Appendix U

DUST CONTROL PLAN

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Easley Renewable Energy Project

Prepared for

Intersect Power

IP Easley, LLC

a subsidiary of Intersect Power, LLC

Submitted by

Aspen environmental group

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1. INTRODUCTION

IP Easley, LLC (Applicant or Proponent), a subsidiary of Intersect Power, LLC, proposes to construct, operate, maintain, and decommission an up to 650-megawatt (MW) solar photovoltaic (PV) electricity generating station, battery energy storage facility, electrical substation, generation intertie (gen-tie) line and associated access roads on approximately 3,735 acres of private and Bureau of Land Management (BLM) managed land in Riverside County, California near Desert Center. A proposed 6.7-mile 500 kilovolt (kV) generation-tie (gen-tie) line would interconnect to the Oberon Substation, which is under construction on the adjacent Oberon Renewable Energy Project site and is anticipated to be online by the end of 2023.

Construction for the Easley Project would occur over approximately 24 months. The Project would operate for a minimum of 35 years and up to 50 or more years. At the end of the project's useful life, the project would be decommissioned, and the land returned to its pre-project conditions.

The solar facility, battery energy storage system (BESS), on-site substation, and gen-tie line are collectively referred to as the Easley Renewable Energy Project (Project) throughout this report.

2. PROJECT LOCATION

The Easley Project is located in Riverside County, north of I-10 and approximately 2 miles north of the town of Desert Center, California. A generation-tie (gen-tie) line would mainly traverse across the Oberon Renewable Energy Project site and connect into an approved substation that is under construction on the approved Oberon Project site. From the Oberon Substation, energy generated by the Easley Project would be transmitted to the SCE Red Bluff Substation on the existing, approved Oberon 500 kV gen-tie line. The Project site is located on four 7.5 Minute U.S. Geological Survey topographic quadrangles: East of Victory Pass, Victory Pass, Desert Center, and Corn Springs.

The public lands within the Project solar application area are designated as Development Focus Area (DFA) by the Desert Renewable Energy Conservation Plan (DRECP) and associated Record of Decision (ROD), and thus, have been targeted for renewable energy development. Because the proposed Project is partially located on federal land under management of the U.S. Bureau of Land Management (BLM), the BLM is the lead agency under the National Environmental Policy Act (NEPA), 42 U.S.C. section 4321 et seq. Riverside County is lead agency under the California Environmental Quality Act (CEQA).

3. PROJECT COMPONENTS OVERVIEW

The proposed solar facility would consist of PV panels that would be minimally reflective, dark in color, and highly absorptive. The facility would include several million solar panels; the precise panel count would depend on the technology ultimately selected at the time of procurement. Panels would be arranged on the site in solar arrays with a similar level of ground disturbance for either single-axis or fixed-tilt tracking systems. A Project substation yard would transform or "step up" the voltage from 34.5 kV to 500 kV located adjacent to the battery energy storage system facility in the southeastern Project area.

A new O&M building would be constructed at the Project site. The facility would be designed for Project security, employee offices, and parts storage. The O&M building would be approximately 3,000 square feet in size and approximately 15 feet at its tallest point, which would accommodate operations and maintenance staff.

The 500 kV gen-tie line would be constructed with either monopoles, lattice steel structures, or wooden H-frame poles. Gen-tie structures would be on average 120 feet tall, with a maximum height up to 199 feet for

dead-end structures near the Red Bluff Substation. The gen-tie line would be located within one 175-foot ROW, running approximately 6.7 miles from the solar facility, across BLM-administered land, to the SCE Red Bluff Substation.

Construction, including automated construction techniques, would occur between the hours of 4:00 a.m. and 8:00 p.m. Monday through Friday for up to a maximum of 16 hours per day. During summer months, construction would begin early to minimize work during the hottest periods of the day. Likewise, limited, targeted night work may also be required by the interconnecting utility or for similar electrical work. Weekend construction work is not expected to be required on a regular basis, but may occur on occasion, depending on scheduling considerations.

