Appendix C

Best Management Practices

APPENDIX C

Best Management Practices

This appendix describes a number of Best Management Practices (BMPs) intended to reduce the potential for short- and long-term impacts. These BMPs will be implemented during construction and operation of the White Pine Energy Station. These BMPs will be incorporated into all construction specifications and contract documents, as appropriate, and all contractors will be required to follow them. These BMPs are an integral part of the Proposed Action and Alternative 1.

Air Pollution Prevention

1. Contractors will be required to comply with all applicable federal, state, and local laws and regulations concerning prevention and control of air pollution during facility construction and operation.
2. Contractors will obtain applicable air quality permits before starting construction or operating equipment that will result in regulated atmospheric emissions.
3. Contractors will be required to implement measures to minimize dust emissions from construction operations. To accomplish this, the following measures will be implemented:
    - For the duration of construction activities, actively disturbed areas will be stabilized through the use of wet suppression as required to meet ambient air quality standards. Adequate supplies of water for dust suppression will be available such that chemical dust suppressants will not be necessary for dust control. Disturbed areas, including storage piles not being actively used for a period of 1 week or longer, will be stabilized as appropriate to minimize dust emissions. Active stabilization may not be required if soil moisture or natural crusting is sufficient to limit ambient impacts.
    - Bulk material stored onsite that is a possible fugitive dust source will be actively wetted, as needed, to minimize ambient impacts. It is anticipated that the majority of the material will be used onsite upon arrival. Should bulk materials require onsite storage for an extended period of time, the application of active wet suppression or the installation of a porous wind fence will be used as necessary to minimize fugitive dust generation.
    - Onsite fugitive dust emissions will be limited by reducing vehicle speeds and a combination of active and passive dust suppression measures. BMPs will include the following:
        - Onsite access roads, parking lots, and lay-down areas will be maintained with a gravel cover or paved to the extent practical.
        - Unpaved road segments will be watered as necessary.

- Traffic on off-site dirt roads will be restricted to the posted speed limit to minimize emissions from unpaved road segments.
- Combustion emissions from mobile sources will be minimized by proper maintenance and tune-up of equipment.

4. The project will comply with all applicable federal, state, and local laws and regulations concerning prevention and control of air pollution during facility operation. The project will receive a Prevention of Significant Deterioration (PSD) Permit prior to construction that will establish air emission rate limitations and specify air emission control technologies for facility operation.
5. Air emission sources regulated under the PSD Permit are expected to include the following:

   - Combustion sources
     - Pulverized coal boilers
     - Auxiliary boiler
     - Back-up electric generator(s)
     - Emergency diesel firewater pump
   - Non-combustion particulate matter sources
     - Cooling towers
     - Coal unloading, handling, and storage areas
     - Lime unloading, handling, and storage systems
     - Unpaved and paved roadway travel
     - Solid waste disposal facility operations
   - Liquid fuel storage sources
     - No. 2 fuel oil tank
     - Diesel fuel tanks
     - Gasoline tanks

   Air emissions from the sources listed above will be minimized through the design of these sources, use of air pollution control equipment, good combustion practices, and pollution prevention methods, all as specified in the PSD Permit.

Landscape Preservation and Impact Avoidance

1. To the maximum extent practical, all trees, native shrubs, and other vegetation will be preserved and protected during construction operations except where clearing operations are required for structures and equipment, approved construction and permanent roads, construction yards and staging areas, and excavation operations.
2. All areas around water pipelines, wells, and transmission line structures will be backfilled, compacted, and returned as close as possible to the original condition and grade.

3. Ephemeral drainages, steep slopes, or sensitive environmental areas will not be used for equipment or materials storage or stockpiling; construction staging or maintenance; field offices; hazardous material or fuel storage, handling, or transfer; or temporary access roads.

4. Excavated or graded materials will not be stockpiled or deposited on or within 100 feet of any steep slopes (defined by industry standards) or seasonally active ephemeral drainages.

5. The width of all new temporary access roads will be kept to the absolute minimum needed for operation, avoiding sensitive areas and trees where possible, and limiting disturbance to vegetation.

