Appendix T

Dust Control Plan

Oberon Renewable Energy Project
DUST CONTROL PLAN

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1.0 Introduction

The objective of the Dust Control Plan (Plan) is to detail practices designed to address potential impacts from construction of the Oberon Renewable Energy Project (project) on public land administered by the Bureau of Land Management (BLM). This Plan has been developed as part of the Plan of Development (POD) and provides guidance to construction and field personnel on measures identified to minimize effects from fugitive dust emissions during construction activities associated with the gen-tie line. It would be the responsibility of IP Oberon, LLC (Proponent) or the project operator at the time and its contractors, working with designated environmental monitors, to comply with measures identified in this document.

The Dust Control Plan:

- Identifies sources of fugitive dust that are anticipated to occur during construction of the gen-tie line,
- Defines the roles and responsibilities of the people that are responsible for implementing the Plan,
- Identifies Best Available Control Measures (BACMs) implemented during construction of the gen-tie line to reduce fugitive dust emissions, and
- Identifies contingency control measures implemented if the BACMs are not adequately controlling fugitive dust.

2.0 Project Location

The Oberon Project is located in Riverside County, north of I-10 and just east and northeast of the town of Desert Center, California on land administered by the BLM, Palm Springs–South Coast Field Office. The Oberon Project would be located on BLM-administered public lands within a Development Focus Area (DFA) pursuant to the Desert Renewable Energy Conservation Plan (DRECP) and associated ROD.

3.0 Project Overview

IP Oberon, LLC, seeks a ROW grant from the BLM to construct, operate, maintain, and decommission a 500 MW solar PV electricity generating station, battery energy storage facility, electrical substation, 500 kV and 34.5 kV gen-tie lines, and associated access roads on approximately 5,000 acres of BLM-administered land in Riverside County, California. The proposed 500 kV gen-tie line would connect the project's solar PV generation and energy storage facility to the existing SCE Red Bluff Substation. Construction would occur over approximately 15 to 20 months, concluding by the fourth quarter of 2023.

4.0 Dust Control

The objective of the Dust Control Plan is to identify potential dust emission sources and provide guidance to construction and field personnel on measures to control the generation of fugitive dust during construction activities. Construction of the solar PV panels, gen-tie lines, ancillary facilities, and associated traffic could directly generate fugitive dust. The following construction-related activities have been identified as having the potential for generating fugitive dust:

- Vehicle and motorized equipment movement on unpaved access roads;
- Grubbing of vegetation;
- Topsoil removal;
- Cutting, filling, and backfilling;
- Trench excavation;
- Bulk material loading, hauling, and unloading;
- Use of material storage piles;
- Use of parking, staging, and storage areas; and
- Track-out onto paved roads.

It is the responsibility of the project contractor(s) and the designated environmental monitor to ensure identification of all sources of dust generation and fugitive dust and minimization of other pollutant emissions.

5.0 Roles and Responsibilities

The Oberon Project would be subject to applicable dust control mitigation measures developed during the National Environmental Policy Act (NEPA) process for construction of the solar facility, gen-tie lines, and ancillary facilities on BLM-administered land. The project is also subject to South Coast Air Quality Management District's (SCAQMD) Rule 403. It would be the responsibility of the Proponent and its contractors, to obtain all necessary permits from the SCAQMD.

Per the definitions in SCAQMD Rule 403, the project construction activities will qualify as "large operations" by containing 50 acres or more of disturbed surface area, and the Proponent or its contractors would need to: submit a fully executed Large Operation Notification (Form 403 N) to the SCAQMD Executive Officer within 7 days of qualifying as a large operation; resubmit the notification annually as long as the project remains a large operation at least 30 days prior to the expiration date defined in a written acceptance by the SCAQMD Executive Officer; identify a dust control supervisor who will be on site or available within 30 minutes during working hours; and notify the SCAQMD Executive Officer within 30 days after the site no longer qualifies as a large operation.

The final mitigation plan would include and implement the specific requirements of SCAQMD Rule 403 and mitigation measures developed during the NEPA process. Note that mitigation measures may also be recommended for implementation in the Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA) to address potential dust emissions from the project on private land.

The following describes the roles and responsibilities of key parties to be involved in all aspects of the Plan. The construction contractor would be the designated fugitive dust control coordinator and would manage implementation of the Plan and be responsible for implementing the fugitive dust control measures specified in the Plan during construction. The dust control coordinator would also:

- Have the Plan available at the construction site at all times during construction and operation,
- Implement the Plan and ensure that all employees, workers, and subcontractors know their responsibilities regarding dust control,
- Monitor construction activity to ensure compliance with the Plan,
- Report incidents, and
- Identify when reasonably available and best available control measures are not adequate and when contingency control measures (e.g., increased watering) shall be implemented.

The project contractor would use environmental monitors to monitor compliance with the Plan. The environmental monitors would be responsible for recording and reporting any incidents related to dust control.

