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 #3 – Proposed changes within the Construction Headquarters (CHQ) fence line

Request Prepared By: PG&E	equest Approval From: DTSC and DOI			
Date Submitted: 12/24/18	Date Approval Required: January 2019			
Variance Request No.: 3	Map Area: N/A			
Location: Construction Headquarters (CHQ)				
Land Manager: BLM Land Owner Parcel No: 650-161-12				
Current Vegetative Cover/Land Use: Minimal vegetation				
Existing Sensitive Resource? 🛛 No 🔲 Yes, Specify: N/A				
Variance From: Mitigation Measure Work Plan/P	rocedure Response to Comments			
X Drawing Permit Condition	Other			
Detailed Description of Variance and Justification (Attach additional information if necessary):				
Attachments: Photo X Construction Drawing Aeria	al Photo Mark-Up Correspondence Other			
Potential Impacts of Variance:				
Air Quality Hazardous Materia	ls X Aesthetic			
☐ Biological Resources ☐ Noise	Water Resources			
Soils Paleo Resources				
☐ Cultural Resources ☐ Hydrology and Wat	er Quality			

Description and Justification:

This Work Variance Request addresses proposed changes within the CHQ fence line to avoid/minimize the overall amount of soil disturbance during construction, reduce the number of truck trips to haul wastewater, and allow for additional working space within the yard. There are no proposed changes to the CHQ footprint nor its fence line. The specifics are described below and included in the attached drawings.

- a) Relocate the decontamination pad from the western fence to the northern fence (near the western corner).

 Based on recent survey data collected during construction, the difference in ground elevation between northern and southern end of the pad is about 4 feet. Moving the pad to the northern fence would eliminate the difference in ground elevation and reduce the amount of soil disturbance by at least 80 cubic yards.
- b) Bring the remedy-produced wastewater tank from belowground to aboveground, increase the tank volume from 1,000 to 2,500 gallons, and place the aboveground, double-walled tank adjacent to the decontamination pad. The change from belowground to aboveground reduces the amount of soil disturbance by at least 50 cubic yards. The change to a bigger tank will reduce the amount of truck trips needed to haul wastewater. The placement of the tank adjacent to the decontamination pad allows for the pad to function as a secondary containment for the haul truck during off-loading of the wastewater.
- c) Defer construction of the underground sewage tanks. Deferral of the underground tanks reduces the overall amount of soil disturbance by at least 800 cubic yards. All sanitary wastes will be managed in aboveground sewage tanks (similar to the ones currently used for the SPY trailers) or portable toilets.
- d) Swap the location of the construction trailers and the sunshade and change the configuration of the sunshade from a rectangle to a square. This change will allow for more working space within the CHQ. All functions that would occur in the Workshop/Sampling Processing building will be conducted in the construction trailers.

