

<b>DOCKETED</b>	
<b>Docket Number:</b>	07-AFC-06C
<b>Project Title:</b>	Carlsbad Energy Center - Compliance
<b>TN #:</b>	240201
<b>Document Title:</b>	MONTHLY COMPLIANCE REPORT- SEPTEMBER 2021
<b>Description:</b>	ENCINA POWER STATION DEMOLITION/CARLSBAD ENERGY CENTER PROJECT MONTHLY COMPLIANCE REPORT- SEPTEMBER 2021
<b>Filer:</b>	Anwar Ali
<b>Organization:</b>	Carlsbad Energy Center LLC
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	11/1/2021 4:12:17 PM
<b>Docketed Date:</b>	11/1/2021



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October 13, 2021

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

RE: AMENDED CARLSBAD ENERGY CENTER PROJECT, DOCKET NO. 07-AFC-06C, DEMOLITION OF ENCINA POWER STATION  
CONDITION OF CERTIFICATION, COM-6  
SEPTEMBER 2021, MONTHLY COMPLIANCE REPORT

Dear Dr. Ali:

Cabrillo Power I, LLC ("Project Owner") submits the September 2021 Monthly Compliance Report (MCR) in compliance with the AFC Docket No. 07-AFC-06C, Conditions of Certification (COCs) COM-6 for the Amended Carlsbad Energy Center Project (ACECP) located at 4600 Carlsbad Boulevard, Carlsbad, California.

During the month of September 2021, demolition activities included the following: interior asbestos abatement, removal of numerous facility structures and equipment within the powerblock building, and torch cutting of equipment (structural components piping, etc.).

Completion of demolition activities is targeted for April 2022 per the revised project schedule.

If you have any questions or comments, please do not hesitate to contact me at (760) 707-6833.

Sincerely,

A handwritten signature in black ink, appearing to read "George L. Plantka". The signature is written in a cursive, flowing style.

George L. Plantka, PE  
Sr. Director, Regulatory Environmental Services  
NRG Energy, Inc.

Attached: Amended Carlsbad Energy Center Project (07-AFC-06C), California Energy Commission, Monthly Compliance Report, September 2021

cc: File



Amended Carlsbad  
Energy Center Project  
Encina Power Station  
Demolition  
(07-AFC-06C)  
California Energy Commission  
Monthly Compliance Report  
COM-6

September 2021

*Submitted by: Cabrillo Power I LLC*  
*Date Submitted: 10-13-2021*

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Attachment B:	COMPLIANCE-6: Project Schedule, September 2021
Attachment C	AQ-SC3: Air Quality Construction Compliance Summary, September 2021
Attachment D:	BIO-6: Phase II Biological Resources Monthly Compliance Report
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Attachment M	GEN-3: Proof of DCBO Payment
Attachment N	CIVIL-1, GEN-6, MECH-1: DCBO Plan Approvals and Mechanical Inspections
Attachment O	WORKER SAFETY-3: Construction Safety Supervisor Monthly Report
Attachment P	WORKER SAFETY-4: CBO Safety Monitor Inspection Monthly Report
Attachment Q	CIVIL-3 and STRUC-2: Non-Conformance Report Log

## I. Summary

This Monthly Compliance Report (MCR) focuses on Phase IV of the Amended Carlsbad Energy Center Project (i.e., demolition of Encina Power Station) as Phases I-III - pre-construction and construction/operations phases of ACECP and decommissioning of Encina Power Station - have been completed. MCRs documenting those phases of work can be found in Compliance Proceedings for the Carlsbad Energy Center Project (docket number 07-AFC-06C).

### a. Demolition Status

Phase III (decommissioning) activities began December 11, 2018 with the retirement of the Encina Power Station; decommissioning was completed by Cabrillo Power I LLC (owner of Encina Power Station) in December 2019. The Project Owner completed all compliance activities and COC submittals necessary to achieve Phase IV, Start of Demolition, in December 2019. Demolition preparation was conducted December 2019 through January 2020; abatement and demolition began on January 29, 2020.

Due to the COVID-19 pandemic and the California State of Emergency, demolition activities were suspended from March 20, 2020 until July 5, 2020. Demolition-related equipment and materials were placed in a safe-condition and storm water best management practices were confirmed by on-site personnel during the suspension of demolition activities.

Demolition activities recommenced during the week of July 6-10, 2020 with limited remobilization during which staff were re-orientated to the site and the scope of work, and safety trained.

Full-scale demolition activities during September 2021 included the following: interior asbestos abatement, removal of numerous facility structures and equipment within the powerblock building, and torch cutting of equipment (structural components, piping, etc.).

b. Revised/Updated Schedule

Per COC COM-5, the Compliance Matrix and COC deliverables are provided in Attachment A. Attachment B provides a schedule of project milestones for demolition, remediation, and construction.

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

Neither significant permitting activities pertaining to Phase IV nor **changes to schedule have occurred since the CEC's approval of ACECP in 2015.** The City of Carlsbad approved a 9-month extension to Phase IV via a City Resolution in December 2019. While we anticipate completing Phase IV by second quarter of 2022, the extension allows completion by third quarter of 2022.

The updated project schedule is provided in Attachment B.

II. List of documents submitted to meet specific conditions

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

- m. WASTE-5: Demolition Waste Management Plan
- n. WORKER SAFETY-1: Demolition Safety and Health Program
- o. WORKER SAFETY-3: Construction Safety Supervisor monthly report
- p. WORKER SAFETY-4: CBO Safety Monitor monthly report
- q. WASTE-6: Asbestos Notification Form to San Diego Air Pollution Control District - Email dated 6/29/2020 (5<sup>th</sup> Revision Notice)

### III. Updated Compliance Matrices

The Compliance Matrix updated to reflect the ACECP is included in Attachment A.

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

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

Biological Resources: BIO-5, BIO-6, BIO-7, and BIO-8 – Biological Resources Compliance inspections and report. See Attachment D.

NOISE-2/COM-11: Noise hotline log and complaint resolution process. See Attachment G.

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

WORKER SAFETY-4: CBO Safety Monitor Inspection Monthly Report. See Attachment P.

COM-13: Incident Reporting Requirements. See Attachment R.

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

None

### VI. Cumulative list of approved changes to conditions of certification

The California Energy Commission approved changes to the COCs on August 3, 2015. An updated compliance matrix with amended COCs for demolition is provided in Attachment A.

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

None

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

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

- a. AQ-SC1: Air Quality Construction Mitigation Manager (AQCMM) will implement the monitoring and reporting requirements of AQ-SC2, AQ-SC3, AQ-SC4, and AQ-SC5.
- b. BIO-5: Worker Environmental Awareness Plan training (*if required*)
- c. BIO-6: Monitoring and reporting as required per the BRMIMP.
- d. COM-6: Submit Monthly Compliance Reports.
- e. SOIL&WATER-2: Water usage summary.
- f. TRANS-5: Inspection reports on roadway conditions. (*if required*)
- g. TRANS-6: Provide summary of overweight or oversized vehicle permits as needed. (*if required*)
- h. TRANS-8: Provide a summary of encroachment permits obtained or utilized during the reporting month. (*if required*)
- i. WASTE-1: Submit correspondence with San Diego County Department of Environmental Health as needed.
- j. WORKER SAFETY-5: As needed worker training on Automated External Defibrillator (AED) locations.
- k. COM-11: Complaints requiring notifications and reporting will be submitted to CPM
- l. COM-13: Incidents requiring notifications and reporting will be submitted to CPM

IX. Additions to on-site compliance file

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

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

No violations, official warnings, or citations related to the demolition of the Encina Power Station were received in September 2021. A summary table of calls and complaints logged and responded to are included, as applicable, in Attachment G.

ATTACHMENT A

COMPLIANCE-5 AND COMPLIANCE-6  
KEY EVENTS AND COMPLIANCE MATRIX  
SEPTEMBER 2021



CEC CONDITIONS OF CERTIFICATION

TECHINAL NAME	COC Number	Subtask	Condition Type	Deliverable Req.	Description	Comments	Date Submitted	Dated Approved by CEC
AQ-SC	1		Air Quality Manager	Y	Air Quality Construction/Demolition Mitigation Manager (AQCMM): The project owner shall designate and retain an on-site AQCMM who shall be responsible for directing and documenting compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5 for the entire project site and linear facility construction/demolition. The on-site AQCMM may delegate responsibilities to one or more AQCMM Delegates. The AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and linear facilities and shall have the authority to stop any or all construction/demolition activities as warranted by applicable construction/demolition mitigation conditions. The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition. The AQCMM shall not be terminated without written consent of the Compliance Project Manager (CPM).		8/26/2019	9/20/2019
AQ-SC	2		Air Quality Plan	Y	Air Quality Construction/Demolition Mitigation Plan (AQCMP): The project owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5.	Submitted to CEC on 10/16/19. Resubmitted with updates per CEC request 12/28/19. Docketed by CEC on 1/2/2020	10/16/2019, resubmitted 12/28/19	1/2/2020
AQ-SC	3	a	Air Quality Plan	Y	Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the project site and linear facility routes. Any deviation from the following mitigation measures shall require prior CPM notification and approval. A. All unpaved roads and disturbed areas in the project and laydown construction/demolition sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering may be reduced or eliminated during periods of precipitation. B. No vehicle shall exceed 10 miles per hour on unpaved areas within the project and laydown construction/demolition sites. C. The construction/demolition site entrances shall be posted with visible speed limit signs. D. All construction/demolition equipment vehicle tires shall be inspected and washed as necessary to be cleaned and free of dirt prior to entering paved roadways. E. Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station. F. All unpaved exits from the construction/demolition site shall be graveled or treated to prevent track-out to public roadways. G. All construction/demolition vehicles shall enter the construction/demolition site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM. H. Construction/demolition areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent runoff to roadways. I. All paved roads within the construction/demolition site shall be swept at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs to prevent the accumulation of dirt and debris. J. At least the first 500 feet of any public roadway exiting the construction/demolition site shall be swept visually clean, using wet sweepers or air filtered dry vacuum sweepers, at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs or on any other day when dirt or runoff from the construction/demolition site is visible on the public roadways.	included with AQ-SC2		
AQ-SC	3	b	Air Quality Plan		K. All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered or shall be treated with appropriate dust suppressant compounds. L. All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause visible emissions shall be provided with a cover or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard. M. Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction/demolition areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation. N. Disturbed areas will be re-vegetated as soon as practical. O. Haul trucks used during the Encina Power Station demolition shall be limited to traveling on paved or graveled surfaces at all times within the boundary of the Encina Power Station property. The fugitive dust requirements listed in this condition may be replaced with as stringent or more stringent methods as required by SDAPCD Rule 55.	included with AQ-SC2		
AQ-SC	4	a	Air Quality Plan	N	Dust Plume Response Requirement: The AQCMM or Delegate shall monitor all construction/demolition activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported: (1) off the project site, -(2) 200 feet beyond the centerline of the construction of linear facilities, (3) within 100 feet upwind of any regularly occupied structures not owned by the project owner, or (4) within 50 feet upwind of the I-5 freeway indicate that existing mitigation measures are not resulting in effective mitigation. The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes, other than those occurring upwind of the I-5 Freeway, are observed: Step 1: The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination. Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression if Step 1 specified above fails to result in adequate mitigation within 30 minutes of the original determination. Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shut-down source. The owner/operator may appeal to the CPM any directive from the AQCMM or Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.	included with AQ-SC2		

