DOCKETED		
Docket Number: 01-AFC-17C		
Project Title:	Inland Empire Energy Center Project Compliance	
TN #:	231967	
Document Title:	Decontamination and Demolition Activity Work Plan	
Description:	N/A	
Filer:	Paul Kihm	
Organization:	Latham & Watkins LLP	
Submitter Role:	Applicant Representative	
Submission Date:	2/6/2020 4:34:09 PM	
Docketed Date:	2/6/2020	

DECONTAMINATION AND DEMOLITION ACTIVITY WORK PLAN

DEMOLITION OF THE IEEC POWER GENERATING STATION Inland Empire Energy Company, LLC



POWER PLANT DECOMMISSIONING AND DEMOLITION EXPERIENCE THAT MATTERS



Submitted to:

IEEC/ATC Group Services 910 Louisiana Street, Suite 200B Houston, Texas 77002

January 30, 2020

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Attachment A-Baseline Schedule





1.0 Introduction

Silverado Contractors, Inc., (Silverado, SCI, Contractor) has been contracted to provide environmental/demolition contractor services to Inland Empire Energy Center, LLC (IEEC), a subsidiary of the General Electric Company (GE), for the following project:

INLAND EMPIRE ENERGY CENTER (IEEC) Generating Station Demolition 26226 Antelope Road Menifee, California

The intent of this *Decontamination and Demolition Activity Work Plan* is to present Silverado's overall approach to sequencing, administering and managing its work. This document is programmatic in nature and is used in conjunction with other internal company plans, and project-specific foundational plans such as our *Project-Specific Health and Safety Plan* (HASP), *Quality Assurance Plan* (QAP), and other site-specific plans designed to control, manage and document activities related to work elements such as, but not limited to, controlled demolition, security, dust suppression, waste transport and disposal, traffic and hauling, fire prevention, emergency response. A summary of these various plans and related content is provided in Section 3.0.



Aerial view of the IEEC plant features.

1.1 Planning for Safety

Silverado will execute and administer the IEEC project using company and project-specific policies and procedures designed to identify, communicate, control, approve and authorize our work. We will work collaboratively with IEEC to meet safety and performance objectives, and are committed to the values of safety and accountability for all work we will perform on IEEC's behalf.

Our guiding safety principles and objectives center on the following:





- Having every employee leave the workplace uninjured anything less is unacceptable;
- Conducting our work safely and with integrity, implementing strategies, behaviors and decisions that allow us to manage risks effectively;
- Using work behaviors and practices that uncompromisingly protects the safety of everyone;
- Caring for the safety of each other;
- Stopping work anytime unsafe conditions or behaviors are observed until the job can be completed safely;
- Implementing comprehensive performance management processes and systems that incorporate safety requirements and provide adequate and relevant training; and,
- Providing the ability to report of safety concerns openly, confidentially, or anonymously without fear of reprisal.



Our safety programs reflect standards established by National Demolition Association and the American National Standards Institute for Construction and Demolition.

Silverado achieves its objectives by using safety management processes and systems that verify and confirm <u>before our work starts</u> that our engineering, approach, means and methods are commensurate with the work.

This information is detailed in the individual task-specific Work Plans we use in conjunction with our company and project-specific foundational plans to systematically evaluate tasks and applicable processes or procedures to identify, eliminate, reduce and managed related risks. Additional details about these processes and systems are discussed in Section 3.0.



Safety Philosophy - Our Key Principles

	No Injuries	Safe Behavior, Safe Practices	Quality Care	
	Having every employee leave the workplace uninjured — anything less is unacceptable.	Using work behaviors and practices that uncompromisingly protects the safety of everyone.	Caring for the safety of each other.	
1				
	Stop Work Authority	Training	See Something, Say Something	





1.2 Overview of the Work

Decommissioning and demolition of the IEEC involves the coordination and liquidation of certain equipment, removal of regulated materials, disconnecting of various utilities, dismantling/demolition of specific plant facilities and infrastructure, salvage and recycling of suitable equipment assets/materials, waste management, transport and disposal, and the import, backfill and grading of disturbed voids/areas.

Certain of these activities will be performed by IEEC and its subcontractors, with the remaining activities performed primarily by Silverado. This plan is specific to work to be conducted by Silverado.

1.2.1 Silverado Demolition Scope of Work

The primary features to be demolished by Silverado include those listed below. The sequencing of work is shown on the baseline schedule provided in Attachment A.:

1.2.1.1 Cooling Tower Area

The cooling tower area includes the 16-bay cooling tower and basin, acoustic wall and foundation, fuel gas preconditioning skid, non-reclaim wastewater storage tank, ammonia storage tank and feed pump skid, cooling tower PDC, circulating water pumps, shutdown circulating water pump, cooling tower chemical feed area, oil/water separator, acid storage tanks and feed pump skid, and wastewater sump with pumps.



Cooling Tower Area

Silverado's work in this area includes:

- Demolition and removal of all systems and structures associated with the circulating water system and cooling tower area.
- Remove all above-grade structural members, fiberglass exterior panels, remaining cooling fans and motors, and electrical components and wiring will be removed.
- Saw cut the upper 6" of the cooling tower basin wall and backfill the basin to grade using crushed concrete generated during demolition.

1.2.1.2 Courtyard Operational Area

The area between Units 1 and 2 contains supplemental equipment associated with power generation including the auxiliary boiler, gas conditioning area, fuel gas heater and scrubber, fuel gas moisturizer, SCR drop zone, nitrogen bottle storage area, GT water wash supply, chiller, condensate storage tank, fuel gas fin cooler, fuel gas compressor, wastewater sump with pumps, and hydrogen storage area.





