APPENDIX E
FRAMEWORK DUST CONTROL AND AIR QUALITY PLAN

TABLE OF CONTENTS

E1.0 INTRODUCTION 1

E2.0 PLAN PURPOSE 1

E3.0 PLAN UPDATES 1

E4.0 REGULATORY 1

E4.1 FEDERAL PERMITS 1
E4.2 STATE PERMITS 2
E4.3 LOCAL PERMITS 2

E5.0 AIR QUALITY AND DUST CONTROL 2

E6.0 DESIGN FEATURES AND BEST MANAGEMENT PRACTICES 3

ACRONYMS

Applicant	TransWest Express LLC, also TransWest
BLM	Bureau of Land Management
BMP	Best Management Practice
CFR	Code of Federal Regulations
COM Plan	Construction, Operation, and Maintenance Plan
CWA	Clean Water Act
DEIS	Draft Environmental Impact Statement
EPA	United States Environmental Protection Agency
FLPMA	Federal Land Policy and Management Act of 1976
mph	miles per hour
NDEP	Nevada Division of Environmental Protection
NPDES	National Pollutant Discharge Elimination System
NTP	Notice to Proceed
Plan	Dust Control and Air Quality Plan
POD	Plan of Development
Project	TransWest Express Transmission Project, also TWE Project
ROD	Record of Decision
ROW	right-of-way
SWPPP	Stormwater Pollution Prevention Plan
TransWest	TransWest Express LLC, also Applicant
TWE Project	TransWest Express Transmission Project, also Project
U.S.C.	United States Code
USACE	United States Army Corps of Engineers
WDEQ	Wyoming Department of Environmental Quality

E1.0 INTRODUCTION

This framework Dust Control and Air Quality Plan (Plan) to be implemented by TransWest Express LLC (TransWest or Applicant) and its Construction Contractor(s) addresses regulatory compliance, environmental concerns, mitigation recommendations, and monitoring. This Plan will be utilized for the construction of the TransWest Express Transmission Project (TWE Project or Project) to ensure impacts associated with construction activities are minimized as they relate to soil conservation and air quality.

E2.0 PLAN PURPOSE

This Plan provides measures to be utilized by TransWest and its Construction Contractor(s) to ensure protection of the soils and air quality that will be affected by the Project. This Plan is to be implemented during the construction, operation, and maintenance phases of the Project. These measures are intended to: 1) address soil erosion and sedimentation; and 2) minimize dust and air emissions from construction-related activities. This document provides direction for the detailed final Dust Control and Air Quality Plan to be developed by the Construction Contractor(s).

E3.0 PLAN UPDATES

This Plan will be updated for the Record of Decision (ROD) Plan of Development (POD) based on the selected Agency Preferred Alternative and preliminary engineering and design. Mitigation measures will also be updated if required. The Plan for the Notice to Proceed (NTP) POD will include updates as required based on final design and engineering. The Construction Contractor(s) will be responsible for preparing and implementing the final Plan in compliance with all local, state, and federal regulations pertaining to air quality.

E4.0 REGULATORY

Construction, operation, and maintenance activities for the Project are subject to various regulations designed to protect environmental resources and the public from erosion, dust, and other possible effects to air quality. The following federal, state and local permits and documents are required for preventing accelerated erosion and minimizing dust and air emissions. These documents should be referred to along with this Plan, when assessing which mitigation measures are appropriate for a specific area. At a minimum, TransWest and the Construction Contractor(s) will need to adhere to or obtain the following permits, as applicable:

E4.1 Federal Permits

- BLM – Right-of-way (ROW) grant and temporary use permit: Federal Land Policy and Management Act of 1976 (FLPMA) (Public Law 94-579); 43 United States Code (U.S.C.) §§1761-1771; 43 Code of Federal Regulations (CFR) Part 2800

- U.S. Forest Service (USFS) special use authorization or easement: 36 CFR Part 251

- U.S. Army Corps of Engineers (USACE) – Clean Water Act (CWA), Section 401: CWA (33 U.S.C. §1344)

- U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Construction General Permit

E4.2 State Permits

- Wyoming Department of Environmental Quality (WDEQ) – Air Quality Division Construction Permit to control fugitive dust emissions during construction.

- WDEQ – Sections 401, 402, and 404, CWA, Water Quality Certification (State implementation of the USACE permits for water quality and stormwater discharges).

- Colorado Department of Public Health and Environment, Water Quality Control Division- Stormwater Permit.

- Utah Department of Environmental Quality, Air Quality Board- Notice of Construction.

- Nevada Division of Environmental Protection (NDEP) - Stormwater Pollution Prevention Plan (SWPPP), Water Quality Certification.

- NDEP Bureau of Air Pollution Control - Authority to construct, permit to operate.

E4.3 Local Permits

- Clark County, Department of Air Quality and Environmental Management - Dust Control Permit, Stationary Source Permit.

- County conditional use permits, temporary use permits for staging areas, road crossing permits and/or encroachment permits. May have erosion or air quality considerations. Requirements vary by county.

E5.0 AIR QUALITY AND DUST CONTROL

Soil conservation for the Project includes minimizing impacts that will affect soils from the construction and operation of the Project, such as minimizing wind and water erosion, surface disturbance, and construction activities in highly erodible soils. Erosion potential is the result of several factors including slope, vegetation cover, climate, and the physical and chemical characteristics of the soil. Increased soil erosion may occur when vegetation is removed during construction, or in areas where the surface is disturbed by heavy equipment. Wind is also an erosion factor throughout portions of the Project area.

