

Evaluation of Air Force and Army Categorical Exclusions for Air Quality

Air Force Civil Engineer Center, Environmental Quality Technical Support Branch (AFCEC/CZPQ)

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Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

// Signed //
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Appendix

ATTACHMENT A: WORST-CASE 5FT LINE CONSTRUCTION ACAM ANALYSIS

ATTACHMENT B: WORST-CASE PERSONNEL INCREASE ACAM ANALYSIS

ATTACHMENT C: WORST-CASE LARGE-SCALE CONSTRUCTION ACAM ANALYSIS

ATTACHMENT D: WORST-CASE DEMOLITION ACAM ANALYSIS

ATTACHMENT E: WORST-CASE PARKING LOT ACAM ANALYSIS

1 INTRODUCTION

The first level of the National Environmental Policy Act (NEPA) Process is Categorical Exclusions or CATEXs. A CATEX is a category of actions that a Federal agency has determined normally does not significantly affect the quality of the human environment (i.e., the natural and physical environment and the relationship of people with that environment; see NEPA section 102(2)(C)). Agencies develop a list of CATEX actions specific to their operation. If an action is considered categorically excluded (or CATEXed), then neither an Environmental Assessment (EA) nor an Environmental Impact Statement (EIS) is required (see NEPA section 106(a)(2)). If the proposed action is not included in the agency's CATEXed list of actions, then the agency must prepare an EA, EIS, or develop a new proposal that may qualify for a CATEX. An EA evaluates the potential impacts of the action, while an EIS is a more detailed analysis required for actions with significant effects. Alternatively, the agency may revise the proposal, so it meets criteria for a categorical exclusion.

Before applying any CATEX, the *Department of the Air Force* (DAF) must evaluate extraordinary circumstances, including air quality impacts. Even if the proposed action is on the agency's CATEX List, a CATEX cannot be applied if there are any extraordinary circumstances which can potentially result in significant environmental impacts. **Extraordinary circumstances potentially include, but are not limited to, situations where the action is proposed to occur in a National Ambient Air Quality Standard (NAAQS) designated nonattainment or maintenance area, or where the documentation of air impacts are insufficient to demonstrate that they are insignificant. Extraordinary circumstances may also include proximity to sensitive ecological areas, the presence of endangered species, or the potential for cumulative environmental impacts. Therefore, it is important for an agency to verify and document that no extraordinary circumstances exist that may cause the proposed action to potentially have a significant effect on a particular situation.**

Upon review and approval of the *Department of War NEPA Implementing Procedures* (DoW 2026) by the Council on Environmental Quality (CEQ), the category agency-specific actions are considered CATEXs (or CEs) and therefore do not require preparation of an EA, or EIS. The use of CATEXs is encouraged in CEQ guidance and by DAF to reduce unnecessary paperwork and to save time and resources; however, **an agency must evaluate a proposed action to ensure there are no extraordinary circumstances (in which a normally excluded action may have a significant effect) before a CATEX can be applied to the proposed action.**

Appendix A of DoW 2026 lists DoW CATEXs grouped by establishing agency. These CATEXs were identified primarily based on the environmental effect of previously implemented actions that have been determined to have insignificant impacts, simplistic scientific analyses, and expertise, experience, and judgement of professional staff in accordance with CEQ Guidance.

According to *Part 1.4 Categorical exclusions* of DoW 2026, "DoW including all DoW components is considered a single "Federal Agency" for the purposes of NEPA's CATEX provisions, regardless of the DoW component that originally established or adopted a given CATEX." Appendix A of the DoW 2026 states that:

> Categorical Exclusions (CATEXs) established by DOW, are hereby available for all of the DOW, as defined, to use regardless of original establishing agency (i.e., any DOW entity can use another DOW CATEX without having to go through the formal adoption process in the DOW NEPA Implementing Procedures) (Appendix A, DoW 2026).

Thus, the DoW, including all of its components, is considered a single "Federal Agency" for the purposes of NEPA's CATEX provisions. Accordingly, DAF may apply any CATEX listed in DoW 2026 Appendix A without formal adoption, regardless of the DoW component that originally established it. Though these CATEXs are now available for all DoW components, **DAF must still check for extraordinary circumstances (air quality is always a potential extraordinary circumstance) before using the desired CATEX in accordance with *Part 1.4 (d) Applying categorical exclusions* in DoW 2026, and for air quality, should consult this Guide for guidance**.

The use of previously implemented actions and simplistic scientific analyses for deriving the original DoW CATEXs was a broad assessment across all environmental concerns. Given the lack of standardized emissions estimating guidance and the limited emission estimating methods at the time the CATEXs were first derived, the CATEX evaluations for air quality relied heavily on expertise, experience, and judgement of professionals. Therefore, due to the lack of standardized emissions estimating guidance and the limited emission estimating methods available at the time, the original DoW CATEXs may not have fully addressed potential extraordinary circumstances associated with air quality impacts and should be revalidated to assess air quality impacts before being taken by the DAF.

This CATEX evaluation focuses exclusively on potential impacts to air quality (it does not account for non-air quality impacts) from each of the DAF and *Department of the Army* (DA) established CATEXs, and reevaluates potential extraordinary circumstances associated with the air quality impacts through an air quality extraordinary circumstance screening. Other DoW components' CATEXs will be evaluated in future iterations of this guide. **To take a CATEX not evaluated in this guide, contact the DAF Air Quality SME (AFCEC/CZPQ) to proceed.** This evaluation used the most current DAF standardized guidance for air emissions estimating (i.e., the Air Emissions Guide for Air Force Stationary, Mobile, and Transitory Sources), DAF emissions Insignificance Indicators, and the *Air Conformity Applicability Model* (ACAM). ACAM is a compilation of standard *Environmental Protection Agency* (EPA) approved methodologies (AP-42) and models for simple quantitative air quality impact assessment and air impact planning into one easy to use computer application.

2 CATEGORICALLY EXCLUDED ACTIONS

The three levels of a NEPA analysis/review are CATEX (or CE), EA, and EIS. The lowest level for a NEPA analysis is a CATEX analysis/review. A CATEX is a category of actions that a Federal agency has determined normally does not significantly affect the quality of the human environment (i.e., the natural and physical environment and the relationship of people with that environment; see NEPA section 102(2)(C)); therefore, the NEPA analysis/review is concluded at the lowest level and neither an EA nor an EIS is normally required. The use of CATEXs is

encouraged by CEQ regulations to reduce unnecessary paperwork and to save time and resources.

Review and documentation for actions that qualify for one or more CATEXs is generally minimal but must address any extraordinary circumstances (air quality is always a potential extraordinary circumstance) and any requirements of other environmental laws or executive orders. Though detailed NEPA documentation does not apply, requirements of other laws must be documented as appropriate.

Note, while according to DoW 2026 you are technically allowed to apply more than one CATEX to an action if there are no extraordinary circumstances or if the action will not result in reasonably foreseeable significant effects, applying two or more CATEXs involving air emissions is always a potential extraordinary circumstance for air quality that must be evaluated. In these cases, it is necessary to evaluate the net emissions through a *Level II, Quantitative Assessment*, for the air quality impacts of the entire action.

The DAF and DA-established CATEXs are listed below in *Table 2-1, DA CATEX Action List*, and *Table 2-2, DAF CATEX Action List*.

Table 2-1, DA CATEX Action List

Citation	CATEX Action
(a) Administrative operations	
DoW A1-1	Routine law and order activities performed by police, physical plant protection and security personnel, and civilian natural resources and environmental law officers. This includes defense support to civil authorities and search and rescue operations
DoW A2-2	Emergency or disaster assistance provided to Federal, State, or local entities.
DoW A3-3	Preparation, revision, and promulgation of regulations, policies, directives, procedures, manuals, and guidance documents that implement HQDA or other federal agency regulations, policy, procedures, manuals, and guidance documents that have been the subject of previous NEPA review or do not have substantial impacts on the environment.

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A4-4	Proposed administrative activities and operations to be conducted in an existing structure that are within the scope and compatibility of the present functional use of the structure. This includes all routine administrative functions of any kind; examples include, but are not limited, to military and civilian personnel recruitment, hiring, paying, supervision, and management; budgets, appropriations, and contracts planning, administration, and management; documents and records preparation, management, and distribution; investigations, inspections, analyses, and studies planning, execution, and documentation; educational and public outreach material development and distribution; and communications, briefs, and staffing actions.
DoW A5-5	Normal personnel, fiscal, and administrative activities involving military and civilian personnel (recruiting, processing, paying, and records keeping).
DoW A6-6	Routine management of buildings, facilities, utilities, training areas, and ranges in order to support routine use and enable timely maintenance and repair. This CX includes all management activities to enable and maintain the full functionality of the site.
DoW A7-7	Routine morale, welfare, and recreation activities not involving off-road recreational vehicles
DoW A8-8	Deployment of military forces on a temporary duty or training basis where existing facilities are used for their intended purposes consistent with the scope and size of existing mission.
DoW A9-9	Routine travel and movement of personnel, vehicles, watercraft, aircraft, equipment, and other materiel and commercial goods.
DoW A10-10	Approval of asbestos or lead-based paint management plans drafted in accordance with applicable laws and regulations (REC required).
DoW A11-11	Special events and routine community relations events, whether on or off the installation. These include educational, technical, advisory, and consultation activities where the Army engages with communities, government and private organizations and individuals, Federally recognized Indian tribes, and the general public. These include, for example, ceremonies, funerals (to include state funerals), open houses, town halls, air shows, athletic events, flyovers, Earth Day events, and concerts (REC required for air shows and flyovers).
DoW A12-12	Temporary closure or temporary restriction of access to roads, trails, recreational areas, and/or any lands within the boundaries of a military installation or within DoD real estate ease agreement land holdings in order to protect human or animal life, other natural or cultural resources, or for military training or security/law enforcement purposes (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A13-13	Reductions and realignments of civilian and/or military personnel that fall below the thresholds for actions reportable to Congress, as prescribed by statute (for example, 10 U.S.C. § 2687(a)(2) and 10 U.S.C. § 993). This includes reorganizations and reassignments with no changes in force structure, unit re-designations, and routine administrative reorganizations and consolidations (REC required when the net change in military and civilian authorizations at a military installation meets the threshold for forwarding a stationing package to the DCS, G–3/5/7).
DoW A14-14	Relocation of personnel into existing federally-owned (or state-owned in the case of ARNG) or commercially-leased space (REC required when the net change in military and civilian authorizations at a military installation meets the threshold for forwarding a stationing package to the DCS, G–3/5/7).
DoW A15-15	An Army action occurring on another military service's property where the action qualifies for a CX of that military service, or for actions on property designated as a Joint Base or Joint Region that qualifies for a CX of any of the military services included as part of the Joint Base or Joint Region. When the Army proponent chooses to use another military service's CX to cover a proposed action, the proponent must have verification that the other service does not object to using their CX to cover the Army action. The Army proponent will include that verification in the administrative record for the proposed action. The Army official making the CX determination must ensure the application of the CX is appropriate and that the Army proposed action was a type contemplated when the CX was established by the other service, and that no extraordinary circumstances exist (REC required).
DoW A16-16	Army adoption and application of another Federal agency's CX to proposed Army actions. Other Federal agency's CXs may be adopted and applied by Army proponents to any proposed Army action occurring on or off Army property, on another Federal agency's property, or on property where another Federal agency is operating, when the proposed Army action is substantially the same as an action that is categorically excluded by another Federal agency. A proposed Army action is substantially the same as an action categorically excluded by another Federal agency's CX when it is of a similar type and scope as the action categorically excluded by another Federal agency, and no extraordinary circumstances exist. If the Army chooses to apply another Federal agency's CX to address a proposed Army action, the Army proponent must document confirmation that the other Federal agency does not object to the Army's use of their CX to address the proposed Army action. The Army proponent will document confirmation that the other Federal agency does not object to the Army's use of their CX in the REC prepared for the proposed Army action (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
(b) Construction and demolition	
DoW A17-1	Construction of new, alteration of existing (to include replacement or upgrades), and additions to existing buildings, facilities, structures (to include towers that do not present a collision hazard to military aircraft), launch pads, utility systems, and communication systems on previously disturbed land and/or on undisturbed land, provided there are no more than five total (contiguous or non-contiguous) acres of surface disturbance to undisturbed land (REC required). This does not include construction of facilities intended primarily for the transportation, distribution, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste. Previously disturbed land has been changed such that its ecological processes have been and remain altered by human activity and encompasses areas that have been transformed from native vegetation to nonnative species or a managed state. Undisturbed land in its natural state or land which has reverted to its natural state where ecological processes remain unattended by human activity.
DoW A18-2	Construction of new and expansion of existing parking lots and hardening of tank trails and turn pads on previously disturbed land and/or on undisturbed land, provided there are no more than 5 total acres of surface disturbance to undisturbed land. If a parking lot design will replicate the pre-development hydrology, limitation may be extended to 10 acres (REC required).
DoW A19-3	Placement and replacement of targetry and other stationary equipment on existing ranges provided there are no more than 5 total acres of surface disturbance to undisturbed land (REC required).
DoW A20-4	Installation of fencing, utility systems, and communication systems that use existing right-of-way, and installation of airfield communication and safety equipment (REC required).
DoW A21-5	Construction, placement, installation, or relocation of machinery and equipment (for example, analytical laboratory apparatus, electronic hardware, maintenance equipment, and health and safety equipment) from another site or structure to the new or altered building/facility/site, assuming the uses of the relocated items will be similar to their former uses (REC required).
DoW A22-6	Demolition of buildings, structures, or other improvements and disposal of debris therefrom, or removal of a part thereof for disposal, in accordance with applicable requirements, to include requirements associated with removal of asbestos, polychlorinated biphenyls (PCBs), lead-based paint, and other special hazards. For historic districts, sites, buildings, structures, or objects eligible for or included in the National Register of Historic Places, all requirements of the NHPA (National Historic Preservation Act) must be met (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A23-7	Road, firebreak, or trail construction on existing rights-of-ways or on previously disturbed areas to dimensions that meet design standards that permit safe vehicle operation.
DoW A24-8	Construction, in accordance with applicable permits, of new or improved low water crossing and fording areas on existing trails or roads used for training purposes, and storm water conveyances for storm water management, safety, and other purposes. Construction or improvements must permit the flow of water across the crossing/fording. Total ground area disturbed per low water crossing area must not exceed 5 acres (REC required).
DoW A25-9	Minor renovations and additions, in accordance with applicable permits, to waterfront facilities, including mooring piles, fixed floating piers, existing piers, unburied power cables, and maintenance and replacement of existing oil booms. (REC required).
DoW A26-10	Actions in unsewered areas on lands within the boundaries of a military installation or within DoD real estate lease agreement land holdings involving the replacement of existing small (total capacity less than approximately 250,000 gallons per day) on-site wastewater and sewage systems, providing the new onsite systems do not relocate existing discharge (REC required).
DoW A27-11	Construction or installation, to include modification, of fencing, gates, grates, walls, small enclosures, stakes, signage, cattle guards, and other small appurtenances or devices (for example, raptor electrocution prevention devices) attached to the land for the purposes of security or to otherwise protect human life, animal life, or other resources.
DoW A28-12	Construction and modernization of common small arms ranges on previous or existing range sites in Army training and testing areas requiring total disturbance of approximately 40 acres or less, without change to noise contours that would potentially increase noise impacts to sensitive receptors and without change to existing Surface Danger Zones (SDZs). This includes the construction of a Range Operations Control Area, which contains common range support facilities and parking. This CX also includes the demolition of any old structures on the previously disturbed sites. Small arms ranges typically include weapons that fire ammunition that is .50 caliber or less and hand or launched grenades (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A29-13	Reconstruction, repair, restoration, retrofitting, or replacement of any facility, structure, road, or trail (including fencing, gates, parking lots, erosion control structures, storm water control structures, roads, trails, revegetation, removal of debris, or any other infrastructure improvement), that was in use and operation, or was under construction, and was damaged or destroyed due to a natural event, including but not limited to wildfires, floods, earthquakes, landslides, weather events; or an accident, vandalism, or an act of terrorism; and which will substantially conform to the preexisting design, function, and location as the original (REC required; will include consideration of anticipated temporary construction impacts).
(c) Cultural and natural resources	
DoW A30-1	Regeneration of an area to native tree species and other native vegetation species including: site preparation; post-fire rehabilitation activities (such as tree planting, fence replacement, or habitat restoration); timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides and do not require more than 1 mile of road construction; and restoration of wetlands, streams, riparian areas, and other water bodies.(REC required). This does not include forestry operations (see § 32 CFR 651.12 (d)(7)).
DoW A31-2	Implementation of hunting and fishing policies or regulations that are consistent with state and local regulations and Tribal treaty rights.
DoW A32-3	Scientific studies, surveys, data collection, monitoring, and information gathering activities that are minimally intrusive to the environment. Examples include, but are not limited to topographic surveys; bird counts; wetland mapping; use of remote sensing technologies; geophysical investigations using sonar; inventories, evaluation, and mitigation for historic properties in accordance with NHPA; other cultural and natural resource surveys, inventories, monitoring, and investigations; and geotechnical testing to support pre- construction investigations and facility design when the geotechnical testing technology used is minimally intrusive to the environment (REC required).
DoW A33-4	Maintenance, repair, and replacement in kind of archaeological, historical, and endangered/threatened species avoidance markers, fencing, and signs; and maintenance, repair, and replacement in kind of existing fencing to provide improved wildlife ingress and egress.
DoW A34-5	Update and implementation of Integrated Natural Resources Management Plans (INRMPs) and Integrated Cultural Resources Management Plans (ICRMPs), where plan update and implementation activities are similar in type, scope, and degree to those currently allowed and result in no new adverse effects on the environment (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A35-6	Actions to find, contain, and eradicate localized populations of invasive species using control mechanisms listed in the installation Integrated Pest Management Plan (IPMP), provided the invasive species control mechanism affects an area 250 total acres or less in size (REC required).
DoW A36-7	Forestry and associated operations focused on the harvest and planting of live trees not to exceed 70 acres. Salvage of dead or dying trees (and adjacent live trees) not to exceed 250 acres to control disease or the spread of insect infestation. Associated operations include no more than 0.5 mile of temporary road construction, and seeding or reforestation of timber areas (REC required).
DoW A37-8	Prescribed burning not to exceed 4,500 acres per prescribed burn project, and mechanical vegetation removal not to exceed 1,000 acres per vegetation removal project, for the purposes of: reducing the risks and severity of wildland fires and fires resulting from Army mission activities; and enhancing the biodiversity, stability, and productivity of the natural environment (REC required).
(d) Procurement and product modifications	
DoW A38-1	Routine procurement of goods and other services (complying with applicable procedures for procurement of sustainable goods and services) to support operations and infrastructure, and routine utility services and contracts.
DoW A39-2	Procurement, installation or replacement, or operation of utility and communication systems, mobile antennas, data processing equipment and similar electronic equipment that use existing right-of-way, easement, distribution systems, and/or facilities (REC required).
DoW A40-3	Conversion of commercial activities to military activities. This includes only those actions that do not change the actions or the missions of the organization or alter the existing land use patterns.
DoW A41-4	Modification, product improvement, or configuration engineering design change to materiel, structure, or item that does not change the original impact of the materiel, structure, or item on the environment (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A42-5	Procurement, testing, use, and/or conversion of a commercially available product or non-developmental item (NDI). (A NDI is any previously developed item of supply used exclusively for government purposes by a Federal Agency, a State or local government, or a foreign government with which the United States has a mutual defense cooperation agreement; any item described above that requires only minor modifications or modifications of the type customarily available in the commercial marketplace in order to meet the requirements of the processing department or agency. Such items for example include, forklift, chain saw, security monitoring equipment, software, automobile, commercially-available heavy equipment, etc.) that do not result in any unusual disposal requirements.
DoW A43-6	Acquisition or contracting for spares and spare parts, consistent with the approved Technical Data Package (TDP).
DoW A44-7	Modification and adaptation of commercially available products and non-developmental items for military application (for example, sportsman's products and wear such as holsters, shotguns, side arms, protective shields, clothing, backpacks, etc.), as long as modifications do not alter the normal impact to the environment from similar military equipment (REC required).
DoW A45-8	Adaptation of non-lethal munitions and restraints from law enforcement suppliers and industry (for example, rubber bullets, stun grenades, and smoke bombs) for military police and crowd control activities where there is no change from the original product design and there are no unusual disposal requirements; the development and use by the military of non-lethal munitions and restraints that are similar to those used by local police forces and in which there are no unusual disposal requirements (REC required).
(e) Real estate transactions	
DoW A46-1	Grants, acquisitions, or terminations of leases, licenses, easements, permits for use of real property or facilities, and land withdrawal continuances or extensions that merely establish time periods in which there is no significant change in land or facility use (REC required).
DoW A47-2	Disposal of excess easement areas to the underlying fee owner (REC required).
DoW A48-3	Transfer of real property administrative control within the Army, to another military department, or to other federal agency, including the return of public domain lands to the Department of Interior, and reporting of property as excess and surplus to the General Services Administration (GSA) for disposal (REC required).
DoW A49-4	Transfer of active installation utilities to a commercial or governmental utility provider, except for systems on property that has been declared excess and proposed for disposal (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A50-5	Acquisition of real property (including facilities) where the land use will not change substantially, or where the land acquired will not exceed 40 acres and the use will be similar to Army activities on adjacent land (REC required).
DoW A51-6	Disposal of real property (including facilities) by the Army where the reasonably foreseeable use will not change significantly (REC required).
DoW A52-7	Agreements entered into with an eligible entity or entities under the Army Compatible Use Buffer (ACUB) program, in accordance with 10 U.S.C. § 2684a or under other applicable authorities, that address the use or development of real property in the vicinity of, or ecologically related to, a military installation or military airspace for purposes of limiting any development or use of the property that would be incompatible with the mission of the military installation and/or preserving habitat and cultural resources on the property that may eliminate or relieve current or anticipated restrictions on military testing, training or operations and for which there is no significant change of land use (REC required).
(f) Maintenance, repair, and infrastructure operations	
DoW A53-1	Routine repair and maintenance of buildings, facilities, launch pads, structures, utility/communication systems, airfields, grounds, parking areas, targetry and other stationary equipment on existing ranges, and fencing; includes associated components and equipment. Examples include, but are not limited to, custodial services performed on existing facilities, removal and disposal of asbestos-containing material (for example, roof material and floor tile) or lead-based paint in accordance with applicable regulations; removal of dead, diseased, or damaged trees; and repair of roofs, doors, windows, or fixtures (REC required for removal and disposal of asbestos-containing material and lead-based paint. REC required for work on structures eligible for or listed in the National Register of Historic Places and structures that are 50 years of age that have not been formally evaluated for historic significance where impacts to such environmentally sensitive resources have been resolved in accordance with NHPA Section 106 regulatory procedures).
DoW A54-2	Routine repairs and maintenance of existing roads, trails, and firebreaks. Examples include, but are not limited to, grading and clearing the roadside of brush with or without the use of herbicides; resurfacing a road to its original conditions; pruning vegetation; removal of dead, diseased, or damaged trees; replacing or cleaning culverts; and conducting minor soil stabilization activities.

