

DOCKETED

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Project Title:	Carlsbad Energy Center - Compliance
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Document Title:	AIR QUALITY MANAGEMENT PLAN AQ-SC2 FOR DEMOLITION OF THE ENCINA POWER STATION
Description:	AIR QUALITY MANAGEMENT PLAN AQ-SC2 FOR DEMOLITION OF THE ENCINA POWER STATION
Filer:	Anwar Ali
Organization:	Carlsbad Energy Center LLC
Submitter Role:	Applicant
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December 31, 2019

Mr. George Piantka
Director Regulatory Environmental Service
NRG Energy, Inc., West Region
4600 Carlsbad Boulevard
Carlsbad, California 92008

**SUBJECT: ENCINA POWER STATION/AMENDED CARLSBAD ENERGY
CENTER PROJECT (07-AFC-06C) – APPROVAL OF DEMOLITION AIR
QUALITY MANAGEMENT PLAN**

Dear Mr. Piantka:

In accordance with the Conditions of Certification **AQ-SC2**, staff has reviewed and approved the Air Quality Management Plan.

If you have any questions or concerns, please contact Anwar Ali, Compliance Project Manager, at (916) 654-5020, or by fax to (916) 654-3882, or via e-mail at anwar.ali@energy.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan Fong".

Jonathan Fong
Compliance Office Supervisor
Siting, Transmission, and Environmental
Protection Division



**NRG Encina Cabrillo I Power
Operations, Inc.**

4600 Carlsbad Blvd.
Carlsbad, CA 92008
Phone: 760-268-4000
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December 20, 2019

Mr. Anwar Ali, PhD
Compliance Project Manager
Docket No. 07-AFC-6C
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

**RE: ENCINA POWER STATION (CABRILLO POWER I LLC) DEMOLITION –
Carlsbad Energy Center - Docket No. 07-AFC-06C
CONDITION OF CERTIFICATION, AQ-SC2,
AIR QUALITY MANAGEMENT PLAN (Updated)**

Dear Dr. Ali:

NRG Energy, Inc. (NRG/Project Owner) submits the revised Air Quality Management Plan (Plan) in compliance with Condition of Certification (COC) AQ-SC2 on behalf of Cabrillo Power I LLC, owner of Encina Power Station (Encina), located at 4600 Carlsbad Boulevard, Carlsbad, California. The Amended CECP license (07-AFC-06C) includes requirements to decommission and demolish Encina identified as Phases III and IV of the Amended CECP. The documentation is to meet a requirement applicable to Phase IV - Encina demolition.

COC AQ-SC2 requires submittal of a Plan that ensures construction air quality compliance and details reporting requirements of AQ-SC3 (Fugitive Dust Control), AQ-SC4 (Dust Plume Response Requirement), and AQ-SC5 (Diesel Fuel Engine Control). AQ-SC2 requires submittal of the Plan to California Energy Commission (CEC) Compliance Project Manager (CPM) for review and approval. The revised Plan includes clarification that asbestos management is addressed in Waste Management-5 (Demolition Waste Management Plan) and Waste Management-6 (Demolition Notification Plan per San Diego Air Pollution Control District Rule 1206) and in Worker Safety-1 (Demolition Health and Safety Plan).

If you have any questions regarding this submittal, please contact George Piantka at (760) 707-6833 or Ralph Wagner at (916) 230-5861.

Sincerely,

A handwritten signature in black ink that reads "George L. Piantka". The signature is written in a cursive, flowing style.

George L. Piantka, PE
Sr. Director, Environmental

Enclosure: Air Quality Construction Management Plan Phase I, Carlsbad Energy
Center Project, Condition of Certification, AQ-SC2, October 2019

Cc: Giyan Senaratne, WC3, Delegate CBO

**Air Quality Construction Mitigation Plan
Amended Carlsbad Energy Center Project**

(07-AFC-06C)

San Diego County, California

Adapted by Burns & McDonnell Engineering Co.

for

ACECP Phase IV EPS Demolition Activities

on behalf of

Cabrillo Power I LLC

4600 Carlsbad Blvd.

Carlsbad, CA 92008

From the document previously prepared in November 2015 by

CH2MHill

6 Hutton Centre Drive

Suite 700

Santa Ana, CA 92707

Updated December 20, 2019

Contents

Section	Page
Acronyms and Abbreviations	v
Introduction	1-1
1.1 Project Location	1-1
1.2 Project Description	1-2
Conditions of Certification	2-1
Air Quality Construction Mitigation Manager	3-1
Construction Emission Control Measures	4-1
4.1 Fugitive Dust Control Plan	4-1
4.2 Fugitive Dust Sources.....	4-2
4.3 Dust Plume Response Requirement	4-2
Diesel-Fueled Engine Control	5-1
Reporting Requirements	6-1
Fugitive Dust Compliance Measures.....	6-1
Diesel Equipment Compliance Measures	6-2

Table

2-1	Applicable Conditions of Certification
3-1	Onsite Contact Information for Amended CECP Phase IV Demolition Activities

Appendixes

A	Site Layout Demolition Plan
B	CEC Conditions of Certification
C	Example Diesel Powered Construction Equipment Tag
D	Example Air Quality Compliance Checklist
E	Example Monthly Compliance Report Format

Acronyms and Abbreviations

AQCMM	Air Quality Construction Mitigation Manager
AQCMP	Air Quality Construction Mitigation Plan
CEC	California Energy Commission
Amended CECP	Amended Carlsbad Energy Center Project
COC	Conditions of Certification
CPM	Compliance Project Manager
EPS	Encina Power Station
hp	Horsepower
I-5	Interstate-5
MCR	Monthly Compliance Report
NCTD	North County Transit District
Project Owner	Cabrillo Power I LLC
PTA	Petition to Amend
SDG&E	San Diego Gas and Electric

SECTION 1.0

Introduction

Cabrillo Power I LLC (“Project Owner”) has prepared this update to the previously approved Air Quality Construction Mitigation Plan (AQCMP) for the Amended Carlsbad Energy Center Project (“Amended CECP” or “Project”) in San Diego County, California. This AQCMP is applicable to the activities associated with the Petition to Amend (PTA), as submitted by the Project Owner in April of 2014. This AQCMP has been prepared in accordance with Condition of Certification (COC) AQ-SC2, in the California Energy Commission’s (CEC’s) Amended CECP Final Decision (07-AFC-06C; July 2015).

