

DOCKETED

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Project Title:	Inland Empire Energy Center Project Compliance
TN #:	235873
Document Title:	Monthly Compliance Report for August 2020
Description:	N/A
Filer:	Paul Kihm
Organization:	Latham & Watkins LLP
Submitter Role:	Applicant Representative
Submission Date:	12/7/2020 4:50:20 PM
Docketed Date:	12/7/2020

September 14, 2020

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

RE: Monthly Compliance Reports (MCR) for August 2020

Dear Mr. Winstead;

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



Jim Nuccio
732-859-0525
Jim.nuccio@atcgs.com

CC: IEEC/GE Power Project Team

Attachment A
Air Quality Construction Mitigation Monthly
Report – August 2020

AIR QUALITY CONSTRUCTION MITIGATION REPORT

IEEC DEMOLITION PROJECT

MONTHLY REPORT AUGUST 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 August, 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 thirty-seven (37) Equipment Tags have been issued for individual diesel fueled mobile off-road vehicles to operate at the site. Most of these vehicles were no longer on the site by the end of August.

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

- 13 Excavators (only 8 of which were present at the site at the end of August)
- 2 Front-End Loaders (neither of which was present at the site anytime in August)
- 5 Skid-Steer Loaders (only 2 of which were still present at the site anytime in August)
- 2 Forklifts (only 1 of which was still present at the site anytime in August)
- 1 Aerial Lift (not present at the site anytime during August)
- 11 Boom Lifts (only 3 of which were still present at the site at the end of July)
- 1 Tracked Loader
- 2 Off-Road Cranes (neither of each was still present at the site at end of August)

1b. Compliance Status of Portable Equipment

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

- 1 Generator Set (75 KW) (present at the site for only a short timee during July)
- 3 Air Compressors (185 CFM) (only 1 of which was present at the site anytime in July)

All mobile off-road equipment, as well as all portable equipment, present at the IEEC project during August, 2020 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 fuel invoices were reviewed semi-monthly 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 (Dion and Sons 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

No new on-road vehicle fleets were used during August, 2020. All of the on-road vehicle fleets currently being utilized at the IEEC project remained in full 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 during each day of operation by State of California ARB Certified Visible Emission Evaluators (VEE) Andy Pulido and Paul Weir. 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.

The demolition work accomplished in August, 2020 consisted primarily of the mass wrecking of both the Unit # # 1 and 2 turbine structure and concrete decks, as well as the demolition and processing of foundations in the cooling tower courtyard.

The HRSG steam vessels and silencers from both Units were removed by excavator and off-road crane, and included the removal of both exhaust stacks. Work proceeded on demolishing the gantry crane and supporting structures of both units.

Additional work involved the processing of steel, trash and concrete for off-site removal, with approximately 3,100 tons of material being loaded into trucks and then hauled off-site in the month of August.

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 to the demolished materials before and during loading into on-highway trucks for removal from the site.

ATTACHMENT 1

AUGUST 2020

STATUS OF DIESEL FUELED EQUIPMENT AUTHORIZED AT SITE

A. MOBILE OFF-ROAD EQUIPMENT

EQUIPMENT TAG	MAKE & MODEL	ON-SITE?	
		AT START OF MONTH	AT END OF MONTH
EXCAVATORS			
ME-1-01-A	75X3 LINKBELT	NO	NO
ME-1-02-D	1200 HITACHI	YES	YES
ME-1-03-A	490 LINKBELT	NO	NO
ME-1-04-A	350X4 LINKBELT	NO	NO
ME-1-05-A	870 HITACHI	YES	YES
ME-1-06-A	350 LINKBELT	NO	NO
ME-1-07-A	750 LINKBELT	YES	YES
ME-1-08-A	490 LINKBELT	YES	YES
ME-1-09-A	490 LINKBELT	YES	YES
ME-1-10-B	250 LINKBELT	YES	YES
ME-1-11-A	750 LINKBELT	YES	YES
ME-1-12-A	R924 LIEBHERR	NO	NO
ME-1-13-A	250 LINKBELT	NO	YES
FRONT-END LOADERS			
ME-4-01-A	JOHN DEERE 544L	NO	NO
ME-4-02-A	JOHN DEERE 544L	NO	NO
SKID-STEER LOADERS			
ME-5-01-E	T590 BOBCAT	NO	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
OFF-ROAD CRANES			
ME-6-01-A	LR1300 LIEBHERR	YES	NO
ME-6-02-C	GROVE 225	NO	YES
FORKLIFTS			
ME-7-01-E	12 K GRADEALL	YES	YES