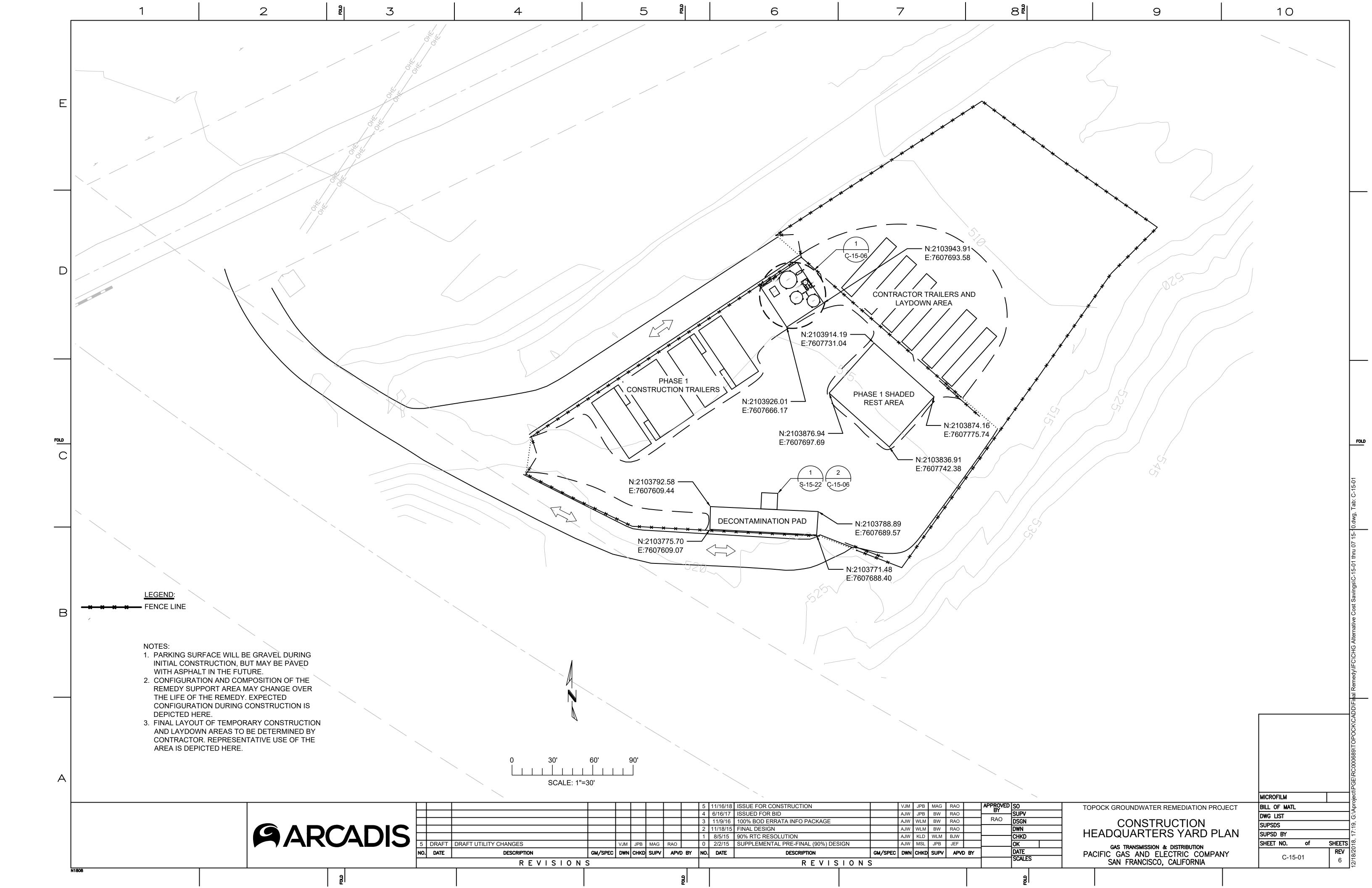
Work Variance Request Form
Groundwater Remedy Phase 1 Construction, PG&E Topock Compressor Station, Needles, California