Silverado's work in this area includes:

- Removal/cleaning of all debris and materials from work areas as necessary to support the Work;
- Protection of all equipment and facilities scheduled to remain;
- Disconnection of all utilities within the work area with the exception of those utilities supporting ongoing operations (certain electric, sanitary, potable water, storm water);
- Demolition and removal of all equipment and systems including motors, piping, electrical, tanks, equipment, equipment slabs and pads, supports and associated appurtenances; and,
- Removal of subsurface components within 12' of grade surface.

Concrete generated during demolition of this area may be processed and used backfill for the prepared cooling tower basin (discussed below).

1.2.1.3 The Power Block

The Power Block is comprised of Units 1 and 2, which are both identical in construction, operation and associated features, components and structures.

Each unit is situated within a multi-story concrete and steel structure that covers approximately 76,000 SF per unit. The structure consists of steel girders and beams, and poured reinforced concrete slab, pedestals and foundations.

Units 1 and 2 generated electricity through the use of GE MS7001(H) two-gas combustion turbines and one steam turbine configuration. Each combustion turbine is equipped with dry, low oxides of nitrogen (NOx) combustors, a heat recovery steam generator (HRSG), condenser, and a deaerating surface condenser. Each HRSG unit has a single 195-foot exhaust stack.



IEEC Units 1 and 2

Additional equipment includes an auxiliary boiler, a 2,000 kilowatt (kW) diesel emergency generator, excitation

transformer, generator step up (GSU) transformer, and unit auxiliary transformer. All but the GSU and auxiliary transformers, along with any associated items to remain will be removed during Silverado's work.

Silverado's work in this area includes:

- Demolish the entire above-grade structure including steel support structure and associated electrical components, building and contents (less certain assets).
- Demolish the concrete superstructure, equipment pedestals, and turbine deck.





- Remove all associated systems, piping, electrical, controls, foundations/supports, and appurtenances and components.
- Remove subsurface components within 12' of grade surface outside power block slab, and grout plug and cap floor drains.
- Demolish power block slabs to remove the top 4 inches of concrete and reinforcing materials and leave in "rough" condition. Flush cut or remove any exposed, protruding features to match final slab surface.

1.2.1.4 Administration/Water Treatment Area

The Administration/Water Treatment Area is an operational area that covers approximately 129,600 SF along the western side of the property. This area includes the administration/control building, the water treatment building, firewater storage tank, diesel and electric fire pump house, demin water tanks, water treatment load center, saturator make up pump, wastewater sump with pumps, and chemical area sump with pumps.

Silverado's work in this area includes:

- Protect-in-place the Administration/Control Building along with the respective internal components, all of which are specifically excluded from demolition.
- Demolish/remove all other structures and features in the area, including slabs, foundation and any sub-slab piping and utilities within 12' of grade surface.
- Remove all structural features including all direct and indirect process-related structures, equipment, piping, pumps, motors, and appurtenances and materials present inclusive of all hazardous and non-hazardous materials.

1.2.1.5 Remove Wiring from Subsurface Ductbanks

Silverado will remove all electrical lines from ductbanks and conduit within its work areas. Certain duct banks will remain for future use; others will be removed in their entirety. Ductbanks to remain will be marked during the Protect-in-Place exercise noted below.

1.2.1.6 Final Grading and Fill Placement

Silverado will backfill areas that are excavated during demolition, or that require fill placement to meet adjacent grade elevations.

Backfill will consist of suitable site material (e.g., crushed concrete), as required. Backfilled areas will include demolition voids from sumps, basins, pipe excavations, conduit and the removal of structures.

Imported material, if needed, will be from approved borrow sites where soil samples have been shown through analytical testing to meet site acceptance criteria.





1.2.2 Features to Remain/Protected in Place

Silverado shall not damage or compromise the integrity of any infrastructure, equipment, materials, or other items not designated in its scope of work. Property, infrastructure and features that are not included in our work will be protected and preserved from damage, including trees, perimeter berms, fences, utilities, storm drains, transformers, building systems, poles or wires for electrical purposes, and features to remain.

The site features and equipment designated to remain in place include the following:

- Facilities
 - Control Room Building and contents
 - Warehouse
 - Water Treatment Building
 - Low Voltage Connections that support the Control Building and Warehouse
 - Sanitary Sewer System
 - Potable Water Supply System
 - Storm Water Drainage System
 - Fire Protection Systems for remaining features
 - Select duct banks
- Equipment
 - 500kV GSUs
 - Unit AUX Transformers
 - 500kV Switchyard, including equipment and spare GSU
 - Fire Pumps diesel, motor-driven and jockey pump
 - Fire Protection Valve House
 - Site Security Equipment, including fencing, cameras, gates

IEEC will identify any sold assets/equipment that are not accounted for on this list.

1.2.3 Demolition Means and Methods

Silverado will use conventional wrecking methods and specialized dismantling techniques at IEEC. Our selected means and methods are subject to controls, restrictions, procedures and limitations identified by our Competent Persons and/or professional Structural Engineers. Such controls and engineering requirements, protections, equipment limitations, etc., will be included in our resultant feature/task-specific work plans and JHAs and related attachments (e.g., Lift Plans, Rigging Plans). Additional details on the work planning process are discussed below (see Section 3).





Demolition activities will be executed in a controlled, methodical manner once all planning, testing, engineering, preparations, controls and protections are in place. Silverado may opt to use a variety of demolition means and methods based on the conditions of the assets/facility once the IEEC auction/sale is complete, and we mobilize to the site.

Means and methods may include conventional demolition methods, including top down and mass wrecking demolition procedures, mechanical failure mechanisms that cause collapse by gravitational loads., or top down crane/tool combinations. All methods will be subject to review/approval by Competent Persons, with the resulting means and methods documented in the related work plan and corresponding JHAs, and applicable rigging plans, critical lift plans, as appropriate.

Note that our demolition means and methods are subject to change based on ongoing inspections by our Competent Persons. If such changes occur, the associated work plan and/or JHAs will be revised and updated to address changed conditions.

