

**RECORD OF NON-APPLICABILITY (RONA)
FOR CLEAN AIR ACT CONFORMITY
DISPOSAL AND REDEVELOPMENT OF NMCRC TACOMA**

This proposed action falls under the Record of Non-Applicability (RONA) category and is documented with this RONA.

The U.S. Environmental Protection Agency (USEPA) published *Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule*, in the 30 November 1993, Federal Register (40 CFR Parts 6, 51, and 93). The U.S. Navy published *Clean Air Act Conformity Guidance* in Appendix F, OPNAVINST 5090.1C, dated 30 October 2007. These publications provide implementing guidance to document Clean Air Act Conformity Determination requirements.

Federal regulations state that no department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license to permit, or approve any activity that does not conform to an applicable implementation plan. It is the responsibility of the Federal agency to determine whether a Federal action conforms to the applicable implementation plan, before the action is taken (40 CFR Part 1 51.850[a]).

Federal actions may be exempt from conformity determinations if they do not exceed designated *de minimis* levels for criteria pollutants (40 CFR Part 51.853[b]). The Proposed Action is located in the State of Washington in the Puget Sound area. The Puget Sound area is classified as a nonattainment area for PM_{2.5} and a maintenance area for CO and PM₁₀. *De minimis* levels (in tons/year) for the air basin potentially affected by the Proposed Action are listed in Table 1.

**Table 1
De minimis Levels for Criteria Pollutants for the NMCRC**

Criteria Pollutant	<i>De minimis</i> Level (tons/year)
Carbon Monoxide (CO)	100
Particulate Matter (PM ₁₀)	100
Fine Particulate Matter (PM _{2.5})	100

Federal actions may also be exempt from conformity determinations if they would result in no emissions increase or an increase in emissions that is clearly *de minimis*, including “actions (or portions thereof) associated with transfers of land, facilities, title, and real properties through an enforceable contract or lease agreement where the delivery of the deed is required to occur promptly after a specific, reasonable condition is met, such as promptly after the land is certified as meeting the requirements of CERCLA, and where the Federal agency does not retain continuing authority to control emissions associated with the lands, facilities, title, or real properties” are also exempt from the provisions of 40 CFR 93.153. The proposed action involves transfer of the NMCRC property to the Port of Tacoma for reuse.

PROPOSED ACTION

Action Proponent: U.S. Navy

Location: Navy and Marine Corps Reserve Center (NMCRC) Tacoma

Proposed Action Name: Disposal and Redevelopment of NMCRC Tacoma

Proposed Action and Emissions Summary: The Proposed Action involves reuse of the NMCRC Tacoma property as an inclusion into the Port's Master Plan. In the near term, the Blair Peninsula is envisioned to engage in a comprehensive master redevelopment program transforming the existing industrial and commercial landscape into primarily international and domestic marine terminal facilities. The development plan includes road, rail, and utility infrastructure to support the marine terminals. In the immediate vicinity including the NMCRC site, the Port anticipates a new international container terminal. The NMCRC site is located near the functional center of the envisioned 168-acre (68 ha) container terminal. Elements of the planned Terminal's container yard, intermodal rail yard, truck gate, and a new public roadway (including overhead and underground utility infrastructure) are within the site's 9.03 acre (3.65 ha) footprint.

Existing utility infrastructure would either be abandoned in place, remain in place where feasible, or be relocated to accommodate the Port's full-buildout development plan for the Blair Peninsula. The utilities relocation would primarily occur in easements along the relocated Taylor Way corridor. Utilities would be above or below ground as required by code or by the direction of the utility provider.

A comprehensive transportation improvement program is a requirement to accommodate the anticipated growth and development of the Blair Peninsula. Improvements at the NMCRC Tacoma site would include roads and rail systems. It is envisioned that Taylor Way would be relocated. This would shift the roadway corridor adjacent to Hylebos Waterway, maintaining access to the existing land uses as well as the reconfigured and expanded Totem Ocean Trailer Express (TOTE) Terminal located immediately to the northwest. New intermodal working rail would be located on the NMCRC site to serve the Terminal. The intermodal yard would connect back to arrival/departure track and storage facilities located on the southern portion of the Peninsula. Rail access to existing rail-served customers would be maintained.

