

**SUNRISE POWERLINK:
NOTIFICATION AND/OR REQUEST FOR CHANGE IN CONSTRUCTION ACTIVITY
“WATERS OF THE US” AND “WATERS OF THE STATE”**

Corps of Engineers File Number: SPL-2007-00704-SAS

State Water Resources Control Board File Number: SB09015IN

Department of Fish and Game Notification Number: 1600-2009-0365-R5

Date Filed:	23 August 2011			
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Type of Change/Request	<input type="checkbox"/> Change in Location or Amount of Permanent Disturbance <input type="checkbox"/> Change in Location or Amount of Temporary Disturbance <input checked="" type="checkbox"/> Other: <ul style="list-style-type: none"> Amendment to NWP12 condition 22 (prohibition on refueling within waters of the US) Amendment to 401 Certification condition 19 (prohibition on refueling in and within 200 feet of waters of the US). 			
Action Required by:	<input checked="" type="checkbox"/> US Army Corps of Engineers (Corps) <input checked="" type="checkbox"/> State Water Resources Control Board (SWRCB) <input type="checkbox"/> California Department of Fish and Game (CDFG)			
Affected Waters and Project Sites	HMMP Mapsheet #	Single and Complete Project #	Water #	Project Site #
	Attachment A	Attachment A	Attachment A and Mapbook	Attachment A and Mapbook

<p>Description</p>	<p><u>Proposed Amendments</u></p> <p>SDG&E is requesting that:</p> <ol style="list-style-type: none"> 1. The Corps amend condition 22 of the Project’s NWP12 to allow: <ol style="list-style-type: none"> a. Refueling within waters of the US at 8 sites (4 structure sites and 4 wire stringing sites); and b. Storage of 200-gallon fuel transfer cells on platforms (above waters) for micropile foundations at 2 of the structure sites. 2. The SWRCB amend condition 19 of the Project’s 401 certification to allow: <ol style="list-style-type: none"> a. Refueling in waters of the US and State at the same 8 sites included in the proposed 404 amendment; b. Refueling within 200 feet of waters of the US and State at 146 sites (116 structure sites, 29 wire stringing sites, and 1 construction yard [CYS2]); c. Storage of 200-gallon fuel transfer cells on platforms (above waters) for micropile foundations at 57 of the structure sites; and d. Lubrication, maintenance, storage, and staging of vehicles and equipment in a 200-foot-by-200-foot (approximately 0.92 acre) helicopter operations area (HOA) in CYS2. <p><u>Project Sites Included in the Amendments</u></p> <p>The 8 sites where refueling would be allowed in waters are highlighted in blue on Attachment A (pages A3, A4, and A7-A11) and are depicted in the Mapbook (pages M-10, M-13, M-25, M-28, M-34, M-41, and M-48). The sites include two for towers with conventional foundations (EP324 and EP323-1), two for towers with micropile foundations (EP188-1 and EP138-2), and four for wire stringing sites along the 500 kV portion of the alignment (at EP313/314, EP292/291, EP255, and EP226/225).</p> <p>The 146 sites for refueling within 200 feet of waters are identified in Attachment A and depicted in the Mapbook. The sites include 59 for towers with conventional foundations, 57 for towers with micropile foundations, 29 wire stringing sites (23 along the 500 kV portion and 6 along on the 230 kV portion of the alignment), and the HOA in CYS2. The sites also include 6 of the sites for which authorization for refueling in waters also is being sought (EP188-1, EP138-2, and the 4 wire stringing sites).</p>
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<p>Description continued</p>	<p><u>Best Management Practices</u></p> <p>To minimize and monitor potential impacts from refueling, SDG&E proposes to implement the measures identified in Attachment B. These measures include but are not limited to the following:</p> <ol style="list-style-type: none"> 1. Refueling in waters will be allowed only at the 8 specified sites. 2. All vehicles and equipment will continue to be inspected and maintained throughout the Project to prevent and minimize any spills and/or leaks. 3. Fueling will only occur when there is no water present within the jurisdictional area 4. No fueling will occur during rainfall events. 5. Fueling will only be performed by individuals trained in refueling operations. 6. Fueling at the structure sites with conventional foundations, at wire stringing sites, and in the HOA at CYS2 will occur via pickup trucks equipped with fuel transfer tanks. Each fuel transfer tank will have a capacity no greater than 95 gallons. Pickup trucks with fuel transfer tanks will not be allowed to remain at the structure site or wire stringing site overnight. 7. Fueling at the structure sites where micropile foundations are being constructed will occur using a 200 gallon fuel transfer cell with secondary containment. For smaller fuel amounts, 5-gallon safety cans may be used to transfer the fuel. The fuel cell will be place on or near the platform(s) that are active (i.e., at the foundation leg(s) where construction is underway). The fuel cell will remain onsite until it needs to be refilled (typically once per day). If kept onsite overnight, fuel cells will be kept on the platform (above waters), preferably in a location outside of waters. The cell will be taken offsite to a staging yard for refueling, when needed. 8. Fueling operations involving fuel transfer tanks or fuel cells will be observed by a minimum of two individuals: one at the point of refueling and one at the fuel tank or fuel cell. The transfer of fuel from a 5-gallon gas to equipment may be observed by one individual. 9. Where fueling occurs in waters, one of the observers shall be a environmental monitor on the list(s) of monitors provided to the Corps, SWRCB, and CDFG. 10. A running log will be kept of all refueling operations, including location, personnel responsible, equipment type, start and end time, and total gallons of fuel delivered. This log will also include the date that fueling began at the site and the date that fueling ended at the site.
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<p>Description continued</p>	<p>11. Secondary containment and impervious protection will be required at all fueling locations at structure sites and wire stringing sites.</p> <ul style="list-style-type: none"> a. At conventional foundation structure sites and wire stringing sites, the equipment to be fueled will be on top of construction-grade plastic sheeting (commonly known as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. If the tracked piece of equipment is a drill rig, the plastic will extend beyond the auger to catch any drips from the auger and will be bermed. b. At micropile sites, the drilling rig is on a platform, and the fuel cell will sit inside an impervious aluminum box. The generator sets inside an impervious aluminum box, which will provides secondary containment. The air compressor sets on top of Visqueen. c. The minimum thickness of the Visqueen used for secondary containment shall be 8 mm for fueling locations in waters and 6 mm for fueling locations within 200 feet of waters. d. When refueling from a pickup truck transfer tank, 200-gallon fuel cell, or 5-gallon gas can, the refuelers will place an absorbent pad underneath the nozzle/spout to capture any stray drips. e. Equipment will not be overfilled, and room will be left to allow for expansion, especially during times of extreme temperature change. f. Several 5-gallon spill kits will be kept at each fueling site. <p>12. In the CYS2 HOA, light and medium duty helicopters will be refueled via a 7800-gallon capacity fuel truck.</p> <ul style="list-style-type: none"> a. The truck will access the HOA via the Equipment Storage/Refueling Area (see figure in Attachment B). b. Refueling operations will use a closed system with the fuel nozzle affixed securely with a seal to the fueling port. c. The refueling will be done by two individuals to further prevent the chance of spills. One individual will be stationed at the emergency fuel shutoff valve on the fueling truck and one individual will be stationed at the fuel nozzle with absorbent spill cleanup materials for prompt response, should a spill occur. d. The helicopter operations and refueling area will be graded level and rock will be placed on the surface to reduce dust emissions from rotor wash. This rocked surface will also help to prevent migration of hydrocarbons into the underlying soil, should a fuel spill occur.
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	<p>e. An earthen berm, approximately 12 inches high, will also be constructed around the perimeter of the helicopter operation and refueling area. This earthen berm will act as a barrier to prevent fuel or hazardous materials from entering a jurisdictional water in the event of a large release during refueling operations.</p>
Reason for Change	<p>SDG&E is seeking the amendments in order to:</p> <ol style="list-style-type: none"> 1. Expedite the completion of ground-disturbing construction activities at each site and thereby avoid extending the period of disturbance at each site if work must be suspended to refuel equipment in locations beyond 200 feet of the US. 2. Facilitate the completion of segments of the line where construction has already occurred and where construction needs to occur within a short timeframe (mid-August through December) because of the environmental and regulatory constraints. <p>To facilitate review and processing of the proposed 404 amendment, all information regarding the measures that apply to the 8 sites where refueling would occur in waters is included as Attachment C.</p> <p>This request does not authorize any additional discharge of fill to “waters” and only seeks a modification of the applicable conditions within the NWP 12 authorizations and 401 Water Quality Certification related to fueling.</p>
CPUC/BLM Variance or Other Change Authorization Requests Relevant to the Proposed Amendments	<p>No amendment to the Project’s Lake and Streambed Alteration Agreements (LSAA) is required; the LSAA includes provisions for refueling comparable to those requested in the proposed amendments.</p> <p>The proposed amendment to condition 19 of the 401 certification incorporates and replaces amendment requests previously submitted to the SWRCB for refueling within 200 feet of waters at structure site EP240 and for refueling, maintenance, storage, and staging in the HOA at CY S2.</p> <p>One of the structure sites (CP54-1) included in the 401 amendment for refueling within 200 feet of waters is part of a proposed variance (#23) pending before the CPUC. The variance would add a permanent landing platform near the structure site; it would no change the size, configuration, and type of structure at the site.</p> <p>No action by the CPUC or BLM (or other agency overseeing the Project) is required on the proposed 404 or 401 amendment. The CPUC and BLM have been notified of the proposed changes, and the amendment request has been posted for all agencies to access.</p> <p>SDG&E is in the process of preparing a request in construction activities that will result in potential additional fill within “waters”. There are three types of activities that are anticipated to occur but have not yet been fully assessed and will be submitted when complete:</p> <ol style="list-style-type: none"> 1. Potential increases in temporary and permanent impacts within authorized Single and Complete Project Areas due to changes in final engineering design