The work we perform is inherently dangerous. Significant precautions are taken to ensure the safety and security of all personnel Task-specific work plans and JHAs codify these precautions and specify the requirements for safe working conditions and execution.

The precautions to safeguard people and to plan the task correctly include, but are not limited to:

- Engineering Surveys and Work Plans will be developed by competent persons in their respective disciplines.
- Utilities will be located, including overhead power sources. Utilities such as electric, gas, water, steam, sewer or other service lines will be shut off, capped or otherwise controlled prior to work.
- Worker Protections will be in place.
- An Emergency Response Plan will be in place, including contact and coordination with police and fire.
- Fire Prevention Plan will be in place.
- A Security Plan will be in place to control access to the work areas, as well as localized work zones and fall zone.
- Pre-felling preparations will be complete and in place;

With all planning documents complete and approved, Silverado will commence with demolition.





2.0 Work Sequencing

Silverado will implement the work at IEEC in the general sequence discussed throughout this section, and as shown in the baseline schedule provided in Attachment A. Note that many of our activities may be conducted concurrently as illustrated on the schedule.

2.1 Work by IEEC/Others

Silverado's work sequencing and schedule is predicated on the completion of certain activities/pre-requisite tasks that are performed by IEEC/Others. These activities are summarized on Table 2-1 following.

Table 2-1 Work Sequencing and Completion by IEEC/Others Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California **Work Sequence Work Features Included Notes** Work by IEEC/Others · Notice of Intent (NOI), preparation of a project specific Storm Water Pollution Prevention Plan (SWPPP) and installation of initial BMPs. · Identification, removal, draining, packaging, labeling, handling and disposal of all hazardous materials, universal and hazardous wastes. · Isolation, disconnection, transportation and staging of on-site equipment components scheduled to be decommissioned and stored on-site. · Safe store activities associated with decommissioned equipment scheduled to remain in place: · Isolation, disconnection, rigging, off-site transport any equipment components sold for off-site liquidation/reuse: · Identification, tagging and labeling of utility systems required for continued operation of remaining "BESS" infrastructure; · Coordination of the natural gas supply shutoff with SoCal Gas Company, installation of a blank on the supply line. · Purging of fuel gas from fuel gas supply line that runs from knock-out and filtration skid through the bypass station and gas compressors to Units 1, 2 and the auxiliary boiler; • Disconnect and de-energize the IEEC facility from the switchyard. · Electrical service supporting the admin/control buildings will remain active and maintained by IEEC. · IEEC will label cabling within subsurface concrete duct banks that support lower voltage station or standby service, or that needs to remain in support for future "BESS" operations. · Utilities including the natural gas, recycled water and non-reclaim waste water will be disconnected by IEEC, and the facility will remain connected to the potable water and sanitary and storm sewer system.





2.2 Work by Silverado

Silverado's general activities include pre-construction activities, site preparations and pre-requisite tasks or preparations, followed by decontamination, demolition, and site grading. Table 2-2 summarizes our general order of activities.

Table 2-2		
Silverado Contractors, Inc., Work Sequencing Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California		а
Work Sequence	Work Features Included	Notes
Pre-Construction Activities	Notice of Award Contract Review and Signature Safe Start Meeting	
Notifications, Permitting, Mobilization, Site Preparations, Initial Project Submittals	Regulatory Notifications Permitting Preparation and Delivery of Submittals Background Checks/Clearances/Drug Testing Pre-Construction Kickoff Meetings Safety Orientations	See Table 2-3 for list of Silverado and Client-required submittals.
Mobilization	Mobilize temporary facilities, equipment and personnel.	Initiate activities with approved work plans, JHAs, pre- work submittals.
Site Conditions Assessment/Pre-Work Surveys/Inspection	Evaluate changes to the site resulting from auction activities. Revise approach or schedule, as needed. Evaluate potential hazards, develop controls to prevent hazards, premature collapse, fire, or other conditions. Evaluate presence of any remaining universal wastes, address any new suspect conditions or materials. Inspect and confirm all generating and support systems and areas have been cleaned by IEEC and that the work can safely commence. Identify and confirm utility status/condition, verify protections and isolations are complete by IEEC and it is safe for SCI to proceed. Confirm IEEC has completed draining and removal of free flowing residuals from all lines and tanks sufficient to allow SCI work to proceed.	Notify IEEC of any changes to conditions, implications to schedule, means or methods.
Site Preparations	Install Temporary Facilities and Controls, Engineering Controls, Install erosion and sediment BMPs in SCI work areas, . Establish Security Controls.	





Table 2-2

Silverado Contractors, Inc., Work Sequencing

Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California

Work Sequence	Work Features Included	Notes
Protect in Place	Implement Protect in Place (PIP) measures on protected infrastructure or features.	
Pre-Work Testing/ Profiling/Surveying	Perform pre-work sampling and/or waste profiling/classification, negative exposure assessments, conduct conditions assessments and engineering surveys, utility assessments/isolation confirmations, verify assets released for demolition.	
Construction	Decontamination, Demolition, Concrete Processing, Material Handling, Salvage/Recycling, Waste Management, Transport and Disposal, Backfill, Grading Compaction,.	
Prerequisites	Clearances/Asset Released for DemolitionEngineering Surveys, Work Plans and JHAs	
Demolition Activities	Demolition of Cooling Tower Area	
	Demolition of Operational Courtyard Area	
	Demolition of Unit 2	
	Demolition of Unit 1	
	Demolition of Admin/Control/Water Treatment Area	
	Remove Electrical Wiring from Subsurface Duct Banks	
	Final Cleanup, Restoration and Grading	
Substantial Completion	Perform inspections, develop punch-lists, obtain completion concurrence and approvals.	
Demobilization	Remove final equipment, temporary facilities and personnel from site.	
Project Closeout	Provide final project documentation, as-builts, submit application for final payment.	





