Air Quality General Conformity Review



General Conformity Review, USARAK Aviation EIS, Fairbanks, Alaska

PREPARED FOR: U.S. Army Alaska

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DATE: March 12, 2009

The construction of new facilities and increase in personnel proposed in the USARAK Aviation Environmental Impact Statement (EIS) will be located at Fort Wainwright (FWA) in the Fairbanks carbon monoxide (CO) maintenance area and the Fairbanks recently designated nonattainment area for particulate matter less than or equal to 2.5 microns in diameter (PM_{2.5}). Furthermore, the additional troops commuting to and from Fort Richardson (FRA) under Alternative 3 will be in the Municipality of Anchorage CO maintenance area. As a result, the general conformity rule applies to FWA and FRA for CO and to FWA for PM_{2.5}. This general conformity review demonstrates that the proposed action conforms to the State Implementation Plan (SIP) (Title 40 of the Code of Federal Regulations [CFR] Part 51, Subpart B, and Title 18 of the Alaska Administrative Code [AAC], Chapter 50, Section 725 [18 AAC 50.725]) for CO. The state attainment demonstration plan for PM_{2.5} is currently being developed. The general conformity rule applies to all federal actions not addressed by the transportation conformity rule.

The general conformity rule first involves a conformity analysis to determine if the proposed action is exempt. The quantity of the nonattainment or maintenance area pollutant released during the highest emission year is compared to the exempt thresholds for that pollutant. If the threshold is exceeded, further analysis is required through a conformity determination. The analyses must consider both construction year(s) and operating years, and include the total direct emissions as well as indirect emissions as a result of the proposed action. The exempt thresholds considered for this analysis are as follows:

- 100 tpy CO for the Fairbanks and the Municipality of Anchorage CO maintenance areas.
- 100 tpy PM_{2.5} and 100 tpy for the PM_{2.5} precursor pollutants nitrogen oxide (NO_x), sulfur dioxide (SO₂), and volatile organic compounds (VOCs) for the designated Fairbanks PM_{2.5} nonattainment area.

Methodology

Three alternative actions are presented in the USARAK Aviation EIS. The general conformity analysis uses the worst-case alternative to estimate emissions. Alternate 3, Combat Aviation Brigade (CAB), was selected as the worst-case scenario. This alternative action proposes the largest increase in facility construction and personnel additions.

Alternative 3 involves constructing 20 buildings and six parking and storage areas on 73.3 acres of FWA property and adding 2,360 Soldiers and 1,035 civilian employees distributed between the FWA, FRA, and Eielson AFB. Alternative 2 was not chosen because it would result in less emissions from decreased construction and fewer personnel when compared to Alternative 3. Alternative 1, the No Action alternative, would not cause an increase in new emission sources.

Emissions as a result of constructing the proposed facilities at FWA are expected to occur in the 2010 through 2015 construction seasons. Site preparation and actual construction are assumed to be typical for the Fairbanks area with no unique aspects relative to the release of CO, PM_{2.5}, NO_x, SO₂, and VOCs. Pollutants will be released by construction equipment and vehicles, as well as from vehicles transporting workers to and from the site.

Emissions of CO, PM_{2.5}, NO_x, SO₂, and VOCs as a result of operations at FWA will include emissions from potential emergency generator testing, helicopter training exercises, support activities for the helicopters, and vehicles transporting Soldiers and civilian employees to and from FWA.

Emissions of CO as a result of operations at FRA will include vehicle emissions of commuters from within the Municipality of Anchorage to FRA. FRA facilities are not in the designated CO maintenance area and, therefore, are not included in the conformity review calculations. In addition, there are no new facilities proposed at FRA in the Proposed Action.

Construction Emissions

Equipment emissions for building and site preparation were calculated using the U.S. Environmental Protection Agency's (EPA) NONROAD Emissions program with the following assumptions:

- Construction beginning in 2010 and lasting through 2015. A 10-month working season is assumed.
- The estimated equipment and hours of usage are based on the type and scope of the project.
- A 100 percent load was used as the worst-case assumption.