	<p>and pre-construction monitoring at sites within those areas.</p> <ol style="list-style-type: none"> 2. Potential increases in temporary impacts to waters in connection within work areas around guard structures. 3. Potential effects on waters of the State from tree trimming beneath powerlines. <p>As part of final engineering design and pre-construction monitoring, some potential new or increased impacts have been identified; SDG&E is examining ways to avoid or reduce such impacts, including reductions in impacts at other sites in the same Single and Complete Project areas.</p> <p>Regarding work areas around guard structures, SDG&E has completed planning for the installation of guard structures at road crossings, rail lines, transmission lines, etc. and has designated work areas and access roads for guard areas. In connection with this final planning, SDG&E also has assessed the work areas and access roads for presence of Federal and State waters. No new permanent impacts to waters are anticipated in connection with installing or removing the guard structures. However, there will be temporary impacts that may require NWP 12 authorization at three locations:</p> <ol style="list-style-type: none"> 1. A temporary access road leading from EP341 to the guard structure work area at the I-8 crossing will cross two dry washes that were not previously identified in the PJD database; 2. Additional guard structures are needed to support the line across a quarry road, and the work area at this location includes waters; 3. A temporary access road to the guard structures at the I-8 crossing near EP290 may be needed (the road is being reserved as an option). <p>SDG&E will submit the appropriate NWP 12 authorization request for these anticipated impacts.</p> <p>Regarding potential impacts to waters from tree trimming, SDG&E is in the process of completing an assessment of the areas that may be affected and will submit an appropriate request to the Department of Fish and Game should tree trimming affect riparian habitats. No fill in "waters" is anticipated from tree trimming.</p>
Effect on Waters of US and/or Waters of the State	<p>The change requested in Condition 22 of the NWP authorizations and Condition 19 of the 401 water quality certification would not result in any additional fill or discharge of fill in jurisdictional waters. BMPs and other controls would be implemented to reduce the increased risk and to ensure that any unavoidable impacts are appropriately mitigated.</p>
Supplemental Information	<p>Attachment A: Sites Included in the 404 and/or 401 Refueling Condition Amendments</p> <p>Attachment B: Procedures and Best Management Practices for Refueling in and within 200 Feet of Federal or State Waters</p> <p>Attachment C: Sites and Proposed Measures for the 404 Condition 22 Amendment Mapbook: Refueling Amendment Sites</p>

