

[FINAL]

Eldorado – Lugo – Mohave Series Capacitor Project

Dust Control Plan

Prepared for
Southern California Edison

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Approved Dust Plan/Permit

Acronyms and Abbreviations

AQ	Air Quality
APM	Applicant Proposed Measure
BLM	Bureau of Land Management
CEQA	California Environmental Quality Act
CPUC	California Public Utilities Commission
DESDAQ	Clark County Department of Environment and Sustainability, Division of Air Quality
kV	Kilovolt
MDAQMD	Mojave Desert Air Quality Management District
MM	Mitigation Measures
MNP	Mohave National Preserve
NPS	National Park Service
OPGW	Optical ground wire
Plan	Dust Control Plan
Project	Eldorado-Lugo-Mohave Capacitor Project
ROW	Right-of-Way
SCE	Southern California Edison
TSP	Tubular steel pole

1 Introduction

This Dust Control Plan (Plan or DCP) for Southern California Edison's (SCE) Eldorado-Lugo-Mohave Series Capacitor Project (Project) presents the activities to be conducted to support compliance with the Applicant-proposed measures (APM) and/or the mitigation measures (MM) listed in Table 1. Compliance with the APMs and MMs will reduce potential fugitive dust impacts resulting from construction of the Project. This Plan is independent of any fugitive dust control plan or permit that may be required by specific local air districts, cities, or counties.

This Plan provides fugitive dust control methods for construction activities and/or sources that emit fugitive dust. These sources and/or activities include unpaved and paved roads, disturbed surface areas, earth-moving activities, and the management of large material stockpiles.

This Plan is based on information in the *Environmental Assessment for Southern California Edison Eldorado-Lugo-Mohave Series Capacitor Project* document DOI-BLM-CA-2010-0010-EA dated April 2020 and the *Eldorado-Lugo-Mohave Series Capacitor Project Final Mitigated Negative Declaration* dated November 2019. In the event revisions are made to the Plan, based on final engineering or receipt of final environmental clearance documents, the revised Plan will be provided to the California Public Utilities Commission (CPUC) and the Bureau of Land Management (BLM).

Project areas in California are under the jurisdiction of the CPUC and BLM and must comply with requirements administered under the authority of the Mojave Desert Air Quality Management District (MDAQMD). Project areas in Nevada are under the jurisdiction of Clark County and BLM and must comply with requirements administered under the authority of Clark County's Department of Environment and Sustainability, Division of Air Quality (DESDAQ). This is further discussed in the following sections.

1.1 Project Description

This Project will increase capacity and power flow between SCE's existing Eldorado, Lugo, and Mohave Substations to safely deliver renewable power to the Los Angeles Basin from the Eldorado and Mohave Substations. SCE's Proposed Project would:

- Construct 2 new 500-kilovolt (kV) mid-line series capacitors (i.e., the proposed Newberry Springs Series Capacitor and Ludlow Series Capacitor) and associated equipment.
- Provide 2 communication paths between the series capacitor sites.
 - Install approximately 2 miles of overhead and 700 feet of underground telecommunications facilities as one path to connect the proposed series capacitors to SCE's existing communication system.
 - Install approximately 2 miles of underground telecommunications facilities as a second communication path to connect the series capacitors to SCE's existing communication system.
- Provide station light and power to the proposed series capacitors by extending and/or rerouting existing lines to create approximately 2 miles of overhead and 700 feet of underground 12 kV distribution circuits. (The new distribution poles would support overhead telecommunication facilities as well as the electric distribution lines.)

- Construct 3 new fiber optic repeater facilities (Barstow, Kelbaker, and Lanfair) within the Lugo-Mohave Right-of-Way (ROW).
- Install distribution lines for light and power at the 3 proposed fiber optic repeater sites.
- Install underground telecommunications facilities from existing transmission structures to the Barstow, Kelbaker, and Lanfair fiber optic repeater sites.
- Address 16 potential overhead clearance discrepancies at 14 locations by:
 - Relocating, replacing, or modifying existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV transmission lines to address 14 of the overhead clearance discrepancies. Tower modifications would include raising 9 towers up to approximately 18.5 feet by inserting new lattice-steel sections in tower bodies.
 - Performing minor grading at 2 locations along the Lugo-Mohave 500 kV transmission line to address 2 of the overhead clearance discrepancies.
- Install approximately 232 miles of optical ground wire (OPGW) (approximately 59 miles on the Eldorado-Mohave transmission line and approximately 173 miles on the Lugo-Mohave transmission line and approximately 3 miles of underground telecommunications facilities in the vicinity of the Mohave Substation).
- Modify and strengthen the ground wire peak of existing suspension towers where OPGW splices would occur. (Some of these towers would also require minor modifications to the steel in the tower body.)
- Install approximately 2,000 feet of underground telecommunications facilities within the existing Lugo, Mohave, and Eldorado substations.
- Within Lugo Substation, perform modifications on the existing series capacitors and install new terminating equipment and remove 2 existing tubular steel poles (TSP) and install 2 new TSPs on the Eldorado-Lugo and Lugo-Mohave 500 kV transmission lines.
- Within the Eldorado Substation, perform modifications on the existing series capacitors and upgrade the terminal equipment on the Eldorado-Lugo 500 kV transmission line.
- Within the Mohave Substation, replace existing series capacitors on the Lugo-Mohave 500 kV transmission line and install new terminal equipment on the Eldorado-Mohave and Lugo-Mohave 500 kV transmission lines.
- Install (if necessary) cathodic protection on approximately 60 miles of SoCalGas's natural gas pipelines parallel to SCE's Lugo-Mohave 500 kV transmission line and on other pipelines as needed.

1.2 Project Location

The Project is located in southern California and southern Nevada, within the Mojave Basin and Range Ecoregion. It will extend northeast from Lugo Substation (located in San Bernardino County, California) to Eldorado Substation (located in the City of Boulder City, Nevada) and Mohave Substation (located in Clark County, Nevada), and from Mohave Substation northwest to Eldorado Substation. The Project is located on land under the jurisdiction of the BLM, the Mojave National Preserve (MNP) administered by the National Park Service (NPS), the Bureau of Reclamation, and the Department of Defense. Portions of the

Project will also cross the City of Hesperia in California, as well as the unincorporated communities of Searchlight and Laughlin in Nevada. The majority of the Project will be constructed within existing SCE easements, fee-owned properties, and public franchise areas. SCE will need a minimum of 1.9 acres of additional ROW from the BLM to construct the proposed Newberry Springs Series Capacitors and a minimum of 1.6 acres of additional private property to construct the proposed Ludlow Series Capacitor.

1.3 Lead, Cooperating, and Consulting Agencies

1.3.1 Lead Agencies

Lead agencies have discretionary approval over the Project and are responsible for reviewing aspects of the measures documented in this Plan. The CPUC is California's lead agency responsible for compliance with the California Environmental Quality Act (CEQA) for Project areas on non-federal lands. The CPUC issued an Initial Study/Mitigated Negative Declaration for the Project under CEQA. The BLM Desert District Office is the federal lead agency responsible for compliance with National Environmental Policy Act for the Project areas on federal lands.

1.3.2 Cooperating Agencies

Because the Project also crosses the MNP, the NPS elected to participate as a cooperating agency for the environmental review of the Project. Although the existing transmission lines associated with the Project also cross lands administered by the Bureau of Reclamation and the Department of Defense, the NPS represents the only federal cooperating agency at this time.

1.3.3 Consulting Agencies

Consulting agencies are public agencies, other than the lead agencies, that may provide guidance or information needed to satisfy the requirements of the measures contained in this Plan. Consulting agencies for select MMs listed in Table 1 include MDAQMD and DESDAQ. Project areas in California will be subject to plans and permits approved by MDAQMD while Project areas in Nevada will be subject to plans and permits approved by DESDAQ.

1.4 Mitigation Measures

The APMs and MMs addressed in this Plan are provided in Table 1. This Plan is listed as a submittal requirement in the Project's 2020 *Environmental Assessment for Southern California Edison Eldorado-Lugo-Mohave Series Capacitor Project* and 2019 *Eldorado-Lugo-Mohave Series Capacitor Project Final Initial Study/Mitigated Negative Declaration*.

Table 1 Mitigation Measures	
Measure	Text of Measure
MM AQ- 1 (CPUC)	<p>Prepare and Implement a Dust Control Plan</p> <p>SCE shall minimize visible fugitive dust emissions by implementing the following dust control measures derived from MDAQMD Rule 403.2. Prior to commencing earth-moving activity, SCE shall prepare and submit to the MDAQMD, Clark County DAQ, CPUC, BLM and NPS a Dust Control Plan that describes all dust control measures that will be implemented for the project, including, but not limited to:</p>

Table 1 Mitigation Measures	
Measure	Text of Measure
	<ul style="list-style-type: none"> • Use periodic watering for short-term stabilization of disturbed surface area to minimize visible fugitive dust emissions. If used, non-water-based or chemical soil stabilizers and dust suppressants shall be non-toxic and must not cause loss of vegetation, adverse odors, or additional emissions of ozone precursor reactive organic gases (ROG) or volatile organic compounds (VOC). • Provide stabilized access route(s) to the project site as soon as is feasible and enforce a maximum 15 mile per hour vehicle speed limit on any unpaved surface. • Stabilize graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than thirty days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions. • Maintain natural topography to the extent possible. • Construct parking lots and paved areas first, where feasible. • Take actions sufficient to prevent project-related trackout or spills onto publicly maintained paved surfaces, and cleanup project-related trackout or spills on publicly maintained paved surfaces within 24 hours. • Cover loaded haul vehicles or provide adequate freeboard while operating on publicly maintained paved surfaces. <p>Reduce non-essential earth-moving activity under high wind conditions, gusts exceeding 25 miles per hour.</p>
MM AQ-1 (BLM)	A Dust Control Plan shall be prepared and implemented. Notwithstanding whether a violation of any air quality permit, law or regulation results, SCE will cooperate with the Authorized Officer in implementing and maintaining reasonable and appropriate dust control methods in conformance with law and appropriate to the circumstances at the sole cost of the SCE. See LUPA-AIR-1/2/4/5.
MM AQ-2 (BLM)	During excavation, backfilling, and contouring, the disturbed soil shall be wetted sufficiently in order to effectively reduce airborne dust and reduce soil erosion. See LUPA-AIR-1/2/4/5.
MM AQ-4 (BLM)	SCE shall not violate applicable air standards or related facility siting standards established by or pursuant to applicable federal, state, or local laws or regulations. SCE shall be responsible for dust abatement within the limits of the right-of-way and is responsible for obtaining all necessary permits from appropriate authorities for acceptable dust abatement and control methods (e.g., water, chemicals). SCE shall be solely responsible for all violations of any air quality permit, law or regulation, as a result of its action, inaction, use or occupancy of the right-of-way. See LUPA-AIR-1/2/4/5.
MM AQ-5 (BLM)	Prior to relinquishment, abandonment, or termination of this right-of-way, SCE shall apply reasonable and appropriate dust abatement and control measures to all disturbed areas. The abatement and measures shall be designed to be effective over the long-term (e.g., rock mulch or other means) and acceptable to the Authorized Officer. See LUPA-AIR-1/2/4/5.
MM AQ-6 (BLM)	<p>During construction, fugitive dust would be controlled by implementing the following measures:</p> <ul style="list-style-type: none"> • Surfaces disturbed by construction activities would be covered or treated with water until the completion of activities at each site of disturbance. • Inactive disturbed (e.g., excavated or graded areas) soil and soil piles would be sufficiently watered or sprayed with a soil stabilizer to create a surface crust or would be covered.

Table 1 Mitigation Measures	
Measure	Text of Measure
	<ul style="list-style-type: none"> Drop heights from excavators and loaders would be minimized to a distance of no more than 5 feet. Vehicles hauling soil and other loose material would be covered with tarps or maintain at least 6 inches of freeboard. Within California and Nevada, vehicle speeds on unpaved roads, unpaved traffic areas, and parking areas would be restricted to 15 miles per hour. Vehicle speeds on state and county roadways would adhere to all posted speed limits. <p>Within Nevada, unpaved non-public traffic and parking areas designated for utilization during Proposed Project construction would be effectively stabilized to control dust emissions (e.g., using water). In California, unpaved non-public traffic and parking areas designated for utilization during Proposed Project construction would be effectively stabilized to control dust emissions with water.</p>
LUPA-BIO-6 (BLM)	The application of water and/or other palliatives for dust abatement in construction areas and during project operations and maintenance will be done with the minimum amount of water necessary to meet safety and air quality standards and in a manner that prevents the formation of puddles, which could attract wildlife and wildlife predators.
APM-AIR-01	<p>Fugitive Dust. During construction, fugitive dust would be controlled by implementing the following measures:</p> <ul style="list-style-type: none"> Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance. Inactive disturbed (e.g., excavated or graded areas) soil and soil piles would be sufficiently watered or sprayed with a soil stabilizer to create a surface crust, or would be covered. Drop heights from excavators and loaders would be minimized to a distance of no more than 5 feet. Vehicles hauling soil and other loose material would be covered with tarps or maintain at least 6 inches of freeboard. Within Nevada, vehicle speeds on unpaved traffic and parking areas would be restricted to 15 miles per hour. In California, vehicle speeds on unpaved roadways would adhere to all posted speed limits. <p>Within Nevada, unpaved non-public traffic and parking areas designated for utilization during Proposed Project construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant). In California, unpaved non-public traffic and parking areas designated for utilization during Proposed Project construction would be effectively stabilized to control dust emissions with a chemical stabilizer/suppressant.</p>
<p>NOTE: ^aAPM refers to Applicant Proposed Measure proposed by SCE. MM refers to Mitigation Measure. SOURCE: Environmental Assessment for Southern California Edison Eldorado-Lugo-Mohave Series Capacitor Project document DOI-BLM-CA-2010-0010-EA dated April 2020, and Eldorado-Lugo-Mohave Series Capacitor Project Final Initial Mitigated Negative Declaration dated November 2019.</p>	

1.5 Applicable Activities and Project Areas

The activities addressed in this Plan are as follows:

- Construction work, including ground-disturbing activities, and paved and unpaved road travel

This Plan is applicable to all Project areas within California and Nevada (Figure 1), including Federally administered lands. A separate dust control plan/permit from MDAQMD for Project activities within

California also exists. The dust control plan/permit from the MDAQMD will apply to all Project areas within California, including activities conducted on BLM land. Similarly, a separate dust mitigation plan/permit from DESDAQ for Project activities within Nevada, including activities conducted on BLM land also exists. As a result, the requirements within this Plan and the MDAQMD and DESDAQ plans/permits overlap. Individual APMs and MMs are applicable to specific segments as listed in Table 2. Additional measures may be required unique to MDAQMD and DESDAQ and specific air district approved dust control plans and permits should also be complied with by the Project team.

Table 2 Applicable Project Area	
Measure	Applicable Project Components
MM AQ-1 (CPUC)	All Project areas in California
MM AQ-1 (BLM)	Federally administered lands
MM AQ-2 (BLM)	Federally administered lands
MM AQ-3 (BLM)	Federally administered lands
MM AQ-5 (BLM)	Federally administered lands
MM AQ-6 (BLM)	Federally administered lands
LUPA-BIO-6 (BLM)	Federally administered lands
APM-AIR-01	All Project areas

1.6 Timing

The measures described in this Plan are applicable for the following periods of the Project, as shown in Table 3.

Table 3 Timing of Applicant Proposed and Mitigation Measure and Applicability			
Measure	Period		
	Preconstruction (Mobilization)	During Construction (Active)	Post-construction (Restoration)¹
MM AQ-1 (CPUC)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MM AQ-1 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MM AQ-2 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
MM AQ-4 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
MM AQ-5 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
MM AQ-6 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
LUPA-BIO-6 (BLM)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
APM-AIR-01	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
NOTE: ¹ Operations and Maintenance will be conducted in accordance with all applicable rules and regulations.			

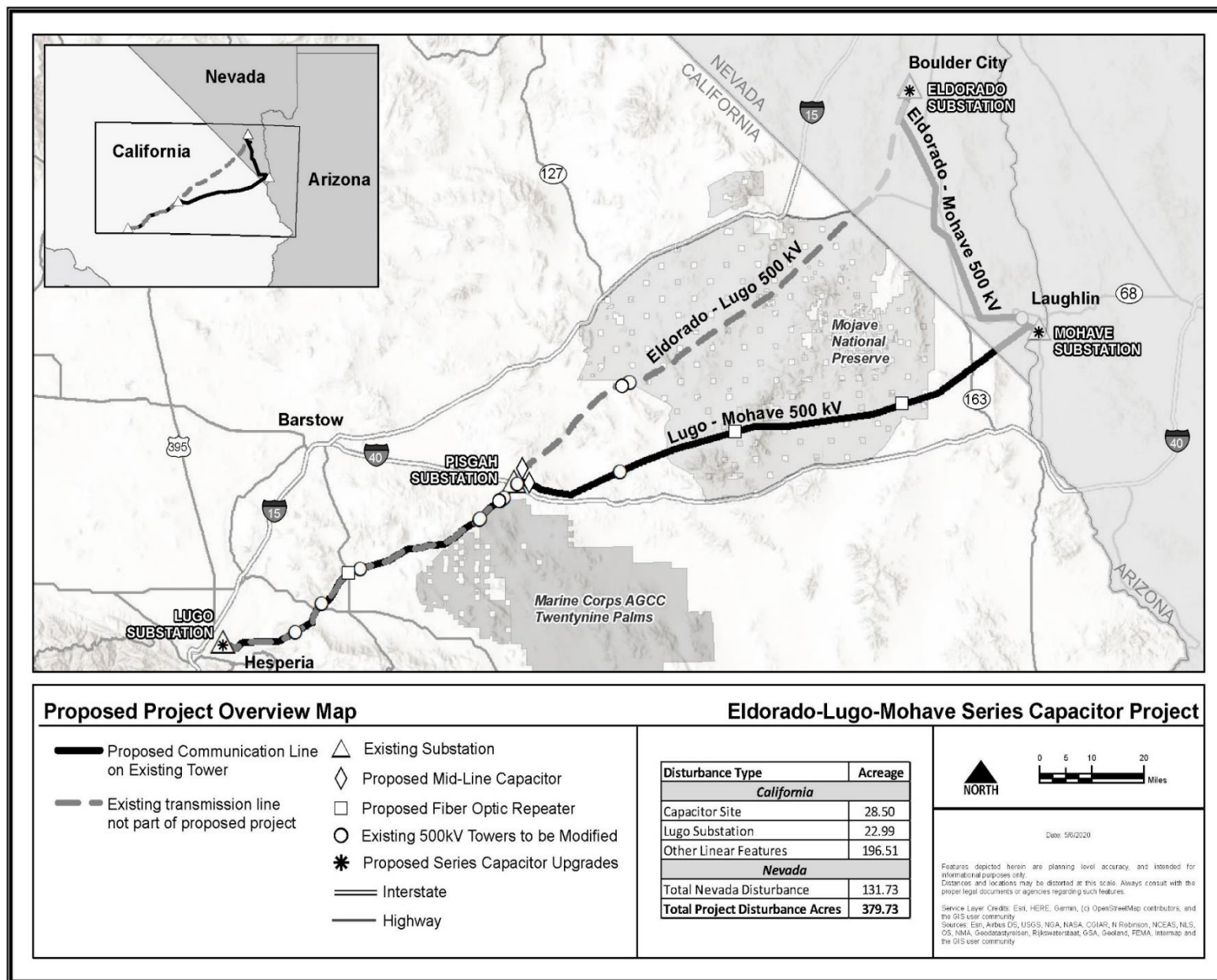


Figure 1 Proposed Project Overview

2 Methods

This section includes a detailed description of the actions required to implement the applicable APMs and/or MMs for the Project work packages covered by this Plan. The Project area of this plan spans the MDAQMD and the DESDAQ. The location of the California Air Quality Management districts is shown in Figure 2, while Figure 3 shows the MDAQMD boundary. The DESDAQ boundary coincides with that of Clark County, Nevada. CPUC MM AQ-1, BLM MM AQ-1, BLM MM AQ-2, BLM MM AQ-4, BLM MM AQ-5, BLM MM AQ-6, LUPA-BIO-6 and APM-AIR-01 contain requirements that apply to construction activities in associated Air Districts. As such, the construction team also shall comply with applicable local Air District regulations. Table 4 summarizes the applicable air district for each Project work package.

