

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 #7 – Proposed changes to Construction Headquarters (CHQ) and Soil Processing Yard (SPY)

Request Prepared By: PG&E

Date Submitted: May 24, 2019

Variance Request No.: 7

Location: CHQ and SPY

Request Approval From: DTSC and DOI

Date Approval Required: June 7, 2019

Map Area: N/A

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/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 type="checkbox"/> Air Quality | <input type="checkbox"/> Hazardous Materials | <input checked="" type="checkbox"/> Aesthetic (see visualizations) |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Noise | <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:

This Work Variance Request (WVR) addresses proposed changes at the CHQ and SPY to optimize the use of available space and minimize the amount of remedy infrastructure in these areas. The attached table summarizes the changes in remedy infrastructure in these areas from the final design to this WVR. The specifics are described below and included in the attached drawings/visualizations.

- a) **Locate all temporary office and break trailers at the SPY.** PG&E proposes to keep the three existing office trailers at their current locations in the SPY and add two additional office trailers and one break trailer for workers. The additional trailers will be equipped with aboveground sewage tanks, similar to the existing trailers. They will also be powered by Needles Electric.
This will require the original SPY fence line to be extended south/southwest to encompass these trailers and the original truck entrance from National Trails Highway to the access road east of SPY. Neither changes reduce the overall area available for soil storage.
- b) **Eliminate the workshop/sample processing building at the CHQ.** The function planned for this building will be moved to the Carbon Amendment building at the MW-20 Bench. Removal of this building reduces the amount of soil disturbance by approximately 334 cubic yards.
- c) **Eliminate the sunshade at the CHQ.** The function for the sunshade will be replaced by the break trailer for the workers. Removal of the sunshade reduces the amount of soil disturbance (i.e., installation of the footings) by approximately 14 cubic yards.
- d) **Convert the utility pad at the CHQ to a smaller transformer/electrical panel pad.** With the relocation of the six trailers to SPY and elimination of the workshop/sample processing building, PG&E proposes to convert the utility pad to smaller pad for a smaller transformer/electrical panel to serve the few remaining construction trailers at the CHQ. This reduces the amount of soil disturbance by approximately 61 cubic yards.

Work Variance Request Form (Continued)

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

PG&E TOPOCK GROUNDWATER REMEDIATION PROJECT

Work Variance Request #7 – Proposed changes to Construction Headquarters (CHQ) and Soil Processing Yard (SPY)

Description and Justification: (Continued)

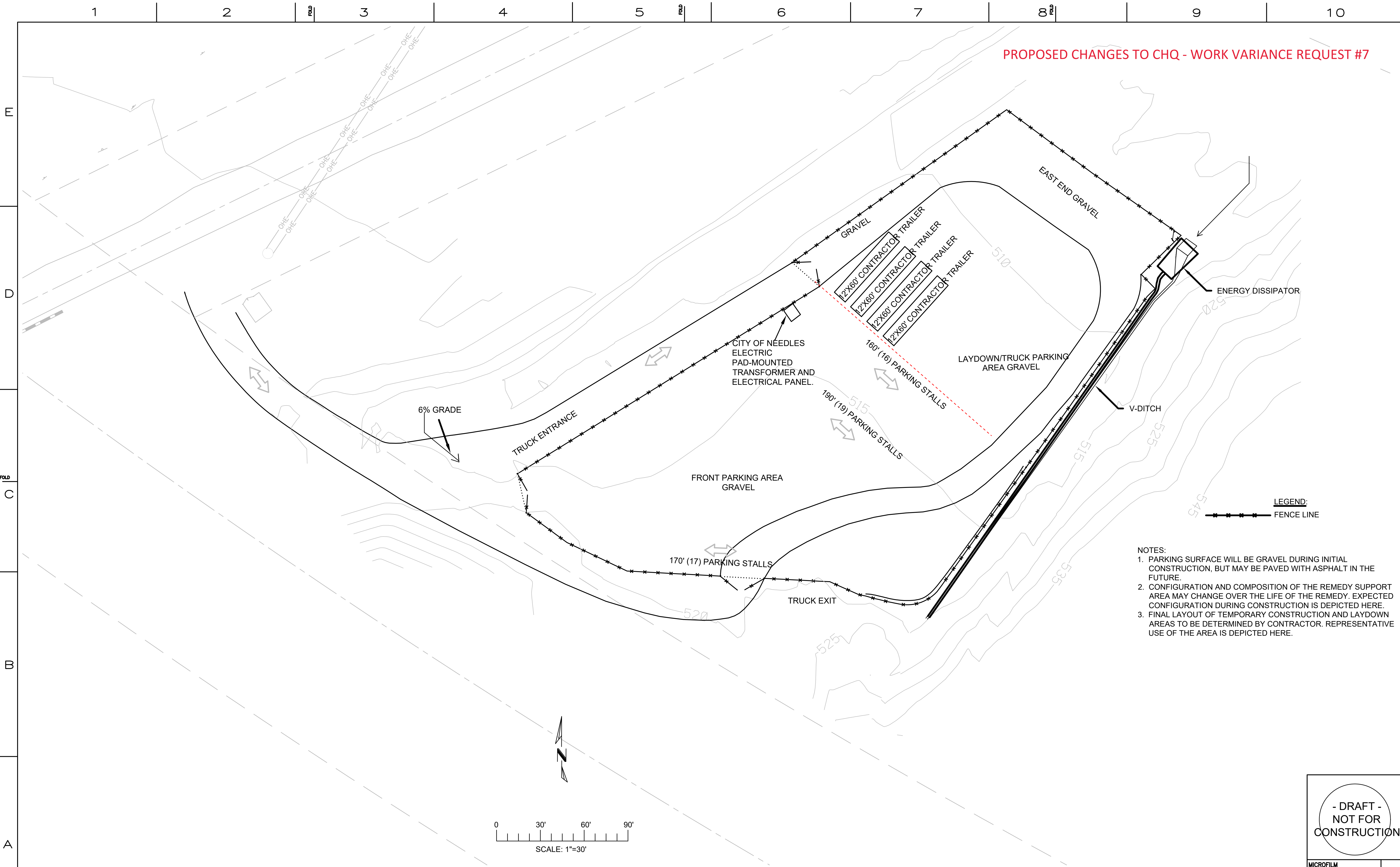
- e) Defer construction of the equipment decontamination pad and the aboveground remedy produced water tank at the CHQ until the end of Phase 2. Use the CHQ primarily for temporary equipment/vehicle parking and temporary equipment/materials staging. The current practice to decontaminate drill rigs/equipment at the drilling location and/or at the Transwestern Bench eliminates the need for the decon pad and the tank to contain decon water at the CHQ during construction. However, after Phase 2 construction is complete, PG&E anticipates that a decontamination pad and a tank to contain decon water will be needed during the operation and maintenance phase.

