

After completing the full site check the DB reviewed with Silverado (Brian) and reminded them to keep removing sticks from raven nest location on north side of Unit 2.

1000 DB left site

Habitat Description:

Developed portions of the site as well as water retention basin and surrounding areas

Species Observed (attach additional sheet if necessary):

| |
|--|
| Animals |
| Common raven, song sparrow, bushtit, European starling, pigeon, house sparrow, kestrel, great horned owl, barn owl, northern rough winged swallow, Anna's hummingbird, house finch, mourning dove, yellow rumped warbler |

Site Information

| |
|--|
| Overall habitat quality: 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, and roads |
| Threats: Demolition activities |
| Comments: None |

Photographs:



2020/04/08 07:13:52

Location of new raven nest construction on Unit1



2020/04/08 07:16:19

Crews working to break up concrete



2020/04/08 07:31:29

Location of new song bird nest in southern retention basin.



2020/04/08

09:07:51

Debris in courtyard being sorted and cleaned up



2020/04/08

09:20:35

Raven nest under air intake on Unit 1, can be removed



2020/04/08
09:37:58
33.7411 -117.167

**Inland Empire Energy Center Project
Pre-Construction Biological Survey Form**

| | | | |
|----------------------------------|---|--------------------------------------|-------------|
| Date: Apr 13, 2020 | Observer: Paulette Loubet Designated Biologist (DB) | Start Time: 07:00 End Time: 10:00 | Page 1 of 6 |
| Visibility (circle one): Good | | | |
| Precipitation (circle one): None | | | |

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

0700 DB arrived on site. Checked in with Silverado (Brian). Today and rest of the week crews working to clean up/haul and sort debris by cooling tower and within courtyard. Another crew working on Unit 2 turbine deck. Plan on starting Unit 1 turbine deck on Monday next week.

0715 Started full site check, starting at admin buildings and surveying access roads toward the cooling tower. Observed Silverado crew had removed raven nest that was under construction on top of Unit 2 stack.

Checked around cooling tower and southern retention bond. Due to amount of leaves could still not identify the species of the small active nest, but observed the female still incubating. All work was occurring more than 150 feet away.

0750 Observed a small cup nest (likely House finch) within the corner of the gas filter structure south of the cooling tower wall (photo below). Did not observe any activity at the nest, likely being constructed. However, it is within the barn owl nest buffer and structure not scheduled to be removed so did not establish additional ESA until nest becomes active (eggs or chicks).

Observed one barn owls in box (likely adult) too dark to see any other activity in the box. Chicks should be at least two weeks old (assuming eggs were laid week of 3/2).

Continued site check around Unit 1, court yard, hazmat shed, around Unit 2 and the Silverado yard.

DB observed that raven nest under the air intake on Unit 1 had been removed by Silverado however the ravens constructed a new nest on the platform next to it. The DB confirmed it was inactive and instructed Silverado to remove the nest material.

DB checked on great horned owls in Unit 1, observed 3 chicks (~7 weeks old) on beam below and east of the nest. Also observed both adult owls and a fresh kill (rabbit) that was placed near the chicks.

As work is scheduled to start on the turbine deck of Unit 1 next week the DB surveyed that level. At least two European Starling nests were observed (not protected) within the cable boxes of the gantry lift.

Additionally, the great horned owl nest site is completely visually exposed to the turbine deck.

After completing the full site check the DB reviewed with Silverado (Brian) and suggested monitoring for any work occurring on Unit 1 on the turbine deck to observe the great horned owls. Silverado suggested installing a plastic or cloth tarp across the structure between the owls and the work area create a visual barrier. The DB agreed this would be a good thing to do first thing Monday and would still need to be monitored.