Table 4 Project Element and Applicable Air District		
[Work Package/Segment]	Applicable Air District	
	MDAQMD	DESDAQ
<i>All California Project areas</i>	<i>Applicable</i>	<i>Not Applicable</i>
<i>All Nevada Project areas</i>	<i>Not Applicable</i>	<i>Applicable</i>
NOTE: Work Package/Segment includes all Federally administered lands		

A standard practice for dust control includes the use of dust palliatives. Dust palliatives are commonly referred to by several names. For this plan, the following terms are used interchangeably:

- Soil Stabilizer
- Soil Binder

Dust Palliatives to be used on the project (except within the MNP) consist of the following types:

- Water
- Chemical Stabilizers, which include:
 - Synthetic polymers- (e.g. FSB1000)
 - Organic petroleum products: modified & unmodified Asphalt emulsions
 - Deliquescent/ Hygroscopic salts
 - Lignin-Based Types (Lignosulfonate)
- Fibers/Mulches
- Organic non- petroleum products

Dust palliatives proposed for use during this project are included in Appendix A. These dust palliatives are approved for use by the DESDAQ in Nevada and are pending MDAQMD approval. Dust palliatives will not be used on BLM or private land in California, until the MDAQMD issues approval for such use. Only water will be used as a dust palliative within the boundaries of the MNP.

2.1 Fugitive Dust Control Measures for Project Implementation

This section contains fugitive dust control measures applicable to all Project areas, including federally administered lands and non-federal lands in California and Nevada, throughout the various stages of construction.

The following methods are required to achieve compliance with all CPUC and BLM dust control MMs and/or APMs. In implementing these measures, the Project will comply with all rules and regulations applicable to SCE's standard policies and local Air District requirements. The MDAQMD and DESDAQ specific dust control regulations are summarized in Section 2.2 and the agency specific permits are included in Appendix B and C.



Figure 2 California Air Quality Management Districts

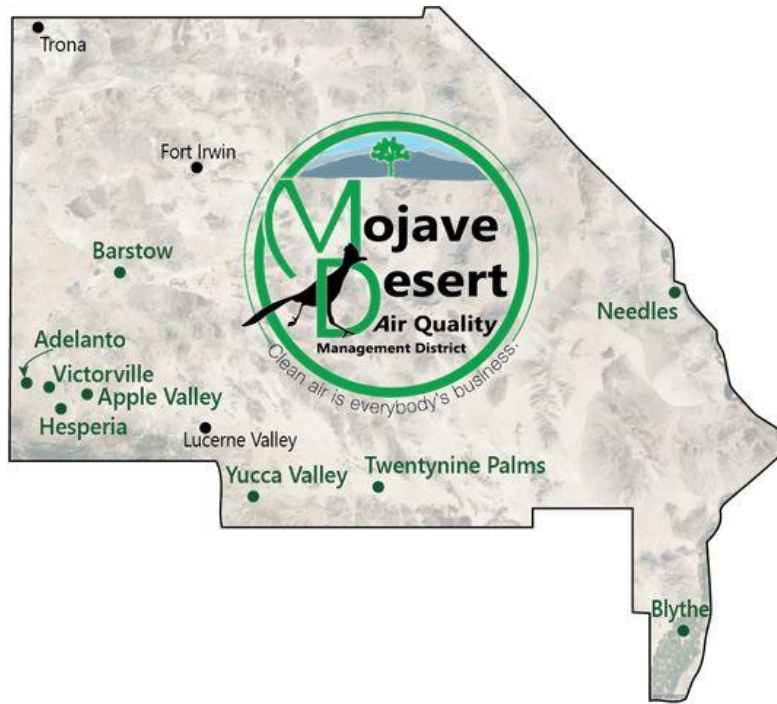


Figure 3 Mojave Desert Air Quality Management District

2.1.1 Travel on Unpaved Roads

The following fugitive dust control measures may be implemented for travel on unpaved roads and unpaved parking lots during construction:

- Travel on unpaved roads will be limited to the extent possible, and traffic will be directed over established haul routes.
- Unpaved road (access and spur) vehicle travel will not exceed the maximum posted speed limit. On roads without a posted speed limit, vehicles will be limited to 15 miles per hour.
- Gravel will be placed on access road approaches, and track-out control devices such as rumble plates may be installed at the intersection of unpaved access roads and public paved roads.

2.1.2 Travel on Paved Roads

Prior to construction equipment travel on paved roads, the following may be implemented:

- Fugitive dust will be minimized while transporting soil and other materials on paved roads by covering vehicles hauling soil and other loose material with tarps, in addition to maintaining freeboard in compliance with local Air District regulations. Clark County requires 3 – 6 inches of freeboard per the DESDAQ Construction Activity Handbook included by reference in CCAQR 94; while California requires a minimum of 6 inches of freeboard per California Vehicle Code 23114(e)(4)). Reference air district specific permits and plans for additional information and requirements.

- Vehicle tires will be inspected prior to entering paved roadways from unpaved areas to verify they are free of dirt. To clean tires, the following may be implemented:
 - Gravel will be placed on access road approaches and track-out control devices such as shaker plates may be installed at the intersection of unpaved access roads and paved roads.
 - The construction team shall conduct a visual inspection of the vehicle wheels and the wheels of the equipment loaded upon each vehicle, to assess the presence of dirt. If caked dirt or mud is present, such shall be removed from wheels prior to entering paved intersections, to the extent feasible.
 - Track-out onto paved roads will be removed at the conclusion of the workday or evening shift with water sweepers (or as required by local District regulations) if visible soil material from the construction sites or unpaved access roads is carried onto adjacent public streets.

2.1.3 Active Disturbed Surface Areas

The following will be implemented, for areas disturbed by construction activities, to limit visible dust emissions from exiting the Project boundaries, in compliance with regulatory requirements:

- Dust control during construction will be achieved primarily through the application of water. Dust palliatives are not intended. However, should they become necessary or preferred, dust palliatives will be non-toxic, and will not cause vegetation loss, adverse odors, or additional emissions of ozone precursor reactive organic gasses or volatile organic compounds. Dust palliatives proposed for use during this project are included in Appendix A. These dust palliatives are approved for use by the DESDAQ and are pending MDAQMD approval. The dust palliatives will not be used on BLM or private land in California until MDAQMD issues approval for use. Only water will be used as a dust palliative within the boundaries of the MNP.
- All active construction areas, unpaved access roads, parking areas, and staging areas will be watered to control fugitive dust. Sites may be pre-watered up to 48 hours in advance of clearing; water will be applied prior to, during, or after earthmoving operations; and water will be applied as needed should visible emissions occur. The water trucks will be available during all work hours, and outside work hours if fugitive dust becomes an air quality compliance issue outside of work hours.
- The majority of water application is intended in the construction areas of the new capacitor sites and their access roads. Fugitive dust emissions from existing unpaved roads and unpaved ROW easements will be controlled by limiting traffic speed; however, water application controls may be used if needed.
- The use of water and/or dust palliatives for dust control will be minimized to the extent needed to comply with safety and air quality standards, in a manner that prevents the pooling of water that may attract wildlife and nearby predators.
- Reduce non-essential earth-moving activity when wind gusts exceed 25 miles per hour.

2.1.4 Inactive Disturbed Surface Areas

Inactive disturbed areas are not intended during the project. Project areas will be active areas, or areas in which active work has been completed and not left inactive. Should inactive disturbed surface areas be generated during the project, the following dust mitigation would apply.

Inactive disturbed areas (project approved grading site surfaces) will be sufficiently watered or will be covered. Areas will be stabilized upon completion of grading when subsequent development is delayed or expected to be delayed more than 14 days (7 days in CA), except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions. Stabilization will include:

- Restricting vehicular access
- Applying and maintaining water on unvegetated areas
- The use of water or dust palliatives for dust control will be minimized to the extent needed to comply with air quality standards in order to minimize or prevent pooling of water that may attract wildlife and nearby predators.

2.1.5 Open Storage Piles

Imported fill will be placed at the same time that it arrives to the site when feasible. However, when material is stockpiled during construction, stockpiles will be watered to control fugitive dust and covered if inactive.

2.1.6 Construction Transportation Plan

No specific mitigation is applicable.

2.1.7 Road Travel Plan

For construction of this project, SCE and its contractors will utilize a combination of through roads and spur roads accessed from existing paved and unpaved public and private roads located on public, private, and government lands. Access to the transmission line ROW for construction activities and future operation and maintenance activities associated with the project will also utilize these roads.

For construction sites with unpaved access greater than 1 mile, the following actions will be taken:

- Travel of heavy equipment in and out of the unpaved areas will be limited by moving from construction site to construction site rather than back to marshalling or staging areas, to the extent feasible.
- Construction workers may carpool and/or be bused to construction sites, as practicable, and in accordance with project approved Covid 19 policies.

2.1.8 Earth Moving Activities.

Some new temporary access roads, and some permanent access roads to the new capacitor sites will be constructed. Permanent disturbance will occur at the capacitor sites. Construction of the two new

capacitor sites will require earthwork totaling about 8.4 acres. The following will be implemented for earth-moving activities.

- Earthwork activities such as clearing, grading, cutting, and back fill will be limited to designated areas, mostly at the new capacitor locations, and minimally where unpaved access roads will be constructed.
- Earthwork will be minimized to the extent feasible while meeting project needs.
- Earthwork being performed in temporary work areas will be minimized to maintain natural topography to the extent possible to assist in final restoration efforts.
- Areas that will be cleared that have low soil moisture content will be pre-watered up to 48 hours in advance.
- Water will be applied prior to, during, or after earthmoving operations as needed should visible emissions occur.

2.2 Air District Specific Dust Control Rules

This Plan is applicable to all components of the Project, including Federally administered lands. The fugitive dust control rules promulgated by the air districts traversed by the Project, MDAQMD and DESDAQ, contain fugitive dust control requirements that will be implemented by the construction team.

2.2.1 Mohave Desert Air Quality Management District

Construction in all Project areas within California fall under the jurisdiction of MDAQMD. The construction team must comply with MDAQMD Rules 403 and 403.2. Project activities performed within the MDAQMD and applicable air district requirements are summarized in this section. The MDAQMD Dust Control Permit requirements for the project areas in California are provided in Attachment B.

The construction team will implement the following MDAQMD rules to ensure project compliance with MDAQMD Rule 403.2:

- Use periodic watering for short-term stabilization of disturbed surface areas to minimize visible fugitive dust emissions.
- Provide stabilized access route(s) to the project site as soon as is feasible and enforce a maximum 15 mile per hour vehicle speed limit on any unpaved surface.
- Stabilize graded site surfaces upon completion of grading when subsequent development is delayed or expected to be delayed more than thirty days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions.
- Maintain natural topography to the extent possible.
- Construct parking lots and paved areas first, where feasible.
- Take sufficient actions to prevent project-related trackout or spills onto publicly maintained paved surfaces, and cleanup project-related trackout or spills on publicly maintained paved surfaces within 24 hours.

- Cover loaded haul vehicles or provide adequate freeboard while operating on publicly maintained paved surfaces.
- Reduce non-essential earth-moving activity under high wind conditions, gusts exceeding 25 miles per hour.
- Only remove the minimum amount of vegetation necessary for the construction of structures and facilities during construction.
- SCE will install and maintain signage with project contact information that meets the minimum standards of the Rule 403.1 Implementation Handbook, prior to initiating any type of earth-moving activities.

2.2.2 Clark County Department of Air Quality

Construction in all Project areas located within Nevada fall under the jurisdiction of DESDAQ. The construction team will comply with the following Clark County Air Quality Regulations (CCAQR):

- Section 41 - Prohibits the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne.
- Section 90 – Prohibits fugitive dust from Open Areas and Vacant Lots
- Section 91 – Prohibits fugitive dust from Unpaved Roads, Unpaved Alleys, and Unpaved Easement Roads
- Section 92 – Prohibits fugitive dust from Unpaved Parking Lots and Storage Areas
- Section 93 – Prohibits fugitive dust from Paved Roads and Street Sweeping Equipment
- Section 94 – Requires permitting and Dust Control for Construction Activities

Project activities performed within Clark County and applicable air district requirements are summarized in this section. These control measures are defined within the DAQ's Dust Control Handbook. DAQ staff may inspect the project location at any time without prior notice to determine if compliance with the terms and conditions of the Dust Control Handbook are being met. The DESDAQ Dust Mitigation Control Permit requirements for the project areas in Nevada are provided in Attachment C and are summarized as follows:

- Stabilize all project construction areas before, during, and after construction activities, including backfilling of material, trenching, clearing and grubbing, crushing material, grading
- Stabilize all project surface soils where support equipment and vehicles will operate, including haul routes, parking areas, equipment staging areas
- Limit visible emissions to no more than an average of 20% opacity for any period aggregating 3 minutes in any 60-minute period pursuant to Air Quality Regulations
- Limit vehicle traffic and disturbance of soils where possible to limit visible dust opacity from vehicular operations
- Pre-water construction areas prior to construction activities that disturb soils
- Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage
- Maintain 3-6 inches of freeboard to minimize spillage
- Clean wheels and undercarriage of haul trucks prior to leaving construction site

- Empty loader bucket slowly and keep loader bucket close to the truck to minimize the drop height while dumping
- Use of soil to create a ramp for vehicle access over a curb is prohibited
- Cease construction activities immediately when winds occur that cause fugitive dust emissions, despite adhering to all BMPs. Water trucks/pulls should continue to operate under these circumstances unless wind conditions are such that continued operation of watering equipment cannot reduce fugitive dust emissions or visibility is limited to an extent that it is hazardous to continue operating equipment.
- Construction site superintendent(s), foreperson, or other designated onsite representative(s), as well as water truck driver(s) will attend and successfully complete the CCDAQ Dust Control Class.

2.3 Monitoring and Record Keeping Requirements

SCE will comply with all monitoring requirements and maintain all records specified in the DCP. SCE will also comply with the requirements of the MDAQMD and DESDAQ as set forth in the Project specific permits approved by the jurisdictional air districts.

- The contractor will compile written daily records to document the specific actions taken to comply with this Plan and with MDAQMD Rule 403 and 403.2.
- The contractor will compile written daily records to document the specific actions taken to comply with this Plan and with CCDAQ Section 41 and 94 Rules.
- Soil conditions, including preventive and corrective measures, must be recorded every day the construction project is active.
- Record use of suppressants and dust palliatives and retain records.
- Trackout conditions, including preventive and corrective measures, must be recorded daily for every day that the construction project access is used by vehicles.
- The contractor will monitor daily wind speeds to determine when sustained wind speeds are anticipated to exceed 25 mph. The contractor will record the dates and the actions taken to minimize fugitive dust emissions during high-wind events.

These records will be completed by the on-site environmental monitor and uploaded to FRED, SCE's record distribution database.

3 Plan Approval

This Plan has been prepared to address the requirements of MM AQ-1 from the CPUC; MM AQ-1, MM AQ-2, MM AQ-4, MM AQ-5, and MM AQ-6 from the BLM; and APM-AIR-01. SCE requests review and approval of this Plan by the CPUC for non-federal lands in California. SCE requests review and approval of this Plan by the BLM for federal lands project wide. MDAQMD and DESDAQ are not requested for review of this Plan, and instead will review and approve the required air district specific plans and permits. In the event changes are made to this Plan, a revised plan will be provided to CPUC and BLM.

4 References

- Bureau of Land Management (BLM) and National Park Service (NPS). 2020. United States Department of the Interior, Bureau of Land Management California Desert District and National Park Service Mojave Nation Preserve, Environmental Assessment for Southern California Edison Eldorado-Lugo-Mohave Series Capacitor Project. DOI-BLM-CA-2020-0010-EA. April 2020.
- Clark County Air Quality Regulations (CCAQR). 2020. https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/rules___regulations/current_aq_rules.php. Accessed on August 24, 2020.
- Mojave Desert Air Quality Management District (MDAQMD). Rule 403, Fugitive Dust and Rule 403.2, Fugitive Dust for the Mojave Desert Planning Area. 2004. <https://www.mdaqmd.ca.gov/rules/rule-book/regulation-iv-prohibitions>. Accessed on August 22, 2019.
- Redhorse Corporation. 2020. MDAQMD Dust Control Plan Application and Supplemental Narrative for SCE's Eldorado-Lugo-Mohave Upgrade Project. June 24, 2020. Approved July 28, 2020.
- State of California Public Utilities Commission (CPUC). 2019. Final Mitigated Negative Declaration, Southern California Edison's Eldorado-Lugo-Mohave Series Capacitor Project Application No. A.1805007. November 2019.

Attachment A. Approved Dust Palliatives

A1 Approved Dust Palliatives

Dust Palliatives which have been approved for project use by the Clark County Department of Environment and Sustainability, Division of Air Quality include the following:

Synthetic Polymers:	FSB-1000
	Global EarthBind 100
	Soil Sement
	Gorilla Snot/SoilTac
Deliquescent/Hygroscopic salts	Chlor-Tex
	Chlor-Tex MagChlor

For non-traffic areas, water will be used as the primary dust control measure. Water will be applied as required by the air district permit. Additional water will be utilized as needed. Should water not control the dust from the project, a soil binder will be applied to those areas that require additional dust control measures in accordance with the manufacturer's specifications. The preferred soil binder to be used and applied to non-traffic areas would be synthetic polymers. The following is the preferred manufactured product within this product type:

- Soil Binder Brand: FSB 1000
- Application Rate: 150 gal/acre
- Frequency: One time
- Final Stabilization: Shall be determined by the SWPPP

Other possible soil binder product types for non-traffic areas may include organic nonpetroleum-based products or may be standard fibers/mulches.