ATTACHMENT A**SITES INCLUDED IN THE REFUELING CONDITION AMENDMENTS**

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP355/EP356 PS	NA	MS-1	1	3-DW-2	No	
	X	EP349	Conventional	MS-05	6	5-DW-1 5-DW-2	Yes	
	X	EP349 PS	NA	MS-5	6	5-DW-1 5-DW-2 5-DW-3 5-DW-4	Yes	
	X	EP347	Conventional	MS-06	7	6-DW-3 6-DW-11 6-DW-12 6-DW-13 6-DW-14 6-DW-15 6-DW-16	Yes	
	X	EP346	Conventional	MS-06	8	6-DW-4 6-DW-5 6-DW-6 6-DW-7 6-DW-8 6-DW-9 6-DW-10 6-DW-18	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP344/EP343 PS	NA	MS-7	10	7-DW-16 7-DW-18 7-DW-24 7-DW-25 7-DW-26 7-DW-27 7-DW-28 7-DW-31 7-DW-32 7-DW-33 7-DW-34	Yes	
	X	EP342	Conventional	MS-07	11	7-DW-16 7-DW-18 7-DW-24 7-DW-25 7-DW-26 7-DW-27 7-DW-28 7-DW-31 7-DW-32 7-DW-33 7-DW-34	Yes	
	X	EP341	Conventional	MS-07	12	7-DW-7 7-DW-8 7-DW-9 7-DW-10 7-DW-11	Yes	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP339/EP338 PS	NA	MS-8	14	8-DW-3/4 8-DW-24 8-DW-25 8-DW-26 8-DW-27 8-DW-28 8-DW-29 8-DW-30 8-DW-32	Yes	
	X	EP333	Conventional	MS-09	18	9-DW-1	Yes	
	X	EP329-1	Conventional	MS-10	20	10-DW-1	No	
	X	EP326	Conventional	MS-11	21	11-DW-4	No	
	X	EP325-2	Conventional	MS-12	22	12-DW-1 12-DW-8 12-DW-9	No	
X		EP324 ²	Conventional	MS-12	22	12-DW-2	Yes	
X		EP323-1 ²	Conventional	MS-12	22	12-DW-2	Yes	
	X	EP323/EP322 PS	NA	MS-12	22	12-DW-2	Yes	

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In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP317	Micropile	MS-14	23	14-DW-11 14-DW-12 14-DW-13 14-DW-14 14-DW-16	No	
	X	EP316-2	Conventional	MS-14	24	14-DW-7	Yes	
	X	EP315-1	Micropile	MS-14	24	14-DW-4 14-DW-5 14-DW-6 14-DW-18	No	
	X	EP314	Micropile	MS-14	25	14-DW-1 14-DW-2 14-DW-3 14-DW-20 14-DW-21	No	
X	X	EP313PS ³	NA	MS-15	25	14-DW-25 14-DW-26 15-DW-5 15-DW-6 15-DW-8 15-DW-9 15-DW-12 15-DW-13 15-DW-14 15-DW-15 15-DW-16 15-DW-17	Yes	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP313	Conventional	MS-15	25	15-DW-5 15-DW-6 15-DW-8 15-DW-9 15-DW-12	Yes	
	X	EP312	Micropile	MS-15	26	15-DW-10 15-DW-11 15-DW-18 15-DW-19 15-DW-20 15-DW-27	No	
	X	EP311-1	Micropile	MS-15	26	15-DW-1 15-DW-2 15-DW-3 15-DW-4 15-DW-21 15-DW-22 15-DW-28	Yes	
	X	EP310	Micropile	MS-15	26	15-DW-23 15-DW-24 15-DW-25 15-DW-26 15-DW-29 15-DW-38 15-DW-39	No	
	X	EP309	Conventional	MS-16	27	16-DW-6 16-DW-8 16-DW-9 16-DW-51	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP308	Conventional	MS-16	27	16-DW-4 16-DW-7 16-DW-10	No	
	X	EP307-1	Conventional	MS-16	28	16-DW-5	Yes	
	X	EP307/EP306 PS	NA	MS-16	28	16-DW-12 16-DW-13 16-DW-14 16-DW-15 16-DW-16 16-DW-17 16-DW-18 16-DW-24 16-DW-26 16-DW-27	Yes	
	X	EP306-1	Conventional	MS-16	28	16-DW-1 16-DW-2 16-DW-3 16-DW-19 16-DW-20 16-DW-21 16-DW-22 16-DW-23 16-DW-24	Yes	
	X	EP305-3	Micropile	MS-17	28	17-DW-5 17-DW-6 17-DW-7	Yes	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP304-2	Conventional	MS-17	29	17-DW-4	No	
	X	EP303-2	Conventional	MS-17	30	17-DW-1 17-DW-2 17-DW-8 17-DW-9	Yes	
	X	EP302-1	Conventional	MS-17	30	17-DW-10 17-DW-11	Yes	
	X	EP300-1	Conventional	MS-18	31	18-DW-1	Yes	
	X	EP299	Conventional	MS-19	31	19-DW-24 19-DW-6	Yes	
	X	EP298	Conventional	MS-19	32	19-DW-3 19-DW-4 19-DW-5	Yes	
	X	EP297	Conventional	MS-19	33	19-DW-1 19-DW-2	Yes	
	X	S2	NA	MS-20a	33	19-DW-10 19-DW-23 20-DW-4	Yes	
	X	EP292-1	Conventional	MS-21	35	21-DW-1 21-DW-2 21-DW-3	Yes	
X	X	EP291/EP292 PS ³	NA	MS-21	35	21-DW-2 21-DW-3 21-DW-6 21-DW-7 21-DW-8	Yes	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP291-1	Conventional	MS-21	35	21-DW-4 21-DW-5	No	
	X	EP272-3	Micropile	MS-28	N/A	28-S-1	No	
	X	EP257	Conventional	MS-34	38	34-DW-1	No	
X	X	EP255 PS A&B ³	NA	MS-35	NA/41/42/NA	35-S-5 35-S-6 35-S-7 35-S-8 35-S-10	Yes	
	X	EP252-1	Conventional	MS-35	39/40	35-S-2 35-S-4	Yes	
	X	EP251	Conventional	MS-36	44	36-S-2 36-S-3 36-S-4	Yes	
	X	EP249-1	Micropile	MS-36	N/A	36-S-5	No	
	X	EP248-1	Conventional	MS-36	N/A	36-DW-8	No	
	X	EP247	Conventional	MS-36	43	36-S-1	No	
	X	EP246	Micropile	MS-37	N/A	37-S-1	No	
	X	EP240	Conventional	MS-38	N/A	38-DW-1	Yes	