2.3 Project Submittals

Silverado will provide various project submittals summarized on Table 2-3 below.

Many project submittals are comprised of programmatic plans that describe the certain project requirements, safety and/or quality controls, regulatory requirements, and company or client policies and procedures. Our individual task-specific work plans and corresponding JHAs shall include the measures necessary to meet the requirements of such submittals.

Table 2-3 Silverado Contractors, Inc., Project Submittals Directory Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California Submittal Title/Description No. **Submission Schedule** Initial Baseline Schedule Prior to mobilization Silverado Licensing and Registrations · Contractor's License, DOSH Certificate Prior to mobilization DIR Registration Cal-OSHA Annual Permit—Trenching and ExcavationCal-OSHA Annual Permit—Demolition of Structures > 36' City of Menifee Business License Prior to mobilization Landfill Licensing for Planned Facilities To be provided when waste · License to Operate classification/profiling complete · Scale Certification and waste acceptance verified Analytical Laboratory Certifications Prior to sample shipment City of Menifee—Demolition Permit Prior to demolition activities Riverside County—Demolition Permit Prior to demolition activities, and · Waste Recycling Plan (WRP) - Form B at project close (Form C) · Waste Reporting Form - Form C. Riverside County-Grading Permit If needed SCAQMD Notification 10 Days before start of field work 24 Hours before start of field Cal-OSHA Notification activities Dig Alert Notification/Number 72 Hours prior to start of work FAA Notification -Form 7460-1 45 Days before stack removal





Table 2-3

Silverado Contractors, Inc., Project Submittals Directory

Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California

No.	Submittal Title/Description	Submission Schedule
	CARB PERP Permits to Operate	Records to be maintained on site
	Staff Records Training Records Drug Screen Records/Clearance Emergency Contact List	Prior to mobilization
	Decontamination and Demolition Activity Work Plan	This submittal, with task-specific work plans and JHAs two week prior to tasks.
	Site-Specific Health and Safety Plan	Prior to mobilization
	Task-Specific Work Plans/JHAs	Two weeks prior to tasks
	Safety Data Sheets	Prior to material mobilization
	Subcontractor List	Prior to mobilization, updated as necessary
	Contingency Plan	Prior to mobilization
	Dust Suppression Plan	Prior to mobilization
	Traffic Management Plan and Haul Route	Prior to mobilization
	Excavation and Structural Support Plan	Two weeks prior to relevant tasks (with work plans/JHAs)
	Fire Prevention Plan	Prior to mobilization
	Waste Management Plan	Updated Weekly
	Internal Site Security Plan	Prior to Mobilization
	Tickets/Material Disposition Records/Waste Manifests	Weekly
	Certificates/Ready for Demolition Tanks and Lines Free of Residual Liquids Utility Severance, Clearances Verified	Prior to demolition activities (with work plans/JHAs)





Table 2-3

Silverado Contractors, Inc., Project Submittals Directory

Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California

No.	Submittal Title/Description	Submission Schedule
	Rigging Plans	Two weeks prior to relevant tasks (included as part of Work Plan/JHA).
	Grout Mix Design	Two weeks prior to related tasks
	Clean Soil Documentation	Two weeks prior to import from borrow site.
	Administrative Documents	
	Project Electronic File Directory	Prior to mobilization, updated regularly.
	Draft Schedule of Values	Prior to mobilization
	Project Daily Log	Within 30 days of project completion
	Certificate of Substantial Completion	At completion of major milestones per SOV
	Punchlist/Completion Forms	When completed, before project completion.
	Official Warranty	Project Close
	Fee Payment Copies	Project Close
	Copies of Contractor Notifications	Project Close
	Copies of Contractor Regulatory Permits	Project Close
	Recycling and Disposal Records	Project Close





IEEC will provide the following project submittals to Silverado as noted on Table 2-4 below.

Table 2-4 IEEC., Project Submittals Directory Inland Empire Energy Company, LLC (IEEC) Demolition of Inland Empire Energy Center, Menifee, California		
No. Submittal Title/Description Schedul		Schedule
	Asbestos Survey	Prior to filing for demolition permits and SCAQMD notices
	Universal Waste Survey and Confirmation of Removals	
	NPDES Notice of Intent	60 Days prior to Silverado
	Storm Water Permit	mobilization
	Storm Water Pollution Prevention Plan	
	Identify and Label all Sold Assets/Items	NLT 2/2/8/20
	Provide Sold Assets Items List with Weights	NLT 3/6/20

2.3.1 As Paperless as Possible

Silverado continually adopts methods and techniques to create value and lessen impacts on the environment. One way we enhance our sustainable work practices is to manage our submittals using an "as paperless as possible"approach. Such approach has substantial benefits for our overall productivity and reduces administrative costs for us and for our clients.

Going as paperless as possible reduces our direct impact on the environment, and also creates opportunities for accessing, storing, and securing project documents. Silverado will use electronic means as much as possible whereby project information is uploaded, stored and made available to authorized project users over a network connection.

Project submittals and ongoing construction management, reporting, administration and invoicing documents shall be uploaded and made available throughout the course of the work. Silverado will work with IEEC to make access to project documents as easy and as intuitive as possible, using a *Project Electronic File Directory* as guide.





3.0 The Silverado Work Planning Process

Silverado's work planning process provides direction, reduces the risks of uncertainty, facilitates decision making, and establishes standards for controls. We strive to develop plans and implement processes that not only meet project requirements, but that result in specific outputs that support safe delivery where it matters most <u>- at the field level</u>.

Silverado will prepare programmatic and task-specific work plans to execute and control its work at IEEC as described in the following sections.

3.1 Health and Safety Plan (HASP)

Silverado's project-specific HASP serves as the initial tool in which we communicate our overall safety-related measures and controls to our work force so they understand the conditions that affect their health, safety and welfare. The safety standards in the HASP include those recommended by the National Demolition Association and the American National Standards Institute for Construction and Demolition.

