

**DEPARTMENT OF DEFENSE
DEPARTMENT OF THE NAVY**

**CLEAN AIR ACT - GENERAL CONFORMITY RULE
RECORD OF NON-APPLICABILITY (RONA)**

**For
REALIGNMENT AND DEVELOPMENT OF A WEAPONS SURVIVABILITY
COMPLEX**

**NAVAL AIR WEAPONS STATION (NAWS)
CHINA LAKE, CALIFORNIA**

Summary

Projected air emissions associated with the proposed action are below *de minimis* levels, are not regionally significant, and do not require further conformity analysis.

1.0 Introduction

The Clean Air Act (CAA) as amended requires federal actions to conform to an approved state implementation plan (SIP). The SIP is designed to achieve or maintain an attainment designation for air pollutants as defined by the National Ambient Air Quality Standards (NAAQSs). The General Conformity Rule (40 CFR Parts 51 and 93) implements these requirements for Federal actions occurring in air quality non-attainment and maintenance areas.

The CAA designates six pollutants as criteria pollutants for which NAAQSs have been promulgated to protect public health and welfare: particulate matter (PM₁₀ and PM_{2.5}), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead (Pb), and ozone (O₃). Areas that do not meet NAAQSs are designated as “non-attainment” for those criteria pollutants exceeding their respective NAAQS. Non-attainment status is further classified by the extent to which the standard is exceeded. There are six classifications of ozone non-attainment status—transitional, marginal, moderate, serious, severe, and extreme; and two classifications of CO and PM₁₀ non-attainment status—moderate and serious. An area which has been redesignated from non-attainment to attainment is referred to as a “maintenance” area.

The activities proposed under this action at NAWS are located in Kern County and San Bernardino County, California, within the Kern County Air Pollution Control District (APCD), and the Mojave Desert Air Quality Management District (AQMD), respectively. The Mojave Desert AQMD portion of NAWS has been designated by the United States Environmental Protection Agency (USEPA) as attainment for the PM_{2.5} and 8-hour O₃ standards, and non-attainment for the PM₁₀ standard. The Kern County APCD portion of NAWS is also in attainment for the PM_{2.5} and 8-hour O₃ standards, and is a maintenance area for the PM₁₀ standard. While the NAWS is in attainment for the 8-

hour O₃ standard, it was previously a maintenance area with respect to the 1-hour O₃ standard. Therefore, this analysis will include the O₃ precursors of NO_x and VOCs to ensure this action will not interfere with statewide O₃ standard implementation efforts.

A Federal action is exempt from applicability of the General Conformity Rule requirements if the action's total net emissions are below the *de minimis* levels specified in the rule (see Table 1) and are not regionally significant (i.e., the emissions represent 10 percent or less of a non-attainment or maintenance area's total emission inventory of that pollutant), that are not otherwise exempt per 40 CFR 51.153. Total net emissions include direct and indirect emissions from all stationary point and area sources, construction sources, and/or mobile sources caused by the federal action that are not covered by another permitting program. To determine if an exemption is applicable to this action, emissions of PM₁₀ were evaluated.

Table 1 De Minimis Levels for Exemption from General Conformity Rule Requirements for Ozone and Particulate Matter (Tons/Year)

Pollutant	Tons/Year
O₃ (Volatile organic compounds [VOCs] or Nitrogen oxides [NO_x])	
Serious non-attainment areas	50
Severe non-attainment areas	25
Extreme non-attainment areas	10
Marginal and moderate O₃ non-attainment and O₃ maintenance areas outside an O₃ transport region	
VOCs	100
NO _x	100
Marginal and moderate O₃ non-attainment and O₃ maintenance areas inside an O₃ transport region	
VOCs	50
NO _x	100
Particulate Matter	
Moderate non-attainment and maintenance areas	100
Serious non-attainment areas	70

Source: 40 CFR 51.

¹ Ozone does not occur directly from any source, but results from a series of reactions between oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) in sunlight. Therefore, *de minimis* levels of NO_x and VOCs are used to determine exemption from the General Conformity Rule for emissions that would affect ozone levels in an area of non-attainment for ozone.

