Attachment 7

Dust and Emissions Control Plan

Mohave County Wind Farm Project

Draft

Dust and Emissions Control Plan

March 2013

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OVERVIEW

BP Wind Energy North America Inc. (BP Wind Energy or Proponent) is proposing to construct, operate, maintain, and eventually decommission a wind-powered electrical generation facility in Mohave County, Arizona. The proposed action, the Mohave County Wind Farm Project (Project), would be built in the White Hills of Mohave County about 40 miles northwest of Kingman, Arizona, and just south of Lake Mead National Recreation Area. The side slopes of the White Hills provide a unique combination of sufficient wind resource, good physical access, the presence of suitable transmission access, and few known environmental issues.

The Wind Farm Project would include approximately 38,099 acres of public land managed by the Bureau of Land Management (BLM) Kingman Field Office (KFO) (Agency), and approximately 8,960 acres of land managed by the Bureau of Reclamation (Reclamation) (Agency). Project features (details are provided in the Mohave County Wind Farm Project Final Environmental Impact Statement (EIS), Chapter 1, Section 1.1) within the Wind Farm Project Area would include, but not be limited to, water wells, turbines aligned within corridors, access roads, an operations and maintenance (O&M) building, two temporary laydown/staging areas (with temporary batch plant[1] operations), temporary and permanent meteorological (met) towers, two substations, and electrical collector lines and a transmission line to bring the power to the switchyard[2] that would be operated by the Western Area Power Administration (Western). The switchyard would interconnect to one of the two high-voltage transmission lines that pass through the Wind Farm Site to tie the power generated into the electrical grid.

Project features outside of the Wind Farm Project Area include an existing "Materials Site" (gravel pit) located adjacent to the off-Project main access road connecting the Project Highway 93, the off-Project access road, and an electric distribution line that parallels the access road.

It is the responsibility of Proponent's construction contractors (Contractor) working with third party Construction Inspectors contracted for Agency(s) to ensure this Dust Control (Plan) is implemented.

INTRODUCTION

BP Wind Energy is committed to work within the parameters of all federal, state and local environmental protection policies and regulations at all project locations. This long-standing commitment includes activities that take place at our corporate offices and all of our project locations. We also require any subcontractor, vendor and any other applicable or effected entity to conform to this same "commitment" of working within the parameters of all applicable environmental protection policies while they are associated with our operations.

In the event of a conflict within the coordination of requirements of applicable promulgated standards, the stricter of those laws will be applied and enforced.

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[1] A manufacturing plant where concrete is mixed and made ready to be poured before being transported to a construction site.
[2] A facility where electricity from the electrical generator is transferred to the electric grid.

Dust can affect the health of people, property or business. Dust can also represent a risk to safety when conditions are allowed to inhibit visibility. Operators of a construction site must take reasonable precautions to prevent dust from becoming airborne and from being tracked onto paved public roads.

SOURCES OF DUST

Construction sites generate dust from a variety of sources. These sources are a summary of details provided in Final EIS, Chapter 4, and Section 4.2.1 and include the following:

- Vehicle and equipment traffic on paved and unpaved roads
- Earthmoving vehicles and equipment during construction
- Wind erosion from disturbed and exposed soils, including stockpiles
- Materials handling, conveyance, and transport within site boundaries, including the Material Site and main access road outside the Project Boundary

Please refer to the recommended Best Management Practices (BMP) section in the Final EIS (Appendix B) for mitigation measures for each of these sources.

DUST MONITORING GUIDELINES

Dust abatement procedures are a significant concern on BP Wind Energy projects. Dust generating operation shall not allow visible fugitive dust emissions to exceed 40% opacity for greater than 10 seconds for all construction vehicles. Visible dust crossing any property line will be considered excessive when it is observed for longer than 30 seconds over a cumulative six minute period.

Trained environmental monitors will be onsite daily to monitor dust levels and make recommendations as needed to ensure air quality standards and compliance requirements are met. All of the environmental monitors' findings will be reported to the onsite compliance monitor to ensure that the site is in compliance with all of our environmental requirements. If dust control problems are found to be reoccurring throughout construction trained dust control monitors will be brought onsite to monitor dust levels and make additional recommendations when appropriate.

