

**Condition 35****Construction Activity Management Plan**

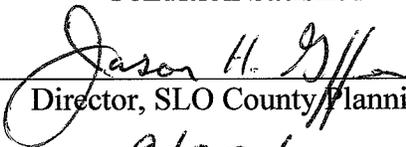
Prior to commencement of grading activities, the applicant shall submit a Construction Activities Management Plan for the review and approval of the SLOAPCD. This plan shall include but not be limited to the following Best Available Control Technologies for construction equipment:

- a. Minimize the number of large pieces of construction equipment operating during any given period.
- b. Schedule construction related truck/equipment trips during non-peak hours to reduce peak-hour emissions and overall daily and quarterly emissions.
- c. Properly maintain and tune all construction equipment according to manufacturer's specifications.
- d. Fuel all off-road and portable diesel powered equipment including but not limited to: bulldozers, graders, cranes, loaders, scrapers, backhoes, generators, compressors, auxiliary power units, with ARB certified motor vehicle diesel fuel.
- e. All diesel construction equipment shall meet ARB's Tier 3 standard for off-road heavy duty diesel engines.
- f. All on-road heavy-duty trucks shall meet the ARB's 2007 or newer certification standard for on-road heavy-duty diesel engines.
- g. All on and off-road diesel equipment shall not be allowed to idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit.
- h. Electrify portable equipment where possible throughout the project area.
- i. All diesel powered portable equipment used shall have tier 2 or tier 3 engines and retrofitted with an ARB level 3 verified diesel emissions control strategy (VEDEC).
- j. Locate construction staging areas at least 1000 feet from sensitive receptors.

**Evidence of compliance:**

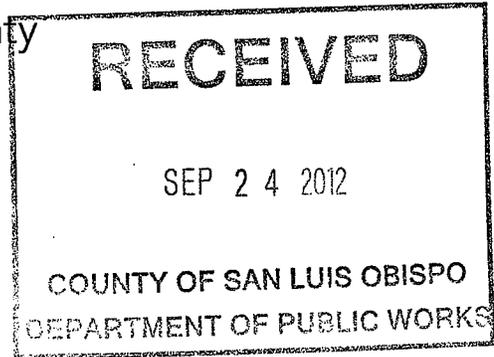
Please refer to the attached Construction Activity Management Plan (September 2012) and APCD conditional letter of approval (September 21, 2012).

**Condition Satisfied**

  
\_\_\_\_\_  
Director, SLO County Planning  
9/27/12  
\_\_\_\_\_  
Date



Air Pollution Control District  
San Luis Obispo County



September 21, 2012

Mark Hutchinson  
Department of Public Works  
County of San Luis Obispo  
County Government Center Room 207  
San Luis Obispo, CA 93408

**SUBJECT:** APCD Conditional Letter of Approval for the Los Osos Wastewater Project  
Construction Activity Management Plan

Dear Mr. Hutchinson,

We have completed our review of the draft Construction Activity Management Plan (CAMP) for the Los Osos Wastewater Project. The draft CAMP was submitted to APCD on August 29, 2012, followed by the submittal of additional required information on September 5 and 6, 2012. After our September 11, 2012 letter authorizing work to begin at the Staging Areas, APCD staff met with you to further discuss our evaluation of the CAMP. At this meeting we discussed the APCD's goal to ensure the CAMP is a correct representation of all phases of the construction project and addresses the air quality construction mitigation identified in the EIR. The purpose of this letter is to provide Public Works with a Conditional Approval to proceed with all phases of construction except the treatment plant.

Public Works and its consultants have secured construction equipment that is significantly cleaner than what is currently reflected in the emission summary tables of the CAMP. By addressing the remaining tasks needed to finalize the CAMP, the project's overall air quality impact will be more accurately represented in this document. Final APCD approval of the CAMP is pending the updates outlined in the attachment to this letter. Once completed, please submit the updated CAMP to us for our final review. It is our expectation the remaining issues can be resolved within 30 days from the start of construction.

The attachment outlines the specific aspects that need to be addressed in order to accurately represent the air quality aspects of all phases of the construction project. The purpose of the CAMP is to specifically define the air quality mitigation measures that will be employed as this project moves forward, to ensure all requirements are accounted for and implemented throughout the project. As discussed with you in meetings leading up to the submittal of the CAMP, the APCD's goal is to incorporate the necessary mitigation

measures on-site to reduce the construction project emissions below our CEQA significance thresholds.

Again, thank you for submitting the CAMP for the Los Osos Sewer Project for our review. We look forward to receiving the additional required documents. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meghan Field', written in a cursive style.