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In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP234-1	Micropile	MS-39	N/A	39-S-4	No	
X	X	EP225/EP226 PS ³	NA	MS-42	48	42-S-1	Yes	
	X	EP221-2	Micropile	MS-43	N/A	43-S-3	No	
	X	EP220 PS	NA	MS-43	NA/50/NA/NA	43-S-6 43-S-7 43-S-9 43-W-1	Yes	
	X	EP219 PS A&B	NA	MS-45	1	45-S-1	No	
	X	EP215 PS	NA	MS-46	52/NA	46-S-2 46-S-5	No	
	X	EP204-3	Conventional	MS-49	57	49-S-1 49-S-2	No	
	X	EP199-3	Conventional	MS-51	59	51-S-1 51-S-3	No	
	X	EP198-3	Conventional	MS-51	59	51-S-1	No	
	X	EP190-2	Conventional	MS-53	N/A	53-S-1 53-S-2 53-S-3	No	
	X	EP189-3	Micropile	MS-53	N/A	53-S-4 53-S-5 53-S-6	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
X	X	EP188-1 ³	Micropile	MS-53	63	53-S-13 53-S-14 53-S-15 53-S-18 53-S-19	Yes	
	X	EP187-2	Conventional	MS-53	61/62	53-S-7 53-S-8 53-S-9	No	
	X	EP187 PS	NA	MS-53	NA/61/NA	53-S-11 53-S-7 54-S-14	No	
	X	EP185-1	Conventional	MS-54	64	54-S-3 54-S-4	Yes	
	X	EP184-1	Conventional	MS-54	65	54-S-5 54-S-6	No	
	X	EP183	Micropile	MS-55	N/A	55-S-1 55-S-2 54-S-27	No	
	X	EP176	Conventional	MS-56	77	56-S-5	No	
	X	EP173-1	Conventional	MS-57	78	57-S-1	No	
	X	EP152-2	Micropile	MS-58	79	58-S-1	No	
	X	EP149-1	Micropile	MS-59	N/A	59-S-1	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
X	X	EP138-2 ³	Micropile	MS-62	80/81	62-S-1 62-S-2 62-S-3	Yes	
	X	EP130-1	Conventional	MS-64	N/A	64-S-2 64-2-3	No	
	X	EP130/EP131 PS	NA	MS-64	N/A	64-S-2	No	
	X	EP126-1	Conventional	MS-65	86/NA/NA	65-S-1 65-S-2 65-S-17	No	
	X	EP125	Conventional	MS-66	NA/88	66-S-5 66-S-6	No	
	X	EP122-1	Micropile	MS-66	N/A	66-S-1	No	
	X	EP120A	Micropile	MS-66	N/A	66-S-2	No	
	X	EP113-5	Conventional	MS-68	88	68-S-6	Yes	
	X	EP113 PS A&B	NA	MS-68	88	68-S-6	No	
	X	EP112A-1	Conventional	MS-68	88/89	68-S-6 68-S-7	Yes	
	X	EP112-3	Conventional	MS-68	88	68-S-6	No	
	X	EP102A-1	Micropile	MS-72	N/A	72-S-2	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP97	Conventional	MS-72	N/A	72-S-2 72-S-3 72-S-4	No	
	X	EP89 PS	NA	MS-76	N/A	76-S-1	No	
	X	EP89	Conventional	MS-76	N/A	76-S-1	No	
	X	EP84	Conventional	MS-79	97	79-S-1	No	
	X	EP83 PS A&B	NA	MS-79	98/NA	79-S-4 79-S-6	Yes	
	X	EP79	Micropile	MS-80	N/A	80-S-1	No	
	X	EP78A	Micropile	MS-80	N/A	80-S-2 80-S-3 80-S-10	No	
	X	EP78/EP78A PS	NA	MS-80	NA/NA/99	80-S-3 80-S-4 80-S-9	No	
	X	EP78	Micropile	MS-80	NA/99	80-S-5 80-S-9	No	
	X	EP69	Micropile	MS-82	100/101/NA	82-S-1 82-S-2 82-W-1	No	
	X	EP68	Conventional	MS-82	N/A	82-S-3	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP57-2	Micropile	MS-84	N/A	84-S-1	No	
	X	EP51-1	Conventional	MS-88	N/A	88-S-6 88-W-1 88-W-2	No	
	X	EP39-1	Conventional	MS-92	103	92-S-3	No	
	X	EP37-2	Micropile	MS-134	N/A	93-S-4 93-W-1	No	
	X	EP36-1	Conventional	MS-93	N/A	93-S-5 93-S-6 93-S-7	No	
	X	EP30-2	NA	MS-96	N/A	96-S-4	No	
	X	EP29-2	Micropile	MS-93	N/A	93-S-4 93-W-1	No	
	X	EP27-1	Conventional	MS-97	N/A	97-S-9	No	
	X	EP26-1	Conventional	MS-97	N/A	97-S-5	No	
	X	EP24-1	Conventional	MS-98	N/A	98-S-3	No	
	X	EP23PS	NA	MS-99	N/A	99-S-6	No	
	X	EP23-2	Conventional	MS-99	N/A	99-S-6	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	EP22-1	Micropile	MS-99	NA/108/109	99-S-1 99-S-2 99-S-3	Yes	
	X	EP22 PS	NA	MS-99	107/108/109	99-S-1 99-S-2 99-S-3	No	
	X	EP9 PS	NA	MS-103	NA/NA/NA/NA/110	103-S-10 103-S-2 103-S-5 103-S-8 103-S-9	No	
	X	EP9-1	Conventional	MS-103	NA/NA/NA/110	103-S-2 103-S-3 103-S-8 103-S-9	No	
	X	EP8-2	Micropile	MS-103	N/A	103-S-2 103-S-4	No	
	X	EP6-1	Micropile	MS-104	N/A	104-S-1	No	
	X	CP109 PS	NA	MS-109	120	109-S-1	No	
	X	CP96-1	Conventional	MS-111	121/122	111-S-1 111-S-2	No	
	X	CP95-1	Conventional	MS-111	121/122/123	111-S-1 111-S-2 111-S-9	Yes	
	X	CP96/CP95 PS	NA	MS-112	124	112-S-1	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	CP86	Micropile	MS-118	N/A	118-S-1 118-S-2 118-S-3	No	
	X	CP85-1	Micropile	MS-118	NA/129	118-S-6 118-S-7	Yes	
	X	CP84	Micropile	MS-118	N/A	118-S-12	No	
	X	CP83	Micropile	MS-118	N/A	118-S-8 118-S-9 118-S-10 118-S-11	No	
	X	CP82-1	Micropile	MS-119	N/A	119-S-18	No	
	X	CP81-1	Micropile	MS-119	N/A	119-S-14 119-S-15 119-S-16 119-S-17	No	
	X	CP80-2	Micropile	MS-119	N/A	119-S-9 119-S-10 119-S-11	No	
	X	CP79-1	Micropile	MS-119	N/A	119-S-7 119-S-8	No	
	X	CP78-2	Micropile	MS-119	N/A	119-S-3	No	
	X	CP74-2	Micropile	MS-121	N/A	121-S-3 121-S-8	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	CP71	Micropile	MS-121	N/A	121-S-4	No	
	X	CP67-3	Micropile	MS-123	N/A	123-S-1	No	
	X	CP66-2	Micropile	MS-123	N/A	123-S-5	No	
	X	CP65-1	Micropile	MS-123	N/A	123-S-9 123-S-10 123-S-11 123-S-12	No	
	X	CP65/CP64 PS	NA	MS-123	N/A	123-S-12	No	
	X	CP64-2	Micropile	MS-123	N/A	123-S-14 123-S-15	No	
	X	CP63-3	Micropile	MS-124	N/A	124-S-1	No	
	X	CP61-1	Micropile	MS-124	NA/131/NA	124-S-3 124-S-4 124-S-3	Yes	
	X	CP58-1	Micropile	MS-124	N/A	124-S-3	No	
	X	CP56-1	Micropile	MS-127	N/A	127-S-9	No	
	X	CP55/CP56 PS	NA	MS-127	132	127-S-10	No	