In sum, the proposed changes in this WVR reduce the amount of soil disturbance by approximately 409 cubic yards (from the final design). There are no additional impacts to biological, historical, and cultural resources not already evaluated.

Approval Signatures:

	5/23/19		DTSC	6/14/2019
PG&E Project Manager	Date	Approving Agency		Date
	5/24/19			06/14/2019
PG&E QA Manager	Date	Approving Agency		Date

Changes in proposed remedy infrastructure at CHQ and SPY		
Final Design	Work Variance Request (WVR) #3	WVR #7
Construction Headquarters (CHQ)		
10 construction trailers (6 @ approx. 12'x60' each, 2 @ approx. 24'x60' each, 2 @ approx. 12'x24' each)	10 construction trailers (2 @ approx. 12'x60' each, 4 @ approx. 24'x60' each)	4 construction trailers (4 @ approx. 12'x60' each)
1 workshop/sample processing building (approx. 50'x60') (eliminated)	-	-
1 sunshade (approx. 20'x150' shaded area, 12 footings @ 4'x4'x2' each) (eliminated)	1 sunshade (approx. 50'x60' shaded area) (eliminated)	-
1 utility pad (approx. 30'x30')	1 utility pad (approx. 30'x30')	1 transformer pad with electrical panel (approx. 8'x8')
2 underground sewage tanks (10,000 gallons each) (eliminated)	-	-
1 underground wastewater tank (1,000 gallons) (brought aboveground in WVR #3)	1 aboveground wastewater tank with concrete pad (2,500 gallons)	1 aboveground wastewater tank with concrete pad (2,500 gallons) (defers to end of Phase 2)
1 decontamination pad (approx. 17'4"x80')	1 decontamination pad (approx. 17'4"x80')	1 decontamination pad (approx. 17'4"x80') (defers to end of Phase 2)
Security fence	Security fence	Security fence
Soil Processing Yard (SPY)		
-	Not included	6 construction trailers (4 @ approx. 24'x60' each, 1 @ approx. 8'x28', 1 @ approx. 8'x40')
Elevated water tank	Not included	Elevated water tank
Covered break area (removed)	Not included	-
Security fence	Not included	Security fence (extended to NTH to encompass the construction trailers)
Estimated Net Change in the Excavated Soil Volume	A reduction of approx. 850 cubic yards	A reduction of approx. 409 cubic yards



PROPOSED CHANGES TO CHQ - WORK VARIANCE REQUEST #7

- NOTES:
1. PARKING SURFACE WILL BE GRAVEL DURING INITIAL CONSTRUCTION, BUT MAY BE PAVED WITH ASPHALT IN THE FUTURE.
 2. CONFIGURATION AND COMPOSITION OF THE REMEDY SUPPORT AREA MAY CHANGE OVER THE LIFE OF THE REMEDY. EXPECTED CONFIGURATION DURING CONSTRUCTION IS DEPICTED HERE.
 3. FINAL LAYOUT OF TEMPORARY CONSTRUCTION AND LAYDOWN AREAS TO BE DETERMINED BY CONTRACTOR. REPRESENTATIVE USE OF THE AREA IS DEPICTED HERE.