On-road hauling vehicle emission calculations estimated the number and length of trips from the estimated amount of materials to be moved onsite and offsite. Each load was assumed to be 20 cubic yards. It was assumed that the material hauling offsite and the material hauling onsite would be independent of each other as the worst-case scenario.

Emissions as a result of workers commuting were calculated using MOBILE6 emissions with current emission factors and the following assumptions:

- 300 construction workers
- Working 22 days per month for 10 months
- 10-mile round-trip commute

Asphalt emission calculations assumed 5 acres would be paved per year and used the California Air Resource Board URBEMIS program emissions factor.

Total estimated annual emissions for one construction season as a result of constructing the new buildings are presented in the table below. Emissions are conservatively estimated to be equal for each remaining construction season, as the pace of construction would decrease and future fuel and engine regulations would reduce emissions.

| Total Construction Emissions for a Construction Season (ton/year) | | | | | | | | | | |
|-------------------------------------------------------------------|----------------------------|---------------------------------------------|--------------------------------------------|-----------------------------------------|-----------------------------------------------------------------|--|--|--|--|--|
| | Carbon Monoxide (CO) | Oxides of Nitrogen (NO _x) | Volatile Organic Compounds (VOCs) | Sulfur Dioxide (SO ₂) | Particulate Matter (PM ₁₀ /PM _{2.5}) | | | | | |
| Equipment Emissions - Building and Site Preparation | 7.4 | 16.3 | 1.3 | 0.01 | 1.1 | | | | | |
| On-Road Hauling Vehicle Emissions | 0.7 | 0.3 | 0.3 | 0.3 | 0.3 | | | | | |
| Worker Commute Emissions | 12.2 | 1.0 | 0.5 | 0.01 | 0.02 | | | | | |
| Site Grading Fugitive Dust Emissions | | | | | 4.0 | | | | | |
| Asphalt Emissions | | | 0.01 | | | | | | | |
| TOTAL | 20.3 | 17.6 | 2.1 | 0.32 | 5.4 | | | | | |

Note: PM_{2.5} assumed to be equal to PM₁₀ as a conservative approach.

Operation Emissions

Operation of new facilities at FWA will result in the release of CO, PM_{2.5}, NO_x, SO₂, and VOCs from emergency generator testing, helicopter training exercises, support activities for the helicopters, and vehicles transporting Soldiers and civilian employees to and from FWA and FRA. It was assumed that the new buildings will be placed on the existing Central Heat and Power Plant (CHPP) grid. The increased demand is expected to be absorbed by the CHPP without affecting coal consumption or increasing any NAAQS-compliant emission limits currently regulated by Doyon Utilities, LLC (DU) Title V air operating permit¹. DU is responsible for the operation of the CHPP and for supplying heat and power to sustain the mission of FWA. DU is also responsible for the Title V operating permit and the federal requirements within the permit. Current emissions rates are expected to be reduced and the overall CHPP capacity increased with improvement projects planned, as outlined in Subsection 3.1.2.9.2 of the USARAK Aviation EIS. The increased load would not cause a significant increase to the current emissions from the CHPP. In addition to the regulatory requirements for the CHPP, any requirements for the new emergency generators would fall under the permit responsibility of DU.

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¹ Personal communication with FWA Air Quality officials, March 6, 2009. NAAQS-compliant emission rates are premised on a maximum coal consumption of 336,000 tons per consecutive 12-month period based on DU's #AQ1121TVP01 permit. Current 3-year average usage is approximately 220,000 tons per year.

Generator sizes were estimated from similar-size facilities currently located at FWA. It was assumed that three buildings (two new hangars and deluge well house) would require an emergency generator, and would potentially operate for 500 non-emergency hours per year as the worst-case scenario. Emissions from the generators were estimated using EPA's AP-42 emission factors.