This AQCMP provides the detail steps to be taken and the reporting requirements necessary to ensure compliance with the AQ-SC1, AQ-SC2, AQ-SC3, AQ-SC4, AQ-SC5 and AQ-SC12. This AQCMP has been prepared to address the Amended CECP Phase IV demolition of the Encina Power Station (EPS) activities. *The AQCMP does not address asbestos management specifically as asbestos management is addressed by Conditions of Certification Waste Management-5 (Demolition Waste Management Plan) and Waste Management -6 (Demolition Notification per San Diego Air Pollution Control District Rule 1206) and in Worker Safety-1 (Demolition Health and Safety Plan).*

An AQCMP was submitted in October 2014 for CECP Phase I Tank demolition/removal activities for Tanks 5, 6, and 7, in support of the relevant COCs adopted by the CEC in its June 2012 Final Decision (07-AFC-06C). The AQCMP was updated in July 2015 for Amended CECP Phase I demolition of Tanks 1, 2, and 4, and as needed soil remediation in the tank basins, in support of the COCs in Amended CECP Final Decision (07-AFC-06C; July 2015). After CEC Compliance Project Manager (CPM) approval in December 2014 and July 2015, respectively, compliance measures, as prescribed in the approved current AQCMP, have been monitored at the site and reported on in monthly compliance reports (MCR) submitted to the CEC CPM until December 2018. CECP Phase I activities commenced in February 2014 and Amended CECP Phase I activities commenced in July 2015. A separate plan for Phase II construction activities was prepared in November 2015 with work concluding in September 2018. Phase III decommissioning activities commenced in December 2018. MCR concluded in December 2018 with the end of construction and commissioning of Amended CECP and will resume in October 2019 (MCR to be issued in November 2019) with the start of Phase IV demolition mobilization.

As stated in COC AQ-SC2, prior to the start of ground disturbance for Amended CECP construction, the Project Owner previously submitted a version of this AQCMP to the CPM for approval. The AQCMP was approved by the CPM before the start of ground disturbance for Amended CECP construction. *This updated AQCMP addresses Phased IV – Encina Demolition per AQ-SC2 and is supported by updated Demolition Waste Management Plan and Demolition Health and Safety Plan per Waste Management-5 and Worker Safety-1, respectively, which were submitted to the CEC separately.*

1.1 Project Location

The Amended CECP site is located in Carlsbad, San Diego County, California (Appendix A). The site address is 4600 Carlsbad Boulevard, Carlsbad, California 92008. The Amended CECP site is located in Township 12 South, Range 4 West, Section 7, in San Diego County. The Amended CECP site is bordered to the east by I-5, to the south by the SDG&E maintenance yard, to the west by the Pacific Ocean, and to the north by the Agua Hedionda Lagoon. The Project site is bisected by the North County Transit District (NCTD) Railroad Right-of-Way that runs north and south through EPS. Cabrillo Power I operates a private rail crossing under a license agreement with NCTD, enabling internal vehicle traffic to cross the rail line. The predominant project location for Phase IV activities of the Amended CECP is the property to the

west of the NCTD railway and to the east of Carlsbad Boulevard. The predominant land use in the vicinity of the site is industrial. Residential, commercial, agricultural, and open space land uses are also situated nearby.

1.2 Project Description

The Amended CECP has been divided into four phases as follows:

- **Phase I** – Above grade demolition/removal activities for Tanks 1, 2, 4, 5, 6 and 7 including soil remediation in the tank basins, as needed, and berm removal between Tanks 4 and 5, 5 and 6, and 6 and 7. This phase includes soil disturbance and excavations associated with soil remediation activities. Above grade demolition and removal of Tanks 5, 6 and 7 and is being accomplished under the existing CEC License for CECP.
- **Phase II** – Site preparation, construction, commissioning, and operation of the Amended CECP as modified by the PTA.
- **Phase III** – Retirement and decommissioning of the EPS facility.
- **Phase IV** – Demolition of the EPS facility. Phase IV specifically excludes below grade demolition and site remediation, which will be accomplished under the authority of San Diego County Environmental Health Department (site remediation) and the City of Carlsbad (redevelopment of the site for future use) subsequent to the completion of Phase IV.

Demolition equipment used will be typical of demolition work and will include excavation equipment (such as track excavators, front-end loaders and back-hoes), off-road forklifts, man-lifts, small diesel generators, delivery trucks, 10-wheel dump trucks, semi-tractor trailer trucks, cranes, cement trucks, and construction crew support trucks. Oversized loads will be delivered on multiple axle trucks with escort vehicles. If work were to occur after dark, portable, diesel powered construction lights will be provided, as needed and will be inspected in accordance with this AQCMP.

Water supply required for EPS demolition will be pulled from a Title 22 water source provided by the City of Carlsbad located at the EPS facility. The average demolition and abatement workforce is expected to range from 15 to 90 workers over an approximately 27-month period.

SECTION 2.0

Conditions of Certification

The CEC issued COC AQ-SC2 which requires preparation and implementation of an AQCMP as follows:

AQ-SC2: Air Quality Construction/Demolition Mitigation Plan (AQCMP): The Project Owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5.

Verification: At least 60 days prior to the start of any ground disturbance, the Project Owner shall submit the AQCMP to the CPM for approval. The CPM will notify the Project Owner of any necessary modifications to the plan within 30 days from the date of receipt. The AQCMP must be approved by the CPM before the start of ground disturbance.

The Project Owner has satisfied this COC previously and has updated the AQCMP accordingly for Phase IV EPS Demolition. Table 2-1 provides a list of the Air Quality COCs applicable to the AQCMP for EPS demolition. A full description of applicable COCs is provided in Appendix B.

TABLE 2-1
Applicable Conditions of Certification

COC	Condition of Certification
AQ-SC1	Air Quality Construction Mitigation Manager (AQCM)
AQ-SC2	Air Quality Construction Mitigation Plan (AQCMP)
AQ-SC3	Construction Fugitive Dust Control
AQ-SC4	Dust Plume Response Requirement
AQ-SC5	Diesel-Fueled Engine Control
AQ-SC12	Schedule for Start and Conclusion of Work Phases
AQ-SC13	Imploding or Felling Concrete or Mortar Structures

SECTION 3.0

Air Quality Construction Mitigation Manager

COC AQ-SC1 describes the requirements and responsibilities of the Air Quality Construction Mitigation Manager (AQCOMM). The AQCOMM, or an AQCOMM Delegate, will be responsible for ensuring that the required construction mitigation measures of this AQCMP are successfully implemented throughout Phase IV activities.

