State of California
STATE WATER RESOURCES CONTROL BOARD

2018-2019

LUP ANNUAL REPORT

FOR
STORM WATER DISCHARGES ASSOCIATED
WITH CONSTRUCTION ACTIVITIES

Reporting Period July 1, 2018 through June 30, 2019

In compliance with the Construction General Permit (CGP) an annual report is required to be submitted electronically via SMARTS by September 1 of each year. This document must be certified and signed, under penalty of perjury, by the appropriate official of your company.

If you have any questions, please contact your Regional Board Storm Water Permit Contact. The names, telephone numbers and e-mail addresses of the Regional Board contacts, as well as the Regional Board office addresses can be found at http://www.waterboards.ca.gov/waterboards_map.shtml. To find your Regional Board information, match the first digit of your WDID number with the corresponding number that appears in parenthesis on the first line of each Regional Board office.

GENERAL INFORMATION:

A. *Property Owner or Legally Responsible Person Information:*

Site WDID No: N/A

Owner's Name: Topock Phase 1 Construction Contact Person: Carmen Fewless
Physical Address: 3400 Crow Canyon Road e-mail: CRFR@pge.com
City: San Ramon State: CA Zip: 94583 Phone: 925-415-6304

B. *Site Information:*

Site Name: PG&E Topock Compressor Station Contact Person: Curt Russell
Mailing Address:
14553 National Trails Highway e-mail: gcr4@pge.com
City: Needles State: CA Zip: 92363 Phone: 760-791-5884

C. Best Management Practices Plan (BMP Plan)

1. Has a BMP Plan been prepared by a Qualified SWPPP Developer (QSD) for the construction project?

☒ **YES** ☐ **NO**

If **NO**, Explain: Because the PG&E Topock groundwater remedy is part of a CERCLA response action, remedial construction activities conducted onsite are covered under the permit exemption codified in CERCLA Section 121(e)(1). While the permit exemption applies to the administrative or procedural elements (preparing and submitting permit applications and obtaining permits), the substantive requirements of applicable laws remain. In compliance with the Groundwater Final EIR Mitigation Measures HYDRO-1, HYDRO-2, and HYDRO-3, and incorporating the construction general permit updates, PG&E prepared a Best Management Practices (BMP) Plan for groundwater remedy construction activities (C/RAWP, Appendix M). The Topock groundwater remedy construction BMP Plan complies with the substantive requirements of the California and Arizona Construction General Permits, as well as the applicable federal, state, and local permit and regulatory requirements,

2. Does the BMP Plan include a Monitoring & Reporting Program (M&RP) section/element?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

3. Are these documents kept onsite or in a construction vehicle and available upon request?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

D. GOOD SITE MANAGEMENT "HOUSEKEEPING"

1. Were required good site management "housekeeping" measures for construction materials implemented on-site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

a. Were the products used and/or expected to be used identified?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

2. Were required good site management "housekeeping" measures for waste management implemented on-site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

a. Is there a spill response and implementation element of the BMP Plan?

☒ **YES** ☐ **NO**

If **NO**, Explain: The Topock groundwater remedy construction BMP Plan includes a spill response and implementation element

3. Were required good site management "housekeeping" measures for vehicle storage and maintenance implemented on-site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

4. Were required good site management "housekeeping" measures for landscape materials implemented on-site?

☐ **YES** ☐ **NO**

If **NO** Explain : Not Applicable. To date, landscape materials have not been used for Topock groundwater remedy construction

5. Was a list of potential pollutant sources developed?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

6. Were good site management "housekeeping" measures to control air deposition of site materials and from site operations implemented on-site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

E. NON-STORM WATER MANAGEMENT

1. Identify any non-storm water discharges implemented on this project during this reporting year.

__Fire Hydrant Flushing __Irrigation of Vegetative Erosion Control Measures __ Pipe Flushing & Testing

_ Water to Control Dust __ Street Cleaning __Dewatering __Uncontaminated Water from Dewatering

_X_ Other: Topock groundwater remedy wastewater discharges to PG&E Topock Compressor Station Evaporation Ponds in accordance with Board Order No. R7-2018-0022. The discharge does not leave the project boundary.