A. MOBILE OFF-ROAD EQUIPMENT (CONTINUED)

EQUIPMENT TAG	MAKE & MODEL	ON-SITE?	
		AT START OF MONTH	AT END OF MONTH
BOOM LIFTS			
ME-8-01-E	JLG 600S	NO	NO
ME-8-02-E	SKYJACK SJ63AJ	YES	NO
ME-8-03-E	GENIE	NO	NO
ME-8-04-E	SKYJACK SJ86T	NO	NO
ME-8-05-E	GENIE S-85	YES	NO
ME-8-06-E	GENIE S-125	YES	NO
ME-8-07-E	GENIE S-85	YES	YES
ME-8-08-E	GENIE SX-125	YES	YES
ME-8-09-E	GENIE SX-125	YES	YES
ME-8-10-E	GENIE SX-180	NO	YES
ME-8-11-E	JLG 1350SJP	NO	YES
AERIAL LIFTS			
ME-9-01-E	JLG 600 AJ	NO	NO
TRACKED LOADERS			
ME-10-01-C	CAT 973D	YES	YES

B. PORTABLE EQUIPMENT

EQUIPMENT TAG	MAKE & MODEL	ON-SITE?	
		AT START OF MONTH	AT END OF MONTH
GENERATOR SETS			
PE-1-01-A	75 KW GEN-SET	YES	NO
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

AUGUST, 2020

ULTRA LOW SULFUR DIESEL FUEL EXAMPLE INVOICES

	SUPPLIER	DATE	INVOICE NUMBER	AMOUNT
2-A	Flyers	8/15/20	CFS-2358159	510 GALLON
2-B	Dion and Sons, Inc.	8/28/20	1471458	400 GALLON

ATTACHMENT 2-A

AUGUST 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

FLYERSENERGY LLC

8/15/2020

CFS-2358159

510 GALLON



2360 Lindbergh Street • Auburn, CA 95602

(800) 899-2376

(800) 899-2376



Fuel Card Invoice

RECEIVED AUG 24 2020

CLOSING DATE	INVOICE DATE	DUE DATE
08/15/2020	08/15/2020	9/1/2020
ACCOUNT NUMBER	INVOICE NUMBER	INVOICE AMOUNT
14807	CFS-2358159	

Due by Tue 09/01/2020 (Net 15 Days)

26.539737.D11 1 of 4

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

090120 00014807 0001339008 5



Riverside CA Cardlock at 3020 E. La Cadena Dr. is now open.

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
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Card Processing Invoice



Silverado Contractors, Inc.

Account: 14807

Original Page: 2

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

Date/Time	Card	Site	Product	Veh	Manual	Odometer	MPG	Units	Unit Price	Amount
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Card Processing Invoice

Silverado Contractors, Inc.

Account: 14807

Original Page: 3

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

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

2198586 - FEDERICO MACIAS

08/06/20	5:46p	2198586	Azusa, CA - 6261	DEF	0000	200,005	999.99	4.32	3.05000	13.19
08/06/20	5:46p	2198586	Azusa, CA - 6261	Diesel #2	0000	200,005	999.99	53.57	3.01484	161.49
08/14/20	5:17p	2198586	Azusa, CA - 6261	Diesel #2	0000	200,005	0.00	64.44	2.99663	193.10
2198586 - FEDERICO MACIAS Total								122.33		367.78

Card Processing Invoice



Silverado Contractors, Inc.

Account: 14807

Original Page: 4

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

Date/Time	Card	Site	Product	Veh	Manual	Odometer	MPG	Units	Unit Price	Amount
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Card Processing Invoice

Silverado Contractors, Inc.