The AQCOMM will work with the demolition contractor's Construction Manager to ensure that all workers are aware of and follow the requirements of the AQCMP. A single AQCOMM or an AQCOMM Delegate will be responsible for overseeing the work associated with Amended CECP Phase IV activities. In accordance with the requirements of COC AQ-SC1, the Project Owner will submit the names, resumes, qualifications, and contact information for the onsite AQCOMM and the AQCOMM Delegates to the CEC CPM for approval prior to the Phase IV work. The AQCOMM and Delegates are included in Table 2-1.

Contact information for the demolition contractor's Construction Manager responsible for the implementation of the AQCMP is provided in Table 2-1.

TABLE 3-1
Onsite Contact Information for Amended CECP Phase IV Demolition Activities

Title	Organization	Contact
Construction Manager	Project Owner	Ralph Wagner Title: Project Director Address: NRG Energy Inc. 4600 Carlsbad Blvd. Carlsbad, CA 92008 Phone: (760) 930-1519 Cell: (916) 230-5861
Compliance Project Manager	CEC	Anwar Ali Title: Compliance Project Manager Address: 15165 Ninth St, MS-2000 Sacramento, CA 95814-5512 Phone: 916-654-5005
Air Quality Construction Mitigation Manager	Project Owner	George Piantka Title: Senior Director- Environmental Address: NRG Energy Inc. 4600 Carlsbad Blvd. Carlsbad, CA 92008 Phone: (760) 930-1505 Cell: (760) 707-6833
Air Quality Construction Mitigation Manager – Delegate	Project Owner	Tim Sisk Title: Environmental Manager Address: NRG Energy Inc. 4600 Carlsbad Blvd. Carlsbad, CA 92008 Phone: (760) 930-1507 Cell: (860) 334-8081

SECTION 4

Construction Emission Control Measures

Because the majority of the Project site and access roads are paved, fugitive dust due to traffic is anticipated to be limited. The primary sources of emissions will be fugitive demolition dust and construction equipment engines as discussed in Section 5.

4.1 Fugitive Dust Control Plan

Based on COC AQ-SC3, the following fugitive dust control measures will be implemented to prevent all fugitive dust plumes from leaving the Project site and linear facility routes during the Amended CECP Phase IV demolition activities:

- All unpaved roads and disturbed areas in the Project and laydown construction/demolition sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering may be reduced or eliminated during periods of precipitation.
- No vehicle shall exceed 10 miles per hour on unpaved areas within the Project and laydown construction/demolition sites.
- The construction/demolition site entrances shall be posted with visible speed limit signs.
- All construction/demolition equipment vehicle tires shall be inspected and washed as necessary to be cleaned and free of dirt prior to entering paved roadways.
- Gravel ramps or truck pads of at least 20 feet in length must be provided at the tire washing/cleaning station.
- All unpaved exits from the construction/demolition site shall be graveled or treated to prevent track-out to public roadways.
- All construction/demolition vehicles shall enter the construction/demolition site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM.
- Construction/demolition areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan to prevent runoff to roadways.
- All paved roads within the construction/demolition site shall be swept at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs to prevent the accumulation of dirt and debris.
- At least the first 500 feet of any public roadway exiting the construction/demolition site shall be swept visually clean, using wet sweepers or air filtered dry vacuum sweepers, at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs or on days when dirt or runoff from the construction/demolition site is visible on the public roadways.
- All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered or shall be treated with appropriate dust suppressant compounds.
- All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause visible emissions shall be provided with a cover or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard.

- Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction/demolition areas that may be disturbed as necessary to comply with the dust mitigation objectives of AQ-SC4. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.
- Disturbed areas will be re-vegetated as soon as practical.
- With the exception of site grading or loading/unloading activities, haul trucks used during the EPS demolition shall be limited to traveling on paved or graveled surfaces at all times within the boundary of the Encina Power Station property.

The above requirements are incorporated in this AQCMP. The fugitive dust requirements listed above for COC AQ-SC3 may be replaced with as stringent or more stringent methods as required by SDAPCD Rule 55.

4.2 Fugitive Dust Sources

Fugitive dust may be generated from ground preparations activities, such as grading. Fugitive dust may also be generated from the travel of equipment and vehicles on paved and unpaved surfaces at the site. Finally, fugitive dust may be generated by breaking and demolition of concrete and other building materials. However, in accordance with COC AQ-SC13, no implosion of concrete or mortar structures will be performed during the EPS demolition. This will limit the occurrence of substantial dust-generating events.

4.3 Dust Plume Response Requirement

In accordance with CEC COC AQ-SC4, the AQCMM or an AQCMM Delegate shall monitor all construction/demolition activities for visible dust plumes with the potential to be transported off the Project site, 200 feet beyond the centerline of the construction of linear facilities, within 100 feet upwind of any regularly occupied structures, or within 50 feet upwind of I-5.

In the event that the mitigation measures outlined in Section 3.1 are not effective in reducing the offsite visible dust plumes (with the exception of visible emissions within 50 feet upwind of the I-5 freeway), the following additional fugitive dust response measures will be implemented during Project construction to comply with CEC COC AQ-SC4:

Step 1: Within 15 minutes of making such a determination, the AQCMM or AQCMM Delegate shall direct more intensive application of the existing mitigation methods, such as additional soil wetting.

Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, the AQCMM or delegate shall direct implementation of additional methods of dust suppression, such as introducing additional dust suppression equipment, relocation of dust suppression equipment, application of additional soil wetting, soil stabilizers, visqueen, or a geotech fabric.

Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

In the event the mitigation measures outlined in Section 3.1 of this plan are not effective in reducing the offsite visible dust plumes within 50 feet upwind of I-5, the following fugitive dust response measures will be implemented in order to comply with CEC COC AQ-SC4:

Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5. The AQCMM or AQCMM Delegate shall direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.

Step 2: The AQCMM or AQCMM Delegate shall direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.

