## Shasta County AQMD Comments Regarding Fountain Wind Project 16-007

The informal comments below are provided to the Shasta County Planning Division in relation to the Fountain Wind Project.

## Construction phase emissions-

Associated with heavy-duty equipment, fugitive dust, and emissions from construction vehicles traveling to and from each component site, grubbing/land clearing and grading/excavation.

Assess for and apply Standard Mitigation Measures- Potential mitigation measures are listed below.

## Particulate Matter- PM10

- -Alternatives to open burning of vegetative material on the project site will be used by the project applicant unless otherwise deemed infeasible by the AQMD. Examples of suitable alternatives are chipping, mulching, and conversion to biomass fuel.
- -The applicant will be responsible for ensuring that all adequate dust control measures are implemented in a timely and effective manner during all phases of project development and construction.
- -All material excavated, stockpiled, or graded should be sufficiently watered to prevent fugitive dust from leaving property boundaries and causing a public nuisance or a violation of an ambient air standard. Watering should occur at least twice daily with complete site coverage, preferably in the mid-morning and after work is completed each day.
- -All areas (including unpaved roads) with vehicle traffic should be watered periodically or have dust palliatives applied for stabilization of dust emissions.
- -All onsite vehicles should be limited to a speed of 15 miles per hour on unpaved roads.
- -All land clearing, grading, earth moving, and excavation activities on a project will be suspended when winds are expected to exceed 20 miles per hour.
- -All inactive portions of the development site should be seeded and watered until suitable grass cover is established.
- -The applicant will be responsible for applying (according to manufacturer's specifications) nontoxic soil stabilizers to all inactive construction areas (previously graded areas that remain inactive for 96 hours) in accordance with the Shasta County Grading Ordinance.
- -All trucks hauling dirt, sand, soil, or other loose material should be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. This provision will be enforced by local law enforcement agencies.
- -All material transported off site will be either sufficiently watered or securely

covered to prevent a public nuisance.

- -During initial grading, earth moving, or site preparation, the project will be required to construct a paved (or dust palliative—treated) apron, at least 100 feet in length, onto the project site from the adjacent paved road(s).
- -Paved streets adjacent to the development site should be swept or washed at the end of each day to remove excessive accumulations of silt and/or mud that may have accumulated as a result of activities on the development site.
- -Adjacent paved streets will be swept at the end of each day if substantial volumes of soil materials have been carried onto adjacent public paved roads from the project site.
- -Wheel washers will be installed where project vehicles and/or equipment enter and/or exit onto paved streets from unpaved roads. Vehicles and/or equipment will be washed prior to each trip.
- Prior to final occupancy, the applicant will reestablish ground cover on the construction site through seeding and watering in accordance with the Shasta County Grading Ordinance.

## PM 2.5, NOx, ROG

- -Limit the area subject to excavation, grading, and other construction activity at any given time.
- -Limit the hours of operation of heavy-duty equipment and/or the amount of equipment in use.
- -Replace fossil-fueled equipment with electrically driven equivalents (provided they are not run by a portable generator set).
- -Require that all diesel engines be shut off when not in use to reduce emissions from idling.
- -During the smog season (May through October), lengthen the construction period to minimize the number of vehicles and equipment operating at the same time.
- -Off-road trucks should be equipped with on-road engines when possible.
- -Minimize obstruction of traffic on adjacent roadways.
- -Power construction equipment with diesel engines fueled by alternative diesel fuel blends or ultra low sulfur diesel (ULSD). Only fuels that have been certified by ARB should be used. ARB has verified specific alternative diesel fuel blends for NOX and PM emission reduction. The applicant should also use ARB-certified alternative fueled (compressed natural gas [CNG], liquid propane gas [LPG], electric motors, or other ARB certified off-road technologies] engines in construction equipment where practicable.
- -Use construction equipment that meets the current off-road engine emission standard (as certified by ARB) or that is re-powered with an engine that meets this standard.

**Operational phase emissions-** Identify any type of equipment that may require a District permit such as backup generators.

January 16, 2018- JW