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A55-3	Routine installation, repair, and maintenance of equipment and vehicles (for example, wheeled vehicles, tractors, lawn equipment, airfield equipment [such as runway visual range equipment and visual approach slope indicators], and military vehicles, equipment, and systems) that is substantially the same as that routinely performed by private sector owners and operators of similar equipment and vehicles. This does not include depot maintenance of unique military equipment.
DoW A56-4	Repair and maintenance (including replacement and upgrade of parts), and decontamination operations for military equipment conducted at existing enclosed facilities, to include contractor-operated/owned enclosed facilities, consistent with previously established safety levels and in compliance with applicable Federal, State, and local requirements (REC required if proposed action entails a new/modified repair/maintenance operation effecting equipment containing munitions, explosives, or hazardous material, and the operation was not implemented at the enclosed facility during the preceding 5 years; REC required if the proposed action necessitates a new permit or change in an existing permit).
DoW A57-5	Land repair and maintenance projects for the purpose of mitigating the effects of military training exercises. Examples include, but are not limited to: soil stabilization through revegetation; installing and maintaining erosion control measures; gulley and ravine stabilization; control of invasive vegetation; maintenance of existing structures such as culverts, terraces, and sediment control structures; and maintenance of improved surfaces that are part of the training landscape (REC required).
DoW A58-6	Routine maintenance of streams and ditches or other rainwater conveyance structures and erosion control and stormwater control structures (REC required).
DoW A59-7	Development, adoption, update, and implementation of an installation pesticide, fungicide, herbicide, insecticide, and rodenticide-use program and plan (IPMP). The IPMP will provide for application of such substances approved for use by the appropriate regulatory agency when the application of such substances is implemented in accordance with the manufacturer's label directions, the IPMP, and INRMP as applicable. (REC required). This categorical exclusion does not apply to implementation of aerial spraying).
DoW A60-8	Closure, decommissioning, mothballing, disconnection, and similar discontinued use of facilities, equipment, vehicles, aircraft, watercraft, and utility and communication systems, whether temporary or permanent (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
(g) Waste, hazardous materials, hazardous waste, and excess material and equipment	
DoW A61-1	Use of gauging devices, analytical instruments, and other devices containing sealed radiological sources; use of industrial radiography; use of radioactive material in medical and veterinary practices; possession of radioactive material incident to performing services such as installation, maintenance, leak tests, and calibration; use of uranium as shielding material in containers or devices; and radioactive tracers (REC required).
DoW A62-2	Immediate responses in accordance with emergency response plans (for example, Spill Prevention, Control, and Countermeasure Plan (SPCCP)/Installation Spill Contingency Plan (ISCP), and Chemical Accident and Incident Response Plan) for release or discharge of oil, hazardous materials or hazardous substances; and emergency actions taken by Explosive Ordnance Demolition (EOD) detachment or Technical Escort Unit.
DoW A63-3	Sampling, surveying, well drilling and installation, analytical testing, site preparation, and intrusive testing to determine if hazardous wastes, contaminants, pollutants, or special hazards are present (REC required). No REC required for CERCLA responses or RCRA corrective actions.
DoW A64-4	Routine management to include the use of hazardous material or waste inventory management systems, transportation, distribution, use, storage, treatment, disposal, recycling, and other waste management activities for solid waste, hazardous waste, medical waste, radiological waste, and special hazards
DoW A65-5	Reutilization, marketing, distribution, donation, and resale of items, personal property, equipment, and materiel, to include normal transfer of items to the Defense Logistics Agency; items, personal property, equipment, and materiel that have been contaminated with hazardous materials or wastes but will be adequately cleaned and will conform to the applicable regulatory agency's requirements
(h) Training; research, development, engineering, testing, evaluation and demonstration; manufacturing operations, and human systems integration	
DoW A66-1	Training entirely of an administrative or classroom nature

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A67-2	Military training, materiel and systems research, development, engineering, testing, evaluation, and demonstration, and materiel and systems fielding activities conducted in or on existing military structures, ranges, maneuver areas, training areas and access controlled facilities that are: i. Compatible with the current use of existing military structures, ranges, maneuver areas, training areas, and access controlled facilities; ii. Similar in type, degree, and setting to ongoing military activities; and iii. Are conducted in accordance with applicable plans and standard operating procedures protective of the environment. iv. And include but are not limited to: live fire; use of existing SDZs and impact areas; emergency response training; use of missile, rocket and artillery-type projectiles; survivability and vulnerability testing; safety and engineering drills; training exercise modification on a Military Operations in Urban Terrain site or in a shoot house; simulated war games (at existing facilities); and tactical and logistical exercises involving brigade size units or smaller (REC required).
DoW A68-3	Intermittent on-post training activities (or offpost training covered by an ARNG land use agreement) that include, but are not limited to, land navigation, physical training, FAA approved aerial overflights, and small unit level training.
DoW A69-4	Flying activities, to include manned and unmanned aerial vehicle (UAV) flights, and other airspace use activities (for example, missile and projectile flights) in compliance with FAA regulations and in accordance with normal flight patterns and elevations for that facility/installation.
DoW A70-5	Infrequent and temporary increases in air operations that do not exceed 50 percent of the typical installation aircraft operations rate or 50 additional operations per day. Repetitive use of this CX may require further analysis to determine there are no significant impacts (REC required).
DoW A71-6	Operation of small arms ranges on Army lands of approximately 40 acres or less in size, without change to noise contours that would potentially increase noise impacts to sensitive receptors and/or without change to existing SDZs, if operation includes appropriate monitoring for potential offrange impacts (for example, under the Operational Range Assessment Program or similar procedures). Small arms ranges typically include weapons that fire conventional ammunition that is 0.50 caliber or less and hand or launched grenades. Includes operation of existing recreational small arms ranges on installations. (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A72-7	Routine operation and use of radar, sonar, laser, telemetry, and other systems that make use of the electromagnetic spectrum for detection, tracking, navigation, range-finding, targeting, communications, or other military purposes, within the boundaries of a military installation, boundaries of a DoW real estate lease agreement land holding, and/or existing airspace currently used for military training. Operation must conform to current American National Standards Institute/Institute of Electrical and Electronics Engineers guidelines for maximum permissible exposure to electromagnetic fields (REC required).
DoW A73-8	Research (basic and applied), testing, other RDT&E, production/repair operations, and manufacturing operations conducted at existing enclosed facilities to include contractor-operated/owned laboratories and other enclosed facilities, consistent with previously established safety levels (REC required if the proposed action involves the use of munitions and explosives of concern or hazardous material and the constituent was not used at the enclosed facility during the preceding 5 years, or if the proposed action is expected to release radiation).
DoW A74-9	New research, development, testing, and evaluation activities conducted at established laboratories or manufacturing and maintenance facilities (including contractor-operated laboratories and facilities) of a similar type, nature, and scope as the prior or existing research, development, testing, and evaluation activities on the facility.
DoW A75-10	Testing, evaluation, and demonstration of Soldier equipment, to include the operator, maintainer, and supporter, and support facilities, that provide for protection of the Soldier and the delivery of required ammunition, cargo, unit equipment, and shelters. Soldier support activities include the transportability testing of mobile facilities that include evaluation of weight, center of gravity, tilt table, and lane change, initial inspection, safety, weight, rail impact, mobility testing, drop test, and final inspection. Testing also includes evaluation of the Lightweight Chemical-Biological Protection, including collective protection and detection equipment, to determine the durability of the Soldier-worn materials and to gain wearability data, including mock training exercises (REC required).
DoW A76-11	Testing, evaluation, and demonstration of small scale Army equipment with similar constituents and use as commercially available equipment (for example, backpacks, batteries, radios, flashlights, helmets, clothing, shoes, Global Positioning Systems, containers, test kits, respirators, netting, tents, stretchers, splints, and medical equipment).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A77-12	Flight testing, evaluation, and demonstration of surface-to-surface, air-to-surface, surface-to-air, and air-to-air rockets, missiles, and medium and large caliber ammunition or artillery-type projectiles where: (i) the projectile launch, flight, landing, and vehicle/payload recovery occurs solely within the boundaries of a military installation or within DoW real estate lease agreement land holdings; (ii) the entire flight from launch to landing occurs over an established range designated for testing of such projectiles; (iii) landing and recovery, when feasible, of boosters, (surface) projectiles, payload, aerial targets and/or related debris occurs within a designated impact area (such as a warhead impact target area); and (iv) recovery operations will be coordinated with explosive ordnance disposal (EOD) personnel to ensure test debris is rendered harmless to human health and safety prior to recovery. This CX does not apply to the testing, evaluation, or demonstration of projectiles with payloads designed to release radiological, nuclear, and high-yield explosives or other types of payloads that could cause significant harm to human health and/or the environment if released (REC required).
DoW A78-13	Testing, evaluation, and demonstration of man portable, individual, and crew served weapons systems used principally against personnel and lightly armored targets, to include both ballistic and non-ballistic systems and associated ordnance, munitions, aiming, powering, storage, training, specialized maintenance equipment, logistic support, and other ancillary items where: (i) the small arms firing occurs solely within the boundaries of a military installation; (ii) the entire firing occurs over an established range designated for testing of small arms; and (iii) landing and recovery, when feasible, of munitions and/or debris occurs within a designated impact area (REC required).
DoW A79-14	Testing, evaluation, and demonstration of mortars on military installations including: (i)general support, weapon system testing, production qualifications testing, mortar detection and data acquisition, proof assembly testing, acceptance testing, classification testing, and mortar technology demonstrations; (ii) general support for mortars testing requiring small arms firing, grenade launcher firing, and rocket propelled grenades firing when launch, flight, and impact occur on designated ranges; or (iii) final classification testing, including static functioning of test items in a boxed and stacked configuration when launch, flight, and/or impact/detonation occur on designated ranges (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A80-15	Automotive testing involving testing, evaluation, and demonstration of automotive performance, transportability, reliability, human factors engineering and all applicable human systems integration domains, rail impact, lift and tie-down, tilt table, braking, steering and handling, side slopes, longitudinal slopes, gradeability, acceleration, and standard obstacles. Testing also includes: i. testing mobile equipment which includes weight and center of gravity, tilt table, and lane change; ii. automotive performance tests accomplished in environmental chambers or in existing outdoor testing area, including blowing rain and sand tests and transportability tests (lift provision compression test, helicopter flight, and rail impact); iii. specific automotive testing measuring for weight, center of gravity, and moment of inertia, and tire, track, and suspension dynamic and static properties; iv. testing of automotive trailers for resistance to towing; and v. performance vehicles tested for speed and acceleration, gradeability and side slopes, standard obstacles, transportability, fuel consumption, full load cooling, environmental performance, ride quality, winching, braking, steering and handling, towing compatibility, human factors, and material handling cranes (REC required).
DoW A81-16	Testing, evaluation, and demonstration of robotic vehicles, to include Unmanned Ground Vehicle (UGV). Testing includes scenarios that: (i) test UGVs and Soldiers individually; (ii)test the interface between UGVs and Soldiers in mounted and dismounted maneuvers on existing test grids and training ranges, including navigation and identification of obstacles, targets, and hazards; (iii) test vehicles on existing test courses and existing improved surfaces; and (iv) test vehicles operating in test chambers while subjected to environmental conditions (REC required).