Step 3: The AQCMM or AQCMM Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes that could impact visibility on I-5 will not occur upon restarting the shut-down fugitive dust source.

The following describes in more detail the additional techniques that may be used to limit visible dust emissions from activities that cause fugitive dust emissions:

- **Pre-Activity:** The work site may be pre-watered before construction/demolition begins as need to reduce fugitive dust as directed by the AQCMM or AQCMM Delegate.
- **Unpaved Access and Haul Roads and Laydown Areas:** If application of water is inadequate to control dust, chemical suppressants may be applied to unpaved access and haul roads and laydown areas for the duration of the construction/demolition period.
- **Inactive Operations:** During inactive periods (such as after work hours, weekends, and holidays), any storage piles and disturbed surface areas that remain inactive for longer than 10 days will be covered, or other dust suppressants will be applied, and vehicle access will be restricted.
- **Wind Erosion Control:** Wind erosion control techniques (such as placement of gravel or chemical dust suppressants) shall be used on construction areas that may be disturbed and are contributing to visible fugitive dust emissions. Installed wind erosion control measure(s) shall remain in place until the soil is stabilized.

SECTION 5

Diesel-Fueled Engine Control

To comply with CEC COC AQ-SC5, the following diesel-fueled engine control measures will be implemented during EPS demolition activities:

- All diesel-fueled engines used in the construction/demolition of the facility shall have clearly visible tags, issued by the on-site AQCMM, showing that the engine meets the conditions set forth herein (see Appendix C).
- All construction/demolition diesel engines with a rating of 50 horsepower (hp) or higher shall meet, at a minimum, the Tier 4 or Tier 4i California Emission Standards for Off-Road Compression- Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b)(1), unless a good faith effort to the satisfaction of the CPM that is certified by the on-site AQCMM demonstrates that such engine is not available for a particular item of equipment. In the event that a Tier 4 or Tier 4i engine is not available for any off-road equipment larger than 50 hp, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides and diesel particulate matter to no more than Tier 3 levels, unless certified by engine manufacturers or the on-site AQCMM that the use of such devices is not practical for specific engine types. For purposes of this condition (AQ-SC5), the use of such devices is not practical for the following, as well as other, reasons:
 1. There is no available retrofit control device that has been verified by either the California Air Resources Board or U.S. Environmental Protection Agency to control the engine in question to Tier 3 equivalent emission levels and the highest level of available control using retrofit or Tier 2 engines is being used for the engine in question; or
 2. The construction/demolition equipment is intended to be on site for ten working days or less.
 3. The CPM may grant relief from this requirement if the AQCMM can demonstrate a good faith effort to comply with this requirement and that compliance is not practicable.
- The use of a retrofit control device may be terminated immediately, provided that the CPM is informed within 10 working days of the termination and that a replacement equipment meeting the emission requirements as described above (Tier 4 or Tier 4i) occurs within 10 working days of the retrofit termination. If the equipment would be needed to continue working at the site for more than 15 days after the use of the retrofit control device is terminated, it may do so if the AQCMM or AQCMM designee demonstrates that one of the following conditions exists:
 1. The use of the retrofit control device is excessively reducing the normal availability of the construction/demolition equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure.
 2. The retrofit control device is causing or is reasonably expected to cause significant engine damage.
 3. The retrofit control device is causing or is reasonably expected to cause a significant risk to workers or the public.
 4. Any other seriously detrimental cause which has the approval of the CPM prior to implementation of the termination.

- All heavy earth-moving equipment and heavy-duty construction/demolition-related trucks with engines meeting the requirements above shall be properly maintained and the engines tuned to the engine manufacturer's specifications.
- All diesel heavy construction/demolition equipment shall not idle for more than 5 minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement.
- Construction/demolition equipment will employ electric motors when feasible.

SECTION 6

Reporting Requirements

A Monthly Compliance Report (MCR) will be prepared by the AQCMM or AQCMM Delegate for submittal to the CEC CPM, who will also otherwise be notified if any of the mitigation measures are not providing a level of protection appropriate for eliminating adverse impacts to air quality. This report may be provided via electronic format or disk at the Project Owner's discretion. The MCR will include the following information to meet the requirements of AQ-SC3 (Construction Fugitive Dust Control):

- A written summary or checklist of all actions taken to maintain compliance with the dust control measures. See Appendix D for example checklist.
- A figure of the site identifying the location of track-out control measures and posted speed limit signs.
- Copies of any complaints filed with the San Diego County Air Pollution Control District in relation to Project construction/demolition. Any other documentation deemed necessary by the CPM and AQCMM to verify compliance with the COCs.

Written documentation of the steps taken to comply with AQ-SC4 when dust emissions are visible will be included in the MCR. An example of the summary used to comply with AQ-SC4 is included in Appendix E. The written documentation will be completed and signed by the AQCMM or an AQCMM Delegate to confirm that attention has been given to each requirement on each day when emissions-generating construction activities may have occurred. Any deviation from the dust control mitigation measures shall require prior CPM notification and approval.