2. Were measures to control all non-storm water discharges during construction implemented?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

3. Were vehicles washed in such a manner as to prevent non-storm water discharges to surface waters or to MS4 drainage systems?

☐ **YES** ☐ **NO** ☒ **N/A**

If **NO** Explain: _____

4. Were streets cleaned in such a manner as to prevent unauthorized non-storm water discharges from reaching surface waters or MS4 drainage systems?

YES ☐ **NO** ☒ **N/A**

If **NO** Explain: _____

F. EROSION CONTROLS

1. Were required erosion controls implemented on your site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

G. SEDIMENT CONTROLS

1. Were required sediment controls implemented on your site?

☒ **YES** ☐ **NO**

If **NO** Explain: _____

H. RUN-ON AND RUN-OFF CONTROLS

1. Was all site run-on and run-off effectively managed?

☐ **YES** ☒ **NO** ☐ **N/A**

If **NO**, Explain: Run-on from nearby hillside during rain event in December 2018 resulted in track-out of recently graded soil during construction of the entrance road to the Construction Headquarters. Track-out was cleaned up and additional BMPs (rocks and rumble plates) were added.

2. If run-on from the surrounding area is believed to contribute to an exceedance of the NALs or NELs, was this documented and was the run-on monitored?

☐ **YES** ☐ **NO** ☒ **N/A**

If **NO**, Explain: _____

I. INSPECTION, MAINTENANCE AND REPAIR

1. Were all site inspections, maintenance, and repairs performed or supervised by a Qualified SWPPP Practitioner (QSP)?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

2. Were site inspections conducted as required by the CGP?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

3. Do your inspection forms/ checklists meet the minimum criteria listed in the **CGP**?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

4. During any site inspection, were BMP inadequacies noticed?

☒ **YES** (Provide description in **Form 3**) ☐ **NO**

If **NO**, Explain: _____

5. If BMP inadequacies were observed, did BMP repairs/replacement begin within 72 hours?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

6. Were photographs taken of the site before, during, and after every qualifying (third) rain event

☐ **YES** ☐ **NO**

If **NO**, Explain: _____

7. Were the date and rain gauge reading or nearest governmental rain gauge recorded for each qualifying rain event?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

8. Prior to each predicted rain event, were pre-storm event inspections conducted in compliance with the **CGP?**

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

9. Were post rain event inspections conducted?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

10. Are all visual inspection records retained on-site or offsite and available upon request?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

J. WATER QUALITY SAMPLING AND ANALYSIS

1. How many qualifying storm events (producing precipitation of ½ inch or more at the time of discharge) occurred this past reporting year? 9 ☐ **N/A (No qualifying storm events or Type I Project) Skip to next Section.**

2. How many qualifying storm events (producing precipitation of ½ inch or more at the time of discharge) were sampled? _____ ☒ **N/A**

Explain Un-sampled events: Linear Risk Type 1 projects do not require sampling unless there is a non-storm water discharge. No non-storm water discharge occurred during qualifying storm events in this reporting period.

3. For the sampled events, did you collect a minimum of three samples (representative of the flow and characteristics) each day of discharge per qualified storm event?

