

Appendix C

Record of Non-Applicability (RONA)

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

**LAGUNA ROAD CULVERT INSTALLATION
NAVAL BASE VENTURA COUNTY (NBVC)
POINT MUGU, CALIFORNIA
SEPTEMBER 2015**

PREPARED FOR

U.S. Department of the Navy
Navy Region Southwest
San Diego, California

PROPOSED ACTION

The Proposed Action falls under the Record of Non-Applicability (RONA) category and is documented with this RONA.

Action Proponent: Commanding Officer, NBVC Point Mugu, California

Location: Ventura County, California

Proposed Action Name: Laguna Road Culvert Installation, NBVC Point Mugu, California

PROPOSED ACTION AND EMISSIONS SUMMARY

PROPOSED ACTION

Laguna Road Culvert Installation

EMISSIONS SUMMARY

Air quality impacts associated with the Proposed Action are related to emissions that would occur during the use of off-road diesel equipment involving a backhoe, front end loader, grader, hydraulic crane, asphalt paver, tandem roller, and dump truck. The principal sources of pollutants during construction of the Laguna Road culvert would include demolition/asphalt cutting and removal, soil excavation, channel contouring, grading, culvert placement, asphalt repaving, and disposal of waste debris.

Table 1 compares the maximum estimated emissions for the project at NBVC Point Mugu with the *de minimis* annual emissions thresholds set forth for the South Central Coast Air Basin (per EPA General Conformity Rule and OPNAVINST 5090.1D, Appendix F, Clean Air Act General

Conformity Guidance). Based on the air quality analysis, the maximum estimated emissions for the Proposed Action at NBVC Point Mugu would be below general conformity *de minimis* levels for all criteria pollutants for the South Central Coast Air Basin. Therefore, implementation of the Proposed Action at NBVC Point Mugu would result in minor, localized, short-term effects on air quality during construction, and impacts during construction would not be significant.

Table 1 Estimated Emissions at NBVC Point Mugu Compared to *de minimis* Emissions for Criteria Pollutants in the South Coast Air Basin₁

	VOC	NOx	CO	SOx	PM10
Project Emissions (Tons)	0.06	0.60	0.32	0.01	0.04
General Conformity <i>de minimis</i> Emissions (Tons)	50	50	100	100	100

Affected Air Basin: South Central Coast Air Basin, California

Date RONA Prepared: September 2015

RONA Prepared by: Hasan Jafar, NBVC Environmental Division, Point Mugu

Proposed Action Exemptions: The Proposed Action is exempt because the calculated total emissions are below the *de minimis* levels set forth in the Clean Air Act General Conformity Rule.

ATTAINMENT AREA STATUS AND EMISSIONS EVALUATION CONCLUSION

The project area at NBVC Point Mugu is located within the South Central Coast Air Basin, federally designated as nonattainment (serious) for ozone, unclassified for PM₁₀, unclassified/attainment for PM_{2.5}, NO₂, CO, and lead, and attainment for SO₂ for the Ventura County portion of the air basin.

Based on the data in Table 1, it is concluded that the Clean Air Act General Conformity Rule *de minimis* thresholds for applicable criteria pollutants would not be exceeded as a result of implementation of the Proposed Action at NBVC Point Mugu. Therefore, further formal Conformity Determination procedures are not required, resulting in this RONA.

RONA APPROVAL:

Date: 9-28-15

Signature: Daniel T. Shub

DARPEA Laguna Road Culvert Installation RONA Air Emissions Calculations
September 2015

EQUIPMENT	USAGE	EMISSION FACTORS ¹										PROJECT EMISSIONS				
		HRS	BHP	VOC g/hp-hr	NOx g/hp-hr	CO g/hp-hr	SOx g/hp-hr	PM ₁₀ g/hp-hr	VOC tons	NOx tons	CO tons	SOx tons	PM ₁₀ tons			
Grader 30,000 lbs	64	185	0.714	7.961	4.131	0.164	0.494	0.0093	0.1039	0.0539	0.0021	0.0065				
Front End Loader	112	48	0.714	7.961	4.131	0.164	0.494	0.0042	0.0472	0.0245	0.0010	0.0029				
Backhoe Loader	86	48	1.557	9.218	6.939	0.163	0.792	0.0071	0.0419	0.0316	0.0007	0.0036				
Dump Truck	8	220	0.714	7.961	4.131	0.164	0.494	0.0014	0.0154	0.0080	0.0003	0.0010				
Dump Truck	96	400	0.714	7.961	4.131	0.164	0.494	0.0302	0.3370	0.1749	0.0069	0.0209				
Asphalt Paver	8	130	0.714	7.961	4.131	0.164	0.494	0.0008	0.0091	0.0047	0.0002	0.0006				
Tandem Roller 10 ton	8	400	0.714	7.961	4.131	0.164	0.494	0.0025	0.0281	0.0146	0.0006	0.0017				
Hydraulic Crane 80 ton	8	300	0.68	8.38	2.70	0.162	0.402	0.0018	0.0222	0.0071	0.0004	0.0011				
TOTAL EMISSIONS IN TONS								0.06	0.60	0.32	0.01	0.04				

NOTES

1. Emission factors from USEPA Report NR-009c, 2004

DARP EA Laguna Road Culvert Installation RONA Air Emissions Calculations
September 2015

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