

Work Variance Request Form

Groundwater Remedy Phase 1 Construction, PG&E Topock Compressor Station, Needles, California

PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT

Work Variance Request #2 – Relocate tie-in point for temporary remedy construction water line

Request Prepared By: PG&E

Date Submitted: 7/31/18

Variance Request No.: 2

Location: New tie-in point is aboveground and inside TCS

Request Approval From: DTSC and DOI

Date Approval Required: August 2018

Map Area: N/A

Landowner/Land Manager: PG&E/HNWR (managed by USFWS) Land Owner Parcel No: 650-161-08/650-161-12

Current Vegetative Cover/Land Use: Minimal along Pipeline 300A access road, none at the new tie-in point inside TCS

Existing Sensitive Resource? ☐ No ☒ Yes, Specify: Palo verde plants along Pipeline 300A , Rout 66 Welcome sign

Variance From: ☐ Mitigation Measure ☐ Work Plan/Procedure ☐ Response to Comments

☒ Drawing ☐ Permit Condition ☐ Other

Detailed Description of Variance and Justification (Attach additional information if necessary):

Attachments: ☐ Photo ☒ Construction Drawing ☐ Aerial Photo Mark-Up ☐ Correspondence ☐ Other

Potential Impacts of Variance:

- | | | |
|---|--|--|
| <input checked="" type="checkbox"/> Air Quality (<i>During construction</i>) | <input type="checkbox"/> Hazardous Materials | <input checked="" type="checkbox"/> Aesthetic (<i>During construction</i>) |
| <input checked="" type="checkbox"/> Biological Resources (<i>Transplant one young palo verde plant along pipeline road</i>) | <input checked="" type="checkbox"/> Noise (<i>During construction</i>) | <input type="checkbox"/> Water Resources |
| <input type="checkbox"/> Soils | <input type="checkbox"/> Paleo Resources | |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Hydrology and Water Quality | |

Description and Justification:

The tie-in point for remedy construction water will be moved to an aboveground location inside PG&E Topock Compressor Station and below the TCS Water Storage Tanks. PG&E proposes this relocation to eliminate the risk of damaging the existing pressurized 6-inch water line and to avoid any interference with PG&E Gas Operations control of the Station's water supply. This work variance request addresses this relocation, specifically:

- 1. Relocate the construction water tie-in point to an aboveground location below the TCS Water Storage Tanks, inside TCS** – The final design calls for the temporary construction water line to hot-tap into the existing 6-inch steel water line just as the line turns southwest to continue to TCS. PG&E proposes to move the tie-in point to an aboveground valve manifold, located below the TCS Water Storage Tanks in the boneyard area (see Detail 2 of Revised Drawing M-10-01).
This relocation reduces the risk of damaging the existing pressurized water supply line and avoids any interference with PG&E Gas Operations control of the Station's water supply. This also simplifies the overall field activity by eliminating the need to coordinate with Southwest Water, the water purveyor. All field work associated with the tie-in will be done aboveground.
- 2. Extend the temporary construction water line to the new tie-in point, along Pipeline 300A access road** – The planned 4-inch HDPE temporary construction water line will be extended, following the route of the Pipeline 300A access road, to the new tie-in point inside TCS. This pipeline extension is approximately 1,950 feet and is also made of 4-inch HDPE (see Revised Drawing C-07-200). The pipe will be laid on ground surface and to the south of the 6-inch water line where possible. At the crossing with SoCal Gas pipeline access road, the pipeline will be at grade with fill to allow for vehicle crossing.