1000 DB left site.

Habitat Description:

Developed portions of the site as well as water retention basin and surrounding areas

Species Observed (attach additional sheet if necessary):

| Animals |
|--|
| Common raven, song sparrow, bushtit, European starling, pigeon, house sparrow, kestrel, great horned owl, barn owl, northern rough winged swallow, Anna's hummingbird, house finch, mourning dove, yellow rumped warbler, Cassin's kingbird, Say's phoebe, lesser goldfinch, Cooper's hawk, red tailed hawk, black phoebe, ash throated flycatcher, northern mockingbird, Savannah sparrow, killdeer |

Site Information

| |
|--|
| Overall habitat quality: 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, and roads |
| Threats: Demolition activities |
| Comments: None |

Photographs:

Debris in courtyard to be sorted and hauled away.



Crew working to remove/haul debris from west end of cooling tower.



Location of nest construction observed (area circled left) and upclose of nest (right).



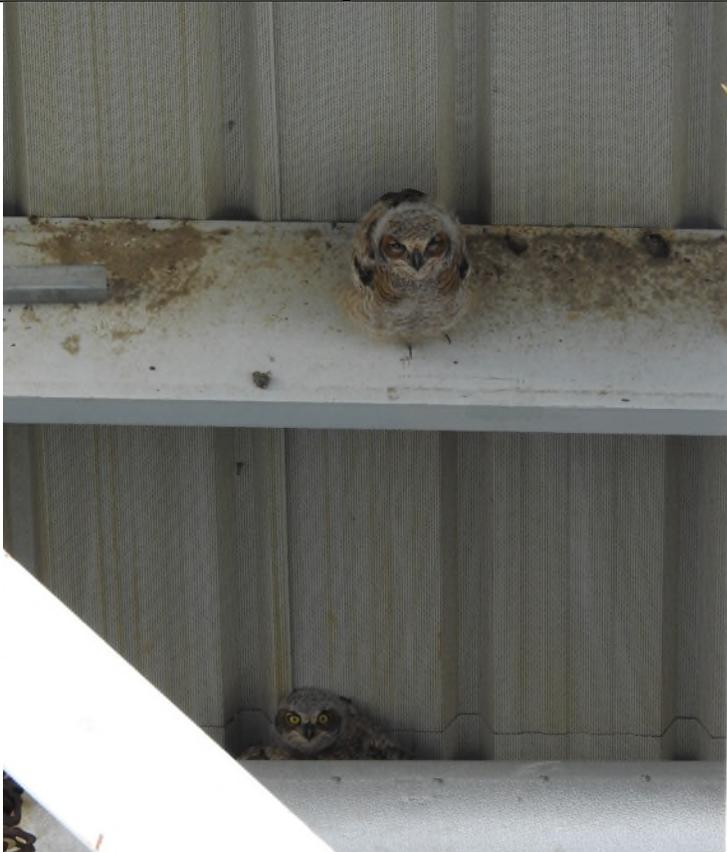
Debris and demo on east side of courtyard.



Crews working to remove equipment from turbine deck on Unit 2.



Turbine deck of Unit 1, facing east.



Great horned owl chicks in Unit 1.

**Inland Empire Energy Center Project
Pre-Construction Biological Survey Form**

| | | | |
|----------------------------------|---|--------------------------------------|-------------|
| Date: Apr 27, 2020 | Observer: Paulette Loubet Designated Biologist (DB) | Start Time: 07:00 End Time: 10:30 | Page 1 of 6 |
| Visibility (circle one): Good | | | |
| Precipitation (circle one): None | | | |

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

0700 DB arrived on site. Crews continuing to work on Unit 1 turbine deck to remove equipment with the crane.

0705 Started full site check, starting at admin buildings and surveying access roads toward the cooling tower. Checked around cooling tower and southern retention bond. The previously identified unknown song bird nest on the southwest end of the retention basin is now inactive (photo below). The amount of droppings around the rim of the nest suggests the chicks fledged; however, there were also holes in the nest and it is possible the nest was predated. There was no activity at the kingbird nest outside of the fence. Small cup nest (likely House finch) within the corner of the gas filter structure south of the cooling tower wall also did not have any activity and is still marked as inactive.

At the barn owl box, the DB observed at least 4 barn owl chicks. Chicks appear to be 35-42 days old (photo below).