Meghan Field  
Air Quality Specialist

## Attachment

### Conditional Approval- Los Osos Wastewater Project Construction Activity Management Plan, EIR Mitigation Measure 5.9-C1 & Condition of Approval #35 and 36

Comments below highlight the necessary additions to the CAMP that are required to receive APCD approval. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

1. Updated Equipment List (COA 36)

The list of equipment that was provided to the APCD to date is incomplete. To properly evaluate the diesel emission impacts, the project proponent needs to have a complete list of all construction equipment. **Currently, the list that was provided to the APCD has several horsepower values missing. The horsepower ratings need to be identified for each piece of equipment and included in an updated equipment list spreadsheet.**

2. Odor Control Plan & Naturally Occurring Asbestos (COA 39 & 40)

APCD staff has previously worked with Public Works to complete an Odor Control Plan and Exemption Request for the Naturally Occurring Asbestos for this project; however, this information is not referenced in the CAMP. **In order for the CAMP to fully capture all air quality aspects of this project, please add a section that references the APCD approved Odor Control Plan from May 2012 and the Exemption Request for Naturally Occurring Asbestos that was granted to Public Works by the APCD on January 23, 2012. In addition to a brief summary description in the CAMP, the above mentioned documents should also be included in their entirety as attachments to the CAMP.**

3. Evaluate all Project Phases

On page 3 of the CAMP where the construction contracts are listed, two of the activities (Mid-Town Site Restoration and Drainage Improvements) are not included. These activities are also missing in the emission calculations of the Wastewater Plant. **Please ensure the Emission Summary Tables capture all phases of the Los Osos Wastewater Treatment Plant project. If Mid-Town Site Restoration and Drainage Improvements are not part of the Wastewater Treatment Plant Project they should not be referenced in the CAMP.**

4. Emission Summary Tables

For both 2013 and 2014, the emission estimates in the CAMP for every quarter throughout the year have the same value; however, the Construction Phasing Schedule that was provided as an attachment to the CAMP reflects varying activity for different quarters throughout the year. **Please update the Emission Summary Tables to ensure they are representative of what is actually occurring on the ground, rather than a "worst case scenario" for every quarter.**

5. Emission Factor Corrections to Air Quality Modeling in the Emission Summary Tables

Upon APCD's evaluation of the project using the CalEEMod air quality modeling program, it was found that the load factors for all pieces of construction equipment were incorrect. These values need to be corrected using the California Air Resources Board's 2011 updated emission factors for construction equipment. In addition, when comparing the equipment list in CalEEMod to the equipment list provided, there were a couple pieces of equipment (Loaders and scrapers in various phases of construction) that were not listed as "Tier 4 interims" in the "Construction Mitigation" section of CalEEMod. Updating these two areas in CalEEMod will significantly lower the NOx emissions associated with this project. **Please re-evaluate all project phase emissions in CalEEMod and provide updated Emission Summary Tables to reflect the changes.**

6. Hydrocarbon Contaminated Soil

**A section needs to be added that will address actions that would be taken should contaminated soil be found during the construction phase. Appropriate language could read as follows:**

- "Should hydrocarbon contaminated soil be encountered during construction activities, the APCD must be notified as soon as possible and no later than 48 hours after affected material is discovered to determine if an APCD Permit will be required. In addition, the following measures shall be implemented immediately after contaminated soil is discovered:
- Covers on storage piles shall be maintained in place at all times in areas not actively involved in soil addition or removal;
- Contaminated soil shall be covered with at least six inches of packed uncontaminated soil or other TPH -non-permeable barrier such as plastic tarp. No headspace shall be allowed where vapors could accumulate;
- Covered piles shall be designed in such a way to eliminate erosion due to wind or water. No openings in the covers are permitted;
- The air quality impacts from the excavation and haul trips associated with removing the contaminated soil must be evaluated and mitigated if total emissions exceed the APCD's construction phase thresholds;
- During soil excavation, odors shall not be evident to such a degree as to cause a public nuisance; and,
- Clean soil must be segregated from contaminated soil.

**The notification and permitting determination requirements shall be directed to the APCD Engineering Division at 781-5912.**

## **NEXT STEPS & FUTURE REQUIREMENTS**

1. Treatment Plant

The CAMP, as written and evaluated, only includes the Collection System Areas, Staging Areas and Pump Stations; it does not include air quality impacts associated with the

construction of the Treatment Plant. **Once the planning phase for this project is complete, the CAMP must be updated to include all air quality impacts and mitigation measures associated with the Treatment Plant and be submitted to the APCD for review/approval.**

2. Off-Site Mitigation (MM 5.9-C5 & COA 37, 77)

As outlined in the CAMP, even with the implementation of on-site mitigation measures, it is estimated that construction phase NOx emissions will exceed the APCD's significance thresholds of 6.0 tons per quarter. When on-site measures (including Standard Mitigation and BACT) do not bring the air quality emissions below the significance thresholds, an off-site mitigation strategy shall be developed and agreed upon by all parties. **Following the updated evaluation of the construction emission impacts, Public Works and APCD shall develop a strategy for defining the off-site mitigation. This strategy will ensure that the project's construction air quality impacts will be mitigated to a level below our significance thresholds using the most cost-effective means possible.**

3. Quarterly Reports

**A section needs to be added to include future reporting requirements. The following text could be added:**

For the duration of the construction phase for this project, the APCD shall be provided quarterly air quality emissions reports, including the actual construction fleet that will be operating, to ensure the construction activity corresponds to the information originally provided in the CAMP. Should there be any deviation from what is in the CAMP, a report should be provided to the APCD that outlines the measures that will be taken to reduce any air emissions to the level outlined in the CAMP. At the conclusion of one (1) year of project construction (following 4 quarterly reports), the APCD will look at the actual emissions versus the estimated emissions calculated for the previous year and determine if additional off-site mitigation is required. Should any additional off-site mitigation funding be required, the applicant will then work with APCD to determine the appropriate funding level.