Table 2-1, DA CATEX Action List (cont.)

Citation	CATEX Action
DoW A82-17	Testing, evaluation, and demonstration of UAV and associated technologies. Testing includes scenarios in which (i) the UAV is: launched, operated, landed, and recovered solely within land boundaries of a military installation or within DoD real estate lease agreement land holdings; (ii) the entire flight from launch to landing occurs over an established range designed for testing of such systems; (iii) the entire flight from launch to landing occurs within DoD controlled airspace; and (iv) landing and recovery of UAVs, and recovery, when feasible, of associated test materials including munitions occurs within a designated test range or impact area (REC required).

Note:
"REC required" indicates action require a Record of Environmental Consideration
"CX" is an abbreviation for Categorical Exclusion

Table 2-2, DAF CATEX Action List

Citation	CATEX Action
DoW A83-1	Routine procurement of goods and services.
DoW A84-2	Routine Commissary and Exchange operations.
DoW A85-3	Routine recreational and welfare activities.
DoW A86-4	Normal personnel, fiscal or budgeting, and administrative activities and decisions including those involving military and civilian personnel (for example, recruiting, processing, paying, and records keeping).
DoW A87-5	Preparing, revising, or adopting regulations, instructions, directives, or guidance documents that do not, themselves, result in an action being taken.
DoW A88-6	Preparing, revising, or adopting regulations, instructions, directives, or guidance documents that implement (without substantial change) the regulations, instructions, directives, or guidance documents from higher headquarters or other Federal agencies with superior subject matter jurisdiction.
DoW A89-7	Continuation or resumption of pre-existing actions, where there is no substantial change in existing conditions or existing land uses and where the actions were originally evaluated in accordance with applicable law and regulations, and surrounding circumstances have not changed.
DoW A90-8	Performing interior and exterior construction within the 5-foot line of a building without changing the land use of the existing building.
DoW A91-9	Repairing and replacing real property installed equipment.
DoW A92-10	Routine facility maintenance and repair that does not involve disturbing significant quantities of hazardous materials such as asbestos and lead-based paint.
DoW A93-11	Actions similar to other actions which have been determined to have an insignificant impact in a similar setting as established in an EIS or an EA resulting in a FONSI. The EPF (Environmental Planning Function) must document application of this CATEX on AF Form 813, specifically identifying the previous Air Force approved environmental document which provides the basis for this determination.
DoW A94-12	Installing, operating, modifying, and routinely repairing and replacing utility and communications systems, data processing cable, and similar electronic equipment that use existing rights of way, easements, distribution systems, or facilities.
DoW A95-13	Installing or modifying airfield operational equipment (such as runway visual range equipment, visual glide path systems, and remote transmitter or receiver facilities) on airfield property and usually accessible only to maintenance personnel.

Table 2-2, DAF CATEX Action List (cont.)

Citation	CATEX Action
DoW A96-14	Installing on previously developed land, equipment that does not substantially alter land use (i.e., land use of more than one acre). This includes outgrants to private lessees for similar construction. The EPF must document application of this CATEX on AF Form 813.
DoW A97-15	Laying-away or mothballing a production facility or adopting a reduced maintenance level at a closing installation when (1) agreement on any required historic preservation effort has been reached with the state historic preservation officer and the Advisory Council on Historic Preservation, and (2) no degradation in the environmental restoration program will occur.
DoW A98-16	Acquiring land and in grants (50 acres or less) for activities otherwise subject to CATEX. The EPF must document application of this CATEX on AF Form 813.
DoW A99-17	Transferring land, facilities, and personal property for which the General Services Administration (GSA) is the action agency. Such transfers are excluded only if there is no change in land use and GSA complies with its NEPA requirements.
DoW A100-18	Transferring administrative control of real property within the Air Force or to another military department or to another Federal agency, not including GSA, including returning public domain lands to the Department of the Interior.
DoW A101-19	Granting easements, leases, licenses, rights of entry, and permits to use Air Force controlled property for activities that, if conducted by the Air Force, could be categorically excluded in accordance with this Appendix. The EPF must document application of this CATEX on AF Form 813. (See TAB B)
DoW A102-20	Converting in-house services to contract services.
DoW A103-21	Routine personnel decreases and increases, including work force conversion to either on-base contractor operation or to military operation from contractor operation (excluding base closure and realignment actions which are subject to congressional reporting under 10 U.S.C. 2687).
DoW A104-22	Routine, temporary movement of personnel, including deployments of personnel on a TDY basis where existing facilities are used.
DoW A105-23	Personnel reductions resulting from workload adjustments, reduced personnel funding levels, skill imbalances, or other similar causes.
DoW A106-24	Study efforts that involve no commitment of resources other than personnel and funding allocations.

Table 2-2, DAF CATEX Action List (cont.)

Citation	CATEX Action
DoW A107-25	The analysis and assessment of the natural environment without altering it (inspections, audits, surveys, investigations). This CATEX includes the granting of any permits necessary for such surveys, provided that the technology or procedure involved is well understood and there are no adverse environmental impacts anticipated from it. The EPF must document application of this CATEX on AF Form 813.
DoW A108-26	Undertaking specific investigatory activities to support remedial action activities for purposes of cleanup of Environmental Restoration Account (ERA)—Air Force and Resource Conservation and Recovery Act (RCRA) corrective action sites. These activities include soil borings and sampling, installation, and operation of test or monitoring wells. This CATEX applies to studies that assist in determining final cleanup actions when they are conducted in accordance with legal agreements, administrative orders, or work plans previously agreed to by EPA or state regulators.
DoW A109-27	Normal or routine basic and applied scientific research confined to the laboratory and in compliance with all applicable safety, environmental, and natural resource conservation laws.
DoW A110-28	Routine transporting of hazardous materials and wastes in accordance with applicable Federal, state, interstate, and local laws.
DoW A111-29	Emergency handling and transporting of small quantities of chemical surety material or suspected chemical surety material, whether or not classified as hazardous or toxic waste, from a discovery site to a permitted storage, treatment, or disposal facility.
DoW A112-30	Immediate responses to the release or discharge of oil or hazardous materials in accordance with an approved Spill Prevention and Response Plan or Spill Contingency Plan or that are otherwise consistent with the requirements of the National Contingency Plan.
DoW A113-31	Relocating a small number of aircraft to an installation with similar aircraft that does not result in a significant increase of total flying hours or the total number of aircraft operations, a change in flight tracks, or an increase in permanent personnel or logistics support requirements at the receiving installation. Repetitive use of this CATEX at an installation requires further analysis to determine there are no cumulative impacts. The EPF must document application of this CATEX on AF Form 813.
DoW A114-32	Temporary (for less than 30 days) increases in air operations up to 50 percent of the typical installation aircraft operation rate or increases of 50 operations a day, whichever is greater. Repetitive use of this CATEX at an installation requires further analysis to determine there are no cumulative impacts.

Table 2-2, DAF CATEX Action List (cont.)

Citation	CATEX Action
DoW A115-33	Flying activities that comply with the Federal aviation regulations, that are dispersed over a wide area and that do not frequently (more than once a day) pass near the same ground points. This CATEX does not cover regular activity on established routes or within special use airspace.
DoW A116-34	Supersonic flying operations over land and above 30,000 feet MSL, or over water and above 10,000 feet MSL and more than 15 nautical miles from land.
DoW A117-35	Formal requests to the FAA, or host-nation equivalent agency, to establish or modify special use airspace (for example, restricted areas, warning areas, military operating areas) and military training routes for subsonic operations that have a base altitude of 3,000 feet above ground level or higher. The EPF must document application of this CATEX on AF Form 813, which must accompany the request to the FAA.
DoW A118-36	Adopting airfield approach, departure, and enroute procedures that are less than 3,000 feet above ground level, and that also do not route air traffic over noise-sensitive areas, including residential neighborhoods or cultural, historical, and outdoor recreational areas. The EPF may categorically exclude such air traffic patterns at or greater than 3,000 feet above ground level regardless of underlying land use.
DoW A119-37	Participating in "air shows" and fly-overs by Air Force aircraft at non-Air Force public events after obtaining FAA coordination and approval.
DoW A120-38	Conducting Air Force "open houses" and similar events, including air shows, golf tournaments, home shows, and the like, where crowds gather at an Air Force installation, so long as crowd and traffic control, etc., have not in the past presented significant safety or environmental impacts

3 AIR QUALITY IMPACT ANALYSIS

The Air Quality Impact Analysis (AQIA) differs from other environmental resources or media being assessed under NEPA (e.g., water resources, biological resources, cultural resources, geological/soil resources, noise, solid waste, hazardous waste, and safety) because AQIA incorporates an additional and legally separate impact assessment for the Clean Air Act's General Conformity Rule when proposed actions fall within areas that are designated nonattainment or maintenance for any NAAQSs (*DAF Air Quality Impacts Analysis (AQIA) Guide – Fundamentals March 2026*, AQIA 2026).

The primary NEPA or General Conformity Rule air quality impact analysis (i.e., Level II, Quantitative Air Quality Assessment) is a net-change inventory analysis. According to DAF guidance, CEQ NEPA implementing guidance, and the General Conformity Rule (40 CFR 93 Subpart B), a net-change inventory analysis is an inventory of "effects or impacts" which only includes the emission sources/activities that will add to or reduce direct or indirect emissions (i.e., net change). The starting point (baseline) for a net change inventory analysis is zero or the

current situation (i.e., emissions that would occur without the proposed action are not included and the most recent Air Emissions Inventory should not be used).

According to 40 CFR 93.153(b), General Conformity dictates the evaluation of "the total of direct and indirect emissions for only criteria pollutants and/or precursors failing to meet the project area's NAAQSs." 40 CFR 93.152 defines "Total of direct and indirect emissions" as the "sum of direct and indirect emissions increases and decreases caused by the Federal action; i.e., the 'net' emissions considering all direct and indirect emissions." Similarly, according to DoW 2026, NEPA dictates the evaluation of "changes [net change] to the human environment from the proposed action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives." While NEPA evaluates reasonably foreseeable environmental effects, General Conformity specifically evaluates whether reasonably foreseeable emissions from a federal action conform to the State Implementation Plan (SIP). Both rely on net change emissions. Therefore, NEPA/Conformity analyses should only include reasonably foreseeable emission sources/activities that will add to or reduce direct or indirect emissions (i.e., net change) of criteria pollutants or their defined precursor.

For more information on AQIA, see the latest issue of *DAF Air Quality Impacts Analysis (AQIA) Guide – Fundamentals*.

4 REQUIREMENTS FOR USING A CATEX

As the first level of a NEPA assessment, an agency determines if an agency-specific CATEX covers a proposed action. According to CEQ guidance (*Establishing, Revising, Adopting, and Applying Categorical Exclusions Under the National Environmental Policy Act*), applying a CATEX is not solely determining if a proposed action fits within the description of the CATEX; rather the agency must also consider whether there are extraordinary circumstances that would warrant further NEPA review (CEQ 2026).

To use a CATEX, the proponent must satisfy the following two screening conditions:

(1) The proposed action has not been segmented, meaning the entire action is considered as a whole rather than in separate parts. Segmentation refers to dividing a project into smaller parts to reduce the apparent environmental impact. CATEX categories are specific types of actions that do not require detailed environmental analysis under NEPA. An action may not be narrowly defined to minimize the potential impacts to avoid a higher level of NEPA documentation, which refers to the process required to assess environmental effects in detail. If one action is not taken unless another is taken, then both actions should be considered as portions of a single action. For instance, if a road construction project would only proceed if a bridge were also built, both should be evaluated together rather than separately to ensure all impacts are considered.

(2) No extraordinary circumstances exist. The proponent must evaluate an apparently applicable CATEX to the proposed action for extraordinary circumstances in which the normally CATEXed action may have a significant effect (DoW 2026, Part 1.4(d)).

a. If an extraordinary circumstance **is not present**, the agency may CATEX the proposed action.

b. If an extraordinary circumstance **is present, then either**:

i. The agency nevertheless may CATEX the proposed action if the agency can modify the action to avoid the reasonably foreseeable significant effects. If the action cannot be modified, DoW may still CATEX the action if, even with an extraordinary circumstance, DoW determines the proposed action does not have the potential to result in significant impacts (DoW 2026).

OR

ii. The agency shall prepare an EA or EIS as appropriate if DoW determine that it cannot apply a CATEX.

DoW 2026 lists the following as extraordinary circumstances that may preclude the use of a CATEX:

1. Potential for substantial adverse effect on public health, safety or the environment;
2. Potential to violate applicable Federal, State, Tribal, or local environmental laws;
3. Greater scope or size of project than usual for the category of action proposed;
4. Project poses uncertain, unknown, or unique risks to public health, safety, or the environment that are unlike those posed by typical actions in the excluded category;
5. Project will result in an uncontrolled or unpermitted release of hazardous substances or require a conformity determination under standards in 40 CFR part 93, subpart B (the Clean Air Act General Conformity Rule);
6. Potential for substantial adverse effect on the following sensitive resources, unless the potential impact has been resolved through another environmental process (e.g., Coastal Zone Management Act, NHPA, Clean Water Act, etc.):
    a. Endangered or threatened species listed under the Endangered Species Act, or designated critical habitat for these species; and/or
    b. Areas of particular environmental concern or sensitivity such as coral reefs, federally designated wilderness areas, wildlife refuges, marine sanctuaries and monuments, wetlands, sole source aquifers, or parklands; and/or
    c. Have an adverse effect on archaeological resources or historic properties listed or determined to be eligible for listing in the National Register of Historic Places.

5 AIR QUALITY EXTRAORDINARY CIRCUMSTANCES

Section 102 of NEPA applies "to proposals for legislation and other major Federal actions significantly affecting the quality of the human environment..." In evaluating the applicability of a CATEX, an extraordinary circumstance is a condition or situation which makes a normally

CATEXable action have a potentially significant effect on the human environment. For air quality impact assessments, a significant effect is defined by the degree to which the effects of a proposed action potentially could affect public health or safety. The EPA developed Primary National Ambient Air Quality Standards (NAAQSs) to provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Specifically, the EPA set Primary NAAQSs for six principal pollutants (known as criteria pollutants): carbon monoxide (CO), oxides of nitrogen (NOx) monitored as nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), sulfur oxides (SOx) monitored as sulfur dioxide (SO_2), and lead (Pb).

Two criteria pollutants, O_3 and PM, have precursors or chemical compounds that lead to the formation of the pollutant. Awareness of these precursors are critical because General Conformity evaluates both criteria pollutants and their precursors. O_3 is not emitted directly into the air, instead it is created via a photochemical reaction of volatile organic compounds (VOCs) and NOx. PM on the other hand is created either directly or indirectly through SO_2, VOCs, NOx, and ammonia (NH_3) under specific environmental conditions.

As a result, air quality impact significance is defined by an action's potential to cause or contribute to a new violation of one or more of these NAAQSs. General Conformity (40 CFR 93.153) defines an action as having an insignificant impact on air quality when the Federal action's net emissions (sum of direct and indirect emissions increases and decreases caused by the Federal action) of the criteria pollutant or precursor are below the de minimis levels in 40 CFR 93.153(b)(1) and 40 CFR 93.153(b)(2). In other words:

- Insignificant Effect = Action does not cause or contribute to exceeding one or more NAAQSs

- Potentially Significant Effect = Action has the potential to cause or contribute to exceeding one or more NAAQSs

An extraordinary circumstance for air quality occurs when a proposed action may interfere with a SIP or cause or contribute to exceeding one or more NAAQSs. This is considered a significant effect on air quality.

Extraordinary Circumstance = Potential Significant Effect

Ambient air quality is monitored by the EPA in terms of criteria pollutant concentrations and their temporal and spatial distribution. Based on the monitoring data for these criteria pollutants, the local area's ambient air quality is classified in the context with meeting the NAAQSs as attainment **(which, for this document, includes areas that are unclassified)**, nonattainment, or maintenance areas (this designation is considered the attainment status or the area the proposed action will occur within). These area classifications define the baseline context of a localized area:

- **Attainment/Unclassified:** Localized areas where the ambient air quality meets all NAAQSs are classified as attainment areas.

