

**SAN FRANCISCO PUBLIC UTILITIES COMMISSION
INFRASTRUCTURE CONSTRUCTION
MANAGEMENT PROCEDURES**

**SECTION: SFPUC INFRASTRUCTURE
CONSTRUCTION MANAGEMENT**

APPROVED: 

PROCEDURE NO: 040

DATE: 6/7/2019

**TITLE: MONTHLY ENVIRONMENTAL
COMPLIANCE REPORT**

REVISION: 1

1.0 Policy

During construction, Monthly Environmental Compliance Reports will be prepared to provide the status of project environmental compliance and significant environmental events to program, regional, and other project management staff. This procedure applies to all personnel working on the SFPUC Infrastructure Construction Management (CM) Program to the extent that their work is affected by these CM Procedures and does not conflict with specific San Francisco Public Utilities Commission (SFPUC) policies or the Contract under which the Work is executed.

2.0 Description

This procedure describes the process by which the Monthly Environmental Compliance Report is prepared by the Environmental Compliance Manager (ECM). Attachment 040-1 to this procedure is an example of a Monthly Environmental Compliance Report detailing the format and typical language.

3.0 Definitions

3.1 Construction Management Information System (CMIS)

The CMIS is an on-line management tool for the efficient and effective storage and retrieval of various documents generated during a construction project. Processing of environmental procedures will utilize the CMIS Environmental Daily Inspection Reports module and the Non-compliance Notices module, which are process-specific portions of the CMIS application designed to facilitate the processing of environmental

procedures; retention of data pertinent to environmental inspection, specialty environmental monitoring, and environmental non-compliance notices; and reporting of these processes and their status. The CMIS is also designed for Contractor entry and RE response directly into the system.

3.2 Monthly Environmental Compliance Report

The Monthly Environmental Compliance Report is a required report prepared by the ECM. These reports will be part of the official project records. The Monthly Environmental Compliance Report will include seven (7) key sections:

- 3.2.1 Summary of Environmental Compliance Activities and Significant Environmental Events;
- 3.2.2 Pertinent Project Photographs;
- 3.2.3 Environmental Daily Inspection Report Summary Table;
- 3.2.4 Non-Compliance, Non-Conformance Notice, Minor Problem, and Incident Summary Table;
- 3.2.5 Minor Project Modification Summary Table;
- 3.2.6 Summary of Public Complaints;
- 3.2.7 Mitigation Monitoring and Reporting Program Summary (i.e., one month of data in the updated Environmental Quarterly Compliance Reporting Table). Attachment 041-2 to this procedure is an example of a Quarterly Compliance Reporting Table heading format.

3.3 Mitigation Monitoring and Reporting Program (MMRP)

The MMRP includes 1.) the California Environmental Quality Act (CEQA) mitigation measures, 2.) means of implementing and enforcing mitigation measures, and 3.) means of monitoring or reporting on the implementation and enforcement of mitigation measures. The MMRP was prepared to ensure that mitigation measures imposed to mitigate or avoid significant environmental effects are implemented in compliance with the Public Resources Code section 21081 and CEQA Guidelines.

3.4 Environmental Requirements Table

The Environmental Requirements Table is a management tool that is used by the ECM to track the status of project environmental compliance. The table includes the MMRP as well as certain requirements contained in the environmental permits. Refer to CM Procedure No. 036.

3.5 Quarterly Compliance Reporting Table

The Quarterly Compliance Reporting Table is a formal report prepared by the ECM during construction. This report is a result of modifying the

Environmental Requirements Table to provide the required status of project environmental compliance. Refer to CM Procedure No. 041.

4.0 Responsibilities

4.1 Environmental Construction Compliance Manager (ECCM)

At the program level, the ECCM is responsible for overseeing the effectiveness of program-wide environmental compliance activities. The ECCM is responsible for reviewing all Monthly Environmental Compliance Reports in order to keep informed of the status of project environmental compliance including non-compliance issues and the status of the resolution of non-compliances.

4.2 Environmental Compliance Manager (ECM)

The ECM is responsible for preparing the Monthly Environmental Compliance Report with assistance from the EC and Environmental Inspector(s).