For traffic areas, water will be the primary method of dust control. Water will be applied as required by the air district permit. Additional water will be utilized as needed. It is not likely that a soil binder will be used to control dust on traffic areas. However, should the need arise, a soil binder will be applied to those areas per the manufacturer's specifications. The preferred soil binder to be used and applied to traffic areas would also be synthetic polymers for continuity in product applications. The following is the preferred manufactured product at applications of this product type on traffic areas:

- Soil Binder Product: FSB 1000
- Application Rate: 175 gal/acre and per inch of stabilized road surface, plus 100 gal/acre topical. (i.e., one acre of stabilized road at 4" is 800 gal)
- Frequency: One time
- Final Stabilization: Shall be determined by the SWPPP

Other possible soil binder product types to use on traffic areas may include organic nonpetroleum-based products or magnesium chlorides.

**Attachment B. Mojave Desert Air Quality
Management District Approved
Dust Control Plan/Permit**

Dane Anderson

From: Amanda McDaniel <amanda.mcdaniel@redhorsecorp.com>
Sent: Tuesday, July 28, 2020 9:53 AM
To: Alan De Salvio
Cc: Sarah Strout; Sheri Haggard; Dane Anderson; Scott Peters
Subject: RE: Dust Control Plan submittal for Southern California Edison

From External Sender

Alan,

Thank you for your approval and rapid response. I can honestly say that is the fastest I've ever had any submittal reviewed, responded to, and approved. I will provide this approval notice to SCE.

Regards,

Amanda McDaniel, CEM
Environmental Engineer/Air Quality Specialist
Redhorse Corporation
5250 Neil Rd, Suite 208
Reno, NV 89502
W: (775) 323-4677
C: (775) 544-8952
amanda.mcdaniel@redhorsecorp.com
www.redhorsecorp.com



Upcoming Time Off/Out Of Office: None planned

Currently working out of office in response to Covid-19

From: Alan De Salvio <Adesalvio@mdaqmd.ca.gov>
Sent: Tuesday, July 28, 2020 9:46 AM
To: Amanda McDaniel <amanda.mcdaniel@redhorsecorp.com>
Cc: Sarah Strout <sstrout@mdaqmd.ca.gov>; Sheri Haggard <shaggard@mdaqmd.ca.gov>
Subject: RE: Dust Control Plan submittal for Southern California Edison

This DCP has been reviewed and is approved. MDAQMD staff will visit the site at some point in the future – the project may commence.



Alan J. De Salvio

Deputy Director - Operations

760.245.1661, ext. 6726 Office

760.403.4724 Mobile

760.245.2022 Fax

MDAQMD.ca.gov

@MDAQMD on [Facebook](#), [Twitter](#) and [Instagram](#)

From: Amanda McDaniel <amanda.mcdaniel@redhorsecorp.com>

Sent: Monday, July 27, 2020 4:51 PM

To: Engineering Email <Engineering@mdaqmd.ca.gov>

Cc: Dane Anderson <dane.anderson@betaengineering.com>; Scott Peters <speters@epgllc.co>

Subject: Dust Control Plan submittal for Southern California Edison

MDAQMD,

I am submitting the attached Dust Control Plan on behalf of Southern California Edison. The plan includes the MDAQMD Dust Control Plan Form, available on the MDAQMD website, and additional narrative and figures. If you have any questions or require further information, please contact me or the SCE Project Execution representative using the contact information supplied in the attached plan.

Regards,

Amanda McDaniel, CEM
Environmental Engineer/Air Quality Specialist
Redhorse Corporation
5250 Neil Rd, Suite 208
Reno, NV 89502
W: (775) 323-4677
C: (775) 544-8952
amanda.mcdaniel@redhorsecorp.com
www.redhorsecorp.com



Upcoming Time Off/Out Of Office: None planned

Currently working out of office in response to Covid-19

**Attachment C. Clark County Department of
Environment and Sustainability, Division of Air
Quality Approved Dust Control Plan/Permit**



Division of Air Quality
4701 W. Russell Rd. Suite 200 2nd Floor
Las Vegas, NV 89118
Main Number: (702)455-5942
Fax Number: (702)383-9994

Dust Control Operating Permit (DCOP) For Construction Activities

This permit does not exempt the permittee from compliance with the Endangered Species Act

Permit No: 52923

Version No: 0

Permittee: Southern California Edison

Project: Elm Series Capacitor Project (52923)

Physical Location: Start at Bruce Woodbury Dr/Needles Hwy, Laughlin

Cross Streets: Nevada State Line/Needles Hwy, N

Effective Date: Oct 1, 2020

Expiration Date: Sep 30, 2021

Revision Date: N/A

Revision Type: N/A

Project Acreage: 34.75

Region: ESE - East/Southeast

Notes/Additional Permit Conditions

Designated Onsite Representative

Name: Dane Anderson
Company: Beta Engineering California LP
Mobile Number: 847-494-6609

Responsible Official

Name: Joy Brooks
Company: Southern California Edison
Office Number: 626-302-8850
Mobile Number: 626-609-9027

Dust control measures must occur 24 hours a day, 7 days a week.

This permit is not valid until all fees are paid in full and a complete copy of the permit with conditions and the dust mitigation plan is posted on the project site.

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.

Dust Control Operating Permit (DCOP) Application Clark County Department of Air Quality				For DAQ Use Only			
NOTE: Demolition by implosion is not covered by this application -- use Implosion Operating Permit Application.				Invoice Number: Received by email on 9-9-2020 at 3:25 PM From: Dane Anderson			
Application Type (Select One):		Applicant Type (Select One):					
<input checked="" type="radio"/> New <input type="radio"/> Renewal <input type="radio"/> Modification		<input type="radio"/> Property Owner <input type="radio"/> Developer <input checked="" type="radio"/> Easement Holder <input type="radio"/> Contractor <input type="radio"/> Government					
1. Responsible Official (Applicant) Information:							
Responsible Official Name:		Responsible Official Title:		Permittee (Owner/Company/Organization Name):			
JOY BROOKS		SENIOR MANAGER, AIR QUALITY		SOUTHERN CALIFORNIA EDISON EDISON			
Permittee Mailing and Email Address Information							
Number:	Direction:	Street:		Street Type:	Suite:	PO Box:	
						5085	
City:	ROSEMEAD			State:	CA	Zip:	91770
Email:	JOY.S.BROOKS@SCE.COM CC			Primary Communication Method: <input checked="" type="radio"/> Email <input type="radio"/> US Postal			
Phone Numbers							
Office:	626-302-8850	Extension:		Cell:	626-609-9027	Fax:	
2. Construction Site Superintendent or other designated On-site Representative:							
Name:		Title:		Company:			
DANE ANDERSON		PROJECT ENGINEER		BETA ENGINEERING CALIFORNIA LP			
Email:	DANE.ANDERSON@BETAENGINEERING.COM CC			Dust Card #:	70567	Card Expires:	08/24/2023
Office:	858-750-2370	Extension:		Cell:	847-494-6609	Fax:	
3. Project Information:							
Permit # (For new permit, enter NEW; otherwise, enter existing DCOP #):				NEW		Project Attributes (check all that apply):	
Project Name (same as signage):		ELM SERIES CAPACITOR PROJECT		<input type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Government Facility <input checked="" type="checkbox"/> Infrastructure Utilities <input type="checkbox"/> Flood Control <input type="checkbox"/> Airport <input type="checkbox"/> Soil Remediation <input checked="" type="checkbox"/> Structure Demolition <input type="checkbox"/> Roadway <input type="checkbox"/> Blasting			
Project Description:							
SCE IS PROPOSING NEW MID-LINE SERIES CAPACITORS AND OTHER IMPROVEMENTS TO INCREASE POWER FLOW ALONG THREE EXISTING 500KV TRANSMISSION LINES TO SAFELY DELIVER RENEWABLE POWER TO THE LOS ANGELES BASIN FROM THE ELDORADO AND MOHAVE SUBSTATION. THE PROJECT WILL INCLUDE DEMOLITION OF STRUCTURES AT MOHAVE SUBSTATION. THE DUST MITIGATION PLAN SUPPLEMENT PROVIDES ADDITIONAL INFORMATION.							
Modification Acreage Added:		0		Modification Acreage Removed:		0	
Project Modification Description:							
NOT APPLICABLE (N/A)							
Portable crushing and/or powered screening equipment supporting an on-site single construction activity and remaining onsite for less than 12 months is exempt from the stationary source permitting requirements of AQR Section 12.1 and will instead be subject to the conditions of the Dust Control Operating Permit issued pursuant to AQR Section 94. This exemption does not apply to equipment listed as emission units in a current minor source permit unless the permit states otherwise.				Projects less than two weeks in duration may qualify for a sign waiver.			
Will portable crushing or powered screening occur onsite? <input type="radio"/> Yes <input checked="" type="radio"/> No If yes, what is the anticipated date that equipment will be brought onsite? <input type="text"/>				Does the project qualify for a sign waiver request? <input type="radio"/> Yes <input checked="" type="radio"/> No			
What is the duration equipment will remain onsite? <input type="text"/>				Is a sign waiver requested for this project? <input type="radio"/> Yes <input checked="" type="radio"/> No			

Project Physical Location							
Number:	Direction:	Street:			Street Type:	Suite:	
		START AT BRUCE WOODBURY DR/NEEDLES HWY, LAUGHLIN					
City:	LAUGHLIN			State:	NV	Zip:	89029
<i>List major cross streets and the proximity to the intersection:</i>							
1st Cross Street:			2nd Cross Street:			Proximity:	
NEVADA STATE LIN			I NEEDLES HWY			N	
4. Project Disturbed Surface Area:							
a. Project Disturbed Surface Area Information:							
Nonlinear Area Disturbed (Acreage in Tenths)							
(e.g., project site, stockpiles, staging areas, etc.)							
New/Current Total Nonlinear Project Acreage:		20.2		Total Proposed Nonlinear Project Acreage (new/renewal/modifications):		20.2	
Linear Area Disturbed (Not Within Nonlinear Area)							
(e.g., new unpaved access roads, off-site that may include trenching for utilities, street development, road work, etc.)							
Enter total number of linear segments:						1	
New/Current DCOP Maximum Linear Dimensions: (enter dimensions for new/current DCOP)				Proposed DCOP Maximum Linear Dimensions: (enter dimensions for DCOP modification/renewal DCOP)			
Linear Length:	Length Unit of Measure:	Linear Width (feet):	Linear Length:	Length Unit of Measure:	Linear Width (feet):		
15,840	Feet	40	15,840	Feet	40		
New/Current Total Linear Project Acreage:		14.5		Proposed Total Linear Project Acreage:		14.5	
(1) Nonlinear Area Acreage Subtotal:	20.2	(2) Linear Area Acreage Subtotal:	14.5	Total Project Area Disturbed (1) + (2):	34.7	Modification Acreage Increase:	0
b. Project Parcel. List a parcel number for the project. Particulate Emission Potential (PEP) will automatically be determined by the parcel number. If your project spans multiple parcel numbers, DAQ reserves the right to request the parcel number be changed to account for a higher soil PEP.				Parcel Number		Project PEP	
				26600001006		LOW/MODERATE LOW	
If the project acreage is ten acres or more or if project trenching activities are one mile in length or more, a detailed supplement to the Dust Mitigation Plan must be submitted with this application in accordance with Section 94.5.5 of the Clark County Air Quality Regulations (AQRs) and Appendix B of the Construction Activities Dust Control Handbook.							
Project Map Must Be Attached to DCOP Application NOTE: Air Quality does not accept engineering drawings.							
5. Responsible Official (Applicant) Certification Statement. By signing this permit application, the signatory certifies the following:							
a. As the Responsible Official (applicant), I am authorized on behalf of the Owner Builder/Company/Organization (permittee) listed in Section 1 to apply for this Dust Control Operating Permit (DCOP) and to commit to all of the terms and conditions therein.							
b. Before disturbing soils on a parcel, enacting a grade change, constructing a structure and/or appurtenances, or installing, constructing, or modifying equipment that emits an air pollutant, you must contact and obtain all required permits from Clark County's Department of Comprehensive Planning, Building Department, Department of Air Quality (Title 30 Notice) and the municipality with jurisdiction.							
c. The permit issued in response to this application is not a substitute for obtaining the property owner's permission to use land associated with the project. Issuance of the DCOP is intended only for controlling the emission of air pollutants and assuring compliance with the AQRs. Clark County cannot be held liable for any unauthorized use of the land.							
d. If applying on behalf of the permittee listed in Section 1, the permittee shall be responsible for complying with requirements of this DCOP and the AQRs. Otherwise, the applicant listed in Section 1 shall be the responsible party.							
e. The permittee accepts responsibility for assuring that all contractors, subcontractors, and other persons on the construction site defined by this permit comply with the terms and conditions of the DCOP, the associated Dust Mitigation Plan and the AQRs.							
f. In accordance with the DCOP and the AQRs, the applicant and the permittee shall consent to inspection of the site during normal hours of operation by DAQ staff without prior notice to determine compliance with the terms and conditions of the DCOP and the AQRs.							

- g. If the project has 50 or more acres of actively disturbed soil, the permittee shall notify DAQ and identify the on-site Dust Control Monitor for the project(s). In addition, this notification requirement applies to the following circumstances:
- When the permittee has common control of multiple adjacent projects that individually have less than 50 acres of actively disturbed soil, but the combined project has 50 or more acres of actively disturbed soil; or
 - When the permittee has common control of multiple projects that are not adjacent, but are within a common master-planned community and have 50 or more acres of actively disturbed soil.
- The permittee shall notify DAQ using the current notification form, which is available on the DAQ website and at the front counter of the main office, before disturbing the soil. The Dust Control Monitor must be on-site at all times when construction activities occur and shall manage dust prevention and control on-site.

Applicant Certification

JOY BROOKS		9/9/2020
Responsible Official Name	Applicant's Signature	Signature Date

Advisories

- a. DCOP acreage fee is based on total project acreage of disturbed surface area (Item 4.a. of this application), which is rounded up to the next whole acre. If the project is less than 1 acre, a minimum of 1 acre shall apply to the project for fee purposes. All fees must be paid in full at the time of application; otherwise, the application cannot be accepted.
- b. Any payment made to the department in conjunction with this application may only be refunded to the permittee with the approval of the Board of County Commissioners. Approved refunds may not be issued to a preparer. Only the applicant or permittee may request a refund, which must contain written justification, a completed federal W-9 Form, a copy of the invoice/receipt, a completed Clark County Supplier Addition/Maintenance/Update form, and a copy of the cancelled check (front & back) . The Control Officer shall have sole discretion to approve/disapprove the request for refund approval.
- c. Stormwater Advisory: Be advised that all land disturbances that exceed 1 acre or are adjacent to a waterway must submit a "Notice of Intent" to the Nevada Division of Environmental Protection that certifies a Storm Water Pollution Prevention Plan has been developed and is maintained for the site. Contact NDEP at (775) 687-9429 for an application, information, and instructions.
- d. Payment : Invoice payments must be made by check, money order, or credit card. Checks and money orders must be made payable to **Department of Air Quality or DAQ**. Credit card payment must be made in person at the DAQ main office.

ESE/213
HRM
10/1/20

DUST MITIGATION PLAN

Permit # :		NEW	
Project Name:	ELM SERIES CAPACITOR PROJECT		
Company (Permittee):	SOUTHERN CALIFORNIA EDISON		
Total Project Area Disturbed:	34.7 HRM	Particulate Emission Potential (PEP):	LOW/MODERATE LOW

If the project acreage is ten acres or more or if project trenching activities are one mile in length or more, a detailed supplement to the Dust Mitigation Plan must be submitted with this application in accordance with Section 94.5.5 of the Clark County Air Quality Regulations (AQRs) and Appendix B of the Construction Activities Dust Control Handbook.

Water Source (check all that apply)	Water Application Method (check all that apply)
<input checked="" type="checkbox"/> Hydrant with Jones Valve <input type="checkbox"/> Stand Tanks <input checked="" type="checkbox"/> Ponds <input type="checkbox"/> Well <input type="checkbox"/> Other (Describe Below): <div style="border: 1px solid black; height: 30px; margin-top: 5px;"></div>	<input type="checkbox"/> Fire Hose <input checked="" type="checkbox"/> Water Trucks/Pulls <input type="checkbox"/> Other (Describe Below): <div style="border: 1px solid black; height: 80px; margin-top: 5px;"></div>

Project Activities:

The Dust Mitigation Plan applies to the following project activities: **Backfilling** (Filling area previously excavated or trenched); **Blasting - Abrasive** (Sandblasting and/or abrasive blasting); **Blasting Soil & Rock** (Explosive blasting of soil and rock); **Clearing & Grubbing** (Clearing and grubbing for site preparation and vacant land cleanup); **Clearing Forms, Foundations and Slabs** (Clearing and cleaning of forms, foundations and slabs prior to pouring concrete); **Crushing** (Crushing of construction and demolition debris, rock and soil); **Cut and/or Fill** (Cut and/or fill soils for site grade preparation); **Demolition - Mechanical/Manual** (Mechanical and manual demolition of walls, stucco, concrete, freestanding structures, buildings, load-bearing walls and/or removal of transit pipe); **Disturbed Soil** (Disturbed soil throughout project including between structures); **Disturbed Land - Long Term Stabilization** (Large tracts of disturbed land that will not have continuing activity for more than 30 days); **Dust Suppressants** (Selection and use of chemical and organic dust suppressing agents and other dust palliatives); **Importing/Exporting Materials** (Importing or exporting of soil, aggregate, decorative rock, debris, Type II and other bulk material); **Landscaping** (Installation of sod, decorative rock, desert or other landscape material); **Paving/Subgrade Preparation** (Subgrade preparation for paving streets, parking lots, etc.); **Sawing/Cutting Material** (Sawing or cutting materials such as concrete, asphalt, block or pipe); **Screening** (Screening of rock, soil or construction debris); **Staging Areas** (Staging areas, equipment storage, vehicle parking lots, and material storage areas); **Stockpiles** (Stockpiling of materials, such as Type II, other soils, rock or debris, for future use or export); **Trackout Prevention and Cleanup** (Prevention and cleanup of mud, silt and soil tracked out onto paved roads); **Traffic - Unpaved Routes and Parking** (Construction related traffic on unpaved interior and/or access roads and unpaved employee/worker parking areas); **Trenching** (Trenching with track or wheel mounted excavator, shovel, backhoe or trencher); and **Truck Loading** (Loading trucks with materials including construction and demolition debris, rock and soil).

This DCP Application and Dust Mitigation Plan does not include project activities related to **Demolition - Implosion** (Implosive demolition of a structure, using explosives).

Best Management Practices (BMPs) - Control Measures:

The permittee shall comply with all requirements of Section 94 of the AQRs, all requirements of the current *Clark County Dust Control Handbook*, and all provisions of the DCOP issued from this application.

For each project activity listed in this Dust Mitigation Plan, the permittee shall comply with the requirements for the associated BMPs in the *Dust Control Handbook*. Where options are listed for a BMP requirement, the permittee shall apply one or more of the control measures to comply with the requirement. The permittee will apply corresponding control measures for the PEP for the project soil type(s).