Attachment A: Sites Included in the 404 and/or 401 Refueling Amendment to Conditions 22 and Condition 19

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters ¹	Pending Variance as of 8/22/11
	X	CP54-1	Micropile	MS-129	N/A	129-S-24	No	CPUC Variance 23: Add permanent landing platform
	X	CP53-1	Micropile	MS-129	N/A	129-S-12	No	
	X	CP52	Micropile	MS-129	N/A	129-S-11	No	
	X	CP51-2	Micropile	MS-129	N/A	129-S-7 129-S-8	No	
	X	CP50-1	Micropile	MS-129	133/NA	129-S-1 129-S-2	No	
	X	CP48/49 PS Pad	NA	MS-130	135	130-S-1	No	
	X	CP44-1	Micropile	MS-131	N/A	131-S-7	No	
	X	CP34-2	Micropile	MS-135	N/A	135-S-4	No	
	X	CP31 PS	NA	MS-136	N/A	136-S-10	No	

Notes

- 1 A Federal or State water crosses a portion of the 44 sites on this list. Refueling in waters would be allowed only in the 8 sites included in both the 404 and 401 amendment.
- 2 This site is entirely within a dry wash identified as Federal and State water.
- 3 For this site, SDG&E is seeking authorization to refuel in as well as within 200 feet of waters.
- 4 The 404 and 401 condition amendment for CYS2 would allow fueling, lubrication, maintenance, storage, and staging of vehicles and equipment in a 200-foot-by-200-foot (approximately 0.92 acre) helicopter operations area within 200 feet of waters.

ATTACHMENT B

PROCEDURES AND BEST MANAGEMENT PRACTICES FOR REFUELING IN AND WITHIN 200 FEET OF FEDERAL OR STATE WATERS

This document identifies the procedures and best management practices (BMPs) that SDG&E proposes to implement at the structure sites, wire stringing sites, and construction yard where SDG&E is requesting authorization to conduct refueling in and/or within 200 feet of waters of the United States and waters of the State. Photographs of a simulated fueling operation are included at the end of this attachment.

PROCEDURES AND BMPs AT SITES FOR STRUCTURES WITH CONVENTIONAL FOUNDATIONS

These procedures and BMPs will apply to two sites (EP324 and EP323-1) that are included in the in-waters refueling amendments to the 404 and 401 and to 59 additional sites included in the 401 amendment for refueling with 200 feet of waters (see Attachment A).

Fueling Procedures

Fueling for Conventional Foundations and Steel Erection equipment, such as auger drills, cranes, and forklifts, is accomplished by bringing a pickup truck with a fuel transfer tank on to the site. These fuel transfer tanks have a maximum capacity of 95 gallons, although most carry between 65 and 86 gallons of diesel fuel. The piece of equipment is then fueled using the fuel transfer tank.

Secondary Containment and Impervious Protection

Two types of secondary containment are proposed based on the type of equipment for which they will be utilized. These two containment versions are “Rubber-Tired” and “Tracked.”



The equipment sets on top of construction-grade plastic sheeting (commonly referred to as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. If the tracked piece of equipment is a drill rig, the plastic will also need to extend beyond the auger to catch any drips from the auger. The Visqueen will be bermed in the same manner as the plastic for the rubber-tired equipment.

The minimum thickness of Visqueen used at the EP324 and EP323-1 sites (in waters) will be 8 mm. The minimum thickness of Visqueen used at the other 59 sites with conventional foundations covered by the 401 amendment will be 6 mm. Visqueen of both 6 mm and 8 mm can be driven on by rubber-tired equipment. Typically for most of the larger equipment, SDG&E uses 8 mm Visqueen as an extra protection. In certain cases, such as very heavy rubber-tired equipment, 10 mm Visqueen is used. However, 10 mm Visqueen is not practical for all applications, including sites within waters.

On-Site Fueling BMPs

The Fuel Transfer Tank on the pickup truck is a heavy-duty, reinforced 14 gauge steel with full center baffles for extra strength and stability. It has 2-inch reinforced bungs for long-term use and a lockable filler cap and coupler to regulate pressure. Spill response kits, a minimum of one kit per heavy equipment and one per fuel pickup, are present on site to provide containment and response materials in the event of drips, leaks, and small spills. Because of the containment present at the receiving sources (drill, crane, forklifts, etc.) this provides additional protection in addition to the response materials in the spill kit. Therefore, with the following practices implemented during fuel transfer the best available precautions can be applied to the fueling process. The practices apply to refueling in and within 200 feet of waters, unless otherwise specified.

1. All vehicles and equipment will continue to be inspected and maintained throughout the Project to prevent and minimize any spills and/or leaks.
2. For activities within "waters", fueling will only occur when there is no water present within the jurisdictional area.
3. No fueling will occur during rainfall events.
4. Fueling will only be performed by individuals trained in refueling operations.
5. Fueling at the structure sites where conventional foundations are being constructed and at the wire stringing sites will occur via pickup trucks equipped with fuel transfer tanks. Each fuel transfer tank will have a capacity no greater than 95 gallons. Pickup trucks with fuel transfer tanks will not be allowed to remain at the structure site or wire stringing site overnight.
6. Fueling operations involving fuel transfer tanks will be observed by a minimum of two individuals: one at the point of refueling and one at the fuel tank.

7. Where fueling occurs in waters, one of the observers shall be a environmental monitor on the list(s) of monitors provided to the Corps, SWRCB, and CDFG.
8. A running log will be kept of all refueling operations, including location, personnel responsible, equipment type, start and end time, and total gallons of fuel delivered. This log will also include the date that fueling began at the site and the date that fueling ended at the site.
9. Secondary containment and impervious protection will be required at all fueling locations.
 - a. At conventional foundation sites, the equipment to be fueled will be on top of construction-grade plastic sheeting (commonly known as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. If the tracked piece of equipment is a drill rig, the plastic will extend beyond the auger to catch any drips from the auger and will be bermed.
 - b. The minimum thickness of the Visqueen used for secondary containment shall be 8 mm for fueling locations in waters and 6 mm for fueling locations within 200 feet of waters.
 - c. When refueling from a pickup truck transfer tank, the refuelers will place an absorbent pad underneath the nozzle/spout to capture any stray drips.
10. Equipment will not be overfilled, and room will be left to allow for expansion, especially during times of extreme temperature change.
11. Several 5-gallon spill kits will be kept at each fueling site.