Account: 14807

Original Page: 5

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

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

Card Transaction Totals

Invoice Fees

Total

Regulatory Compliance Fee

0.00

4.99

Tax Summary

Tax Authority/Tax

Exception
Certificate

Tax Basis

Tax
Rate

Actual
Tax Amount

CA County Alameda - Alameda County Transit Tax			2.00000 %	
CA County Alameda - Alameda County Transit Tax			2.50000 %	
CA County Contra Costa - Contra Costa Tax			1.00000 %	
CA County Los Angeles - Los Angeles County Transit T			2.25000 %	
CA County Merced - Merced County District Tax			0.50000 %	
CA County Monterey - Monterey County District Tax			0.50000 %	
CA County Sacramento - Sacramento County			0.50000 %	
CA County San Bernardino - San Bernardino County			0.50000 %	
CA County San Francisco - San Francisco Cnty Transit			1.25000 %	
CA County San Joaquin - San Joaquin County Transit T			0.50000 %	
CA County San Mateo - San Mateo County Transit Tax			2.00000 %	
CA County Santa Clara - Santa Clara County Transit T			1.75000 %	
CA County Santa Cruz - Santa Cruz County			1.75000 %	
CA County Sonoma - Sonoma County Transit Tax			1.00000 %	
CA County Stanislaus - Stanislaus Cnty S.T.C.L.T. Tax			0.62500 %	
California Environmental - AB32 Imp fees - DSL			0.00324	
California Environmental - AB32 Imp fees - GAS			0.00278	
California Excise Tax - Ca Diesel Excise			0.38500	
California Excise Tax - Ca Gas Excise			0.50500	
California Sales Tax - CA Sales Tax			7.25000 %	
California Sales Tax - CA Sales Tax - DSL			13.00000 %	
California Sales Tax - CA Sales Tax - GAS			2.25000 %	
California Sales Tax - CA Sales Tax - RED			7.25000 %	
Concord, CA - City of Concord			0.50000 %	
Federal Excise Tax - Fed Excise DSL (incl LUST)			0.24400	
Federal Excise Tax - Fed Excise Eth 10%			0.18400	
Federal Excise Tax - Federal LUST			0.00100	
Federal Excise Tax - Federal Oil Spill Tax DSL			0.00214	
Federal Excise Tax - Federal Oil Spill Tax Eth			0.00193	
Marina, CA - City of Marina Trans & Use			1.50000 %	
Rancho Cordova, CA - Rancho Cordova Trans & Use			0.50000 %	
Richmond, CA - City of Richmond Sales Tax			1.00000 %	
Salinas, CA - City of Salinas Sales Tax			1.50000 %	
San Jose, CA - City of San Jose			0.25000 %	
San Leandro, CA - San Leandro Trans & Use Tax			0.50000 %	
Santa Rosa, CA - City of Santa Rosa Sales Tax			0.75000 %	
South El Monte, CA - City of South El Monte			0.50000 %	
South San Francisco, CA - City of South San Francisco			0.50000 %	
Tracy, CA - City of Tracy Trans & Use Tax			0.50000 %	
Underground Storage Fee - Underground Storage Tank			0.02000	
Watsonville, CA - City of Watsonville Sales Tax			0.75000 %	

Tax Summary Total

Recap by Card Reporting Group and Card

Units

Amount

Taxes

Total

Card Processing Invoice



Silverado Contractors, Inc.

Account: 14807

Original Page: 6

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

<i>Recap by Card Reporting Group and Card</i>	Units	Amount	Taxes	Total
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<i>Recap by Product</i>	Units	Amount	Taxes	Total
10 - C-Store	1.00-			
87Eth C/L - Regular	462.07			
89Eth C/L - Midgrade	143.99			
91Eth C/L - Premium	27.75			
DEF OD - DEF	50.06			
Dsl #2 C/L - Diesel #2	3,274.21			
Red #2 C/L - Dyed DSL	509.69			

Card Processing Invoice

Silverado Contractors, Inc.

Account: 14807

Original Page: 7

Invoice Date: 08/15/2020

Invoice No: CFS-2358159

<i>Invoice Total</i>	Units	Amount
----------------------	-------	--------

**** <i>Payment Terms Summary</i> ****
Due by Tue 09/01/2020 (Net 15 Days)

ATTACHMENT 2-B

AUGUST 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

DION AND SONS, INC. 8/28/2020 1471548 400 GALLON



- ◆ FUELS
- ◆ LUBRICANTS
- ◆ SOLVENTS
- ◆ CARDLOCK
- ◆ INDUSTRIAL SERVICES

QUALITY ◆ INTEGRITY ◆ SERVICE
SINCE 1930

2100 W. KEY STREET COLTON, CA 92324-6505
888-424-DION 951-680-9731 FAX: 951-680-9737

DYED DIESEL

BILL OF LADING	NUMBER	K471548
ORDER	DATE	08-28-20
	DELIVERY DATE	08-28-20

29007

14

PAGE

SOLD
TO

SILVERADO CONTRACTORS, INC.
2855 MANDELA PARKWAY
2ND FLOOR
OAKLAND, CA 94608

MEMPHIS POW20-005
24224 ANTELOPE RD
SUN CITY, CA 93355

CUSTOMER ORDER NUMBER	ORDERED BY	DUE DATE
20-005	KEEP FULL	NET 15 DAYS
SHIP VIA	TAKEN BY	ORDER DATE
OUR TRUCK		08-28-20

THIS PRODUCT IS DYED DIESEL FUEL.
NONTAXABLE USE ONLY. PENALTY
FOR TAXABLE USE. THIS FUEL MEETS
EPA REQUIREMENTS FOR SULFUR
AND CETANE INDEX OR AROMATIC
CONTENT.

