## **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 #4 – Relocate a Segment of Pipeline C to within National Trails Highway		
Request Prepared By: PG&F	Request Approval From: DTSC and DOI	
Date Submitted: April 30, 2019	Date Approval Paguiradi May 20, 2010	
Variance Request No · 4	Map Arop: N/A	
Location: Along National Trails Highway, poar LAO	Ividp Area. N/A	
Landownos/Land Managors POB/LISENAS	Jond Owner Press 1 No. 670 161 00	
Current Vegetative Cover/Land Lies None		
Existing Sensitive Resource? [_] No [_X] Yes, Specify: National Trails Highway		
Variance From: Mitigation Measure Work Plan/Procedure Response to Comments		
X Drawing Permit Condition Other		
Detailed Description of Variance and Justification (Attach additional information if necessary):		
Attachments: 🛄 Photo 🛛 X Construction Drawing 🗌 Aerial Photo Mark-Up 🗌 Correspondence 🔲 Other		
Potential Impacts of Variance:		
Air Quality Hazard	lous Materials 🔲 Aesthetic	
Biological Resources Noise	Water Resources	
Soils Paleo Resources		
Cultural Resources	ogy and Water Quality	
Description and Justification:		
Poac proposes to revise a segment of Pipeline C near the I-40 bridge, to meet the permit requirement in Caltrans		

Encroachment Permit No. 08-18-6-MW-0533. The revision involves relocating a small segment of Pipeline C to within National Trails Highway (NOTH) to meet a minimum distance of 10 feet from current and future I-40 bridge footings. The treatment measure specified for Segment X of National Trails Highway in the Cultural and Historic Property Management Plan will be implemented during installation of this pipeline segment.

Approval Signatures:		
Schusall 04/30/2019	Pamela S. Annis	20105/14/2019
PG&E Construction Manager / Date	Approving Agency	Date
Q. V. 1/25 Alzo/19	Attin PTSC	5/14/2019
PG&E QA Manager Date	Approving Agency	Date





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

Work Variance Request No. 4 Date: 4/30/19

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)

- 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?
  - $\Box$  Yes  $\boxtimes$  No

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

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

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 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 Future Activity Allowance Determination Matrix WVR No. 4 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

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.

Other extenuating circumstances or information for FAA considerations: □ No
 □ Yes – provide information and/or justification

Conclusion: WVR No. 4

 $\boxtimes$  is not a FAA  $\square$  is a FAA

Signature of DTSC reviewer:

Date: 05/14/2019