Fueling Frequency and Duration

The frequency and duration of the fueling of equipment at conventional structure sites will be as follows and is the same in and within 200 feet of waters.

Activity Type	Equipment	Fueled From	Frequency	Duration
Steel Assembly/Erection	Truck Crane	Slip Tank	Once per day (at deadend tower sites)	3-4 days per site (at deadends)
Foundations	Drill Rig	Slip Tank	Once per tower site	2-5 days per tower site on average (could be as long as 10-15 days in less than ideal soil conditions)

PROCEDURES AND BMPs AT SITES FOR STRUCTURES WITH MICROPILE FOUNDATIONS

These procedures and BMPs will apply to two sites (EP188 and EP138) that are included in the in-waters refueling amendments to the 404 and 401 and to 55 additional sites included in the 401 amendment for refueling with 200 feet of waters (see Attachment A).

Fueling Procedures

Micropile drilling is completed on-site using certain essential pieces of equipment which require refueling. These pieces of equipment are the drilling rig equipment, air compressors, and generators. The equipment is fueled using a 200 gallon fuel transfer cell with secondary containment. For smaller fuel amounts, 5-gallon safety cans are used to transfer the fuel. The 200 gallon fuel transfer cell is taken offsite to a staging yard for refueling, when needed.

Secondary Containment and Impervious Protection

A typical micropile setup looks as follows (photos not from the Sunrise Project):



The drilling equipment and, as needed due to terrain, the support equipment sit on platforms. The generator sets inside an impervious aluminum box for secondary containment purposes. The fuel cell for the drilling rig also sets inside an impervious aluminum box. The air compressor sets on top of construction-grade plastic sheeting (commonly referred to as Visqueen), but because it is placed vertically down on the Visqueen and because it does not move once set there is little chance of rips or tears forming. Visqueen for sites where the setup will be in a waterway will require a minimum 8 mm thickness. Those sites within the 200-foot buffer of waters but not the waterways themselves, will require a minimum 6 mm thickness.

On-Site Fueling BMPs

The 200 gallon fuel cell is double-walled steel, which provides its secondary containment. Micropile crews carry a minimum of two 5-gallon spill response kits. Spill response kits provide containment and response materials in the event of drips, leaks, and small spills. Because of the secondary containment present at all the receiving sources (drill, generator, compressor) and the originating source (fuel cell) additional protection is provided in the very unlikely event of a large leak or spill. Therefore, with the following practices implemented during fuel transfer the best available protections can be applied to the fueling process. Except as noted, the practices apply to fueling in and within 200 feet of waters at micropile foundation sites.

1. All vehicles and equipment will continue to be inspected and maintained throughout the Project to prevent and minimize any spills and/or leaks.
2. For activities within “waters”, fueling will only occur when there is no water present within the jurisdictional area.
3. No fueling will occur during rainfall events.
4. Fueling will only be performed by individuals trained in refueling operations.
5. Fueling at the structure sites where micropile foundations are being constructed will occur using a 200 gallon fuel transfer cell with secondary containment. For smaller fuel amounts, 5-gallon safety cans may be used to transfer the fuel. The fuel cell will be placed on or near the platform(s) that are active (i.e., at the foundation leg(s) where construction is underway). The fuel cell will remain onsite until it needs to be refilled (typically once per day). If kept onsite overnight, fuel cells will be kept on the platform (above waters), preferably in a location outside of waters. The cell will be taken offsite to a staging yard for refueling, when needed.
6. Fueling operations involving fuel cells will be observed by a minimum of two individuals: one at the point of refueling and one at the fuel tank or fuel cell. The transfer of fuel from a 5-gallon gas to equipment may be observed by one individual.
7. Where fueling occurs in waters, one of the observers shall be an environmental monitor on the list(s) of monitors provided to the Corps, SWRCB, and CDFG.
8. A running log will be kept of all refueling operations, including location, personnel responsible, equipment type, start and end time, and total gallons of fuel delivered. This log will also include the date that fueling began at the site and the date that fueling ended at the site.
9. Secondary containment and impervious protection will be required at all fueling locations.
 - a. At micropile sites, the drilling rig is on a platform, and the fuel cell will sit inside an impervious aluminum box. The generator sits inside an impervious aluminum box, which provides secondary containment. The air compressor sits on top of Visqueen.
 - b. The minimum thickness of the Visqueen used for secondary containment shall be 8 mm for fueling locations in waters and 6 mm for fueling locations within 200 feet of waters.

- c. When refueling from a 200-gallon fuel cell or 5-gallon gas can, the refuelers will place an absorbent pad underneath the nozzle/spout to capture any stray drips.
- 10. Equipment will not be overfilled, and room will be left to allow for expansion, especially during times of extreme temperature change.
- 11. Several 5-gallon spill kits will be kept at each fueling site.

Fueling Frequency and Duration

The frequency and duration of the fueling of equipment at micropile sites will be as follows and is the same in and within 200 feet of waters.

Activity Type	Equipment	Fueled From	Frequency	Duration
Crux (micropile)	Drilling Equipment	200 gal Fuel Cell	Once per day	5-10 days per site
	Generator	200 gal Fuel Cell	Once per day	5-10 days per site
	Air Compressor	200 gal Fuel Cell	Once per day	5-10 days per site

PROCEDURES AND BMPs AT WIRE STRINGING SITES

These procedures and BMPs will apply to the four wire stringing sites at (EP313, EP292-1, EP255-2, and EP226-1) that are included in the in-waters refueling amendments to the 404 and 401 and to 25 additional sites included in the 401 amendment for refueling with 200 feet of waters (see Attachment A).

Fueling Procedures

Fueling for Wire Stringing equipment, such as puller trucks, tensioning machines, and CAT dozers, is accomplished by bringing a pickup truck with a fuel transfer tank on to the site. These fuel transfer tanks have a maximum capacity of 95 gallons, although most carry between 65 and 86 gallons of diesel fuel. The piece of equipment is then fueled using the fuel transfer tank. The operation will be accomplished in a similar manner as depicted in the photos at the end of this attachment.

Secondary Containment and Impervious Protection

Two types of secondary containment are proposed based on the type of equipment for which they will be utilized. These two containment versions are “Rubber-Tired” and “Tracked.”