QUANTITY	PACKAGE	CODE	DESCRIPTION	PRICE / PACKAGE	EXTENSION
500	10:10TH GAL	31ULD-WHRED	NA1992, DIESEL FUEL, COMBUSTIBLE LIQUID, PG 111 NONTAXABLE USE ONLY, PENALTY FOR TAXABLE USE CA DEL FUEL. MAX 15PPM SULFUR DYED ULG CARB DIESEL FUEL DELIVERY WINDOW: DNI 08:00-17:00 20-0005 1-0180		

DRIVER	BULK	B A R R E L	DEL.	RET.	CHG.	CREDIT	QUANTITY RECEIVED IN GOOD ORDER	T O T A L
BS 330 X							X	

This is to certify that the above-named materials 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. Per Dion & Sons.

DUPLICATE

EMERGENCY CONTACT NUMBER
(800) 688-3172

DION AND SONS

START 08/28/20 04:37:25

FINISH 08/28/20 05:13:49

START COUNT 0.0 GALLONS

END GROSS COUNT 400.0 GALLONS

GROSS DELIVERY 400.0 GALLONS

DISTILLAT1

SALE NUMBER 22130

METER NUMBER 46114346

UNIT ID TRUCK 330

* MULTIPLE DELIVERIES AT ONE SITE *

=====

Dion & Sons, Inc.

Sawyer Petroleum.

Phone: (562)432-3946

1543 W. 16th Street

Long Beach, CA 90813

=====

MENIFEE P020005

26226 ANTELOPE RD

SUN CITY, CA 92585

Date : 08/28/2020

Ticket #: 330-22130

Client #: 89007 14

P.O. # : k471548

S.O. # : k471548

Driver : Samuelson Brian

=====

EXEMPT VEHICLES/TANKS:

FUEL TYPE: RED

VehID	Description	Gallons
96794	490	84.3
96797	500G Tank	177.9
Total Gallons:		262.2

=====

NON-EXEMPT VEHICLES/TANKS:

FUEL TYPE: RED

VehID	Description	Gallons
102247	10411577	2.8
102246	858	95.9
102637	860	0.0
102636	973d	39.1
Total Gallons:		137.8

=====

Client Total Gallons 400.0

MTR ID	Beg	End	TOTAL
MTR1	10245837.5	10246237.5	400.0

=====

Attachment B
Monthly Biological Survey Report
August 2020

September 9, 2020
Job Number: 1104-015
IEEC Decommissioning - Monthly Monitoring Report

MEMORANDUM FOR THE RECORD

2.6 1104-015.M07

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 – August 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 August 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 August 3, 10, 17, 24, and 31, 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 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 that would be impacted within 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.

No new active nests were observed during the month of August. Bird activity throughout the Project area has greatly decreased, especially within the active work areas likely due to the number of active equipment, the amount of heavy demolition and the reduced number of structures onsite.

There are no active nests or nest buffers on site, therefore no full-time monitoring was required during the month of August.

Anticipated Project activities for September 2020 include continued structural demolition of Units 1 and 2, and continued clearing and sorting debris to be hauled off-site. As of August 31, 2020 (close of nesting bird season) weekly site checks will no longer be required. Only monthly site checks will be required for the remainder of Project 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 August 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 August 2020 included five (5) weekly site checks.

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. As the whole site has remained active, no Pre-Demolition Surveys were conducted in the month of August. Additionally, with no active bird nests or nest buffers, full-time monitoring was not required.