4.3 Environmental Coordinator (EC)

The EC is responsible for assisting the ECM with preparation of Monthly Environmental Compliance Report.

4.4 Environmental Inspectors

Environmental Inspectors are responsible for assisting the ECM with the preparation of the Monthly Environmental Compliance Report.

5.0 Implementation

5.1 Initiation

The ECM, in coordination and with assistance from the Environmental Inspector(s) and EC, will prepare a draft status report for monthly submittal within three (3) working days of the last day of each reporting month. The ECM and ECCM will set the due date for the first report at the start of each project based on the start of environmental compliance activities in the field (i.e., start of environmental inspection and/or specialty environmental monitoring).

5.2 Summary of Environmental Compliance Activities and Significant Environmental Events

Environmental Inspector(s) will assist the ECM in the preparation of the Monthly Environmental Compliance Report by providing a summary of project environmental compliance and significant environmental events. This brief summary should draw from the Environmental Inspector's Daily Environmental Inspection Report(s), (refer to CM Procedure 043), and

Specialty Environmental Monitoring Logs, (refer to CM Procedure No. 042), and include the items below:

- Summary of project environmental compliance status;
- Summary of Specialty Environmental Monitoring activities; and
- Summary of other important environmental events and issues (e.g., cultural resource or paleontological resource discoveries).

5.3 Project Photographs

Include three (3) project photographs that provide an overview of selected project activities related to the Mitigation Monitoring and Reporting Program.

5.4 Environmental Daily Inspection Report Summary Table

The EC will utilize the CMIS database to generate a table that lists the total number of Daily Environmental Inspection Reports for the current reporting period and the cumulative number of reports to date. The report numbers will be identified by compliance level (i.e., acceptable, communication, minor problem, incident and environmental non-compliance/Non-Conformance Notices). A sample table follows:

Compliance Level	No. of Reports during Current Reporting Period	Cumulative to Date
Acceptable	87	463
Communication	16	98
Incident	2	5
Minor Problem	0	2
Non-Compliance and Non-Conformance Notice	1	6
Total Reports	106	574

5.5 Environmental Non-Compliance, Non-Conformance Notice, Minor Problem, and Incident Summary Table

The ECM will compile this table that identifies the Non-compliance and Non-Conformance Notices for the reporting period and the status of follow-up/corrective action activities. The table will also include a summary of Minor Problems and Incidents for the reporting period. Refer to CM Procedure 038.

5.6 Environmental Minor Project Modifications Summary Table

The ECM will compile this table that identifies Minor Project Modifications that were submitted and approved during the reporting period, and pending Environmental Minor Project Modifications from previous reporting periods and Minor Project Modifications that have been denied. Refer to CM Procedure 039.

5.7 Summary of Public Complaints

The ECM will identify complaints received during the reporting period and the status of efforts to resolve complaints in a manually compiled table.

5.8 Mitigation Monitoring and Reporting Program Summary

The ECM will modify the Environmental Requirements Table (refer to CM Procedure No. 036 Environmental Requirements Table) to produce compliance status for the overall Environmental Quarterly Compliance Reporting Table (refer to CM Procedure No. 041, as only one month of data for the Environmental Quarterly Compliance Reporting Table will be shown).

The Environmental Quarterly Compliance Reporting Table will include updates to the following:

5.8.1 Completion Status (C/NC/O) (enter date if complete) – This column provides the current mitigation measure or status with “C” for complete; “NC” for not complete; or “O” for ongoing as explained below:

- “C” should be entered along with the date that each mitigation measure has been completed or satisfied. For example if a Contractor’s Nighttime Lighting Plan submittal has been finalized/approved by SFPUC then enter complete (“C”) and the date that the submittal was deemed complete.
- “O” should be entered for mitigation measures that are ongoing. If a mitigation measure is associated with the construction phase of the project then most likely that mitigation measure would be documented as ongoing during the construction phase. For example, if the mitigation measure requires documentation of compliance with the Nighttime Lighting Plan

then that documentation would be required during the construction phase and is therefore ongoing (“O”).

