Dust Control Management Plan

Sycamore to Peñasquitos 230kV Transmission Line Project

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1.0 INTRODUCTION

The Dust Control Management Plan (Plan) provides the measures to be implemented by San Diego Gas & Electric Company (SDG&E) and its contractors to minimize fugitive dust emissions during construction of the Sycamore to Peñasquitos 230 kilovolt (kV) Transmission Line (Project). The Plan has been prepared in compliance with Mitigation Measure (MM) Air-3: Dust Control Management Plan, MM Hydrology-2 Restrict Dust Control Water Usage, and Applicant Proposed Measure (APM) AIR-1: Fugitive Dust Control from the Final Environmental Impact Report (FEIR) and as described in the Project's Mitigation Monitoring Compliance and Reporting Plan (MMCRP), as well as San Diego Air Pollution Control District (SDAPCD) Rules 50 and 55.

The Project proposes the construction and operation of a 230 kV transmission line between the existing Sycamore Canyon and Peñasquitos Substations. The project route consists of approximately 14-miles traversing through developed residential and commercial areas as well as undeveloped areas and includes the following components:

- Segment A - Construction of approximately 0.74 mile of new 230 kV transmission line and relocated 138 kV power line on new tubular steel poles (mono-pole structures) and steel H-frame structures all within existing SDG&E Right-of-Way (ROW) located between the existing Sycamore Canyon Substation and a trail originating at Stonebridge Parkway. Construction of one new cable pole at the transition point from overhead to underground.
- Segment B - Construction of approximately 11.45 miles of 230 kV underground transmission line in existing roads and bridges.
- Segment C - Install approximately 2.2 miles of new 230 kV transmission line and all-dielectric self-supporting (ADSS) communication cable on existing 230 kV tubular steel poles within existing SDG&E ROW from Scranton Road to Peñasquitos Substation. Construction of one new cable pole at the transition point from underground to overhead.
- Minor modifications of the existing Sycamore Canyon and Peñasquitos Substations to allow for connection of the new 230 kV transmission line.

2.0 OBJECTIVES

The purpose of this Plan is to provide a description of measures that will be implemented to reduce fugitive dust emissions during construction of the Project.

This Plan provides specific information for complying with MM Air-3: Dust Control Management Plan, APM AIR-1: Fugitive Dust Control, MM Hydrology-2 Restrict Dust Control Water Usage and SDAPCD Rules 50 and 55.

3.0 APPLICABLE DUST CONTROL REQUIREMENTS

Mitigation Measure AIR-3: Dust Control Management Plan reads:

SDG&E shall submit a Dust Control Management Plan to the CPUC for review and approval no less than 30 days prior to construction. The Dust Control Management Plan shall contain measures that provide for conformance to SDAPCD Rule 55 requirements including:

1. *No person shall engage in construction or demolition activity in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period; and*
2. *Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall:*
    - *i. Be minimized by the use of any of the following or equally effective trackout/ carry-out and erosion control measures that apply to the project or operation: track-out gates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; and for outbound transport trucks: using secured tarps or cargo covering, watering, or treating of transported material; and*
    - *ii. Be removed at the conclusion of each work day when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any track-out/carry out, only PM_{10}-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.*

Measures to comply with visible dust emissions restrictions could include:

- *Watering or applying soil stabilizers to areas with loose dust*
- *Ceasing earthmoving activities when sustained (i.e., a period or periods of time aggregating more than 3 minutes in any 60-minute period) wind speed exceeds 20 miles-per-hour*
- *Covering soil stockpiles*

Applicant Proposed Measure AIR-1: Fugitive Dust Control reads:

- *All unpaved demolition and construction areas shall be wet/ watered at least three times daily during construction, and temporary dust covers shall be used to reduce dust emissions and meet SDAPCD Rule 55 requirements.*

- *All construction areas shall be sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable dust control of areas subject to windblown erosion.*
- *All loads shall be secured by covering or use of at least 2 feet of freeboard to avoid carry-over.*
- *All materials transported off-site shall be either sufficiently watered or securely covered.*
- *All earthmoving or excavation activities shall be discontinued during periods of winds greater than 25 miles-per-hour (mph) to prevent excessive amounts of fugitive dust generation.*

Mitigation Measure Hydrology-2: Restrict Dust Control Water Usage reads**:**

Water shall only be applied under APM Air-1 to maintain moist soils. No water shall be applied during or immediately following rain events when soils are already damp. Dust control water shall be applied in a manner that does not create or contribute to runoff.

San Diego Air Pollution Control District Rules

SDAPCD Rule 50 prohibits any activity that will create air contaminant emissions darker than 20-percent opacity for more than an aggregate of three minutes in any 60-minuite period.

SDAPCD Rule 55 Fugitive Dust Control prohibits the discharge of visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period during construction or demolition activities. The rule also requires the control and removal of visible roadway dust resulting from active operations, spillage from transport trucks, erosion, or track-out/carry-out.

4.0 PLAN IMPLEMENTATION

SDG&E will employ a variety of best management practices (BMPs) during construction to reduce the potential for fugitive dust emissions and maintain compliance with the above-referenced MMs, APMs, and SDAPCD Rules. These practices are described in further detail under each section heading below.