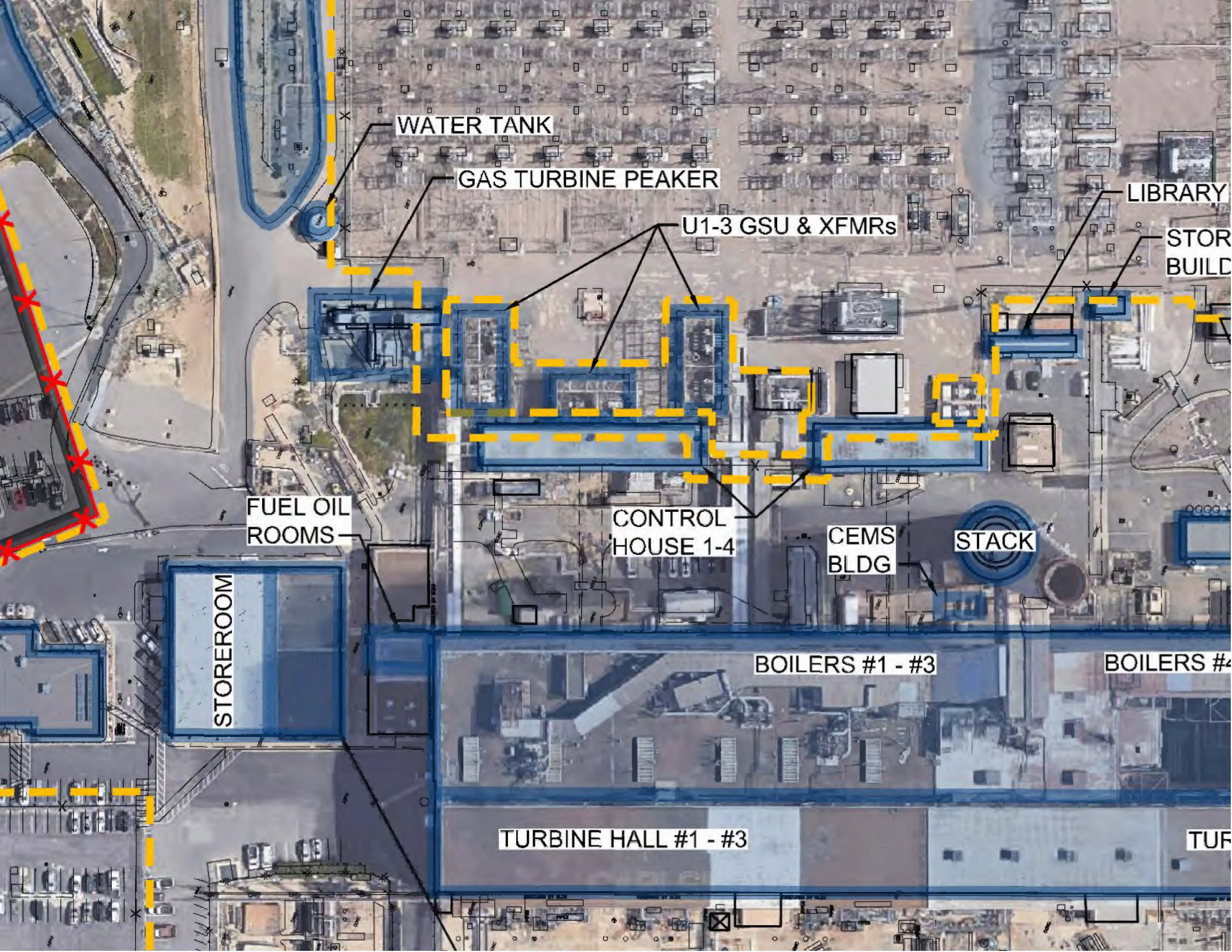
The MCR will additionally include the following information to meet the requirements of AQ-SC5 (Diesel-Fueled Engine Control):

- A summary of all actions taken to control diesel construction/demolition related emissions;
- A list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment has been properly maintained; and
- Any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition.

The diesel construction equipment information and mitigation determinations will be summarized in tables that will be a part of the monthly compliance reports. An example format for the monthly compliance report is included in Appendix E. Any deviation from the diesel mitigation measures shall require prior CPM notification and approval.

Phases I, II, and III of the Amended CECP were all completed during or before the first quarter of 2019, including commissioning of the gas turbines. Phase IV demolition activities are expected to commence after the second half of 2019. Therefore, in accordance with COC AQ-SC12, Phase IV EPS demolition activities will not be conducted concurrently with Phase I, II or III activities. The monthly compliance reports will include documentation of the start and end dates of each phase to demonstrate compliance with COC AQ-SC12.

Appendix A
Site Layout Demolition Plan



WATER TANK

GAS TURBINE PEAKER

U1-3 GSU & XFMRs

LIBRARY

STOR BUILD

FUEL OIL ROOMS

CONTROL HOUSE 1-4

CEMS BLDG

STACK

STOREROOM

BOILERS #1 - #3

BOILERS #4

TURBINE HALL #1 - #3

TUR

Appendix B
CEC Conditions of Certification

APPENDIX B

Air Quality Conditions of Certification for the Amended Carlsbad Energy Center Project

Conditions of Certification	
AQ-SC1	<p>Air Quality Construction/Demolition Mitigation Manager (AQCMM): The project owner shall designate and retain an on-site AQCMM who shall be responsible for directing and documenting compliance with conditions AQSC3, AQ-SC4, and AQ-SC5 for the entire project site and linear facility construction/demolition. The on-site AQCMM may delegate responsibilities to one or more AQCMM Delegates. The AQCMM and AQCMM Delegates shall have full access to all areas of construction on the project site and linear facilities and shall have the authority to stop any or all construction/demolition activities as warranted by applicable construction/demolition mitigation conditions. The AQCMM and AQCMM Delegates may have other responsibilities in addition to those described in this condition. The AQCMM shall not be terminated without written consent of the Compliance Project Manager (CPM).</p> <p>Verification: At least 60 days prior to the start of ground disturbance, the project owner shall submit to the CPM for approval the name, resume, qualifications, and contact information for the on-site AQCMM and all AQCMM Delegates. The AQCMM and all Delegates must be approved by the CPM before the start of ground disturbance.</p>
AQ-SC2	<p>Air Quality Construction/Demolition Mitigation Plan (AQCMP): The project owner shall provide an AQCMP, for approval, which details the steps that will be taken and the reporting requirements necessary to ensure compliance with conditions AQ-SC3, AQ-SC4, and AQ-SC5.</p> <p>Verification: At least 60 days prior to the start of any ground disturbance, the project owner shall submit the AQCMP to the CPM for approval. The CPM will notify the project owner of any necessary modifications to the plan within 30 days from the date of receipt. The AQCMP must be approved by the CPM before the start of ground disturbance.</p>
AQ-SC3	<p>Construction Fugitive Dust Control: The AQCMM shall submit documentation to the CPM in each Monthly Compliance Report (MCR) that demonstrates compliance with the following mitigation measures for the purposes of preventing all fugitive dust plumes from leaving the project site and linear facility routes. Any deviation from the following mitigation measures shall require prior CPM notification and approval.</p> <ul style="list-style-type: none"> a) All unpaved roads and disturbed areas in the project and laydown construction/demolition sites shall be watered as frequently as necessary to comply with the dust mitigation objectives of AQ-SC4. The frequency of watering may be reduced or eliminated during periods of precipitation. b) No vehicle shall exceed ten miles per hour on unpaved areas within the project and laydown construction/demolition sites. c) The construction/demolition site entrances shall be posted with visible speed limit signs. d) All construction/demolition equipment vehicle tires shall be inspected and washed as necessary to be cleaned and free of dirt prior to entering paved roadways. e) Gravel ramps or truck pads of at least 20 feet in length must be provided at the tire washing/cleaning station. f) All unpaved exits from the construction/demolition site shall be graveled or treated to prevent track-out to public roadways. g) All construction/demolition vehicles shall enter the construction/demolition site through the treated entrance roadways, unless an alternative route has been submitted to and approved by the CPM. h) Construction/demolition areas adjacent to any paved roadway shall be provided with sandbags or other measures as specified in the Storm Water Pollution Prevention Plan (SWPPP) to prevent runoff to roadways. i) All paved roads within the construction/demolition site shall be swept at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs to prevent the accumulation of dirt and debris. j) At least the first 500 feet of any public roadway exiting the construction/demolition site shall be swept visually clean, using wet sweepers or air filtered dry vacuum sweepers, at least twice daily (or less during periods of precipitation) on days when construction/demolition activity occurs or on any other day when dirt or runoff from the construction/demolition site is visible on the public roadways. k) All soil storage piles and disturbed areas that remain inactive for longer than ten days shall be covered or shall be treated with appropriate dust suppressant compounds. l) All vehicles that are used to transport solid bulk material on public roadways and that have the potential to cause