DUST MITIGATION PLAN SUPPLEMENT**4A – PROJECT DESCRIPTION****Introduction**

Southern California Edison (SCE) is proposing the Eldorado-Lugo-Mohave (ELM) Series Capacitor Project (Project) which would involve constructing two new mid-line series capacitors and make other improvements to increase capacity and power flow along three existing 500 kilovolt (kV) transmission lines in San Bernardino County, California and Clark County, Nevada. The subsections that follow describe the Project activities that would occur within Nevada.

Project Location

Figure 1: Project Overview Map shows the project vicinity and its components in Clark County. SCE's existing Eldorado Substation is located near the intersection of United States (U.S.) Route 95 and Eldorado Valley Drive in the City of Boulder City. SCE's existing Mohave Substation is located near the intersection of Thomas Edison Drive and Bruce Woodbury Drive in unincorporated Clark County. SCE's existing McCullough Substation is located near the intersection of McCullough Pass and Route P in the City of Boulder City.

Project Activities

The Project includes the following main components within Nevada:

- Correction of one overhead clearance discrepancy¹ between Towers M4-T1 and M4-T2 along the Eldorado-Mohave 500 kV Transmission Line. To correct the discrepancy at this location, Tower M4-T1 will be raised by a minimum of approximately 18.5 feet and the tower's foundation will be modified as required.
- Installation of telecommunications facilities to connect the Proposed Project to SCE's existing telecommunications system, including the following:
 - removal of an existing overhead ground wire, modification of existing towers to support optical ground wire (OPGW), and installation of approximately 70 miles of overhead OPGW on SCE's existing Eldorado-Mohave and Lugo-Mohave 500 kV Transmission Lines;
 - installation of approximately 3 miles of underground fiber optic cable from Mohave Substation to existing Tower M173-T2 on the Lugo-Mohave 500 kV Transmission Line; and

¹ SCE has defined "discrepancies" as potential clearance problems between an energized conductor and its surroundings, such as the structure, another energized conductor on the same structure, a different line, or the ground. SCE has identified one discrepancy along the Eldorado-Mohave 500 kV Transmission Line in Nevada where modification of a transmission structure is needed to address National Electrical Safety Code overhead clearance requirements.

- installation of fiber optic cable within the existing Mohave and Eldorado Substations.
- Modifications within the existing Mohave, Eldorado, and McCullough Substations including the following:
 - upgrade of the existing series capacitor banks at Eldorado Substation,
 - installation of new terminal equipment at Eldorado and Mohave Substations,
 - replacement of the existing series capacitor bank at Mohave Substation,
 - demolition and removal of an existing structure/shed at Mohave Substation, and
 - replacement of five existing 500 kV circuit breakers at McCullough Substation.

Construction Schedule

Construction is scheduled to begin in October 2020 and is expected to take approximately 21 months to complete.

Construction Contractors

The following contractors will be working on the Project:

EPC Contractor- Beta Engineering

Grading and Below Grade Contractor- ACC Construction INC (ACC)

Electrical Contractor- CA Energy Power (NRG)

Testing Contractor- Siemens

UG Telecom Contractor- TBD

Substation Upgrade Contractor- SC&MDust Control Budget

The total dust control budget for the Project is approximately \$180,000.

Disturbance Area

Because the project is located along an existing 500kV overhead transmission alignment, the OPGW construction process will begin at the north end of the alignment and will continue south along the alignment until the project is complete. The total area of non-linear project disturbance will be approximately 61.5 acres.

4B – SITE PLAN

A detailed site plan has been included in Attachment A: Detailed Site Plan. The Project will occur within one phase. The construction activities are described in Section 4A – Project Description. The laydown yards and existing substation sites may be used for temporary construction offices. Attachment A: Detailed Site Plan shows the access roads that will be used for the Project. All temporary work areas, indicated in the maps, may be treated with dust palliatives. As per the phone conversation with Heather MacKinnon from the Clark County Department of Air Quality (DAQ) on January 10, 2019, the determination of the Particulate

Emission Potential (PEP) and accompanying soils analysis is no longer required for projects that are 50 acres or greater in size. Upon review of the DAQ's Dust Control Handbook, all project activities located north of Tower 51-T2 on the Eldorado-Mojave 500 kV Transmission Line are assumed to be located in an area of High PEP. The remainder of the project is assumed to be in an area of Moderate Low PEP. A list of parcels crossed by the project has been included as Attachment B: Parcel List.

4C –EXPLANATION OF CONTROL MEASURES

The control measures that will be implemented during the Project will be in accordance with the DAQ's Dust Control Handbook.

Wind Events

If wind speeds become excessive (15+ mph gusts) and typical control methods cannot provide adequate dust control, SCE will implement additional, reasonable efforts, such as applying additional water and/or water/surfactant mixture, covering materials, or shutting down operations if necessary. If operations are shut down as a control method, water and/or water/surfactant mixture application will continue, as required.

4D – CONTINGENCY PLAN

SCE will comply with all applicable rules and regulations regarding fugitive dust as a result of construction activities, including Sections 40, 41, 90, 92, and 94 as applicable to the Project as well as the Clark County DAQ's Construction Activities Dust Control Handbook. The dust control monitor will observe construction activities for visible emissions crossing property lines. Since excessive fugitive dust emissions are easily detected visually, this will be the method for determining whether the dust control measures being employed are adequately controlling fugitive dust emissions. In the event that dust control measures are not adequately controlling fugitive dust emissions, the frequency of watering/use of dust palliatives will be increased to adequately suppress fugitive dust emissions associated with Project activities such that visible emissions do not cross property lines. The suppression of visible emissions by increased watering/application of chemical stabilizers would also inhibit the creation of nuisance conditions, as described in Section 40 of the Clark County DAQ rules and regulations.

4E – SOIL STABILIZATION MEASURES

As previously stated in Section 4C – Additional Explanation of Control Measures, unpaved non-public traffic and parking areas designated for utilization during Project construction would be effectively stabilized to control dust emissions.

For non-traffic areas, water will be used as the primary dust control measure. Water will be applied at a minimum of 4 times per day. Additional water will be utilized as needed. Should water not control the dust from the project, a soil binder will be applied to those areas that require additional dust control measures in accordance with the manufacturer's specifications.

The preferred soil binder to be used and applied to non-traffic areas would be synthetic polymers. The following is the preferred manufactured product within this product type:

Soil Binder Brand:FSB 1000

Application Rate: 150 gal/acre

Frequency: One time

Final Stabilization: Shall be determined by the SWPPP

Other possible soil binder product types for non-traffic areas may include organic non-petroleum-based products or may be standard fibers/mulches.

- The application procedures of soil binders on non-traffic areas would be as follows:
- When feasible, begin implementation of final stabilization BMPs when the area is no longer required for construction; otherwise implement temporary stabilization practices.
- The Contractor shall be responsible for onsite revegetation of temporary disturbance areas as required by the environmental documents and permits. Prior to implementation of the final stabilization BMPs, the Contractor's Qualified SWPPP Developer (QSD) shall coordinate with the Contractor's restoration biologists and the SCE QSD to identify if the area will be stabilized through revegetation or through the use of stabilization BMPs without vegetation to achieve final stabilization to satisfy the Notice of Termination (NOT) requirement of the General Permit.
- Following construction activities, the Contractor's biologist will evaluate whether reseeding is recommended, as well as recommend seed mix, seeding rate, and application methods, in consultation with SCE and the applicable agencies.
- For non-vegetative stabilization methods, RUSLE2 shall be used to ensure that post-construction sediment loss does not exceed preconstruction sediment loss. Where vegetative stabilization is required, the contractor shall evaluate additional stabilization BMPs to be used to determine if the area can be removed from permit coverage using the RUSLE2 method. Typical stabilization BMPs and conditions are presented below; RUSLE2 verification should be performed prior to implementation of BMPs and is required for a NOT.
- Temporary BMPs (except perimeter controls), construction material, and wastes shall be removed prior to implementation of final stabilization BMPs.

Minimum post-construction BMPS for all temporary disturbance areas:

- Track walk, sheepsfoot roll, or otherwise roughen disturbed areas with care to preserve any remaining vegetation.
- Apply wood fiber hydraulic mulch at 2500 pounds per acre. (this will likely be Earthguard Fiber Matrix)

For traffic areas, water will be the primary method of dust control. Water will be applied at a minimum of 4 times per day. Additional water will be utilized as needed. It is not likely that a soil binder will be used to control dust on traffic areas. However, should the need arise, a soil binder will be applied to those areas per the manufacturer's specifications.

The preferred soil binder to be used and applied to traffic areas would also be synthetic polymers for continuity in product applications. The following is the preferred manufactured product at applications of this product type on traffic areas:

Soil Binder Product: FSB 1000

Application Rate: 175 gal/acre and per inch of stabilized road surface, plus 100 gal/acre topical. (i.e. one acre of stabilized road at 4" is 800 gal)

Frequency: One time

Final Stabilization: Shall be determined by the SWPPP

Other possible soil binder product types to use on traffic areas may include organic non-petroleum-based products or magnesium chlorides.

The application procedures of soil binders on traffic areas would be as follows:

- When feasible, begin implementation of final stabilization BMPs when the area is no longer required for construction; otherwise implement temporary stabilization practices.
- Compact disturbed soils as required by engineering specification and document compaction test for inclusion with a NOT.
- Provide documentation of stabilization, including photos, to SCE QSD for verification that criteria have been met for removal from General Permit coverage.
- Remove temporary BMPs and demobilize from the area.

4F – EMPLOYEE DUST CONTROL TRAINING AND COMPLIANCE.

As required by the DAQ's Construction Activities Dust Control Handbook, the construction site superintendent(s), foremen, water truck/pull driver(s), and other designated on-site representative(s) will attend and successfully complete a Clark County Department of Air Quality and Environmental Management Dust Control Class or possess a current Dust Control Card. The Dust Control Monitor, along with on-site environmental inspectors, will ensure the Project remains in compliance with this plan.

4G – SIGNATURE



Joy Brooks

Senior Manager, Air Quality 9/15/2020

Page #	Location	Work Area Type	Acreage	Pull-Site	Guard Site	Site Access	Grading	Telecom
1	170-1	PS	0.03	0.03				
	170-1	PS	0.196	0.196				
2	173-2	PS	0.486	0.486				
3	1-3	GS	0.07		0.07			
4	1-1	GS	0.042		0.042			
5	0-2	GS	0.533		0.533			
6	MOH	SC6	0.468				0.468	
	MOH	SC6	0.445				0.445	
	MOH	Tele	0.935					0.935
	MOH	Yard	1.022					
	MOH	Yard	7.544					
7	6-2	PS	0.18	0.18				
	6-2	PS	0.195	0.195				
8	13-1	PS	0.047	0.047				
	13-1	PS	0.038	0.038				
9	16-3	PS	0.141	0.141				
	16-3	PS	0.112	0.112				
10	19-3	PS	0.118	0.118				
	19-3	PS	0.106	0.106				
11	23-1	PS	0.129	0.129				
	23-1	PS	0.107	0.107				
12	26-2	PS	0.023	0.023				
13	36-4	SA	0.047			0.047		
14	49-4	PS	0.11	0.11				
	49-4	PS	0.11	0.11				
15	49-5	PS	0.096	0.096				
16	56-1	SA	0.401			0.401		
17	56-1	PS	0.371	0.371				
	56-1	SA	0.159			0.159		
18	59-2	Yard	4.203					
	ELD	SC3	0.645				0.645	
	ELD	Tele	1.028					1.028
	ELD	MH	0.021					
	ELD	MH	0.021					
	ELD	MH	0.021					
SUBTOTAL				2.595	0.645	0.607	1.558	1.963
TOTAL				20.2				

Manholes	Yard
	1.022
	7.544
	4.203
0.021	
0.021	
0.021	
0.063	12.769

52923-00 = 34.7

266 00 001 006

HRM 10/1/20

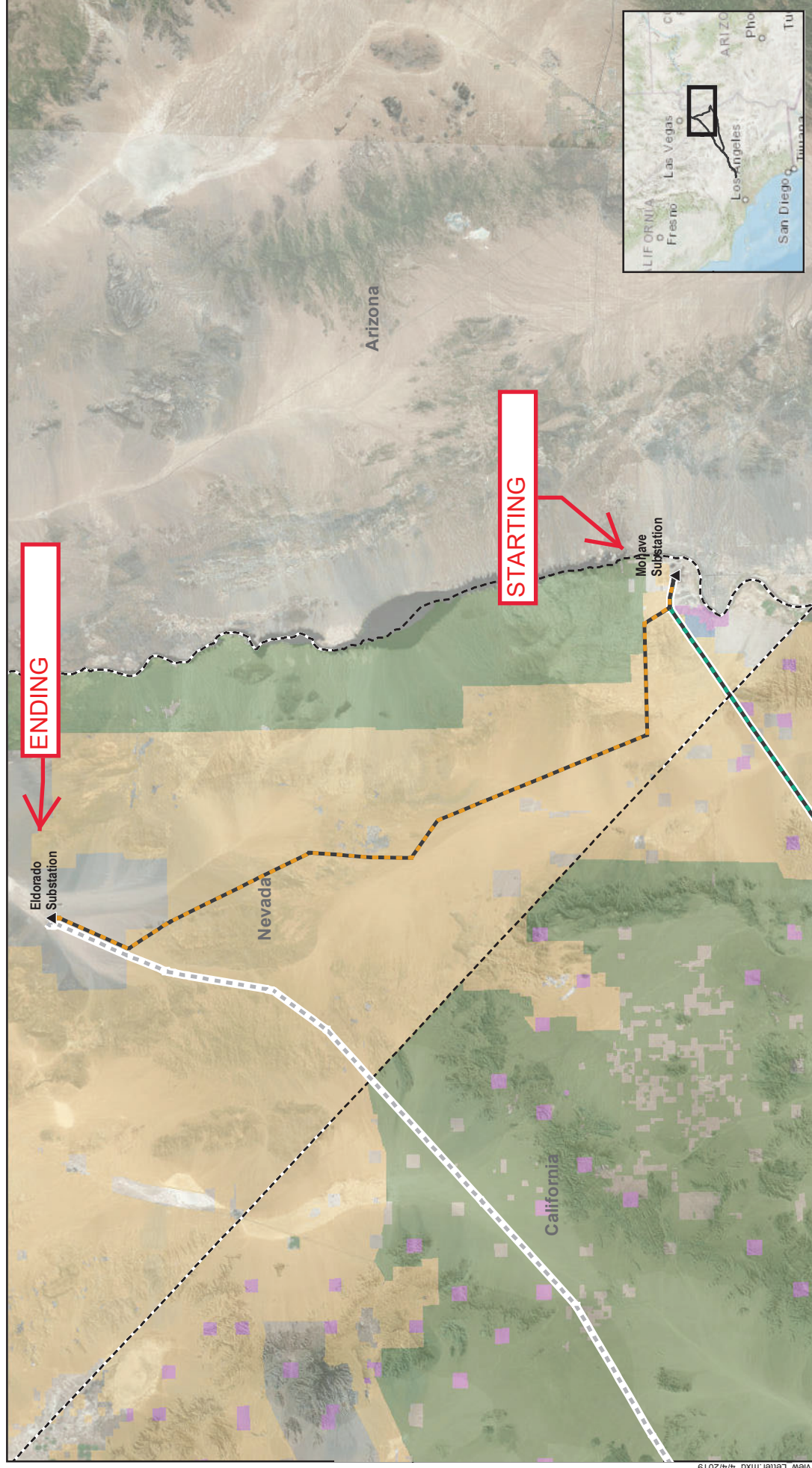
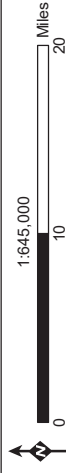


