DOCKETED	
Docket Number:	01-AFC-17C
Project Title:	Inland Empire Energy Center Project Compliance
TN #:	235874
Document Title:	Monthly Compliance Report for September 2020
Description:	N/A
Filer:	Paul Kihm
Organization:	Latham & Watkins LLP
Submitter Role:	Applicant Representative
Submission Date:	12/7/2020 4:52:16 PM
Docketed Date:	12/7/2020



October 9, 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 September 2020

Dear Mr. Winstead;

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

AIR QUALITY CONSTRUCTION MITIGATION REPORT IEEC DEMOLITION PROJECT

MONTHLY REPORT SEPTEMBER 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 September, 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

No new Equipment Tags were issued for individual diesel fueled mobile off-road vehicles in the month of September. A total of thirty-seven (37) Equipment Tags have been issued for mobile off-road vehicles to operate at the site. Most of these vehicles were no longer on the site by the end of September.

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

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 September, as described in ATTACHMENT 1B:

- 1 Generator Set (75 KW) (not present at the site anytime during September)
- 3 Air Compressors (185 CFM) (only 1 of which was present at the site anytime in September)

All mobile off-road equipment, as well as all portable equipment, present at the IEEC project during September, 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 only fuel vendor in September, Dion and Sons, are found in ATTACHMENT 2. Copies of all fuel invoices are kept available for review in the ATC office located on-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 fleet that will operate at the IEEC project, was received and reviewed:

•	J Madrid Trucking	Fleet ID 90074	Expires December 31, 2020
•	ACA SAL Corporate	Fleet ID 142768	Expires December 31, 2020
•	Cabedian Trucking	Fleet ID 31902	Expires December 31, 2020
•	Gabriel Garcia Trucking	Fleet ID 94293	Expires December 31, 2020
•	Silva Trucking	Fleet ID 39755	Expires December 31, 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 work accomplished in September, 2020 consisted of continuing the demolition of the structure of both Unit #1 and Unit #2, the isolation and torch cutting of the Unit #2 HRSG, completing the work on demolishing several modules of Unit #2, and preparation of the crushing area in the cooling tower yard.

By mid-month, the pullover of the Unit #2 Gantry Crane had been completed and pulldown and demolition of the Unit #2 transition ducts had begun.

Late in the month, the demolition of the Unit #2 HRSG structure was completed and work was initiated on the isolation and torch cutting of the Unit #1 HRSG, as well as continuing the demolition of the concrete structures of both Units #1 and #2

Throughout the month, additional work involved sorting and processing of steel and debris for off-site removal, with approximately 6,500 tons of material being loaded into trucks and then hauled off-site in the month of September.

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 JULY 2020

STATUS OF DIESEL FUELED EQUIPMENT AUTHORIZED AT SITE

A. MOBILE OFF-ROAD EQUIPMENT

THE		ON-SITE	?
EQUIPMENT TAG	MAKE & MODEL	AT START	AT END
		OF MONTH	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	YES	YES
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-A	250 LINKBELT	NO	NO
ME-1-11-A	750 LINKBELT	YES	YES
ME-1-12-A	R924 LIEBHERR	NO	NO
ME-1-13-A	250 LINKBELT	YES	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	NO	NO
ME-6-02-C	GROVE 250	NO	NO
FORKLIFTS			
ME-7-01-E	12 K GRADEALL	YES	YES

A. MOBILE OFF-ROAD EQUIPMENT (CONTINUED)

CAT 973D

		ON-SI	TE?
EQUIPMENT TAG	MAKE & MODEL	AT START	AT END
		OF MONTH	OF MONTH
BOOM LIFTS			
ME-8-01-E	JLG 600S	NO	NO
ME-8-02-E	SKYJACK SJ63AJ	NO	NO
ME-8-03-E	GENIE	NO	NO
ME-8-04-E	SKYJACK SJ86T	NO	NO
ME-8-05-E	GENIE S-85	NO	NO
ME-8-06-E	GENIE S-125	NO	NO
ME-8-07-E	GENIE S-85	NO	NO
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	NO
ME-8-11-E	JLG 1350SJP	YES	NO
AERIAL LIFTS			
ME-9-01-E	JLG 600 AJ	NO	NO