LEGEND:
FENCE LINE



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TOPOCK GROUNDWATER REMEDIATION PROJECT
CONSTRUCTION HEADQUARTERS YARD PLAN
GAS TRANSMISSION & DISTRIBUTION
PACIFIC GAS AND ELECTRIC COMPANY
SAN FRANCISCO, CALIFORNIA

- DRAFT -
NOT FOR
CONSTRUCTION

MICROFILM	
BILL OF MATL	
DWG LIST	
SUPSDS	
SUPSD BY	
SHEET NO.	of SHEETS
C-15-01	REV 6

WORK VARIANCE REQUEST #7
SEIR Viewpoint C - National Trails Highway looking
southwest toward the Construction Headquarters



NOVEMBER 2015 FINAL DESIGN

NOTES:

1. FOR FENCING AND GRAVEL ROAD DETAILS, SEE SHEETS C-00-05, C-00-06, AND C-00-07.
2. FINAL LAYOUT OF TEMPORARY CONSTRUCTION AND LAYDOWN AREAS TO BE DETERMINED BY CONTRACTOR. REPRESENTATIVE USE OF THE AREA IS DEPICTED HERE.

GATE WITH HIGH
SECURITY PG&E LOCK

SCREENING
REJECT
PILE

SCREENING/
PROCESSING
AREA

GENERATED SOIL
STAGING AREA

TRUCK PATH

A diagram showing a truck's path on a road. The road has multiple lanes separated by dashed lines. A solid line on the right side of the road is labeled "TRUCK PATH". The truck's path is indicated by a series of asterisks (*) along this solid line.

SCREENED/GENERATED
MATERIAL
STORAGE

(N
PE

~~NEW OVERHEAD LINE~~

15

LINE FOR REMEDY

(F

~~ELEVATED
WATER TANK~~

COVE
AREA

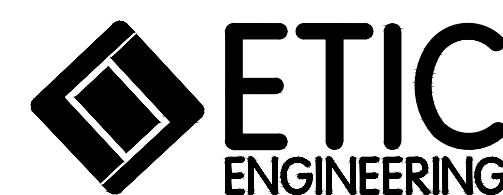
POWER
DISTRIBUTION
AND LIGHTING
PANEL

GATE WITH HIGH
SECURITY PG&E LOCK

TRUCK TRACKING PAD
(PROVISIONAL)

STATE

The logo for the A.T.&S.T.R.R. BNSF RAILROAD. It features the text "A.T.&S.T.R.R." in a large, stylized, serif font, with "BNSF RAILROAD" in a smaller, sans-serif font below it. The logo is oriented diagonally across the page.



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TOPOCK GROUNDWATER REMEDIATION PROJECT