APPENDIX B

Air Quality Conditions of Certification for the Amended Carlsbad Energy Center Project

Conditions of Certification	
	<p>visible emissions shall be provided with a cover or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least two feet of freeboard.</p> <p>m) Wind erosion control techniques (such as windbreaks, water, chemical dust suppressants, and/or vegetation) shall be used on all construction/demolition areas that may be disturbed. Any windbreaks installed to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.</p> <p>n) Disturbed areas will be re-vegetated as soon as practical.</p> <p>o) Haul trucks used during the Encina Power Station demolition shall be limited to traveling on paved or graveled surfaces at all times within the boundary of the Encina Power Station property. The fugitive dust requirements listed in this condition may be replaced with as stringent or more stringent methods as required by SDAPCD Rule 55.</p> <p>Verification: The project owner shall include in the MCR: (1) a summary of all actions taken to maintain compliance with this condition, (2) copies of any complaints filed with the air district in relation to project construction/demolition, and (3) any other documentation deemed necessary by the CPM and AQCMM to verify compliance with this condition. Such information may be provided via electronic format or disk at the project owner's discretion.</p>
AQ-SC4	<p>Dust Plume Response Requirement: The AQCMM or Delegate shall monitor all construction/demolition activities for visible dust plumes. Observations of visible dust plumes that have the potential to be transported: (1) off the project site, (2) 200 feet beyond the centerline of the construction of linear facilities, (3) within 100 feet upwind of any regularly occupied structures not owned by the project owner, or (4) within 50 feet upwind of the I-5 freeway indicate that existing mitigation measures are not resulting in effective mitigation. The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes, other than those occurring upwind of the I-5 Freeway, are observed:</p> <p>Step 1: The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods within 15 minutes of making such a determination.</p> <p>Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression if Step 1 specified above fails to result in adequate mitigation within 30 minutes of the original determination.</p> <p>Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation within one hour of the original determination. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the shut-down source. The owner/operator may appeal to the CPM any directive from the AQCMM or Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.</p> <p>The AQCMM or Delegate shall implement the following procedures for additional mitigation measures in the event that such visible dust plumes occurring within 50 feet upwind of the I-5 Freeway are observed:</p> <p>Step 1: The AQCMM or Delegate shall immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on the I-5 freeway. The AQCMM or Delegate shall direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of the I-5 freeway but are not causing obscuration of visibility to drivers.</p> <p>Step 2: The AQCMM or Delegate shall direct implementation of additional methods of dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.</p> <p>Step 3: The AQCMM or Delegate shall direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. The activity shall not restart until the AQCMM or Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes that could impact visibility on the I-5 Freeway will not occur upon restarting the shut-down fugitive dust source.</p> <p>Verification: The AQCMP shall include a section detailing how the additional mitigation measures will be accomplished within the time limits or directions specified.</p>

APPENDIX B

Air Quality Conditions of Certification for the Amended Carlsbad Energy Center Project

Conditions of Certification	
AQ-SC5	<p>Diesel-Fueled Engine Control: The AQCMM shall submit to the CPM, in the Monthly Compliance Report, a construction/demolition mitigation report that demonstrates compliance with the AQCMP mitigation measures for purposes of controlling diesel construction/demolition-related emissions.</p> <p>The following off-road diesel construction/demolition equipment mitigation measures shall be included in the Air Quality Construction Mitigation Plan (AQCMP) required by AQ-SC2, and any deviation from the AQCMP mitigation measures shall require prior CPM notification and approval.</p> <p>a) All diesel-fueled engines used in the construction/demolition of the facility shall have clearly visible tags issued by the on-site AQCMM showing that the engine meets the conditions set forth herein.</p> <p>b) All construction/demolition diesel engines with a rating of 50 hp or higher shall meet, at a minimum, the Tier 4 or 4i California Emission Standards for Off-Road Compression-Ignition Engines, as specified in California Code of Regulations, Title 13, section 2423(b) (1), unless a good faith effort to the satisfaction of the CPM that is certified by the on-site AQCMM demonstrates that such engine is not available for a particular item of equipment. In the event that a Tier 4 or 4i engine is not available for any off-road equipment larger than 50 hp, that equipment shall be equipped with a Tier 3 engine, or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 3 levels unless certified by engine manufacturers or the on-site AQCMM that the use of such devices is not practical for specific engine types. For purposes of this condition, the use of such devices is “not practical” for the following, as well as other, reasons.</p> <ol style="list-style-type: none"> 1. There is no available retrofit control device that has been verified by either the California Air Resources Board or U.S. Environmental Protection Agency to control the engine in question to Tier 3 equivalent emission levels and the highest level of available control using retrofit or Tier 2 engines is being used for the engine in question; or 2. The construction/demolition equipment is intended to be on site for ten working days or less. 3. The CPM may grant relief from this requirement if the AQCMM can demonstrate a good faith effort to comply with this requirement and that compliance is not practical. <p>c) The use of a retrofit control device may be terminated immediately, provided that the CPM is informed within ten working days of the meeting the controls required in item “b” occurs within ten days of termination of the use, if the equipment would be needed to continue working at this site for more than 15 days after the use of the retrofit control device is terminated, if one of the following conditions exists:</p> <ol style="list-style-type: none"> 1. The use of the retrofit control device is excessively reducing the normal availability of the construction/demolition equipment due to increased down time for maintenance, and/or reduced power output due to an excessive increase in back pressure. 2. The retrofit control device is causing or is reasonably expected to cause engine damage. 3. The retrofit control device is causing or is reasonably expected to cause a substantial risk to workers or the public. 4. Any other seriously detrimental cause which has the approval of the CPM prior to implementation of the termination. <p>d) All heavy earth-moving equipment and heavy-duty construction/demolition-related trucks with engines meeting the requirements of (b) above shall be properly maintained and the engines tuned to the engine manufacturer’s specifications.</p> <p>e) All diesel heavy construction/demolition equipment shall not idle for more than five minutes. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement.</p> <p>f) Construction/demolition equipment will employ electric motors when feasible.</p> <p>Verification: The AQCMM shall include in a table in the Monthly Compliance Report the following to demonstrate control of diesel construction/demolition-related emissions:</p> <ol style="list-style-type: none"> A. A summary of all actions taken to control diesel construction/demolition-related emissions; B. A list of all heavy equipment used on site during that month, including the owner of that equipment and a letter from each owner indicating that equipment has been properly maintained; and C. Any other documentation deemed necessary by the CPM, and the AQCMM to verify compliance with this

