



CONDON-JOHNSON  
& ASSOCIATES, INC.  
CONTRACTORS AND ENGINEERS



## Condon-Johnson & Associates, Inc. - Nicholson Construction Company Joint Venture (CJA-NCC JV)

June 21, 2013

Ben Campbell  
Project Manager  
Barnard-Impregilo-Healy Joint Venture (BIH)  
420 Fourth Street  
San Francisco, CA 94107

SL-095

Phase 2 – Central Subway Tunneling  
Contract No.: 1252  
CJA-NCC Project No.: 21134

RE: Unauthorized Work on June 16<sup>th</sup>, 2013

Dear Ben,

In response to CS CN 1252 Letter No. 183 and your request for specific information to include in your response we offer the following: CJA-NCC, as has been agreed, notifies BIH regarding our weekend work schedule either at the weekly owners meeting held Thursday mornings or at the daily Superintendent meetings held at 3:00PM. On Thursday June 19<sup>th</sup> CJA/NCC developed our plan to assure that we would be ready to jet grout in the south west quadrant of the Moscone work area on the following Monday. Included in that plan was a contingency to work on Sunday June 16<sup>th</sup> if all required work wasn't completed Saturday should it be necessary to make that date. The person who typically relays the schedule update was off work on Friday June 14<sup>th</sup> and Saturday June 15<sup>th</sup> and the person who did deliver the update did not give an accurate description regarding the specifics of the Sunday work. In short the notification was not done. This was entirely avoidable and CJA-NCC takes full responsibility for the lack of proper notification of the Sunday work.

CJA/NCC assures that a situation such as this will not happen again. We recognize the seriousness of the incident and our committed to not hitting utilities by putting forth a procedure to soft dig around known utilities in our work area, including hand excavation and vac trucks as appropriate. We have relayed to all CJA/NCC employees on this project this requirement in no uncertain terms including appropriate disciplinary action if not acted upon. BIH and the Owner shall be made fully aware when we plan to do this or any work that involves excavation near known utilities as we proceed.

As it relates specifically to the gas line at the Moscone South Headwall we plan to locate and install vertical sleeve pipes in place at the headwall locations avoiding the gas line while the excavation is open and exposed prior to paving so that when it is time to come back and core the test locations we will be safe.

CJA/NCC provided a full incident report at the meeting called by the SFMTA on June 17, 2013. We have attached another copy for your files. A history of the USA work ticket #0099022 has also been attached. However, there was no QC checklist filled out prior to the pot holing work. This is unacceptable and will also be rectified in the future. A Job Safety Analysis (JSA) workplan has been developed for this work and is also attached. The CJA/NCC JV insurance has been notified and a claim file established relative to this incident.

Regards,



ON BEHALF OF

Keith Bizzack  
District Manager  
Cell: (510) 714-3878  
CJA-NCC Joint Venture

C: Project File, M. Morris, J. Borup, R. Streets, J. Condon, C. Perkins  
Att: Pothole JSA, USA ticket, 6-16-13 Incident Report