B. PORTABLE EQUIPMENT

TRACKED LOADERS

ME-10-01-C

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

YES

YES

ATTACHMENT 2 SEPTEMBER, 2020

ULTRA LOW SULFUR DIESEL FUEL EXAMPLE INVOICES

	SUPPLIER	DATE	BILL OF LADING NUMBER	AMOUNT
2-A	Dion and Sons, Inc.	9/01/20	K472449	545.5 GALLON
2-A	Dion and Sons, Inc.	9/15/20	K476476	429.5 GALLON
2-A	Dion and Sons, Inc.	9/30/20	K481481	701.4 GALLON

ATTACHMENT 2-A SEPTEMBER 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

DION AND SONS, INC. 9/1/2020 K472449 545.5 GALLON



FUELS

♦ LUBRICANTS

♦ SOLVENTS

♦ CARDLOCK
♦ INDUSTRIAL SERVICES

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K472449 9/01/2020

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DION AND SONS START 09/01/20 04:18:24 FINISH 09/01/20 05:24:40 START COUNT

END GROSS COUNT

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545.5 GALLONS

TETTILIATI BISTILLAT1 SALE NUMBER 22174 46114346 METER NUMBER UNIT ID TRUCK 330 * MULTIPLE BELIVERIES AT ONE SITE * Dian & 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 : 09/01/2020 Ticket #: 330-22174 Client #: 89007 P.O. H : k472449 S.O. ₩ : k472449 Driver : Samuelson Brian was now and great after the first over any and was present that has now any one of the first over the first ove EXEMPT VEHICLES/TANKS: FUEL TYPE: RED VehID Description Gallons 96791 1200 0.0 96795 750 111.8 96793 870 277.4 Total Gallons: 389.2 NON-EXEMPT VEHICLES/TANKS: FUEL TYPE: RED VehID Description Gallons 10411577 3.7 102247 102248 18422w1 7.4 102234 845 42.3 102636 973d 102.9 Total Gallons: Client Total Gallons 545.5 MTR ID Beg End TOTAL

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ATTACHMENT 2-B SEPTEMBER 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

DION AND SONS, INC.

9/15/2020

K476476

429.5 GALLON



QUALITY & INTEGRITY & SERVICE **SINCE 1930**

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ATTACHMENT 2-C SEPTEMBER 2020

ULTRA LOW SULFUR DIESEL FUEL INVOICE

DION AND SONS, INC.

9/30/2020

K481481

701.4 GALLON



♦ FUELS

- **LUBRICANTS**
- **SOLVENTS**
- **♦** CARDLOCK

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♦ INDUSTRIAL SERVICES

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* MULTIPLE DELIVERIES AT ONE SITE *

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Bion & Sons, Inc. Sawyer Petroleum. Phone: (562)432-3946 1543 W. 16th Street Lone Beach, CA 90813

MENTFEE PO20005 26226 ANTELOPE RD

SUN CITY, CA 92585 Date : 09/30/2020

Ticket #: 298-12775

Client #: 89007

P.O. # : k481481 S.O. # : k481481

Driver : Samuelson Brian

EXEMPT VEHICLES/TANKS:

FUEL TYPE: RED

VehIII	Description	Gallons
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102467	85	0.0
96793	87	204.4
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VehID	Description	Gallons
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102234	845	48.1
102246	858	187.6
102636	973d	49.5
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Client Total Gallons 701.4

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Attachment B Monthly Biological Survey Report September 2020



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

MEMORANDUM FOR THE RECORD

2.6 1104-015.M08

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 – September 2020

FIGURES: 1. Regional Vicinity Map

2. Demolition Progress

ATTACHMENTS: 1. 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 September 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 site check conducted September 22, 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.

August 31, 2020 signaled the close of nesting bird season and therefore weekly site checks are no longer required. Only monthly site checks will be required for the remainder of Project activities.

The monthly site check was performed by the Sapphos Environmental, Inc. DB (Ms. Paulette Loubet). During the site check, the DB verified that no active bird nests were present and ensured that no factors associated with demolition could impact any other biological resources.