Emissions as a result of employees commuting were estimated using MOBILE6 emission factors for 2013, the first expected year of operation. Miles traveled on Post and emissions from parking were included in the review. This resulted in a conservative estimate of FRA emissions because the installation is located outside the Anchorage CO maintenance boundary. The review uses the following assumptions:

FWA

- 2,121 Soldiers and civilian employees
- 240 working days per year
- 52 percent of the Soldiers and all civilians live off Post
- 10 percent of off-Post Soldiers and civilian employees live in North Pole

• FRA

- 634 Soldiers and civilian employees
- 240 working days per year
- 80 percent of the Soldiers and all civilian employees live off Post
- 33 percent of off-Post personnel live in Eagle River

Helicopter emissions and support activities were estimated using Emission Dispersion and Modeling System 4.5 (EDMS). This tool was developed by the Federal Aviation Administration (FAA) to estimate emissions related to mobile sources on airports. Modeling assumes typical ground support equipment for 50 percent of the operations and that one takeoff is an operation and one landing is an operation. The following assumptions were made for helicopter operations, which are based on Tables 2.5.a, 4.2.b, and 4.2.d of the EIS:

30 additional Kiowa OH-58D helicopters stationed at FWA

10 additional Blackhawk HH-60s helicopters stationed at FWA

20 additional Blackhawk UH-60s helicopters stationed at FRA

4,800 additional operations of Kiowa OH-58D helicopters at FWA

1,500 additional operations of Blackhawk HH-60s helicopters stationed at FWA

4,792 additional operations of Blackhawk UH-60s helicopters at FRA

Estimates of painting operations were assumed to be comparable to similar sources currently in operation.

Estimated emissions as a result of operations at FWA and FRA are presented below:

| Total Operating Emissions FWA (tons/year) | | | | | | | | | |
|-------------------------------------------|----------------------------|---------------------------------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------------------------------|--|--|--|--|
| | Carbon Monoxide (CO) | Oxides of Nitrogen (NO _x) | Volatile Organic Compounds (VOCs) | Sulfur Dioxide (SO ₂) | Particulate Matter (PM ₁₀ /PM _{2.5}) | | | | |
| Emergency Generators | 1.0 | 4.7 | 0.4 | 0.3 | 0.3 | | | | |
| Vehicles and Parking | 29.3 | 2.9 | 1.6 | 0.04 | 0.1 | | | | |
| Helicopter Operations | 3.1 | 1.7 | 1.4 | 0.5 | 0.2 | | | | |
| Paint Booths | | | 1.0 | | | | | | |
| TOTAL | 33.4 | 9.3 | 4.4 | 0.84 | 0.6 | | | | |

Notes:

 $PM_{2.5}$ emission rates are assumed to be equal to PM_{10} as a conservative approach and because emission factors are limited for $PM_{2.5}$.

PM emission rates are assumed to be equal to SO_2 emission rates for helicopter emissions because EDMS is not equipped with emission factors for PM on some military engines.

| Total Operating Emissions FRA (tons/year) | | | | | | | | |
|-------------------------------------------|----------------------------|---------------------------------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------------------------------|--|--|--|
| | Carbon Monoxide (CO) | Oxides of Nitrogen (NO _X) | Volatile Organic Compounds (VOCs) | Sulfur Dioxide (SO ₂) | Particulate Matter (PM ₁₀ /PM _{2.5}) | | | |
| Vehicles and Parking | 21.0 | 2.2 | 1.4 | 0.02 | 0.04 | | | |
| Helicopter Operations | 7.0 | 6.1 | 6.1 | 0.9 | 0.9 | | | |
| TOTAL | 28.0 | 8.3 | 7.5 | 0.9 | 0.9 | | | |

Notes:

 $PM_{2.5}$ emission rates are assumed to be equal to PM_{10} as a conservative approach and because emission factors are limited for $PM_{2.5}$.

PM emission rates are assumed to be equal to SO_2 emission rates for helicopter emissions because EDMS is not equipped with emission factors for PM on some military engines.