Wire Pulling and Tensioning Site



Small Wire Reel Truck

The equipment sets on top of construction-grade plastic sheeting (commonly referred to as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. The Visqueen will be bermed in the same manner as the plastic for the rubber-tired equipment. Visqueen for sites where the setup will be in a waterway will require a minimum 8 mm thickness. Those sites within waterway buffers but not the waterways themselves will require a minimum 6 mm thickness.

On-Site Fueling BMPs

The Fuel Transfer Tank on the pickup truck is a heavy-duty, reinforced 14 gauge steel with full center baffles for extra strength and stability. It has 2-inch reinforced bungs for long-term use and a lockable filler cap and coupler to regulate pressure. Spill response kits, a minimum of one kit per piece of heavy equipment and one per fuel pickup, are present on site to provide containment and response materials in the event of drips, leaks, and small spills. Because of the containment present at the receiving sources (puller trucks, tensioning machines, dozers, etc.) this provides additional protection in addition to the response materials in the spill kit. Therefore, with the following practices implemented during fuel transfer the best available precautions can be applied to the fueling process:

1. All vehicles and equipment will continue to be inspected and maintained throughout the Project to prevent and minimize any spills and/or leaks.
2. No fueling will occur during rainfall events.
3. Fueling will only be performed by individuals trained in refueling operations.
4. Fueling at the wire stringing sites will occur via pickup trucks equipped with fuel transfer tanks. Each fuel transfer tank will have a capacity no greater than 95 gallons. Pickup trucks with fuel transfer tanks will not be allowed to remain at the structure site or wire stringing site overnight.

5. Fueling operations involving fuel transfer tanks will be observed by a minimum of two individuals: one at the point of refueling and one at the fuel tank or fuel cell. The transfer of fuel from a 5-gallon gas to equipment may be observed by one individual.
6. Where fueling occurs in waters, one of the observers shall be an environmental monitor on the list(s) of monitors provided to the Corps, SWRCB, and CDFG.
7. A running log will be kept of all refueling operations, including location, personnel responsible, equipment type, start and end time, and total gallons of fuel delivered. This log will also include the date that fueling began at the site and the date that fueling ended at the site.

8. Secondary containment and impervious protection will be required at all fueling locations.
 - a. At wire stringing sites, the equipment to be fueled will be on top of construction-grade plastic sheeting (commonly known as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. If the tracked piece of equipment is a drill rig, the plastic will extend beyond the auger to catch any drips from the auger and will be bermed.
 - b. The minimum thickness of the Visqueen used for secondary containment shall be 8 mm for fueling locations in waters and 6 mm for fueling locations within 200 feet of waters.
 - c. When refueling from a pickup truck transfer tank, the refuelers will place an absorbent pad underneath the nozzle/spout to capture any stray drips.
9. Equipment will not be overfilled, and room will be left to allow for expansion, especially during times of extreme temperature change.
10. Several 5-gallon spill kits will be kept at each fueling site.

Fueling Frequency and Duration

The frequency and duration of the fueling of equipment at wire stringing sites (aka pull sites) will be as follows and is the same in and within 200 feet of waters.

Activity Type	Equipment	Fueled From	Frequency	Duration
Wire Pulling	Puller/Tensioner	Slip Tank	Once every other day (i.e. typically once or twice per wire pull if the pull lasts longer than a day.)	2-7 days per wire pull
Wire Sleaving	CAT Dozer	Slip Tank	At most, once per sleeve site. On average, a sleeve site can be completed without fueling, but any delays to completion of the operation would require one-time fueling.	1-2 days

PROCEDURES AND BMPs FOR THE HOA IN CYS2

1. The HOA will be used in connection with the flight, staging, refueling, and any required maintenance of light and medium duty helicopters used in support of the construction of approximately 39 towers.
2. No helicopters will be stored or staged overnight within the HOA.
3. Light and medium duty helicopters will be refueled via a 7800-gallon capacity fuel truck.
4. The truck will access the HOA via the Equipment Storage/Refueling Area (see figure below)
 - a. Refueling operations will use a closed system with the fuel nozzle affixed securely with a seal to the fueling port.
 - b. The refueling will be done by two individuals to further prevent the chance of spills. One individual will be stationed at the emergency fuel shutoff valve on the fueling truck and one individual will be stationed at the fuel nozzle with absorbent spill cleanup materials for prompt response, should a spill occur.
 - c. The helicopter operations and refueling area will be graded level and rock will be placed on the surface to reduce dust emissions from rotor wash. This rocked surface will also help to prevent migration of hydrocarbons into the underlying soil, should a fuel spill occur.
 - d. An earthen berm, approximately 12 inches high, will also be constructed around the perimeter of the helicopter operation and refueling area. This earthen berm will act as a barrier to prevent fuel or hazardous materials from entering a jurisdictional water in the event of a large release during refueling operations.
5. The Refueling and Equipment Storage Area (approximately 0.88 acre) will be used to stage, store, and refuel large equipment such as boom trucks, cranes, forklifts, water trucks, fuel storage, and any other equipment containing hazardous materials. It is accessed directly off of an existing paved BLM road that runs along the western boundary of the yard. Except for a small area that overlaps the HOA, all of this area is outside the 200-foot buffers of adjacent jurisdictional waters. BLM has already authorized use of road to access the area. The 401 amendment that covers the HOA would authorize refueling, storage, and staging of equipment in the overlap area.
6. The Water Tanks and Gas System Area (approximately 0.22 acre) will be used to store water tanks and fuel for the gas pump system for the tanks. As shown on in the figure below, the area is entirely outside the 200-foot buffer of adjacent jurisdictional waters. The area can be accessed directly off of the existing paved BLM road. Rather than transport fuel trucks across jurisdictional waters within CY-S2, SDG&E proposes to access the area off the BLM road and to transport equipment, including fuel trucks, along the road between the two entrances to S2. SDG&E has requested that BLM authorize the second access and use of the road between the two entrances.

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Simulation of Fueling Operation

The following pictures represent the process that would be implemented for fueling in or within 200 feet of Federal or State Waters. These photographs have been staged for illustration purposes. They do not represent actual events.



The above picture depicts a piece of rubber-tired equipment (in this case, a steel erection crane) set up on 6 mm construction-grade visqueen with bermed edges. For refueling within waterways (not just waterway buffers) a tertiary containment will be placed inside the containment and the tertiary containment will be made of 8 mm construction-grade visqueen. You can see the tertiary containment within the secondary containment in the above photo.



The above picture depicts a pickup truck with a fuel transfer tank. The trained refueler at the transfer tank is monitoring the tank as fuel is dispensed.