Air Emissions Summary: The Proposed Action would result in air emissions from construction and operational activities. Development of the NMCRC site would require the demolition of the existing buildings on site, site preparation activities, and paving. Emissions associated with these activities are calculated based on assumptions regarding the amount of demolition required, estimated timeframe for construction (2011 through 2013), and estimated equipment and workforce requirements.

It was assumed that operational emissions would occur following completion of construction activities in 2013. Operational emission estimates were based on assuming that a fraction of the activity on the terminal sites would occur on the NMCRC site. While only a portion of the 9.03-acre

site would be used for intermodal yard/container yard operations, for conservative purposes, it was assumed that the entire 9.03-acre site could be used by rail, heavy-duty trucks, cargo-handling equipment, or fleet vehicles. Emissions from these operations were assumed to be proportional to the emissions from the entire site.

Emissions were based on the *DRAFT Air Quality Discipline Report: Blair-Hylebos Terminal Redevelopment Project* (Widener and Associates, et al 2008), which is based on emission factors from the Puget Sound Maritime Air Emission Inventory (PSMAEI). According to the report, the TOTE terminal operations are expected to be unchanged by the Project and the relocated terminal is anticipated to have no increase in throughput capacity. It was therefore assumed that, while TOTE terminal operations would potentially be relocated to the NMCRC site, the relocation would not result in any emission increases. Emissions associated with the RRI include rail and truck emissions traveling on that portion of the rail and roadways that would be on the site, and those rail and truck emissions generated from site operations.

Based on the air quality analysis for the proposed action, the maximum estimated emissions would be below conformity *de minimis* levels (Table 2).

Table 2			
Estimated Total Net Project Emissions - Tons per Year			
Activity	Pollutant		
	CO	PM₁₀	PM_{2.5}
Construction	62.96	2.81	2.265
Operations	5.16	0.26	0.23
General Conformity <i>De minimis</i> Thresholds (Tons per year)	100	100	100
Exceed threshold?	No	No	No

Date RONA prepared: February 2, 2009

EMISSIONS EVALUATION AND CONCLUSION

The Proposed Action includes construction and operations associated with the Disposal and Redevelopment of NMCRC Tacoma. Emissions from heavy construction equipment were calculated based on the assumption that construction equipment would meet EPA Tier 1 standards. Emissions from heavy-duty on-road trucks that would transport debris and/or building materials to the site, and emissions from worker vehicles, were estimated based on the emission factors from the MOBILE6 emissions model (EPA 2002), assuming trucks would be represented by the HDDV7 vehicle category, and worker vehicles would be represented by the LDGT2 vehicle category. Fugitive dust emissions from construction were calculated based on EPA and South Coast Air Quality Management District emission factors (SCAQMD 1993).

Operational emissions from the Proposed Action were based on the *DRAFT Air Quality Discipline Report: Blair-Hylebos Terminal Redevelopment Project* (Widener and Associates, et al 2008), which is based on emission factors from the Puget Sound Maritime Air Emission Inventory (PSMAEI), assuming emissions from rail, heavy-duty trucks, cargo-handling equipment, or fleet vehicles would be proportional to the emissions from the entire site.

The Navy concludes that *de minimis* thresholds for applicable criteria pollutants would not be exceeded nor would the projected emissions be regionally significant (i.e., greater than 10 percent of the air basin's emission budgets) as a result of implementation of the Proposed Action. The emissions data supporting that conclusion is shown in Table 2 above, which is a summary of the calculations, methodology, data, and references included in the attachment to the RONA. Furthermore, this action involves transfer of land, facilities, title, and real properties through an enforceable contract or lease agreement where the delivery of the deed is required to occur promptly after a specific, reasonable condition is met, such as promptly after the land is certified as meeting the requirements of CERCLA, and where the Federal agency does not retain continuing authority to control emissions associated with the lands, facilities, title, or real properties. Therefore, the Navy concludes that further formal Conformity Determination procedures are not required, resulting in this Record of Non-Applicability.

RONA APPROVAL

Date: _____

Signature: _____