Conclusion

FWA CO Maintenance Area and PM_{2.5} Nonattainment Area

The worst-case year for emissions at FWA is expected to be the first year of operation, while construction is in progress. The estimated releases of CO, PM_{2.5}, NO_x, SO₂, and VOCs during this worst-case year, 2013, are given below. These emissions are below the general conformity thresholds of 100 tons per year; therefore, no further action is required.

| Total Worst-Case Emissions FWA (tons/year) | | | | | | | | | |
|--------------------------------------------|----------------------------|---------------------------------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------------------------------|--|--|--|--|
| | Carbon Monoxide (CO) | Oxides of Nitrogen (NO _X) | Volatile Organic Compounds (VOCs) | Sulfur Dioxide (SO ₂) | Particulate Matter (PM ₁₀ /PM _{2.5}) | | | | |
| Emissions from Construction, 2013 | 20.3 | 17.6 | 2.1 | 0.32 | 5.4 | | | | |
| Emission from Operations, 2013 | 33.4 | 9.3 | 4.4 | 0.84 | 0.6 | | | | |
| TOTAL | 53.7 | 26.9 | 6.5 | 1.16 | 6.0 | | | | |

Municipality of Anchorage CO Maintenance Area

Indirect emissions of CO into the Municipality of Anchorage maintenance area are estimated to be 28.0 tons per year from FRA. This is below the CO threshold of 100 tons per year; therefore, no further action is required by general conformity regulation.

USARAK Aviation EIS Potential-to-Emit (PTE) Calculations General Conformity Emission Summaries

Construction Emissions - Alternative 3 Worst-Case Scenario

| Total Construction Emissions (ton/year) | | | | | | | | | | |
|-----------------------------------------|-------------------------|--------------------------------------|------------------------------------------|--------------------------------------|-------------------------------|-----------------------------|--|--|--|--|
| | Carbon Monoxide (CO) | Volatile Organic Compounds (VOCs) | Oxides of Nitrogen (NO _X) | Sulfur Dioxide (SO ₂) | Particulate Matter (PM-10) | Particulate Matter (PM-2.5) | | | | |
| Equipment Emissions - Building and | | | | | | | | | | |
| Site Preparation | 7.4 | 1.3 | 16.3 | 0.01 | 1.1 | 1.1 | | | | |
| On-Road Hauling Vehicle Emissions | 0.7 | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | | | | |
| Site Grading Fugitive Dust | | | | | | | | | | |
| Emissions | | | | | 4.0 | 4.0 | | | | |
| Worker Commute Emissions | 12.2 | 0.5 | 1.0 | 0.01 | 0.02 | 0.02 | | | | |
| Asphalt Emissions | | 0.01 | | | | | | | | |
| TOTAL | 20.3 | 2.1 | 17.6 | 0.32 | 5.4 | 5.4 | | | | |

Operating Emissions (PTE) - Alternative 3 Worst-Case Scenario

| Total Operating Emissions FWA (tons/year) | | | | | | | | | |
|-------------------------------------------|-----------------|------------------|-----------------------------|--------------------|----------------|--------------------|--|--|--|
| | Carbon Monoxide | Volatile Organic | Oxides of | Sulfur Dioxide | Particulate | Particulate Matter | | | |
| | (CO) | Compounds (VOCs) | Nitrogen (NO _X) | (SO ₂) | Matter (PM-10) | (PM-2.5) | | | |
| Emergency Generators | 1.0 | 0.4 | 4.7 | 0.3 | 0.3 | 0.3 | | | |
| Helicopter Operations | 3.1 | 1.4 | 1.7 | 0.5 | 0.2 | 0.2 | | | |
| Paint Booths | | 1.0 | | | | | | | |
| Worker Commute Emissions | 29.3 | 1.6 | 2.9 | 0.04 | 0.12 | 0.06 | | | |
| Total | 33.4 | 4.4 | 9.3 | 0.84 | 0.50 | 0.5 | | | |

| Total Operating Emissions FRA (tons/year) | | | | | | | | | |
|-------------------------------------------|-----------------|------------------|-----------------------------|--------------------|----------------|--------------------|--|--|--|
| | Carbon Monoxide | Volatile Organic | Oxides of | Sulfur Dioxide | Particulate | Particulate Matter | | | |
| | (CO) | Compounds (VOCs) | Nitrogen (NO _X) | (SO ₂) | Matter (PM-10) | (PM-2.5) | | | |
| Helicopter Operations | 7.0 | 6.1 | 6.1 | 0.9 | 0.9 | 0.9 | | | |
| Worker Commute Emissions | 21.0 | 1.4 | 2.2 | 0.02 | 0.08 | 0.04 | | | |
| Total | 28.0 | 7.5 | 8.3 | 0.9 | 1.0 | 0.9 | | | |