A variety of off-road equipment (dozers with blade, excavators, mulchers, pile drivers, etc.) and on-road vehicles (heavy-duty trucks to deliver equipment, concrete, water, and other materials) would be utilized during construction. Light-duty vehicles carrying crews and medium-duty delivery vehicles would also be used. Construction would proceed as follows with the schedule to be updated following Project approval:

- Staking of Project work areas.
- Construction would commence with the installation of desert tortoise (DETO) fencing, if required. Limited vegetation clearing of the DETO fence alignment would be required prior to installation. Subsequent to the completion of fencing, clearance surveys will be conducted by qualified biologists to ensure that all DETO within the fenced areas are identified and relocated out of harm's way.
- After DETO fenced areas are cleared of DETO and BLM issues the Full Notice to Proceed, vegetation within fenced areas would be mowed or cleared depending on topography. Limited grading would also occur where necessary. Concurrently, roadways and staging/laydown areas would be improved.
- After lands within the fenced areas are prepared for panel installation, pilings would be installed followed by tracker and then solar panel installation.
- Concurrent with solar panel installation, the work areas and access roads for gen-tie tower installation would be prepared, followed by tower installation including foundations, and eventual conductor stringing. The substation and battery energy storage system would also be constructed, including site preparation, foundation installation, and finally equipment installation.
- After the completion of construction, all construction areas would be restored.

4. PLAN PURPOSE

The objective of the Fugitive Dust Control Plan (Plan) is to address fugitive dust emissions during Project construction and to detail practices designed to minimize the dust emissions that result from construction of the Easley Renewable Energy Project. The Fugitive Dust Control Plan has been developed in accordance with Rule 403 of the South Coast Air Quality Management District (SCAQMD) and will be addressed in future mitigation measures. Rule 403(d)(1) specifies that the purpose of dust minimization goals are to:

- Prevent visible fugitive dust from any active operation, open storage pile, or disturbed surface area from crossing the property line of the project; and
- Prevent fugitive dust caused by movement of a motorized vehicle from exceeding 20% opacity.

Based on approved solar facilities in the Desert Center area, mitigation measures to address fugitive dust could include:

- During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a

non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than Air Resources Board–approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor reactive organic gas (ROG) or volatile organic compound (VOC).

- For long-term site operations, maintenance, and decommissioning, the Project Owner shall establish a Site Operations Dust Control Plan, which includes all applicable fugitive dust control measures identified for operations activities. The Site Operations Dust Control Plan shall include the use of durable non-toxic soil stabilizers on all regularly used unpaved roads, shall restrict vehicular access to established unpaved travel paths within the Project boundaries, and shall include the long-term inspection and maintenance procedures that will be undertaken to ensure that the unpaved roads remain stabilized.
- The main access roads through the site shall be either paved or stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to initiating construction. Delivery, laydown, and staging areas for construction or Operations & Maintenance (O&M) supplies shall be paved or treated prior to taking initial deliveries.
- Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed area on any single day.
- No vehicle shall exceed 15 miles per hour on unpaved areas within the construction site, with the exception that vehicles may travel up to 25 miles per hour on stabilized unpaved roads as long as such speeds do not create visible dust emissions.
- Visible speed limit signs shall be posted at the construction site entrances.
- All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.
- All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways.
- All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.
- At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities is visible on the paved public roadway.

5. DUST GENERATING ACTIVITIES

Construction of the solar PV panels, gen-tie lines, ancillary facilities, and associated traffic could directly generate fugitive dust, especially in areas cleared of vegetation. The following construction-related activities have been identified as having the potential for generating fugitive dust. Section 7 provides best available control measures to reduce fugitive dust generation.

- Preparation and vehicle and motorized equipment movement on unpaved access roads and staging areas;
- Site preparation including grubbing and clearing of vegetation, including weed abatement;
- Topsoil removal;
- Trench excavation, installation, and backfilling of underground utilities;
- Preparation and installation of fencing;
- Preparation and installation of solar panels;

- Preparation and installation of gen-tie line, including pull sites;
- Preparation of substation and BESS locations;
- Bulk material loading, hauling, and unloading;
- Use of material storage piles;
- Use of parking, staging, and storage areas; and
- Track-out onto paved roads.