Continued site check around Unit 2, the court yard, hazmat shed, around Unit 1 and the Silverado yard.

The DB observed that raven nest under the air intake on Unit 1 had been removed by Silverado and the Ravens have not attempted to rebuild in this area.

0830 the DB observed the great horned owls in Unit 2, all 3 chicks and both adult owls and a fresh kill (rabbit) that was nearby.

As the owls are no longer dependent on the nest in Unit 1 the DB removed the nest buffer and all ESA signs.

The DB observed a lot of nesting material (raven) in the southwest corner and instructed Silverado that it can be removed to prevent a nest from becoming active.

0830-0900 the DB observed a pair of kestrels at the top stack of Unit 1. The DB noticed there was an equipment box up on the catwalk with a hole in the side. The DB informed Silverado the pair may attempt to nest in the box they should have someone go up to check inside. Silverado (Aaron) climbed to the top of the Unit 1 stack and observed a female kestrel sitting on at least one egg in the north facing side of the box. Due to the vertical height and direction of the nest opening the DB determined that the buffer would only need to include the stack itself. Anticipated fledge date will be June 26, 2020.

Silverado (Aaron) also checked the matching box on Unit 2 and after confirming with the DB there was no nesting activity, closed up the whole on the side.

1030 DB left site.

Habitat Description:

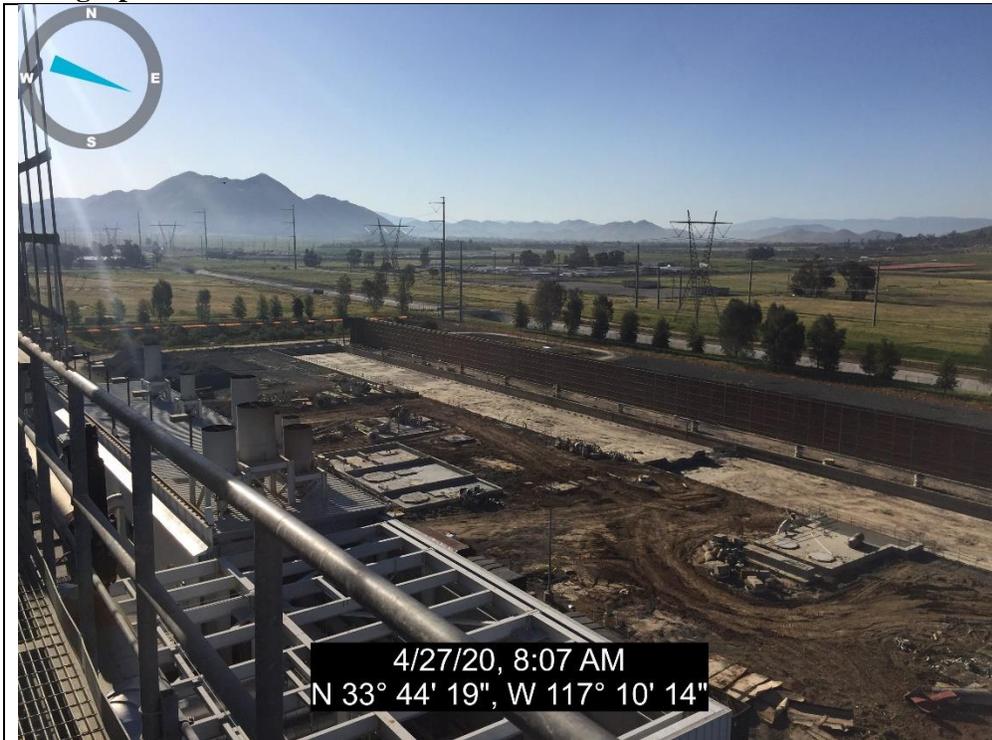
Developed portions of the site as well as water retention basin and surrounding areas

Species Observed (attach additional sheet if necessary):

| |
|--|
| Animals |
| Common raven, song sparrow, bushtit, European starling, pigeon, house sparrow, kestrel, great horned owl, barn owl, northern rough winged swallow, Anna's hummingbird, house finch, mourning dove, yellow rumped warbler, Say's phoebe, lesser goldfinch, Cooper's hawk, red tailed hawk, northern mockingbird, red winged black bird, black crowned night heron, blue grosbeak. |

Site Information

| |
|--|
| Overall habitat quality: 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, and roads |
| Threats: Demolition activities |
| Comments: None |

Photographs:

View of cooling tower area all cleaned up.