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations Air Quality Emissions During Construction

| | | Start End | | Year/Month Year/Month | | | | |
|---------------------------------------------------------|--------------|-----------------|--------------------------|--------------------------|--------------|------------|----------------------------|----|
| Duration Work Schedule | | years Hr/Day | 22 | Days/Month | 10 | Month/year | | |
| Excavation Pavement Size Pavement Type (Asphalt/Cement) | | acres | Acres worked/ | | ı | | | |
| Calendar Year | Avg. Speed * | | Graded Number of Workers | | Total Worker | 66,000 | Miles Traveled per Trip | 10 |
| YEAR**** Emissions Factors | 45 | | | 300 | ,00 | 30,000 | 6 | 10 |

Equipment Emissions - Building and Site Preparation quipment Classifications for NONROAD emission factors

| SCC | Equipment Type | Definition | Load Factor(%) | | ays per year | Hours per Day | equipment | Total Hours | CO | VOC | NOx | SOx ** | PM10 | CO | VOC | NOx | | PM10 |
|------------|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------|--------------|---------------|-----------|-------------|--------|--------|---------|--------|--------|------|------|------|------|------|
| 2270002015 | Rollers | Rollers include smooth and knobby (such as used in landfills and called "compactors" not to be confused with smaller Plate Compacters) self-propelled rollers | 100% | Diesel | 22 | 8 | 3 | 528 | 142.60 | 24.65 | 273.62 | 0.28 | 22.93 | 0.08 | 0.01 | 0.16 | 0.00 | 0.01 |
| 2270002021 | Paving Equipment | Various equipment types used to smooth and distributing paving material including vibrators and finishers to support the work of the pavers | 100% | Diesel | 22 | 8 | 3 | 528 | 117.89 | 21.00 | 220.06 | 0.21 | 18.76 | 0.07 | 0.01 | 0.13 | 0.00 | 0.01 |
| 2270002039 | Concrete/Industrial Saws | Handheld and large engine powered saws for stone cutting. | 100% | Diesel | 30 | 2 | 7 | 420 | 111.00 | 17.49 | 147.31 | 0.15 | 17.41 | 0.05 | 0.01 | 0.07 | 0.00 | 0.01 |
| 2270002051 | Off-highway Trucks | Large off-highway dump trucks not certified for highway use | 100% | Diesel | 66 | 8 | 4 | 2,112 | 765.22 | 130.92 | 2350.96 | 2.27 | 105.95 | 1.78 | 0.30 | 5.47 | 0.01 | 0.25 |
| 2270002057 | Rough Terrain Forklifts | Rough terrain forklifts (RTF) can be confused with typical forklifts but have larger knobby off-road wheels and can be confused with rubber-tire loaders, but are specifically designed for handling palettes. RTFs include telescoping lift trucks called teles. | 100% | Diesel | 66 | 4 | 10 | 2,640 | 188.89 | 31.09 | 302.72 | 0.30 | 29.59 | 0.55 | 0.09 | 0.88 | 0.00 | 0.09 |
| 2270002060 | Rubber Tire Loaders | Bucket loaders or front-end loaders with a front mounted bucket for scooping though other attachments can be used instead of a bucket | 100% | Diesel | 22 | 8 | 20 | 3,520 | 315.77 | 55.01 | 761.30 | 0.71 | 48.21 | 1.23 | 0.21 | 2.95 | 0.00 | 0.19 |
| 2270002066 | Tractors/Loaders/Backhoes | Common and ubiquitous multipurpose equipment type that is most often referred to as a "backhoe" but include the combined functions of loading and a backhoe in one unit. Agricultural tractors with alternative attachments may used for similar purposes | 100% | Diesel | 66 | 8 | 10 | 5,280 | 130.27 | 29.87 | 138.89 | 0.12 | 20.19 | 0.76 | 0.17 | 0.81 | 0.00 | 0.12 |
| 2270002081 | Other Construction Equipment | Miscellaneous category for equipment not categorized above | 100% | Diesel | 132 | 5 | 7 | 4,620 | 568.74 | 85.57 | 1146.80 | 0.96 | 77.82 | 2.90 | 0.44 | 5.84 | 0.00 | 0.40 |
| | | | | | | | | | | | | | | | | | | |