Figure 1: Proposed Project Overview Map

Eldorado-Lugo-Mohave Series Capacitor Project



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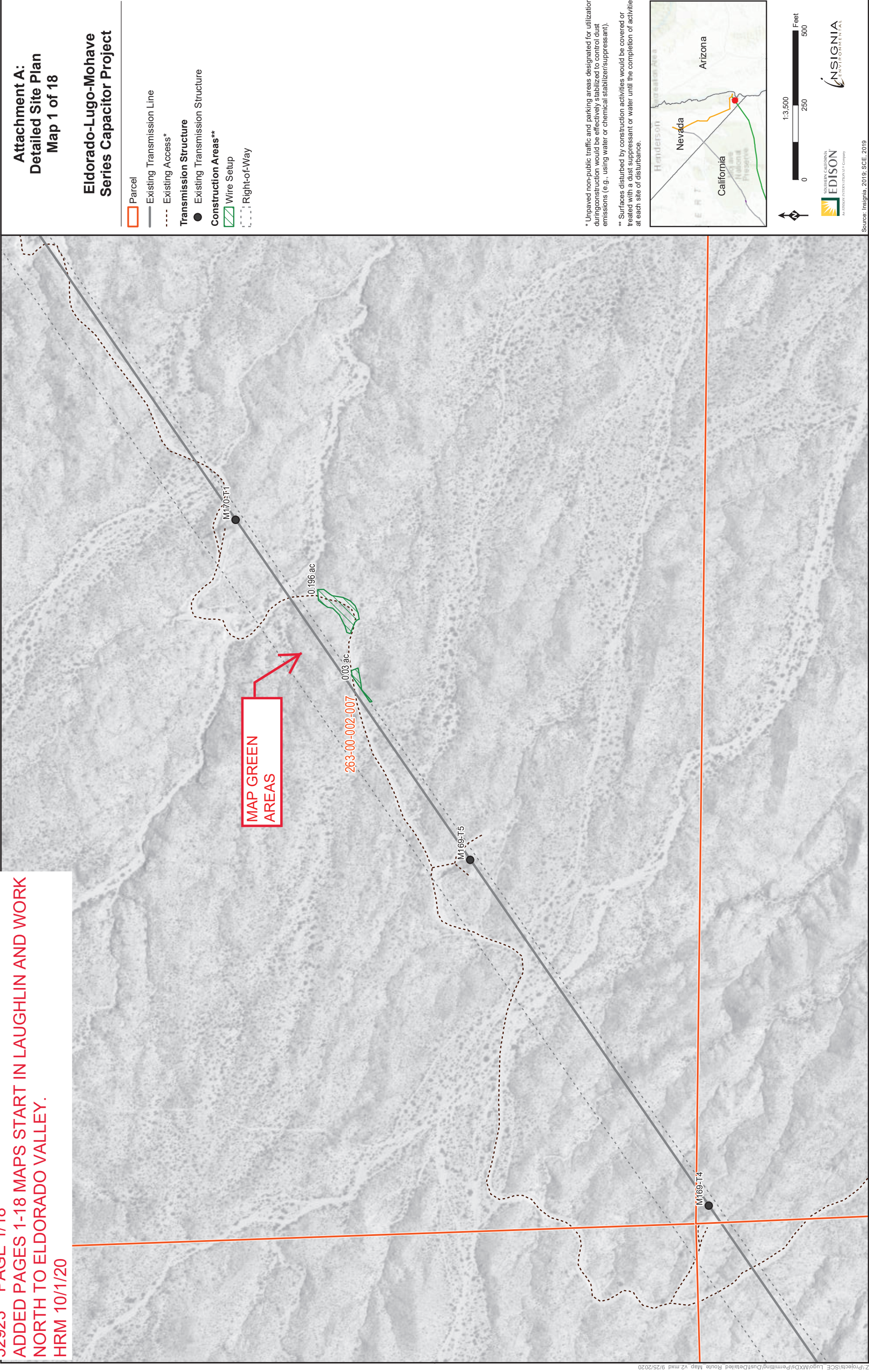
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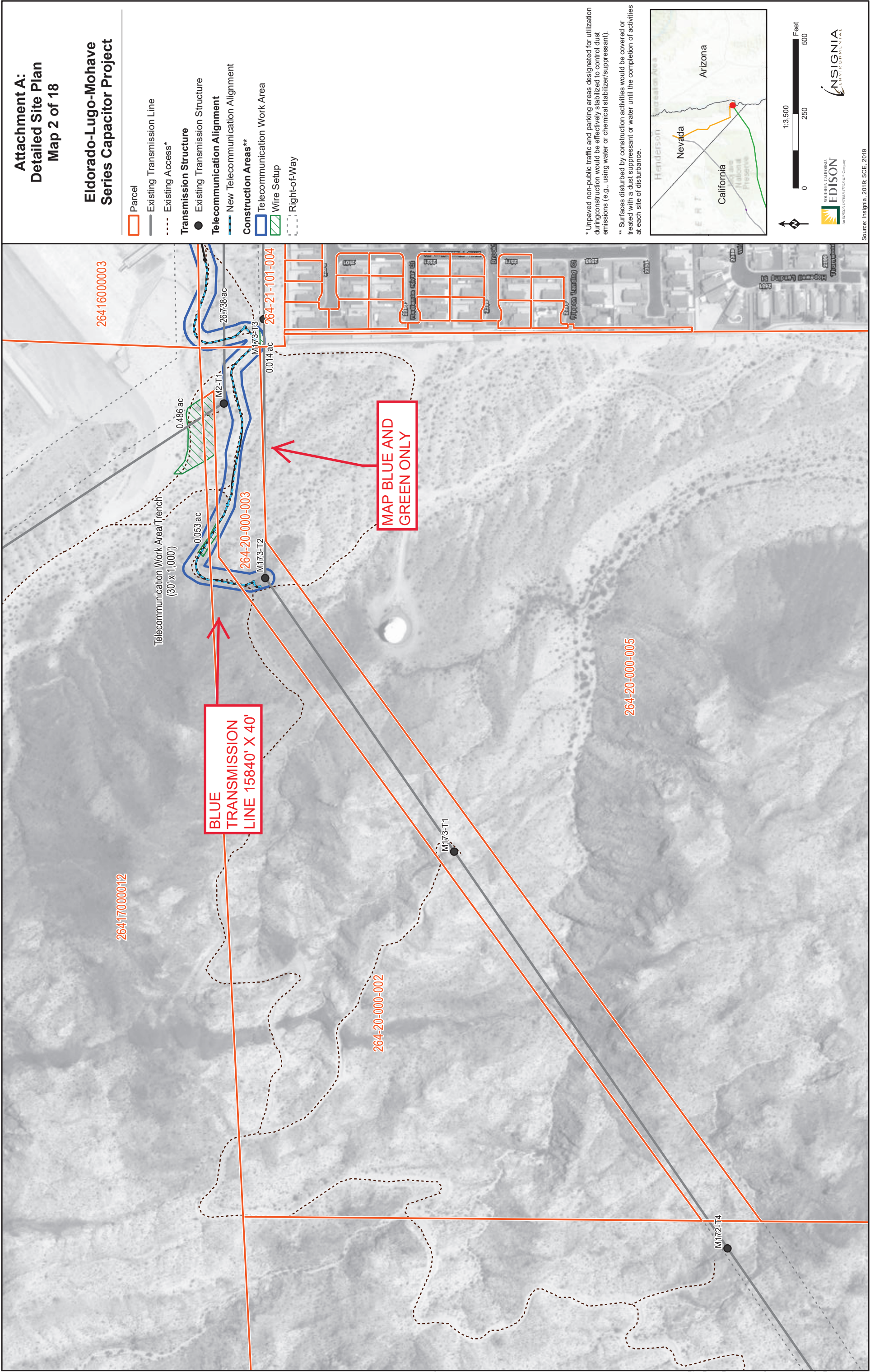
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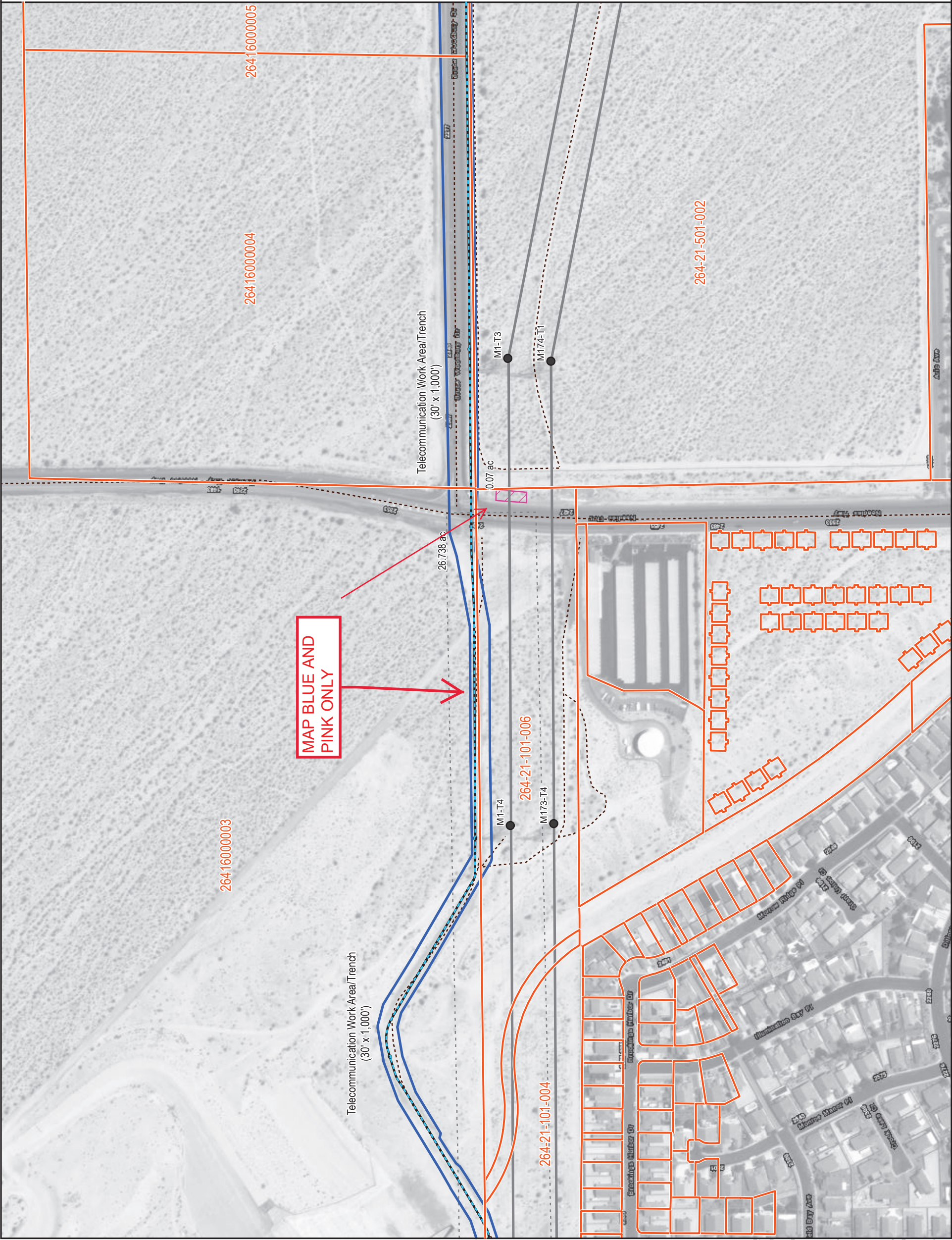
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52923 PAGE 1/18
ADDED PAGES 1-18 MAPS START IN LAUGHLIN AND WORK
NORTH TO ELDORADO VALLEY.
HRM 10/1/20







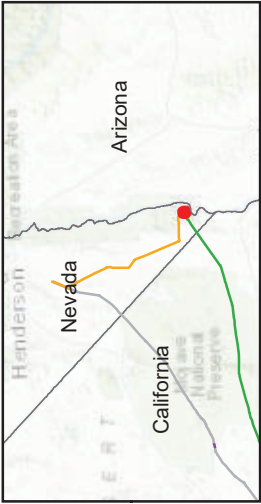
**Attachment A:
Detailed Site Plan
Map 3 of 18**

**Eldorado-Lugo-Mohave
Series Capacitor Project**

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure**
- Existing Transmission Structure
- Telecommunication Alignment**
- New Telecommunication Alignment
- Construction Areas****
- Guard Structure Area
- Telecommunication Work Area
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



26416000005

26416000006

26415401002

26415401001

26415401004

264-15-301-002

Telecommunication Work Area/Trench
(30' x 1,000')

26'738ac

0.042 ac

M1 T2

M174 T2

M1 T1

M174 T3

0.042 ac

M0 T4

M174 T4

264 22 000 001

264 21 501 002

Attachment A:
Detailed Site Plan
Map 4 of 18

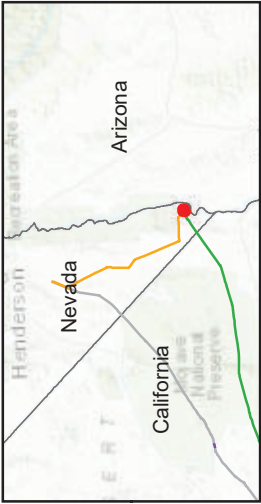
Eldorado-Lugo-Mohave
Series Capacitor Project

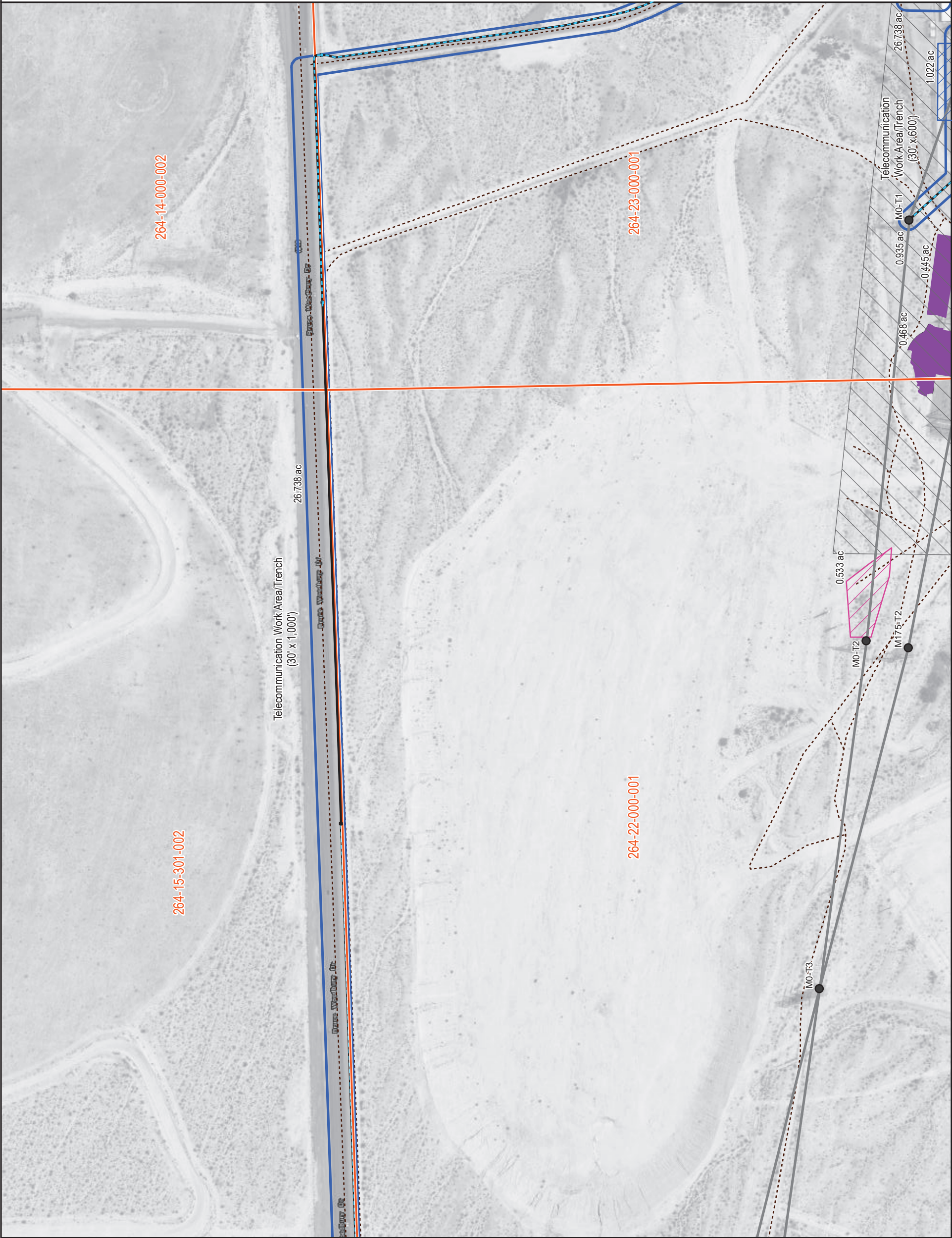
- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Telecommunication Alignment
- New Telecommunication Alignment
- Construction Areas**
- Guard Structure Area
- Telecommunication Work Area

MAP THESE AREAS
ONLY

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





Attachment A:
Detailed Site Plan
Map 5 of 18

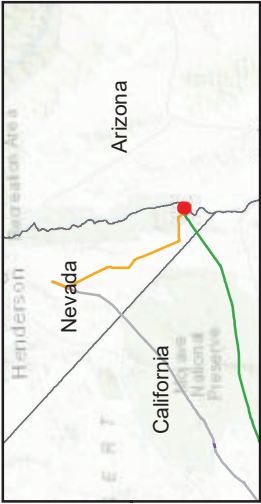
Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Access Road
- Transmission Structure
- Existing Transmission Structure
- Telecommunication Alignment
- New Telecommunication Alignment
- Construction Areas**
- Guard Structure Area
- Telecommunication Work Area
- Substation Areas**
- Substation Boundary
- Construction Material Yard**
- Civil Design Work Areas**
- Substation Grading Limit

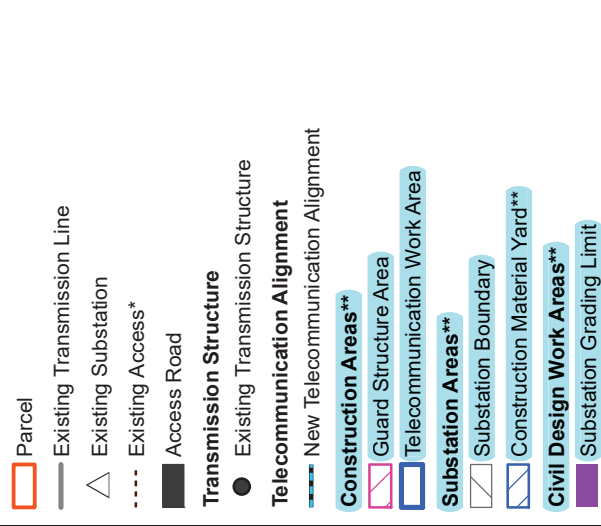
MAP THESE
AREAS

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



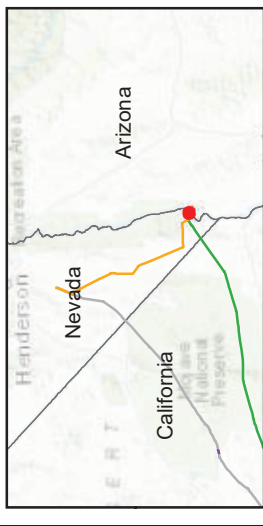
**Attachment A:
Detailed Site Plan
Map 6 of 18**



MAP THESE
AREAS ONLY

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

**** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.**



Attachment A:
Detailed Site Plan
Map 7 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
- Right-of-Way

Transmission StructureExisting Transmission StructureConstruction Areas**Wire SetupRight-of-Way

MAP THIS ONLY

0.195 ac

0.18 ac

M5-T4

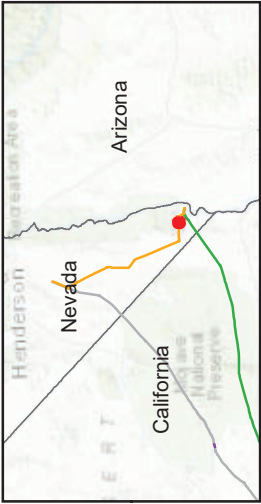
M6-T1

M6-T2

263 00 001 018

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





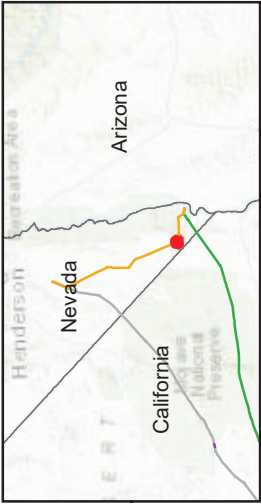
Attachment A:
Detailed Site Plan
Map 8 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure**
- Existing Transmission Structure
- Construction Areas****
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