4.1 TRACK-OUT CONTROLS

Fugitive dust can be generated from soil and debris being tracked out onto paved surfaces and then subsequent detachment by local traffic or wind. SDG&E will minimize track-out by installing track-out plates, gravel aprons or similar control devices at all intersections of unpaved project areas and existing paved roadways being used during construction including staging yard entrances.

Streets will be swept at the conclusion of each workday when active operations cease if visible soil material is carried onto adjacent public streets. In accordance with SDAPCD Regulation IV, Rule 55(d)(2)(ii), only street sweepers with inhalable particulate matter (PM_{10}) efficiency and certified to meet the most current SCAQMD Rule 1186 requirements will be used. Blowers will

not be used to remove track-out/carry-out. Manual sweeping will also be employed as an acceptable method for removing soil and debris from pavement.

4.2 WATER TRUCKS

Water trucks, tenders or buffalos or other equipment (e.g., water spray system attached to drills or rock saws) will be utilized to apply water to unpaved construction areas during construction unless existing conditions are sufficiently wet to prevent dust (e.g., during or immediately following a rain event). Water will be applied prior to, during, and after earthmoving operations and vegetation clearing as necessary to reduce fugitive emissions. In all cases, water will be applied evenly and in a manner that does not generate runoff. Water will be applied as necessary to assure that construction and demolition activities will not discharge visible dust into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60- minute period. Alternatively, work may be slowed down or temporarily ceased.

Water trucks and related equipment will be dedicated to the Project and available during all work hours when construction-related activities are occurring.

4.3 MATERIAL STORAGE AND HANDLING

SDG&E will not handle or store material in a manner that results in excessive generation of dust. Soil stockpiles maintained as a part of the Project will be sufficiently watered or stabilized to reduce fugitive dust. Soil stockpiles may be stabilized by wetting to form a crust or other treatment—such as covering, use of soil binders, chemical soil stabilizers, geotextiles, mulching, or hydroseeding.

Any Project-related person operating a vehicle on a paved and public roadway with a load of dirt, sand, gravel, or other loose material—which may be susceptible to generate dust—will cover the load, or maintain two feet or more of freeboard during transportation on a paved or public roadway.

4.4 WIND EVENTS

All grading and excavation activities shall cease during periods of sustained wind events. These events are defined as wind exceeding 20 mph for a duration aggregating more than 3 minutes in any 60-minute period. A sustained wind event will be measured by monitoring the most proximate National Weather Service monitoring station or by using a kestrel wind meter or similar device. In the event that operations are shut down as a control method during a high wind event, watering of the area will continue if appropriate to minimize fugitive dust from crossing the property line. Wind speeds will continue to be monitored and construction activities will resume when wind speeds fall below the 20 mph 3-minute aggregate period in any 60-minute period and when visible dust emissions can be adequately controlled.

4.5 CHEMICAL SOIL STABILIZERS

Dust control during construction will be achieved primarily through the application of water, but in some instances and/or locations, the limited use of a chemical soil stabilizer may be used. Chemical soil stabilizers may be applied in lieu of water to form and maintain a crust on inactive

construction areas. Chemical soil stabilizers will be environmentally safe; comply with federal, state, and local regulations; and will not produce a noxious odor or contaminate surface water or groundwater. Chemical soil stabilizers will only be used if other erosion and sediment control devices are ineffective at keeping sediment within the Project limits. Application rates for chemical soil stabilizers will follow the manufacturer's recommendations.

4.6 SPEED LIMITS

The speed limit of 15 mph for construction vehicles will be implemented on unpaved non-public roads, within the right-of-way and in construction yards. SDG&E will implement the Project speed limit by posting speed limit signs and the speed limit will be discussed in the tailboard meetings and presented in the Project's Safety and Environmental Awareness Program. Construction activities may also be slowed down (e.g. reducing the speeds of grading equipment) to reduce fugitive dust emissions.

4.7 MONITORING AND REPORTING

During construction, SDG&E's construction contractor will be responsible for implementing the requirements of the Plan. SDG&E's compliance monitoring team will monitor construction activities to verify that the dust control measures and BMPs detailed in this Plan are being implemented as required to control fugitive dust emissions in accordance with the MMCRP and SDAPCD rules. Compliance observations will be reported on a regular basis along with other reporting requirements as noted in the MMCRP. Non-compliance events and responses to non-compliance events, as well as complaints and responses to complaints will be reported as part of regular compliance reporting.

5.0 REFERENCES

California Public Utilities Commission. 2016. Sycamore to Peñasquitos 230-KV Transmission Line Project Final Environmental Impact Report. March 2016.

San Diego Air Pollution Control District Regulation IV. Prohibitions, Rule 50. Visible Emissions (Rev. Effective 8/13/97). http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rtcref/ch2.2/2014-12-19_SDAPCD1997.pdf

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South Coast Air Quality Management District. Rule 1186 – PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations. July 11, 2008. http://www.aqmd.gov/home/regulations/rules/scaqmd-rule-book/regulation-xi