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

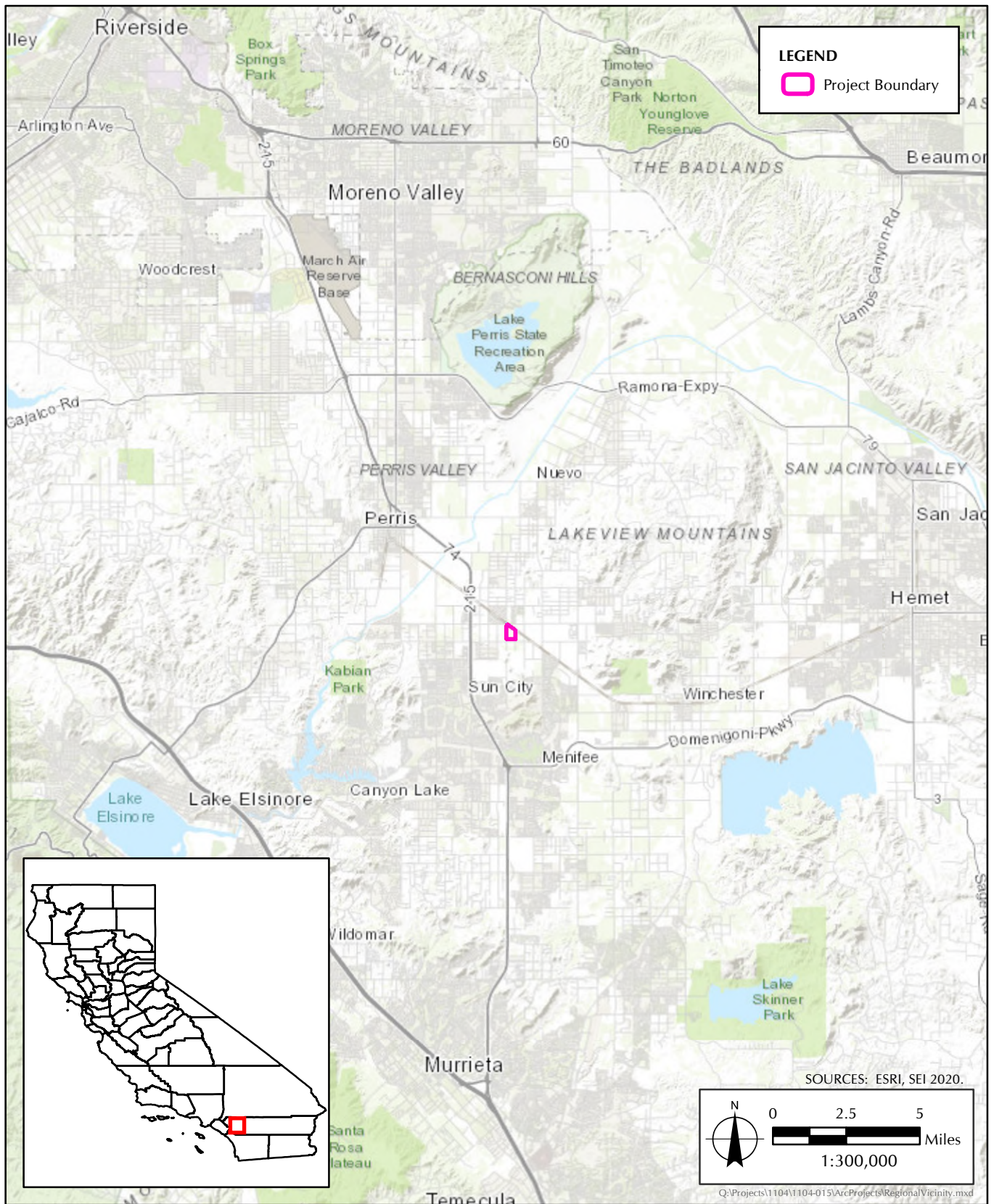


FIGURE 1
Regional Vicinity Map

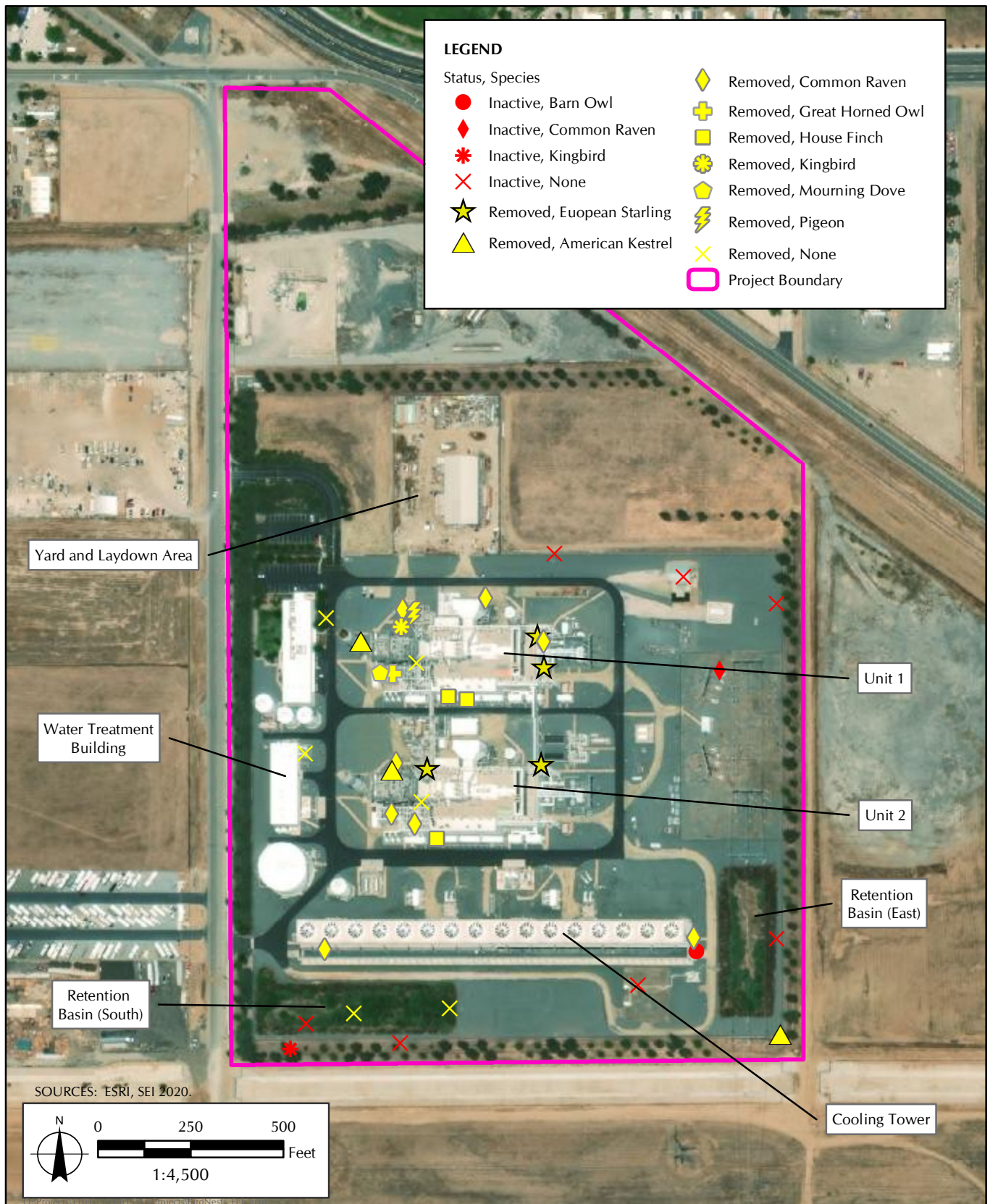


FIGURE 2

Biological Resources Observations



In compliance with the BRMIMP, once a Pre-Demolition Survey is completed and a work area was established, monitoring can be 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.

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 August.

As of the end of June there are no active nests or nest buffers on site. No new active nests were observed during the month of July or August, and no impact avoidance measures were established. Onsite bird activity has greatly decreased within the developed areas likely as a result of the amount equipment in use and heavy demolition occurring.

Areas and Activities Monitored

A summary of the Weekly Site Checks is included below (Table 1, *Summary of Activities in August*). All Weekly Site Check Forms are included in Attachment 1. Due to the amount of demolition activity, safety concerns and construction area hazards, the DB could not enter or get very close to the remaining structures. Figure 2, *Biological Resources Observations*, includes areas surveyed, sensitive biological resources observed on site as of August 2020.

TABLE 1
SUMMARY OF ACTIVITIES IN AUGUST

Date	Time	Staff	Activity in Progress	Crews/ Equipment	Comments	Required Action Items