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations Air Quality Emissions During Construction

SOX Calculated from SO2 Emissions Factors

On-Road Hauling Vehicle Emissions

| | Project 2 way trips | Miles Traveled per trip | Assumptions |
|--------------------------|---------------------|----------------------------|-------------|
| Materials to site | 1000 | 10 | |
| Permafrost removal | 25,000 | 10 | |
| New Fill brought to site | 25,000 | 10 | |
| | | | |

| Vehicle Emission Factors (GR/Mile) | | | | | | |
|------------------------------------|--------------|-------|-------|-------|--------|--------|
| Calendar Year | Avg. Speed * | СО | NOx | VOC | PM10 | Sox |
| YEAR**** Emissions Factors | 45 | 1.182 | 5.836 | 0.271 | 0.2174 | 0.0105 |
| | | | | | | |

Vehicle emission factor source: Modeled Emission factors from MOBILE6.2 from

Assumed HDDV8b Class 8b Heavy-Duty Diesel Vehicles (>60,000 lbs. GVWR)

Site Grading Fugitive Dust Emissions

| | PM Tons/Acer-month | Acres worked | Months | Emissions Red | Emissions (PM) |
|--------------------|--------------------|--------------|--------|----------------------|----------------|
| Average Conditions | 0.11 | 18.0 | 4 | 0.5 | 3.96 |
| | | | | 0 | |

Assumed this number included Demolition Emissions

Algorithm: Acres of Area Graded *Months of Grading*Control reduction* EF = Emissions from Grading

Worker Commute Emissions

| | Number of Workers Trips | | Miles Traveled | |
|----------------|-------------------------|--------|----------------|--|
| | | | | |
| Worker Commute | 300 | 66,000 | 10 | |

by project: # workers x days/wk x wk/month x month/yr

| Vehicle Emission Factors (GR/Mile) | | | | | | |
|------------------------------------|--------------|--------|-------|-------|------|--------|
| Calendar Year | Avg. Speed * | СО | NOx | VOC | PM10 | Sox |
| YEAR**** Emission Factors | 45 | 16.836 | 1.415 | 0.723 | 0.03 | 0.0093 |

* Used 2007 Emissions Factors as the worst case

From Mobile 6, Run November 2006

| Worker Commute Emissions | | | | | |
|--------------------------|-----------|----------|----------|-------|-------|
| | CO | NOx | VOC | PM10 | Sox |
| LBS | 24,497.24 | 2,058.90 | 1,052.00 | 41.91 | 13.53 |
| TONS | 12.25 | 1.03 | 0.53 | 0.02 | 0.01 |

Asphalt Emissions

| Acres to be paved | 5.0 | |
|-------------------------------|---------|--------------|
| Emissions Factor * | 2.62 | lbs VOC/acre |
| Emissions from asphalt paving | 13.1 | lbs VOC |
| | 0.00655 | Tons VOC |

^{*} Emissions Factor from the CARB URBEMIS program guidance page a-12

^{*}We did not use the equation in AP-42, Section 4.5 because we did not know the thickness of the asphalt

USARAK Aviation EIS - Alternative 3 Potential-to-Emit Calculations New Emergency Back-up Generators at FWA

Assumptions

Assume each back up generator is 150 kW or 201 hp (based off of like source at FWA)