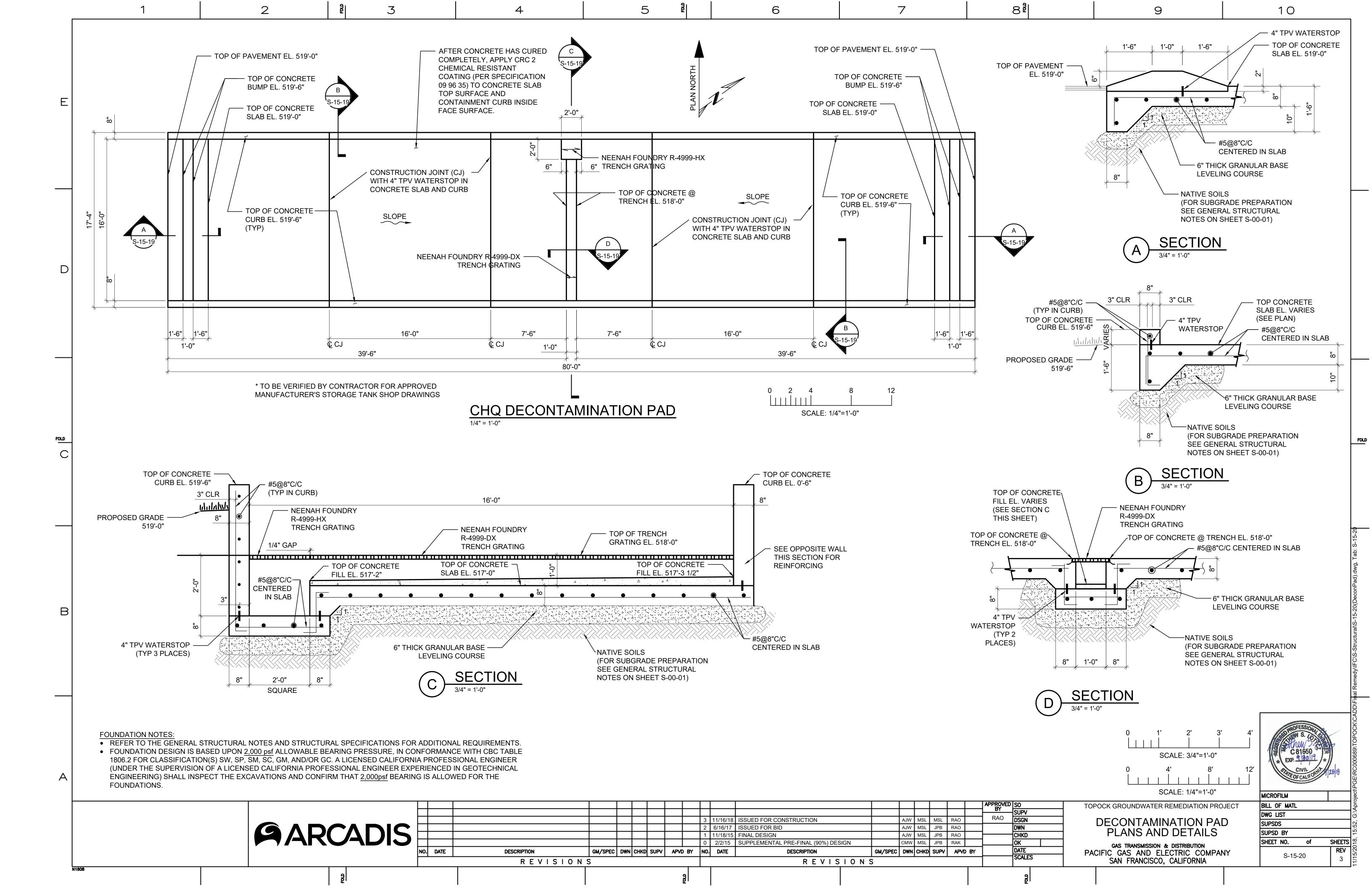
PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT

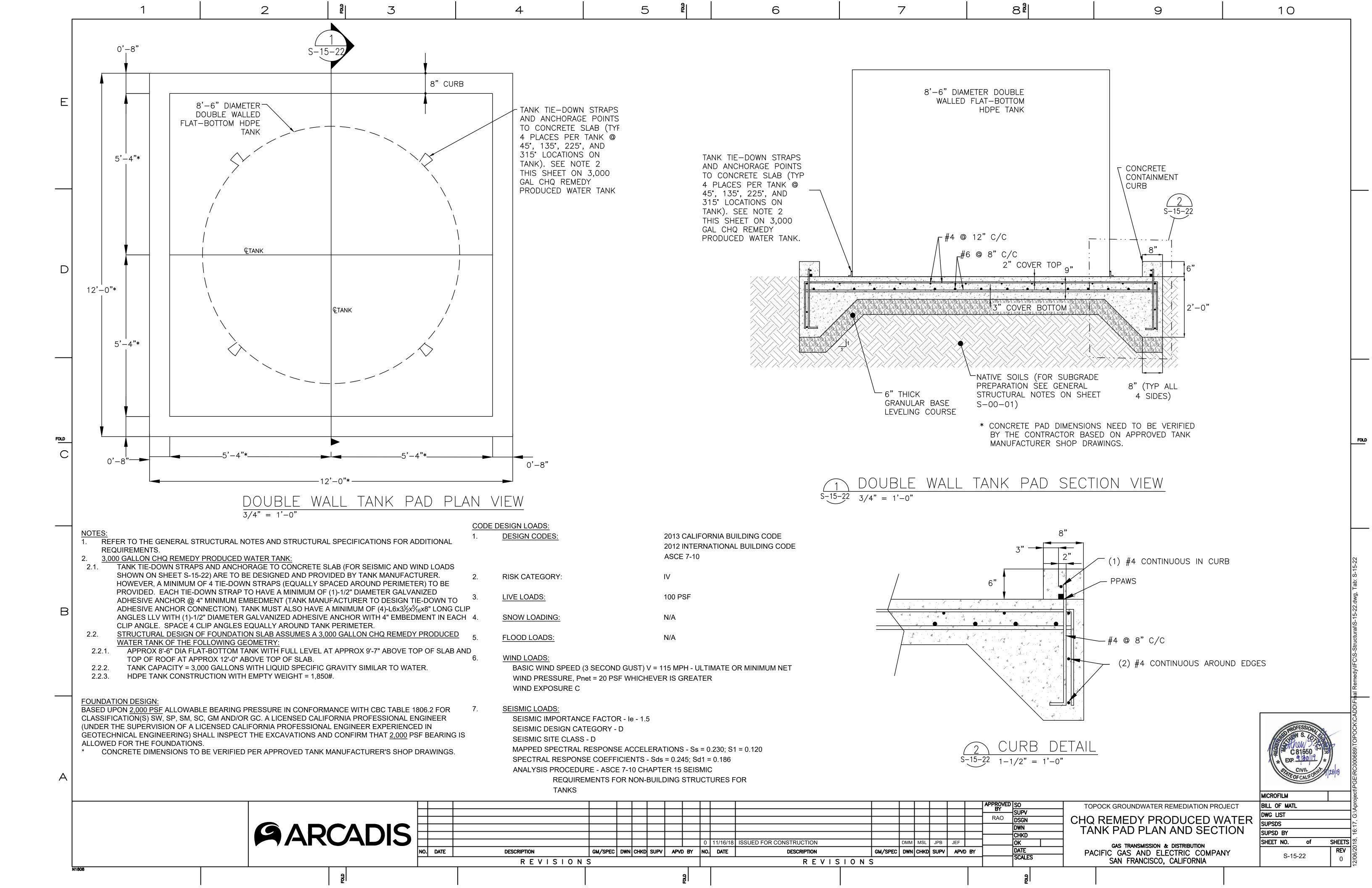
Work Variance Request #3 - Proposed changes within the Construction Headquarters fenceline