- **Nonattainment:** Localized areas where the ambient air quality does not meet one or more NAAQSs are classified as nonattainment areas. Nonattainment areas are further classified based on their severity or the degree of exceeding a NAAQS.

- **Maintenance:** Localized areas that have recently achieved attainment for one or more NAAQS and have an approved maintenance plan are classified as maintenance areas. These areas are subject to their maintenance plan for at least twenty years (two consecutive ten-year plans).

Therefore, for AQIA, **air quality impact is evaluated in the context of the local area's current ambient air quality as defined by the area's attainment status**:

- **Attainment/Unclassified** (in attainment with all NAAQS).

- **Nonattainment, including severity** (does not meet one or more NAAQSs).

- **Maintenance** (recently met NAAQSs; therefore, monitored and treated as nonattainment).

Note, while according to DoW 2026 you are technically allowed to apply more than one CATEX to an action if there are no extraordinary circumstances or if the action will not result in reasonably foreseeable significant effects, applying two or more CATEXs involving air emissions is always a potential extraordinary circumstance for air quality that must be evaluated. In these cases, it is necessary to evaluate the net emissions through a *Level II, Quantitative Assessment*, for the air quality impacts of the entire action.

5.1 GENERAL CONFORMITY RULE

The General Conformity Rule (40 CFR 93 Subpart B) was established under Clean Air Act Section 176(c)(4), to help states and tribes improve air quality in those areas that do not meet the NAAQS. The rule requires a special air quality impact assessment (Conformity evaluation) to demonstrate that Federal action within nonattainment or maintenance areas will conform (not interfere) with a state's implementation plan (SIP) to attain and maintain NAAQSs. **Unlike a NEPA assessment, actions that will not conform (will interfere) with a SIP cannot proceed.**

General Conformity analyses are developed in parallel with NEPA documents but are separate and distinct requirements and should be either documented separately or addressed independently in a single document. Generally, the DAF conducts NEPA and General Conformity assessments merged into one analysis within the AQIA process (AQIA 2026).

5.2 GENERAL CONFORMITY POTENTIALLY AN EXTRAORDINARY CIRCUMSTANCE

According to DoW 2026, CATEXs are defined as categories of actions that do not individually or cumulatively have potential for significant effect on the environment. However, the application of a CATEX to an action does not eliminate the need to meet the General Conformity requirements. Therefore, even if an action is on the CATEX list, it still needs to be evaluated for General Conformity if it is in a nonattainment or maintenance area. General Conformity applicability is itself an extraordinary circumstance.

Because nonattainment or maintenance areas are locations where the EPA has determined there is an adverse impact to air quality and human health, General Conformity requirements can be an "extraordinary circumstance". Therefore, a positive (conforming, demonstrated insignificant impact) General Conformity assessment must be documented before a CATEX can be taken. An action requiring a General Conformity determination cannot be CATEXed.

5.3 AIR QUALITY INSIGNIFICANCE CRITERIA

Under the General Conformity Rule, the EPA has established a list of PTC (Presumed to Conform) actions that the EPA has determined were de minimis so they will not cause or contribute to any new violation of one or more NAAQSs. These PTC actions are based on EPA established Insignificance Criteria, which the EPA determined to be insignificant (too trivial or minor to cause or contribute to exceeding one or more NAAQSs). Therefore, PTC actions do not merit consideration of adverse impacts to health or safety. As such, any proposed action that is or is closely similar to one of the PTC actions is considered too trivial to pose a significant impact to air quality and will not adversely impact health or safety.

PTC Action = No Extraordinary Circumstance = No Potential Significant Effect

Not PTC Action = Potential Extraordinary Circumstance = Potential Significant Effect

The General Conformity Rule's PTC list provides two general types of Insignificance Criteria: Predetermined PTC and Demonstrated De Minimis. The Predetermined PTC actions list is already established and can be automatically taken and include actions that are: Clearly De Minimis, not reasonably foreseeable, conforming program, EPA Specified as Exempted, and EPA Presumed to Conform. The Demonstrated De Minimis action exemption requires a quantitative net change inventory analysis to demonstrate the annual net change in emissions are below the de minimis values based on the severity of the nonattainment area. Note that the General Conformity Rule also allows Federal agencies to develop Agency-Specific PTC actions list per 40 CFR 93.153(f). All Agency-Specific PTC actions must meet specific criteria set and be approved by the EPA. However, DAF currently has no Agency-Specific PTC actions approved, specified as PTC by the EPA.

The PTC list is used in this evaluation in Step 2 Predetermined PTC Action Check. CATEXs which are the same or **closely similar** to one of the exempt actions on the Predetermined PTC Action List were considered PTC, insignificant, and no further evaluation was required.

5.3.1 Predetermined PTC List

As discussed above, the first insignificance criteria is the list of EPA established PTC actions (Predetermined PTC List). Predetermined PTC List is a complied list of actions the EPA has already determined are too trivial to pose a significant impact to air quality and will not adversely impact health or safety. Therefore, the Predetermined PTC List is a group of actions that are predetermined to be insignificant and are listed in 40 CFR 93.153. The Predetermined PTC List includes actions that: are clearly de minimis, the emissions are not reasonably foreseeable, are conducting or carrying out a conforming program, the EPA has specifically exempted, are part of a continuing response to an emergency or disaster, and the EPA has specifically determined they are PTC.

5.3.1.1 Clearly De Minimis: PTC Actions

This includes actions that the EPA has determined are "actions which would result in no emissions increase or an increase in emissions that is clearly de minimis". The EPA has defined these broad categories of exempt actions under 40 CFR 93.153(c)(2) that result in no emissions increase or increases in emissions that are clearly de minimis. These actions are not subject to further analysis for applicability or conformity under the General Conformity Rule.

Table 5-1, Clearly De Minimis PTC Actions

Citation	General Conformity Exemption
40 CFR 93.153 (c)(2)(i)	Judicial and legislative proceedings.
40 CFR 93.153 (c)(2)(ii)	Continuing and recurring activities such as permit renewals where activities conducted will be similar in scope and operation to activities currently being conducted.
40 CFR 93.153 (c)(2)(iii)	Rulemaking and policy development and issuance.
40 CFR 93.153 (c)(2)(iv)	**Routine maintenance and repair activities**, including repair and maintenance of administrative sites, roads, trails, and facilities.
40 CFR 93.153 (c)(2)(v)	Civil and criminal enforcement activities, such as investigations, audits, inspections, examinations, prosecutions, and the training of law enforcement personnel
40 CFR 93.153 (c)(2)(vi)	Administrative actions such as personnel actions, organizational changes, debt management or collection, cash management, internal agency audits, program budget proposals, and matters relating to the administration and collection of taxes, duties and fees.
40 CFR 93.153 (c)(2)(vii)	The **routine, recurring transportation of material and personne**l.
40 CFR 93.153 (c)(2)(viii)	**Routine movement of mobile assets**, such as ships and aircraft, in home port reassignments and stations (when no new support facilities or personnel are required) to perform as operational groups and/or for repair or overhaul.

Table 5-1, Clearly De Minimis PTC Actions (cont.)

Citation	General Conformity Exemption
40 CFR 93.153 (c)(2)(ix)	**Maintenance dredging and debris disposal** where no new depths are required, applicable permits are secured, and disposal will be at an approved disposal site.
40 CFR 93.153 (c)(2)(x)	Actions, such as the following, with respect to existing structures, properties, facilities and lands where **future activities conducted will be similar in scope and operation to activities currently being conducted** at the existing structures, properties, facilities, and lands; for example, relocation of personnel, disposition of federally-owned existing structures, properties, facilities, and lands, rent subsidies, operation and maintenance cost subsidies, the exercise of receivership or conservatorship authority, assistance in purchasing structures, and the production of coins and currency.
40 CFR 93.153 (c)(2)(xi)	The granting of leases, licenses such as for exports and trade, permits, and easements where activities conducted will be similar in scope and operation to activities currently being conducted.
40 CFR 93.153 (c)(2)(xii)	Planning, studies, and provision of technical assistance.
40 CFR 93.153 (c)(2)(xiii)	**Routine operation of facilities, mobile assets and equipment**.
40 CFR 93.153 (c)(2)(xiv)	Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer.
40 CFR 93.153 (c)(2)(xv)	The designation of empowerment zones, enterprise communities, or viticultural areas.
40 CFR 93.153 (c)(2)(xvi)	Actions by any of the Federal banking agencies or the Federal Reserve Banks, including actions regarding charters, applications, notices, licenses, the supervision or examination of depository institutions or depository institution holding companies, access to the discount window, or the provision of financial services to banking organizations or to any department, agency or instrumentality of the United States.
40 CFR 93.153 (c)(2)(xvii)	Actions by the Board of Governors of the Federal Reserve System or any Federal Reserve Bank necessary to effect monetary or exchange rate policy.
40 CFR 93.153 (c)(2)(xviii)	Actions that implement a foreign affairs function of the United States.

Table 5-1, Clearly De Minimis PTC Actions (cont.)

Citation	General Conformity Exemption
40 CFR 93.153 (c)(2)(xix)	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.
40 CFR 93.153 (c)(2)(xx)	Transfers of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity and assignments of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity for subsequent deeding to eligible applicants
40 CFR 93.153 (c)(2)(xxi)	Actions by the Department of the Treasury to effect fiscal policy and to exercise the borrowing authority of the United States.
40 CFR 93.153 (c)(2)(xxii)	**Air traffic control activities and adopting approach, departure, and enroute procedures for aircraft operations above the mixing height** specified in the applicable SIP or TIP. Where the applicable SIP or TIP does not specify a mixing height, the Federal agency can use the 3,000 feet above ground level as a default mixing height, unless the agency demonstrates that use of a different mixing height is appropriate because the change in emissions at and above that height caused by the Federal action is de minimis.

5.3.1.2 Not Reasonably Foreseeable PTC Actions

This includes actions that the EPA has determined that "the emissions are not reasonably foreseeable." The EPA exempted actions where the emissions are not reasonably foreseeable (i.e., location of emissions are unknown, and the emissions are not quantifiable). Under NEPA, "reasonably foreseeable means sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision." Additionally, under the General Conformity Rule, reasonably foreseeable emissions are projected future direct and indirect emissions that are identified at the time the conformity determination is made; the location of such emissions is known and the emissions are quantifiable as described and documented by the Federal agency based on its own information and after reviewing any information presented to the Federal agency.

Table 5-2, Not Reasonably Foreseeable PTC Actions

Citation	General Conformity Exemption
40 CFR 93.153 (c)(3)(i)	Initial Outer Continental Shelf lease sales which are made on a broad scale and are followed by exploration and development plans on a project level.
40 CFR 93.153 (c)(3)(ii)	**Electric power marketing activities** that involve the acquisition, sale and transmission of electric energy.

5.3.1.3 Conforming Program PTC Actions

This includes actions that the EPA has determined "implement a decision to conduct or carry out a conforming program such as prescribed burning actions which are consistent with a conforming land management plan." The EPA exempted actions which implement a decision to conduct or carry out a conforming program.

Table 5-3, Conforming Program PTC Actions

Citation	General Conformity Exemption
40 CFR 93.153 (c)(4)	Actions which implement a decision to **conduct or carry out a conforming program** such as **prescribed burning** actions which are consistent with a conforming land management plan.

5.3.1.4 EPA Specified as Exempted PTC Actions

This includes actions that the EPA has determined are exempted actions specifically exempted due to the nature of the actions. Exempt activity means an activity that has been predetermined to be exempted from General Conformity requirements because the action: results in no emissions increase or an increase in emissions that is clearly de minimis; emissions are not reasonably foreseeable (i.e., location of emissions are unknown, and the emissions are not quantifiable); is for permitted sources; is a response to emergencies; is research, investigations, studies, demonstrations, or training activities; is specifically required by new or existing applicable environmental legislation or environmental regulations; or remedial and removal actions carried out under the CERCLA and associated regulations.

Table 5-4, EPA Specified PTC Actions

Citation	General Conformity Exemption
40 CFR 93.153 (d)(1)	The portion of an action that includes **major or minor new or modified stationary sources that require a permit under the new source review (NSR) program** (Section 110(a)(2)(c) and Section 173 of the Act) **or the prevention of significant deterioration program** (Title I, Part C of the Act).
40 CFR 93.153 (d)(2)	**Actions in response to emergencies** which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e).
40 CFR 93.153 (d)(3)	**Research, investigations, studies, demonstrations, or training** (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP.
40 CFR 93.153 (d)(4)	**Alteration and additions of existing structures as specifically required by new or existing applicable environmental legislation or environmental regulations** (e.g., hush houses for aircraft engines and scrubbers for air emissions).
40 CFR 93.153 (d)(5)	**Direct emissions from remedial and removal actions carried out under the CERCLA and associated regulations** to the extent such emissions either comply with the substantive requirements of the PSD/NSR permitting program or are exempted from other environmental regulation under the provisions of CERCLA and applicable regulations issued under CERCLA.

5.3.1.5 Emergency or Disaster Response PTC Actions

This includes actions that the EPA has determined are exempted actions because they are part of a continuing response to an emergency or disaster." Emergency means a situation where extremely quick action on the part of the Federal agencies involved is needed and where the timing of such Federal activities makes it impractical to meet the requirements of this subpart, such as natural disasters like hurricanes or earthquakes, civil disturbances such as terrorist acts and military mobilizations.

Table 5-5, EPA Disaster Response PTC Actions

Citation	General Conformity Exemption
40 CFR 93.153 (e)	Federal actions which are part of a continuing response to an emergency or disaster under paragraph (d)(2) of this section, and which are to be taken more than 6 months after the commencement of the response to the emergency or disaster under paragraph (d)(2) of this section are exempt from the requirements of this subpart.

5.3.1.6 EPA Presumed to Conform Action

The EPA exempted actions which that the EPA determined would not cause or contribute to any new violation of one or more NAAQSs; therefore, they are EPA specified PTC actions. PTC activity means an activity that has been predetermined to conform with any applicable implementation plan for the criteria pollutants or their precursors. DAF does not have any agency-specific PTC actions approved under 40 CFR 93.153(f); therefore, only EPA-specified PTC actions may be applied.

Table 5-6, EPA Presumed to Conform Exempt Actions

Citation	General Conformity Exemption
40 CFR 93.153 (i)(1)	Actions at installations with facility-wide emission budgets meeting the requirements in 40 CFR 93.161 provided that the State or Tribe has included the emission budget in the EPA-approved SIP and the emissions from the action along with all other emissions from the installation will not exceed the facility-wide emission budget.
40 CFR 93.153 (i)(2)	Prescribed fires conducted in accordance with a smoke management program (SMP) which meets the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA policy.
40 CFR 93.153 (i)(3)	Emissions for actions that the State or Tribe identifies in the EPA-approved SIP or TIP as "presumed to conform."

5.3.2 Demonstrated De Minimis PTC Actions

Unlike the Predetermined PTC Action List, where you pick from an EPA established a list of exempt/PTC actions, the Demonstrated De Minimis PTC Action criteria requires a quantitative net change inventory analysis demonstrates the annual change in emissions are below the de minimis PTC values. The de minimis values are PTC emission rates (in tons per year ton/yr or tpy) that the EPA has determined are PTC because they are considered insignificant (too trivial or minor) to cause or contribute to exceeding one or more NAAQSs and therefore they do not merit consideration of adverse impacts to health or safety. Under NEPA, emissions below de minimis thresholds do not constitute a reasonably foreseeable significant effect on air quality.

The General Conformity Rule established "de minimis" (trivial or minor) emissions levels for each of the NAAQS pollutant. These EPA established "de minimis" emissions levels are considered by the EPA to be too insignificant to cause or contribute to exceeding one or more NAAQSs and therefore they do not merit consideration of adverse impacts to health or safety. Actions with annual net emissions below the de minimis thresholds are considered insignificant and do not require a conformity determination.

As discussed above, General Conformity only applies to actions that will occur within areas designated by the EPA as nonattainment or maintenance. A nonattainment area is an area that exceeds NAAQS pollution limits for one or more criteria pollutant, and a maintenance area is an area previously designated nonattainment and subsequently subject to a maintenance plan. Consequently, nonattainment or maintenance areas are locations where the EPA has determined there is an adverse impact to air quality and human health. Therefore, actions the EPA has determined to be insignificant for nonattainment or maintenance areas would also clearly also be insignificant for attainment areas.