- “NC” should be entered for mitigation measures that are not complete or are not currently in progress. Generally, this entry would be associated with mitigation measures or permit submittals that are required for a subsequent phase of the project. For example, many permits require agency notifications at the completion of a project such that for these types of requirements the status would be entered as not complete (“NC”) until the submittal is completed. Another example of a “NC” entry would be a mitigation measure that is to be completed post-construction (i.e., monitoring) such that during the construction phase this mitigation measure would be reported as “NC”.
- If the “Completion Status” doesn’t apply to a measure, then enter “N/A”. For example, if the mitigation measure requires submittal of an archaeological data recovery program when an unanticipated discovery occurs, enter N/A if no unanticipated discoveries have occurred to date.

5.8.2 Compliance Level (A, GA, U)/Supporting Document (EDIR, DML) or Notes – As applicable, this column identifies whether or not activities are being performed in compliance with the mitigation measure (i.e., Acceptable (“A”), Generally Acceptable (“GA”), or Unacceptable (U):

- “A” is entered if there are no non-compliances or Non-Conformance Notices for the reporting period.
- “GA” is entered if the activities were generally acceptable with the exception of Environmental Non-compliances or Environmental Non-Conformance Notices as noted in the Environmental Non-Compliance column(s).
- “U” is entered if all the activities related to this mitigation activity were unacceptable (e.g., ongoing environmental compliance issues, multiple Environmental Non-Conformance Notices related to a mitigation measure, or a required permit submittal or Contractor plan not completed prior to construction as required).
- Additionally, this column identifies the relevant supporting documentation for making the A, GA, or U determination:
 - DML – Daily Environmental Monitoring Logs prepared by Specialty Environmental Monitors. Refer to CM Procedure No. 042.

- EDIR – Daily Environmental Daily Inspection Reports prepared by Environmental Inspector(s). Refer to CM Procedure No. 043.
- Other – If another document provides supporting documentation it should be noted.

5.8.3 Environmental Non-Compliance and Environmental Non-Conformance Notices related to environmental mitigation measures or permits should be entered into this column. The Environmental Non-Compliance or Environmental Non-Conformance Notice document control number should be entered followed by a brief explanation of the environmental non-compliance, and any follow-up or environmental corrective action that has been performed to date including agency notifications if required. Also document if the non-compliance has been resolved.

5.9 ECM Draft Submittal

As previously noted, the ECM will prepare a draft status report for monthly submittal within three (3) working days of the last day of each reporting month.

5.10 ECCM Review

The ECCM reviews the Monthly Environmental Compliance Report for completeness and conformance to this procedure and, if necessary, returns to the ECM for revision(s) within three (3) working days. If complete and in conformance with this procedure, the ECCM will email the ECM.

5.11 ECM Final Submittal

The ECM revises per the ECCMs comments and submits the final Monthly Environmental Compliance Report to the Senior CM, Senior PM, RE, ECCM, and ADCS within two (2) working day of having received comments back from the ECCM

6.0 Other Procedural Requirements

None

7.0 References

7.1 Technical Specifications

None

7.2 SFPUC Infrastructure CM Procedures

No. 036	Environmental Requirements Table
No. 038	Environmental Non-Conformance Notice
No. 039	Environmental Minor Project Modification
No. 040	Monthly Environmental Compliance Report
No. 041	Environmental Quarterly Compliance Reporting Table
No. 042	Daily Environmental Monitoring Logs
No. 043	Environmental Daily Inspection Report

7.3 Other

None

8.0 Attachments

040 - 1	Monthly Environmental Compliance Report Format (includes examples)
040 - 2	Quarterly Compliance Reporting Table Heading Sample Format
040 - 3	Revision Control Log

Attachment 040 – 1

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Monthly Environmental Compliance Report Format (includes examples)

MONTHLY ENVIRONMENTAL COMPLIANCE REPORT

SUBMITTAL DATE:

PROJECT NAME: Fictional Pipeline Example Project

PROJECT NUMBER: CUW

CASE NUMBER:

REPORTING PERIOD:

REPORT NUMBER: x

REPORT PREPARED BY: _____ Title: _____

_____ Title: _____

_____ Title: _____

Summary of Environmental Compliance Activities and Significant Environmental Events
[As noted in the Project Procedures, this should include a summary of compliance events, summary of specialty monitoring activities, and a summary of other important environmental events and issues (e.g., cultural resource or paleontological resource discoveries).]