The key elements of the HASP include:

- Information for managing risks by applying the principles of prevention
- Duties of personnel to cooperate and communicate on all matters of safety
- Information, instruction, training and supervision necessary to carry out work in ways that secures health and safety
- Guidance on actions that may impact others
- Project-specific safety requirements
- Emergency Response Actions
- *Identification of hazards and controls*

As discussed in further detail below, specific safety expectations are communicated down to the task level through individual, task-specific work plans and corresponding Job Hazard Analysis forms (JHAs). The JHA process takes the higher-level requirements of the HASP and pares these down to the task level so that we can identify and communicate hazards directly to the personnel responsible to physically deliver the work.

3.2 Planning the Work

Silverado uses detailed task-specific work plans and corresponding JHAs to communicate our work to the task level. These work plans are sufficiently detailed to allow the IEEC to verify and confirm *before our work starts* that our means and methods are in accordance with all requirements, including sequencing and coordination requirements, release authorizations and clearances, and of course, applicable safety, engineering and regulatory requirements.





3.2.1 Pre-Work Assessments and Surveys by Competent Persons

The first steps in developing task-specific work plans and JHAs are the completion of a comprehensive pre-work site conditions assessment and the formal engineering surveys that are conducted by qualified, Competent Person(s). The assessments and engineering surveys allow us to evaluate potential hazards and to develop the specific controls to prevent premature collapse, fire, or other conditions that may be identified.

The assessment and engineering survey findings will be incorporated into our work preparations, equipment selection, work means, methods and controls, and documented in the subsequent task-specific work plans/JHAs. Topics addressed as a function of the assessment and engineering survey include, but are not limited to:

- Feature or building characteristics, construction type, structure size, framing type, number of stories or height, structural hazards.
- Party-walls, wall ties, adjacent structures and related protections
- Demolition sequencing, demolition means and methods/limitations, hold points
- Bracing/Shoring
- · Load Plans
- Access/egress plans, evacuation routes, muster points, emergency planning.
- Wall opening/access portals for equipment, personnel, debris management.
- Worker or public protections/systems
- Ventilation, illumination controls
- Unsecured Hazard Controls/Protections
- Hazardous materials and combustibles handling, staging, removals
- Utilities and related protections for electric, gas, water, sewer, communication lines.
- Protect in place requirements/controls.
- Hoisting equipment/limitations
- Locations of pits or open holes/barricade requirements/protections.
- Locations of suspect materials or conditions
- Work progression inspection protocols/hold points.
- Emergency planning, access/egress, evaluation routes, rally points, signage

3.2.2 Task-Specific Work Plans

The HASP, assessment and engineering survey findings, and various other project documents, along with ongoing planning and coordination activities, culminate into the individual. task-specific work plans that we develop for our work activities. These work plans describe the tasks





in detail, the controls in place for the task, the limitations and safety hazards associated with the task, and the required prerequisite activities, authorizations, clearances and releases that must be completed or in place prior to the start of the work.

Work plans are prepared by qualified persons with the ability to verify that the work plans address applicable regulatory and project compliance requirements. The plans will undergo appropriate, internal technical review to to ensure that the assumptions used to prepared the plans are aligned with the work, and that the associated means, methods, and procedures are commensurate with the work. When required, work plans will be signed and stamped (e.g., Professional Engineer).

3.2.3 Job Hazard Analysis (JHAs)

Safety expectations are communicated using various program, project and task-specific work plans as noted previously. The JHA process takes the higher-level requirements from such documents and pares requirements down to the task level so that we can identify and communicate hazards to the personnel responsible to physically deliver the work. If applicable, JHAs are supplemented with added critical lift plans, rigging plans, or other material plans resulting from the pre-work assessment and/or engineering survey.

The JHA focus on those elements of the work that, if left uncontrolled, could result in an injury, illness, or damages. Identifying potential hazards and eliminating or controlling them will help prevent such harm.

The JHA focuses on the relationship between workers, the task, the tools and the work environment specific to that task. Once identified, controls to mitigate the identified hazards are implemented to eliminate the risks or reduce them to an acceptable level.

The JHA is reviewed and signed by applicable personnel, and reviewed at every tailgate meeting. Material changes to the work or any condition will require an update to the JHA, which is then communicated to personnel accordingly. Communication during our daily tailgate safety meeting is in English and in Spanish.

Note that all work means and methods are subject to controls, restrictions, procedures and limitations identified by our Competent Persons. Selected means and methods and controls are subject to change based on ongoing inspections conducted by our Competent Persons. If such changes occur, the associated work plan and/or JHAs will be revised and updated to address changed conditions.

When all prerequisite tasks are complete and appropriate work plans, JHAs and authorizations are in place, construction activities will commence. Activities may be ongoing in multiple locations simultaneously (see Attachment A, Schedule)

3.3 Other Project Plans

Silverado's work is subject to various project requirements as outlined in supplement project plans. Where applicable, specific requirements of these plans are incorporated into the task-specific work plans and/or JHAs, as applicable.





3.3.1 Contingency Plan

The intent of a *Contingency Plan* (the Plan) is to address the handling and management of unanticipated contaminants or conditions that may be encountered during the work, particularly during subsurface related activities. It appears unlikely that unanticipated wastes or contaminated soils will be encountered at IEEC based on the history of the site and previous investigations.

If such materials or conditions are encountered, these must be addressed in a controlled manner that is consistent with company and regulatory safety policies. Further, such materials must be managed in accordance with various statutes, rules, regulations and guidance from regulating bodies, as applicable.

In the event that an unanticipated wastes or conditions or impacted soil are encountered during its work, Silverado will stop work until a Competent Person can evaluate the appropriate next steps or directives associated with the work, and address any immediate health and safety implications. If appropriate, an exclusion zone will be designated around the area of concern using flagging, caution tape, or fencing, as appropriate. Work will only be allowed in this zone by persons properly trained and certified in hazardous waste operations (e.g., HAZWOPER).