CEC CONDITIONS OF CERTIFICATION

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

**CEC CONDITIONS OF CERTIFICATION**

<b>GEN</b>	<b>1</b>	<b>c</b>	<b>CBO</b>	<b>N</b>	<p>The project owner shall design, construct, and inspect the project in accordance with the 2013 California Building Standards Code (CBSC), also known as Title 24, California Code of Regulations, which encompasses the California Building Code (CBC), California Administrative Code, California Electrical Code, California Mechanical Code, California Plumbing Code, California Energy Code, California Fire Code, California Code for Building Conservation, California Reference Standards Code, and all other applicable engineering laws, ordinances, regulations and standards (LORS) in effect at the time initial design plans are submitted to the chief building official (CBO) for review and approval (the CBSC in effect is the edition that has been adopted by the California Building Standards Commission and published at least 180 days previously). The project owner shall ensure that all the provisions of the above applicable codes are enforced during the construction, addition, alteration, moving, demolition, repair, or maintenance of the completed facility, including the demolition of above-ground fuel oil storage tanks 1, 2, and 4 (ASTs 1, 2, and 4), and the demolition of the Encina Power Station (EPS) (2013 CBC, Appendix Chapter 1, §1.1.3, Scope). All transmission facilities (lines, switchyards, switching stations and substations) are covered in the conditions of certification in the Transmission System Engineering section of this document.</p> <p>In the event that the initial engineering designs are submitted to the CBO when the successor to the 2013 CBSC is in effect, the 2013 CBSC provisions shall be replaced with the applicable successor provisions. Where, in any specific case, different sections of the code specify different materials, methods of construction or other requirements, the most restrictive shall govern. Where there is a conflict between a general requirement and a specific requirement, the specific requirement shall govern.</p> <p>The project owner shall ensure that all contracts with contractors, subcontractors, and suppliers clearly specify that all work performed and materials supplied comply with the codes listed above.</p>	<b>Comments Received from CBO on Execution Plan on 12/4/19 Comments returned to CBO on 1-9-20. CBO approved on 1/22/2020</b>	<b>01/09/2020</b>	<b>1/22/2020</b>
<b>HAZ</b>	<b>7</b>		<b>Security Plan</b>	<b>Y</b>	<p>Prior to commencing tank demolition, a site-specific Demolition and Construction Site Security Plan for the tank demolition and construction phases shall be prepared and made available to the CPM for review and approval. The Construction Security Plan shall include the following:</p> <ol style="list-style-type: none"> <li>1. perimeter security consisting of fencing enclosing the demolition and construction areas;</li> <li>2. security guards;</li> <li>3. site access control consisting of a check-in procedure or tag system for demolition and construction personnel and visitors;</li> <li>4. written standard procedures for employees, contractors, and vendors when encountering suspicious objects or packages on-site or off-site;</li> <li>5. protocol for contacting law enforcement and the CPM in the event of suspicious activity or emergency; and</li> <li>6. evacuation procedures.</li> </ol>	<b>Submitted to CEC</b>	<b>11/6/2019</b>	<b>11/19/2019</b>
<b>NOISE</b>	<b>1</b>		<b>Notice</b>	<b>Y</b>	<p><b>At least 15 days prior to the start of any demolition activities associated with the amended CECP, the project owner shall notify the city of Carlsbad and all residents within one-half mile of the site, by mail or other effective means, of the commencement of project demolition and construction. At the same time, the project owner shall establish a telephone number for use by the public to report any undesirable noise conditions associated with the demolition, construction, and operation of the amended CECP and include that telephone number in the above notice. If the telephone is not staffed 24 hours per day, the project owner shall include an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. This telephone number shall be posted at the project site during construction in a manner visible to passersby. This telephone number shall be maintained until the project has been operational for at least one year, and all subsequent demolition activities at the Encina Power Station have been completed.</b></p>	Noise Notification has been completed and mailers sent out to public/residents within one mile on 9/23. Notice sent to CEC on 9/25/19	<b>9/25/2019</b>	<b>12/18/2019</b>
<b>NOISE COMPLIANCE</b>	<b>1 11</b>		<b>Hot Line Response</b>	<b>Y</b>	<p>Throughout the demolition of above-ground fuel oil storage tanks 1, 2, 4, 5, 6, and 7 (ASTs 1, 2, 4, 5, 6, and 7), construction and operation of the amended CECP, and demolition of the Encina Power Station the project owner shall document, investigate, evaluate, and attempt to resolve all project-related noise complaints. The project owner or authorized agent shall:</p> <ul style="list-style-type: none"> <li>• Use the Noise Complaint Resolution Form (below), or a functionally equivalent procedure acceptable to the CPM, to document and respond to each noise complaint;</li> <li>• Attempt to contact the person(s) making the noise complaint within 24 hours (within 12 hours if the complaint is related to nighttime concrete pour);</li> <li>• Conduct an investigation to determine the source of noise related to the complaint;</li> <li>• Take all feasible measures to reduce the noise at its source if the noise is project related; and</li> <li>• Submit a report documenting the complaint and the actions taken. The report shall include: a complaint summary, including final results of noise reduction efforts and, if obtainable, a signed statement by the complainant stating that the noise problem is resolved to the complainant's satisfaction.</li> </ul>	<b>Hot Line Established</b>	<b>8/13/2019</b>	<b>10/2/2019</b>
<b>NOISE</b>	<b>3</b>		<b>Letter</b>	<b>Y</b>	<p><b>The project owner shall submit to the CPM for review and approval a noise control program and a statement, signed by the project owner's project manager, verifying that the noise control program will be implemented throughout the demolition of ASTs 5, 6, and 7, and construction and demolition activities associated with of the amended CECP. The noise control program shall be used to reduce employee exposure to high noise levels during demolition and construction in accordance with Title 8, California Code of Regulations, sections 5095-5099, and Title 29, Code of Federal Regulations, section 1910.95</b></p>	<b>Prepared, submitted to CEC, and approved on 10/2/19</b>	<b>8/26/2019</b>	<b>10/3/2019</b>

**CEC CONDITIONS OF CERTIFICATION**

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

**CEC CONDITIONS OF CERTIFICATION**

SOIL&WATER	9	c	Permit			Permit(s) provided when obtained from SDRWQCB		
SOIL&WATER	9	d	Reporting			As needed		
TRANS	1		Permit	Y	The project owner shall consult with the City of Carlsbad and prepare and submit to the city of Carlsbad for review and comment and the Compliance Project Manager (CPM) for approval a construction/demolition traffic control plan. The plan shall be implemented during all phases of construction/demolition and shall addresses the following issues: <ul style="list-style-type: none"> <li>• timing of truck trips, including heavy equipment and building materials deliveries, especially those that would cross the railroad tracks;</li> <li>• redirecting construction and demolition traffic with a flag person at a minimum for trucks traveling eastbound on Cannon Road from the SDG&amp;E Service Gate to cross the railroad tracks;</li> <li>• signing, lighting, and traffic control device placement if required;</li> <li>• need for construction work hours and arrival/departure times outside and during peak traffic periods;</li> <li>• insurance of access for emergency vehicles to the project site;</li> <li>• temporary closure of travel lanes;</li> <li>• access to adjacent residential and commercial property during the construction of all pipelines;</li> <li>• specification of construction-related haul routes; and</li> <li>• identify safety procedures for exiting and entering the site access gate.</li> </ul>	A temporary Traffic Control Plan (TCP) was approved by the City of Carlsbad Traffic Control Department and the CEC to allow for the City of Carlsbad's Jack-and-bore project. Due to the left turn from Gate 3 being obstructed, the temporary TCP allows for a right turn while egressing from Gate 3, and requires all truck traffic to turn left on Carlsbad Boulevard to gain acces to Interstate 5 on Palomar Airport Road. All other craft traffic can take either a left or right on Carlsbad Boulevard	10/29/2019, Modified Plan sent 11/14/19; Temporary Traffic Control Plan approved on 11/9/2020	12/12/2019
TRANS	5	a	Reporting	Y	During and following completion of project construction and demolition, the project owner shall repair any damage to roadways affected by construction/demolition activity to pre-project road conditions or better. Restoration of significant damage which could cause hazards (such as potholes, deterioration of pavement edges, or damaged signage) shall take place immediately after the damage has occurred. Prior to the start of demolition and construction, the project owner shall photograph or videotape, all roadways that will be affected by pipeline construction and heavy truck traffic. The project owner shall provide the CPM and the city of Carlsbad with a copy of the images for the roadway segments under its jurisdiction. Also, prior to start of demolition and construction, the project owner shall notify the city about the schedule for project demolition/construction. The purpose of this notification is to allow the city the opportunity to postpone any planned roadway resurfacing and/or improvement projects until after the project demolition/construction has taken place and to coordinate demolition/construction-related activities associated with other projects.		9/16/2019	9/30/2019
TRANS	7		Plan	Y	During project construction/demolition, the project owner shall implement a parking and staging plan for project construction and demolition to enforce a policy that all project-related parking occurs on site or in designated off-site parking areas.		10/16/2019	10/22/2019
WASTE	5	a	Plan		The project owner shall prepare a Demolition and Construction Waste Management Plan for all wastes generated during demolition and construction of the facility and shall submit the plan to the CPM for review and approval. The plan may be submitted in two sections: Demolition activities and Construction activities. Both sections of the plan shall contain, at a minimum, the following: <ul style="list-style-type: none"> <li>• a description of all demolition and construction waste streams, including projections of frequency, amounts generated, and hazard classifications; and</li> <li>• management methods to be used for each waste stream, including temporary on-site storage, housekeeping and best management practices to be employed, treatment methods and companies providing treatment services, waste testing methods to assure correct classification, methods of transportation, disposal requirements and sites, and recycling and waste minimization/source reduction plans.</li> <li>• a reuse/recycling Debris Management Plan for demolition and construction materials that meets or exceeds the waste diversion goals established by the Integrated Waste Management Compliance Act (Pub. Resources Code, § 41780 et seq.) and CAL Green Title 24, California Code of Regulations, Part 11sections 4.408, 5.408, 301.1.1 and 301.3.</li> </ul>		10/16/2019	11/12/2019
WASTE	6		Permit	Y	Prior to demolition of existing structures, the project owner shall complete and submit a copy of a San Diego County Air Pollution Control District (District) Asbestos Renovation and Demolition Notification Form to the CPM and the District for review. The project owner shall remove all asbestos-containing material (ACM) from the site prior to demolition.	Final (4th) Revised Asbestos Notification Form was submitted to San Diego Air Pollution Control District and CPM for January 29, 2020 Start of Demolition of Asbestos Abatement.	1/10/2020 1/17/2020 1/21/2020 1/24/2020	1/29/2020



CEC CONDITIONS OF CERTIFICATION

VIS	3	B	Screening		<p>If necessary to provide visual screening of staging activities, equipment and materials in the short term, the project owner shall provide temporary dark-colored, opaque fencing to provide visual screening until landscape screening described above has achieved sufficient maturity to provide visual screening. Existing opaque fencing shall be maintained along the Carlsbad Boulevard frontage of the EPS for the duration of construction and demolition.</p> <p>The project owner shall submit to the CPM for review and approval, and simultaneously to the city of Carlsbad for review and comment, a landscaping plan whose proper implementation will satisfy these requirements. The plan shall include:</p> <p>a) A detailed landscape, grading, and irrigation plan, at a reasonable scale. The plan shall demonstrate how the requirements stated above shall be met. The plan shall provide a detailed installation schedule demonstrating installation of as much of the landscaping as early in the construction process as is feasible in coordination with project construction. The intent of the plan shall be to minimize loss of existing perimeter tree and shrub screening, particularly at the northeast laydown site; and to provide supplemental and replacement plantings as needed to screen staging sites.</p>			
WORKER SAFETY	1	b	Plan	Y	<p>The project owner shall submit to the Compliance Project Manager (CPM) a copy of the Project Demolition and Construction Safety and Health Program containing the following:</p> <p>1. a Demolition and Construction Personal Protective Equipment Program;</p> <p>2. a Demolition and Construction Exposure Monitoring Program;</p> <p>3. a Demolition and Construction Injury and Illness Prevention Program;</p> <p>4. a Demolition and Construction Emergency Action Plan; and</p> <p>5. a Demolition and Construction Fire Prevention Plan.</p> <p>6. an Encina Power Statin Demolition Plan.</p> <p>The Personal Protective Equipment Program, the Exposure Monitoring Program, and the Injury and Illness Prevention Program shall be submitted to the CPM for review and approval concerning compliance of the program with all applicable safety orders. The Demolition and Construction Emergency Action Plan, the Demolition and Construction Fire Prevention Plan, and an Encina Power Station Demolition Plan shall be submitted to the Carlsbad Fire Department for review and comment prior to submittal to the CPM for approval.</p>		11/6/2019	12/11/2019
WORKER SAFETY	3	a	Supervisor	Y	<p>The project owner shall provide a site Demolition Safety Supervisor (DSS) and a Construction Safety Supervisor (CSS) who, by way of training and/or experience, is are knowledgeable of tank demolition, power plant construction activities and relevant laws, ordinances, regulations, and standards; is are capable of identifying workplace hazards relating to the demolition and/or construction activities; and has authority to take appropriate action to assure compliance and mitigate hazards. The DSS or CSS shall:</p> <p>1. have overall authority for coordination and implementation of all occupational safety and health practices, policies, and programs;</p> <p>2. assure that the safety program for the project complies with Cal/OSHA and federal regulations related to power plant projects;</p> <p>3. assure that all demolition, construction and commissioning workers and supervisors receive adequate safety training;</p> <p>4. complete accident and safety-related incident investigations and emergency response reports for injuries and inform the CPM of safety-related incidents; and</p> <p>5. assure that all the plans identified in Conditions of Certification Worker Safety-1 and -2 are implemented.</p>		10/8/2019	12/11/19 - But need to update all Federal OSHA citations with the appropriate Cal/OSHA code citations
WORKER SAFETY	4		CBO	Y	<p>The project owner shall make payments to the Chief Building Official (CBO) for the services of a Safety Monitor based upon a reasonable fee schedule to be negotiated between the project owner and the CBO. Those services shall be in addition to other work performed by the CBO. The Safety Monitor shall be selected by and report directly to the CBO and will be responsible for verifying that the Construction Safety Supervisor, as required in Condition of Certification Worker Safety-3, implements all appropriate Cal/OSHA and Energy Commission safety requirements. The Safety Monitor shall conduct on-site (including linear facilities) safety inspections at intervals necessary to fulfill those responsibilities and shall do this during the period of tank demolition/removal, construction of the CECP, and demolition/removal of the EPS.</p>		9/12/2019	10/10/2019