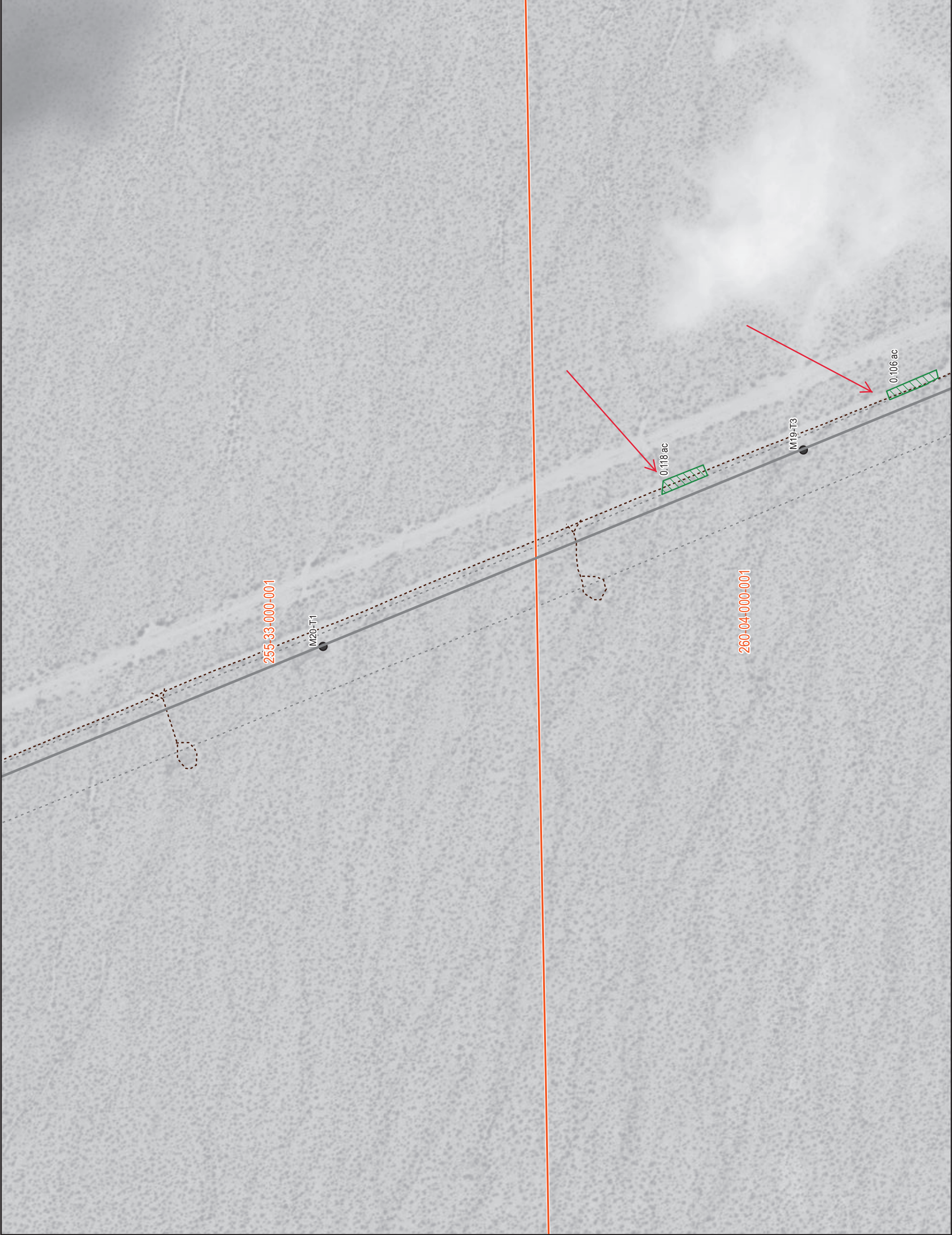
Attachment A:
Detailed Site Plan
Map 10 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel

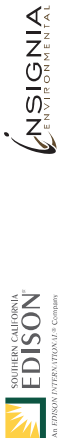
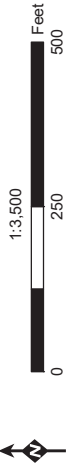
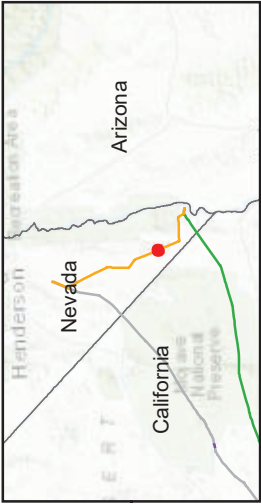
Existing Transmission Line

Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
- Right-of-Way



* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



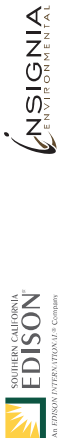
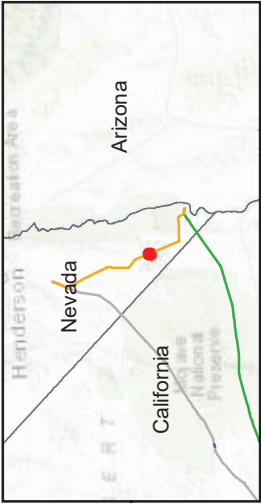
Attachment A:
Detailed Site Plan
Map 11 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



12/18 52923

249-00-002-013

0.023 ac



M26-T1



255-06-000-001

M25-T4



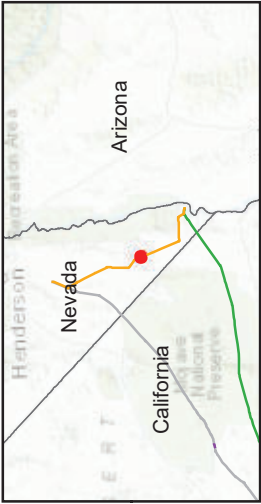
Attachment A:
Detailed Site Plan
Map 12 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





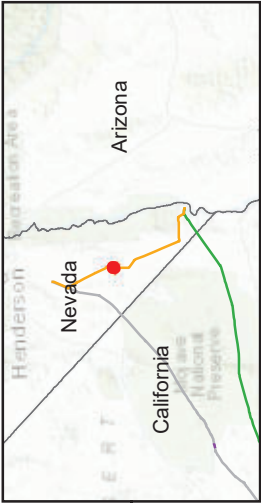
**Attachment A:
Detailed Site Plan
Map 13 of 18**

**Eldorado-Lugo-Mohave
Series Capacitor Project**

- Parcel
 - Existing Transmission Line
 - Existing Access*
- Transmission Structure**
- Existing Transmission Structure
- Construction Areas****
- Site Access
 - Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





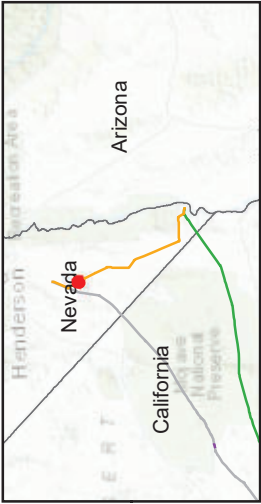
Attachment A:
Detailed Site Plan
Map 14 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

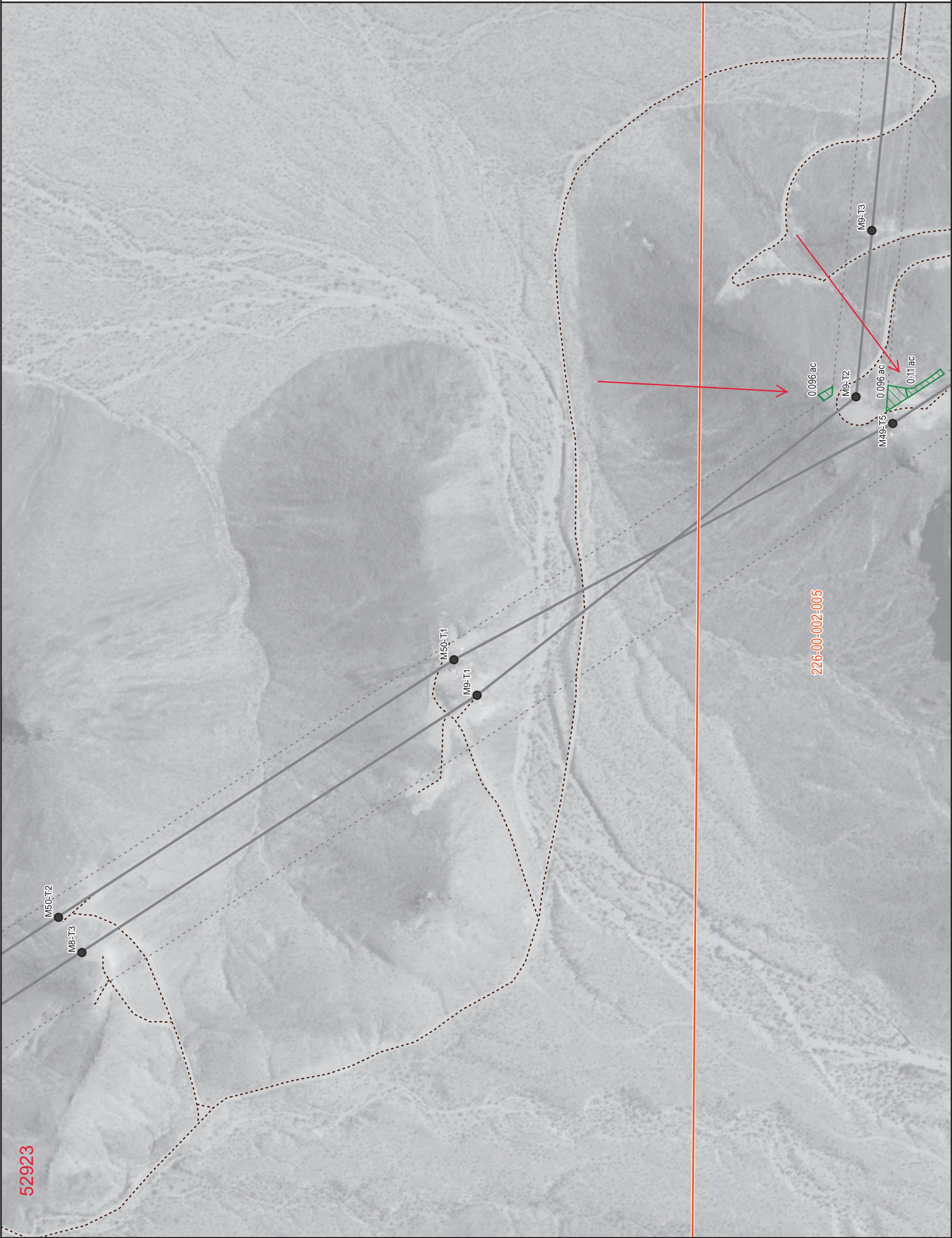
- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



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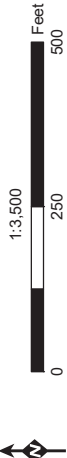
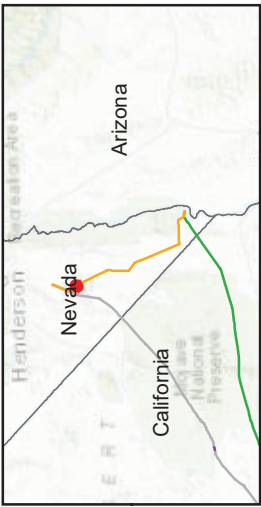
Attachment A:
Detailed Site Plan
Map 15 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
 - Existing Transmission Line
 - Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Wire Setup
 - Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.





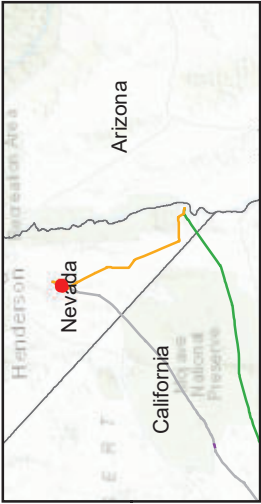
Attachment A:
Detailed Site Plan
Map 16 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Site Access
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



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Attachment A:
Detailed Site Plan
Map 17 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

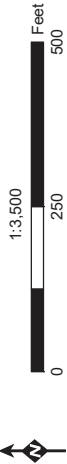
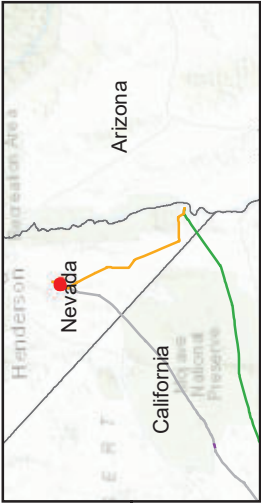
- Parcel

Existing Transmission Line

Existing Access*
- Transmission Structure
- Existing Transmission Structure
- Construction Areas**
- Site Access
- Wire Setup
- Right-of-Way

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



Attachment A:
Detailed Site Plan
Map 18 of 18

Eldorado-Lugo-Mohave
Series Capacitor Project

- Parcel
- Existing Transmission Line
- Existing Substation
- Existing Access*
- Existing Transmission Structure
- Existing Transmission Alignment
- Existing Telecommunication Alignment
- New Telecommunication Alignment
- Construction Areas**
- Telecommunication Work Area
- Substation Areas**
- Substation Boundary
- Construction Material Yard**
- Civil Design Work Areas**
- Substation Grading Limit

Telecommunication Alignment

Existing Telecommunication Alignment

New Telecommunication Alignment

Construction Areas**

Telecommunication Work Area

Substation Areas**

Substation Boundary

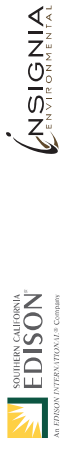
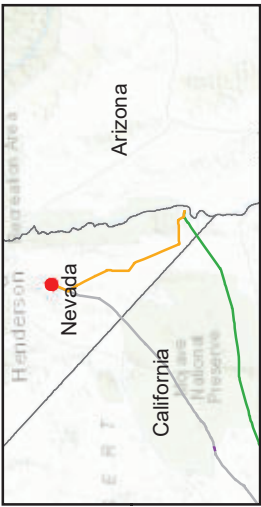
Construction Material Yard**

Civil Design Work Areas**

Substation Grading Limit

* Unpaved non-public traffic and parking areas designated for utilization during construction would be effectively stabilized to control dust emissions (e.g., using water or chemical stabilizer/suppressant).

** Surfaces disturbed by construction activities would be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance.



From: Dane Anderson
To: Heather Mackinnon
Cc: B611DocCtrl
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Date: Monday, September 28, 2020 6:31:59 PM
Attachments: images002.png
ELM CC Dust Control Permit App_20200928 (Page 2).pdf
FINAL ELM Clark County Dust Control Map (09-25-205).pdf
ELM- DCOIP Disturbance Areas.xlsx

Hi Heather,
Here is the revised app (page 2), map, and acreage calcs.

I've also provided a couple [responses to your comments](#) below.

I hope this covers everything we've discussed and we can move this permit along (fingers crossed).

Thanks,

Dane Anderson, EI
Project Engineer
Beta Engineering
858.750.2370 x834 Office
858.368.3934 Direct
847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Heather Mackinnon <MacKinn@ClarkCountyNV.gov>
Sent: Thursday, September 24, 2020 9:57 AM
To: Dane Anderson <dane.anderson@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Importance: High

Dane,

I spoke to my supervisor and she is on the same page as me. I will need to call you later this afternoon. I have a meeting and will not be back in office until 12:30.

- Start deleting any pages that do not have any soil disturbance like pages 2, 4, 5, 6, 12, 14, 16, 17, 19, 20, 24, 25, 27, 28, 29, 33, 34, 35, 38, 40, 42, 43, 44-51, 54, 56, 58, all of these don't any areas that need to be permitted.
 - OK
- We want grayscale and color ONLY areas that need to be permitted, and put acreage on each of these areas.
 - OK. Though the property lines also are colored red.
- Helicopter landing zones **do not need to be permitted or even on any map.**
 - OK. These areas have been removed from the maps
- I need ONE APN per page, please make it much bigger.
 - Due to the automatic map development from GIS, this would need to be done manually. We hope that the additional APNs helps to locate the work areas.
- Pg 7, looks like a lot going on, use one color for the blue and green areas with acreage. If it is a trench, please put the length x width on each page. This has been added
Is the blue area the trench? Yes.
Why would you be trenching along the paved area (pg 9)? At lattice tower M173-T2 (on page 7), the optical groundwire goes from overhead to underground. A 3-mile trench is to be installed for the underground section of the fiber optic cable from this tower to the existing Mohave Substation.
"walking travel paths" delete. OK
- Pg 10, if this yellow area is not part of the disturbance, delete. We don't care about substation boundaries, or where the substation is.
 - The work area boundary at the substations were retained (we would like for this to remain to maintain consistency with our approved project work areas here), but is grayed out to show that it is not included in the area calc.
- Pg 11, if the construction material yard is on dirt, that must be permitted. If it is on pavement, it does not unless you are storing soils on it.
 - The 3 yards that have been included in the map are on gravel and have been identified.

See how that goes.

Regards,

Heather Mackinnon

Effective July 27, 2020 – New office hours are M-TH, 7:30 – 5:30.
DES offices are not open to the public at this time.
All County offices are closed on Fridays.

Air Quality Specialist II
Department of Environment and Sustainability
Air Quality Division – Enforcement Section
4701 W. Russell Road #200
Las Vegas NV 89118
Phone: (702) 455-1524 Fax: (702) 383-9994

For Dust Control Applications and Forms, click on link.

https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/permitting/applications_forms/dust_permitting_forms.php#outer-4005

You must use **INTERNET EXPLORER** as your search engine. If you have your default browser set to anything else, such as Chrome, the forms will not work.

From: Dane Anderson [<mailto:dane.anderson@betaengineering.com>]
Sent: Wednesday, September 23, 2020 2:24 PM
To: Heather Mackinnon <MacKinn@ClarkCountyNV.gov>; Joy Brooks <joy.s.brooks@sce.com>
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>

Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hello Heather,
I've attached the updated page 2 of the application.

We've also revised the detailed map. Here is the link to access the map:
<https://betaengineering.sharefile.com/d-s07af16371754ad5b>

As discussed, we removed the work areas within the SCE transmission right-of-way that we do not intend to grade. Any portion of these work areas that extend outside of the right-of-way have been included in our area calcs.

The resulting breakdown of areas is as follows:

Non-Linear Workspace Type	Outside ROW (acres)
Ground Disturbance at Existing (Eldorado & Mohave) Substations, including: Structure Demolition, non-linear UG telecom, & Grading	11.16
Helicopter Landing Zones (outside of ROW)	10.42
Telecommunication work areas (Non-linear telecom work areas completed at the existing substations)	Included with ground disturbance at existing substations
Wire Setup (outside of ROW)	2.22
Tower Work (outside of ROW)	0.34
Man holes	Area included with the linear telecom work area or ground disturbance at existing substations
Newly Disturbed Travel Paths (outside of ROW)	0.04
Parking/Staging Areas	11.74
Guard Structures	0.52
Grand Total	36.4

Dane Anderson, EI
Project Engineer
Beta Engineering
858.750.2370 x834 Office
858.368.3934 Direct
847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Heather Mackinnon <MackInno@ClarkCountyNV.gov>
Sent: Monday, September 21, 2020 9:47 AM
To: Dane Anderson <dane.anderson@betaengineering.com>; Joy Brooks <joy.s.brooks@sce.com>
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hello,

On the application you sent me, you have not done page 2 correctly. If you are using the application with Internet Explorer it will not let you enter anything more than a 10th of an acre. And, you do not currently have 3.6 NONLINEAR acres according to your reply below, you have approximately 47.9 NONLINEAR acres, and your LINEAR is not carried over to the right side, telling me you are not using the application correctly.
You are now stating you have 47.9 NONLINEAR, plus the 14.5 LINEAR, please redo page 2 correctly.

See below in all **BOLDED CAPS** for replies.

Regards,

Heather Mackinnon

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Air Quality Specialist II
Department of Environment and Sustainability
Air Quality Division – Enforcement Section
4701 W. Russell Road #200
Las Vegas NV 89118
Phone: (702) 455-1524 Fax: (702) 383-9994

For Dust Control Applications and Forms, click on link.
https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/permitting/applications_forms/dust_permitting_forms.php#outer-4005

You must use **INTERNET EXPLORER** as your search engine. If you have your default browser set to anything else, such as Chrome, the forms will not work.