Inactive nest in southwest retention basin.



Barn owl chicks in box



Crews working to remove equipment from turbine deck on Unit 1.



Debris at east end of courtyard.



Great horned owl chicks and adult in Unit 2.





Equipment box on top stack of Unit 2. No active nest, opening was sealed.

**Inland Empire Energy Center Project
Pre-Construction Biological Survey Form**

| | | | |
|----------------------------------|--|-------------------------------------|-------------|
| Date: Apr 20, 2020 | Observer: Paulette Loubet Designated Biologist (DB) | Start Time: 06:00 End Time: 1600 | Page 1 of 7 |
| Visibility (circle one): Good | | | |
| Precipitation (circle one): None | | | |

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

0600 arrived on site and checked in.

0630 safety tailboard meeting. Crews finishing up on unit 2 turbine deck and some clean up in courtyard and cooling tower area. Then will move over to Unit 1 turbine deck.

0700 start site check down main access road and cooling unit.

Checked on active nest in southwest basin, observed one adult bird still sitting on nest. While observing the nest a Cooper's hawk flew past and snatched a kingbird chick out of a nest in a eucalyptus outside the fence (Photo below). Continued site check around basin and toward eastern basin. No activity at potential house finch nest, marked as old/inactive. DB observed see one adult barn owl and down from chick in the owl box. Decided to check again later when lighting was better.

Observed that Silverado had taken down raven stick nest construction on air intake and stacks of Unit 1 & 2 (Thursday last week). Silverado also put up visual barrier by owls on Unit 1 (photo below).

0800-0900 Checked on great horned owls in Unit 1. Observed all 3chicks and 1 adult on top of eastern silver vessel (photo below). Other adult lower in the rafters observed from ground level.

0900 Observed a mourning dove flying with nest material to a I beam on the outside of Unit 1 (west).

1000 Checked in with Silverado on progress of construction tasks and updated removed nest material

1030 Checked on barn owls again, observed at least two chicks (photo below).

1100-1200 crews stopped for lunch. DB surveyed turbine deck on Unit 2 to confirm no other active protected nests. No new protected nests were observed, several starling and pigeon nests.

1250 Silverado started to bring up equipment using crane. Owls did not move from perch or show signs of stress. DB continued full time monitoring while work areas was set up and crews started touching the outer shell of the turbine.

1530 DB determined activities for the rest of the day would not cause any new disturbance and stopped monitoring. Reminded crew of buffer boundary before leaving work area.

1600 DB checked out with ATC (Andy) and Silverado and left the site.

Habitat Description:

Complete site check including developed portions of the site, retention ponds and surrounding areas

Species Observed (attach additional sheet if necessary):

| |
|--|
| Animals |
| European starling, common, raven, rock pigeon, lesser gold finch, house finch, house sparrow, bushtit, song sparrow, kingbird, Cooper's hawk, red tailed hawk, barn owl, killdeer, says phoebe, black phoebe, American kestrel, great egret, or there rough wing swallow |

Site Information

| |
|--|
| Overall habitat quality: 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, and roads |
| Threats: Demolition activities |
| Comments: None |

Photographs:





Location of new active Kingbird nest in eucalyptus outside of the site boundary.



Eastern retention basin, lots of water and vegetaion.



Barn owl chicks observed (at least two).