CEC CONDITIONS OF CERTIFICATION

WORKER SAFETY	5		Training	Y	The project owner shall ensure that a portable automatic external defibrillator (AED) is located on site during tank demolition, construction and operations and demolition/removal of the EPS and shall implement a program to ensure that workers are properly trained in its use and that the equipment is properly maintained and functioning at all times. During demolition of the tanks and the EPS, construction and commissioning, the following persons shall be trained in its use and shall be on site whenever the workers that they supervise are on site: the Demolition or Construction Project Manager or delegate, the Demolition or Construction Safety Supervisor or delegate, and all shift foremen. During operations, all power plant employees shall be trained in its use. The training program shall be submitted to the CPM for review and approval.	Training held on 12/4/19. Completed AED Training.	12/5/2019	12/10/2019
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Submitted to CEC

Approved by CEC

ATTACHMENT B

COMPLIANCE-6  
PROJECT SCHEDULE  
SEPTEMBER 2021





Data Date: 9/1/21			MA0842-U-17 - MA0842 NRG Encina Power Station - Update 17 - 2021-09-01										05. Detailed Schedule - Remaining								Page 2 of 4	
Activity ID	Activity Name	Orig Dur	Start	Late Start	Finish	Late Finish	Float															
								2021				2022										
								Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul				
PB.U4.1025	Clear Non-Structural Col.s 16-23/D-A Basement to El. 34	15	4/19/21 A	8/25/21	9/8/21	8/28/21	-9	<div></div>														
PB.U4.1050	Boiler 4 East Side Wall & Tube Mouthing	10	10/12/21	9/15/21	10/22/21	9/25/21	-23		<div></div>													
PB.U4.1060	Boiler 4 Mechanical Demo	10	10/23/21	9/27/21	11/3/21	10/7/21	-23			<div></div>												
PB.U4.1070	Structural Demo Col.'s 16-23 / F1 to D	13	11/4/21	10/8/21	11/18/21	10/22/21	-23				<div></div>											
PB.U4.1080	Demo & Clear to Basement Elevation Col.'s 16-23 / F1 to A	18	11/19/21	11/23/21	12/11/21	12/15/21	3				<div></div>	Demo & Clear to Basement Elevation Col.'s 16-23 / F1 to A										
PB.U4.1090	Hammer Turbine Base to Final Grade Elevation	8	8/12/21 A	8/30/21	9/13/21	9/2/21	-9	<div></div>														
Unit 3 - Power Block Demolition		185	4/21/21 A	9/20/21	1/22/22	3/7/22	36	1/22/22, Unit 3 - Power Block Demolition														
PB.U3.1000	Demo Turbine Structure Col.s 10-16 / D-A	10	10/9/21	10/12/21	10/20/21	10/22/21	2		<div></div>	Demo Turbine Structure Col.s 10-16 / D-A												
PB.U3.1010	Demo & Clear Turbine Basement Col.s 10-16 / D-A	15	4/21/21 A	9/20/21	10/2/21	10/5/21	2	<div></div>	Demo & Clear Turbine Basement Col.s 10-16 / D-A													
PB.U3.1040	Boiler 3 West Side Wall & Tube Mouthing	5	11/19/21	10/23/21	11/25/21	10/28/21	-23				<div></div>	Boiler 3 West Side Wall & Tube Mouthing										
PB.U3.1050	Boiler 3 Mechanical Demo	15	11/26/21	10/29/21	12/14/21	11/15/21	-23				<div></div>	Boiler 3 Mechanical Demo										
PB.U3.1060	Structural Demo Col.'s 10-16 / H-D	10	12/15/21	11/16/21	1/5/22	11/29/21	-23				<div></div>	Structural Demo Col.'s 10-16 / H-D										
PB.U3.1070	Demo & Clear to Basement Elevation Col.'s 10-16 / H-D	15	1/6/22	2/17/22	1/22/22	3/7/22	36				<div></div>	Demo & Clear to Basement Elevation Col.'s 10-16 / H-D										
PB.U3.1080	Hammer Turbine Base to Final Grade Elevation	5	10/4/21	10/6/21	10/8/21	10/11/21	2		<div></div>	Hammer Turbine Base to Final Grade Elevation												
Unit 2 - Power Block Demolition		196	4/21/21 A	10/30/21	2/23/22	3/7/22	10	2/23/22, Unit 2 - Power Block Demolition														
PB.U2.1000	Demo Turbine Structure Col.s 5-10 / D-A	10	10/21/21	11/16/21	11/1/21	11/29/21	22			<div></div>	Demo Turbine Structure Col.s 5-10 / D-A											
PB.U2.1010	Demo & Clear Turbine Basement Col.s 5-10 / D-A	15	4/21/21 A	10/30/21	10/19/21	11/15/21	23	<div></div>	Demo & Clear Turbine Basement Col.s 5-10 / D-A													
PB.U2.1040	Boiler 2 West Side Wall & Tube Mouthing	5	1/6/22	11/30/21	1/11/22	12/4/21	-23					<div></div>	Boiler 2 West Side Wall & Tube Mouthing									
PB.U2.1050	Boiler 2 Mechanical Demo	15	1/12/22	12/6/21	1/28/22	12/22/21	-23					<div></div>	Boiler 2 Mechanical Demo									
PB.U2.1060	Structural Demo Col.'s 5-10 / G-D	10	1/29/22	1/3/22	2/9/22	1/13/22	-23					<div></div>	Structural Demo Col.'s 5-10 / G-D									
PB.U2.1070	Demo & Clear to Basement Elevation Col.'s 5-10 / G-D	11	2/10/22	2/23/22	2/23/22	3/7/22	10					<div></div>	Demo & Clear to Basement Elevation Col.'s 5-10 / G-D									
PB.U2.1080	Hammer Turbine Base to Final Grade Elevation	5	10/20/21	11/30/21	10/25/21	12/4/21	33			<div></div>	Hammer Turbine Base to Final Grade Elevation											
Unit 1 - Power Block Demolition		209	4/21/21 A	12/6/21	4/2/22	3/7/22	-23	4/2/22, Unit 1 - Power Block Demolition														
PB.U1.1000	Col. H / Col.'s 1 to 14 Concrete Wall Demo	5	10/11/21	12/22/21	10/15/21	1/6/22	60			<div></div>	Col. H / Col.'s 1 to 14 Concrete Wall Demo											
PB.U1.1010	Fuel Oil Room Partial Demo	1	11/2/21	1/6/22	11/2/21	1/6/22	45				<div></div>	Fuel Oil Room Partial Demo										
PB.U1.1020	Col. 1 / Col.'s H to A Concrete Wall Demo	6	11/3/21	1/7/22	11/9/21	1/13/22	45				<div></div>	Col. 1 / Col.'s H to A Concrete Wall Demo										
PB.U1.1050	Boiler 1 West Side Wall & Tube Mouthing	5	2/10/22	1/14/22	2/15/22	1/19/22	-23					<div></div>	Boiler 1 West Side Wall & Tube Mouthing									
PB.U1.1060	Boiler 1 Mechanical Demo	8	2/16/22	1/20/22	2/25/22	1/28/22	-23					<div></div>	Boiler 1 Mechanical Demo									
PB.U1.1070	Structural Demo Col.'s 1-5 / H-D	15	2/26/22	1/29/22	3/15/22	2/15/22	-23					<div></div>	Structural Demo Col.'s 1-5 / H-D									
PB.U1.1080	Complete Fuel Oil Room Demo	1	3/16/22	2/16/22	3/16/22	2/16/22	-23						<div></div>	Complete Fuel Oil Room Demo								
PB.U1.1090	Demo & Clear to Basement Elevation Col.'s 1-5 / G-D	15	3/17/22	2/17/22	4/2/22	3/7/22	-23					<div></div>	Demo & Clear to Basement Elevation Col.'s 1-5 / G-D									
PB.U1.1100	Demo Turbine Structure Col.s 1-5 / D-A	15	11/6/21	12/17/21	11/23/21	1/13/22	33				<div></div>	Demo Turbine Structure Col.s 1-5 / D-A										
PB.U1.1110	Demo & Clear Turbine Basement Col.s 1-5 / D-A	10	4/21/21 A	12/6/21	11/5/21	12/16/21	33	<div></div>	Demo & Clear Turbine Basement Col.s 1-5 / D-A													
PB.U1.1120	Hammer Turbine Base to Final Grade Elevation	5	11/6/21	2/17/22	11/11/21	2/23/22	77				<div></div>	Hammer Turbine Base to Final Grade Elevation										
Site Demolition		46	9/1/21	1/3/22	10/23/21	3/26/22	120	10/23/21, Site Demolition														
SD.1010	South Overhead Electric Bridge Powerhouse to Control Bldg. 1/2	2	9/1/21	1/3/22	9/2/21	1/4/22	95	<div></div>	South Overhead Electric Bridge Powerhouse to Control Bldg. 1/2													
SD.1020	North Overhead Electric Bridge Powerhouse to Control Bldg. 3	2	9/3/21	1/5/22	9/4/21	1/6/22	95	<div></div>	North Overhead Electric Bridge Powerhouse to Control Bldg. 3													
Demolition of Various Out Buildings		6	9/1/21	3/21/22	9/7/21	3/26/22	160	9/7/21, Demolition of Various Out Buildings														
SD.OB.1010	Upper Storage Bldg.	2	9/1/21	3/21/22	9/2/21	3/22/22	160	<div></div>	Upper Storage Bldg.													
SD.OB.1020	Upper Warehouse	4	9/3/21	3/23/22	9/7/21	3/26/22	160	<div></div>	Upper Warehouse													
Control Houses		20	10/1/21	2/19/22	10/23/21	3/16/22	111	10/23/21, Control Houses														
SD.CH.1000	Control Bldg. 1/2 Tunnel Opening	2	10/7/21	3/15/22	10/8/21	3/16/22	124		<div></div>	Control Bldg. 1/2 Tunnel Opening												
SD.CH.1010	Control Bldg. 1/2	5	10/1/21	2/19/22	10/6/21	2/25/22	110		<div></div>	Control Bldg. 1/2												
SD.CH.1020	Control Bldg. 3	5	10/7/21	2/26/22	10/12/21	3/3/22	110		<div></div>	Control Bldg. 3												
SD.CH.1030	Control Bldg. 3 Tunnel Opening	2	10/13/21	3/15/22	10/14/21	3/16/22	119			<div></div>	Control Bldg. 3 Tunnel Opening											
SD.CH.1040	Units 1-3 GSU	10	10/13/21	3/4/22	10/23/21	3/15/22	110			<div></div>	Units 1-3 GSU											
Waste Water Treatment Area		41	9/13/21	1/29/22	10/29/21	3/18/22	108	10/29/21, Waste Water Treatment Area														
WW.1000	Electrical Disconnect	10	9/13/21	1/29/22	9/23/21	2/9/22	108	<div></div>	Electrical Disconnect													
WW.1010	Utility Verification	1	9/24/21	2/10/22	9/24/21	2/10/22	108		<div></div>	Utility Verification												
WW.1020	Piping Segregation from EW Tank Piping	2	9/25/21	2/11/22	9/27/21	2/12/22	108	<div></div>	Piping Segregation from EW Tank Piping													
WW.1030	TW & LVW Tank Piping Removal	2	9/28/21	2/14/22	9/29/21	2/15/22	108	<div></div>	TW & LVW Tank Piping Removal													
WW.1040	Obsolete Piping Removal WWT to Powerhouse	4	9/30/21	2/16/22	10/4/21	2/19/22	108	<div></div>	Obsolete Piping Removal WWT to Powerhouse													
WW.1050	LVW Tank 2 Demo	4	10/14/21	3/3/22	10/18/21	3/7/22	108		<div></div>	LVW Tank 2 Demo												