5.3.2.1 Insignificance Indicators

The DAF has established Insignificance Indicators (thresholds) based on the EPA's General Conformity Rule (40 CFR 93 Subpart B) established "de minimis" (trivial or minor) emissions levels for each of the NAAQS pollutant. These EPA established "de minimis" emissions levels (in ton/yr) are considered insignificant (too trivial or minor) to cause or contribute to exceeding one or more NAAQSs and therefore do not merit consideration of adverse impacts to health or safety.

Following the same principles as used in the EPA's General Conformity Rule "de minimis" emissions levels, DAF also established Insignificance Indicators for both attainment areas and greenhouse gasses (GHGs). See *Level II, Air Quality Quantitative Assessment, Insignificance Indicator*s (AFCEC 2023) for details.

These Insignificance Indicator values are considered insignificant (too trivial or minor) to merit consideration of adverse impacts to health or safety.

Extraordinary Circumstance = Potential Significant Effect

Extraordinary Circumstance = Potentially causes or contribute to exceeding NAAQSs

As discussed previously, air quality impact is evaluated in the context of the local area's current ambient air quality as defined by the area's attainment status. There are three attainment status levels:

- **Attainment/Unclassified:** The local area is in attainment with all NAAQS or presumed attainment areas where there was insufficient data collected to make a formal attainment determination.

- **Nonattainment (including the severity of nonattainment):** The local area does not meet one or more NAAQSs.

- **Maintenance:** The local area recently met NAAQSs; therefore, are treated the same as nonattainment.

Therefore, for any given pollutant of concern, the Insignificance Indicator value is dependent on the context of the local area's current ambient air quality as defined by the attainment status of the local area the proposed action will occur within. Additionally, for areas in nonattainment for one or more NAAQSs, the context of the local area's current attainment status also involves the severity (level above a NAAQS) of the nonattainment. DAF has established Insignificance Indicator values for all pollutants of concern (POCs) for air quality (See *Table 5-7, DAF Air Quality POC Insignificance Indicators*).

5.3.2.2 Insignificance Indicators as Qualifiers of Potential Extraordinary Circumstance

Insignificance Indicator exemptions and values definitively identify actions that do not cause or contribute to exceeding one or more NAAQSs which in turn definitively identify actions that do not cause or contribute to adverse impacts to health or safety. Therefore, inversely, exceeding POC Insignificance Indicator values can identify actions that potentially cause or contribute to exceeding one or more NAAQSs which in turn identifies actions that cause or contribute to adverse impacts to health or safety.

Table 5-7, DAF Air Quality POC Insignificance Indicators

Regulated Pollutant	Pollutant of Concern	Area Classification (Attainment Status)		Indicator * (ton/yr)
O_3	O_3 precursors (VOC or NOx)	Nonattainment	Extreme	10
			Severe-17 or Severe-15	25
			Serious	50
			Moderate or Marginal Outside ozone transport zone	100
			Moderate or Marginal Inside ozone transport zone	50 for VOC & 100 for NOx
		Maintenance	Outside ozone transport zone	100
			Inside ozone transport zone	50 for VOC & 100 for NOx
		Attainment		250
CO, SO_2, or NOx	CO, SO_2, or NO_2	Nonattainment		100
		Maintenance		100
		Attainment		250
PM10	PM10	Nonattainment	Serious	70
			Moderate	100
		Maintenance		100
		Attainment		250
PM2.5	PM2.5 and potentially its precursors (SO_2, NOx, VOC, NH_3)	Nonattainment	Serious	70
			Moderate	100
		Maintenance		100
		Attainment		250
Pb	Pb	Nonattainment		25
		Maintenance		25
		Attainment		25
GHG	CO_2e	All Locations		75,000

Note:
O_3 = ozone, VOC = volatile organic compounds, CO = carbon monoxide, SO_2 = sulfur dioxide, NO_x = nitrogen oxides, NO_2 = nitrogen dioxide, PM10 = particulate matter $\leq$ 10 micrometers, PM2.5 = particulate matter $\leq$ 2.5 micrometers, NH_3 = ammonia, Pb = lead, GHG = greenhouse gas, and CO_2e = CO_2 equivalent
* Indicator for nonattainment and maintenance areas are actual General Conformity threshold value.

POC Insignificance Indicator values cannot definitively identify an extraordinary circumstance for air quality; however, they do indicate when a proposed action clearly does not have an extraordinary circumstance. Inversely, POC Insignificance Indicator values can also identify when a proposed action potentially has an extraordinary circumstance.

Not Extraordinary Circumstance = Below Insignificance Indicator = Will not exceed NAAQSs

Potential Extraordinary Circumstance = Exceed Insignificance Indicator = Potentially will causes or contribute to exceeding NAAQSs

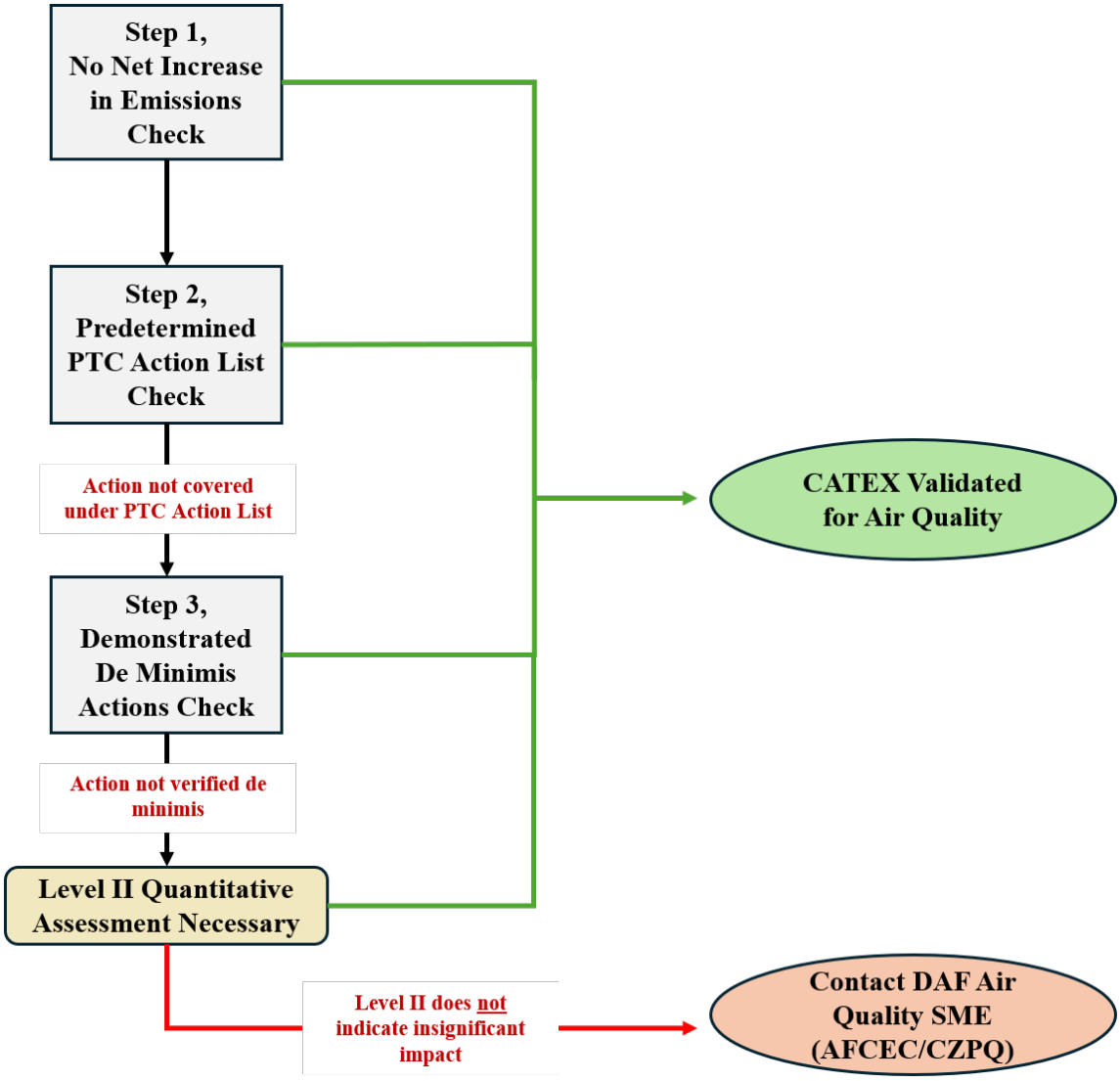
6 EVALUATION ASSESSMENT METHODOLOGY

The evaluation of each DAF and DA-established CATEX will consist of an extraordinary circumstances assessment. Potential extraordinary circumstances were evaluated in three progressive steps: Step 1, No Net Increase in Emissions Check; Step 2, Predetermined PTC Action List Check; and if needed, Step 3, Demonstrated De Minimis PTC Action Assessment. *Figure 6-1, Evaluation Assessment Methodology Flow Chart* below illustrates the decision-making process and the evaluation assessment methodology in a simplified diagram. Note, though the CATEX may be validated for air quality, the CATEX may only be taken if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Many of the DoW CATEXs include activities that are routine for the present mission and reoccurring in nature. As air quality is concerned with the net emissions (sum of direct and indirect emissions increases and decreases caused by the Federal action), a Federal action which continues with existing routine and/or reoccurring activities will **not** result in a net increase of emissions and will **not** significantly affect air quality under NEPA (not a potential extraordinary circumstance for air quality).

Additionally, CATEXs which are routine or purely administrative will have no net change on the environment; therefore, for air quality, they also result in no new significant impact on the environment. CATEXs for such categories of actions are therefore unnecessary as they do not cause a new significant impact to the environment and are part of the current mission. However, these routine and administrative CATEXs have been retained in Appendix A of DoW 2026 for ease of reference and to provide clear examples of actions that normally do not significantly affect the quality of the human environment.

Figure 6-1, Evaluation Assessment Methodology Flow Chart



6.1 STEP 1, NO NET INCREASE IN EMISSIONS CHECK

Actions that result in no net increase in emission increases are generally actions that are "solely administrative" and/or "routine".

- "Solely Administrative Actions" are activities relating to the management of DAF (such as maintaining information files and processing paperwork) and does not involve any direct or indirect emission sources. Given there are no emissions sources involved, there cannot be any net change in emissions. Therefore, "solely administrative actions" will not have an effect to air quality under NEPA and are automatically considered not an extraordinary circumstance for air quality.

- "Routine Actions" are activities relating to the normal and frequent conduct of the DAF (or suborganization) mission. Because they are the regular (usual) course of procedure (i.e., activity) for organization's established mission, they do not involve any NEW direct or indirect emission sources. Given there are no new emissions sources involved, there cannot be any net change in emissions. Therefore, "routine actions" will not have an effect to air quality under NEPA and are automatically considered not an extraordinary circumstance for air quality. Note that while special and community relations events (e.g., open houses, town halls, air shows, athletic events, Earth Day) are routine DAF activities, they are infrequent and may involve new (additional) emission sources; therefore, they are NOT routine actions (normal and frequent mission conduct).

Each of the existing DAF and DA-established CATEXs were reviewed to identify any potential reasonably foreseeable direct and indirect emission sources of POCs [criteria pollutant (or their precursor) and GHG (CO_2, CH_4, N_2O, and CO_2e only)]:

- **Reasonably foreseeable**:
  - Under NEPA, "reasonably foreseeable means sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision."
  - Under the General Conformity Rule, reasonably foreseeable emissions are projected future direct and indirect emissions that are identified at the time the conformity determination is made; the location of such emissions is known and the emissions are quantifiable as described and documented by the Federal agency based on its own information and after reviewing any information presented to the Federal agency.

- **Direct emissions** are air emissions that are caused or initiated by the CATEX action and occur at the same time and place as the action.

- **Indirect emissions** are air emissions that are caused or initiated by the CATEX action and occur at a different time or place as the action.

Existing DAF and DA-established CATEXs with **NO or NO NET INCREASE** in reasonably foreseeable direct and indirect emission sources are **clearly de minimis, were considered verified** insignificant (no extraordinary circumstances), and were not evaluated further.

6.2 STEP 2, PREDETERMINED PTC ACTION LIST CHECK

Each of the remaining DAF and DA-established CATEXs after Step 1 were further evaluated by comparing the CATEXs against the Predetermined PTC Action List. If a DA or DAF-established CATEX is the same or is **closely similar** to one of the exempt actions on the Predetermined PTC Action List, the CATEX was considered PTC, insignificant, and no further evaluation was required.

6.3 STEP 3, DEMONSTRATED DE MINIMIS ACTIONS CHECK

Each of the remaining DAF and DA-established CATEXs after Step 2 were further evaluated by performing an AQIA *Level II, Quantitative Assessment*. A Level II assessment is a quantitative estimate of the annual net change in total direct and indirect emissions of POCs. ACAM or the *Simulated Air Impact Review* (sAIR) must be used throughout the DAF to perform this emissions estimate. ACAM and sAIR provide simplified emission modeling that is adequate for a General Conformity Applicability Assessment and an initial NEPA Assessment for air quality.

The ACAM assessment for each of the CATEXs were performed as follows:

- All input parameters started as the worst-case scenario (i.e., results in the highest net change in emissions). Worst-case refers to maximum reasonably foreseeable emissions based on equipment capacity, operational tempo, and fuel use.

- If a CATEX was written so vaguely that in certain situations the action described by that CATEX cannot be evaluated by ACAM or it appears the action could have a significant negative impact on air quality, assumptions to the input parameters were made to attempt to bring all of the POC emission rates below all of the DAF Insignificance Indicators for each severity level of nonattainment status.

- All assumptions used within the ACAM assessment were clearly stated within the ACAM Reports.

- If the findings of a DAF-established CATEX's ACAM assessment indicated:
    - No significant impact to air quality, **the CATEX is *fully verified*,** and findings were documented through the ACAM automated reports.
    - A potential significant impact to air quality:
        - ACAM input parameters were adjusted to attempt to bring all of the POC emission rates below all of the DAF Insignificance Indicators for each severity level of nonattainment status.
        - If adjustment of ACAM input parameters:
            - Brought all POC emission rates below DAF Insignificance Indicators, **the CATEX is conditionally verified,** and the acceptable maximum conditions were documented as constraints to using the CATEX.
            - Failed to bring all the POC emission rates below DAF Insignificance Indicators, **the CATEX *cannot be verified*,** and a de minimis ACAM assessment must be documented in order to use the CATEX.

If a CATEX was written so vaguely that its air quality impacts in certain situations cannot be evaluated in ACAM or sAIR, additional guidance was provided on the appropriate use of the CATEX.

7 DAF CATEX EVALUATION ASSESSMENT

7.1 DoW A83-1

"Routine procurement of goods and services."

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions and action has an insignificant impact to air quality. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.2 DoW A84-2

"Routine Commissary and Exchange operations."

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions and action has an insignificant impact to air quality. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.3 DoW A85-3

"Routine recreational and welfare activities."

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions and action has an insignificant impact to air quality. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.4 DoW A86-4

"Normal personnel, fiscal or budgeting, and administrative activities and decisions including those involving military and civilian personnel (for example, recruiting, processing, paying, and records keeping)."

Step 2, Predetermined PTC Evaluation:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions and action has an insignificant impact on air quality. Note also equivalent to EPA Predetermined PTC Action 40 CFR 93.153(c)(2)(vi): "Administrative actions such as personnel actions, organizational changes, debt management or collection, cash management, internal agency audits, program budget proposals, and matters relating to the administration and collection of taxes, duties and fees." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(vi) both applies."

7.5 DoW A87-5

"Preparing, revising, or adopting regulations, instructions, directives, or guidance documents that do not, themselves, result in an action being taken."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA Predetermined PTC Action 40 CFR 93.153 (c)(2)(iii): "Rulemaking and policy development and issuance." Step 1, No Net Increase Evaluation is also applicable. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine rulemaking and policy activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iii) applies."

7.6 DoW A88-6

"Preparing, revising, or adopting regulations, instructions, directives, or guidance documents that implement (without substantial change) the regulations, instructions, directives, or guidance documents from higher headquarters or other Federal agencies with superior subject matter jurisdiction."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA Predetermined PTC Action 40 CFR 93.153 (c)(2)(iii): "Rulemaking and policy development and issuance." Step 1, No Net Increase Evaluation is also applicable. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine rulemaking and policy activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iii) applies."

7.7 DoW A89-7

"Continuation or resumption of pre-existing actions, where there is no substantial change in existing conditions or existing land uses and where the actions were originally evaluated in accordance with applicable law and regulations, and surrounding circumstances have not changed."

Step 1, No Net Increase Evaluation:
Continuation or resumption of pre-existing actions; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Pre-existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.8 DoW A90-8

"Performing interior and exterior construction within the 5-foot line of a building without changing the land use of the existing building."

