APPENDIX C

Record Of Non-Applicability (RONA) for the General Conformity Rule

RECORD OF NON-APPLICABILITY CONCERNING THE GENERAL CONFORMITY RULE (40 CFR § 51)

Congress enacted Section 2801 of the 1996 Defense Authorization Act (Public Law 104-106; codified at 10 U.S.C. 2871-85). This law, known as the Military Housing Privatization Initiative, gives the Army alternative authorities for improvement and construction of military family housing allowing the Army to obtain private sector funding to satisfy family housing requirements.

Fort Detrick, Maryland, proposes to remedy the family housing deficiencies by privatizing family housing functions through implementation of the Army Residential Communities Initiative (RCI). Under this proposal, this installation would enter into a contract to have a private developer adjust the on-post inventory of family housing to reflect current and future needs.

Conformity under the Clean Air Act, Section 176, has been evaluated for the proposed action in accordance with 40 CFR Part 51. Fort Detrick resides within Frederick County in the Central Maryland Air Quality Control Region (Area II). This area is classified by the USEPA as a severe nonattainment area for ozone. Estimated direct and indirect emissions for the year with the greatest intensity of work are described in Table 1 and compared to the de minimis levels for severe ozone areas. All emissions would fall well below the de minimis threshold established in 40 CFR § 51.853(b) shown in Table 1. These emissions represent an increase of 0.015 percent for NO_x, and 0.03 percent for VOC in Area II. Therefore, the project/action is not considered regionally significant since the pollutant emissions are less than 10 percent of annual county emissions. A formal General Conformity Determination is not required for the proposed action.

Table 1

Comparison of the De Minimis Levels for Criteria Pollutants for Severe NAAs and Estimated Emissions of the Proposed Action

Criteria Pollutant	*De Minimis* Level Tons/Year	Estimated Emissions Tons/Year
VOC	25	4.3
NO_x	25	10.9
CO	100	11.2
PM_{10}	50	1.0
SO_2	100	0.6

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Signature

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Date

Fort Detrick Calculator for Construction Emissions

10/12/2003

Assumptions:

(1) Equipment will operate 8 hours per day of activity

(2) LDGVs are construction workers traveling 40 miles per day to and from construction site

(3) Emission Factors are from AP-42

(4) Construction of 292 facilities, renovation of 62 facilities, and demo of 127 facilities will take 2-3 years

(5) Emissions table below estimates the maximum annual emissions for the busiest year during 2-3 years

Construction Vehicles	Units	# of Vehicles	# of Miles/Day	# of Hrs/Day	# of Days	Total # of Hrs or Miles	EF NOx	EF VOC	EF PM10	CO EF	SOx EF	NOx (Tons/yr)	VOC (Tons/yr)	PM10 (Tons/yr)	CO (Tons/yr)	SOx (Tons/yr)
Light Duty Gasoline Vehicle	lb/mile	15	40	N/A	250	150000	0.007	0.021	0.0003	0.030	0.0004	0.525	1.575	0.023	2.250	0.030
Light Duty Gasoline Truck	lb/mile	5	10	N/A	250	12500	0.003	0.007	0.0002	0.068	0.0001	0.019	0.044	0.001	0.425	0.001
Heavy Duty Gasoline Truck	lb/mile	2	80	N/A	150	24000	0.010	0.006	0.0003	0.066	0.0004	0.120	0.072	0.004	0.792	0.005
Light Duty Diesel Truck	lb/mile	3	70	N/A	100	21000	0.004	0.002	0.0010	0.008	0.0010	0.042	0.021	0.011	0.084	0.011
Heavy Duty Diesel Truck	lb/mile	3	30	N/A	150	13500	0.045	0.014	0.0060	0.053	0.0070	0.304	0.095	0.041	0.358	0.047
Track Tractor	lb/hour	0	0		0	0	1.260	0.121	0.1120	0.346	0.1370	0.000	0.000	0.000	0.000	0.000
Wheeled Tractor	lb/hour	1		8	60	480	0.892	0.185	0.0580	3.590	0.0900	0.214	0.044	0.014	0.862	0.022
Wheeled Loader	lb/hour	2	N/A	8	60	960	1.890	0.250	0.1720	1.790	0.1820	0.907	0.120	0.083	0.859	0.087
Concrete Truck	lb/hour	5	N/A	8	60	2400	2.166	0.192	0.2560	0.046	0.0040	2.599	0.230	0.307	0.055	0.005
Shipping Truck	lb/hour	1	N/A	8	110	880	1.691	0.152	0.1390	0.046	0.0040	0.744	0.067	0.061	0.020	0.002
Dump/haul Truck	lb/hour	4	N/A	8	60	300	1.690	0.192	0.2560	1.790	0.4540	0.254	0.029	0.038	0.269	0.068
Water Truck	lb/hour	2	N/A	8	100	1600	0.169	0.192	0.1390	0.046	0.1400	0.135	0.154	0.111	0.037	0.112
Gas Forklift	lb/hour	2	N/A	8	40	640	0.412	0.560	0.0210	12.600	0.0170	0.132	0.179	0.007	4.032	0.005
Diesel Forklift	lb/hour	0	N/A	8	0	0	1.691	0.152	0.1390	0.434	0.0440	0.000	0.000	0.000	0.000	0.000
Soil Roller/Compactor	lb/hour	2	N/A	8	30	480	0.863	0.064	0.1390	0.046	0.0070	0.207	0.015	0.033	0.011	0.002
Motor Grader	lb/hour	2	N/A	8	60	960	0.703	0.040	0.0610	0.151	0.0860	0.337	0.019	0.029	0.072	0.041
Excavator	lb/hour	2	N/A	8	100	1600	1.691	0.152	0.1390	0.675	0.1430	1.353	0.122	0.111	0.540	0.114
Bulldozer	lb/hour	2	N/A	8	60	960	4.160	2.900	0.1650	0.346	0.0348	1.997	1.392	0.079	0.166	0.017
Frontend Loader	lb/hour	2	N/A	8	30	480	1.890	0.250	0.1720	0.570	0.1830	0.454	0.060	0.041	0.137	0.044
Backhoe Loader	lb/hour	2	N/A	8	30	480	1.890	0.250	0.1120	0.570	0.1830	0.454	0.060	0.027	0.137	0.044
Crane	lb/hour	1	N/A	8	20	160	1.691	0.152	0.1390	0.674	0.0070	0.135	0.012	0.011	0.054	0.001
Off Road Trucks	lb/hour	0	N/A	8	30	0	4.166	0.192	0.2560	1.790	0.4540	0.000	0.000	0.000	0.000	0.000
Other Misc Equip	lb/hour	0		0	0	0	1.690	0.149	0.1380	0.675	0.0020	0.000	0.000	0.000	0.000	0.000
Scrapper	lb/hour	0		0	0	0	3.830	0.275	0.4050	1.251	0.4620	0.000	0.000	0.000	0.000	0.000
Totals												**10.9**	**4.3**	**1.0**	**11.2**	**0.7**