ATTACHMENT C

AQ-SC3  
AIR QUALITY CONSTRUCTION  
COMPLIANCE SUMMARY  
SEPTEMBER 2021



## Air Quality Construction Compliance Summary

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

PREPARED FOR: Carlsbad Power I, LLC for the licensed  
Carlsbad Energy Center Project

PREPARED BY: Timothy Sisk (Alternate AQCM), NRG Energy, Inc.

DATE: October 13, 2021

COMPLIANCE PERIOD: September 2021

This compliance memorandum summarizes the activities conducted in June 2021 to demonstrate compliance with the approved *Air Quality Construction Mitigation Plan (AQCMP) for Phase IV of the Amended Carlsbad Energy Center Project (Amended CEC)* (CEC, 2019). The Amended CEC Phase IV AQCMP covers the aboveground demolition/removal of Encina Power Station. Below grade demolition and site remediation, which would be accomplished under the authority of San Diego County Environmental Health Department (site remediation) and the City of Carlsbad (redevelopment of the site for future use), are beyond the scope of Phase IV of the Amended CEC.

Mobilization for Phase IV of the project started during the first week of November 2019. Limited demolition and asbestos abatement began on January 29, 2020.

Due to the COVID-19 pandemic and the California State of Emergency, demolition activities were suspended on March 20, 2020. Demolition activities recommenced during the week of July 6-10, 2020 with limited remobilization during which staff were re-orientated to the site and the scope of work, and safety trained.

The demolition contractor provided a relief request on February 14, 2021 through the Encina Power Station Air Quality Construction Mitigation Manager (AQCM) Tier 3 engine relief/variance from Condition of Certification AQ-SC5 for a specialized excavator. The modified and retrofitted Liebherr 984C-ER excavator was designed and engineered over the course of several years to specifically meet and eliminate the safety concerns encountered during the demolition of power plants. The CEC approved the relief/variance request on February 21, 2021. The Liebherr 984C-ER excavator arrived in August 2021 and is expected to be the primary demolition machine onsite.

Demolition activities during September 2021 involved interior and exterior asbestos abatement, removal of numerous facility structures and equipment within the powerblock building, removal of Unit 5, and torch cutting of metallic equipment (structural components, piping, etc.).

#### Fugitive Dust Compliance Measures

For this compliance period during Phase IV of the Encina Power Station Demolition, the following compliance measures were implemented, if they occurred, using the compliance checklist:

- Observance of a visible dust plume





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

No deviations from conditions AQ-SC3 or AQ-SC4 occurred during the compliance period. No visible dust plumes, additional control measures, nor complaints occurred during the compliance period.

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

### **Diesel Equipment Compliance Measures**

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

The following compliance measures were implemented during this compliance period:

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

Equipment onsite and used during this compliance period are being recorded and are listed in Table 1. Documentation confirming that equipment used for ten (10) days or more are Tier 4 or Tier 4i, along with the appropriate letter from the equipment owner confirming maintenance is performed as required for the equipment listed in Table 1, are included as Attachment B to this memorandum.

### **References**

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



Table 1  
**Diesel Equipment**  
*AQCMF 07-AFC-06C*

<u>Date Arrived (Removal Date)</u>	<u>CARB ID</u>	<u>S/N</u>	<u>Equipment</u>	<u>Engine Data</u>	<u>Die sel hp</u>	<u>Tier</u>	<u>Equipment Owner (Renter)</u>
11/11/2019	FP4A83	41935	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG200	92	4I	BISCO
11/11/2019	GC4A66	41936	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG2732	92	4I	BISCO
11/11/2019	YG9P77	41937	Bobcat S770	Kubota, CKBXLO3.8AKD, V3800-CR-T, 3.8L, SN: CG4188	92	4I	BISCO
01/07/2020	JN8S95	41951	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9060110LELO2	92	4	BISCO
01/07/2020	XY9V35	41952	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9060108LELO2	92	4	BISCO
02/21/2020	BT4G48	A97047	Komatsu Loader WA500-8	Komatsu, KKLXL15.2EDC SN: 834073	357	4	BISCO
03/16/2020	KP3K59	41956	Bobcat S770	Doosan, KDICLO3.4LEA, D34P, 3.4L, SN: D34P9059852LELO2	92	4	BISCO
07/24/2020	RP6M67	WLHZ- 1488KZC049084	Liebherr 926 WLC	Liebherr, KCHA27.01SQC. D34P, SN: 2018038427	268	4	BISCO
09/21/2020	FF8U93	10167	Liebherr 956 WLC	Liebherr, HLHAL12.0SQC. D946, SN: 2017 04 2818	326	4	BISCO
09/27/2020	XG3J59	10166	Liebherr 956 WLC	Liebherr, HLHAL12.0SQC. D946, SN: 2018 04 1117	326	4	BISCO



10/31/2020	DB3C39	0160104362	Skytrak	CUMMINGS, LCEXL03.8AAC. QSF3.8L, SN: 22419170	110	4	Sunbelt BISCO
04/05/2021	DG6D66	48966	Liebherr 976 WLC	Liebherr, JLHAL16.2VQC. D9508, SN: 2018 14 1636	544	4	BISCO
04/09/2021	YF7677	MKL00395	Caterpillar 973	CATERPILLAR KCPXL09.3HTF SN: SYE3625	275	4	BISCO
5/10/2021	KC8N56	Pelican Elgin Sweeper	NP41124	JD Power Systems, GJDXL04.5304, 4045TFC03A.6, SN: R5207781- R52483	74	4	BISCO
6/22/2021	LN6J68	549832	Tadano GR900XL	CUMMINS, GCEXL06.7AAK, QSB6.7; 6.7L SN: 26652539	260	4	BRAGG Crane Company BISCO
6/18/2021	FK7R36	0300193542	JLG/800AJ	Deutz, EDZXL02.9020, TD2.9L4, 2.9L, SN: 11638418	67	4	Sunbelt BISCO
6/22/2021	PK6C74	0300264114	JLG/800AJ	Deutz, KDZXL02.9020 , TD2.9L4, 2.9L, SN: 12371495	67	4	Sunbelt BISCO
07/24/2021	TB3S86	0300276145	135' Manlift	DEUTZ, LDZXL02.9106 TCD2.9L4, SN: 12534987	74	4	Sunbelt BISCO
07/30/2021	VD5E49	52247	Liebherr 956 WLC	Liebherr, LLHAL10.5SQC. D9508, SN: 2018 14 1636	364	4	BISCO
7/28/2021	YM4R89	AJZV18780	Bobcat S550	DOOSAN, HDICL02.4LEA. D24NAP, SN: 7113896LEL03	66	4	Sunbelt BISCO
7/28/2021	NW6D33	AHGM19707	Bobcat S550	DOOSAN, HDICL02.4LEA. D24NAP, SN: 7113896LEL03	75	4	Sunbelt BISCO
8/18/2021	LH9Y68	35074	Liebherr 984C ER Track Excavator	Liebherr, ACEXL019.AAD. QSK19, SN: 37245007	675	3- Retro- fitted	BISCO





Cabrillo Power I, LLC  
4600 Carlsbad Boulevard  
Carlsbad, CA 92008

9/22/2021	FX6F59	2743003	JCB 5050 Forklift	Kohler, JKHXL2.48TCR. KD12504TCR, SN: 4816601460	74	4	Sunbelt BISCO
09/24/2021	KM6P53	B4CE16254	Bobcat T76	DOOSAN, MDICL02.4LEA. DM02P, SN: DM02P1033023LEL 20	74	4	Sunbelt BISCO
10/5/2021	HG4T96	35074	Liebherr R956 Excavator	Liebherr, KLHAL10.5SQC. D936 A7-24, SN: 2019041903	364		BISCO
10/11/2021	NH9W73	0300195714	JLG/1350 135' Manlift	DEUTZ, EDZXL02.9016 TCD2.9L4, SN: 11682373	75	4	Sunbelt BISCO



Cabrillo Power I, LLC  
4600 Carlsbad Boulevard  
Carlsbad, CA 92008

## Attachment A

### **Air Quality Control Checklists**

AQCMP or designee name: Tommy Brister

Date: 9/01/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Equipment tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/01/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b> Direct more intensive	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/01/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/02/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

i. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/02/2021

Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement

Specific Location / Area:

Identify Area	200 feet beyond the centerline of the construction of linear	
Identify	within 100 feet upwind of any regularly occupied structures	
Identify distance /	50 feet upwind of I-5	

Reduce visible dust plumes to comply with CEC COC AQ-5C4 (with the exception of visible emissions within 50 feet upwind of the I-5

freeway) Area Affected / Source:	NO Truck / Dirt traffic at current time	
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Date / Time Identified:

Mitigation Measure Implemented:

Time Implemented / Notes

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
Reduce visible dust plumes to comply with CEC COC AQ-5C4 within 50 feet upwind of the I-5 freeway		
Area Affected / Source:	No truck or Dirt traffic	Date / Time Identified:
Mitigation Measure Implemented:		Time Implemented / Notes
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.		
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/02/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



AQCMP or designee name: Tommy Brister

Date: 9/08/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM/ Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM/ Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/08/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5 freeway) Area Affected / Source:</b>		
	<b>NO Truck / Dirt traffic at current time</b>	

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM/ Delegate shall direct a temporary shutdown of the activity causing the emissions.		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation.		