6. When and where applicable, landscaping standards, including clearing of native vegetation, will be followed as prescribed by local land use and management agencies when work is within their jurisdictions.

Erosion and Sediment Control

1. Planting of native grasses, forbs, trees, or shrubs beneficial to wildlife, or placing of riprap and other materials as appropriate, will be used to prevent and minimize the potential for erosion and siltation during construction of project features and during the period needed to reestablish permanent vegetative cover on disturbed sites. Sediment fences will be used where appropriate to limit wind and water erosion, and water trucks will be used in disturbed areas during construction to limit wind erosion.

2. Final erosion control and site restoration measures will be initiated as soon as practical after a particular area is no longer needed for construction, stockpiling, or access. Clearing schedules will be arranged to minimize exposure of soils.

3. Cuts and fills for access roads and utility corridors will be sloped to prevent landslides and to facilitate revegetation.

4. Signs will be placed along the access road to discourage off-road vehicle use of adjacent areas.

5. Borrow areas will be contoured and shaped to carry the natural contour of adjacent undisturbed terrain into the borrow area.

6. Soil or rock stockpiles, excavated materials, or excess soil materials will not be placed near sensitive habitats, including perennial, intermittent, and ephemeral drainages, where they may erode into these habitats or be washed away by high water or storm runoff. Plastic will be placed over stockpiles to prevent wind erosion if the stockpiles are intended to be long-term. Waste piles will be revegetated using suitable native species after they are shaped to provide a natural appearance.

7. Treading on areas not immediately involved in project construction activities will be avoided to reduce potential wind erosion and fugitive dust generated during construction.

Pipeline and Utility Corridor Construction

1. The upper 12 to 18 inches of soil will be removed from the trench area and stockpiled for later use.
2. Surface elevations will be returned to pre-project conditions, taking into account expected settling.
3. Construction activities in ephemeral washes crossed by linear features would not occur during the wet or rainy season in order to minimize or avoid the potential for short-term impacts to hydrology, vegetation, soils, and aquatic habitat for amphibians and other wildlife.
4. Where the pipeline crosses fences, a wire gate will be installed to standard BLM specifications. The gates will be built prior to the corridor construction and will be kept closed except during active construction at the fence site.
5. If construction activities cause damage to existing range improvements (such as pipelines, fences, troughs, etc.), they will be fixed using material that meets or exceeds the quality of the existing improvement. If damage occurs, the BLM and livestock operator will be notified immediately. If damage occurs during active livestock grazing, repairs will be made within 24 hours.
6. The base of guy-wires on power poles will be fenced, and the first 10 feet of guy-wires will be marked with safety reflectors, high-visibility tape or plastic, or a similar material to make them highly visible to the public and to avian and mobile terrestrial wildlife species.

Biological Resources

1. Biological resources in the project area will be evaluated and the presence of any federally-listed endangered, threatened, or candidate species noted. The U.S. Fish and Wildlife Service (FWS) will be consulted per requirements of Section 7 of the Endangered Species Act (ESA). Measures will be incorporated into the Plan of Development to avoid impacts to endangered, threatened, and candidate species and their habitats. Where such impacts cannot be avoided, the project final design, construction, and operation will include appropriate measures to minimize and mitigate impacts.
2. Bird nests encountered during land disturbing construction activities will be avoided while the birds are fledging. To the extent practical, land disturbing construction activities will be scheduled outside of the breeding season (March 15 through July 30). If construction is required during the breeding season, the area impacted will be surveyed for nests prior to construction.
3. WPEA will adhere to an integrated pest management plan prepared for the project.
4. The evaporation pond on the power plant site will be fenced to exclude access by terrestrial wildlife species. In addition, the pond liner will be textured and there will be wildlife escape ramps at regular intervals on the liner. The evaporation pond will be monitored for water quality, use by wildlife, and possible adverse effects on wildlife

resulting from exposure to potentially highly saline pond water. If necessary, measures that are designed to prevent or discourage wildlife from entering the pond will be initiated prior to when critical salinity levels are reached that could adversely impact wildlife. Examples of such measures include electronic sound devices that mimic predatory bird calls, visual scare tactics, propane noise cannons, and, in extreme cases, netting. The monitoring program and protective measures that will be implemented, if needed, will be described in the Plan of Development. The process will be completed in consultation with a BLM biologist.