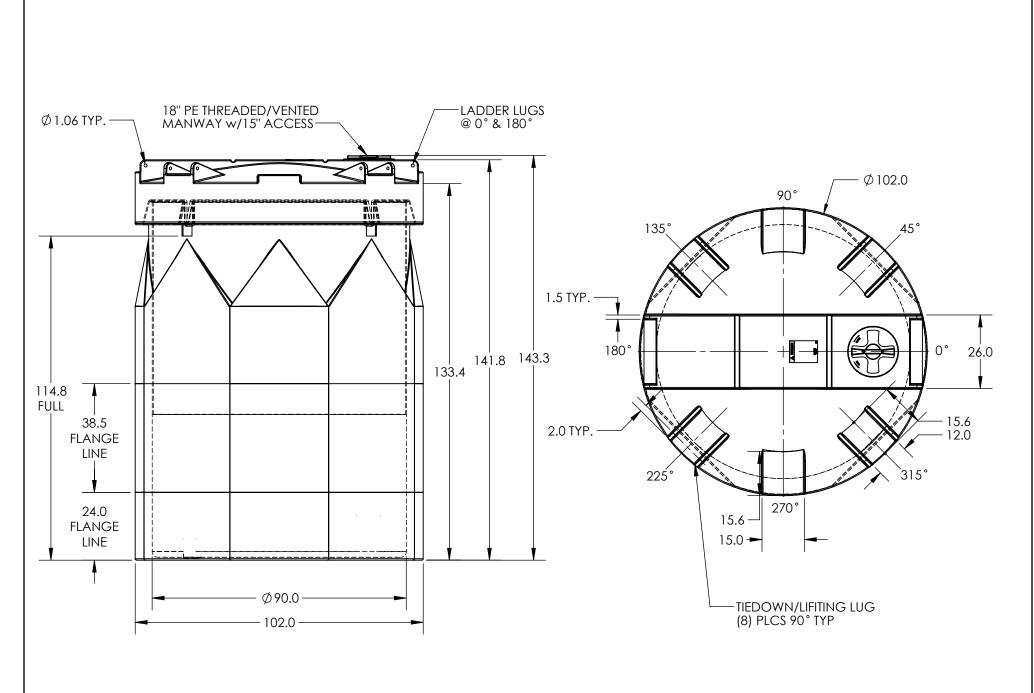
				Approval Signatures:
04/2019	L. Annis DOI	Pamela S.	7 12-21-18	RIBin
te	су	Approving Agency	er Date	PG&E Construction Manage
2019	mot DTSC	Adrin	12/20/18	Oten V. Wast
ite	су	Approving Agency	Date	PG&E QA Manager
a	су	Approving Agency	Date	PG&E QA Manager