8/3/2020	0700–0900	DB (Paulette Loubet)	Cleaning up and hauling off of stockpiled materials. Most of site still on stand down after incident.	Water truck, excavators, and work trucks	DB (Paulette Loubet) conducted a weekly site check. No new nests were observed.	None. No active nests or nest buffers on site.
8/10/2020	0650–0800	DB (Paulette Loubet)	At Unit 2 cutting and demo with crane. Two excavators loading debris and a third crew working on Unit 1	Crane, water truck, excavators, bobcat, forklift, boom lift and work trucks	DB conducted a weekly site check. No new nests were observed site.	None. No active nests or nest buffers on site.
8/17/2020	0640–0740	DB (Paulette Loubet)	Both stacks (Unit 1 and 2) have been removed. One crew cracking concrete on Unit 1.	Water truck, excavators, bobcat, forklift, work trucks	DB conducted a weekly site check. No new nests were observed.	None. No active nests or nest buffers on site.
8/24/2020	0645–0745	DB (Paulette Loubet)	One excavator loading debris. Two boom lifts cutting on west side of Unit 2. One crew working to demo east side of Unit 1.	Water truck, excavators, bobcat, forklift, work trucks	DB conducted a weekly site check. No new nests were observed.	None. No active nests or nest buffers on site.
8/31/2020	0645–0800	DB (Paulette Loubet)	Seven different excavators sorting and filling trucks. Two boom lifts cutting on west side of Unit 2.	Water truck, excavators, bobcat, forklift, work trucks	DB conducted a weekly site check. No new nests were observed site.	None. No active nests or nest buffers on site.

