

Appendix D

Record of Non-Applicability and Air Quality Data

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UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS WEST-MARINE CORPS BASE
BOX 555010
CAMP PENDLETON, CALIFORNIA 92055-5010

5090
ENV/PLN

MEMORANDUM FOR THE RECORD

From: Commanding General
To: Director, Environmental Security

Subj: RECORD OF NON-APPLICABILITY (RONA) FOR NEPA xxxxxx; SANTA MARGARITA RIVER CONJUNCTIVE USE PROJECT, MCB CAMP PENDLETON, DET FALLBROOK, AND COMMUNITY OF FALLBROOK, CALIFORNIA

Ref: (a) U.S. Environmental Protection Agency, Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule, published in the Federal Register on 30 November 1993 (40 CFR Parts 6, 51, and 93)
(b) U.S. Environmental Protection Agency, Revisions to the General Conformity Regulations; Final Rule, published in the Federal Register on 5 April 2010 (40 CFR Parts 51 and 93)
(c) OPNAVINST 5090.1C (Appendix F)

Encl: (1) Santa Margarita River Conjunctive Use Project Emissions Analysis for Clean Air Act Conformity Applicability

1. References (a), (b), and (c) provide implementing guidance for documenting Clean Air Act (CAA) Conformity Determination requirements. The General Conformity Rule applies to federal actions proposed within areas which are designated as either non-attainment or maintenance areas for a National Ambient Air Quality Standard (NAAQS) for any of the criteria pollutants.

2. The Proposed Action would occur within the San Diego Air Basin (SDAB) at DET Fallbrook and the community of Fallbrook, California, and the San Diego Air Basin (SDAB) portion of Marine Corps Base Camp Pendleton. This portion of the SDAB is currently in non-attainment of the 8-hour ozone (O₃) NAAQS and is a maintenance area for carbon monoxide (CO) NAAQS. The SDAB is in attainment of the NAAQS for all other criteria pollutants. Therefore, only project emissions of CO and O₃ (or its precursors, volatile organic compounds [VOCs] and oxides of

Subj: RECORD OF NON-APPLICABILITY (RONA) FOR NEPA 20080315;
SANTA MARGARITA RIVER CONJUNCTIVE USE PROJECT, MCB
CAMP PENDLETON, DET FALLBROOK, AND COMMUNITY OF
FALLBROOK, CALIFORNIA

nitrogen [NO_x]) were analyzed for conformity rule applicability. The annual *de minimis* threshold levels for this region are 100 tons of VOC, NO_x, and CO. Federal actions may be exempt from conformity determinations if they do not exceed designated *de minimis* threshold levels.

3. An emissions analysis for the Santa Margarita River Conjunctive Use Project is presented in the enclosure. *De minimis* thresholds for applicable criteria pollutants would not be exceeded as a result of implementation of the Proposed Action and a formal Conformity Determination is not considered necessary.

4. To the best of my knowledge, the information presented in this RONA is correct and accurate, and I concur in the finding that implementation of the Proposed Action does not require a formal CAA Conformity Determination.

VINCENT A. COGLIANESE

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Table A-4
 Santa Margarita River Conjunctive Use Project
 Operational Maintenance Activities
 Heavy Equipment Emissions

Operational Maintenance Activities (All1, All2)		Emission Factors, g/bhp-hr										No of Equipment		Hrs/day		Months		Emissions, lbs/day										Emissions, tons/year									
	Fuel	HP	Load Factor	CO	VOC	NOx	SOx	PM10	PM2.5	CO2	CH4	N2O			CO	VOC	NOx	SOx	PM10	PM2.5	CO2	CH4	N2O	CO	VOC	NOx	SOx	PM10	PM2.5	CO2	CH4	N2O					
				57	2.19	0.99	6.15	0.006	0.229	0.204	568.3	0.053	0.584	1	4	1	1.85	0.50	5.19	0.01	0.19	0.17	479.91	0.04	0.49	0.02	0.01	0.07	0.00	0.00	6.24	0.00	0.01				
				55	4.07	1.19	7.16	0.007	0.654	0.582	568.3	0.108	0.680	1	4	1	2.13	0.62	3.75	0.00	0.34	0.30	297.69	0.06	0.36	0.03	0.01	0.05	0.00	0.00	3.87	0.00	0.00				
															3.98	1.12	8.94	0.01	0.54	0.48	777.60	0.10	0.85	0.05	0.01	0.12	0.00	0.01	10.11	0.00	0.01						

Table A-5
Santa Margarita River Conjointive Use Project
Operational Maintenance Truck Emissions

Vehicle Class	No. of Trucks Per Construction Phase	Speed (mph)	VMT (mi/vehicle day)	CO		NO _x		VOC		SO _x		PM10			PM2.5			CO ₂		CH ₄	Emissions, lbs/day																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
				Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)	Running Exhaust (g/mi)	Exhaust (g/mi)		Running Exhaust (g/mi)	Exhaust (g/mi)	CO	NO _x	VOCs	SO _x	PM10	PM2.5	CO ₂	CH ₄																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																
heavy-duty truck	15	27	40	6.303	17.209	1.262	0.019	0.713	0.036	0.028	0.656	0.009	0.012	1992.669	0.059	8.34	22.76	1.67	0.03	1.03	0.90	2635.86	0.08																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																							

Emissions, tons/year						
CO	NO _x	VOCs	SO _x	PM10	PM2.5	CH ₄
0.13	0.34	0.03	0.00	0.02	0.01	39.54
						0.00

Emission Factors from EMFAC2007, Year 2009, 60 F, 27 mph

Unpaved Road Emissions
 $E = k(s/12)^a(w/3)^b$
 Assume $s = 8.5$
 Assume $W = 10$
 Assume 5 miles of travel per vehicle per day
 Emission Factor
 Control Efficiency
 Emissions, lbs/day
 Emissions, tons/year

	PM10	PM2.5
k	1.5	0.15
a	0.9	0.9
b	0.45	0.45
1.890604	0.18906	
61%	61%	
55.30017	5.530017	
0.829503	0.08295	

Table A-6
Santa Margarita River Construction Use Project
Operational Worker Vehicle Emissions

Construction Phase	Vehicle Class	No. of Workers Per Construction Phase	Speed (mi/hr)	CO		NO _x		VOCs				SO _x		PM ₁₀				PM _{2.5}				CO ₂		CH ₄		Emissions, tons/year										
				Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Hot-Soak (g/trip)	Resting Loss (g/hr)	Running Evaporative (g/hr)	Diurnal Evaporative (g/hr)	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Tire Wear (g/mi)	Brake Wear (g/mi)	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Tire Wear (g/mi)	Brake Wear (g/mi)	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	Running Exhaust (g/mi)	Start-Up Exhaust (g/start)*	CO	NO _x	VOCs	SO _x	PM ₁₀	PM _{2.5}	CO ₂	CH ₄			
Maintenance Light-duty truck, 1 gallon/gal	50	33	2.924	11.289	0.284	0.56	0.055	0.816	0.183	0.024	0.047	0.054	0.004	0.002	0.013	0.016	0.008	0.013	0.011	0.014	0.002	0.005	399.538	203.967	0.027	0.046	14.14	1.31	0.65	0.02	0.15	0.08	1794.15	0.12		
Assume starting after 8 hours																																				
Assume 45 minutes run time																																				
2009 Emission Factors from																																				
			Emissions, tons/year		CO		NO _x		VOCs		SO _x		PM ₁₀		PM _{2.5}		CO ₂		CH ₄																	
					0.21		0.02		0.01		0.00		0.00		26.76		0.00		0.00																	