5. Also refer to BMPs under Pipeline and Utility Corridor Construction and Reclamation for the protection of Biological Resources.
6. An observer will be present to visually search for and make sure no bald eagles are present in the power plant area prior to steam blowouts.
7. Biological crusts will not be disturbed if encountered.
8. Surveys for special status and BLM sensitive plant species will be conducted prior to construction and, if necessary, appropriate mitigation agreed to by WPEA and the BLM will be followed.

Cultural Resources

See the Cultural Resources Programmatic Agreement contained in Appendix O.

Paleontological Resources

1. If paleontological resources are discovered during construction, the BLM will be notified immediately and measures taken to protect the resource. A 50-meter buffer will be left around any discovery and work will not resume until authorization is given by an authorized officer. The significance of the resource will be evaluated and whether or not avoidance was possible. Stabilization and measures to mitigate construction damage might also be required even if avoidance was possible. Should avoidance prove infeasible, further procedures to protect the resource will be determined by the BLM.
2. The BLM's Paleontological Resource Management Program (BLM Manual 8720) includes the following objectives:
    - Locate, evaluate, manage, and protect, where appropriate, paleontological resources on public lands.
    - Facilitate the appropriate scientific, educational, and recreational uses of paleontological resources, such as research and interpretation.
    - Ensure that proposed land uses, initiated or authorized by the BLM, do not inadvertently damage or destroy important paleontological resources on public lands.
    - Foster public awareness and appreciation of our nation's rich paleontological heritage.

Noxious and Invasive Weed Management

1. Prior to the acquisition of non-federal lands, a noxious weed assessment will be conducted so that the BLM Authorized Officer can factor the cost of weed control into the acquisition decision.

2. A noxious weed survey will be completed prior to any earth disturbing activity including cross-country travel. Noxious or invasive weeds that may be located on the site will be managed according to methods to be approved by the BLM Authorized Officer. Should chemical methods be approved, the lessee must submit a Pesticide Use Proposal to the Authorized Officer 60 days prior to the planned application date. A Pesticide Application Report must be submitted to the Authorized Officer by the end of each fiscal year following chemical application.

3. To eliminate the introduction of noxious weed seeds, roots, or rhizomes, all straw, hay, straw/hay, or other organic products used for reclamation or stabilization activities will be certified free of plant species listed on the Nevada noxious weed list or specifically identified by the BLM Ely Field Office.

4. To eliminate the introduction of noxious weed seeds, roots, or rhizomes, all source sites such as borrow pits, fill sources, or gravel pits used to supply inorganic materials used for construction, maintenance, or reclamation will be inspected and found to be free of plant species listed on the Nevada noxious weed list or specifically identified by the BLM Ely Field Office. Inspections will be conducted by a BLM-approved weed scientist or qualified biologist.

5. To eliminate the transport of vehicle-borne weed seeds, roots, or rhizomes, all vehicles and heavy equipment used for the completion, maintenance, inspection, or monitoring of ground disturbing activities will be free of soil and debris capable of transporting weed propagules. All such vehicles and equipment will be cleaned with power or high pressure equipment prior to entering or leaving the work site or project area. Cleaning efforts will concentrate on tracks, feet or tires, and on the undercarriage. Special emphasis will be applied to axles, frames, cross members, motor mounts, on and underneath steps, running boards, and front bumper/brush guard assemblies. Vehicle cabs will be swept out and refuse will be disposed of in waste receptacles. Cleaning sites will be recorded using global positioning systems or other mutually acceptable equipment and provided to the Field Office Weed Coordinator or designated contact person.

6. Prior to entry of vehicles and equipment to a project area, areas of concern will be identified and flagged in the field by a weed scientist or qualified biologist. The flagging will alert personnel or participants to avoid areas of concern. These sites will be recorded using global positioning systems or other Ely Field Office approved equipment and provided to the Field Office Weed Coordinator or designated contact person.