Where disturbance is anticipated in areas of steep terrain with high potential for erosion, vegetation clearing and grading will be conducted in a manner to minimize these effects. Soil stabilization and reclamation practices will also be implemented to reduce erosion. In areas of soil disturbance or compaction (e.g., temporary work areas) soil treatment and reclamation will be implemented as directed in Appendix Q –Framework Reclamation Plan.

Construction of the Project may temporarily increase fugitive dust particularly in areas with high winds and fragile soils. Ambient levels of nitrogen oxides, hydrocarbons, and carbon monoxide near the construction zone may also be temporarily increased due to emissions from heavy construction equipment. Related facilities may cause a minimal increase in fugitive dust.

Air quality control measures are intended to minimize fugitive dust and air emissions, and to maintain conditions as free from air pollution where practical. All requirements of those entities having jurisdiction over air quality matters will be adhered to, and any permits needed for construction activities will be obtained. The Construction Contractor(s) will not proceed with any construction activities without taking

reasonable precautions to prevent excessive particulate matter from becoming airborne and creating nuisance conditions.

Excessive exhaust emissions from vehicles and heavy equipment will be prevented by proper maintenance, and no open burning of construction trash or other open fires will be allowed.

Where necessary, water may be used as Bureau of Land Management (BLM) approved dust control methods during construction, including the grading of roads or the clearing of vegetation in the ROW, and will be applied on unpaved roads, material stockpiles, and other surfaces, which can create airborne dust. Where application of water is not possible, material stockpiles will be enclosed or covered. In addition, open bodied trucks transporting materials likely to become airborne will be covered. Soil tracks or other materials that may become airborne will promptly be removed from paved roads. Techniques to minimize and control dust during rock blasting operations can be found in Appendix C – Blasting Plan Framework.

E6.0 DESIGN FEATURES AND BEST MANAGEMENT PRACTICES

In addition to applicable design and operational standards, regulations, laws and permit requirements, the following design features and Best Management Practices (BMPs) have been identified to avoid or minimize potential air quality related impacts. Note that the Construction, Operation and Maintenance Plan will be a part of the NTP POD.

TWE-21: The Applicant will obtain an NPDES from the USEPA prior to construction.

TWE-47: The Construction, Operation and Maintenance (COM) Plan will include a Dust Control and Air Quality Plan. Requirements of those entities having jurisdiction over air quality matters include ensuring the regulations are adhered to and dust control measures will be developed. Open burning of construction trash will not be allowed unless permitted by appropriate authorities.

TWE-48: The contractor and subcontractors will be required to have and use air emission control devices on construction machinery, as required by federal, state and local regulations or ordinances.

TWE-53: The COM Plan will include a Blasting Plan, which will identify methods and mitigation measures to minimize the effects of blasting, where applicable. The Blasting Plan will document the proposed methods to achieve the desired excavations; proposed methods for blasting warning; use of non-electrical blasting systems; and provisions for controlling fly rock, vibrations, and air blast damage.

Additional BMPs and Mitigation Measures identified in the Draft Environmental Impact Statement (DEIS) are listed below. The identified BMPs and Mitigation Measures have not been finalized at this time and may be updated, changed, or eliminated in future revisions of this Plan.

SS-7: The Dust Control and Air Quality Plan will include dust abatement measures to minimize impacts to special status plant species. This includes slower speed limits on unpaved roads, using gravel for roads in occupied habitat and avoidance areas, and the application of water for dust abatement.

SSS-1: (Water Use): No new surface water or groundwater withdrawals that are hydrologically connected to streams containing Colorado River cutthroat trout and Bonneville cutthroat trout would be allowed. Any water necessary for construction, operation, or maintenance (including dust abatement) would not be acquired from existing water sources.

AIR-1: The Applicant shall cover construction materials and stockpiled soils if these are sources of fugitive dust.

AIR-2: To minimize fugitive dust generation, the Applicant shall water land before and during surface clearing or excavation activities. Areas where blasting would occur should be covered with mats.

AIR-3: Dust abatement techniques (e.g., water spraying) shall be used by the Applicant on unpaved, unvegetated surfaces to minimize airborne dust. Water for dust abatement should be obtained and used by the Applicant under the appropriate state water use permitting system. Used oil will not be used for dust abatement.

AQ-1: In Region II, the Alternative B transmission line route passes within about 10 miles of Arches National Park. No concrete batch plants would be located within 30 miles of Arches National Park; therefore, concrete required for structure foundations should be acquired from local sources in the vicinity of Moab.

AQ-2: In Region III, the Proposed Action (Alternative A) passes within about 20 miles of Zion National Park. No concrete batch plants would be located within 30 miles of Zion National Park; therefore, concrete required for structure foundations should be acquired from local sources in the vicinity of Cedar City or St. George, Utah.

AQ-3: The Clark County nonattainment area is located in both Region III and Region IV. No new concrete batch plants are to be located within the nonattainment area; concrete required for structure foundations and other construction are to be acquired from existing local vendors.

PHS-1: The Applicant shall prepare an explosives use plan that specifies the times and meteorological conditions when explosives will be used and specifies minimum distances from sensitive vegetation and wildlife or streams and lakes.

The following dust and air control measures were identified in the main body of the DEIS.

- Predict future impacts from externally initiated actions prior to approval of those actions. Comply with all applicable local, state, and federal regulations to limit air quality degradation;
- Reduce vehicle speeds on native surfaced roads (e.g., 15 miles per hour [mph])
- Restrict surface disturbing activities to periods when wind speeds are less than 25 mph.
- To minimize fugitive dust, the Applicant shall cover, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dust; and