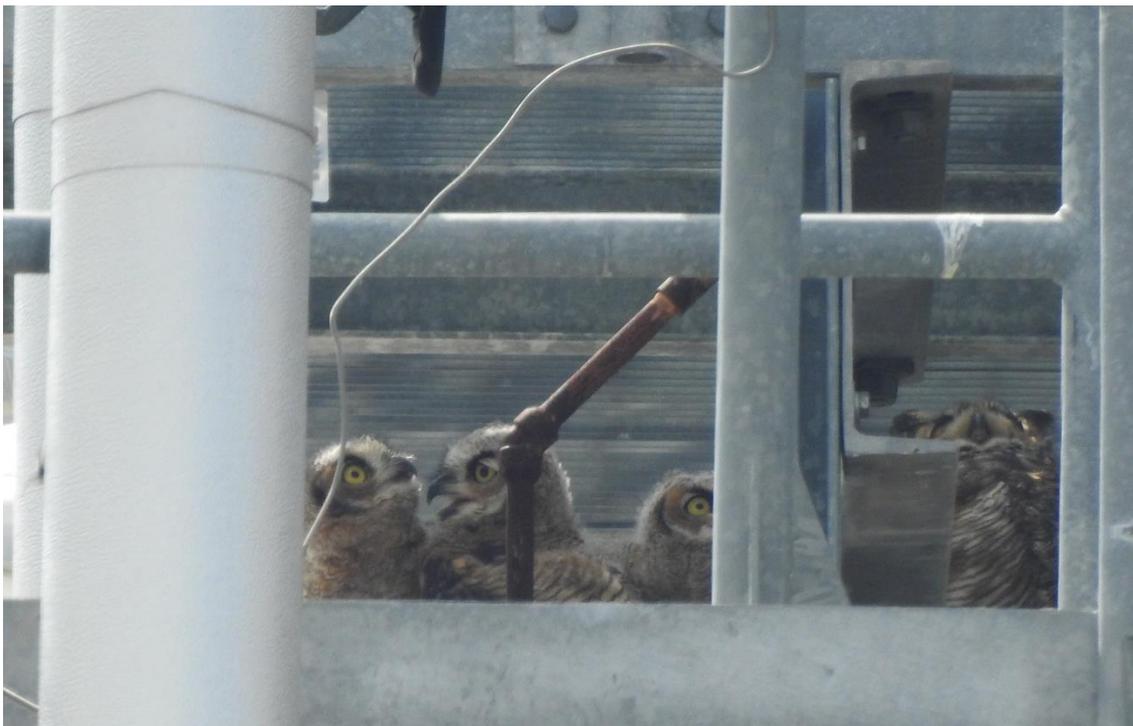
Cres removing parts from turbine deck on Unit 2.



Visual barrier installed by Silverado to block work area from owl nest site.



3 great horned owl chicks and adult perched on most eastern vessel on the top deck of Unit 2.



Close up of 3 great horned owl chicks and adult, taken from turbine deck on Unit 2.



Silverado Crew working to bring up equipment to the turbine deck on Unit 1.

ATTACHMENT 2
ENVIRONMENTAL TRAINING PROGRAM SIGN-IN SHEET

CERTIFICATE OF COMPLETION

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

Date: 2/24/2020

Instructor(s) Paulette Labet

- ❖ 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 # |
|-------------------|------------------|-----------|----------|---------|------------------|
| Brian LACRIN | | SILVERADO | | | |
| Michael Hernandez | | Silverado | | | |
| Jerry SANDWAR | | SILVERADO | | | |
| JOHN MURPHY | | SILVERADO | | | |
| Jorge Garcia | | Silverado | | | |
| MARCO MURCUSA | | SILVERADO | | | |
| PAUL AVILA | | ATC-C | | | |
| Alexis Pelido | | ATCGS | | | |
| BILL GLEASON | | ATCGS | | | |
| Doug Simms | | TRB | | | |
| Jorge Valencia | | SCI | | | |
| Darin Perez | | SCI | | | |
| Sankaraj Gnan | | SCI | | | |
| JOSIE del TORO | | SCI | | | |
| Ricardo Jarama | | SCI | | | |

STEVE HEARD SCI
 Sid Duran SCI
 Keith Knudston SCF