☐ **YES** ☐ **NO** ☒ **N/A (Type 1 Project)**

If **NO**, Explain: _____

4. Were grab samples analyzed for pH and turbidity? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☒ **N/A (Type 1 Project)**

If **NO**, Explain: _____

5. Were any samples analyzed for Suspended Sediment Concentration (SSC)? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☒ **N/A (Type 1 Project)**

6. Was receiving water monitoring conducted? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☒ **N/A (Type 1 Project)**

7. Were Active Treatment System (ATS) effluent samples taken and submitted in SMARTS? (Applies to projects that deployed ATS)

☐ **YES** ☐ **NO** ☒ **N/A (No ATS used)**

K. NON-VISIBLE POLLUTANT MONITORING

1. Were any breaches, malfunctions, leakages, or spills observed during a visual inspection?

☒ **YES** ☐ **NO** Skip to next Section

2. Were pollutants from any breach, malfunction, failure and/or leak of any BMP cleaned up prior to the next rain event?

☒ **YES (Skip to next Section)** ☐ **NO**

3. For each discharge event (of non-visible pollutants), were samples collected in compliance with the **CGP?** (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☐ **N/A)**

If **NO**, Explain: _____

4. For each discharge event was a comparison sample collected (uncontaminated sample that did not come into contact with the pollutant)? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☐ **N/A**

If **NO**, Explain: _____

L. NAL EXCEEDANCES

1. Were any **Numeric Action Levels (NALs)** exceeded?

   ☐ **YES** ☐ **NO** Skip to next Section ☒ **N/A (Type 1 Project)**

2. Were corrective actions taken to address the NAL exceedances?

   ☐ **YES** ☐ **NO** ☒ **N/A**

   If **NO**, Explain: _____

   If **YES**, please provide information about the corrective actions taken on **Form 3** if a NAL Exceedance Report was not requested by the Regional Water Board**.**

3. Were analytical results from any/all NAL exceedances submitted electronically to the State Water Board?

   ☐ **YES** ☐ **NO** ☒ **N/A**

   If **NO**, Explain: _____

4. Were any NAL Exceedance Reports submitted at the request of the Regional Water Board?

   ☐ **YES** ☐ **NO** ☒ **N/A**

M. NEL EXCEEDANCES

1. Were any **Numeric Effluent Limitations (NELs)** exceeded?

   ☐ **YES** ☐ **NO** Skip to next Section ☒ **N/A (Type 1 or 2 Project)**
   Skip to next Section

2. Were any **NEL** exceedances due to a storm event equal to or larger than the Compliance Storm Event described in the **CGP**? (On-site rain gauge and governmental rain gauge verification required)

   ☐ **YES** ☐ **NO** ☐ **N/A**

   If **YES**, provide the date of the storm event and rain gauge information_____

3. Were corrective actions taken to address the NEL exceedances?

   ☐ **YES** ☐ **NO** ☐ **N/A**

   If **NO**, Explain: _____

   If **YES**, please provide information about the corrective actions taken on **Form 3**

4. Were NEL Violation Reports submitted to the State Water Board within 24 hours after the NEL exceedances were identified?

   ☐ **YES** ☐ **NO** ☐ **N/A**

   If **NO**, Explain: _____

5. Were analytical/sampling results from any/all NEL exceedances submitted electronically to the State Water Board no later than 5 days after the conclusion of the storm event/receipt of the lab results?

☐ **YES** ☐ **NO** ☐ **N/A**

If **NO**, Explain: _____

6. Were subsequent Suspended Sediment Concentration (SSC) analyses conducted? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☐ **N/A (Storm Event > Compliance Storm Event)**

If **NO**, Explain: _____

7. If the project directly discharged to a Receiving Water, were subsequent Receiving Water samples taken and analyzed? (Analytical data must be entered in the **RAW DATA** tab in SMARTS)

☐ **YES** ☐ **NO** ☐ **N/A (Storm Event > Compliance Storm Event)**

If **NO**, Explain: _____

N. TRAINING

1. Was the BMP Plan implemented by a Qualified SWPPP Practitioner (QSP) or a trained person supervised by a QSP?

☒ **YES** ☐ **NO**

If **Yes**, Provide Name and Certificate Number: Scott O'Donnell 26885

If **NO**, Explain: _____

2. Were all individuals conducting BMP installation, inspection, maintenance and repairs trained as required by the CGP?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

3. Are complete training records kept in the BMP Plan and available upon request?

☒ **YES** ☐ **NO**

If **NO**, Explain: _____

ANNUAL REPORT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: Isabella Johannes