**PARK MOABI SOIL STAGING AND
STORAGE SITE PLAN**

**GAS TRANSMISSION & DISTRIBUTION
PACIFIC GAS AND ELECTRIC COMPANY
SAN FRANCISCO, CALIFORNIA**

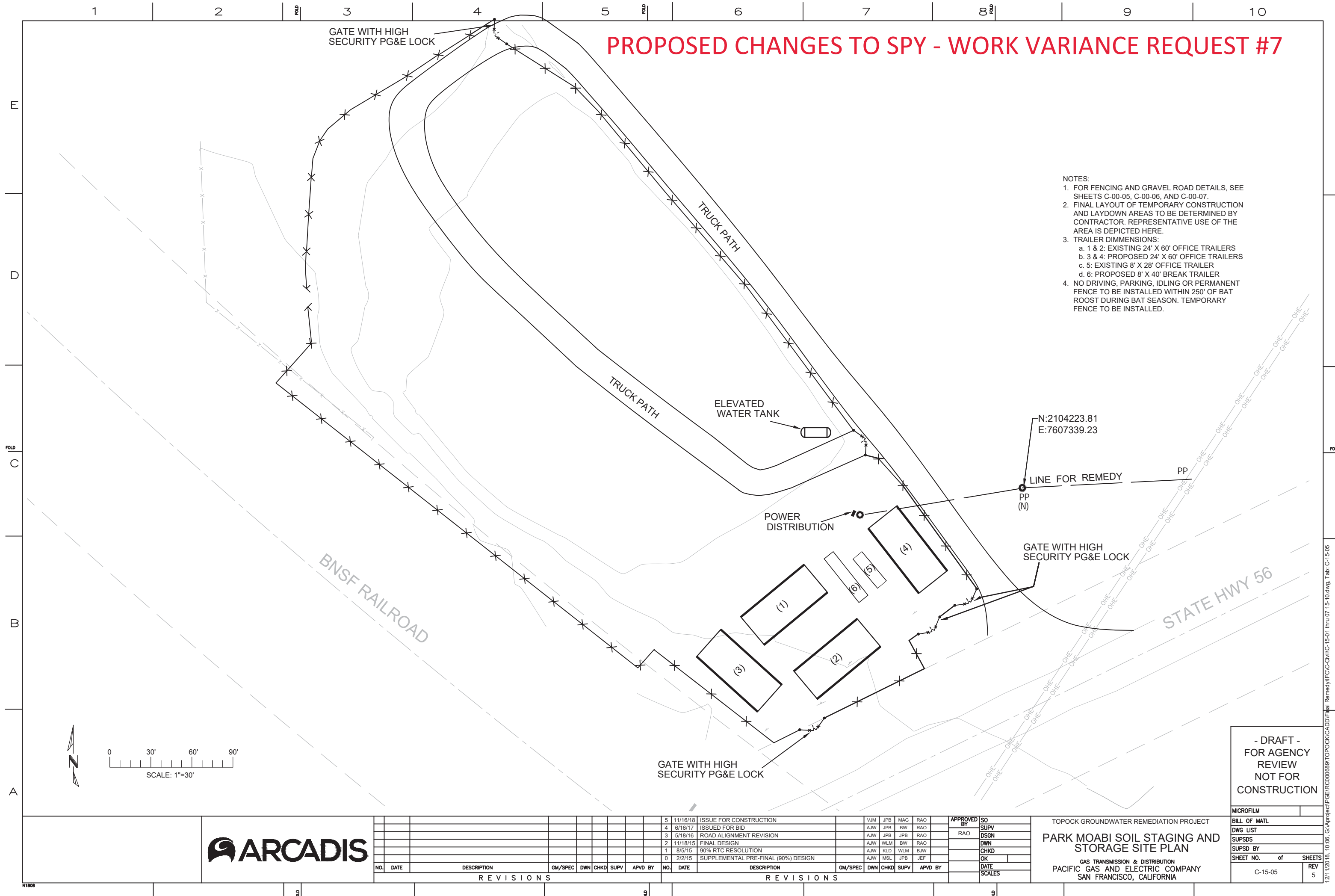
- FINAL DESIGN -
FOR AGENCY
APPROVAL ONLY



MICROFILM	
BILL OF MATL	
DWG LIST	
SUPSDS	
SUPSD BY	
SHEET NO.	of SHEETS
C-15-05	REV 3

PROPOSED CHANGES TO SPY - WORK VARIANCE REQUEST #7

- NOTES:
1. FOR FENCING AND GRAVEL ROAD DETAILS, SEE SHEETS C-00-05, C-00-06, AND C-00-07.
 2. FINAL LAYOUT OF TEMPORARY CONSTRUCTION AND LAYDOWN AREAS TO BE DETERMINED BY CONTRACTOR. REPRESENTATIVE USE OF THE AREA IS DEPICTED HERE.
 3. TRAILER DIMENSIONS:
 - a. 1 & 2: EXISTING 24' X 60' OFFICE TRAILERS
 - b. 3 & 4: PROPOSED 24' X 60' OFFICE TRAILERS
 - c. 5: EXISTING 8' X 28' OFFICE TRAILER
 - d. 6: PROPOSED 8' X 40' BREAK TRAILER
 4. NO DRIVING, PARKING, IDLING OR PERMANENT FENCE TO BE INSTALLED WITHIN 250' OF BAT ROOST DURING BAT SEASON. TEMPORARY FENCE TO BE INSTALLED.



- DRAFT -
FOR AGENCY
REVIEW
NOT FOR
CONSTRUCTION

MICROFILM		
BILL OF MATL		
DWG LIST		
SUPSDS		
SUPSD BY		
SHEET NO. of		SHEETS
C-15-05		REV 5

12/1/2018, 10:00, G:\project\IFGE\K000003\1 OF 00\ICADD\Hillal Kennedy\IC-CIVIL\IC-13-01.dwg, Tab: C=13-00

WORK VARIANCE REQUEST #7
SEIR Viewpoint D - National Trails Highway looking north
toward the Soil Processing Yard



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

Work Variance Request No. 7

Date: 5/24/19

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)

1. Are all components of the WVR in the approved final design as reviewed in the SEIR?

☐ Yes ☒ No (8'x 40' Break Trailer replacing covered break area in design)

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

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 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.

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

☐ Yes – provide information and/or justification

Conclusion: WVR No. 7

☒ is not a FAA ☐ is a FAA

Signature of DTSC reviewer: _____



Date: 06/14/2019