Step 3, De Minimis Action Check:

Unfortunately, construction activities can potentially produce a level of air emissions that could be a health hazard. To verify this as a de minimis action, a de minimis activity evaluation was performed for a worst-case construction activity within the 5-foot line of a preexisting building on all four sides of the building (see *Attachment A: Worst-Case 5ft Line Construction ACAM Analysis*). To evaluate this CATEX for the worst-case scenario, the size of the preexisting building was assumed to be 6,500,000 ft^2 (approximately the area of the office space in the Pentagon) (Roulo, 2024). In this scenario, it was also assumed that the 6,500,000 ft^2 building was extended five feet on all sides.

The following general assumptions were made:

- Area of existing building assumed to be 6,500,000 ft^2
  - 6,500,000 ft^2 taken from the pentagon having 6,500,000 ft^2 of office space
- A building length to width ratio (L:W) of 2:1 for optimal vehicle travel distance and was assumed to apply to the building in the analysis
- Assumed building was extended five ft on all four sides
- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
- Assumed a DAF average building height of 10 ft
- One-year total construction project duration chosen as worst-case scenario
- Assumed construction occurred in the most severe nonattainment area for each pollutant
- Project involves all five construction phases (demolition, site grading, trenching, building construction, architectural coating, and paving)

Table 7-1, Worst-Case 5ft Line Construction POC Emissions

Annual POC Emissions (ton/year)					
VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
0.618	1.197	1.577	0.003	1.288	0.040

Based on *Table 7-1, Worst-Case 5ft Line Construction POC Emissions*, construction activity within the 5-foot line of a preexisting building would result in emissions below the de minimis thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, demonstrating the action would pose an insignificant impact on air quality anywhere in the U.S regardless of attainment status. Therefore, construction activity within the 5-foot line is not an extraordinary circumstance for air quality. Additionally, this analysis can serve as a de minimis evaluation for CATEXs involving minor modernization, maintenance, and sustainment actions.

Required Documentation:

- Air quality is not an extraordinary circumstance for construction projects occurring within the 5-foot line of a building. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).
    - Documentation is still required. "Construction within the 5-foot line of a building (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

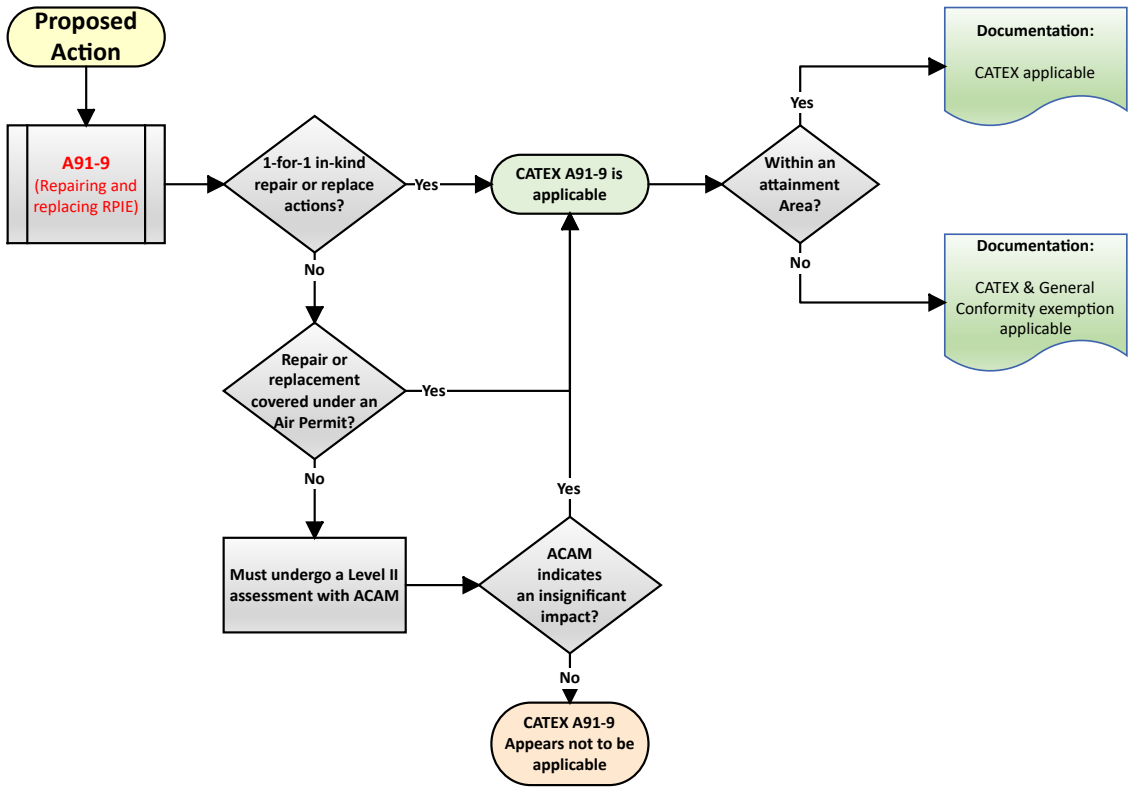
7.9 DoW A91-9

"Repairing and replacing real property installed equipment."

De Minimis Action Check:
Assuming that the Real Property Installed Equipment (RPIE) will emit air emissions, this CATEX (from an air quality perspective) only directly applies to one-for-one in-kind (e.g., same size or less, same fuel, etc.) repair and replacement of existing real property equipment that was previously installed. If the repair and replacement is not a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement, there is no unilateral method of knowing for sure that a repair or replacement of equipment will generate the same or less emissions than the original equipment being replaced. As we have previously demonstrated, any increase in emissions above the insignificance indicator signifies that the proposed action has an extraordinary circumstance which prohibits the use of the CATEX.

Therefore, if the repair and replacement is not a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement, it must be evaluated for "extraordinary circumstances". Evaluating an action for "extraordinary circumstances" can be accomplished with a rapid ACAM/sAIR screening assessment. If the ACAM/sAIR shows the action will NOT potentially result in significant short- or long-term impacts, the CATEX (from an air quality point of view) can be applied (a copy of the ACAM/sAIR report should be attached to the DAF Form 813). CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Figure 7-1, CATEX DoW A91-9 Applicability Flowchart



Required Documentation (If Repair Action or One-for-One In-Kind Replacement Action): "Repair or one-for-one in-kind replacement results in no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and the General Conformity exemption under 40 CFR 93.153(c)(2)(iv) applies

Required Documentation (If Not One-for-One In-Kind Replacement Action but With an Air Permit):

- Air quality is not an extraordinary circumstance for not in-kind replacement actions when the equipment will be included in a permit under the new source review (NSR) program (Section 110(a)(2)(c) and Section 173 of the Act) or the prevention of significant deterioration (PSD) program (Title I, Part C of the Act).
    - Because NSR/PSD permitting ensures emissions are controlled and conform to SIP requirements, actions covered under these permits do not constitute an extraordinary circumstance for air quality."
- However, documentation is required, specifically state: "Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) also applies; both apply conditionally on meeting permit requirements."

Required Documentation (If Not In-Kind Replacement Action and Without Air Permit):

- Air quality is not an extraordinary circumstance only if ACAM/sAIR assessment indicates insignificant (de minimis) air impact.
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If the ACAM/sAIR assessment does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed further**.

7.10 DoW A92-10

"Routine facility maintenance and repair that does not involve disturbing significant quantities of hazardous materials such as asbestos and lead-based paint."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA Predetermined PTC Action 40 CFR 93.153(c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine maintenance and repair activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."

7.11 DoW A93-11

"Actions similar to other actions which have been determined to have an insignificant impact in a similar setting as established in an EIS or an EA resulting in a FONSI. The EPF must document application of this CATEX on AF Form 813, specifically identifying the previous Air Force approved environmental document which provides the basis for this determination."

Step 3, De Minimis Action Check:
This CATEX is very broad as written, and caution must be used in interpreting the meanings of "similar to other actions" and "similar setting." For air quality assessments "similar to other actions" means that the action is equal to or less than the scope, activity, and size of the FONSI action and "similar setting" means the same relative location (i.e., within the same contiguous property) and attainment status.

For the General Conformity Rule (i.e., applicable within nonattainment of maintenance areas), the EPA has determined that routine maintenance and repair activities (exemption 40 CFR 93.153 (c)(2)(iv)) and activities similar in scope operation to activities currently be conducted "would result in no emissions increase or an increase in emissions that is clearly de minimis" (exemption 40 CFR 93.153 (c)(2)(x)). Therefore, CATEX DoW A93-11, from an air quality

point of view, can be taken for recurring activities/projects where activities conducted will be similar in scope and operation without further assessment. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

In trying to use this CATEX there are a few special concerns that must be considered prior to applying the CATEX:

1. SRM projects/actions (see *Figure 7-2, CATEX DoW A93-11 Construction Applicability Flowchart*):
All SRM projects/actions meet the description of Verified Predetermined PTC Action 40 CFR 93.153 (c)(2)(iv): "routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." SRM projects, which can be identified with EEIC 521, 522, and 524, are smaller projects and the 40 CFR 93.153(c)(2)(iv) General Conformity exemption applies. Therefore, for SRM projects, air quality is not an extraordinary circumstance and CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

2. Non-SRM projects/actions (see *Figure 7-2, CATEX DoW A93-11 Construction Applicability Flowchart*):
Non-SRM, on the other hand, are generally larger construction projects that are not routine maintenance and repair; therefore, Non-SRM projects/actions ARE NOT to be CATEXed without undergoing a *Level II, Quantitative Assessment*, with ACAM or sAIR. Additionally, the 40 CFR 93.153(c)(2)(iv) General Conformity exemption does not apply. Air quality is not an extraordinary circumstance for Non-SRM projects/actions ONLY if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact. If the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

3. All Non-Construction Projects/Actions (see *Figure 7-3, CATEX DoW A93-11 Non-Construction Applicability Flowchart*):
From an air quality perspective, this CATEX applies to all Non-Construction projects/actions with no net change in emissions. Other Non-Construction projects/actions MUST BE obviously equal to or less than in scope, activity, and size; at the same relative location; and still has the exact same attainment status of the previous FONSI action to use this CATEX. If an action differs in location or has a different attainment status than the FONSI action or the FONSI action's ACAM/sAIR file is not available, the project/action CANNOT use this CATEX without a further air quality assessment (e.g., ACAM) showing an insignificant impact. If the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). Additionally, documentation is required.

4. General Conformity:
For General Conformity (i.e., applicable within nonattainment of maintenance areas), 40 CFR 93.153(c)(1) exempts "actions where the totals of direct and indirect emissions are

below" the conformity de minimis thresholds. Therefore, only a FONSI action that has been previously demonstrated to be below the conformity de minimis thresholds (for direct and indirect emissions) may be exempt from General Conformity if, and only if, the de minimis determination was performed through the ACAM or sAIR tool. Additionally, the exemption only applies to "similar" actions whose scope, activity, and size are equal to or less than the FONSI action.

Figure 7-2, CATEX DoW A93-11 Construction Applicability Flowchart

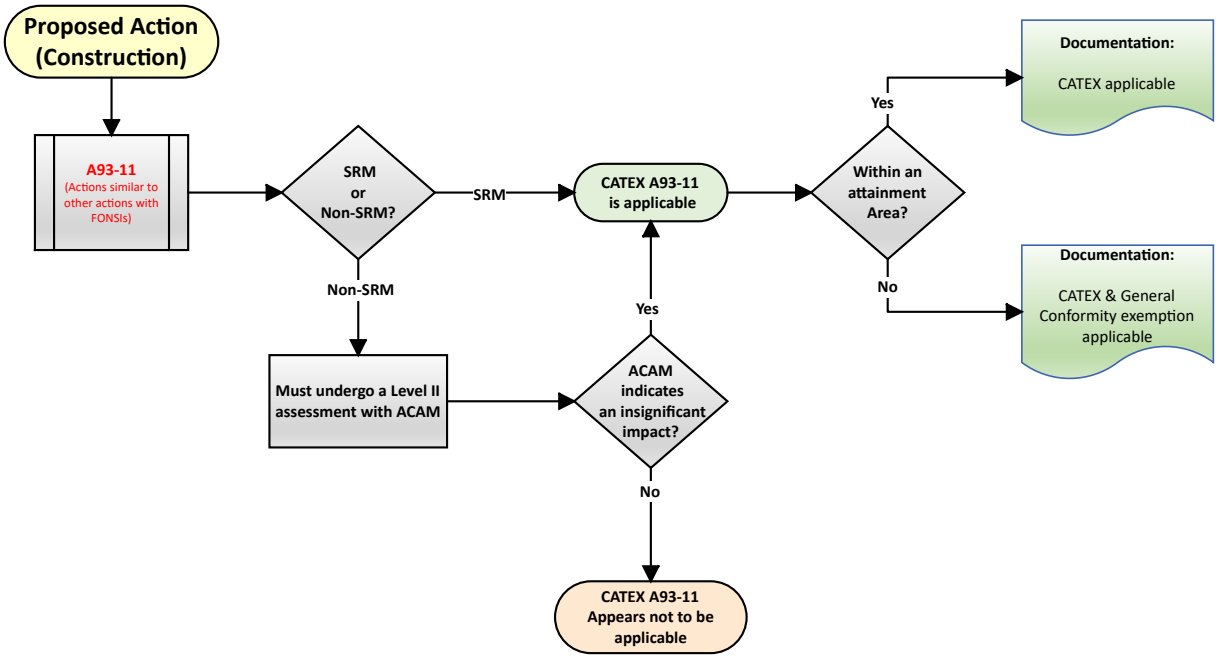
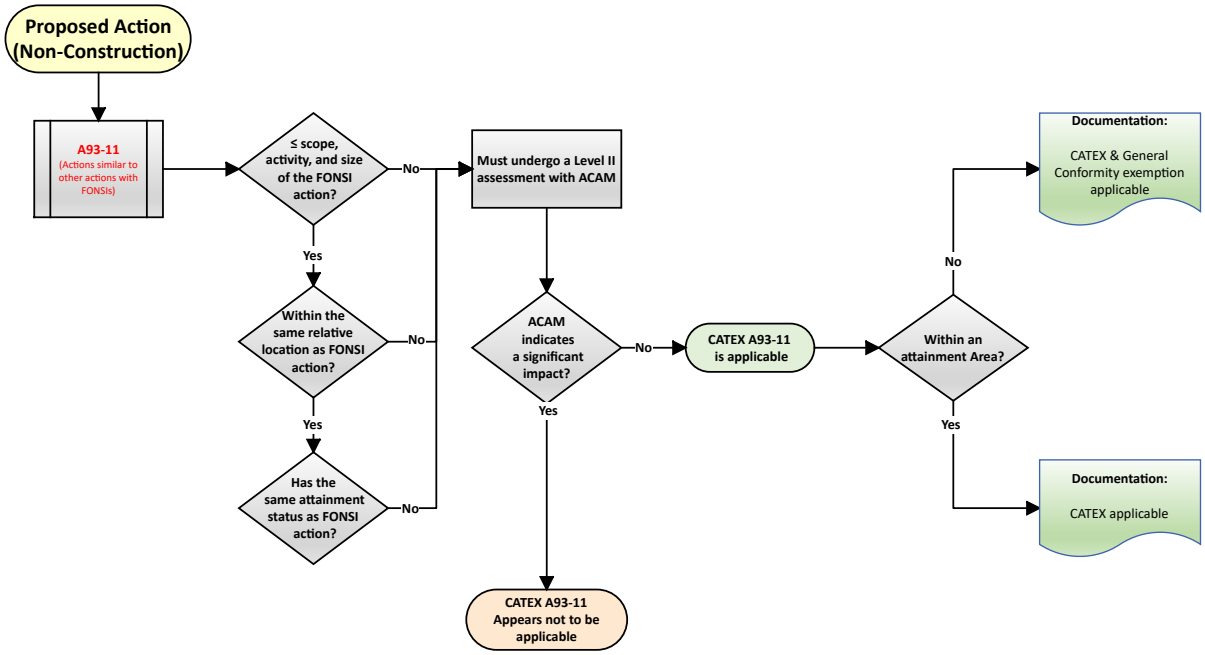


Figure 7-3, CATEX DoW A93-11 Non-Construction Applicability Flowchart



Required Documentation (Non-Construction Projects/Actions):

- If the action is "similar to other actions" and "similar setting," the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). State: "For air quality, the project/action is obviously equal to or less than in scope, activity, and size; at the same relative location; and still has the same attainment status/severity of the previous FONSI. Additionally, the previous FONSI and the associated ACAM/sAIR assessment are readily available for public review. Therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(2)(x) applies."
- If the action is NOT "similar to other actions" and "similar setting," further air quality assessment is required (i.e., ACAM/sAIR assessment).
  - **If the ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
  - **If the ACAM/sAIR assessment does not indicate an insignificant impact**: Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

Required Documentation (If SRM Construction):

"Proposed action is routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Required Documentation (If Non-SRM Construction):

- Non-SRM projects/actions ARE NOT to be CATEXed without undergoing a *Level II, Quantitative Assessment*, with ACAM/sAIR
  - **If the ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
  - **If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact**: Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

7.12 <u>DoW A94-12</u>

"Installing, operating, modifying, and routinely repairing and replacing utility and communications systems, data processing cable, and similar electronic equipment that use existing rights of way, easements, distribution systems, or facilities."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."