As of September 22, 2020, only a small portion of Units 1 and 2 still remain standing and all other structures have been demolished. Within the next two weeks, scheduled construction activities include final removal of above-grade structures associated with Unit 1 and Unit 2. After all structures are demolished, crews will start removal of subsurface concrete pads, sumps, piping, and structure (outside the power block footprint) within 12 feet of grade. At the very end of the project, the cooling tower wall will be removed.

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 September 2020. This MFR includes reporting of marked sensitive biological resource areas established for avoidance, and summarizes the findings of the Site Check data form. Activities for the month of September 2020 include one site check.

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 accommodated the power generation facility, switchyard, 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. At this stage in the project, most major structures and components have been demolished or removed (Figure 2, Demolition Progress).

METHODS

This section describes the methods undertaken by Sapphos Environmental, Inc. biologists during a monthly site check. In compliance with the BRMIMP, once a Pre-Demolition Survey has been completed and a work area established, monitoring can be reduced to a monthly site check outside of nesting season (September–January). As the whole site has remained active, no Pre-Demolition Surveys were conducted in the month of September.

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

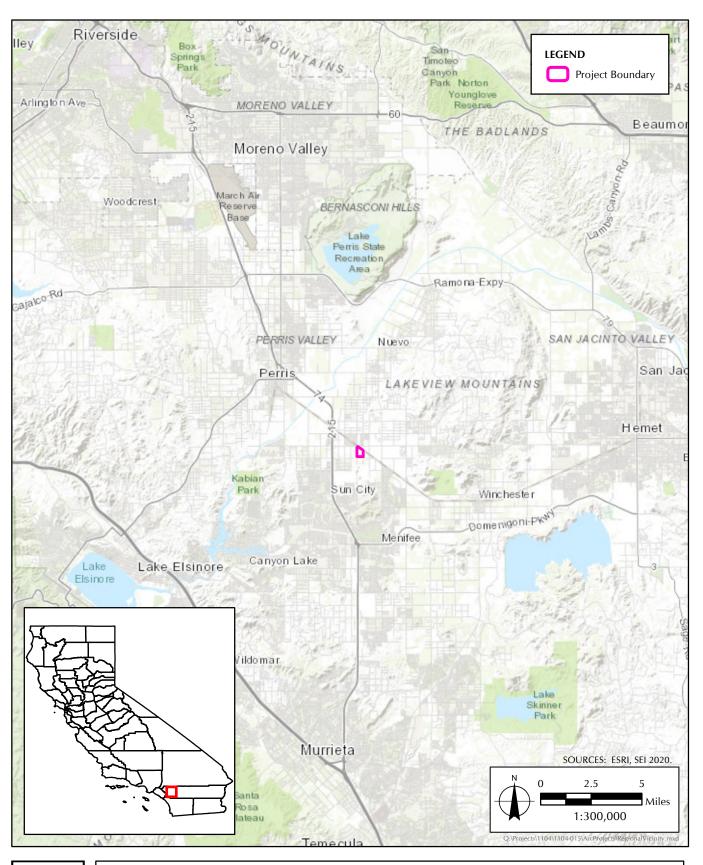




FIGURE 1 Regional Vicinity Map

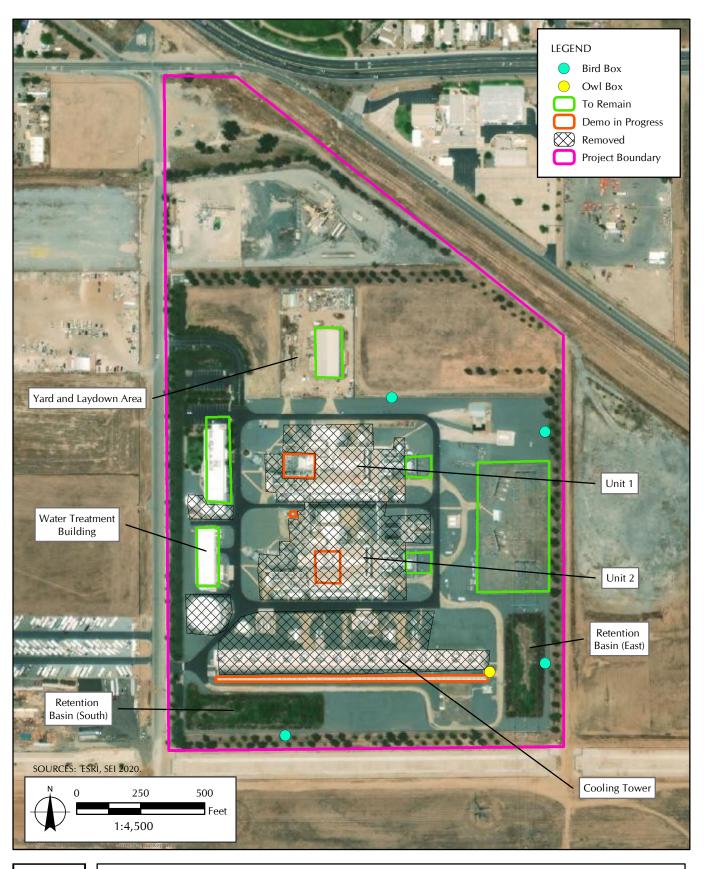




FIGURE 2 Demolition Progress

Monitoring outside of nesting bird season will only be conducted as needed by the DB to ensure the Project maintains compliance. As no active bird nests or avoidance buffers for biological resources are present on-site, full-time monitoring was not required.

Site checks consist of a pedestrian search by the DB to ensure that no factors associated with demolition could impact biological resources. Observations were recorded and a Survey Report Form was generated for the site check and (Attachment 1, *Pre-Demolition Biological Survey Form*).

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 and avoiding impacts to biological resources. 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 June there are no active nests or nest buffers on site. No new active nests were observed and no impact avoidance measures were established. Bird observations has greatly decreased throughout the site, likely as a result of the amount equipment in use and heavy demolition activities occurring. No issues or non-compliance were noted during the monthly site check.

Areas and Activities Monitored