APPENDIX B

Air Quality Conditions of Certification for the Amended Carlsbad Energy Center Project

Conditions of Certification	
	condition. Such information may be provided via electronic format or disk at the project owner's discretion.
AQ-SC12	<p>The project owner shall not allow the overlap of specific construction and demolition phase activities. The following activities shall not be conducted concurrently with any of the other listed activities:</p> <ol style="list-style-type: none"> 1. ASTs 5, 6, and 7 demolition (licensed CECP activity); 2. ASTs 1, 2, and 4 demolition and berm removal (PTR described activities); 3. Amended CECP construction (PTA described activities); and 4. EPS demolition (PTA and Encina Power Station Demolition Plan described activities). <p>In addition, the gas turbines initial commissioning activity and the EPS demolition activity shall not be performed concurrently.</p> <p>Verification: The project owner shall identify the start and conclusion of the work phases described above in the Monthly Compliance Reports.</p>
AQ-SC13	<p>The project owner shall not implode or fell any concrete or mortar structure, such as the main exhaust stack or the power plant building, during the demolition of the Encina Power Station.</p> <p>Verification: The project owner shall provide updates on the demolition progress and the demolition methods used in the Monthly Compliance Reports.</p>

Appendix C
Example Diesel-Powered Construction
Equipment Tag

Amended CECP APPROVED

EQUIPMENT HAS EPA/CARB

ENGINE CERTIFICATION ON FILE

DATE: _____

BY: _____

Appendix D
Example Air Quality Compliance Checklist

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project, Phase I

AQCMP or designee name: _____ AQCMP or designee signature: _____

Date: _____

Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily

On Going Requirements

Area Affected:	Requirement:	Implemented (Y/N):	Notes:
Construction site entrance and Travel through the site	Post visible speed limit signs of a maximum of 10 MPH for unpaved areas - identify location of signs in Site Figure Map		
Construction Eq Vehicle tires	Inspected and washed as necessary to clean off dirt prior to leaving site		
Construction entrance	Enter only through treated entrance roadways as noted on Site Map. Alternative route approved by CPM - If alternative route chosen indicated on Site Map and note rationale for change		
Unpaved roads and disturbed areas in project and laydown area	Water areas to limit visible dust. If watering is required note frequency and time in notes section of checklist		
Construction areas adjacent to any paved roadways	Provided with sandbags or other measures in SWPPP to prevent runoff, note location of measures in Site Figure Map		
Tire washing / cleaning station	Gravel ramps min 20 ft in length - identify location in Site Figure Map		
Unpaved Exits	At all exit locations: Gravel or treated to prevent track-out - <u>identify material and location in Site Figure Map</u>		
Paved Areas	Swept at least twice daily (or less during periods of precipitation during active days of construction)		
Public Roadway existing construction site	500 feet of public roadway swept visually clean at least twice daily (or less during periods of precipitation) during active construction days or when dirt is visible		
Bulk transport vehicles with materials that have potential to cause visible emissions on public	Cover or wet and load so that the trucks have at least 2 feet of freeboard		
Storage areas unactive for more than 10 days	Covered or treated with dust suppressants, and vehicle access will be restricted.		
Construction Areas that may be disturbed and are generating fugitive dust	Install wind erosions control techniques (such as gravel, windbreaks, water, chemical dust suppressants, and/or vegetation) until soil is stabilized or permanently covered w/ vegetation.		
Disturbed areas	Re-Vegetated as soon as possible		
Demolition Haul Trucks - Within the Encina Power Station Property	Travel limited to paved or graveled surfaces - Note Routes on Site Figure Map		

1 The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes will not result upon restarting the activity that caused the shut-down. The owner/operator may appeal to the CPM any directive from the AQCMM or AQCMM Delegate to shut down an activity, provided that the shutdown shall go into effect within one hour of the original determination, unless overruled by the CPM before that time.

2 The activity shall not restart until the AQCMM or AQCMM Delegate is satisfied that appropriate additional mitigation or other site conditions have changed so that visual dust plumes that could impact visibility on I-5 will not occur upon restarting the activity that caused the shut-down.