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/08/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/09/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/09/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5. Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>	
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/09/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



AQCMP or designee name: Tommy Brister

Date: 9/10/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Equipment Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

I. The activity shall not restart until the AQCOMM or AQCOMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCOMM or AQCOMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/10/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCOMM or AQCOMM Delegate shall direct a temporary shutdown of the activity		
causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/10/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/11/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1 The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/11/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5 freeway) Area Affected / Source:</b>		
	<b>NO Truck / Dirt traffic at current time</b>	

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is observed.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b> Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/11/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/13/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/13/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/13/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/14/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - <u>identify</u>	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
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Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map



# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/14/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
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Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/14/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged.
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/15/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - <u>identify</u>	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1 The activity shall not restart until the AQCOMM or AQCOMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCOMM or AQCOMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/15/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCOMM or AQCOMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/15/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is one file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/16/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map



# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

3. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/16/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers. <sup>1</sup>		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: Tommy Brister

Date: 9/16/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/17/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1 The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/17/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the project site: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: Tommy Brister

Date: 9/17/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/18/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented****(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/18/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/18/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



AQCMP or designee name: Tommy Brister

Date: 9/20/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/20/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is detected to driver on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/20/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMR or designee name: Tommy Brister

Date: 9/21/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project.. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCOMM or AQCOMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCOMM or AQCOMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/21/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
---	--	--

**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCOMM or AQCOMM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b> Direct more intensive	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: Tommy Brister

Date: 9/21/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/22/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/22/2021

Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement

Specific Location / Area:

Identify Area	200 feet beyond the centerline of the construction of linear	
Identify	within 100 feet upwind of any regularly occupied structures	
Identify distance /	50 feet upwind of I-5	

Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5

freeway) Area Affected / Source:	NO Truck / Dirt traffic at current time	
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Date / Time Identified:

Mitigation Measure Implemented:

Time Implemented / Notes

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is observed to drivers on I-5.		
Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway		
Area Affected / Source: Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	No truck or Dirt traffic	Date / Time Identified:
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.	Mitigation Measure Implemented:	Time Implemented / Notes
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/22/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMF or designee name: Tommy Brister

Date: 9/23/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated route of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosion control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map



# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1. The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/23/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure  
Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5.		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b>	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/23/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/24/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1 The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visible dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity; provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/24/2021

**Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement**

**Specific Location / Area:**

<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear	
<i>Identify</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance /</i>	50 feet upwind of I-5	

**Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5**

<b>freeway) Area Affected / Source:</b>	<b>NO Truck / Dirt traffic at current time</b>	
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**Date / Time Identified:**

**Mitigation Measure Implemented:**

**Time Implemented / Notes**

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 4: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is		
<b>Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway</b>		
<b>Area Affected / Source:</b> Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	<b>No truck or Dirt traffic</b>	<b>Date / Time Identified:</b>
	<b>Mitigation Measure Implemented:</b>	<b>Time Implemented / Notes</b>
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/24/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

AQCMP or designee name: Tommy Brister

Date: 9/25/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - identify	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map



# Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

1 The activity shall not restart until the AQCM or AQCM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCM or AQCM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

Date: 9/25/2021

Monitoring for Visible Dust Plumes with the potential to be transported off the projectsite: Definition of Areas Requirement

Specific Location / Area:

Identify Area	200 feet beyond the centerline of the construction of linear	
Identify	within 100 feet upwind of any regularly occupied structures	
Identify distance /	50 feet upwind of I-5	

Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5

freeway) Area Affected / Source:	NO Truck / Dirt traffic at current time	
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Date / Time Identified:

Mitigation Measure Implemented:

Time Implemented / Notes

Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCM or AQCM Delegate shall direct a temporary shutdown of the activity causing the emissions. <sup>1</sup>		
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is		
Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway		
Area Affected / Source:	No truck or Dirt traffic	Date / Time Identified:
application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.	Mitigation Measure Implemented:	Time Implemented / Notes
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. <sup>2</sup>		



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/25/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):	YES	Newly arrived equipment is tracked
Confirm all equipment are ARB tagged on both sides and tags are Visible.	Tags Visible (Y/N):	YES	All equipment coming on site is being tagged
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):	YES	
Letter from each equipment owner is on file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)	YES	
A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/27/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

		<b>Implemented (Y/N):</b>	<b>Notes:</b>
Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist	NA	No dirt traffic at current time
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map	YES	
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map	YES	No truck traffic at current time
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - <u>identify</u>	YES	Rumble plate put in place
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)	YES	Is being completed twice a day
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active	YES	No dirt traffic at current time
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard	NA	No truck traffic at current time
Storage areas inactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.	N/A	
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/27/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
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Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):	YES	Tags are visible
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Letter from each equipment owner is one file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):	YES	
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A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project,

AQCMP or designee name: Tommy Brister

Date: 9/28/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted is various areas
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving	NA	No Dirt traffic at current time
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change	YES	Gate #3 is the designated rout of entry for project. Paved road
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Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.	NA	No truck traffic at current time
Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/28/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

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A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

Date: 9/29/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily**

**Going Requirements**

**Area Affected:**

**Requirement:**

**Implemented  
(Y/N):**

**Notes:**

Construction site entrance and Travel through	Post visible speed limit signs of a maximum of 10 MPH for unpaved	YES	Signs posted in various areas
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Disturbed areas Demolition Haul Trucks -	Re-Vegetated as soon as possible Travel limited to paved or	YES	No dirt traffic at the

Within the Encina Power Station Property

graveled surfaces - Note Routes on Site Figure Map



Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/29/2021

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A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



AQCMP or designee name: Tommy Brister

Date: 9/30/2021

**Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily****Going Requirements****Area Affected:****Requirement:****Implemented  
(Y/N):****Notes:**

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Within the Encina Power Station  
Property

graveled surfaces - Note Routes on Site Figure Map

Air Quality Construction Mitigation for the Carlsbad Energy Center Project

AQCMP or designee name: Tommy Brister

AQCMP or designee signature: *Tommy Brister*

Date: 9/30/2021

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A list of all other actions taken to control diesel construction related emissions	Other Reductions:	N/A	



Cabrillo Power I, LLC  
4600 Carlsbad Boulevard  
Carlsbad, CA 92008

## **Attachment B**

# **Diesel Engine Tier and Maintenance Documentation**

# Brandenburg®

---

October 1<sup>st</sup> , 2021

Project Code: MA0842

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

Attn: Tim Sisk  
Environmental Manager

**Subject: Maintenance and Inspection of Equipment**

Dear Mr. Sisk:

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

Please let me know if any further information is required.

Best regards,

*Liam J Campbell*

Liam Campbell  
Brandenburg Industrial Service Co.

---

**DIVISION OFFICE**

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

**BRANDENBURG INDUSTRIAL SERVICE COMPANY**

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

# Brandenburg®

**Job Name:** NRG Encina PowerStation

**Job #:** MA0842

**Month Ending:** September

Equipment Number	Tier 4 Inspection	Description	Equipment Move on	Equipment Move Off	EIN #
41935	Green; #2; 11/21/2019	Bobcat S770	11/11/2019		FP4A83
41936	Green; #3; 11/21/2019	Bobcat S770	11/11/2019		GC4A66
41937	Green; #4; 11/21/2019	Bobcat S770	11/11/2019		YG9P77
10206385 (Rental)	N/A	20 ft Scissor Lift	7/14/2020		N/A
37037	N/A	Air Compressor	12/12/2019		N/A
41951	Green; #6; 1/07/2020	Bobcat S770	1/7/2020		JN8S96
41952	Green; #7; 1/07/2020	Bobcat S770	1/7/2020		XY9V35
436081	N/A	45' Eletric Man Lift	1/16/2020		N/A
25225	Green; #13; 02/24/2020	Komatsu WA500 Loader	2/21/2020		BT4G48
41956	Green; #15 04/09/2021	Bobcat S770	4/09/2021		KP3K59
00981	Green; #14 3/16/2020	Doosan G70 Generator	3/16/2020		N/A
10263	Green; #20 7/28/2020	Liebherr 926 Track Excavator	7/27/2020		RP6M67
P1032915 (Rental)	N/A	Water Truck	7/29/2020		N/A
12054	Green; #31 11/2/2020	12k Lull	10/31/2020		DB3C39
46417	Green; #28 09/27/2020	Liebherr R956 Track Excavator	9/26/2020		XG3J59

**BRANDENBURG INDUSTRIAL SERVICE COMPANY**

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# Brandenburg®

45156	Green; #26 09/22/2020	Liebherr R956 Track Excavator	9/21/2020		FF8U93
00989	N/A	Doosan G70 Generator	12/14/2020		N/A
30466	N/A	Doosan G70 Generator	12/14/2020		N/A
00982	N/A	Doosan G70 Generator	12/14/2020		N/A
30468	N/A	Dustboss Generator	12/14/2020		N/A
30467	N/A	Dustboss Generator	12/14/2020		N/A
30469	N/A	Dustboss Generator	12/14/2020		N/A
10021	Green #36 04/12/2021	976 Lienherr	04/05/2021		DG6D66
25041	Green #16 04/09/2021	973 Track Loader	4/9/2021		YF7677
10435356	Green #49 07/24/2021	135' JLG Manlift	7/24/2021		TB3586
1009364	Green #1009364	Bobcat S550	4/20/2021	08/12/2021	EN5X73
549832	Green #48	Tadano GR900XL	6/22/2021		LN6J68
30474	Green #42	Street Sweeper	5/10/2021		KC8N56
647517	Green #46	JLG 80' Manlift	6/18/2021		FK7R36
10182623	Green #47 06/21/2021	JLG 80' Manlift	6/21/2021		PK6C74
10171	Green #51 07/30/2021	Liebherr 956 Track Excavator	07/30/2021		VD5E49
8790-22	Green #50 07/28/2021	Bobcat T550 Skidsteer	07/28/2021		YM4R89
AHGM19707	Green #53 08/13/2021	Bobcat S550 Skidsteer	08/12/2021	09/10/2021	NW6D33

## BRANDENBURG INDUSTRIAL SERVICE COMPANY

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

# Brandenburg®

35074	Green #52 08/18/2021	Liebherr 984 ER Track Excavator	08/17/2021		LH9Y68
24459806	N/A	Trench Roller	08/19/2021		N/A
EC92010022	N/A	Freighliner 5yd Dump Truck	08/20/2021		N/A
1018706	Green #54 09/22/2021	JCB 50520TC	09/22/2021		FX6D59
10418573	Green #56 09/24/2021	Bobcat T76	09/24/2021		KM6P53

**BRANDENBURG INDUSTRIAL SERVICE COMPANY**

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ATTACHMENT D

BIO-6  
PHASE IV BIOLOGICAL RESOURCES  
MONTHLY COMPLIANCE REPORT  
SEPTEMBER 2021

Cabrillo Power I LLC

**Biological Resources Monthly  
Compliance Report (07-AFC-06C)  
Phase IV – Demolition of  
Encina Power Station**

September 2021 Reporting Period

October 2021

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## **APPENDIX A - BIOLOGICAL RESOURCES COMPLIANCE MONITORING LOG**

## **APPENDIX B - OBSERVED WILDLIFE SPECIES LIST**

This Monthly Compliance Report (MCR) summarizes biological resources monitoring activities and documentation conducted during the demolition phase of the Encina Power Station (EPS) from September 1 through September 30, 2021, in accordance with the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP). The following biological Conditions of Certification (COCs) pertaining to monitoring activities covered by this MCR include, but are not limited to:

- BIO-2 Designated Biologist Duties
- BIO-4 Designated Biologist and Biological Monitor Authority
- BIO-5 Biological Resources Worker Environmental Awareness Program (WEAP);
- BIO-6 Biological Resources Mitigation Implementation and Monitoring Plan;
- BIO-7 General Impact Avoidance Mitigation Features; and
- BIO-8 Mitigation Management to Avoid Harassment or Harm.

## 2.0

### **BIOLOGICAL MONITORING SUMMARY**

This section summarizes biological monitoring activities conducted during the September 2021 reporting period. Demolition mobilization began November 2019, and the start of demolition began on January 29, 2020.

Biological monitoring by the Designated Biologist is conducted on a monthly basis outside of the nesting season. The Biological Resources Compliance Monitoring Logs are provided in Appendix A. A list of wildlife species observed during the monitoring events is included in Appendix B. There are no Wildlife Observation Forms (WOF) for this reporting period.

The frequency and duration of monitoring is dependent upon the biological resources located within, as well as transiting through the work area. Biological monitoring will continue as described above, as well as on-call monitoring, when necessary, until the Designated Biologist determines that a change is necessary for the protection of sensitive biological resources or a reduction in monitoring is warranted because of a lack of biological resources within the site.

All on-site staff receives WEAP training prior to start of work. The hardcopy sign-in training logs are submitted separately.

## 2.1

### **NESTING BIRDS**

There are no active nests or Environmentally Sensitive Area (ESA) buffers on-site. A list of wildlife species observed during the monitoring events are included in Appendix B.

## 2.3

### **SPECIAL-STATUS SPECIES**

Three special-status avian species were observed during the reporting period, which included the following: California brown pelican (*Pelecanus occidentalis californicus*; California Department of Fish and Wildlife [CDFW] Fully Protected [FP]), California gull (*Larus californicus*; CDFW Watch List [WL]), and double-crested cormorant (*Phalacrocorax auratus*; CDFW WL). California Natural Diversity Database (CNDDDB) forms were not submitted for the species listed above because the occurrences are not qualifying life event. As stated in the CNDDDB data submission guidelines, birds in transit (fly-overs) and detections of foraging or perched birds are

not added (CDFW, 2016)<sup>1</sup>. A list of wildlife species observed during the monitoring events are included in Appendix B.