Revised Drawings for Work Variance Request #3







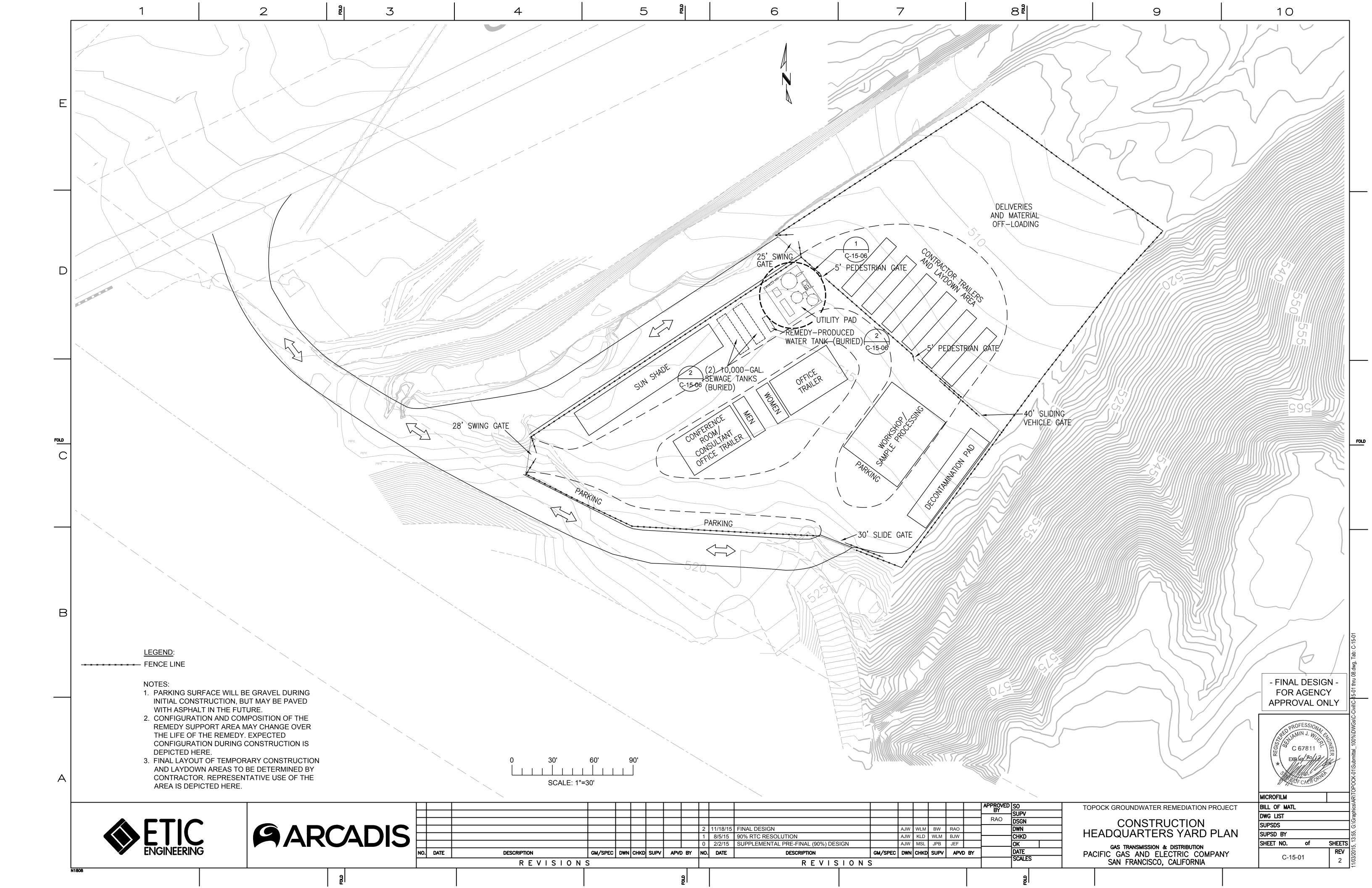


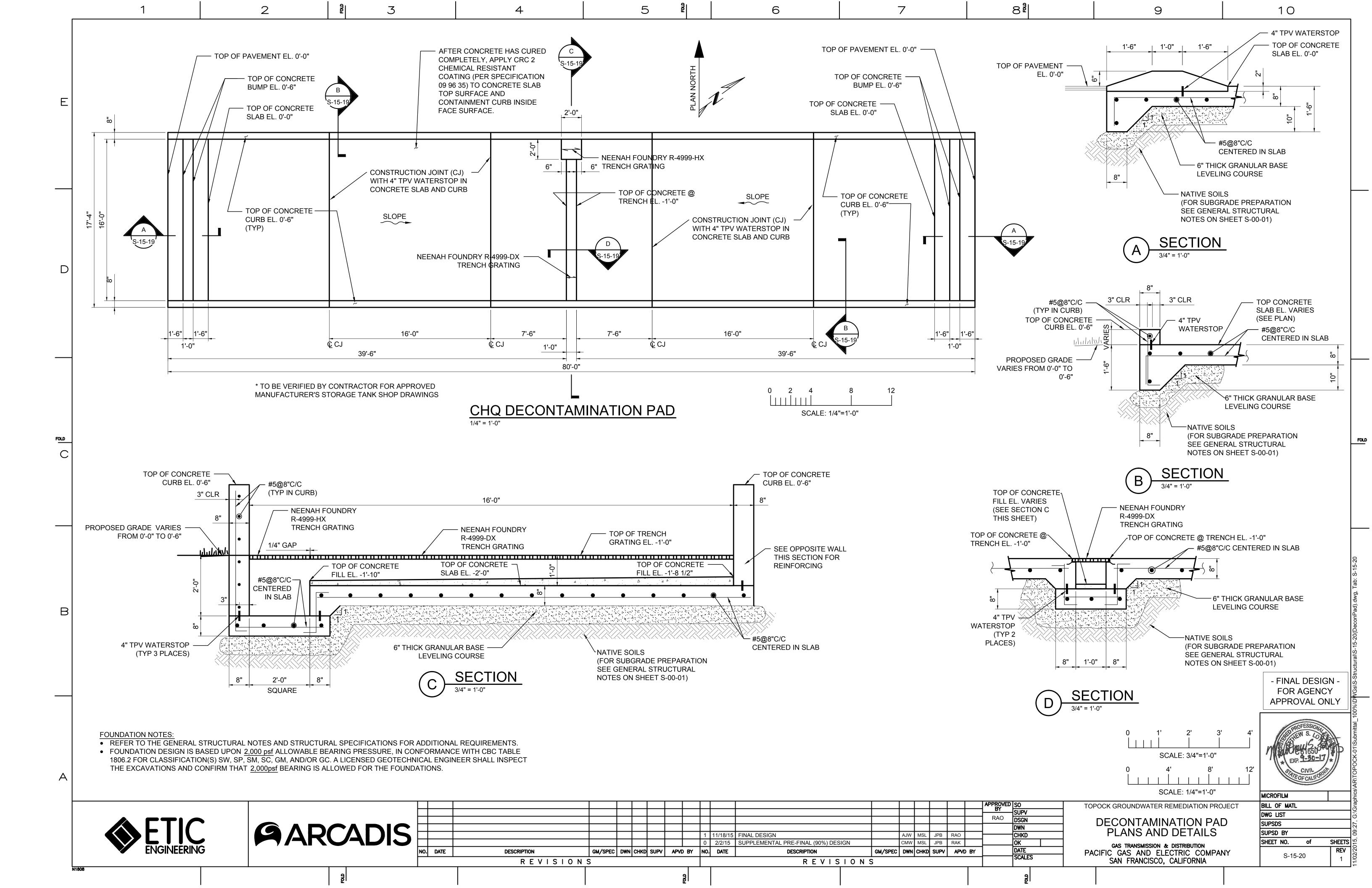
*ALL EXTERNAL PIPING MUST BE INDEPENDENTLY SUPPORTED.
*ONLY BASE FITTINGS TO BE LEFT INSTALLED AT TIME OF SHIPMENT PER SII PROCEDURE.
*Consult Snyder's Guidelines for Use and Installation prior to delivery.
Available on-line at http://www.snyderindustriestanks.com/Technical