Silverado will consult with IEEC to determine appropriate next steps to mitigate site safety concerns, and to authorize and implement an action plan commensurate with the conditions and regulatory requirements.

3.3.1.1 Recognizing Potential Areas of Concern

The following occurrences may be signs that hazardous materials have been encountered at the Site during the subsurface activities:

- Strong or unusual chemical odors of solvents, petroleum, etc. from the excavation;
- Encountering suspected industrial waste such as tars, sludges, semi-solids, powders, resins or liquids in the excavation;
- Encountering suspected ACM material;
- Discolored soils in or from the excavation;
- Drums and/or containers (labeled or unlabeled), buried metal objects such as cans, jars or tanks in the excavation; or
- Persons who suddenly become ill.

If any of the above takes place, all work proximate to the area of concern will be suspended pending further evaluation.

As appropriate, Silverado will immediately assess the condition using available field instrumentation, personal protective equipment, and his/her own knowledge and experience to determine the nature of the material and whether materials should be segregated, cordoned off, and work suspended until a formal action plan is in place.





3.3.1.2 Inspections

Disturbed areas will be inspected during the course of excavation, with heightened awareness for for the presence of:

- Stained soils and/or soils exhibiting strong or unusual odors,
- Demolition debris or general refuse,
- Free product, sludge or oils
- Underground Storage Tanks (USTs) or other sub grade features
- Barrels
- Electrical transformers
- Creosote timbers
- Car batteries
- Oil filters
- Waste tires
- Suspect ACM
- Other unusual fill material.

If the above items are identified during excavation, the material will be segregated based on waste type. Additional discussion on segregation and screening procedures is discussed below.

3.3.2 Dust Control Plan

Silverado' will implement engineering and administrative controls to prevent fugitive dust or particular matter emissions as described in the project-specific *Dust Control Plan* (DCP). The DCP addresses controls for construction and demolition, materials handling, paved roads, unpaved roads, and stockpiles, and record keeping requirements in accordance with the South Coast Air Quality Management District (SCAQMD) Rule 403.

The DCP will be submitted prior to mobilization under separate cover.

3.3.3 Traffic Management Plan

Silverado has prepared a project-specific *Traffic Management Plan* (TMP) that defines the safety precautions and controls that will be used to control the movement of traffic and pedestrians, secure parking, work, and delivery areas, communicate on and off-site haul routes, and provide traffic-related protections of all persons working on site.

The TMP will be submitted prior to mobilization under separate cover.





3.3.4 Excavation and Structural Support Plans

Task-specific work plans and JHAs may be supplemented with an *Excavation and Structural Support Plan*, which expands related safety controls, approvals, inspection and documentation requirements related to trenches and excavations.

A overview of our project-specific excavation and structural support plan and related template is provided.

3.3.5 Fire Prevention Plan (FPP)

A project-specific *Fire Prevention Plan* identifies major fire hazards, the proper handling and storage procedures for hazardous materials, potential ignition sources and controls, and the types of fire protection equipment or protocols to address such hazards. The plan further instructs personnel on the protocols to follow in the event of a fire incident, including protocols for emergency actions.

The FPP will be submitted prior to mobilization under separate cover.

3.3.6 Waste Management Plan (WMP)

Silverado is committed to recycling material and salvageable assets. However, some wastes inevitably will be generated during the course of our work. This waste is subject to procedures for managing the characterization/profiling, handling and disposal of construction and demolition debris (C&D), and non-hazardous and hazardous wastes that may be encountered.

Silverado's Waste Management Plan (WMP) will be provided prior to the start of any demolition or recycling activities. The plan may be revised and updated based on conditions resulting from IEEC's auction/asset sale.

3.3.7 Internal Site Security Plan

Silverado intends to use existing fencing/access features at the site to control site access and to protect salvaged assets. Signs and hard barricades will be used, where appropriate, to guide asset buyers and/or transporters.

Work areas will be secured using access restriction, fencing and barricading, as necessary, and assets will be secured in accordance with our demolition plan and schedule.

Some assets may be sold wholesale, and be rigged and lifted onto transport platforms directly, or staged in secured areas for further processing, sizing and/or salvage.

Protections and controls for dismantling, demolition, processing and staging will be outlined in task-specific work plans and JHAs.

3.3.8 OSHA Pre-Demolition Survey

As described above, formal engineering surveys will be conducted by Competent Persons in accordance with Safety and Health Regulations for Construction, 29 CFR 1926.850. The





engineering surveys are the primary tools used to prepare our task-specific work plans and corresponding JHAs.

The engineering surveys are vital to evaluate potential hazards, and to develop the specific controls to prevent premature collapse, fire, or other hazard conditions that may be identified during the survey. In addition, the survey confirms the status of various utilities such as electric, gas, water, steam, sewer, and other service lines that must be shut off, capped, or otherwise controlled outside the building line before demolition is started. Further, the survey verifies that related utility companies are involved, engaged and have actively participated in the utility management process.

3.3.9 Certification of Lines/Tanks Free of Liquids

Silverado will provide written certification that lines, tanks or other features are clear of free-flowing residual fluids prior to demolition.

3.3.10 Certification of Severance of Utilities

Silverado will provide written certification that utilities are severed, isolated or otherwise protected in place, and that demolition can commence.

3.3.11 Rigging Plans

Rigging and lift plans are most often prepared by the Competent Person/Supervisor in charge of the lift, or by a Competent Person in charge of the hoisting and rigging. These individuals are most often subcontractors hired to provide crane and rigging services. Rigging or Lift Plans are incorporated into Silverado's task-specific work plans and corresponding JHAs. Silverado's Competent Person further reviews those of the crane and rigging subcontractor to ensure all appropriate steps are taken to plan and communicate rigging/lifting requirements. Any deviations from an approved Plan must be reviewed by the original approver.