The above picture depicts the trained refueler who is on the fueling end of the operation. He is monitoring the fuel being placed into the tank. Absorbent pads are below the fuel nozzle to catch any drips, in addition to absorbent pads placed within the tertiary containment. (For refueling near waterways, the absorbent pads will be placed in the secondary containment below the fueling location).



The above picture shows the tertiary containment inside the secondary containment. The pads are in place below the fueling location. Tertiary containment would only be utilized for fueling within waterways. Secondary containment would be utilized for fueling within waterway buffers.



The above picture shows the refueler returning the fuel nozzle to the fuel transfer tank and his counterpart at the transfer tank. Absorbent pads are utilized to ensure no stray drips of fuel hit the ground during this transfer.

ATTACHMENT C

SITES AND PROPOSED MEASURES FOR AMENDED CONDITION 22 OF THE NWP 12 AUTHORIZATION

This document identifies the structure sites and wire stringing sites included in the proposed modification to Condition 22 of the applicable NWP 12 authorizations to allow refueling in “waters of the US” at these locations. No fill or discharge of fill will occur as a result of this proposed modification. It also identifies the procedures and best management practices (BMPs) that SDG&E proposes to implement at the refueling locations on these sites. Figures from the Mapbook depicting the sites are included as JPEG images at the end of the attachment (see Mapbook for 11x17 maps).

SITES

The amendment of Condition 22 of the applicable NWP 12 authorizations would allow:

- Refueling within waters of the US at the 8 sites identified below; and
- Storage of 200-gallon fuel transfer cells on platforms (above waters) at EP188-1 and EP138-2.

SDG&E also is seeking a 401 amendment to allow refueling in waters at the same 8 sites. The proposed 401 amendment also would allow refueling within 200 feet of waters at 6 of the sites (see list below).

MEASURES

To minimize and monitor the potential for impacts to waters from refueling at the 8 sites, SDG&E proposes to implement the following measures:

1. Refueling in waters will be allowed only at the 8 specified sites.
2. All vehicles and equipment will continue to be inspected and maintained throughout the Project to prevent and minimize any spills and/or leaks.
3. Fueling will only occur when there is no water present within the jurisdictional area.
4. No fueling will occur during rainfall events.
5. Fueling will only be performed by individuals trained in refueling operations.
6. Fueling at the two structure sites with conventional foundations (EP324 and EP323-1) and at the four wire stringing sites (at EP313/314, EP292/291, EP255, and EP226/225) will occur via pickup trucks equipped with fuel transfer tanks. Each fuel transfer tank will have a capacity no greater than 95 gallons. Pickup trucks with fuel transfer tanks will not be allowed to remain at the structure site or wire stringing site overnight.

7. Fueling at the two structure sites with micropile foundations (EP188-1 and EP138-2) will occur using a 200 gallon fuel transfer cell with secondary containment. For smaller fuel amounts, 5-gallon safety cans may be used to transfer the fuel. The fuel cell will be placed on or near the platform(s) that are active (i.e., at the foundation leg(s) where construction is underway). The fuel cell will remain onsite until it needs to be refilled (typically once per day). If kept onsite overnight, fuel cells will be kept on the platform (above waters), preferably in a location outside of waters. The cell will be taken offsite to a staging yard for refueling, when needed.
8. Fueling operations involving fuel transfer tanks or fuel cells will be observed by a minimum of two individuals: one at the point of refueling and one at the fuel tank or fuel cell. The transfer of fuel from a 5-gallon gas to equipment may be observed by one individual.
9. Where fueling occurs in waters, one of the observers shall be an environmental monitor on the list(s) of monitors provided to the Corps, SWRCB, and CDFG.
10. A running log will be kept of all refueling operations, including location, personnel responsible, equipment type, start and end time, and total gallons of fuel delivered. This log will also include the date that fueling began at the site and the date that fueling ended at the site.
11. Secondary containment and impervious protection will be required at all fueling locations at the 4 structure sites and 4 wire stringing sites.
 - a. At the conventional foundation structure sites and wire stringing sites, the equipment to be fueled will be on top of construction-grade plastic sheeting (commonly known as Visqueen). For rubber-tired equipment, the edges of the plastic will be wide enough to cover the width of the equipment and wrap around a straw wattle, piece of cribbing, or pipe to create a bermed containment area to catch any leaks. For tracked equipment, the Visqueen will be placed inside the tracks and extend from the back to the front of the unit. If the tracked piece of equipment is a drill rig, the plastic will extend beyond the auger to catch any drips from the auger and will be bermed.
 - b. At the micropile sites, the drilling rig is on a platform, and the fuel cell will sit inside an impervious aluminum box. The generator sets inside an impervious aluminum box, which will provide secondary containment. The air compressor sets on top of Visqueen.
 - c. The minimum thickness of the Visqueen used for secondary containment shall be 8 mm for fueling locations in waters.
 - d. When refueling from a pickup truck transfer tank, 200-gallon fuel cell, or 5-gallon gas can, the refuelers will place an absorbent pad underneath the nozzle/spout to capture any stray drips.
 - e. Equipment will not be overfilled, and room will be left to allow for expansion, especially during times of extreme temperature change.
 - f. Several 5-gallon spill kits will be kept at each fueling site.

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters	Pending Variance as of 8/22/11
X		EP324	Conventional	MS-12	22	12-DW-2	Yes	
X		EP323-1	Conventional	MS-12	22	12-DW-2	Yes	
X	X	EP313PS	NA	MS-15	25	14-DW-25 14-DW-26 15-DW-5 15-DW-6 15-DW-8 15-DW-9 15-DW-12 15-DW-13 15-DW-14 15-DW-15 15-DW-16 15-DW-17	Yes	
X	X	EP291/EP292 PS	NA	MS-21	35	21-DW-2 21-DW-3 21-DW-6 21-DW-7 21-DW-8	Yes	
X	X	EP255 PS A&B	NA	MS-35	NA/41/42/NA	35-S-5 35-S-6 35-S-7 35-S-8 35-S-10	Yes	

In Waters 404 & 401 Amd	Within 200 ft of Waters 401 Amd	Site ID	Foundation Type	HMMP Mapsheet #	Single and Complete Project #	Waters within 200 Feet	Portion of Site Crossed by Waters	Pending Variance as of 8/22/11
X	X	EP225/EP226 PS	NA	MS-42	48	42-S-1	Yes	
X	X	EP188-1	Micropile	MS-53	63	53-S-13 53-S-14 53-S-15 53-S-18 53-S-19	Yes	
X	X	EP138-2	Micropile	MS-62	80/81	62-S-1 62-S-2 62-S-3	Yes	