It is the responsibility of all Project personnel to ensure identification of all sources of fugitive dust and to take every reasonable precaution to prevent all airborne fugitive dust plumes from leaving the Project site and to prevent visible particulate matter from being deposited upon public roadways.

6. ROLES AND RESPONSIBILITIES

The following describes the roles and responsibilities of key parties to be involved in all aspects of the Plan. A Dust Control Supervisor would be identified who is:

- Employed by or contracted with the property owner or developer.
- Will be on the site or available on-site within 30 minutes during working hours.
- Has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all SCAQMD Rule 403 requirements.
- Has completed the AQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class.

The Dust Control Supervisor would also:

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

The Dust Control Supervisor contact information is as follows:

- Name, Phone Number, Email address [TBD]

The Project contractor would use Environmental Monitors to monitor compliance with the Plan. The Environmental Monitors would be responsible for recording and reporting any incidents related to dust control.

7. FUGITIVE DUST SOURCES AND BEST AVAILABLE CONTROL MEASURES

Controlling fugitive dust sources would be accomplished through a range of Best Available Control Measures (BACMs) consistent with those specified by SCAQMD Rule 403, including the following:

- Reducing vehicle and equipment speeds on unpaved surfaces.
- Minimizing the amount of new exposed soil/surface disturbance.
- Periodic application of clean water as directed by the environmental monitors to exposed disturbed surface areas (application of water would be via water trucks) to control fugitive dust during construction.
- Cover open-bodied trucks transporting materials likely to become airborne.
- Remove earth or other materials that may become airborne promptly from paved roads.

The Environmental Monitor and Dust Control Supervisor would monitor construction to ensure that dust does not leave the work area and accumulate on adjacent dwellings or roadways.

Project-specific requirements to be incorporated into mitigation measures are listed below:

- Grading and earthwork activities, including vegetation removal, cut and fill movement, and soil compacting, shall be phased across the site to minimize the amount of exposed or disturbed area on any single day.
- During construction, all unpaved roads, disturbed areas (e.g., areas of scraping, excavation, backfilling, grading, and compacting), and loose materials generated during construction activities shall be stabilized with a non-toxic soil stabilizer or soil weighting agent or watered two times daily or as frequently as necessary to minimize fugitive dust generation. Non-water-based soil stabilizers shall be as efficient as or more efficient for fugitive dust control than Air Resources Board–approved soil stabilizers and shall not increase any other environmental impacts, including loss of vegetation, adverse odors, or emissions of ozone precursor reactive organic gas (ROG) or volatile organic compound (VOC).
- The main access roads through the site shall be stabilized using soil binders, or equivalent methods, to provide a stabilized surface that is similar for the purposes of dust control to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer, prior to initiating construction. Delivery, laydown, and staging areas for construction or Operations & Maintenance (O&M) supplies shall be paved or treated prior to taking initial deliveries.
- All paved roads within the construction site shall be swept daily or as needed (less during periods of precipitation) on days when construction activity occurs to prevent the accumulation of dirt and debris.
- No vehicle shall exceed 15 miles per hour on unpaved areas within the construction site, with the exception that vehicles may travel up to 25 miles per hour on paved or stabilized unpaved roads as long as such speeds do not create visible dust emissions. Note that these vehicle speeds could be restricted by other resource protection measures.
- Visible speed limit signs shall be posted at the construction site entrances.
- All construction equipment vehicle tires shall be inspected and washed as necessary to be cleaned free of dirt prior to entering paved roadways.
- All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways.
- At least the first 500 feet of any paved public roadway exiting the construction site or exiting other unpaved roads to access the construction site or staging areas shall be swept as needed when dirt or runoff resulting from the construction activities are visible on the paved public roadway.