7.13 <u>DoW A95-13</u>

"Installing or modifying airfield operational equipment (such as runway visual range equipment, visual glide path systems, and remote transmitter or receiver facilities) on airfield property and usually accessible only to maintenance personnel."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."

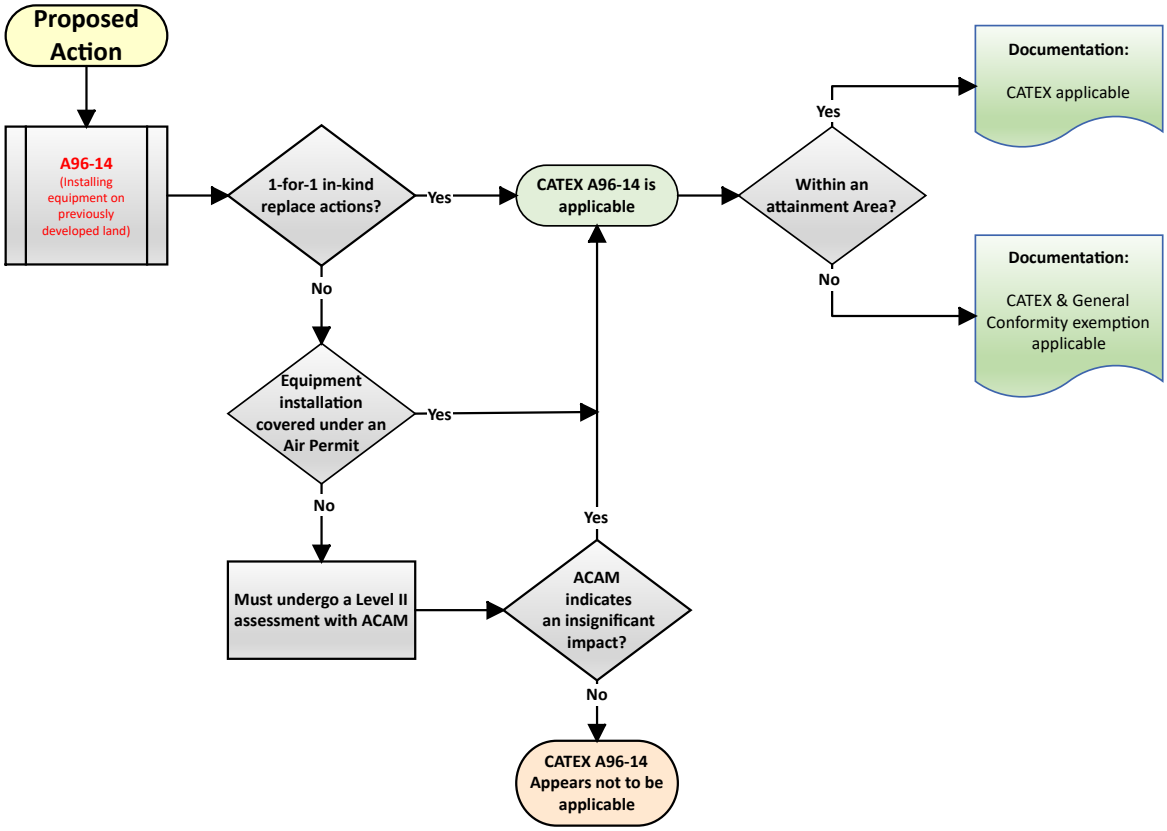
7.14 DoW A96-14

"Installing on previously developed land, equipment that does not substantially alter land use (i.e., land use of more than one acre). This includes outgrants to private lessees for similar construction. The EPF must document application of this CATEX on AF Form 813."

Step 3, De Minimis Action Check:
This CATEX is too broad as written to exclude air quality issues or exempt General Conformity requirements unless the equipment is an in-kind replacement, or it does not emit air pollutants. Rate of air emissions from equipment and associated regulatory requirements are not dependent on land size or previous land development; therefore, any new equipment that emits air pollutants and is not otherwise exempt must be assessed for AQIA and General Conformity applicability.

Assuming that the equipment will emit air emissions, this CATEX (from an air quality perspective) only directly applies to one-for-one in-kind (e.g., same or lower fuel consumption, same or lower horsepower, same or lower operating hours, etc.) repair and replacement of existing real property equipment that was previously installed. If the repair and replacement is not a one-for-one in-kind (e.g., same or lower fuel consumption, same or lower horsepower, same or lower operating hours, etc.) replacement or new equipment, there is no unilateral method of knowing for sure that installation or replacement of equipment will generate the same or less emissions than the original equipment being replaced. As we have previously demonstrated, any increase in emissions above the insignificance indicator signifies that the proposed action has an extraordinary circumstance which prohibits the use of the CATEX.

Figure 7-4, CATEX DoW A96-14 Applicability Flowchart



Therefore, if the equipment to be installed is not a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement, it must be evaluated for "extraordinary circumstances". Evaluating an action for "extraordinary circumstances" can be accomplished with a rapid ACAM/sAIR screening assessment. If the ACAM/sAIR shows the action will NOT potentially result in significant short- or long-term impacts, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) (a copy of the ACAM/sAIR report should be attached to the DAF Form 813).

Required Documentation (One-for-One In-Kind Replacement):
"In-kind replacement action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Required Documentation (Not One-for-One In-Kind Replacement but With Air Permit):

- Air quality is not an extraordinary circumstance for not in-kind replacement actions when the equipment will be included in a permit under the new source review (NSR) program (Section 110(a)(2)(c) and Section 173 of the Act) or the prevention of significant deterioration program (Title I, Part C of the Act).
- However, documentation is required, specifically state: "Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies; both apply conditionally on meeting permit requirements."

Required Documentation (Not One-for-One In-Kind Replacement and Without Air Permit):

- ACAM/sAIR assessment needed in order to assess the impact to air quality.
  - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach the ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
  - **If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

7.15 <u>DoW A97-15</u>

"Laying-away or mothballing a production facility or adopting a reduced maintenance level at a closing installation when (1) agreement on any required historic preservation effort has been reached with the state historic preservation officer and the Advisory Council on Historic Preservation, and (2) no degradation in the environmental restoration program will occur."

Step 1, No Net Increase Evaluation:
Downsizing of agency's existing activities; therefore, no net increase in emissions. <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Downsizing of existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.16 <u>DoW A98-16</u>

"Acquiring land and ingrants (50 acres or less) for activities otherwise subject to CATEX. The EPF must document application of this CATEX on AF Form 813."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(xiv): "Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer." Note that this only applies if activities to occur on the acquired land are also CATEXable. <u>Under this condition, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"No net increase in emissions; therefore, air quality is not extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiv) applies."

7.17 DoW A99-17

"Transferring land, facilities, and personal property for which the General Services Administration (GSA) is the action agency. Such transfers are excluded only if there is no change in land use and GSA complies with its NEPA requirements."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(xix): "Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Transfers of ownership activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xix) applies."

7.18 DoW A100-18

"Transferring administrative control of real property within the Air Force or to another military department or to another Federal agency, not including GSA, including returning public domain lands to the Department of the Interior."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(xx): "Transfers of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity and assignments of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity for subsequent deeding to eligible applicants." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Transfers of administrative control activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xx) applies."

7.19 DoW A101-19

"Granting easements, leases, licenses, rights of entry, and permits to use Air Force controlled property for activities that, if conducted by the Air Force, could be categorically excluded in accordance with this Appendix. The EPF must document application of this CATEX on AF Form 813."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(xi): "The granting of leases, licenses such as for exports and trade, permits, and easements where activities conducted will be similar in scope and operation to activities currently being conducted." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Lease/license activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xi) applies."

7.20 DoW A102-20

"Converting in-house services to contract services."

Step 1, No Net Increase Evaluation:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine/administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.21 DoW A103-21

"Routine personnel decreases and increases, including work force conversion to either on-base contractor operation or to military operation from contractor operation (excluding base closure and realignment actions which are subject to congressional reporting under 10 U.S.C. 2687). "

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.22 DoW A104-22

"Routine, temporary movement of personnel, including deployments of personnel on a TDY basis where existing facilities are used."

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.23 DoW A105-23

"Personnel reductions resulting from workload adjustments, reduced personnel funding levels, skill imbalances, or other similar causes."

Step 1, No Net Increase Evaluation:
Routine activities and downsizing of agency existing activities; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

7.24 DoW A106-24

"Study efforts that involve no commitment of resources other than personnel and funding allocations."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." CATEX is also administrative in nature for DAF and does not generate emissions; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

7.25 DoW A107-25

"The analysis and assessment of the natural environment without altering it (inspections, audits, surveys, investigations). This CATEX includes the granting of any permits necessary for such surveys, provided that the technology or procedure involved is well understood and there are no adverse environmental impacts anticipated from it. The EPF must document application of this CATEX on AF Form 813."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." Also, CATEX is administrative in nature activities for DAF and activities that do not generate emissions; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Environmental study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

7.26 DoW A108-26

"Undertaking specific investigatory activities to support remedial action activities for purposes of cleanup of Environmental Restoration Account (ERA)—Air Force and Resource Conservation and Recovery Act (RCRA) corrective action sites. These activities include soil borings and sampling, installation, and operation of test or monitoring wells. This CATEX applies to studies that assist in determining final cleanup actions when they are conducted in accordance with legal agreements, administrative orders, or work plans previously agreed to by EPA or state regulators."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Environmental restoration study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

7.27 DoW A109-27

"Normal or routine basic and applied scientific research confined to the laboratory and in compliance with all applicable safety, environmental, and natural resource conservation laws."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(d)(3) applies."

7.28 DoW A110-28

"Routine transporting of hazardous materials and wastes in accordance with applicable Federal, state, interstate, and local laws."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c) (2)(vii): "The routine, recurring transportation of material and personnel." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine HAZMAT transport with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(vii) both apply."

7.29 DoW A111-29

"Emergency handling and transporting of small quantities of chemical surety material or suspected chemical surety material, whether or not classified as hazardous or toxic waste, from a discovery site to a permitted storage, treatment, or disposal facility."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(2): "Actions in response to emergencies which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e)." Also meets the description of EPA 40 CFR 93.153 (e): "Federal actions which are part of a continuing response to an emergency or disaster under paragraph (d)(2) of this section and which are to be taken more than 6 months after the commencement of the response to the emergency or disaster under paragraph (d)(2) of this section are exempt from the requirements of this subpart." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) both apply."

7.30 DoW A112-30

"Immediate responses to the release or discharge of oil or hazardous materials in accordance with an approved Spill Prevention and Response Plan or Spill Contingency Plan or that are otherwise consistent with the requirements of the National Contingency Plan."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(2): "Actions in response to emergencies which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e)." Also meets the description of EPA 40 CFR 93.153 (c)(4): "Actions which implement a decision to conduct or carry out a conforming program such as prescribed burning actions which are consistent with a conforming

land management plan." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) applies."

7.31 DoW A113-31

"Relocating a small number of aircraft to an installation with similar aircraft that does not result in a significant increase of total flying hours or the total number of aircraft operations, a change in flight tracks, or an increase in permanent personnel or logistics support requirements at the receiving installation. Repetitive use of this CATEX at an installation requires further analysis to determine there are no cumulative impacts. The EPF must document application of this CATEX on AF Form 813."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153 (c)(2)(xiii): "Routine operation of facilities, mobile assets and equipment." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Insignificant increase in aircraft operations with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiii) applies."

7.32 DoW A114-32

"Temporary (for less than 30 days) increases in air operations up to 50 percent of the typical installation aircraft operation rate or increases of 50 operations a day, whichever is greater. Repetitive use of this CATEX at an installation requires further analysis to determine there are no cumulative impacts."

Step 3, De Minimis Action Check:
This CATEX potentially allows for too large of an increase in flight operations to exclude air quality from being a potential extraordinary circumstance or to exempt General Conformity requirements. The CATEX allows for less than 30 days up to 50 percent of typical installations' aircraft operations or 50 operations per day, whichever is greater. This scenario was evaluated based on the currently available (January 2025) flight data extracted from DAF-wide BaseOps files, and worst-case flight cycle emission analysis (Solutio 2025). Because of the broadness of this CATEX, the worst-case insignificant number of operations per year while remaining under the de minimis indicator value for each attainment status was calculated to determine how many flight cycles can be included in a temporary increase in operations (Solutio 2026a). The following assumptions were made,

1) **Attainment Status Driven:** Assuming the CATEX would only be taken once in any given year, the worst-case maximum number of flight operations allowed under the CATEX would be based on the attainment status for the action.

2) **Worst-Case Allowable Number of Flight Operations:** The worst-case flight cycles (i.e., one frequency-weighted representative Landing and takeoff [LTO] cycle plus one frequency weighted representative Closed Pattern [CP] cycle) for every aircraft in the available BaseOps files were developed, and the criteria pollutant emissions per flight cycle were derived. The worst-case aircraft was then identified for each pollutant using the criteria pollutant emissions per fight cycle. Then, the allowable number of flight operations (one flight operation = one complete LTO cycle + one complete CP cycle) was calculated by dividing the attainment status insignificance indicator value by each worst-case aircrafts' emissions per flight cycle.

When deciding whether or not this CATEX should be taken, the decision-maker should compare the temporary increase in flight cycles to the worst-case allowable number of operations seen in *Table 7-2, Number of Allowable Flight Operations/Year*. If the temporary increase of operations is below the allowable number of flight operations for each pollutant and relevant attainment status, this CATEX can be taken.

Table 7-2, Number of Allowable Flight Operations/Year

Attainment Status	Number of Allowable Flight Operations/Year (Based on Attainment Status)		
	Ozone	NOx, SOx, & CO	PM10 & PM2.5
Nonattainment (Extreme or Severe)	48	N/A	N/A
Nonattainment (Other)	242	484	626
Maintenance	253	484	894
Attainment	1,211		

Notes:
For "Attainment" the Number of Allowable Flight Operations/Year based on Ozone and NOx as a limiting pollutant
One flight operation = one complete LTO cycle (landing and takeoff) plus one CP cycle

Using the table above, a decision-maker can determine whether or not this CATEX can be taken without an ACAM/sAIR assessment. Air quality is not an extraordinary circumstance as long as the flight operations of the action are below the allowable flight operations for the specific attainment status of the area that the action will occur within. If air quality is not an extraordinary circumstance, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). Note, if the action is occurring within more than one nonattainment area, you must always pick the lowest allowable flight operations/year. For example, if a base is in a nonattainment area for Marginal Ozone and SOx, but is in attainment for the other criteria pollutants, this CATEX would only apply if the temporary

increase in flight operations are ≤ 242 flight operations/yr (i.e., 242 flight operations/yr for Marginal Ozone Nonattainment is less than 484 flight operations/yr for SOx).

Actions in which the temporary increase in flight operations exceeds the applicable allowable number of flight operations require an ACAM or sAIR assessment. In this case, air quality is not an extraordinary circumstance only if the ACAM/sAIR assessment indicates an insignificant impact to air quality. If air quality is not an extraordinary circumstance, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- Air quality is only not an extraordinary circumstance without further evaluation (i.e., ACAM or sAIR) as long as the proposed increase in flight operations/yr (one flight operation = one complete LTO cycle + one complete CP cycle) are below the allowable flight operations for the specific attainment status of the area that the action will occur within.
    - Documentation is still required. "Flight operations are ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- If the proposed temporary increase in flight operations/yr (one flight operation = one complete LTO cycle + one complete CP cycle) is over the limiting criteria pollutant's allowable number of flight operations, air quality is not an extraordinary circumstance/this CATEX may **ONLY** be applied if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact.
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach the ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR assessment does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

7.33 DoW A115-33

"Flying activities that comply with the Federal aviation regulations, that are dispersed over a wide area and that do not frequently (more than once a day) pass near the same ground points. This CATEX does not cover regular activity on established routes or within special use airspace."

Step 3, De Minimis Action Check:
This CATEX was developed by DAF relying heavily on the expertise, experience, and judgement of DAF professional staff. Additionally, General Conformity requirement can be an "extraordinary circumstance" for actions that will occur within nonattainment and maintenance areas. Based on the verbiage of the CATEX, there is no quantifiable method to determine "flying activities" nor the areal extent of "dispersed over a wide area". Therefore, this CATEX does not address potential extraordinary circumstances associated with air quality impacts. As a

result, CATEX DoW A115-33 cannot be applied without addressing criteria pollutant emissions and General Conformity as potential extraordinary circumstances associated with air quality impacts.