Pipeline Spread No.1 – Hayward to Middlefield Commons

Crews continued excavation of trenchline from Station 10+10 (near the golf course) to Station 500+35 (near Pumpstation A). Prestressed Concrete Cylinder Pipe was staged along the right-of-way and laid into the trench and as of the end of August backfilling activities have been completed from Station 10+10 to Station 320+40. Restoration contractor mobilized to the site last week to begin hydroseeding and transition to more permanent erosion control methods along backfilled sections of the right-of-way. During this reporting period crews were compliant with the project environmental requirements. Activities stayed within the approved work area, all refueling was performed at the yard, and all workers received environmental training prior to starting work.

Pumpstation A – Pumpstation Retrofit

Throughout the month the retrofit crew worked on pumpstation foundation stabilization. The south wall was excavated approximately 10 feet below grade, degraded concrete was removed, the surfaces roughened, and then rebar cages and wooden forms were installed. By mid August concrete delivery trucks were pouring concrete for the foundation improvement. Concrete pouring was completed by the third week and for the remainder of the month the crew worked on internal strengthening to the pumpstation building. All concrete trucks were observed washing out in the approved washout location (plastic lined strawbale structure). The site was well watered to prevent fugitive dust and trash pickup has improved from the prior monthly report. No fuel was spilled, a spill kit was observed onsite, and the CM Project Manager will remind all foremen of the importance of proper refueling at the next weekly meeting. No other compliance issues were noted during the month.

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Monthly Environmental Compliance Report Format (includes examples)

Raptor Nest Monitoring

Monitoring of the raptor nest noted in July approximately 250 feet from the staging area off Aves Landing Road continued throughout the month. The pair and chick appear to not be effected by the trucks and yard generators.

Project Photographs

The following photos provide an overview of selected project activities and representative views of activities related to the Mitigation Monitoring and Reporting Program. To view all photos taken during this reporting period refer to the Environmental Daily QA Inspection Reports.

Date	Report Number	Photo	Description/Comments
1/08/08	21-5590		Facing northeast; raptor buffer zone signage in the ROW at Station 150+00.
1/10/08	29-3053		Facing north; dewatering into the Big River at the south portal.
1/17/08	33-0987		Facing north; workers scooping up fluid contaminated soil.

Attachment 040 – 1

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Monthly Environmental Compliance Report Format (includes examples)

Environmental Daily QA Inspection Report Summary Table

[Insert numbers produced from the Construction Management Information System for all levels except Non-Compliance Notice which will have to be tracked separately by the RECM.]

Compliance Level	No. of Reports During Current Reporting Period	Cumulative to Date
Acceptable	87	463
Communication	16	98
Incident	2	5
Minor Problem	0	2
Non-Compliance and Non-Compliance Notice	1	6
Total Reports	106	574

Attachment 040 – 1

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Monthly Environmental Compliance Report Format (includes examples)

Non-Compliance, Non-Compliance Notice, Minor Problem, and Incident Summary Table
[The REC will compile this table that identifies the Non-Compliance Notices for the reporting period and the status of follow-up/corrective action activities. The table will also include a summary of Minor Problems and Incidents for the reporting period.]

The following table summarizes Non-Compliance Notices, minor problems, and incidents reported by the Environmental Inspector during this reporting period.