Number of Buildings 3
Hours of Operation 500 hr/yr USEPA default for potential-to-emit hours of operation for back-up generators

hp-hr per year 301,500 hp-hr/yr

Criteria Pollutant Calculations

| Pollutant | Emission Factors | Potential Emissions |
|-----------------|---------------------|------------------------|
| NO _x | 3.10E-02 | 4.67 |
| co | 6.68E-03 | 1.01 |
| SO ₂ | 2.05E-03 | 0.31 |
| PM10 | 2.20E-03 | 0.33 |
| VOC | 2.51E-03 | 0.38 |

Hazardous Air Pollutant Calculations

| | | Emission Factors | Potential |
|---------------|-----------|---------------------|--------------------|
| Pollutant | Cas. NO. | (lb/hp-hr) | Emissions (ton/yr) |
| Benzene | 71-43-2 | 6.53E-06 | 9.85E-04 |
| Toluene | 108-88-3 | 2.86E-06 | 4.32E-04 |
| Xylenes | 1330-20-7 | 2.00E-06 | 3.01E-04 |
| Propylene | 75-56-9 | 1.81E-05 | 2.72E-03 |
| 1,3-Butadiene | 106-99-0 | 2.74E-07 | 4.13E-05 |
| Formaldehyde | 50-00-0 | 8.26E-06 | 1.25E-03 |
| Acetaldehyde | 75-07-0 | 5.37E-06 | 8.09E-04 |
| Acrolein | 107-02-8 | 6.48E-07 | 9.76E-05 |
| Napthalene | 91-20-3 | 5.94E-07 | 8.95E-05 |

Total HAP 6.72E-03

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations Helicopter Training Missions

Assumptions:

General

50% operational ground support for helicopters stationed at base Like engines used for specific engines not found in EDMS software One operations is a takeoff or a landing. Increases from the no action alternative were derived from Airfield and Airspace Activity

Fort Wainwright - Fairbanks

30 additional Kiowa OH-58D helicopters stationed at FWA 10 additional Blackhawk HH-60 helicopters stationed at FWA 4,800 addition operations of the Kiowa OH-58D helicopters 1,500 addition operations of the Blackhawk UH-60 helicopters

Fort Richardson - Anchorage

20 additional Blackhawk UH-60 helicopters at FRA 4,792 additional operations of the Blackhawk UH-60

Eielson Air Force Base

24 additional Apache AH-64 helicopters at EAFB 960 operations of the Apache AH-64

Donnelly Training Area - Allen AAF

34 additional operations of the Apache AH-64 586 additional operations of the Chinook CH-47 718 additional operations of the Blackhawk UH-60

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations Helicopter Training Missions

Criteria Pollutant Summary

| | FWA Potential Emissions (ton/yr) | | | | | | |
|-------------|----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Helicopters | 3.04 | 1.40 | 1.33 | 0.11 | 0.11 | 0.11 | |
| GSE | 0.07 | 0.01 | 0.39 | 0.38 | 0.11 | 0.11 | |
| Total | 3.11 | 1.40 | 1.72 | 0.49 | 0.22 | 0.22 | |

| | FRA Potential Emissions (ton/yr) | | | | | | |
|-------------|----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Helicopters | 6.12 | 5.80 | 2.70 | 0.21 | 0.21 | 0.21 | |
| GSE | 0.89 | 0.27 | 3.43 | 0.66 | 0.66 | 0.66 | |
| Total | 7.01 | 6.07 | 6.13 | 0.87 | 0.87 | 0.87 | |

| | EAFB Potential Emissions (ton/yr) | | | | | | |
|-------------|-----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Helicopters | 1.11 | 1.03 | 0.54 | 0.04 | 0.04 | 0.04 | |
| GSE | 0.16 | 0.05 | 0.61 | 0.12 | 0.05 | 0.047 | |
| Total | 1.27 | 1.08 | 1.14 | 0.16 | 0.09 | 0.09 | |

| | DTA Potential Emissions (ton/yr) | | | | | | |
|-------------|----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Helicopters | 0.89 | 0.14 | 0.87 | 0.06 | 0.06 | 0.06 | |
| GSE | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Total | 0.89 | 0.14 | 0.87 | 0.06 | 0.06 | 0.06 | |

Notes:

All calculations using EDMS 4.5 with helicopter operation assumptions from Table 2.5.a, Table 4.2.c, and Table 4.2.d proposed in the February 2009 Draft Aviation EIS.