7. Prior to entering public lands, the contractor, operator, or permit holder will provide information and training regarding noxious weed management and identification to all personnel who will be affiliated with the implementation and maintenance phases of the project. The importance of preventing the spread of weeds to uninfested areas and the importance of controlling existing populations of weeds will be explained.

8. To eliminate the transport of soil-borne noxious weed seeds, roots, or rhizomes, infested soils or materials will not be moved and redistributed on weed-free or relatively weed-free areas. In areas where infestations are identified or noted and infested soils, rock, or overburden must be moved, these materials will be salvaged and stockpiled adjacent to the area from which they were stripped. Appropriate measures will be taken to minimize wind and water erosion of these stockpiles. During reclamation, the materials will be returned to the area from which they were stripped.

9. Prior to project approval, a site-specific weed survey will occur and a weed risk assessment will be completed. Monitoring will be conducted for a period no shorter than the life of the permit or until bond release and monitoring reports will be provided to the BLM. If the spread of noxious weeds is noted, appropriated weed control procedures will be determined in consultation with BLM personnel and will be in compliance with the appropriate BLM Handbook sections and applicable laws and regulations. All weed control efforts on BLM-administered lands will be in compliance with BLM Handbook H-9011, H-9011-1 Chemical Pest Control, H-9014 Use of Biological Control Agents of Pests on Public Lands, and H-9015 Integrated Pest Management. A pesticide Application Report must be submitted to the Authorized Officer by the end of the fiscal year follow chemical application.

10. For mineral activity, bonds for weed control will be retained until the site is returned to desired vegetative conditions.

11. Removal and disturbance of vegetation will be kept to a minimum through construction site management (for example, using previously disturbed areas and existing easements, limiting equipment/materials storage and staging area sites, etc.)

12. Mixing of herbicides and rinsing of herbicide containers and spray equipment will be conducted only in areas that are safe distance from environmentally sensitive areas and points of entry to bodies of water (storm drains, irrigation ditches, streams, lakes, or wells).

13. Methods used to accomplish weed and insect control objectives will consider seasonal distribution of large wildlife species.

Reclamation

1. Reclamation will normally be accomplished with native species only. These will be representative of the indigenous species present in the adjacent habitat. Rationale for potential planting with selected non-natives will be documented. Possible exceptions could include use of non-natives for a temporary cover crop to out-compete weeds.

2. Seeding will occur during October 15 through March 15 to ensure a greater chance of success.

3. Reclamation release criteria are as follows:

    - Achieve 100 percent of the perennial plant cover of selected comparison areas, normally like adjacent habitat. If the adjacent habitat is severely disturbed, a range site description may be used as a cover standard. Cover is normally crown cover as

estimated by the point intercept method. Selected cover can be determined using a method as described in *Sampling Vegetation Attributes, Interagency Technical Reference* (1996, BLM/RS/ST-96/002+1730). The reclamation plan for the project area will identify the site-specific release criteria and associated statistical methods in the reclamation plan or permit.

- No noxious weeds will be allowed on the sites for reclamation release. Control of noxious weeds will follow an integrated pest management plan approved by the authorizing officer. A list of Nevada noxious weeds will be provided by the authorized officer.

4. Up to the first 12 to 18 inches of growth medium will be salvaged and stockpiled prior to disturbance for all areas to be reclaimed after construction. All disturbance areas to be reclaimed will be recontoured to blend as nearly as possible with the natural topography prior to revegetation. All compacted portions of the disturbance will be ripped to a depth of 12 inches unless solid rock is encountered. Adequate, fine-grain seedbed must be established to provide good seed to soil contact. Large blocks and clumps of soil with deep pockets should be avoided. This normally requires some type of tillage procedure after ripping.

5. All portions of access roads not needed for other uses as determined by the authorized officer will be reclaimed.

6. Mulching of the seedbed following seeding may be required under certain conditions, such as severe erosion.

7. The success of the vegetative growth on a reclaimed site may be evaluated for release no sooner than during the third growing season after earthwork and planting have been completed. Where it has been determined that revegetation success criteria have not been met, the agencies and the operator will meet to decide on the best course of actions necessary to meet the reclamation goal.