Signature: _____ Date: 1 October 2019

Title: Manager

DESCRIPTION OF ANALYTICAL PARAMETERS

The Construction Activities Storm Water General Permit (General Permit) requires you to analyze storm water samples for at least two parameters. These are pH and turbidity. In addition, you must monitor for any other pollutants which you believe to be present in your storm water discharge (i.e. non-visible pollutants) as a result of construction site materials.

pH (required) - is a numeric measure of the hydrogen-ion concentration. The neutral, or acceptable, range is within 6.5 to 8.5 (Numeric Action Level-NAL range). At values less than 6.5, the water is considered acidic; above 8.5 it is considered alkaline or basic. The Numeric Effluent Limitation (NEL) for pH is 6.0-9.0. An example of an acidic substance is vinegar, and an alkaline or basic substance is liquid antacid. Pure rainfall tends to have a pH of a little less than 7. There may be sources of materials or construction activities which could increase or decrease the pH of your storm water discharge.

Turbidity (required) - is the cloudiness of water quantified by the degree to which light traveling through a water column is scattered by the suspended organic and inorganic particles it contains. The turbidity test is reported in Nephelometric Turbidity Units (NTU) or Jackson Turbidity Units (JTU). The NAL for turbidity in this General Permit is 250 NTU. The NEL is 500 NTU

Suspended Sediment Concentration (SSC) - is the measure of the concentration of suspended solid material in a water sample by measuring the dry weight of all of the solid material from a known volume of a collected water sample. Results are reported in mg/L.

Benthic Macroinvertebrate Bioassessment – evaluation of animals without backbones, living in or on sediments or other substrates, of a size large enough to be seen by the unaided eye, and which can be retained by a U.S. Standard No. 30 sieve (28 openings per inch, 0.595-mm openings) to assess the biological conditions (health) of a waterbody.

See Storm Water Contacts at

http://www.waterboards.ca.gov/waterboards_map.shtml

FORM 3-POTENTIAL POLLUTANT SOURCE/CONSTRUCTION ACTIVITY BMP STATUS

Please enter a general summary of any BMP deficiencies identified for each quarter and the corrective actions taken.
Once completed, click the save button.

July – September	**No BMP deficiencies identified between August 28, 2018 and September 30, 2018. Topock groundwater remedy construction activities started on October 2, 2109.**
October - December	**In fourth quarter 2018, BMP deficiencies were recorded involving general maintenance of fiber rolls, plastic drip pans, track-outs, and spill containment. In addition to general maintenance, spill containment was added beneath porta potties at the start of the project. Track-out was also cleaned up and additional BMPs (rocks and rumble plates) were added. All BMP deficiencies were discussed with Construction Management. All BMP deficiency corrections were initiated by the contractor within 72 hours.**
January – March	**In first quarter 2019, BMP deficiencies were recorded involving replacing or repairing silt fencing, fiber rolls, spill containment, and plastic under equipment; covering material bins, pallets, drilling tanks, and stockpiles; emptying trash receptacles; removing sand on fiber rolls; removing rainwater from concrete containment areas; increasing amount of gravel for track-out; and general housekeeping. All BMP deficiencies were discussed with Construction Management. All BMP deficiency corrections were initiated by the contractor within 72 hours. The QSP provided additional training to contractor.**
April – June	**In second quarter 2019, BMP deficiencies were recorded involving replacing or repairing fiber rolls, spill containment, and plastic under equipment; emptying trash receptacles; adding BMPs downstream at the Construction Headquarters; adding stakes to fiber rolls; adding fiber rolls around stockpiles overnight and on the weekend when not active; removing sand on fiber rolls; installing pipe rack and a camlock connection to the valve of a tank for leak prevention redundancy; and general housekeeping. All BMP deficiencies were discussed with Construction Management. All BMP deficiency corrections were initiated by the contractor within 72 hours.**