Example Rigging/Lift plans will be provided for review in advance of lifts.

3.3.12 Grout Mix Designs

Silverado will submit grout mix specifications for approval in advance of any applicable grouting/slurry activities. Approved materials and placement will be incorporated into associated work plans.

3.3.13 Clean Soil Import/Borrow Site

If needed, soils imported for use as fill material will be subject to geotechnical and sampling and analytical testing to demonstrate the material is suitable for use as backfill, and is clear of deleterious materials and/or contaminants. Such characterization will take place well in advance of import activities to secure sufficient material and IEEC approval of the proposed soil borrow site.





3.4 Substantial Completion

When Silverado completes specific activities, it will request confirmation by IEEC and secure agreement that our work obligations associated with that activity are complete. Confirmation is secured after walk down and inspection conducted together by Silverado and IEEC representatives.

If, during the inspection it is determined that the work is complete, Silverado will fill a Certificate of Substantial Completion, and release that portion of the work back to IEEC and process any final related progress billings associated with that activity.

If, during the inspection it is determined there are remaining actions necessary to complete the work, a "punchlist" shall be prepared that specifies any outstanding actions that must be completed before a final certificate is issued. A final walk down is completed to demonstrate all punchlist items are complete, and authorization is given to proceed in filing the Certificate of Substantial Completion for that specific activity.

3.5 Demobilization

When all work is complete and there are no outstanding punchlist items, work will be considered complete and final demobilization activities will commence.

Silverado will closeout the project by submitting all final closeout documents, final applications for payment and a Certificate of Final Completion.





5.0 Project Management and Administration

Administration will fall to our designated Project Manager, SSO, and Site Superintendents, with support and oversight from our executive management team.

All activities performed are subject to review by our independent, senior-level personnel who understand the various aspects of the project, but who may not be directly involved in the day-to-day project operations (Project Executive, Quality Assurance Manager, Corporate Safety Director, etc). This provides objective, third party internal review of our activities for compliance with our scope of work, implementation of appropriate health and safety procedures or technical applications, and overall risk and liability management.

Meetings are instrumental in managing and administering the project, but should be target and focused to maximize effectiveness.

5.1 Progress Meetings

Progress meetings are regularly scheduled to exchange information about work status, and to communicate information on schedule, budget, changes, safety or quality concerns. Progress meetings are further used to identify delivery concerns and to ensure we are satisfying and meeting the needs of IEEC.

Effective progress meetings benefit the entire delivery process, providing:

- Timely task updates
- A venue for recognizing milestone achievements
- Proactive solutions to pending problems or concerns that if addressed early, avoid escalation

Silverado will work with IEEC to develop a progress meeting schedule and related procedures that result in:

- Focused, simplified and effective meeting agendas
- Effective time management protocols
- Concise, balanced input from project team members
- Effective handling and closure of action items from prior meetings.

5.1.1 Monthly Meetings

Monthly meetings may be held to review our work progress, to address issues or that may be identified, to establish a 90-day look ahead, and to address any other relevant matters.

Monthly Meeting attendees from SCI include, but are not limited to:

- Project Executive
- Project Manager





- Superintendent(s)
- Site Safety Officer

5.1.2 Weekly Meetings

Weekly meetings will be held to discuss safety and schedule and any other aspects of the project. Silverado's attendees will include our Project Manager, General Superintendent, and Safety Manager.

5.2 Plan of Day/Coordination Meetings

Silverado's Plan of the Day (or Plan of Next Day) meetings are conducted daily. This meeting includes a review of the schedule and work progress and plan for the work of the day (or next day, if preferred). Silverado's attendees include the PM, Superintendent(s), and Site Safety Officer.

The purpose of the meeting is to review the schedule plan and progress, safety and quality concerns, site conditions, coordination, and pending work approvals. This meeting may further include "look-ahead" discussions and planning and coordination.

If required, additional focused meetings may be conducted daily during critical demolition tasks. The purpose of such meetings is to ensure that all project subcontractors are up to speed on all critical daily activities, safety issues, and other topics of importance.

5.2.1 Plan of Day—Reviews/Approvals

A key element of our approach is our work plan and JHA process. These documents will be prepared in advance for IEEC review, input and approval.

This process is collaborative, and intended to demonstrate all work is planned, controlled and commensurate with delivery requirements. We recommend that the agenda for the Plan of Day meeting include time specifically set aside to review pending plans so that work can proceed as smoothly as possible to maintain schedule.

5.2.2 Safety Meetings

Various safety meetings will be conducted throughout the course of the project. These meetings are outlined in the HASP.

5.3 Reporting

Silverado compiles various internal and external reports as part of the project record, which may include those listed as follows.

5.3.1 Daily Force and Equipment Report

Daily Force and Equipment Reports identify the following information:

• Craft Type and Total (Silverado and Subcontractors)





- Project Personnel Total
- Major Equipment
- Shift Expectations
- Other Pertinent Remarks

5.3.2 Shift Report

Shift Reports—Effective the first day of mobilization, Silverado compiles shift reports that cover workforces present on site.

5.3.3 Weekly Status Reports

Weekly Status Reports—Each week, Silverado prepares a comprehensive status report. The report includes key work accomplished in the current week and a list of key work items planned for the following week.