SCAQMD Requirements for Large Operations (Rule 403 Amended June 3, 2005)

General

- The Operator will submit a fully executed Large Operation Notification (Form 403 N) to the SCAQMD within 7 days of qualifying as a large operation, include all required information with the notification, maintain daily records to document the specific dust control actions taken, install and maintain project signage with project contact signage that meets the minimum standards of the Rule 403 Implementation Handbook prior to initiating any earthmoving activities, and identify a Dust Control Supervisor.
- The operator will maintain the natural topography to the extent possible.
- The operator will follow a construction schedule that specifies the construction of parking lots, laydown areas, and paved roads first whenever feasible.

- The contractor will turn off equipment when it is not in use.
- Where feasible, mowing and rolling techniques will be used to maintain plant root systems for soil stabilization.

Use of Roads and Parking Areas

- The main vehicular access roads to the gen-tie line sites and solar facility will be stabilized with chemical or gravel sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion.
- Unless other limitations apply, traffic speeds on unpaved roads will be limited to 15 miles per hour with the exception that vehicles may travel up to 25 miles per hour on paved or stabilized unpaved roads as long as such speeds do not create visible dust emissions. Traffic speed signs will be displayed prominently at all site entrances and at egress point(s) from temporary staging and parking areas. Note that these vehicle speeds could be restricted by other resource protection measures.
- Traffic on unpaved roads will be restricted to established travel paths or haul routes and stabilized parking lots.
- The main vehicular access roads to the gen-tie line sites and solar facility will be maintained to eliminate track-out extending 25 feet or more in cumulative length onto paved roads from the point of origin from an active operation.
- All track-out from an active operation shall be removed at the conclusion of each workday or evening shift.
- One of the following measures to prevent track-out onto paved roads shall be installed for any active operation with a disturbed surface area of five or more acres, or with a daily import or export of 100 cubic yards or more of bulk material:
  - Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
  - Pave the surface extending at least 100 feet and at least 20 feet wide;
  - Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide; or,
  - Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.

Earth Moving Activities

- Pre-apply water to depth of proposed cuts; and Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction.
- When wind speeds exceed 20 miles per hour (mph), construction contractors will minimize new disturbance to the extent possible and/or mobilize additional water trucks to minimize fugitive dust from exposed surfaces.
- Graded site surfaces will be stabilized upon completion of grading when subsequent development is delayed or expected to be delayed more than 30 days, except when such a delay is due to precipitation that dampens the disturbed surface sufficiently to eliminate visible fugitive dust emissions.

Disturbed Surface Area

- Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
- When feasible, a water truck will be used to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize visible fugitive dust emissions.

- Disturbance areas will be minimized to the maximum extent feasible.
- For non-road or parking area earthen surfaces, surfaces will be stabilized by compaction, chemical, or other means sufficient to prohibit visible fugitive dust from wind erosion.

Removing and Hauling Soil, Sand, and Other Loss Materials

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

Other Unanticipated Sources

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

8. CONTINGENCY CONTROL MEASURES FOR LARGE OPERATIONS

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

Table 1. Contingency Control Measures for Large Operations

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

Source: SCAQMD Rule 403 Table 3.

9. LONG-TERM SITE OPERATIONS, MAINTENANCE, AND DECOMMISSIONING

During site operations, maintenance, and decommissioning, dust control measures will be implemented to minimize fugitive dust.

- The main access roads through the site shall stabilized using non-toxic soil binders, or equivalent methods, to provide a stabilized surface that is similar, for the purposes of dust control, to paving, that may or may not include a crushed rock (gravel or similar material with fines removed) top layer. Pavement at Project entrances might be applied to a distance up to 100 feet.
- Delivery, laydown, and staging areas for operations, maintenance, or decommissioning supplies shall be paved or treated prior to taking initial deliveries.
- All unpaved exits from the construction site shall be graveled or treated to prevent track-out onto public roadways.
- No vehicle shall exceed 15 miles per hour on unpaved areas within the site, with the exception that vehicles may travel up to 25 miles per hour on paved or stabilized unpaved roads as long as such speeds do not create visible dust emissions.
- During operations, the site manager will inspect any unpaved access roads treated with soil binders to ensure the treatment is effective in minimizing fugitive dust emissions every six months and reapply as needed.
- All construction and operational activities would comply with SCAQMD's Rule 402 and 403, which prevent nuisance and regulate fugitive dust emissions.