Incident & Wildlife Observation Report

No Incident & Wildlife Observation Report forms were completed for the month of August.

CONCLUSIONS

At every site visit conducted in August, 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. As of June 29, 2020, there are no active nests or nest buffers on site.

As of August 31, 2020 weekly site checks are no longer required, and the DB will only conduct monthly site checks for the remainder of Project activities.

In compliance with the BRMIMP and the IEEC Closure Plan Staff Analysis and Recommendation prepared for the Project, Monthly Monitoring Reports will be submitted by the 10th of each month to summarize observations made by the DB during monthly site checks.

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: Aug 3, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 07:00 End Time: 0900	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.

All Silverado, GE and ATC crew members were participating in a safety meeting due to stand down last week. DB participated in meeting.

0800 DB conducted full site check around both units. Due to safety concerns could not enter or get very close to either Units. Area around crane was also roped off and for authorized personnel only.

DB Surveyed around cooling tower, switch yard, hazmat shed and lay down yard.

No nesting activity observed anywhere onsite. Db also did not observe any great horned owl or barn owls on site. Very little bird activity within the work areas on site with most birds observed foraging in the retention basins.

Habitat Description: All developed portions of the site and two retention basins.

Species Observed (attach additional sheet if necessary):

Animals
Starling, Rock pigeon, raven, black phoebe, Anna's hummingbird, song sparrow, Nuttall's woodpecker, blue grosbeak, red tailed hawk, lesser goldfinch, house finch, brush rabbit

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:

Photographs:



North side of Unit 1 and the crane, facing east.



South side of Unit 1, looking east



Court yard and Unit 2, looking south.



South side of Unit 2, looking east.



East side of Unit 2, facing west.



Unit 2, facing west.



Southeast side of Unit 1 and courtyard, facing west.



East side of Unit 1 facing west.

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

Date: Aug 10, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 06:50 End Time: 08:00	Page 1 of 6
Visibility (circle one): Good			
Precipitation (circle one): None			

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

0640 DB arrived on site.

One crew was on top of Unit 2 cutting pieces and lowering them with the crane. Another two excavators were loading material onto trucks and a third crew was working on the east side of unit 1. Completed full site visit.

DB Surveyed around cooling tower, switch yard, hazmat shed and lay down yard.

No nesting activity observed. Only observed three pigeons within work areas, most of the other species observed occurred in the basins.

Did not observe any great horned owl or barn owls on site.

0800 DB checked out with ATC and Silverado teams and left the site.

Habitat Description:

All developed portions of the site and the retention basins

Species Observed (attach additional sheet if necessary):

Animals
Pigeon, black phoebe, bushtit, Anna's hummingbird, brush rabbit.

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:



Northwest side of Unit 2



West side of Unit 1



West side of Unit 2



Concrete sorting in the cooling tower area



West side of both units



South west retention basin and area behind cooling tower wall



East side of both Units from the edge of the switch yard.



East side of Unit 1



North east side of Unit 1

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

Date: Aug 17, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 06:40 End Time: 07:40	Page 1 of 5
Visibility (circle one): Good			
Precipitation (circle one): None			

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

0640 DB arrived on site.

Both top halves of the stacks on Unit 1 and 2 have been removed. One crew was working on crack concrete on the side of Unit 1. Other excavators were loading material onto trucks and sorting rubble. DB Completed full site visit around cooling tower, retention basin, switch yard, hazmat shed and lay down yard.

No nesting activity observed. Only observed a few pigeons within work areas, most of the other species observed in the basins foraging.

Did not observe any great horned owl or barn owls on site.

0740 DB checked out with ATC and Silverado teams and left the site.

Habitat Description:

All developed portions of the site and the retention basins

Species Observed (attach additional sheet if necessary):

Animals
Pigeon, black phoebe, song sparrow, Anna's hummingbird, American kestrel, European starling, brush rabbit.

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:



Unit 2, with stack removed, looking south.



Unit 1, with stack removed looking north east.



Unit 1 and 2 looking north with crane in operation.



Southwest retention basin, looking west.



Southeast retention basin looking northwest.