8. Where applicable, the following agencies will be consulted to determine the recommended plant species composition, seeding rates, and planting dates:

   - U.S. Fish and Wildlife Service (FWS)
   - U.S. Natural Resources Conservation Service (NRCS)
   - U.S. Bureau of Land Management (BLM)

9. Grasses, forbs, shrubs, and trees appropriate for site conditions and surrounding vegetation will be included on the plant list. Species chosen for a site will be matched for site drainage, climate, shading, resistance to erosion, soil type, slope, aspect, and vegetation management goals. Upland revegetation shall match the plant list to the site's soil type, topographic position, elevation, and surrounding natural communities.

10. Construction areas, including storage yards, will be free of waste material and trash accumulations at all times, unless stored in appropriate containers.

11. All unused materials and trash will be removed from construction and storage sites during the final phase of work. All removed material will be placed in approved sanitary landfills or storage sites and work areas will be left to conform to the natural landscape.

12. Upon completion of construction, any land disturbed will be graded to provide proper drainage and blend with the natural contour of the land. Following grading, it will be revegetated using plants native to the area, suitable for the site conditions, and beneficial to wildlife.

13. Following completion of construction, all yards, offices, and construction buildings, including concrete footings and slabs, will be removed from the site.

14. All temporary construction roads will be obliterated and restored to the original contour, and made to discourage vehicular traffic when no longer needed by contractors. Culverts will be removed as appropriate, road escarpments will be contoured and vegetated, and all road surfaces will be scarified to establish conditions appropriate for reseeding, drainage, and erosion prevention.

Visual Resources

1. All outside surfaces of structures, stacks, buildings, and tanks will be constructed of materials that will restrict glare, and will be finished with flat tones intended to blend with the surrounding predominantly rural environment. WPEA will consult with White Pine County and BLM regarding the final selection of colors for the features of the property.

2. All fencing will be constructed of non-reflective materials, and will be treated or painted to blend with the surrounding environment.

3. Signs at the plant site will be constructed of materials that are non-glare, and will be painted using unobtrusive colors. This requirement shall not apply to safety signs (for example, brightly colored signs indicating the presence of a hazard.)

4. Outdoor lighting will be limited to areas required for operations, maintenance, safety and security, and will be shielded and directed downward to the extent possible. Highly directional, high-pressure sodium vapor fixtures (or other fixtures that meet the criteria specified) will be used where practical. Switches will be used as appropriate on outdoor lighting to allow use of lighting only when needed. Lighting techniques will include using directional lights that do not allow lights to shine into the sky, screening lights, using timers and motion detectors so that lights are only on when necessary, and designing a lighting system than minimizes lighting to only meet functional requirements.

5. The transmission structures will be finished with flat, neutral gray tones that will relate to the colors of the structures in the existing transmission corridors and that will blend with the surrounding environment.

6. Non-specular conductors and non-reflective and non-refractive insulators will be used to reduce conductor and insulator visibility.

7. Also refer to BMP No. 5 under Pipeline and Utility Corridor Construction for Visual Resources guidelines.

Water Pollution Prevention and Monitoring

1. Water needs during facility operation (up to 5,000 acre-feet annually) will be supplied through water rights that have been permitted under application Numbers 45834 through 45855 and are held by White Pine County. Water needs during facility construction will be supplied by one or more of the project's permitted wells or transported by truck from other local water sources.

2. A ground water monitoring program will be developed by WPEA in cooperation with the Nevada State Engineer. Results of monitoring will be provided to the BLM and the Nevada State Engineer annually to evaluate the effects of the withdrawal of ground water resources in accordance with Condition 3 of the water rights permits.

3. Pumped ground water will be monitored periodically (as stipulated in the final Construction, Operation, and Maintenance Plan) to ensure its quality is suitable for power plant operation, including its use as potable water supplies for plant employees, boiler feedwater makeup, cooling water makeup, pollution control, and other beneficial uses to support the operation of the facility.

4. All federal and state laws related to control and abatement of water pollution will be complied with. All waste material and sewage from construction activities or project-related features will be disposed of according to federal and state pollution control regulations.