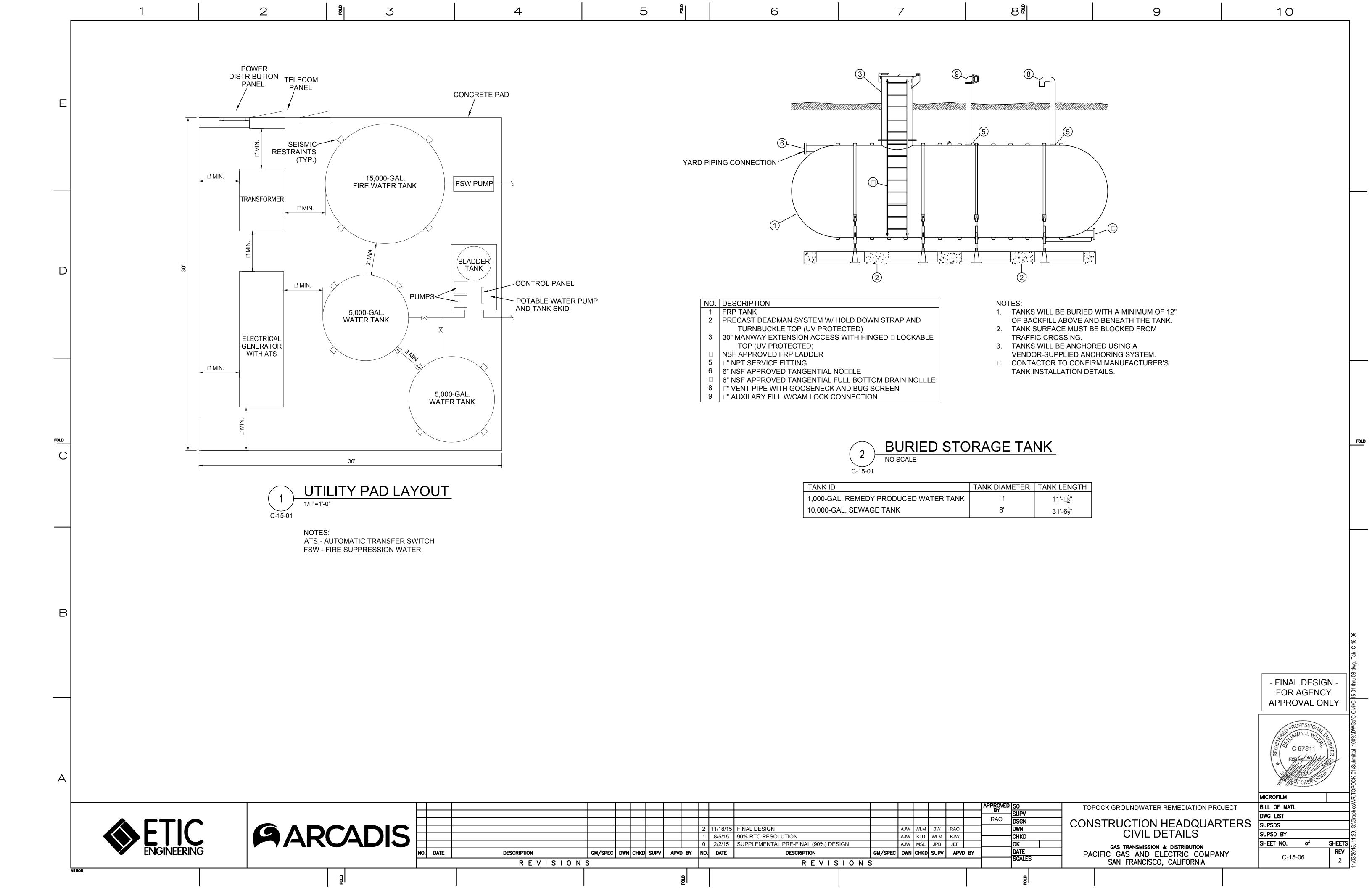
ALL DIMENSIONS ARE IN INCHES, NOMINAL, & SUBJECT TO CHANGE WITHOUT NOTICE. ALL DIMENSIONS ON ROTATIONAL MOLDED PARTS ARE SUBJECT TO A \pm 3% TOLERANCE.