RECOMMENDED BEST MANAGEMENT PRACTICES

BP Wind Energy incorporates a variety of abatement procedures as conditions dictate. Abatement techniques include preventing the creation of fugitive dust, binding dust particles together, and reducing wind speed at ground level. Trucks transporting mineral materials for road construction will be covered with tarps. Dust abatement efforts shall be monitored and recorded by the environmental monitors. Details on dust abatement mitigations are provided in the Final EIS, Chapter 4, Section 4.2.7, Final EIS Appendix B – BMPs, the Plan of Development (POD), Attachment Health, Safety, Security & Environmental Management Plan (HSSE), and Attachment QQ-BMPs.

WATER

During the duration of the project, BP Wind Energy anticipates employing at least four 3,000-gallon (or larger) water trucks for dust suppression and control. This will be one of the primary method of dust control. Additional water trucks as needed will be employed during peak construction activities when evaporations rates are highest. Water trucks will operate the full length of the shift(s) so that fugitive dust emissions do not interfere or significantly impact the surrounding environment, project construction activities, or adjacent public and private properties. BP Wind Energy will apply water so that the surface is visibly moist on trafficked roads and in the areas where work is taking place. Water for the dust control would be obtained from three existing production wells at the Materials Source production site. The expected use of the well water for dust control will be as follows from Table 2-3 of the Mohave County Wind Farm Project Final EIS date March 2013:

Well Capacity and Anticipated Water Use for the Project

Water Required for Construction of the Project					
Well Capacity		**Activity**	**GPD**	**Weekly Requirement (5-day Work Week)**	**Total – 39 Weeks**
Well 1 GPM	1,000	Dust Control	100,000	500,000	19,500,000
Well 2 GPM	400	Cement Production	25,000	125,000	4,875,000
Well 3 GPM	200	Truck washing, hydrating aggregate	15,000	75,000	2,925,000

It is anticipated that all dust control water needs would be filled by the existing wells. Additional water if required would be transported via water trucks to the project site.

CHEMICAL DUST SUPPRESSANT METHODS

BP Wind Energy recognizes that the extreme conditions will require additional dust control methods. BP Wind Energy will employ the use of a BLM, Reclamation, or State of Arizona approved dust palliative applied using the admix method and/or to the surface of gravel access roads at the application rate and frequency specified by the manufacturer along constructed roads, where required, particularly on high traffic and controlled areas. Dust palliative will also be applied 100 feet in each direction of a public road intersection and ¼ mile in each direction of a private driveway and public road.

STABILIZATION

BP Wind Energy will take preventative measures to limit dust from disturbed soils. Disturbed surface areas will be controlled via construction sequencing and clearing will be kept to a minimum width within the right of ways. Topsoil and spoils will be stockpiled, with low height profiles where possible, according to the various finalized environmental plans including the Storm Water Pollution Prevention Plan , the POD and the Integrated Reclamation Plan and Noxious Weed Management Plan (POD Attachment). These plans will remain in effect for the duration of the project. In addition to this Construction Entrances will be installed at various areas within the Wind Farm Project Area to minimize track out.

ADDITIONAL DUST CONTROL MEASURES

BP Wind Energy will implement a project traffic control plan, POD Attachment 5, Mohave Transportation and Traffic Plan (when finalized), which will enforce speed limits designed to keep dust creation at a low level as possible. Typically those project site speed limits will be 25 miles per hour (mph) or less on all project access roads. Construction vehicle speed limits are also enforced throughout graveled county and or public roads that run through the project jobsite limiting their speed to 25 mph. Controlling the vehicle speed limits throughout the project will reduce dust emissions from loads and dust from the road. Construction activities would be monitored and if dust levels exceed acceptable standards, adaptive management would be employed, which could include watering travel surfaces and/or lowering these speed limits incrementally until dust is reduced. Additionally earth moving activity would be minimized and vehicle speeds reduced if sustained winds exceed 22 mph or if gusts exceed 30 mph. Dust monitoring and any adaptive measures to reduce dust levels will be in accordance with the “POD Attachment 5, Mohave Transportation and Traffic Plan” (when finalized) and this Dust and Emissions Control Plan.

ATTACHMENT A
PROJECT SITE MAP – PREFERRED ALTERNATIVE (DRAFT)