## **2.4 WILDLIFE DISPLACEMENT, INJURIES, AND MORTALITIES**

### **2.4.1 *Migratory Bird Treaty Act Protected Species***

No injured or dead species protected by the MBTA were observed within the EPS site. The American peregrine falcon pair readily hunts and consumes prey within the EPS site. Therefore, small pieces of prey remnants are found, but not whole bird carcasses. A list of wildlife species observed during the monitoring events are included in Appendix B.

### **2.4.2 *Other Species***

No additional injured or dead wildlife species were observed within the EPS site. A list of wildlife species observed during the monitoring events are included in Appendix B.

## **2.5 HAZARDOUS MATERIAL SPILLS**

No project-related hazardous material spills were observed during the biological monitoring visits.

## **2.6 TRASH**

Litter, including wind-blown, were observed during the biological monitoring visits. Litter removal requests were submitted to the demolition contractor.

## **2.8 NON-COMPLIANCE REPORT**

No non-compliance notifications or incident reports were issued.

---

<sup>1</sup> California Department of Fish and Wildlife (CDFW). 2016. *Submitting Avian Detections to the CNDDDB*. Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=25731>

*Appendix A*  
*Biological Resources Compliance Monitoring Logs*



# NRG Energy Encina Power Station (EPS) Project

## BIOLOGICAL RESOURCES COMPLIANCE MONITORING LOG

Date		Monitor			Time (Begin-End)	
September 13, 2021		Melissa Fowler			10:00-12:00	
Temperature (°F)	Humidity (%)	Wind (mph)	Precipitation (Y/N, amount)	Visibility	Weather Comment	
69	77	7	N	Moderate visibility (6 mi)	100% cloud cover/overcast	
<b>Location(s) of Work Site Activities Monitored</b>						
NRG EPS site.						
<b>Summary of Biological Resources Monitoring Observations</b>						
<p>Biological resources monitoring for biological constraints, special-status species, and nesting birds was conducted at the NRG EPS site.</p> <p><b>Nesting Bird Observations:</b></p> <ul style="list-style-type: none"> <li>No observations were noted.</li> </ul> <p><b>Special-Status Species Observed:</b></p> <ul style="list-style-type: none"> <li>California brown pelicans (<i>Pelecanus occidentalis californicus</i>; California Department of Fish and Wildlife Service [CDFW] Fully Protected [FP]) were observed within the project vicinity.</li> <li>A California gull (<i>Larus californicus</i>; CDFW Watch List [WL]) was observed within the project vicinity.</li> <li>Double-crested cormorants (<i>Nannopterum auritum</i>; CDFW WL) were observed within the project vicinity.</li> <li>No additional special-status species were observed.</li> </ul> <p><b>Other Biological Resources Observations:</b></p> <ul style="list-style-type: none"> <li>No additional observations were noted.</li> </ul> <p><b>Other Observations/Comments:</b></p> <ul style="list-style-type: none"> <li>Litter was observed within the EPS site. A litter removal request was submitted to the contractor.</li> <li>Uncovered trash receptacles were observed. A request was submitted to the contractor to cover all trash receptacles.</li> <li>No additional observations were noted.</li> </ul>						
<b>Items Requiring Action/Follow-up</b>						
<ul style="list-style-type: none"> <li>A request was submitted to the contractor to conduct litter removal and cover all trash receptacles.</li> </ul>						
<b>Wildlife Species Observed</b>						
<p>American crow (<i>Corvus brachyrhynchos</i>), Anna's hummingbird (<i>Calypte anna</i>), black-chinned hummingbird (<i>Archilochus alexandri</i>), California brown pelican, California gull, California towhee (<i>Melospiza crissalis</i>), common yellowthroat (<i>Geothlypis trichas</i>), double-crested cormorant, European starling (<i>Sturnus vulgaris</i>), house finch (<i>Haemorrhous mexicanus</i>), lesser goldfinch (<i>Spinus psaltria</i>), mourning dove (<i>Zenaidura macroura</i>), royal tern (<i>Thalasseus maximus</i>), song sparrow (<i>Melospiza melodia</i>), western fence lizard (<i>Sceloporus occidentalis</i>), and western gull (<i>Larus occidentalis</i>).</p>						

Photo 1



Location

EPS site

Description

Overview of the northern staging area.

Photo 2



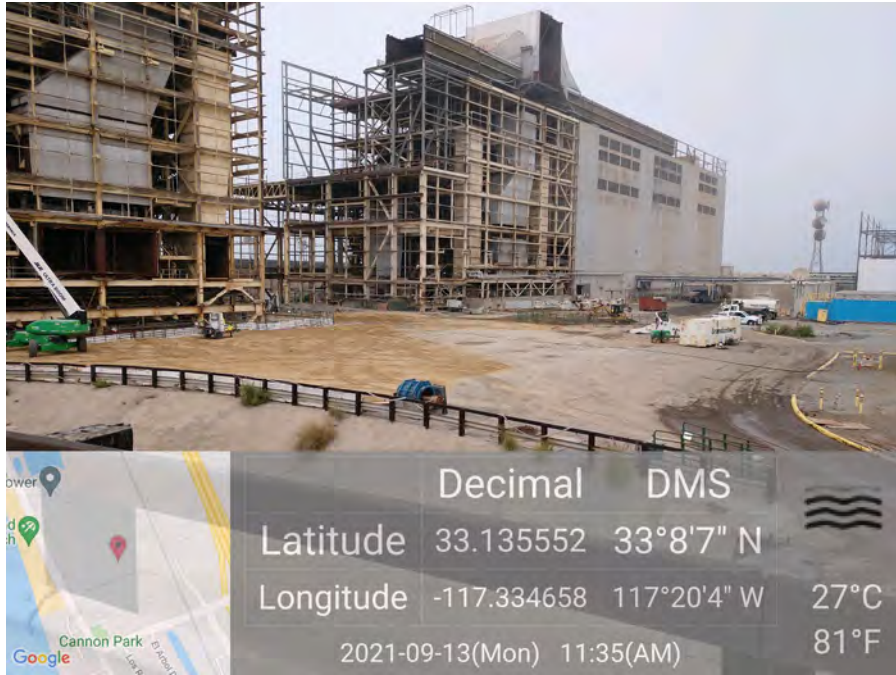
Location

EPS site

Description

An uncovered trash receptacle was observed.

Photo 3



Location	EPS site	Description	Overview of demolition activities.
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Photo 4



Location	EPS site	Description	Litter was observed along the silt fence.
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*Appendix B*  
*Observed Wildlife Species List*

**Observed Wildlife Species List September 2021  
Encina Power Station**

Common Name	Scientific Name	Status Federal/State/Other
<b>Birds</b>		
American crow	<i>Corvus brachyrhynchos</i>	--/--/--
Anna's hummingbird	<i>Calypte anna</i>	--/--/--
Black-chinned hummingbird	<i>Archilochus alexandri</i>	--/--/--
California brown pelican	<i>Pelecanus occidentalis californicus</i>	--/FP/--
California gull	<i>Larus californicus</i>	--/WL/--
California towhee	<i>Melospiza crissalis</i>	--/--/--
Common yellowthroat	<i>Geothlypis trichas</i>	--/--/--
Double-crested cormorant	<i>Nannopterum auratus</i>	--/WL/--
European starling	<i>Sturnus vulgaris</i>	--/--/--
House finch	<i>Haemorhous mexicanus</i>	--/--/--
Lesser goldfinch	<i>Spinus psaltria</i>	--/--/--
Mourning dove	<i>Zenaida macroura</i>	--/--/--
Royal tern	<i>Thalasseus maximus</i>	--/--/--
Song sparrow	<i>Melospiza melodia</i>	--/--/--
Western gull	<i>Larus occidentalis</i>	--/--/--
<b>Reptiles</b>		
Western fence lizard	<i>Sceloporus occidentalis</i>	--/--/--

**Source:**

California Department of Fish and Wildlife (CDFW), Natural Diversity Database. November 2020. Special Animals List. Periodic publication. 116 pp.

**Status Codes:**

If status codes are not provided, it indicates that the observed species is not a special-status species.

**Federal:**

FE = Federally listed Endangered: species in danger of extinction throughout a significant portion of its range

FT = Federally listed Threatened: species likely to become endangered within the foreseeable future

BCC = Birds of Conservation Concern

**State:**

SE = State listed as Endangered

ST = State listed as Threatened

FP = Fully Protected

CSC = California Species of Special Concern Species of concern to California Department of Fish and Wildlife (CDFW) because of declining population levels, limited ranges, and/or continuing threats have made them vulnerable to extinction.

S = Sensitive

WL = Watch List

SP = Special Animals List

**Other:**

- Bureau of Land Management (BLM), United States Department of Interior – Sensitive (S)

- California Department of Forestry and Fire Protection (CDF) classifies “sensitive species” as those species that warrant special protection during timber operations.

- North American Bird Conservation Initiative (NABCI) - Red Watch List (RWL)

- United States Forest Service (USFS) – Sensitive (S)

ATTACHMENT E

CUL-5 AND PAL-5  
CERTIFICATION OF COMPLETION,  
WORKER ENVIRONMENTAL AWARENESS PROGRAM,  
SEPTEMBER 2021

*No WEAP training required in September 2021*

ATTACHMENT F

CUL-6/PAL-6  
PALEONTOLOGICAL RESOURCE MONITORING  
SEPTEMBER 2021

*No monitoring required in September 2021*



ATTACHMENT G

NOISE-2/COM-11  
SUMMARY TABLE OF NOISE HOTLINE CALLS  
AND PROJECT RELATED COMPLAINTS  
SEPTEMBER 2021

*No noise hotline calls or project related complaints in  
September 2021*

**Encina Power Station Demolition  
Noise Hotline Calls  
September 2019 through September 2021**

Date	Time	Log Number	Caller	Issue	Returned Call / Resolution	Corrective Action Completion Date
10/2/2020	10:48 AM	10022020-1	Michelle Peters - Poseidon - email	Carlsbad Desalination Plant inquired about visible emissions during demolition/equipment cutting activities.	Cabrillo Power I LLC responded on 10/2/2020 via email and have continued communications with Poseidon/Carlsbad Desalination Plant. Measures to reduce visible emissions and monitoring (personal and visible emissions estimator) have been implemented and continue to be evaluated.	10/14/2020 - Issue resolved
10/13/2020	6:43 PM	10132020-1	Mr. Halpin - Hotline Call	Community member walking along the western perimeter of Encina, along Carlsbad Blvd, called with concerns about smelling fumes from the demolition activities.	Caller was contacted and the odor issue was discussed. Odor was related to demolition activities associated with cutting the generators. Additional industrial fans have been placed within the power block building during these cutting activities.	10/14/2020 - Issue resolved
10/28/2020	Unk	10282020-2	California OSHA - Letter dated October 22, 2020 and received on October 28, 2020	Letter from CA OSHA regarding anonymous complaint that demolition project was in violation of five (5) separate California Title 8 Code of Regulations.	Cabrillo Power I LLC provided a written response to CA OSHA on November 6, 2020, which individually addressed and provided evidence to support compliance with each of the five (5) California Title 8 Code of Regulations which were alleged to be non-compliant.	11/6/2020 - Issue resolved
11/5/2020	2:38 PM	11052020-2	Tina Carter- SDG&E - Called Cabrillo directly	Mrs. Tina Carter, an employee of SDG&E contacted Encina Power Station directly regarding a complaint she received from an SDG&E Storeroom employee at the Cannon Road SDG&E service center. The storeroom employee was concerned with the air quality of the air he was breathing as he observed smoke emanating from the Encina Power Station powerblock.	In response to the complaint, SDG&E was contacted and informed the work had been discontinued for the remainder of the day. NRG's Air Quality Compliance Manager for the demolition project suspended cutting/torching activities, known as "shotgunning" that use the larger diameter cutting rods, due to the current ambient weather conditions. Mitigation measures were implemented with numerous fans and short duration cutting periods, but may not have been sufficient due the changing ambient weather conditions. A Visible Emissions Evaluator (VEE) was also monitoring and visible emissions were not observed that exceed SDAPCD Rule 50 or criteria in AQ-SC3 or AQ-SC4.	Phone call - 11/05/2020 @2:51PM Issue resolved