5. All disturbed drainages will be reclaimed as soon as practical, to a standard for aesthetic value comparable to what existed prior to disturbance. Where appropriate, native species capable of bank stabilization will be used to revegetate all disturbed banks.

6. Diversion structures will be used to re-direct flows from any drainages potentially impacted by facility features and will be designed to minimize potential destabilization and erosion of adjacent and downgradient drainages.

7. Stormwater management plans will be implemented for project construction and facility operation to minimize and control erosion from stormwater runoff. During project construction, stormwater will be managed in compliance with applicable state and federal regulations, including compliance with requirements of the National Pollutant Discharge Elimination System (NPDES) stormwater general permits, which will be obtained for the project. Stormwater management elements will include:

    - Application of best management practices for erosion, sedimentation, and stabilization control during construction activities, and management of oils and other substances during operation to minimize contact with stormwater

    - Structural controls during operation that could include stabilized stormwater conveyance systems (swales), oil-water separators for runoff that comes in contact with affected plant site surfaces, and sedimentation detention basins

    - Monitoring and maintenance to ensure long-term effectiveness of the management system.

8. One or more stormwater retention basins will be constructed with sufficient dimensions to accommodate runoff from the impervious surfaces at the plant site generated by the local maximum daily rainfall event with a return frequency of 100 years or less. All runoff from the impervious surfaces will be directed to the retention basin(s) prior to being released to the natural drainage system at flow rates equivalent to pre-development conditions. Stormwater runoff likely to contain contaminants will flow first to onsite treatment facilities (such as an oil-water separator), as appropriate, prior to being directed to the stormwater retention basin(s).

9. Construction specifications will require construction methods that prevent pollutants from accidentally entering or spilling into flowing or dry watercourses, and ground water sources. Potential pollutants and wastes include refuse, garbage, cement, concrete, sewage effluent, industrial waste, oil and other petroleum products, aggregate processing tailings, mineral salts, drilling mud, and thermal pollution.

10. A detailed containment plan will be developed and included in the Plan of Development for the disposal of drilling mud and test-drilling water associated with and removed during the drilling of ground water wells.

11. Any construction wastewater discharged into surface waters will be essentially free of settling material. Wastewater from aggregate processing, concrete batching, or other construction operation will not enter drainages without water quality treatment. Turbidity control methods may include settling ponds; gravel-filter entrapment dikes; recirculation systems for washing aggregates; or other approved methods.

12. Appendix I contains a ground water monitoring program.

Noise Prevention

1. The facility will be designed to operate in compliance with all applicable federal, state, and local laws and regulations related to noise.

2. Contractors will be required to comply with all applicable federal, state, and local laws and regulations concerning prevention and control of noise during project construction and operation.

Hazardous Material Storage, Handling, and Disposal and Safety Measures

1. Contractors will be required to comply with Nevada State Regulations established under the authority of the Federal Resources Conservation and Recovery Act of 1976.

2. “Hazardous material” means any substance, pollutant, or contaminant that is listed as hazardous under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 USC 9601 et seq., and its regulations (CERCLA). The definition of hazardous substances under CERCLA includes any “hazardous waste” as defined in the Resource Conservation and Recovery Act of 1976 (RCRA), as amended 42 USC 6901 et seq., and its regulations. The term hazardous materials also includes any

nuclear byproduct material as defined by the Atomic Energy Act of 1954 as amended, 42 USC 2011 et seq.

3. As necessary, process wastewater solid precipitant will be transported for disposal at a licensed landfill. Solid precipitant stored onsite will be covered until transported for disposal.

4. Aboveground chemical tanks will be located within a containment structure that is paved and bermed, and that is sufficient to contain a release from the largest tank within the area, plus sufficient freeboard to prevent overflow. Tanks will be registered, constructed, and managed using accepted engineering best practices, which may include high-level alarms or indicators to prevent overflow and locking valves. Tanks will be subject to a regular inspection regime (as stipulated in the final Construction, Operation, and Maintenance Plan).

5. The potential for adverse impacts from oil and fuel spills will be reduced through careful handling and designation of specific equipment repair and fuel storage areas.