In addition, the weekly status report may include, as applicable:

- Look-ahead discussions
- Safety Inspections
- Material Characterization and Classification Information
- Waste/Recycled Materials Information
 - · Waste Manifests,
 - Trip Tickets,
 - Material Recycling Logs/Disposition Records

5.3.4 Monthly Progress Report

By the fifth day of each month beginning the month after contract award, Silverado will prepare its report of progress for all work included in our scope of work. This comprehensive report will include the following information:

- Progress Narratives
- Safety Update
- Schedule Update
- Schedule of Values
- Work Change Requests (WCR) Log and Status Report
- Monthly Safety Reports indicating hours worked, incidents, observations, safety inspection results, audits.
- Problems/Needs





- Demolition Status Updates to include:
- Invoice Status
- Deliverable and Submittal Status
- Progress Photos

5.3.5 Work Schedules and Updates

Silverado has included a baseline, milestone-based schedule in Attachment A. As part of our ongoing administration of the work, we will use this baseline to monitor work progress.

In the event there is an unexpected event or discovery that puts our work behind schedule to the extent that critical path activities or milestone dates are at risk, we will present a recovery plan that identifies the efforts we will undertake to get work back on track/schedule. We will further evaluate the event or discovery to determine its root cause, and implement mitigation measures so the problem does not occur again in the future.

5.4 Applications for Payment

Silverado will issue its Application for Payment and related attachments, releases, waivers and certifications in accordance with the scheduled reviews, guidelines and specifications.

5.5 Project Closeout Documents

Silverado will provide the following documents as part of its closeout of the project:

- Project Daily Logs
- Warranty
- Fee Payment Copies
- Contractor Notification Copies
- Permit Copies
- Final Waste Disposal Records

5.5 Quality Assurance/Quality Control

The project executive management team, QAM, PM and safety manager(s), shall develop and implement performance and assessment criterion to demonstrate that work is performed safely and in compliance with established project requirements. The quality control/quality assurance process focuses on proactively preventing defects from entering into our project delivery through reviews, audits and inspections.

Inspection, testing, and audit processes, along with related reviews and reporting, will be used to identify corrective actions and the process to mitigate and follow up to verify correction and compliance.



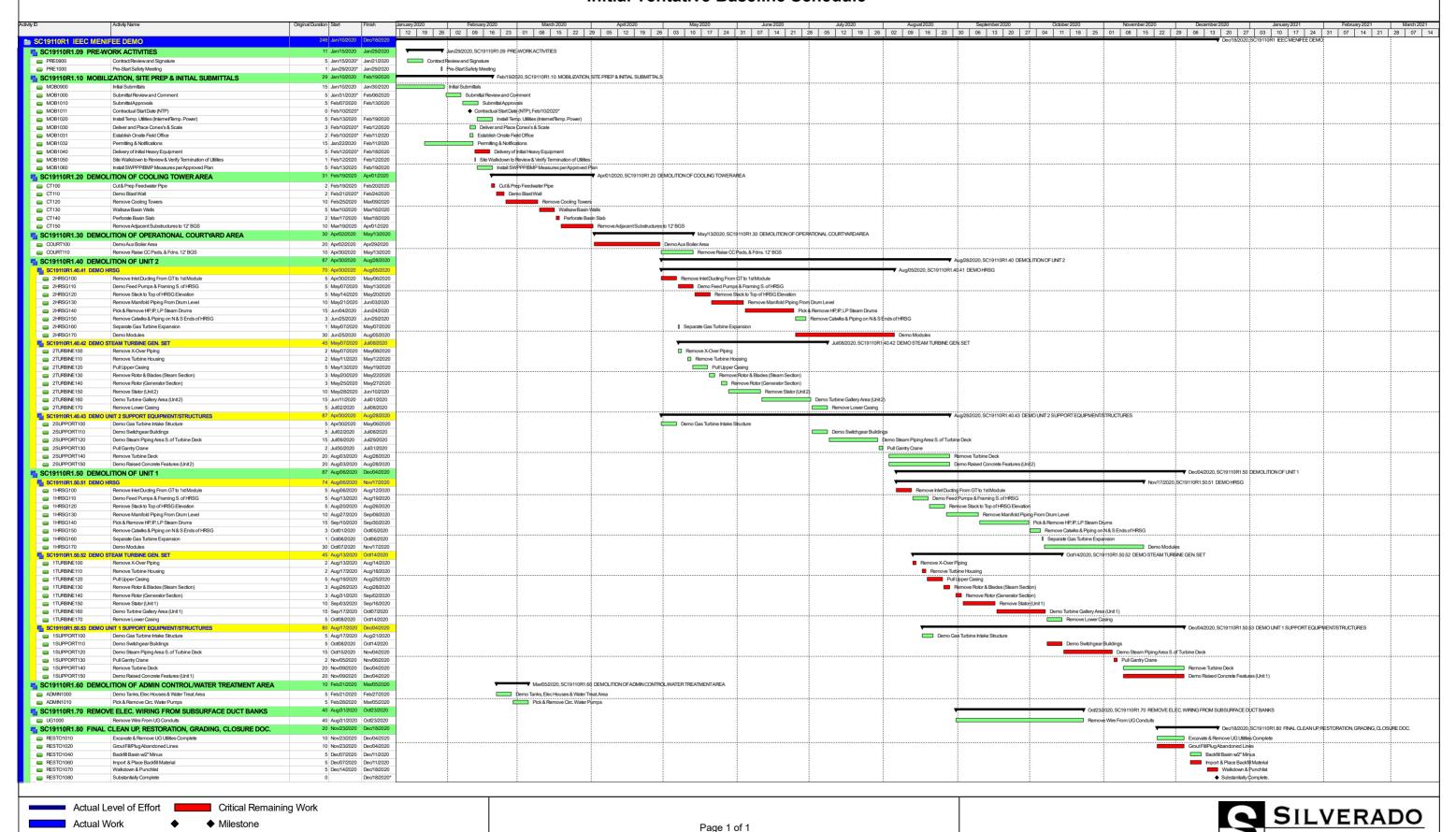


Attachments

Attachment A-Baseline Schedule



IEEC - Inland Empire Energy Center Demolition Initial Tentative Baseline Schedule



Remaining Work

summarv

CONTRACTORS