**Encina Power Station Demolition  
Noise Hotline Calls  
September 2019 through September 2021**

Date	Time	Log Number	Caller	Issue	Returned Call / Resolution	Corrective Action Completion Date
11/6/2020	1:06PM	11062020-3	Michelle Peters - Poseidon - email	Mrs. Michelle Peters an employee of Poseidon's Desalination Facility emailed Encina Power Station regarding a complaint she received from Poseidon contracted employees regarding concerns related to air quality and a "metallic" odor in the air as a result of smoke emanating from the Encina Power Station powerblock during demolition activities entailing equipment cutting.	In response to the complaint, NRG's Air Quality Compliance Manager responded to Mrs. Peters and explained that the cutting process has been completed, and will not recommence until January 2021. Personal monitoring has been conducted inside the turbine hall and outside during these activities. Area monitoring has been conducted at monitoring stations near Encina gates 2 and 3. Personal and area monitoring stations within the building have recorded data that have been below CA OSHA permissible exposure limits (PELs) for dust and the several monitored metals, including lead, arsenic, and cadmium. Mitigation measures were implemented with numerous fans and short duration cutting periods, but may not have been sufficient due to the direction of the wind. A Visible Emissions Evaluator (VEE) was also monitoring and visible emissions were not observed that exceed SDAPCD Rule 50 or criteria in AQ-SC3 or AQ-SC4	Initial Email response on 11/10/2020 - Final email response on 12/4/2020 - Issue Resolved
11/24/2020	12:00PM	11242020-5	Kristin Hamon - SDG&E- Emailed Cabrillo directly	Mrs. Kristin Hamon, an employee of SDG&E contacted Encina Power Station via email regarding a complaint she received from an SDG&E employee at the Cannon Road SDG&E service center. The employee was concerned with the air quality and when the activities causing the air quality concerns would cease. The question of what Prop 65 exposures to SDG&E employees were occurring at or around the property lines was asked.	The emissions that the SDG&E employee noted were from typical torch cutting of equipment in the basement. The cutting had been conducted during the morning and was completed by the early afternoon. There was a 10-15 mph southwest wind that was present during the cutting which would have moved any emissions away from the SDG&E Cannon Service Center. In response to the complaint, NRG's Air Quality Compliance Manager for the demolition project confirmed that mitigation measures were implemented with numerous fans operating. No visible emissions were observed leaving the Encina power block according to site personnel contacted after the complaint. SDG&E was contacted and informed the work had been discontinued for the remainder of the day, and would not resume again until after the Thanksgiving Holiday period. SDG&E was also informed that prior results from similar activities have indicated results below PELs for Prop 65 listed metals (arsenic, cadmium, chromium and lead).	Email response on 11/24/2020 - Issue resolved

**Encina Power Station Demolition  
Noise Hotline Calls  
September 2019 through September 2021**

Date	Time	Log Number	Caller	Issue	Returned Call / Resolution	Corrective Action Completion Date
11/30/2020	2:41PM	N/A	Terry Cook	Ms. Cook's father was one of the first operators at Encina Power Station. She heard that she may be able to get a piece of the demolition material. She asked if she could have a piece of the demolition material? Would like a call back.	Ms. Cook was contacted and informed that no decisions regarding these types of special requests have been considered yet. The project committed to staying in touch, and communicated that the project will be in a better position during the Summer of 2021 to consider these requests more fully.	Email and phone response on 12/04/2020 - ongoing review
1/7/2021	11:37PM	01072021-7	Kerry Siekmann - Terramar Community Member	Ms. Siekmann contacted the Carlsbad Energy Center Noise Hotline at 11:37PM rather than the Encina Demolition Hotline to indicate that the FAA lights on the Stack/Chimney were not on/illuminated. She expressed a safety concern for aircraft that would rely on the stack lights. Heavy fog was present during Ms. Siekman observations.	Encina Power Station confirmed by inspection of security camera footage at 11:38 PM and 11:43 PM from Carlsbad Energy Center that the FAA stack lights were orking/illuminated. Ms. Siekmann was texted at 11:57 PM that the lights were confirmed to be on/working. Ms. Siekmann responded on January 8 at 9:11 AM that the lights were not visible. Following Ms. Siekmann's text, the lights were again confirmed to be working.	Text response on 01/07/2021 - Issue resolved
1/19/2021	4:00PM	01192021-6	SDAPCD Inspector - Jason LaBlond on behalf of local community member	On January 26, 2021 the San Diego Air Pollution Control District (SDAPCD) notified Encina that a jogger running on Carlsbad Boulevard between 10:00 and 10:30PM on the night of January 19, 2021 complained of an odor and burning eyes. The project's demolition contractor was cutting the Unit 3 stator with a smaller propane/oxygen torch within the powerbock building. Santa Ana-type winds (offshore winds from east to west toward Carlsbad Blvd) were apparent according to NRG personnel who were onsite observing the work and wind direction. Industrial fans were used during torch cutting of the stator to help dissipate potential odors. Cutting was also done intermittently to minimize potential for accumulation of odors or visible emissions. This specific cutting work was conducted from January 19-26, 2021, and no other complaints were reported during this period. This cutting work has been completed.	The SDAPCD inspector was contacted and the work that was being performed was described. The inspector understood the type of activity that was taking place, and had no other questions.	Verbal communication with the SDAPCD inspector 01/27/2021 - Issue resolved

ATTACHMENT H

TRANS-5  
ROADWAY INSPECTION  
SEPTEMBER 2021

*There was no heavy construction-equipment traffic for demolition of  
Encina Power Station in September 2021*

ATTACHMENT I

TRANS-6  
TRANSPORTATION PERMITS  
SEPTEMBER 2021

*There were no transportation permits required in September 2021*

ATTACHMENT J  
TRANS-8  
TRAFFIC ENCROACHMENT PERMITS  
SEPTEMBER 2021

*No traffic encroachment permits were obtained in September 2021*



ATTACHMENT K

SOIL&WATER-2  
CONSTRUCTION WATER USAGE SUMMARY

SOIL&WATER-9  
WASTEWATER SUMMARY

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

Water use Summary, September 2021.

Phase IV Demolition (Started December 2019)

Potable Water Used\*: 583,310 gallons

Reclaim Water Used\*\*: 1,695,350 gallons

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Completed Phase(s)

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Phase I Demolition (Completed December 2016)

Potable Water Used: 612,700 gallons

Reclaim Water Used: 0 gallons

Phase II Construction Total Water Use (Completed December 2018)

Potable Water Used: 6,575,440 gallons

Reclaim Water Used: 13,145,265 gallons

Phase III Decommissioning (Completed December 2019)

Potable Water Used\*: 0 gallons

Reclaim Water Used\*\*: 0 gallons

---

Cumulative Water Use Phase I, II, III, IV

---

Potable Water Used: 7,773,450 gallons

Reclaim Water Used: 14,840,615 gallons

\*Potable use includes sanitary, hydrotesting, landscape irrigation, and other plant operations, including Phase III Decommissioning and Phase IV Demolition not suitable for reclaim water use (worker contact applications).

\*\*Reclaim use includes dust control and compaction.

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

Wastewater Generation and Disposal Summary  
Construction Phase

*ACECP did not generate or dispose of any wastewater offsite in September 2021.*

ATTACHMENT L

GEN-2 and TSE-1  
MASTER DRAWING LIST UPDATE  
SEPTEMBER 2021

*No master drawing list exists for demolition in September 2021*

ATTACHMENT M

GEN-3  
PROOF OF PAYMENT TO DCBO  
SEPTEMBER 2021

ATTACHMENT N

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

SEPTEMBER 2021

*No DCBO approvals or inspections were conducted for demolition in  
September 2021*

LIST OF DCBO PLAN APPROVALS  
AND INSPECTIONS  
SEPTEMBER 2021

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

CBO Package No.	Date Submitted	Description	COC

CBO MECHANICAL INSPECTIONS  
SEPTEMBER 2021

CBO Package No.	Date Submitted	Description	COC



ATTACHMENT O

WORKER SAFETY-3  
CONSTRUCTION SAFETY SUPERVISOR  
MONTHLY SAFETY REPORT & SAFETY INCIDENTS  
SEPTEMBER 2021

**MONTHLY SAFETY REPORT**

October 7, 2021

This letter serves as a summary of safety related activities for the month of October 2021.

During the month of September, a total of 10 employees completed site training for the Encina Power Station demolition project. Trained personnel consisted of employees from Brandenburg, Paul Hansen Equipment, and University Mechanical (Paul Hansen Equipment Sub-Contractor).

Brandenburg had 22 working days in the month of September. On each of these days, safety briefings were held with the individual crews each morning. After each morning briefing, each crew would break off to work areas to put together and complete their Task Safety Analysis prior to beginning work.

Also completed during the month was monthly safety topic covering Crystalline Silica Hazard Awareness, and COVID-19 precautions.

Brandenburg management completed 28 documented safety related inspections.

Brandenburg completed 479 Safety Observations (SOS submittals) for the month of September. See attached documents that review the specific data of these observations.

Sean Greenya, ASP, CHST - Brandenburg Project Safety Manager

# Brandenburg®

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October 7, 2021

Project Code: MA0842

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

Attn: Tim Sisk  
Environmental Manager

**Subject: Monthly Onboarding**

Dear Mr. Sisk:

This letter confirms that Brandenburg Industrial Services Company performs montly onboarding and orientation of new employee's. Attached is the monthly onboarding of employee's.

Please let me know if any further information is required.

Best regards,

*Liam J Campbell*

Liam Campbell  
Brandenburg Industrial Services Co.

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**DIVISION OFFICE**

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

**BRANDENBURG INDUSTRIAL SERVICE COMPANY**

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

# Brandenburg®

**Job Name:** NRG Encina PowerStation


**Job #:** MA0842

**Month Ending:** September 2021

Monthly OnBoarding	
Name	Training Date
David Guevara—Brandenburg	9/8/2021
Matthew Rojel—Brandenburg	9/8/2021
Juan Garcia Jr.—Brandenburg	9/9/2021
Erick Avalos—Paul Hansen Equipment	9/13/2021
Daniel Downing—Paul Hansen Equipment	9/13/2021
Israel Cruz—Paul Hansen Equipment	9/13/2021
Ramiro Gonzalez—Brandenburg	9/14/2021
Jose Nunez—Brandenburg	9/21/2021
Matt Cornelius—University Mechanical (Paul Hansen Equipm Sub-Contractor)	9/23/2021
Michael Burns—University Mechanical (Paul Hansen Equipm Sub-Contractor)	9/23/2021

ATTACHMENT P

WORKER SAFETY-4  
CBO SAFETY MONITOR INSPECTION  
MONTHLY SAFETY REPORT  
SEPTEMBER 2021

	<b>West Coast Code Consultants, Inc.</b> <b>2400 Camino Ramon Blvd. #240</b> <b>San Ramon, CA. 94583</b> <b>925-275-1700</b>				Report #	9/9/2021-0028	
					Page:	1 Of 9	
					Day:	Thursday	
					Project #:	# 07-AFC-06C	
<b>DCBO Safety Monitors Site Report</b>							
Project Name		ENCINA DEMOLITION / NRG 07-AFC-06C				Date	9/9/2021
Project Location		4600 Carlsbad Blvd. Carlsbad, CA. 92008				Time Arrived	0630 hrs.
General Contractor		BRANDENBERG / BISCO				Time Departed	1330 hrs.
Inspectors		<input checked="" type="checkbox"/> Field Report <input type="checkbox"/> Notice to Comply NC #				Date Cleared	9/10/2021
STEVE HERMSMEYER, DCBO	<input type="checkbox"/>	Field Welding		<input type="checkbox"/>	Reinforcing Steel	<input type="checkbox"/>	PT Stressing
Type of inspection Performed	<input type="checkbox"/>	Expansion Bolts		<input type="checkbox"/>	Masonry	<input type="checkbox"/>	PT Placement
	<input type="checkbox"/>	Structural Steel Erection		<input type="checkbox"/>	Torque or Pull Testing	<input type="checkbox"/>	Fireproofing – MK-6/HY
WS- 1, WS -4, WS -3	<input checked="" type="checkbox"/>	Other	SAFETY MONITOR RPRT		Weather	Sunny 74 degrees UV 3 Wind 2-3 mph WSW	
Documents Referenced	<input type="checkbox"/>	Soils Report	<input type="checkbox"/>	Plans Dated	<input checked="" type="checkbox"/>	Submittal	WS - 2
	<input type="checkbox"/>	RFI #			<input type="checkbox"/>	CBC	
Material used:		Site review inspection, interviews					