Final EIS emissions were adjusted based on the percent increase of operations for FWA (107%) and FRA (26%).

DTA used increase activity not shown in Table 4.2.c and 4.2.d to consevatively estimate training emissions.

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations Vehicle Trips to FWA and FRA

Assumptions

| Fort Wainwright - Fairbanks | | | |
|--------------------------------------------------------|-----------------|--------------------|---------------|
| Assume 80% of personnel assigned to FWA | 2121 new employ | ees (including civ | vil servants) |
| Assume 52% of soldiers and all civilians live off base | 1103 | , - | • |
| Assume 10% would live in North Pole | 110 | | |
| Average round trip to North Pole off-base | 28 miles | @ 65 MPH | |
| Average round trip Fairbanks off-base | 6 miles | @ 45 MPH | |
| Average round trip distance to place of work on-base | 2 miles | @ 25 MPH | |
| Working Days | 240 | | |
| Yearly average temperature | 26.95 degrees F | | |
| Parking activities | 509,040 | @ 10 MPH | 2 Min idle |
| | | | |
| Fort Richardson - Anchorage | | | |
| Assume 10% of personnel to FRA | 637 | | |
| Assume 80% live off base | 510 | | |
| Assume 1/3 lives in Eagle River | 170 | | |
| Average round trip to MOA off-base | 10 miles | @ 35 mph | |
| Average round trip to Eagle River off-base | 28 miles | @ 65 mph | |
| Average round trip distance to place of work on-base | 2 miles | @ 25 mph | |
| Working days | 240 | | |
| Yearly average temperature | 36.15 degrees F | | |
| Parking activities | 152,880 | @ 10 MPH | 2 Min idle |
| Eielson Air Force Base | | | |
| Assume 10% of personnel to FRA | 637 | | |
| Assume 80% live off base | 510 | | |
| Assume 50% live in Fairbanks | | | |
| Assume 50% live in Northpole | 255 | | |
| Average round trip to Fairbanks | 60 miles | @65 mph | |
| Average round trip to Northpole | 20 miles | @65 mph | |

USARAK Aviation EIS - Alternative 3 Potential-to-Emit (PTE) Calculations **Vehicle Trips to FWA and FRA**

Average round trip distance to place of work on-base

Working Days 240

2 miles

@ 25 mph

Yearly average temperature

26.95 degrees F

Parking activities 152,880 @ 10 MPH 2 Min idle

Emission Calculations (EPA Mobile 6)

| | Potential Emissions FWA (ton/yr) | | | | | | |
|----------|----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Vehicle | 27.72 | 1.47 | 2.73 | 0.03 | 0.11 | 0.06 | |
| Parking | 1.58 | 0.14 | 0.12 | 0.001 | 0.005 | 0.002 | |
| Total | 29.30 | 1.61 | 2.85 | 0.04 | 0.12 | 0.06 | |

| | Potential Emissions FRA (ton/yr) | | | | | | |
|----------|----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Vehicle | 20.40 | 1.27 | 2.12 | 0.02 | 0.08 | 0.04 | |
| Parking | 0.62 | 0.08 | 0.05 | 0.00 | 0.00 | 0.00 | |
| Total | 21.02 | 1.35 | 2.17 | 0.02 | 0.08 | 0.04 | |

| | Potential Emissions EAFB (ton/yr) | | | | | | |
|----------|-----------------------------------|------|-----------------|-----------------|------------------|-------------------|--|
| Activity | CO | VOC | NO _x | SO ₂ | PM ₁₀ | PM _{2.5} | |
| Vehicle | 60.46 | 3.31 | 6.43 | 0.05 | 0.21 | 0.12 | |
| Parking | 0.64 | 0.08 | 0.05 | 0.00 | 0.00 | 0.00 | |
| Total | 61.10 | 3.39 | 6.48 | 0.05 | 0.21 | 0.12 | |