East side of Unit 2, looking west.



East side of Unit 1, looking west.



Cut parts of the stack from Unit 1.

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

Date: Aug 24, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 06:45 End Time: 07:45	Page 1 of 5
Visibility (circle one): Good			
Precipitation (circle one): none			

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

0645 DB arrived on site and checked in with Silverado team.

One excavator was loading up debris by the north side of Unit 1. Two boom lifts were cutting the structure on west side of unit 2. One other crew was working to demo the east side of Unit 1.

DB Completed full site visit around cooling tower, retention basis, switch yard, hazmat shed and lay down yard.

No nesting activity observed. Only observed a few pigeons within work areas, on top of the remaining structures. Most of the other bird species observed were in the retention basins.

DB did not observe any great horned owl or barn owls on site.

0745 DB checked out with ATC and Silverado teams and left the site.

Habitat Description: All developed portions of the site and the retention basins

Species Observed (attach additional sheet if necessary):

Animals
Rock pigeon, Anna's Hummingbird, Black Phoebe, European starling, red tailed hawk, song sparrow, northern mockingbird, bushtit.

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:



South side of Unit 1, facing east.



West side of Unit 2, facing west.



Unit 1 and 2, facing north east.



Southwestern retention basin, facing west.



Eastern retention basin facing northwest.



Courtyard and Unit 1, facing west.



Unit 1, east side, facing northwest.



East side of Unit 2, facing southwest.

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

Date: Aug 31, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 06:45 End Time: 08:00	Page 1 of 9
Visibility (circle one): Good			
Precipitation (circle one): None			

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

0645 DB arrived on site and checked in with Silverado team.

Seven different excavators onsite mostly sorting and placing material into trucks to be hauled off. Two boom lifts were cutting the structure on west side of Unit 2.

DB Completed full site visit around cooling tower, retention basin, switch yard, hazmat shed and lay down yard.

No nesting activity observed. Only observed a few pigeons and starlings within work areas, on top of the remaining structures. Most of the other bird species observed were in the retention basins.

DB did not observe any great horned owl or barn owls on site.

0745 DB checked out with ATC and Silverado teams

0800 DB left the site.

After August 31st nesting bird season is over and this report includes the last weekly site visit. The DB will continue to visit the site one each month until project completion.

Habitat Description: All developed portions of the site and the retention basins

Species Observed (attach additional sheet if necessary):

Animals
Canada goose (fly over), Rock pigeon, Anna's Hummingbird, Black Phoebe, European starling song sparrow, bushtit.

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:



North side of Unit 1, facing east.



North side of Unit 2, facing southeast



South side of Unit 1, facing east.



West and south side of Unit 2 facing east



Southwest retention basin, facing west.



South side of cooling unit wall, facing west.



End of cooling tower wall and side of eastern basin, facing north.



Gas line area, facing west.



Eastern basin, facing south.



East end of Unit 2, facing west.



Courtyard and Unit 1 facing northwest.



East side of Unit 1, facing northwest.



Hazmat Shed, facing northeast.



Switch Yard, facing southeast.



North side of Unit 1 and truck station, facing west.



Laydown yard, facing south.

ATTACHMENT 2
ENVIRONMENTAL TRAINING PROGRAM SIGN-IN SHEET

CERTIFICATE OF COMPLETION

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

Date: 2/24/2000

Instructor(s) Paulette Lambert

- ❖ 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 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 Labin	<i>[Signature]</i>	Silverado			
Michael Hernandez	<i>[Signature]</i>	Silverado			
Jimmy Sanderson	<i>[Signature]</i>	Silverado			
Travis V. V. V.	<i>[Signature]</i>	Silverado			
George Garcia	<i>[Signature]</i>	Silverado			
Marko M. M.	<i>[Signature]</i>	Silverado			
Paul A. A.	<i>[Signature]</i>	ATC-C			
Angelo Pulido	<i>[Signature]</i>	ATC-GS			
Bill Gleason	<i>[Signature]</i>	ATC-GS			
Doug Simms	<i>[Signature]</i>	TRB			
Joseph Valenzuela	<i>[Signature]</i>	SCI			
Dan P. P.	<i>[Signature]</i>	SCI			
Subash G. G.	<i>[Signature]</i>	SCI			
Wally J. J.	<i>[Signature]</i>	SCI			
Ricardo J. J.	<i>[Signature]</i>	SCI			
Steve Head	<i>[Signature]</i>	SCI			
Sid Garcia	<i>[Signature]</i>	SCI			
Keith Knudsen	<i>[Signature]</i>	SCI			