**DOCKET # 07-AFC-06C**

**Project Name: ENCINA DEMOLITION Phase 4**

**TIME: 0630 hrs.**

**Persons Contacted:** Ralph Wagner, NRG Project Director; Tommy Brister, NRG Site Safety Manager; Dave Michelsen, NRG Project Manager, Scott Smith, Encina Plant Manager

**DESCRIPTION of VISIT & FINDINGS:**

- 1.) Arrived at Guard Station and displayed Entry ID Badge at 0630 hrs. Met with Tommy Brister, NRG CSS, Dave Michelsen, Project Manager. Discussed current status of work and any additional events. Workforce continues to be at 100 craft and supervisors. Safety remains the most serious focus recent violations of Brandenburg's Health & Safety Policy have led to removals of violators and a Safety Stand Down in recent weeks and retraining of all craft onsite. NRG and staff have maintained a rigid position on all safety miscues. There have been no near miss or first aid incidents due to this serious approach by NRG. Work hours continue at 5 – 10 hour days and 1 – 8 hour day. Safety Meetings/Tailboard Meetings are held each day within each individual crew group. On site the largest single work group continues to be the abatement crews. There still is significant Asbestos removal to be completed. Approximately 60 workers are engaged in that effort daily. Water misters are continuously keeping the concrete demo areas damp to control the dust generation. There will be future confined space work and backfilling of water channels is ongoing. Chipping Operations are in progress on turbine foundations in Unit #4. PPE use and work habits as observed on this date were carefully being utilized and I was impressed by the housekeeping conditions of the site and the care taken to address any issues on a continuous basis throughout the day.

**RECOMMENDATIONS:**

With ongoing craft numbers to remain at 100 onsite through October adjustments will need to be made for work schedules and consideration given to available daylight. Temperatures will also be affected by seasonal changes. Given the lengthening of the overall schedule caution should be exercised to refrain from any effort to accelerate the pace of the work. NRG is preparing for these potential challenges.

**PHOTOS:**

**Photo #1:** Importing Soil for backfill at southeast corner to establish a level pad for equipment for structural demo





**Photo #2:** I y center importing soil from energy center stockpile



Completed ACM abatement per Unit is as follows:

Unit #1	90%
Unit #2	90%
Unit #3	100%
Unit #4	100%
Unit #5	100%

Asbestos Roof Panels still remain in Units #1, #2, #3 and a portion of Unit #4

### **Transite Panel Abatement:**

100% Abated  
0% Remaining

Completion of Abatement onsite Scheduled for Fall 2021



## Turbine Machinery Status Removal:

Unit #1	Completed	100%
Unit #2	Completed	100%
Unit #3	Completed	100%
Unit #4	Completed	100%
Unit #5	Completed	100%

## Structural Demo Percentages Completed

Unit #1	0% none completed
Unit #2	0% none completed
Unit #3	0% none completed
Unit #4	Turbine Fdn. 50% completed
Unit #5	W. Struct Steel 25% completed
	Turbine Fdn. 100%

## Site Work Force.

Brandenberg Supervisors/Managers	100
Brandenberg Craft Workers onsite	80
Morrow Meadows Electric onsite	0
Pullman Demolition	0

**Photo #3:** South and East facing exteriors of Encina Structure





**Photo #4:** Demo of Foundation at Unit #4 turbine foundation



**Photo #5:** Southwest corner equipment staged and refueling





**Photo #6:** Closeup of Unit #4 turbine Fdn Demo



**Photo #7:** Demo and structural steel used as straight edge to level grade





**Photo #8:** Exposed structural framework at west wall



**Photo #9:** Autographs from steelworkers during construction of Unit #5





**Photo #10: Chipping at Foundation**



**Photo #11: Former Transmission Bay**





**Photo #12:** Water Channels in progress to be backfilled



**Photo #13:** Ramp up to East Side





**Photo #14:** Water Channel on left Unit #4 in Center East side of building to right



**Photo #15:** Super Structure waiting for completion of abatement of roof asbestos





**Photo #16:** Water Channels ongoing backfill operations



**Photo #17:** Large Excavator Demo Chipper new to site






**Photo #18:** Interior floor levels exposed after removal of Unit#5



**END OF REPORT**

	<b>West Coast Code Consultants, Inc.</b> <b>2400 Camino Ramon Blvd. #240</b> <b>San Ramon, CA. 94583</b> <b>925-275-1700</b>				Report #	9/29/2021-0029					
					Page:	1 of 10					
					Day:	Wednesday					
					Project #:	# 07-AFC-06C					
<b>DCBO Safety Monitors Site Report</b>											
Project Name				ENCINA DEMOLITION / NRG 07-AFC-06C		Date		9/29/2021			
Project Location				4600 Carlsbad Blvd. Carlsbad, CA. 92008		Time Arrived		0630 hrs.			
General Contractor				BRANDENBERG / BISCO		Time Departed		1330 hrs.			
Inspectors		<input checked="" type="checkbox"/> Field Report <input type="checkbox"/> Notice to Comply NC #				Date Cleared		9/30/2021			
STEVE HERMSMEYER, DCBO	<input type="checkbox"/>	Field Welding	<input type="checkbox"/>	Reinforcing Steel	<input type="checkbox"/>	PT Stressing	<input type="checkbox"/>	Concrete			
Type of inspection Performed	<input type="checkbox"/>	Expansion Bolts	<input type="checkbox"/>	Masonry	<input type="checkbox"/>	PT Placement	<input type="checkbox"/>	Epoxy			
	<input type="checkbox"/>	Structural Steel Erection	<input type="checkbox"/>	Torque or Pull Testing	<input type="checkbox"/>	Fireproofing – MK-6/HY	<input type="checkbox"/>	HS Grout			
WS- 1, WS -4, WS -3		<input checked="" type="checkbox"/> Other	SAFETY MONITOR RPRT		Weather				Sunny 70 degrees UV 3 Wind 2-3 mph SW		
Documents Referenced	<input type="checkbox"/>	Soils Report	<input type="checkbox"/>	Plans Dated	<input checked="" type="checkbox"/>	Submittal	WS - 2	<input type="checkbox"/>	RFI #	<input type="checkbox"/>	CBC
Material used:		Site review inspection, interviews									

**DOCKET # 07-AFC-06C**

**Project Name: ENCINA DEMOLITION Phase 4**

**TIME: 0630 hrs.**

**Persons Contacted:** Ralph Wagner, NRG Project Director; Tommy Brister, NRG Site Safety Manager; Dave Michelsen, NRG Project Manager, Scott Smith, Encina Plant Manager

**DESCRIPTION of VISIT & FINDINGS:**

- 1.) Arrived at Guard Station presented my ID Badge at 0630 hrs. Met with Tommy Brister, NRG CSS, Dave Michelsen, Project Manager. Discussed current status of work. Workforce continues to be at 100 craft and supervisors. On site the largest single work group continues to be the abatement crews. There is continuing Asbestos removal activity in Unit #2 & Unit #1. Approximately 60 workers are engaged in that effort daily. Turbine Foundations in Unit #4 have been removed completely. Unit #5 superstructure is currently the focus of heavy demo. Structural supports are removed after internal equipment is extracted from the east side of the Unit. Clean up of rebar and steel components are loaded onto trucks to be hauled to the recycler. All trucks are weighed on the scale at Gate #3 before exiting the site. Fifteen Trucks daily are removing scrap metal materials offsite. Soil import activity is completed approx. 32,000 cu. yds. have been moved onsite for backfill around the power station. Unit #3 ACM roofing material is in process of removal once removed and dropped in enclosed chutes into sealed containers it is moved into sealed debris boxes and removed from site. Turbine Roofs at Unit #1, #2, & #3 are ongoing work for removal. Final Cleaning in the basement area of Unit #3 is completed. As ACM removal is completed in Units #1 & Unit #2 Final Cleaning will be undertaken Final Air Clearance will be done at completion of cleaning. Backfilling is underway in below floor discharge tunnels. Addition of a double shift is in planning stages for Encapsulation Work in Unit #1 & Unit #2 a decision has not been made however at this time. At the end of the day Ralph Wagner, NRG Project Director and I took a detailed tour of the remaining planned demo activity outside the power plant footprint including the WWTT Tanks and Pumps, Warehouse Structures on the Southeast corner of the project site as well as locations and elevations of final grade at the conclusion of backfill activity onsite. I found it informative and a very detailed illustration of how extensive the project is. I appreciated Ralph's time and explanations through the afternoon.



**RECOMMENDATIONS:**

Going forward as the site demo becomes increasingly mechanized the crew size onsite will be reduced from the daily 100 men and women at this time to approx. 35-40 equipment operators and supervision. There will continue to be foot traffic onsite as spotters and flagmen are spread across the site. The reduction in crew does not lessen the potential for accidents or injury, heavy equipment, numerous types moving in erratic directions performing demo work are dangerous environs for operators and foot traffic onsite. Increased vigilant supervision is required to ensure the safety of all workers. Dust and obscured vision from all demo activity are also a concern. Dust protection masks should be worn by all foot traffic, operators in equipment with environmental cabs are protected all others are not. **Required PPE should be rigidly enforced onsite.**

**PHOTOS:**

**Photo #1: Imported Soil Stockpile at North end of site (a)**



**Photo #2: Imported Soil Stockpile at North end of site (b)**



Completed ACM abatement per Unit is as follows:

Unit #1	90%
Unit #2	90%
Unit #3	100%
Unit #4	100%
Unit #5	100%

Asbestos Roof Panels still remain in Units #1, #2, #3 and a portion of Unit #4

### **Transite Panel Abatement:**

100% Abated  
0% Remaining

Completion of Abatement onsite Scheduled for Fall 2021

### **Turbine Machinery Status Removal:**

Unit #1	Completed	100%
Unit #2	Completed	100%
Unit #3	Completed	100%
Unit #4	Completed	100%
Unit #5	Completed	100%

### **Structural Demo Percentages Completed**

Unit #1	0% none completed
Unit #2	0% none completed
Unit #3	0% none completed
Unit #4	Turbine Fdn. 100% completed
Unit #5	W. Struct Steel 45% completed
	Turbine Fdn. 100%



## Site Work Force.

Brandenberg Supervisors/Managers & Brandenberg Craft Workers onsite	100
Morrow Meadows Electric onsite	0
Pullman Demolition	0

**Photo #3: Unit #5 east, boiler unit still intact demo is ongoing of non-structural and structural frame.**





**Photo #4: Unit #5 south, demo ongoing, Unit #4 open bay on left**



**Photo #5: Separating misc. steel for recycle. (a)**





**Photo #6: Separating misc. steel for recycle. (b)**



**Photo #7: Unit #5 Structural demo ongoing east face. (a)**



**Photo #8: Unit #5 Structural demo ongoing east face. (b)**





**Photo #9: Unit #4 Turbine bay Fdn removed**





**Photo #10: Removing Steel and rebar to stockpile**



**Photo #11: Cutting Structural steel for loading onto trucks lower left fire watch, worker in blue fire suit cutter, worker yellow vest supervisor all with required PPE**





**Photo #12: Exposed channel opened to backfill**



**Photo #13: Steel Material stockpile for loading onto trucks**



**END OF REPORT**



ATTACHMENT Q

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

*No non-conformance reports for demolition in September 2021*