2.0 Proposed Action

The Proposed Action is in response to the BRAC Commission of 2005 recommendations for the realignment of fixed-wing related Live Fire Testing & Evaluation (LFT&E) to NAWS China Lake. This recommendation would result in the realignment of the following activity to NAWS China Lake:

- Wright Patterson AFB Ohio, LFT&E.

This action is specific to construction and operation of facilities on NAWS China Lake.

3.0 Projected Air Emissions

Air emissions from the Proposed Action would be those associated with construction of the facilities and then operation of the buildings, increased privately owned vehicle (POV) use, ordnance detonation, and aircraft testing. Construction activities for BRACON P-700V are expected to begin in FY 2009 and continue through FY 2010. Construction activity will include demolition, site preparation, road widening, new buildings, new parking lots, new sidewalks, and a test pad. These emissions were calculated for each year of planned construction. The annual emissions estimates for construction and the final estimated annual emissions are provided in Table 2. The sources of emissions are described below, and detailed emission calculation information is provided in Appendix C of the EA. Although the Proposed Action will result in different emissions in Kern County and San Bernardino County, the total estimated worst-case emissions are treated as one area for comparison with the *de minimis* limits. No indirect emissions would be associated with this action.

3.1 FY 2009

For purposes of this emissions evaluation, it is assumed that site preparation, demolition, and construction of the Fabrication Assembly Facility, Test Control Building, and Test Pad will occur in FY 2009. It is assumed that 9,849 square meters (105,975 square feet) of excavation and grading will occur, 1,673 square meters (18,008 square feet) of space (including the test pad) will be constructed, 441 square meters (4,745 square feet) will be demolished, and 2.39 total hectares (5.9 total acres) will be disturbed. Appendix C provides detailed breakdown and assumptions related to the assessment of air emissions from the construction of these facilities. Emission totals are summarized in Table 2.

3.2 FY 2010

It is assumed that in FY 2010 the Laboratory Office will be constructed, road widening and paving, parking lot paving, and concrete and sidewalk work will be done. It is assumed that 372 square meters (4,004 square feet) of space will be constructed, 27,398 square meters (294,802 square feet) will be paved or surfaced, 2,387 square meters (25,685 square feet) of sidewalks and concrete will be laid, and 3.01 total hectares (7.5 total acres) will be disturbed. Appendix C provides detailed breakdown and assumptions related to the assessment of air emissions from the construction of these facilities. Emission totals are summarized in Table 2.

3.3 Final Annual Emissions

The permanent changes that will result in increased air emissions include the operation of POVs, heating and cooling of new built space, ordnance detonation, and aircraft testing. Emissions from automobiles were calculated using data collected for the NAWS China Lake Traffic Impact Study (U.S. Navy 2006), and built space emissions estimates were based on new built space, average natural gas use for built space, and USEPA emission factors (See Appendix C). The potential emissions from ordnance detonation and aircraft testing have already been analyzed and approved in the facility-wide permits issued by the Mojave Desert AQMD and therefore are not included in this annual estimate. The final annual emissions are summarized in Table 2. Since the full implementation of the

relocation would not occur until after construction activities are complete, this increase in emissions will occur annually after 2010.

Table 2 Annual Emissions

Activity	PM₁₀ (TPY)
Grading Equipment	0.17
Material Hauling	0.32
Fugitive Emissions	3.05
2009 Total Emissions	3.54
Grading Equipment	0.22
Material Handling	0.40
Fugitive Emissions	3.48
2010 Total Emissions	4.10
POV operation increase	0.0016
Heating and Cooling of new buildings	0.0020
Final Annual Emissions	0.0036

Key:

TPY = Tons per year.

4.0 Conclusion

Total direct and indirect emissions of PM₁₀ for all years evaluated are below the *de minimis* threshold of 100 tons per year for PM₁₀ moderate non-attainment and maintenance areas. These emission levels are also less than 10% of the air district's total inventory of PM₁₀ emissions; thus, they are not regionally significant. Therefore, the proposed federal action is exempt from further analysis under the General Conformity Rule.

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 will conform to the SIP.

John P. Hare

Date

9 July 2007.