6. Outdoor oil storage areas will be bermed with a capacity sufficient to contain the oil inventory contained in the single largest tank/equipment plus sufficient freeboard to prevent overflow. These areas will be equipped with a normally locked valve. Regular inspections will determine if there had been a leak requiring special attention. Otherwise, the valve will be opened to drain any rainwater to a plant oil/water separator. Any oil collected in the separator will be pumped out and removed by a licensed oil disposal contractor.

7. Outdoor chemical and hazardous waste storage areas will be within diked containment areas. Chemicals and wastes will be stored in accordance with the fire safety, hazardous materials management, and hazardous waste management standards of practice, which include segregation of incompatibles, protection of water-reactive materials from precipitation or moisture, adequate aisle space, etc.

8. Waste materials known or found to be hazardous will be disposed of in approved treatment or disposal facilities in accordance with federal, state, and local regulations, standards, codes, and laws.

9. Solid waste will be stored in onsite roll-off bins. Recyclable materials will be separated from the solid waste stream. Solid waste will be collected periodically and transported to a local licensed landfill.

10. Generation of wastes during construction will be minimized through detailed estimating of materials needed and through efficient construction practices. Any wastes generated during construction will be recycled as much as feasible. Concrete waste will be used as fill onsite, or, if not suitable for reuse, will be removed to a local licensed landfill. Any nonrecyclable wastes will be collected and transported to a local licensed landfill.

11. Fuels, lubricant chemicals, and welding gases used during construction will be in controlled storage until used. Any empty containers or waste material will be segregated in storage and properly recycled or disposed of by licensed handlers.

12. Concrete trucks will not be washed at construction sites along utility corridors. Concrete trucks may be washed at designated locations on the power plant site. All spilled concrete will be removed from construction areas and disposed of properly.

13. Portable toilets will be provided for onsite sewage handling during construction. Sewage from the portable toilets will be removed regularly and disposed of in accordance with applicable federal and state pollution control regulations. During facility operation, sewage from plant employees will be collected and treated using an on-site septic system.

14. A Spill Prevention Control and Countermeasures Plan (SPCCP) will be put in place for project features and include the following:

    - Program components and assignments
    - Professional engineer certification
    - Site information
    - Site drainage and storm water management
    - Emergency procedures/spill response
    - Emergency reporting contacts
    - Tank schematics
    - Material safety data sheets
    - Management approval
    - Plans reviews and amendments
    - Personnel training
    - Reporting procedures/emergency reporting contacts
    - Site inspections
    - Notice to tank truck drivers
    - Spill, fire, and safety equipment

15. Operators of the White Pine Energy Station will provide first response fire and emergency medical equipment and services for the project. The operators will also coordinate with local police, fire, and ambulance districts to provide additional personnel and services to the project.

16. To minimize the exposure of personnel and equipment to potential flood hazards, construction activities in or immediately adjacent to drainages will be scheduled to occur when the probability for flash flooding is minimal.

Socioeconomics

1. WPEA will provide funding for the additional resources, if needed, that will be identified by White Pine County so that there are no interim service deficiencies.

2. Security-related BMPs included as part of the plant site development will include an onsite security office to provide space and facilities for security personnel, a guardhouse for security personnel at the entrance to the power plant site, security fencing around the power plant site, and security vehicles to patrol the site.

3. Speed limit and caution signs will be placed near construction sites and access routes.

4. Traffic control personnel will be employed at road crossings and construction access ingress and egress sites to minimize the potential increase in demand for sheriff patrols and reduce the need for issuing speeding tickets.
5. To support the effectiveness of first responders, the plant site will have extra water storage for firefighting effort that might be necessary prior to the arrival of firefighting personnel from McGill or Ely. Backup diesel generators and pumps, water trucks, and other equipment will also be maintained and kept on the plant site.
6. The plant site will incorporate a wide range of safety features to minimize the risk of injury that could require medical attention including:
    - Public access to the power plant site will be restricted through the use of fencing and security gates
    - The power plant will be equipped with fire suppression systems
    - Industry-recognized BMPs will be implemented to minimize fire safety risks