Date	Report Number	Location (Station Number)	Description	Date Resolved	Resolution
Non-Compliance and Non-Compliance Notice					
1/08/08	22-1990	212+00	Three construction workers viewed the Swainson's hawk (SWHA) nesting location from within the buffer zone (100 feet northeast of Station 150+00). None displayed the environmental training sticker on their construction helmets. Environmental Inspector confirmed they had not been through the environmental training course.	1/09/08	Construction workers attended the environmental training and were informed of the SWHA buffer zone requirements.
Minor Problem					
1/12/09	29-1098	150+00	During grading operations, subsoil was placed 5 feet outside the staked project boundary for a length of approximately 30 feet in a cultivated field.	1/13/09	Contractor retrieved spoil and crew received a tailgate training on the importance of staying within the approved work limits.
Incident					
1/17/08	23-9087	145+50	Fluid leaked onto four separate areas on the ground from an excavator that was working on a vault on the south side of the portal.	1/17/08	The fluid leak was cleaned up shortly after.

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Monthly Environmental Compliance Report Format (includes examples)

Minor Project Deviation Summary Table

[The RECM will manually compile a table that identifies Minor Project Deviations that were submitted and approved during the reporting period as well as any Minor Project Deviation that are pending from previous reporting periods].

Minor Project Deviation #	Variance Level 1 or 2	Summary of Request	Approval Status
MPD 1	2	Request to use extra workspace for storage of excavated spoils. Area is located within 50 feet of Fish Creek. Request made on 01/25/08.	Pending (will require agency approval)
MPD 2	1	Request to use adjacent paved industrial parking area for staging of materials for the Pumpstation A Retrofit. Requested staging area is outside of original project area.	Approved 01/15/08
MPD 3	2	Request to obtain water for dust control from adjacent landowner stockpond outside of the project area. Request denied because biologists were unable to confirm absence of special status species in the pond.	Request Denied 01/21/08

Summary of Public Complaints

[The RECM will identify any complaints received during the reporting period and the status of the resolution of the complaints in a manually compiled table].

Name	Date	Summary of Complaint	Resolution
Mark Able	01/22/08	Mr. Able called because planned traffic delays along Gridloke Avenue caused his son to be late to school and it ruined his perfect attendance record.	Mr. Able was called back that day and told that signage has been in place along the road for two months warning of traffic delays and that he could try to look for an alternate route. Further he was alerted to the fact that roadwork is anticipated to be completed by the end of August.

Mitigation Monitoring and Reporting Program Summary

A table that tracks the compliance status of the project's Mitigation Monitoring and Reporting Program is attached to this report.

[The RECM will modify the Environmental Requirements Table (i.e., hide columns or rows that aren't required for inclusion) to produce compliance status for one month of the overall Quarterly Compliance Reporting Table.]

Attachment 040 - 2

Quarterly Compliance Reporting Table Heading – Sample Format

QUARTERLY COMPLIANCE REPORT TABLE HEADING TEMPLATE SAMPLE (for one month)

Project Name and Case Number:
 Project Number:
 Reporting Period:
 Report Submittal Date:
 Report Preparer's Name and Phone Number:

Mit. No.	Mitigation Measure	Monitoring and Reporting Program	Implementation Schedule				Completion Status (C/NC/O) (if Complete enter date)	Compliance Status August 2008	
		Monitoring & Reporting Actions	Design	Pre-Construction	Construction	Post-Cstr./Monitoring		Compliance Level (A, GA, U) /Supporting Document (EDIR, DML) or Notes	Non-Compliance Notices

LEGEND:

Completion Status:

C - Complete
 NC - Not Complete
 O - Ongoing

Compliance Levels:

A - Acceptable (Entered if there are no non-compliances for the reporting period)

GA - Generally Acceptable (Entered if the activities were generally acceptable for the reporting period with the exception of non-compliances as noted in the non-compliance column(s)).

U - Unacceptable (Entered if all the activities related to this mitigation activity were unacceptable for the reporting period (e.g., non-compliance only or Plan not finalized as required by mitigation measure).

Supporting Document:

DML - Daily Monitoring Log
 EDIR - Environmental Daily Inspection Report

Attachment 040 - 3
Revision Control Log

Revision No.	Revision Date	What changed?
Rev 1	6/7/19	<ul style="list-style-type: none">• Minor format changes;• Attachments revised;• Revision Control Log updated.
Rev 0	11/14/16	Signed