

APPENDIX D

RECORD OF CONFORMITY ANALYSIS

# AIR CONFORMITY APPLICABILITY MODEL REPORT

## RECORD OF AIR ANALYSIS (ROAA)

**1. General Information:** The Air Force's Air Conformity Applicability Model (ACAM) was used to perform an analysis to assess the potential air quality impact/s associated with the action in accordance with the Air Force Instruction 32-7040, Air Quality Compliance And Resource Management; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the General Conformity Rule (GCR, 40 CFR 93 Subpart B). This report provides a summary of the ACAM analysis.

**a. Action Location:**

**Base:** QUONSET STATE AIRPORT  
**State:** Rhode Island  
**County(s):** Washington  
**Regulatory Area(s):** NOT IN A REGULATORY AREA

**b. Action Title:** Installation Development Plan Environmental Assessment

**c. Project Number/s (if applicable):** See Section 5 or Project List table (below) for separate project numbers

**d. Projected Action Start Date:** 11 / 2021

**e. Action Description:**

The proposed projects include a list of new construction, renovation/repair, and demolition projects. Together, the projects in the Proposed Action further the plan to meet current security and safety standards and to improve sustainability of the base operations and the ability to efficiently meet mission requirements.

**f. Point of Contact:**

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**2. Air Impact Analysis:** Based on the attainment status at the action location, the requirements of the General Conformity Rule are:

\_\_\_\_\_ applicable  
  X   not applicable

Total combined direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" and "steady state" (net gain/loss upon action fully implemented) emissions.

"Air Quality Indicators" were used to provide an indication of the significance of potential impacts to air quality. These air quality indicators are EPA General Conformity Rule (GCR) thresholds (de minimis levels) that are applied out of context to their intended use. Therefore, these indicators do not trigger a regulatory requirement; however, they provide a warning that the action is potentially significant. It is important to note that these indicators only provide a clue to the potential impacts to air quality.

Given the GCR de minimis threshold values are the maximum net change an action can acceptably emit in non-attainment and maintenance areas, these threshold values would also conservatively indicate an actions emissions within an attainment would also be acceptable. An air quality indicator value of 100 tons/yr is used based on the GCR de minimis threshold for the least severe non-attainment classification for all criteria pollutants (see 40 CFR 93.153). Therefore, the worst-case year emissions were compared against the GCR Indicator and are summarized below.

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**Analysis Summary:**

## 2021

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.019	100	No
NOx	0.116	100	No
CO	0.129	100	No
SOx	0.000	100	No
PM 10	0.009	100	No
PM 2.5	0.005	100	No
Pb	0.000	25	No
NH3	0.000	100	No
CO2e	29.6		

## 2022

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.183	100	No
NOx	0.993	100	No
CO	1.112	100	No
SOx	0.003	100	No
PM 10	0.080	100	No
PM 2.5	0.041	100	No
Pb	0.000	25	No
NH3	0.001	100	No
CO2e	254.8		

## 2023

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.089	100	No
NOx	0.508	100	No
CO	0.724	100	No
SOx	0.002	100	No
PM 10	4.099	100	No
PM 2.5	0.020	100	No
Pb	0.000	25	No
NH3	0.001	100	No
CO2e	167.0		

## 2024

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.722	100	No
NOx	1.860	100	No
CO	2.219	100	No
SOx	0.006	100	No
PM 10	5.320	100	No

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<b>PM 2.5</b>	0.069	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.003	100	No
<b>CO2e</b>	523.5		

### 2025

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.328	100	No
<b>NOx</b>	0.432	100	No
<b>CO</b>	0.688	100	No
<b>SOx</b>	0.004	100	No
<b>PM 10</b>	0.537	100	No
<b>PM 2.5</b>	0.012	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.001	100	No
<b>CO2e</b>	37.8		

### 2026

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.163	100	No
<b>NOx</b>	0.222	100	No
<b>CO</b>	0.332	100	No
<b>SOx</b>	0.005	100	No
<b>PM 10</b>	0.012	100	No
<b>PM 2.5</b>	0.012	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.000	100	No
<b>CO2e</b>	56.4		

### 2027

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.034	100	No
<b>NOx</b>	0.184	100	No
<b>CO</b>	0.192	100	No
<b>SOx</b>	0.005	100	No
<b>PM 10</b>	0.864	100	No
<b>PM 2.5</b>	0.010	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.000	100	No
<b>CO2e</b>	38.4		

### 2028

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.692	100	No
<b>NOx</b>	1.094	100	No

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<b>CO</b>	1.617	100	No
<b>SOx</b>	0.009	100	No
<b>PM 10</b>	0.320	100	No
<b>PM 2.5</b>	0.046	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.002	100	No
<b>CO2e</b>	394.5		

### 2029

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.360	100	No
<b>NOx</b>	1.956	100	No
<b>CO</b>	3.321	100	No
<b>SOx</b>	0.018	100	No
<b>PM 10</b>	4.061	100	No
<b>PM 2.5</b>	0.081	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.002	100	No
<b>CO2e</b>	896.6		

### 2030

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.127	100	No
<b>NOx</b>	0.671	100	No
<b>CO</b>	0.901	100	No
<b>SOx</b>	0.012	100	No
<b>PM 10</b>	0.117	100	No
<b>PM 2.5</b>	0.042	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.000	100	No
<b>CO2e</b>	341.7		

### 2031 - (Steady State)

Pollutant	Action Emissions (ton/yr)	AIR QUALITY INDICATOR	
		Threshold (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
<b>VOC</b>	0.021	100	No
<b>NOx</b>	0.207	100	No
<b>CO</b>	0.170	100	No
<b>SOx</b>	0.010	100	No
<b>PM 10</b>	0.022	100	No
<b>PM 2.5</b>	0.022	100	No
<b>Pb</b>	0.000	25	No
<b>NH3</b>	0.000	100	No
<b>CO2e</b>	198.3		

None of estimated emissions associated with this action are above the GCR indicators, indicating no significant impact to air quality; therefore, no further air assessment is needed.

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Kelly Granberg, Environmental Engineer

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DATE