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Groundwater Remedy Phase 1 Construction, PG&E Topock Compressor Station, Needles, California

PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT**Work Variance Request #2 – Relocate tie-in point for temporary remedy construction water line**Approval Signatures: *RAR@PG&E* 7/30/18

PG&E Construction Manager Date

 7/31/18

QA Manager Date

 DOI 08/29/2018

Approving Agency Date

 DTSC 8/29/2018

Approving Agency Date

Future Activity Allowance Determination Matrix for Work Variance Request (WVR)

Work Variance Request No. [2, Relocate tie-in point for temporary remedy construction water line](#)

Date: [August 30, 2018](#)

Future Activity Allowance is an activity that is not considered in the remedy design but necessary to support the project objectives. Future Activity Allowance is a Material Deviation which is defined in the final groundwater remedy design as: Material Deviation means a change or correction required to prevent a condition that would (1) render the approved design non-compliant with codes, regulations, and /or engineering standard of practices, (2) render planned well locations and/or constructions fail to meet the project objectives, (3) cause significant schedule delay, and/or (4) cause a significant increase in costs. (CH2M Hill, 2015)

According to the SEIR Project Description, "The inclusion of the Future Activity Allowance is not intended to account for minor adjustments (work variances) of the remedy design during construction resulting from field conditions. DTSC's objective for the inclusion of the Future Activity Allowance is to consider the potential impacts of needing to take additional but previously unforeseen activities that were not contemplated as part of the Final Remedy Design but are activities that would improve the performance of the remedy, or are necessary to gather additional information on the remedy performance, and/or aid in the transition of the active remedy to monitored natural attenuation." (ESA, 2017)

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1. Are all components of the WVR in the approved final design as reviewed in the SEIR?
☐ Yes ☒ No
 2. Are all components of the WVR staying within an infrastructure alignment in the approved final design?
☒ Yes ☐ No

If answers to both 1 and 2 are Yes, STOP – action is not Future Activity Allowance

3. For components not in approved final design, will the WVR require new access not identified for use in the final design and create new ground disturbance beyond those anticipated in final design?
☐ Yes ☒ No

[There will be new anchors for WVR's proposed above ground water line, but in an approved alignment of the final design that includes intrusive below ground pipelines and utilities.](#)

If answer is No, STOP – action is not Future Activity Allowance. If Yes, proceed...

4. For components not in approved final design and require new access or new ground disturbance, will the ground disturbing activity be outside the 2018 SEIR project boundary?
☐ Yes ☐ No

If answer is Yes, STOP – action is subject to additional CEQA evaluation. WVR approval will be considered after DTSC completes CEQA determination.

5. For WVR requiring new access and/or new ground disturbance, but project components are in approved final design and within the 2018 SEIR project boundary, is the variance necessitated by field conditions which are outside the control of the operator (e.g. refusal during drilling, unstable ground, existing design jeopardizes health and safety, modification to avoid archaeological resource, existing design does not conform to engineering standards, etc.)?

Future Activity Allowance Determination Matrix

WVR No.

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☐ Yes ☐ No

If answer is No or otherwise explained in Section 7 below, action is Future Activity Allowance, follow Communication Protocol for Future Activities Allowance, Exhibit 3 to the Statement of Decision and Resolution of Approval. If the answer is Yes, action is Future Activity Allowance, and DTSC will work with Tribes to meet the time sensitivity of the WVR. Regardless of response, because of new access and/or new ground disturbance, WVR action may be subject to Federal Consultation. Inquire with BLM to determine whether there is a need to follow Consultation during Construction protocol.

6. Does the addition of WVR cause an exceedance from infrastructure limits specified in the 2018 certified Final SEIR (Table 3-1 for well boreholes; Table 3-2 for pipeline trenches, electrical/communication conduit, roadway improvements, or sizes of buildings and structures; Table 3-4 for volume of soil disturbance and Table 3-5 for water usage)?

☐ Yes ☐ No

If answer is Yes, STOP – action is subject to additional CEQA evaluation. WVR approval will be considered after DTSC completes a CEQA checklist to determine if there are new or substantially more significant environmental impacts than disclosed in the 2018 SEIR.

7. Other extenuating circumstances or information for FAA considerations: ☐ No

☐ Yes – provide information and/or justification

Conclusion: WVR No. 2

☒ is not a FAA ☐ is a FAA

Signature of reviewer:



Date: August 30, 2018

Revised Drawings for Work Variance Request #2

Drawings from Approved Final Design (November 2015)