DO NOT SCALE	DRAWN BY	DATE	OH CHVDER	TITLE:		REVISION
STATUS: Released	ET3	10/6/2014	INDUSTRIES, INC.	ASM TK 3000	CP X 90	A
© SNYDER INDUSTRIES	INC., 2014					SHEET 1 OF 1
ALL DIMENSIONS, DESIGNS, AND INFORMATIC CONSIDERED PROPRIETARY TO SNYDER INDU BE USED, COPIED, OR DISTRIBUTED WITHOUT V OFFICER (OR HIS AGENT) OF THE FIRM.	STRIES, INC. At	TON YAM DI	(402) 467-5221 www.snydernet.com	5590000N & 5520000N	A003553	

Drawings from Approved Final Design (November 2015)







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

work variance Request No. 3 Date: 12/17/18						
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)						
1. Are all components of the WVR in the approved final design as reviewed in the SEIR? $oximes$ Yes $oximes$ 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						
 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 						
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.)? Yes No						
If answer is No or otherwise explained in Section 7 below, action is Future Activity Allowance, follow						

Resolution of Approval. If the answer is Yes, action is Future Activity Allowance, and DTSC will work with

Future Activity Allowance Determination Matri	Χ
WVR No.	
Page 2 of 2	

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
CO	enswer is Yes, STOP – action is subject to additional CEQA evaluation. WVR approval will be insidered after DTSC completes a CEQA checklist to determine if there are new or substantially more inficant environmental impacts than disclosed in the 2018 SEIR.
7.	Other extenuating circumstances or information for FAA considerations: $\ \square$ No $\ \square$ Yes — provide information and/or justification
Co	nclusion: WVR No is a FAA is a FAA
Sig	nature of DTSC reviewer: Date: 1/4/2017