6.0 Fugitive Dust Sources and Best Available Control Measures

Controlling fugitive dust sources would be accomplished through a range of Best Available Control Measures consistent with those specified by SCAQMD Rule 403. Reducing vehicle and equipment speeds on unpaved surfaces, minimizing the amount of new exposed soil/surface disturbance, and periodic application of clean water as directed by the environmental monitors to exposed disturbed surface areas (application of water would be via water trucks) would control fugitive dust during construction. Where application of water is not possible, material stockpiles would be enclosed or covered. In addition, open-bodied trucks transporting materials likely to become airborne would be covered. Earth or other materials that may become airborne would promptly be removed from paved roads. The environmental monitor and dust control coordinator would monitor construction to ensure that dust does not leave the work area and accumulate on adjacent dwellings or roadways. If visible dust dispersion to off-site locations becomes apparent, the environmental monitor would establish a maximum speed limit in dust-prone areas, cover stockpiles, and/or apply additional water to access roads and work areas as necessary, below.

The list below identifies all sources of fugitive dust emissions associated with the project and, for each source identified, the list provides at least one BACM. These potential BACMs can be utilized or installed throughout the construction of the gen-tie line and solar facility.

General

- The operator will maintain the natural topography to the extent possible.
- The operator will follow a construction schedule that specifies the construction of parking lots, laydown areas, and paved roads first whenever feasible.
- The contractor will turn off equipment when it is not in use.
- Where feasible, mowing and rolling techniques will be used to maintain plant root systems for soil stabilization.

Use of Roads and Parking Areas

- The main vehicular access roads to the gen-tie line sites and solar facility will be stabilized with chemical or gravel sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion.
- Unless other limitations apply, traffic speeds on unpaved roads will be limited to 15 miles per hour with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions. Traffic speed signs will be displayed prominently at all site entrances and at egress point(s) from temporary staging and parking areas.
- Traffic on unpaved roads will be restricted to established travel paths or haul routes and stabilized parking lots.
- The main vehicular access roads to the gen-tie line sites and solar facility will be maintained to eliminate track-out extending 25 feet or more in cumulative length onto paved roads from the point of origin from an active operation.

- All track-out from an active operation shall be removed at the conclusion of each workday or evening shift.
- One of the following measures to prevent track-out onto paved roads shall be installed for any active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material: (A) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; (B) Pave the surface extending at least 100 feet and at least 20 feet wide; (C) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide; or, (D) Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

Earth Moving Activities

- When wind speeds exceed 20 miles per hour (mph), construction contractors will minimize new disturbance to the extent possible and/or mobilize additional water trucks to minimize fugitive dust from exposed surfaces.
- Graded site surfaces will be stabilized upon completion of grading when subsequent development is delayed or expected to be delayed more than 30 days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions.

Disturbed Surface Area

- Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
- When feasible, a water truck will be used to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions.
- Disturbance areas will be minimized to the maximum extent feasible.
- For non-road or parking area earthen surfaces, surfaces will be stabilized by compaction, chemical, or other means sufficient to prohibit visible fugitive dust from wind erosion.

Removing and Hauling Soil, Sand, and Other Loss Materials

- Material will be stabilized while loading and unloading to reduce fugitive dust emissions.
- Soil loads will be kept below 12 inches of the freeboard of the truck or will be covered.
- Drop heights will be minimized when loaders dump soil into trucks.
- Gate seals should be tight on dump trucks.

Other Unanticipated Sources

- Use other fugitive dust control measures as necessary to comply with SCAQMD Rules and Regulations that may be implemented.

7.0 Contingency Control Measures for Large Operations

If, after implementation of the BACMs dust emissions have not been reduced to acceptable levels, contingency control measures for large operations would be immediately implemented. Contingency control measures may include additional watering of disturbed areas or soil piles, application or additional applications of soil stabilizers, covering excavated soil piles, temporarily reducing the permitted speed limits, or temporarily suspending the source of the dust emissions until wind speed is reduced.

Table 1. Contingency Control Measures for Large Operations

Fugitive Dust Source Category	Contingency Control Measures
Earth-moving	(1A) Cease all active operations; OR (2A) Apply water to soil not more than 15 minutes prior to moving such soil.
Disturbed surface areas	(0B) On the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days: apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; OR (1B) Apply chemical stabilizers prior to wind event; OR (2B) Apply water to all unstabilized disturbed areas 3 times per day. If there is any evidence of wind driven fugitive dust, watering frequency is increased to a minimum of four times per day; OR (3B) Take the actions specified in SCAQMD Rule 403 Table 2, Item (3c); OR (4B) Utilize any combination of control actions (1B), (2B), and (3B) such that, in total, these actions apply to all disturbed surface areas.
Unpaved roads	(1C) Apply chemical stabilizers prior to wind event; OR (2C) Apply water twice per hour during active operation; OR (3C) Stop all vehicular traffic.
Open storage piles	(1D) Apply water twice per hour; OR (2D) Install temporary coverings.
Paved road track-out	(1E) Cover all haul vehicles; OR (2E) Comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.
All Categories	(1F) Any other control measures approved by the he U.S. EPA as equivalent to the methods specified in SCAQMD Rule 403 Table 3 may be used.

Source: SCAQMD Rule 403 Table 3.