From: Dane Anderson [<mailto:dane.anderson@betaengineering.com>]
Sent: Friday, September 18, 2020 3:33 PM
To: Heather Mackinnon <MackInno@ClarkCountyNV.gov>; Joy Brooks <joy.s.brooks@sce.com>
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hello Heather,
I've been working on addressing each of your comments. The comments were straight forward, but required some additional work to break down the numbers as you've requested.

As you've indicated, the primary activity for the transmission work locations is to replace an existing overhead groundwire (OHGW) with optical groundwire (OPGW), which doesn't directly

require ground disturbance. However, within each of the transmission work areas, vegetation will need to be cleared and minor construction grading may need be performed to prepare flat, level pull-sites to setup the wire pulling equipment. We believe that this site preparation may result in minor dirt disturbance for the overhead work areas, so it has been included in the dirt disturbance calculations and maps in the non-linear sections.

IF YOU ARE CHANGING THE GRADE OF THE AREA, IT WILL NEED TO BE INCLUDED, IF NOT DELETE THE MAPS WITH JUST THE POLE.

If this construction activity does not need to be considered because it does not involve design grading or design digging, then these overhead work areas can be removed from our dirt disturbance calcs and the overall acreage can be reduced.

Please see my complete [responses to your questions](#) below.

Let me know if you have any other questions.

Thank you,

Dane Anderson, EI
Project Engineer
[Beta Engineering](#)
858.750.2370 x834 Office
858.368.3934 Direct
847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Heather Mackinnon <MacKinnon@ClarkCountyNV.gov>
Sent: Wednesday, September 16, 2020 10:51 AM
To: Dane Anderson <dane.anderson@betaengineering.com>; Joy Brooks <joy.s.brooks@sce.com>
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Importance: High

Hello,

I did not need another signed application.

We had provided the revised application so the official copy had a cell # included. We have provided revised application once again with the additional information requested below.

Just to clarify, is this line running from Laughlin Nv, to Boulder City Nv? The oversite map is not clear on that.

You're right about the overview map. It does not show the city in which the lines start and end.

There are 2 transmission lines, but the primary transmission line in NV does run from Laughlin to Boulder City.

The Eldorado-Mohave transmission line runs from Laughlin, NV to Boulder City, NV. The entire 60 miles of this line are in Clark County.

The other line is the Lugo-Mohave transmission line that runs from Laughlin, NV to Hesperia, CA. Approximately 15 miles (of 175) of this line are in Clark County.

On page 2 for the project location, the address entered does not exist. Please change page 2 in street field to starting point: street and city to ending point and you must list 2 major cross streets for your beginning point.

I've added the cross streets and city names for the start and end locations to the "Project Physical Location" section for the primary transmission line, the Eldorado-Mohave line.

Put an APN at the above location on page 2.

I've added the start and end APN's to the "Project Physical Location" section. **ON PAGE 2, YOU MUST ENTER ONE, SO ENTER THE STARTING APN. WE DO NOT NEED A BUNCH OF APNS.**

On the maps show an APN on each page to easily identify each pages work area. **ONLY ONE ON EACH MAP SO I CAN FIND THE AREAS.**

The detailed map provided includes the APNs on each page.

It appears that a lot of the maps are only replacing the transmission line with no digging correct? If so, just submit the maps that show dirt disturbance, see following.

All work areas have a potential for dirt disturbance, so they are retained in the maps. These can be removed if you disagree with this assertion. **AS STATED ABOVE, IF YOU ARE CHANGING THE GRADE, THEN INCLUDE IT, OTHERWISE NO.**

Provide each work areas acreage including all areas where dirt disturbance will occur but not limited to below.

- Trench length/width for the aprox. 3 miles of underground fiber optic (please be aware that the width must include trench width, spoils piles, equipment digging trench and any support vehicle disturbance alongside of trench). Please put this in the LINEAR section on page 2.

I've updated the Linear section of page 2 to include the UG telecom work area on Bruce Woodbury Drive, which was previously included with the non-linear work areas.

This work area increased slightly due to rounding up the width to 40FT in the linear section of the permit.

All other will be put in the NONLINEAR section for these areas below where there will be dirt disturbance including parking, staging, trailers etc., again, you must justify how you came to 61.5 acres.

• Structure demolitions & Grading work area (demolition will happen within the larger graded area)	0.80 acres	
• Helicopter landing zone	10.69 acres	DO NOT NEED IF YOU ARE NOT GRADING
PADS FOR LANDING ??		
• Telecommunication work areas (Non-linear telecom work areas completed at the existing substations)	2.47 acres	
• Wire set up	12.77 acres	
• Tower work	2.57 acres	
• Man holes (a total of 14, 30FTx30FT manholes w/ aprons)		0.29 acres (this acreage is included with the
respective linear and non-linear telecom work areas)		
• Newly disturbed travel paths (foot paths to walk the initial pull line from the tower to the pull site)	0.78 acres	
• Staging, parking, equipment storage areas	17.50 acres	
TOTAL (for non-linear sections)	47.58 acres	47.87 = 47.9

Regards,

Heather Mackinnon

Effective July 27, 2020 – New County wide business hours are M-TH, 7:30 – 5:30, closed on Fridays.

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

4701 W. Russell Road #200

Las Vegas NV 89118
Phone: (702) 455-1524 Fax: (702) 383-9994

You must use **INTERNET EXPLORER** as your search engine. If you have your default browser set to anything else, such as Chrome, the forms will not work.

For Dust Control Applications and Forms, click on this link: [DUST FORMS](#)

From: Dane Anderson [<mailto:dane.anderson@betaengineering.com>]
Sent: Wednesday, September 16, 2020 9:57 AM
To: Heather Mackinnon <MackInno@ClarkCountyNV.gov>
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hi Heather,
Here are the revised signed copies of the application and SMP.

Please let me know if you need anything else to complete this application.

Thanks,

Dane Anderson, EI
Project Engineer
[Beta Engineering](#)
858.750.2370 x834 Office
858.368.3934 Direct
847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Dane Anderson <dane.anderson@betaengineering.com>
Sent: Tuesday, September 15, 2020 11:44 AM
To: MackInno@ClarkCountyNV.gov
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hi Heather,
There was a map that is included with the application, but it is rather large. I had asked for a means to provide the map outside of email.

I tried to send the map via email a moment ago, but I received an "undeliverable" message for your email.
I called the DAQ office to see if there were another means to provide the large file. We agreed that providing a sharefile link would be the next best submittal option.

Please use the following link to access that map that was to be included with the SMP as Attachment A:
<https://betaengineering.sharefile.com/d-sc21ae0061984f70a>

We will also be providing the revised signed copies of the application (with phone #) and SMP (with BMP's removed) shortly.

Please let me know that this email has been received.

If you have any other questions, please feel free to give me a call.

Thanks,

Dane Anderson, EI
Project Engineer
[Beta Engineering](#)
858.750.2370 x834 Office
858.368.3934 Direct
847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Dane Anderson <dane.anderson@betaengineering.com>
Sent: Tuesday, September 15, 2020 11:19 AM
To: MackInno@ClarkCountyNV.gov
Cc: Carol Cauthen <Carol.Cauthen@sce.com>; Rey Gonzales <Rey.Gonzales@sce.com>; B611DocCtrl <B611DocCtrl@betaengineering.com>
Subject: RE: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT

Hi Heather,
There was a map that is included with the application, but it is rather large. I had asked for a means to provide the map outside of email.

However, here is the map for you to review with the DCOP application.
Please let me know that it has been received.

We will also address your comments to the SMP shortly.

Thanks,

Dane Anderson, EI
Project Engineer
[Beta Engineering](#)
858.750.2370 x834 Office
858.368.3934 Direct

847.494.6609 Cell
www.betaengineering.com

This message is confidential and should only be used by the named recipients for the sender's business purpose.

From: Carol Cauthen <Carol.Cauthen@sce.com>
Sent: Tuesday, September 15, 2020 10:53 AM
To: Rey Gonzales <Rey.Gonzales@sce.com>; Dane Anderson <dane.anderson@betaengineering.com>
Subject: FW: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Importance: High

From External Sender

Looks like we still have some work to do on the dust plan.

Carol Cauthen
Air Quality Specialist
Operational Services | Environmental Services
T. 626-302-5073 | M. 626-485-6722
2244 Walnut Grove Ave, Rosemead, CA 91770



From: Joy Brooks <joy.s.brooks@sce.com>
Sent: Tuesday, September 15, 2020 10:50 AM
To: Carol Cauthen <Carol.Cauthen@sce.com>
Subject: FW: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Importance: High

Hi Carol,

Could you please help me with this? Thank you!

Joy Brooks, PE, CPP
Senior Manager, Air Quality
Operational Services | Environmental Services
T. 626-302-8850 | M. 626-609-9027
2244 Walnut Grove Ave, Rosemead, CA 91770



From: Heather Mackinnon <MacKinno@ClarkCountyNV.gov>
Sent: Tuesday, September 15, 2020 9:39 AM
To: Joy Brooks <joy.s.brooks@sce.com>
Subject: (External):SOUTHERN CALIFORNIA EDISON-ELM SERIES CAPACITOR PROJECT
Importance: High

CAUTION EXTERNAL EMAIL

Greetings,

Please **reply to this email only** as soon as possible so not to delay the approval process. I have reviewed your Dust Control Operating Permit application and have questions and/or need additional information. Applications cannot be updated with verbal authorization so **please reply to this email**. If you have questions, feel free to email me those inquiries.

Please supply Joy Brooks required cell phone number.

Please remove all the DAQ BMP's from your SMP. These are required and already included once the permit is issued.

A breakdown/justification of the total acreage of **61.5** acres must be submitted to show how the project acreage was calculated.

The map needs to clearly show areas to be permitted. Acreage must be identified for all project areas, stockpile locations & staging areas. Dimensions may not be required (unless the portion is LINEAR in which case the length and width of the disturbance must be given).

Regards,

Heather Mackinnon

Effective July 27, 2020 – New County wide business hours are M-TH, 7:30 – 5:30, closed on Fridays.

Air Quality Specialist II
Department of Environment and Sustainability
Air Quality Division – Enforcement Section
4701 W. Russell Road #200
Las Vegas NV 89118
Phone: (702) 455-1524 Fax: (702) 383-9994

You must use **INTERNET EXPLORER** as your search engine. If you have your default browser set to anything else, such as Chrome, the forms will not work.

For Dust Control Applications and Forms, click on this link: [DUST FORMS](#)

Best Management Practices (BMPs) & Control Measures

BMP 01

BACKFILLING

Definition: Filling area previously excavated or trenched.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize backfill material when not actively handling.

- 01-01 Water backfill material to maintain moisture or to form crust when not actively handling.
- 01-02 Apply and maintain a dust palliative to backfill material to form crust when not actively handling.
- 01-03 Cover or enclose backfill material when not actively handling.

Requirement: Stabilize backfill material during handling.

- 01-04 Empty loader bucket slowly and minimize drop height from loader bucket.
- 01-05 Dedicate water truck or large hose to backfilling equipment and apply water as needed.

Requirement: Stabilize backfill material during handling based on project soil type.

- 01-07 L & ML: Apply and mix water into the backfill material until optimum moisture is reached.
- 01-08 MH: Apply and mix water and tackifier solution into the backfill material until optimum moisture is reached.
- 01-09 H: Apply and mix water and surfactant solution into the backfill material until optimum moisture is reached.

Requirement: Stabilize soil at completion of backfilling activity.

- 01-10 Apply water and maintain disturbed soils in a stable condition until permanent stabilization is complete.
- 01-11 Apply and maintain a dust palliative on disturbed soils to form a crust following backfilling activity.

Requirement: Stabilize material while using pipe padder equipment.

- 01-12 Mix moist soil with dry soil until the optimum moisture is reached.
- 01-13 Dedicate water truck or large hose to equipment and apply water as needed.

Best Management Practices (BMPs) & Control Measures

BMP 02

BLASTING – ABRASTIVE

Definition: Sandblasting and/or abrasive blasting.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

02-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

02-02 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Limit visible emissions to no more than an average of 40% opacity for any period aggregating 3 minutes in any 60-minute period pursuant to Air Quality Regulations.

02-03 Hydro-blasting, using water as the propellant, must be conducted in a manner to maintain visible emissions within opacity standards.

02-04 Dry, unconfined blasting with abrasive material must use only those abrasives that are approved and certified by the California Air Resources Board (CARB) for such use (see Attachment 3: CARB-Approved Abrasives Information).

Requirement: Stabilize particulate matter in surrounding area following blasting.

02-05 Clean particulate material from surrounding area and water disturbed soils following blasting.

02-06 Apply and maintain a dust palliative to surrounding area following blasting.

Best Management Practices (BMPs) & Control Measures

BMP 03

BLASTING – SOIL & ROCK

Definition: Explosive blasting of soil and rock.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: A Blasting Supplemental form must be filled out, submitted and approved by the DAQEM prior to any blasting (see Appendix A: Dust Control Permit Supplemental Forms)

Requirement: No blasting within 1,500 feet of a residential area, occupied building or major roadway, when wind direction is toward these structures.

Requirement: Blasting shall be between the hours of 8:00 a.m. and 4:30 p.m., excluding Saturdays, Sundays and holidays unless prior permission is obtained from the Control Officer.

Requirement: No blasting allowed when the National Weather Service forecasts wind gusts above 25 miles per hour (mph).

03-01 Prior to setting explosive charges in holes, document current and predicted weather conditions as provided by the National Weather Service. If the current forecast is for wind gusts of 25 mph or greater or they are forecasted to be 25 mph or greater within the next 24 hours, do not charge any blast holes. When setting explosive charges, monitor weather reports for wind gusts of 25 mph or greater on the National Weather Service Radio and/or Internet sites. If wind gusts above 25 mph are stated, d

Requirement: Stabilize surface soils where drills, support equipment and vehicles will operate.

03-02 Pre-water and maintain surface soils in a stabilized condition where drills, support equipment and vehicles will operate.

03-03 Apply and maintain a dust palliative on surface soils where drills, support equipment and vehicles will operate.

Requirement: Stabilize soil during blast preparation activities.

03-04 Limit the blast footprint area to no larger than what can be practically stabilized immediately following the blast.

03-05 Maintain surface rock and vegetation where possible to reduce exposure of disturbed soil to wind.

Requirement: Stabilize soil during blast preparation activities based on project soil type.

03-06 L & ML: Presoak surface soils to depth of the caliche or bedrock with water using water trucks, water pulls, sprinklers or wobblers.

03-07 MH: Presoak surface soils to depth of the caliche or bedrock with water and tackifier mixture using water trucks, water pulls, sprinklers or wobblers.

03-08 H: Presoak surface soils to depth of the caliche or bedrock with water and surfactant mixture using water trucks, water pulls, sprinklers or wobblers.

Requirement: Stabilize soil after blasting.

03-09 Water disturbed soils to form crust immediately following blast and safety clearance. 03-10 Apply and maintain a dust palliative to form crust immediately following blast and safety clearance.

Best Management Practices (BMPs) & Control Measures

BMP 04

CLEARING & GRUBBING

Definition: Clearing and grubbing for site preparation and vacant land cleanup.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

04-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

04-02 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Stabilize soil during clearing and grubbing activities.

04-03 L & ML: Apply water during clearing and grubbing activities.

04-04 MH: Apply water and tackifier mixture during clearing and grubbing activities.

04-05 H: Apply water and surfactant mixture during clearing and grubbing activities.

Requirement: Stabilize disturbed soil immediately after clearing and grubbing activities.

04-06 Water disturbed soils to form crust immediately following clearing and grubbing activities.

04-07 Apply and maintain a dust palliative on disturbed soils to form crust immediately following clearing and grubbing activities.

Best Management Practices (BMPs) & Control Measures

BMP 05

CLEARING FORMS, FOUNDATIONS AND SLABS

Definition: Clearing and cleaning of forms, foundations and slabs prior to pouring concrete.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Limit visible emissions to no more than an average of 20% opacity for any period aggregating 3 minutes in any 60-minute period pursuant to Air Quality Regulations.

05-01 Use single stage pours, unless prohibited by engineering design or building code, to minimize clearing.

Requirement: Limit visible emissions to no more than an average of 20% opacity for any period aggregating 3 minutes in any 60-minute period by complying with at least one of the additional control measures.

05-02 Use water spray to clear forms, foundations and slabs.

05-03 Use sweeping and water spray to clear forms, foundations and slabs.

05-04 Use industrial vacuum to clear forms, foundations and slabs prior to the use of high pressure air to blow soil and debris.

05-05 Use industrial vacuum to clear forms, foundations and slabs.

Best Management Practices (BMPs) & Control Measures

BMP 06

CRUSHING

Definition: Crushing of construction and demolition debris, rock and soil.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Obtain the appropriate Operating Permit for powered crushers prior to engaging in crushing activity. Comply with permit conditions.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

06-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

06-02 Apply and maintain a dust palliative to surface soils where support equipment and vehicles will operate.

Requirement: Stabilize material before crushing.

06-03 Pre-water material prior to loading into crusher.

06-04 Test material to determine moisture content and silt loading, crush only material that is at optimum moisture content.

Requirement: Stabilize material during crushing.

06-05 Apply water to stabilize material so as to remain in compliance with opacity standards and permit conditions, during crushing.

06-06 Monitor emissions opacity. Make adjustments to remain in compliance with opacity standards and permit conditions.

Requirement: Stabilize material after crushing.

06-07 Water crushed material to form crust immediately following crushing. 06-08 Apply and maintain a dust palliative to crushed material.

Best Management Practices (BMPs) & Control Measures

BMP 07

CUT AND/OR FILL

Definition: Cut and/or fill soils for site grade preparation.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

07-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

07-02 Apply and maintain a dust palliative to surface soils where support equipment and vehicles will operate.

Requirement: Pre-water soils based on project soil type.

07-03 Dig a test hole to depth of cut or equipment penetration to determine if soils are moist at depth. Continue to pre-water if not moist to depth of cut.

07-04 L & ML: Pre-water with sprinklers or wobblers to allow time for penetration.

07-05 L & ML: Pre-water with water trucks or water pulls to allow time for penetration.

07-06 MH: Pre-water with a water and tackifier mixture using sprinklers or wobblers to allow time for penetration.

07-07 MH: Pre-water with a water and tackifier mixture using water trucks or water pulls to allow time for penetration.

07-08 H: Pre-water with a water and surfactant mixture using sprinklers or wobblers to allow time for penetration.

07-09 H: Pre-water with a water and surfactant mixture using water trucks or water pulls to allow time for penetration.

Requirement: Stabilize soil during cut activities.

07-10 Apply water, using water truck or water pull, to depth of cut prior to subsequent cuts.

07-11 No cut activities fill only.

Requirement: Stabilize soil after cut and fill activities.

07-12 Water disturbed soils to form crust following fill and compaction.

07-13 Apply and maintain a dust palliative on disturbed soils to form crust following fill and compaction.