Attachment 1 includes observations and photographs taken during the September site check. 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 and all inaccessible areas were viewed with binoculars. Figure 2 includes areas surveyed and which structures still remain on site as of September 22, 2020.

CONCLUSIONS

During the September site check, the DB verified that no bird nests were present within currently active work areas, and that demolition activities are to continue to remain in compliance in relation to biological resources. No Incident & Wildlife Observation Report forms were completed for the month of September.

Demolition activities scheduled for the month of October include final removal of above-grade structures and the beginning of removal of subsurface structures, foundations, and equipment.

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.



Inland Empire Energy Center Project Pre-Construction Biological Survey Form

Date: Sep 22, 2020	Observer: Paulette Loubet Designated Biologist (DB)	Start Time: 07:10 End Time: 08:00	Page 1 of 7
Visibility (circle one): Go	ood		
Precipitation (circle one):	None		

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

0710 DB arrived on site and checked in with ATC team.

Several different excavators working on Unit 1 and 2. Three working to demo the last part of Unit 2 as well as sorting and placing material into trucks to be hauled off. One crew working to crack concrete on 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 a few pigeons and starlings observed within work areas. No other concerns related to biological resources were observed.

0800 DB checked out with ATC and Silverado teams.

0810 DB left the site.

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

Species Observed (attach additional sheet if necessary):

Animals
Pigeon, starling, Anna's hummingbird, bushtit

Site Information

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 1, facing southeast.



Remaining portion of Unit 2, facing southeast.



Unit 1, courtyard and Unit 2, facing northeast.



Southwest retention basin, facing west.



Eastern Retention basin and cooling tower wall, facing north.



Cooling tower area, looking west.



East side of Unit 2, looking west.



Courtyard area, looking west.



Unit 1, looking west.



North side of Unit 1, looking southwest.



CERTIFICATE OF COMPLETION

Inland Empire Energy Center, LLC (IEEC)
Environmental Training Program Sign-in Sheet Date: A A MUL Instructor(s) Paule He LOUDet Inland Empire Energy Center, LLC (IEEC)

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.

and that I will be held personally liable for any violations of the endangered species and cultural resource laws. I understand that it is illegal to disturb or destroy special-status plant and animal species or cultural resources, • *

i understand that I am required to display the Environmental Training Pregram 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.

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