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project, Phase I

Date:

Monitoring for Visible Dust Plumes with the potential to be transported off the project site:

Definition of Areas	Requirement	Specific Location / Area:
<i>Identify Area</i>	200 feet beyond the centerline of the construction of linear facilities	
<i>Identify structures</i>	within 100 feet upwind of any regularly occupied structures	
<i>Identify distance / marker</i>	50 feet upwind of I-5	

Reduce visible dust plumes to comply with CEC COC AQ-SC4 (with the exception of visible emissions within 50 feet upwind of the I-5 freeway)

Area Affected / Source:	Mitigation Measure Implemented:	Date / Time Identified:
Step 1: Within 15 minutes of making such a determination, require more intensive application of existing method - such as additional soil wetting		
Step 2: If Step 1 fails to result in adequate mitigation within 30 minutes of the original determination, apply additional measures such as application of soil stabilizers, visqueen, or a geotech fabric.		
Step 3: If Steps 1 and 2 fail to result in effective mitigation within 1 hour of the original determination, the AQCOMM or AQCOMM Delegate shall direct a temporary shutdown of the activity causing the emissions. ¹		

Reduce visible dust plumes to comply with CEC COC AQ-SC4 within 50 feet upwind of the I-5 freeway

Area Affected / Source:	Mitigation Measure Implemented:	Date / Time Identified:
Step 1: Immediately cease the activities causing the visible dust plumes if any obscuration of visibility is occurring to drivers on I-5. Direct more intensive application of the existing mitigation methods immediately if the visible plumes are seen within 50 feet of I-5 but are not causing obscuration of visibility to drivers.		
Step 2: Direct implementation of additional methods for dust suppression and monitor the start-up and/or continuation of the dust causing activities to ensure that the additional mitigation is effective.		
Step 3: Direct a temporary shutdown of the activity causing the emissions if Step 2 specified above fails to result in effective mitigation. ²		

SAMPLE

Air Quality Construction Mitigation Plan for the Carlsbad Energy Center Project

AQCMP or designee name: _____ AQCMP or designee signature: _____

Date: _____

Air Quality Construction Mitigation Manager or Designee to Complete Checklist Daily

On Going Diesel Requirements	Checklist Criteria:	Response:	Notes:
Update Equipment Inventory List	Equipment Updated (Y/N/NA):		
Confirm all equipment are ARB tagged on both sides and tags are visible.	Tags Visible (Y/N):		
Make sure CEC approval tag is located on all equipment used onsite	Tags Visible (Y/N):		
Documentation of acceptable engine tier is on file.	Equipment Updated (Y/N/NA):		
Letter from each equipment owner is one file indicating that equipment is being properly maintained	Letters Updated (Y/N/NA):		
All diesel heavy construction equipment shall not idle for more than 5 minutes, to the extent practical. Vehicles that need to idle as part of their normal operation (such as concrete trucks) are exempted from this requirement. Note equipment needed to idle longer than 5 min as part of normal operation in the notes section of this checklist.	Idling Limited:(Y/N)		
A list of all other actions taken to control diesel construction related emissions	Other Reductions:		

Sample

Appendix E
Example Monthly Compliance Report Format

Example Air Quality Construction Compliance Summary

Amended Carlsbad Energy Center Project

PREPARED FOR: Cabrillo Power I LLC

DATE: Month Year

COMPLIANCE PERIOD: Month Year

This compliance memorandum summarizes the activities conducted in Month / Year to demonstrate compliance with the Air Quality Construction Mitigation Plan (AQCMP) for Phase IV of the Amended Carlsbad Energy Center Project (Amended CECP). The compliance status for the items identified in this report are summarized herein and on a monthly basis based on notes from daily monitoring checklists.

Fugitive Dust Compliance Measures

For this compliance period during Phase IV of the Amended CECP the following compliance measures are being implemented and monitored onsite using a compliance checklist:

- Observance of a visible dust plume (Yes or No)
- Complaints filed with the San Diego Air Pollution Control District (Yes or No)
- Deviations from the AQCMP (Yes or No)

Table 1 summarizes the fugitive dust control measures prescribed in the AQCMP monitored via daily checklists (checklists provided as Attachment A to this report). The location of speed limit signage and track-out best management practices are depicted in Figure 1.

TABLE 1
Fugitive Dust Control Measures
AQCMP 07-AFC-06C

Implementation Measure	Out of Compliance Trigger	In Compliance Trigger ^a	Results During Compliance Period
Post Visible Speed Limit Signs Limiting Speed to 10 MPH	No – No Signs Posted	Yes – Signs Posted	
Wheel Inspection and Wash Stations in Place	No - Track-Out into Roadways Not Managed	Yes - No Track-Out Observed	
Entrance and Exit Limited to Treated Roadways	No – Entrance and Exit Not Limited	Yes - Entrance and Exit Limited	
Dust Controlled from Disturbed Areas	No - Dust Plumes Originating from Active Construction/Demolition Areas	Yes – No Dust Plumes Originating from Active Construction/Demolition Areas	
SWPPP Implemented	No – SWPPP Not Implemented for Activities Near Roadways	Yes – SWPPP Implemented for Activities Near Roadways	
Track-Out Controlled with Gravel Ramps, truck pads or Treatment for Unpaved Exits	No – Dirt Entering Roadways	Yes - No Dirt Entering Roadways	

TABLE 1
Fugitive Dust Control Measures
AQCMP 07-AFC-06C

Implementation Measure	Out of Compliance Trigger	In Compliance Trigger ^a	Results During Compliance Period
Paved Area of Site Swept at Least Twice Daily	No - Dirt / Debris Accumulated	Yes – Site Clean	
Dirt Visible on Public Roadways is Swept Clean	No – Visible Dirt within 500’ of Roadway Entrance	Yes - No Dirt Observed	
Material Transferred Offsite is Covered, Treated and Loaded in Accordance with AQCMP	No – Visible Plumes from Material Transfer	Yes – No Visible Plumes from Material Transfer	
During Encina Power Station Demolition, haul trucks traveled on paved or graveled surfaces at all times within the boundary of the Encina Power Station property	No- Haul trucks traveled on unpaved dirt roads with no emission controls	Yes – Haul trucks traveled on paved or graveled surfaces	
Inactive Storage Areas are Treated	No – Dust Plumes Originating from Storage Areas	Yes - No Dust Plumes from Storage Areas	
Visible Dust Plumes Identified	No - Plume Identified and Not Controlled	Yes - Either No Plume Identified or Plume Identified and Controlled	

^a Site is noted as in compliance if the activity did not occur during the compliance period.

Diesel Equipment Compliance Measures

For this compliance period the following compliance measures are being implemented:

- List of compliance measures implemented per the approved AQCMP during the compliance period.

Equipment onsite and used for ten (10) days or more during this compliance period are being recorded and are listed in Table 2. Documentation confirming that equipment used for ten (10) days or more during Phase IV activities are the appropriate Tier, along with the appropriate letter from the equipment owner confirming maintenance is performed as required for the equipment listed in Table 2 are included as Attachment B to this report.