Best Management Practices (BMPs) & Control Measures

BMP 08

DEMOLITION – IMPLOSION

Definition: Implosive demolition of a structure, using explosives.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: A Demolition Supplemental form (see Appendix A) and a Supplement To The Dust Mitigation Plan (see Appendix B) must be filled out, submitted and approved by the Control Officer prior to implosion.

Requirement: An asbestos survey must be conducted on any facility before demolition can commence.

Requirement: A complete Clark County NESHAP Notification form must be submitted to the DAQEM at least ten working days prior to demolition. The asbestos survey must be attached to this notification.

Requirement: All friable and non-friable asbestos containing material must be removed from the facility prior to implosion.

Requirement: Confine blasting to times when wind direction is away from closest residential areas, occupied buildings and major roadways.

Requirement: Implosion time must be pre-approved by the Control Officer.

Requirement: Monitor and document current weather conditions and weather predictions from National Weather Service.

08-01 Prior to setting explosive charges, obtain and document current and predicted weather conditions as provided by the National Weather Service. If wind advisory (over 20 miles per hour gusts or average wind speed of 10 miles per hour) is current or forecasted for blast period, do not set charges and do not blast. Maintain a calibrated anemometer and log ambient air velocity and direction within 1,000 feet of the implosion site, beginning at least 1 (one) hour prior to and 15 minutes after the implosion.

Requirement: Stabilize surface area where support equipment and vehicles will be operated.

08-02 Restrict support equipment and vehicles to existing paved and/or stable areas.

08-03 If paved and/or stable areas do not already exist, pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

08-04 If paved and/or stable areas do not already exist, apply and maintain a dust palliative on surface soils where support equipment and vehicles will be operated.

Requirement: Stabilize demolition debris immediately following blast and safety clearance.

08-05 Apply water to debris immediately following blast and safety clearance.

08-06 Apply and maintain a dust palliative to debris immediately following blast and safety clearance.

Requirement: Stabilize and clean surrounding area immediately following blast and safety clearance.

08-07 Water all disturbed soil surfaces to establish crust and prevent wind erosion of soil.

08-08 Thoroughly clean blast debris from paved and other surfaces following blast and safety clearance.

Best Management Practices (BMPs) & Control Measures

BMP 09

DEMOLITION – MECHANICAL/MANUAL

Definition: Mechanical and manual demolition of walls, stucco, concrete, freestanding structures, buildings, load-bearing walls and/or removal of transit pipe.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: For renovation or demolition of a structure, a Demolition Supplemental form (see Appendix A) must be filled out, submitted and approved by the Control Officer prior to commencing demolition.

Requirement: An asbestos survey must be conducted on any facility or structure that is subject to NESHAP requirements before demolition can commence.

Requirement: A complete Clark County NESHAPS Notification form must be submitted to the DAQEM at least ten working days prior to demolition. The asbestos survey must be attached to this notification.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

09-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

09-02 Apply and maintain a dust palliative to surface soils where support equipment and vehicles will operate.

09-03 Area where support equipment and vehicles will operate is completely covered with paving or concrete.

Requirement: Stabilize demolition debris during handling.

09-04 Apply water to demolition debris during handling.

Requirement: Stabilize debris following demolition.

09-05 Apply water to stabilize demolition debris.

09-06 Apply a dust palliative to stabilize demolition debris.

Requirement: Stabilize surrounding area following demolition.

09-07 Apply water to stabilize surrounding area following demolition.

09-08 Apply and maintain a dust palliative to stabilize surrounding area following demolition.

Best Management Practices (BMPs) & Control Measures

BMP 10

DISTURBED SOIL

Definition: Disturbed soil throughout project including between structures.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: For each non-linear project to be permitted for 5 acres or less; install perimeter wind barrier 3 feet or more in height made of material with a porosity of 50% or less.

Requirement: Limit vehicle traffic and disturbance of soils where possible.

10-01 Limit vehicle traffic and disturbance of soils with the use of fencing, barriers, barricades, and/or wind barriers.

Requirement: Stabilize and maintain stability of all disturbed soil throughout construction site.

10-02 Apply water to stabilize disturbed soils. Soils must be kept in a sufficiently damp, crusted or covered condition.

10-03 Apply and maintain a dust palliative based on soil type and future plans.

Requirement: Soil conditions, including preventive and corrective measures, must be recorded every day the construction project is active.

10-04 Record soil conditions and dust control actions in daily project records.

Best Management Practices (BMPs) & Control Measures

BMP 11

DISTURBED LAND – LONG TERM STABILIZATION

Definition: Large tracts of disturbed land that will not have continuing activity for more than 30 days.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize soil to meet standards required by Air Quality Regulation Section 90.

11-01 Apply and maintain a dust palliative on disturbed soils for long-term stabilization.

11-02 Stabilize disturbed soil with vegetation for long-term stabilization.

11-03 Pave or apply surface rock for long-term stabilization.

11-04 Use wind breaks in accordance with a site-specific plan approved by the Control Officer and Region IX Administrator of the EPA.

11-05 Apply water and maintain soils in a visible damp or crusted condition for temporary stabilization.

Requirement: Prevent access to limit soil disturbance.

11-06 Prevent access by fencing, ditches, vegetation, berms or other suitable barrier or means approved by the Control Officer.

Best Management Practices (BMPs) & Control Measures

BMP 12

DUST SUPPRESSANTS – SELECTION AND USE

Definition: Selection and use of chemical and organic dust suppressing agents and other dust palliatives.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Follow CCHD “Interim Policy on Dust Palliatives Use In Clark County, Nevada”.

Requirement: Record use of suppressants and dust palliatives and retain records. Requirement: Follow applicable federal and state regulations.

Requirement: Select method of long-term stabilization taking into consideration future land use.

12-01 For traffic area applications use Table 1: Traffic Area Application Requirements, Appropriate Use of Liquid Dust Palliatives and Application Rates, from the Interim Policy on Dust Palliatives Use in Clark County, Nevada.

12-02 For non-traffic area applications use Table 2: Non-Traffic Area Application Requirements, Appropriate Use of Liquid Dust Palliatives and Application Rates, from the Interim Policy on Dust Palliatives Use in Clark County, Nevada.

Best Management Practices (BMPs) & Control Measures

BMP 13

IMPORTING/EXPORTING MATERIALS

Definition: Importing or exporting of soil, aggregate, decorative rock, debris, Type II and other bulk material.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Limit visible dust opacity from vehicular operations.

13-01 Apply water and limit vehicle speeds to 15 mph on the work site.

13-02 Apply and maintain dust suppressant on haul routes.

Requirement: Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage.

Requirement: Maintain 3-6 inches of freeboard to minimize spillage. Requirement: Stabilize materials during transport on site.

13-03 Use tarps or other suitable enclosures on haul trucks.

13-04 Stabilize materials with water.

Requirement: Clean wheels and undercarriage of haul trucks prior to leaving construction site.

Best Management Practices (BMPs) & Control Measures

BMP 14

LANDSCAPING

Definition: Installation of sod, decorative rock, desert or other landscape material.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize soils, materials and slopes during handling.

14-01 L & ML: Apply water prior to leveling or any other earth moving activity to keep the soil moist throughout the process.

14-02 MH: Apply a water and tackifier mixture prior to leveling or any other earth moving activity to keep the soil moist throughout the process.

14-03 H: Apply a water and surfactant mixture prior to leveling or any other earth moving activity to keep the soil moist throughout the process.

Requirement: Stabilize soils, materials and slopes at completion of activity.

14-04 Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slope.

14-05 Apply water and maintain sloping surfaces in a crusted condition.

14-06 Maintain effective cover over materials.

Best Management Practices (BMPs) & Control Measures

BMP 15

PAVING/SUBGRADE PREPARATION

Definition: Subgrade preparation for paving streets, parking lots, etc.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize soils prior to activities.

15-01 Pre-water subgrade surface until optimum moisture content is reached and maintained.

Requirement: Stabilize soils during activities.

15-02 Maintain at least 70% of optimum moisture content for Type II material while aggregate is being applied.

Requirement: Stabilize soils following activities.

15-03 Place tack coat on Type II aggregate base immediately after it is applied.

15-04 Apply water to Type II aggregate base immediately after it is applied.

Requirement: Stabilize adjacent disturbed soils following paving activities.

15-05 Stabilize adjacent disturbed soils following paving activities by crusting with water.

15-06 Stabilize adjacent disturbed soils following paving activities by applying a dust palliative.

15-07 Stabilize adjacent disturbed soils following paving activities with immediate landscaping activity or installation of vegetative or rock cover.

15-08 There are no soils adjacent to paving activities.

Best Management Practices (BMPs) & Control Measures

BMP 16

SAWING/CUTTING MATERIAL

Definition: Sawing or cutting materials such as concrete, asphalt, block or pipe.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Limit visible emissions to no more than an average of 20% opacity, pursuant to Air Quality Regulations.

16-01 Use water to control dust when cutting materials.

16-02 Use a vacuum to collect dust when cutting materials.

Best Management Practices (BMPs) & Control Measures

BMP 17

SCREENING

Definition: Screening of rock, soil or construction debris.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: If using a powered screen, obtain the appropriate Operating Permit for powered screens prior to engaging in screening activity. Comply with permit conditions.

Requirement: Drop material through the screen slowly and minimize drop height. Requirement: Stabilize surface soils where support equipment and vehicles will operate.

17-01 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

17-02 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Pre-treat material prior to screening.

17-03 Apply sufficient water to obtain at least 70% optimum moisture in material prior to screening.

17-04 Apply a dust suppressant to material prior to screening.

Requirement: Stabilize material during screening.

17-05 Dedicate water truck or large hose to screening operation and apply water as needed to prevent dust.

17-06 Apply water to material as it is being dropped through the screen.

17-07 Install wind barrier upwind of screen as high as the screen drop point and made of material with a porosity of 50% or less.

Requirement: Stabilize material and surrounding area immediately after screening.

17-08 Apply water to stabilize screened material and surrounding area after screening.

17-09 Apply and maintain a dust palliative to stabilize screened material and surrounding area after screening.

Best Management Practices (BMPs) & Control Measures

BMP 18

STAGING AREAS

Definition: Staging areas, equipment storage, vehicle parking lots, and material storage areas.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Limit visible dust opacity from vehicular operations.

- 18-01 Limit vehicle speeds to 15 mph in the staging area and on all unpaved access routes.
- 18-02 Apply and maintain dust suppressant on all vehicle traffic areas in the staging areas and unpaved access routes.

Requirement: Stabilize staging area soils during use.

- 18-03 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.
- 18-04 Apply and maintain a dust palliative to surface soils where support equipment and vehicles will be operated.

Requirement: Stabilize staging area soils at project completion.

- 18-05 Apply a dust palliative.
- 18-06 Apply screened or washed Type II aggregate.
- 18-07 Use wind breaks in accordance with a site-specific plan approved by the Control Officer and Region IX Administrator of the EPA.
- 18-08 Pave with thin paving.
- 18-09 Completed project will cover staging area with buildings, paving, and/or landscaping.
- 18-10 Apply water to form adequate crust and prevent access.

Best Management Practices (BMPs) & Control Measures

BMP 19

STOCKPILES

Definition: Stockpiling of materials, such as Type II, other soils, rock or debris, for future use or export.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: To the extent possible, maintain stockpile to avoid steep sides or faces.

Requirement: Stockpile location and height must be maintained pursuant to Air Quality Regulations. Stockpiles located within 100 yards of occupied buildings must not be constructed over 8 feet in height.

19-01 Stockpiles will not be constructed over 8 feet in height.

19-02 Stockpiles will be constructed over 8 feet high and must have a road bladed to the top to allow water truck access or must have a sprinkler irrigation system installed, used and maintained.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

19-03 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.

19-04 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Stabilize stockpile materials during handling.

19-05 Maintain stockpile materials with at least 70% optimum moisture content.

19-06 Remove material from the downwind side of the stockpile, when safe to do so.

Requirement: Stabilize stockpile materials during handling based on the project soil type.

19-07 L & ML: Apply water during stacking, loading and unloading operations.

19-08 MH: Apply a water and tackifier mixture during stacking, loading and unloading operations.

19-09 H: Apply a water and surfactant mixture during stacking, loading and unloading operations.

Requirement: Stabilize stockpiles at completion of activity.

19-10 Water stockpiles to form a crust immediately at the completion of activity.

19-11 Apply and maintain a dust palliative to all outer surfaces of the stockpiles.

19-12 Provide and maintain wind barriers on 3 sides of the pile, whose length is no less than equal to the length of the pile, whose distance from the pile is no more than twice the height of the pile, whose height is equal to the pile height, and made of material with a porosity of 50% or less.

19-13 Apply a cover or screen to stockpiles.

Best Management Practices (BMPs) & Control Measures

BMP 20

TRACKOUT PREVENTION AND CLEANUP

Definition: Prevention and cleanup of mud, silt and soil tracked out onto paved roads.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: In soils that have a PEP classification of “High”, pave construction activities roadways as early as possible.

Requirement: Use of soil to create a ramp for vehicle access over a curb is prohibited.

Requirement: Trackout conditions, including preventive and corrective measures, must be recorded daily for every day that the construction project access is used by vehicles.

20-01 Record soil conditions and dust control actions in daily project records.

Requirement: Prevent dust from trackout.

20-02 Immediately clean trackout from paved surfaces to maintain dust control. Trackout must not extend 50 feet or more.

20-03 Maintain dust control during working hours and clean trackout from paved surfaces at the end of the work shift/day. Trackout must not extend 50 feet or more and must be cleaned daily, at minimum.

Requirement: Install and maintain trackout control devices in effective condition at all access points where paved and unpaved access or travel routes intersect.

20-04 Install gravel pad(s) consisting of 1” to 3” rough diameter, clean, wellgraded gravel or crushed rock. Minimum dimensions must be 30 feet wide by 3 inches deep, and, at minimum, 50’ or the length of the longest haul truck, whichever is greater. Re- screen, wash or apply additional rock in gravel pad to maintain effectiveness.

20-05 Install wheel shakers. Clean wheel shakers on a regular basis to maintain effectiveness.

20-06 Install wheel washers. Maintain wheel washers on a regular basis to maintain effectiveness.

20-07 Install wheel shakers in the event that trackout cannot be controlled with gravel pads.

20-08 Install wheel washer in the event that trackout cannot be controlled with gravel pads and wheel shakers.

20-09 Motorized vehicles will only operate on paved surfaces.

Requirement: All exiting traffic must be routed over selected trackout control device(s).

20-10 Clearly establish and enforce traffic patterns to route traffic over selected trackout control device(s).

20-11 Limit site accessibility to routes with trackout control devices in place by installing effective barriers on unprotected routes.

Best Management Practices (BMPs) & Control Measures

BMP 21

TRAFFIC – UNPAVED ROUTES AND PARKING

Definition: Construction related traffic on unpaved interior and/or access roads and unpaved employee/worker parking areas.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Limit visible dust opacity from vehicular operations.

- 21-01 Limit vehicle speeds to 15 mph on all unpaved routes and parking areas.
- 21-02 Apply and maintain dust palliative on all vehicle travel areas.

Requirement: Stabilize all haul routes.

- 21-03 Apply water to haul routes and maintain in a stabilized condition.
- 21-04 Apply a dust palliative to haul routes and maintain in a stabilized condition.
- 21-05 Apply gravel to haul routes and maintain in a stabilized condition.
- 21-06 Supplement dust palliative or aggregate applications with watering, if necessary.

Requirement: Stabilize all off-road and parking areas.

- 21-07 Apply water to off-road traffic and parking areas and maintain in a stabilized condition.
- 21-08 Apply gravel to off-road traffic and parking areas and maintain in a stabilized condition.
- 21-09 Apply recycled asphalt (or other suitable material) to off-road traffic and parking areas and maintain in a stabilized condition.
- 21-10 Apply and maintain a dust palliative (designed for vehicle traffic) to off-road traffic and parking areas and maintain in a stabilized condition.

Best Management Practices (BMPs) & Control Measures

BMP 22

TRENCHING

Definition: Trenching with track or wheel mounted excavator, shovel, backhoe or trencher.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Stabilize surface soils where trenching equipment, support equipment and vehicles will operate.

22-01 Pre-water and maintain surface soils in a stabilized condition where trenching equipment, support equipment and vehicles will operate.

22-02 Apply and maintain a dust palliative to surface soils where trenching equipment, support equipment and vehicles will operate.

Requirement: Presoak soils prior to trenching activities based on the project soil type.

22-03 Pre-water surface, pre-trench to 18" depth, soak soils via pre-trench prior to deep trenching.

22-04 L & ML: Presoak soil with water using sprinklers or wobblers.

22-05 L & ML: Presoak with water, using water truck and/or water pull.

22-06 MH: Presoak soil with a water and tackifier mixture using water pulls and/or water trucks.

22-07 MH: Presoak soil with a water and tackifier mixture using sprinklers or wobblers.

22-08 H: Presoak soil with a water and surfactant mixture using water pulls and/or water trucks.

22-09 H: Presoak soil with a water and surfactant mixture using sprinklers or wobblers.

Requirement: Stabilize soil during trenching activities based on the project soil type.

22-10 L & ML: Complete trenching with a dedicated water truck or large hose maintaining water as needed to prevent dust.

22-11 L & ML: Use spray nozzles mounted on trenching machine.

22-12 MH: Complete trenching with a dedicated water truck or large hose maintaining a water and tackifier mixture as needed to prevent dust.

22-13 H: Complete trenching with a dedicated water truck or large hose maintaining a water and surfactant mixture as needed to prevent dust.

Requirement: Stabilize soils at the completion of trenching activities.

22-14 Use water to form crust on excavated soil windrow as it is formed.

22-15 Use dust palliative to form crust on excavated soil windrow as it is formed.

Best Management Practices (BMPs) & Control Measures

BMP 23

TRUCK LOADING

Definition: Loading trucks with materials including construction and demolition debris, rock and soil.

PEP/Soil Type: L (Low), ML (Moderate Low), MH (Moderate High) & H (High).

The permittee shall comply with all applicable requirements for activities performed pursuant to this Dust Control Operating Permit (DCOP). If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measure for the designated PEP/Soil Type.

Requirement: Ensure all loads are covered prior to leaving the construction site and traveling on public roadways.

Requirement: Stabilize surface soils where loaders, support equipment and vehicles will operate.

23-01 Pre-water and maintain surface soils in a stabilized condition where loaders, support equipment and vehicles will operate.

23-02 Apply and maintain a dust palliative on surface soils where loaders, support equipment and vehicles will operate.

Requirement: Stabilize material during loading.

23-03 Empty loader bucket slowly and keep loader bucket close to the truck to minimize the drop height while dumping.

Requirement: Stabilize material during loading based on the project soil type.

23-04 L & ML: Mix material with water prior to loading.

23-05 L & ML: Spray material with water while loading.

23-06 MH: Mix material with a water and tackifier mixture prior to loading.

23-07 MH: Spray material with a water and tackifier mixture while loading.

23-08 H: Mix material with a water and surfactant mixture prior to loading.

23-09 H: Spray material with a water and surfactant mixture while loading.