

2.11 EMISSIONS CONTROL

***WAC 463-42-225 Proposal -- Emission control.** The applicant shall demonstrate that the highest and best practicable treatment for control of emissions will be utilized in facility construction and operation. In the case of fossil fuel power plants, petroleum refineries, and transmission and associated facilities, the applicant should deal with products containing sulphur, NO_x, volatile organics, CO, CO₂, aldehydes, particulates, and any other emissions subject to regulation by local, state, or federal agencies. In the case of a nuclear-fueled plant, the applicant should deal with optional plant designs as these may relate to gaseous emissions.*

Pursuant to WAC 463-42-115, the Applicant requests a waiver of the information required by WAC 463-42-225 for operation, which calls for a demonstration that the highest and best practicable treatment for control of emissions will be utilized. The only air emissions arising from the Project will be vehicle and construction equipment emissions during construction. No air emissions will be generated from operation of the Project, as the operation of wind turbine generators does not involve the combustion of any fuels. The Project area is located outside of any air quality non-attainment areas, according to Washington Department of Ecology.

2.11.1 Construction

During construction of the Project, the use and operation of construction equipment and vehicles will result in minor air emissions. The main sources of these emissions are expected to be:

- Earth moving equipment for road construction and site preparation
- Excavating equipment for turbine foundation excavation
- Transport vehicles for delivery of construction materials and equipment
- Worker vehicles
- Small electric generators for on-site power during construction

The primary types of air emissions are expected to be those typically associated with internal combustion engines, e.g. carbon dioxide, nitrogen oxides, sulfur oxides, carbon monoxide and particulate matter.

2.11.2 Mitigation

All construction and operations vehicles and equipment will comply with all applicable state and federal emissions standards. Applicant will instruct the contractors to minimize the idling of engines when not in active use to minimize emissions. Applicant will encourage carpooling among construction workers to further minimize emissions.

As the construction equipment and vehicles will be dispersed across a large, sparsely populated area, no impacts to surrounding residences are anticipated. The construction will take place for a limited duration (approximately one year), therefore total construction emissions will be relatively minor and environmental impacts will be insignificant. The air emissions that will be displaced by the operation of the Project (that would otherwise be generated by an equivalent fossil-fuel power plant) will outweigh the air emissions generated during construction by several orders of magnitude.