All flying activities above 3,000 ft AGL are considered to have a de minimis (insignificant) impact on air quality. Therefore, air quality is not an extraordinary circumstance without further evaluation only if all flying activities are above 3,000 ft AGL. In this case, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

All flying activities below 3,000 ft AGL must be further evaluated for potential extraordinary circumstances before this CATEX can possibly be taken.

Required Documentation (All Flight Activity Above 3,000 ft AGL):
"All flight activities will be above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Required Documentation (Any Flight Activity Below 3,000 ft AGL):

- If any flight activities are below 3,000 ft AGL, CATEX may **ONLY** be applied if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR assessment does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

7.34 DoW A116-34

"Supersonic flying operations over land and above 30,000 feet MSL, or over water and above 10,000 feet MSL and more than 15 nautical miles from land."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153 (c)(2)(xxii): "Air traffic control activities and adopting approach, departure, and enroute procedures for aircraft operations above the mixing height specified in the applicable SIP or TIP. Where the applicable SIP or TIP does not specify a mixing height, the Federal agency can use the 3,000 feet above ground level as a default mixing height, unless the agency demonstrates that use of a different mixing height is appropriate because the change in emissions at and above that height caused by the Federal action is de minimis." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Aircraft operations above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(xxii) applies for air quality."

7.35 DoW A117-35

"Formal requests to the FAA, or host-nation equivalent agency, to establish or modify special use airspace (for example, restricted areas, warning areas, military operating areas) and military training routes for subsonic operations that have a base altitude of 3,000 feet above ground level or higher. The EPF must document application of this CATEX on AF Form 813, which must accompany the request to the FAA."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153 (c)(2)(xxii): "Air traffic control activities and adopting approach, departure, and enroute procedures for aircraft operations above the mixing height specified in the applicable SIP or TIP. Where the applicable SIP or TIP does not specify a mixing height, the Federal agency can use the 3,000 feet above ground level as a default mixing height, unless the agency demonstrates that use of a different mixing height is appropriate because the change in emissions at and above that height caused by the Federal action is de minimis." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Aircraft operations above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(xxii) applies for air quality."

7.36 DoW A118-36

"Adopting airfield approach, departure, and en route procedures that are less than 3,000 feet above ground level, and that also do not route air traffic over noise-sensitive areas, including residential neighborhoods or cultural, historical, and outdoor recreational areas. The EPF may categorically exclude such air traffic patterns at or greater than 3,000 feet above ground level regardless of underlying land use."

Step 3, De Minimis Action Check:
This CATEX was developed by DAF relying heavily on the expertise, experience, and judgement of DAF professional staff. Additionally, General Conformity requirement can be an "extraordinary circumstance" for actions that will occur within nonattainment and maintenance areas. Therefore, this CATEX does not address potential extraordinary circumstances associated with air quality impacts. As a result, CATEX DoW A118-36 cannot be applied without addressing criteria pollutant emissions and General Conformity as potential extraordinary circumstances associated with air quality impacts.

All flying activities above 3,000 ft AGL are considered to have a de minimis (insignificant) impact on air quality. Therefore, air quality is only not an extraordinary circumstance without further evaluation if all flying activities are above 3,000 ft AGL. Here, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

All flying activities below 3,000 ft AGL with no increases in LTO or CP cycles are considered to have a de minimis (insignificant) impact on air quality. Therefore, in this scenario, air quality is only not an extraordinary circumstance without further evaluation if all flying activities are

below 3,000 ft AGL with no increases in LTO or CP cycles. Here, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

All flying activities below 3,000 ft AGL with increases in LTO or CP cycles have a potential for increased emissions; therefore, must be further evaluated for potential extraordinary circumstances (i.e., ACAM assessment) before this CATEX can possibly be taken.

Required Documentation (Aircraft Operations Above 3,000 ft AGL):
"Aircraft operations are above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(1) applies."

Required Documentation (Aircraft Operations Below 3,000 ft AGL and No Increase in LTO or CP Cycles):
"No increase in LTO or CP cycles; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Required Documentation (Aircraft Operations Below 3,000 ft AGL and Increase LTO or CP Cycles):

- Without further evaluation, CATEX does not apply if adopted aircraft operations are below 3,000 ft AGL and increases in LTO or CP cycles will occur. CATEX may ONLY be applied if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact.
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(1) applies."
    - **If ACAM/sAIR assessment does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

7.37 DoW A119-37

"Participating in air shows and fly-overs by Air Force aircraft at non-Air Force public events after obtaining FAA coordination and approval."

Step 3, De Minimis Action Check:
Air shows and fly-overs are routine activities for DAF worldwide; however, they are infrequent and may involve new (additional) emission sources. To verify this CATEX as a de minimis activity, an assessment was performed for a worst-case air show (Solutio 2026b).

From an air quality perspective, the analysis of this CATEX is effectively the same as CATEX DoW A120-38. The only difference is that attendee travel does not need to be accounted for. The analysis from CATEX DoW A120-38 less the attendee travel was used for CATEX DoW A119-37 (for detailed analysis see CATEX DoW A120-38 below).

Table 7-3, Allowable DAF Fly-Overs at Non-DAF Event

Attainment Status	Number of Allowable Flight Operations/Year (Based on Attainment Status)				
	Ozone	NOx	SOx	CO	PM10 & PM2.5
Nonattainment (Extreme or Severe)	354	N/A	N/A	N/A	N/A
Nonattainment (Other)	1,774	3,670	37,134	2,147	5,555
Maintenance	1,774	3,670	37,134	2,147	7,936
Attainment	5,368				

Note:
For "Attainment" the Number of Allowable Flight Operations is based on CO as a limiting pollutant

Based on *Table 7-3, Allowable DAF Fly-Overs at Non-DAF Event*, air shows using up to 354 DAF fly-overs would pose an insignificant impact on air quality anywhere in the U.S. regardless of attainment status. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- Air quality is not an extraordinary circumstance at any non-DAF public events.
    - Documentation is still required. "Fly-overs are ≤ 355 allowable number/year (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) both applies."

7.38 DoW A120-38

"Conducting Air Force "open houses" and similar events, including air shows, golf tournaments, home shows, and the like, where crowds gather at an Air Force installation, so long as crowd and traffic control, etc., have not in the past presented significant safety or environmental impacts."

Step 3, De Minimis Action Check:
Generally open-houses and similar events are routine activities for DAF worldwide; however, they are infrequent and may involve new (additional) emission sources. To verify this as a de minimis activity, an assessment was performed for a worst-case air show. Air shows have historically been the largest DAF open house or similar events. Therefore, air shows have been evaluated as the worst DAF open houses and similar events (e.g., air shows, golf tournaments, home shows, and the like) as they represent the maximum reasonably foreseeable emissions scenario among DAF open houses and similar events (Solutio 2026c).

The Miramar Air Show (Marine Corps, San Diego, CA) is the largest U.S. military air show with over 100 aircraft and over 700,000 attendees over three days. Using the Miramar Air Show as the basis for establishing a worst-case scenario (i.e., worst-case event), the following assumptions were made:

- To be conservative, a worst-case of 125 aircraft (25% greater than Miramar) was used. Each flying one flight cycle.

- Air show lasts three days with 800,000 attendees travelling two persons per vehicle over the course of the air show.
    - Assumed 50 miles/roundtrip
- One flight cycle of any aircraft flown in the air show is equal to one LTO cycle plus one CP cycle.
- All aircraft flown for the air show are conservatively represented by the DAF average worst-case aircraft.
- Attainment status of the area that the air show occurred within dictated the allowable emissions generated by the air show.

The following general methodology was used to establish the maximum number of aircraft flight cycles participating in the air show:

- Fly-overs were not evaluated given air shows involve complete flight cycles that result in more emissions than fly-over events.
- Total vehicles to and from the air show are assumed to be 400,000 (800,000 attendees travelling two persons per vehicle).
    - The emissions from attendees' vehicles were estimated using ACAM.
- All aircraft flown for the show are conservatively represented by a DAF "Representative Aircraft" which is the average of DAF's twelve worst-case aircraft.
    - Twelve DAF worst-case aircraft identified per grouping and type; established based on the currently available (January 2025) flight data extracted from DAF-wide BaseOps files, and worst-case flight cycle emission analysis (Solutio 2025).
        - Emissions for a single LTO and CP cycle for each of the twelve worst-case aircraft were estimated using ACAM.
        - The emissions for one LTO and one CP cycle for each of the twelve worst-case aircraft were averaged to obtain the representative LTO and CP cycle emissions for the "Representative Aircraft."
- Given the attainment status of the area that the air show occurred within dictated the allowable emissions generated by the air show; the attainment, nonattainment, and maintenance insignificance indicator values established the allowable emissions for the air show (see *Table 5-7, DAF Air Quality POC Insignificance Indicators*).
- Air emissions generated from attendees traveling to the show were subtracted from each attainment, nonattainment, and maintenance insignificance indicator value to create the maximum remaining allowable air emissions.
- The allowable number of aircraft flight cycles (i.e., one LTO cycle plus one CP cycle) that can be flown were calculated by dividing the remaining maximum allowable air emissions per pollutant by the Representative Aircraft's emissions per flight cycle.

Table 7-4, Number of Allowable Flight Operations per Air Show

Attainment Status	Number of Allowable Flight Operations				
	Ozone	NOx	SOx	CO	PM10 & PM2.5
Nonattainment (Extreme or Severe)	125	N/A	N/A	N/A	N/A
Nonattainment (Other)	1,545	3,538	37,110	371	5,503
Maintenance	1,545	3,538	37,110	371	7,884
Attainment	3,592				

Note:
For "Attainment" the Number of Allowable Flight Operations is based on CO as a limiting pollutant

Based on *Table 7-4, Number of Allowable Flight Operations per Air Show,* DAF air shows performing 125 flight cycles (125 aircraft flying one cycle each), which is equal to the most restrictive number of allowable flight operations (125 flight operations), would pose an insignificant impact on air quality. The assumed worst-case event (i.e., Miramar Air Show occurring within an extreme nonattainment ozone area) is equal to 125 allowable flight operations. Therefore, with air shows being the worst-case event, "open houses" and similar events (including air shows, golf tournaments, home shows, and the like, where crowds gather at a DAF installation) will not pose a significant impact on air quality. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- Air quality is not an extraordinary circumstance at any DAF open houses and similar events (including air shows, golf tournaments, home shows, and the like, where crowds gather at a DAF installation).
    - Documentation is still required. "DAF open houses and similar events do not pose a significant impact to air quality; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies (see 2026 DAF CATEX Evaluation)."

8 DA CATEX EVALUATION ASSESSMENT

8.1 DoW A1-1

"Routine law and order activities performed by police, physical plant protection and security personnel, and civilian natural resources and environmental law officers. This includes defense support to civil authorities and search and rescue operations"

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.2 DoW A2-2

"Emergency or disaster assistance provided to Federal, State, or local entities"

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(2): "Actions in response to emergencies which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e)." May also meet the description of EPA 40 CFR 93.153 (e): "Federal actions which are part of a continuing response to an emergency or disaster under paragraph (d)(2) of this section and which are to be taken more than 6 months after the commencement of the response to the emergency or disaster under paragraph (d)(2) of this section are exempt from the requirements of this subpart." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Emergency response activity; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153(d)(2) and 40 CFR 93.153(e) apply."

8.3 DoW A3-3

"Preparation, revision, and promulgation of regulations, policies, directives, procedures, manuals, and guidance documents that implement HQDA or other federal agency regulations, policy, procedures, manuals, and guidance documents that have been the subject of previous NEPA review or do not have substantial impacts on the environment"

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.4 DoW A4-4

"Proposed administrative activities and operations to be conducted in an existing structure that are within the scope and compatibility of the present functional use of the structure. This includes all routine administrative functions of any kind; examples include, but are not limited, to military and civilian personnel recruitment, hiring, paying, supervision, and management; budgets, appropriations, and contracts planning, administration, and management; documents and records preparation, management, and distribution; investigations, inspections, analyses, and studies planning, execution, and documentation; educational and public outreach material development and distribution; and communications, briefs, and staffing actions."

Step 1, No Net Increase Evaluation:

Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.5 DoW A5-5

"Normal personnel, fiscal, and administrative activities involving military and civilian personnel (recruiting, processing, paying, and records keeping)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.6 DoW A6-6

"Routine management of buildings, facilities, utilities, training areas, and ranges in order to support routine use and enable timely maintenance and repair. This CX includes all management activities to enable and maintain the full functionality of the site."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.7 DoW A7-7

"Routine morale, welfare, and recreation activities not involving off-road recreational vehicles."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.8 DoW A8-8

"Deployment of military forces on a temporary duty or training basis where existing facilities are used for their intended purposes consistent with the scope and size of existing mission."

Step 2, Predetermined PTC Evaluation:
If future activities conducted will be similar in scope and operation to activities currently being conducted, meets the description of EPA 40 CFR 93.153 (c)(2)(x) "Actions, such as the following, with respect to existing structures, properties, facilities and lands where future activities conducted will be similar in scope and operation to activities currently being conducted at the existing structures, properties, facilities, and lands; for example, relocation of personnel, disposition of federally-owned existing structures, properties, facilities, and lands, rent subsidies, operation and maintenance cost subsidies, the exercise of receivership or conservatorship authority, assistance in purchasing structures, and the production of coins and currency." For air quality assessments "similar in scope" means that the action is equal to or less than the scope, activity, and size of the FONSI action and means the same relative location (i.e., within the same contiguous property) and attainment status. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

If an action differs in location or has a different attainment status than the FONSI action or the FONSI action's ACAM/sAIR file is not available, the project/action CANNOT use this CATEX without a further air quality assessment (e.g., ACAM) showing an insignificant impact. If the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Action similar in scope and operation to activities currently being conducted; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(x) applies."

8.9 DoW A9-9

"Routine travel and movement of personnel, vehicles, watercraft, aircraft, equipment, and other materiel and commercial goods."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.10 DoW A10-10

"Approval of asbestos or lead-based paint management plans drafted in accordance with applicable laws and regulations (REC required)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.11 DoW A11-11

"Special events and routine community relations events, whether on or off the installation. These include educational, technical, advisory, and consultation activities where the Army engages with communities, government and private organizations and individuals, Federally recognized Indian tribes, and the general public. These include, for example, ceremonies, funerals (to include state funerals), open houses, town halls, air shows, athletic events, flyovers, Earth Day events, and concerts (REC required for air shows and flyovers)."

Step 3, De Minimis Action Check:
Worst-case equivalent to CATEX DoW A120-38's analysis; therefore, CATEX DoW A120-38 should be used for DAF actions when applicable. As demonstrated in CATEX DoW A120-38's de minimis evaluation, an air show (as the worst-case special event for DAF) would pose an insignificant impact to air quality. Therefore, this CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- Air quality is not an extraordinary circumstance at any DAF open houses and similar events (including air shows, golf tournaments, home shows, and the like, where crowds gather at a DAF installation).
    - Documentation is still required. "DAF open houses and similar events do not pose a significant impact to air quality; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) apply (see 2026 DAF CATEX Evaluation)."

8.12 DoW A12-12

"Temporary closure or temporary restriction of access to roads, trails, recreational areas, and/or any lands within the boundaries of a military installation or within DoD real estate ease agreement land holdings in order to protect human or animal life, other natural or cultural resources, or for military training or security/law enforcement purposes (REC required)."

Step 1, No Net Increase Evaluation:
Closure activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Closure activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.13 DoW A13-13

"Reductions and realignments of civilian and/or military personnel that fall below the thresholds for actions reportable to Congress, as prescribed by statute (for example, 10 U.S.C. § 2687(a)(2) and 10 U.S.C. § 993). This includes reorganizations and reassignments with no changes in force structure, unit re-designations, and routine administrative reorganizations and consolidations (REC required when the net change in military and civilian authorizations at a military installation meets the threshold for forwarding a stationing package to the DCS, G–3/5/7)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.14 DoW A14-14

"Relocation of personnel into existing federally-owned (or state-owned in the case of ARNG) or commercially-leased space (REC required when the net change in military and civilian authorizations at a military installation meets the threshold for forwarding a stationing package to the DCS, G–3/5/7)."

Partial Step 1, No Net Increase Evaluation (Relocation within the Same Facility):
If personnel are being relocated from one space to a different space in the same facility (e.g. relocating personnel from one building to another building on the same base), this activity results in no net increase in emissions. In this scenario, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Relocation to Different Facility):
If the action is a permanent increase in personnel, there is potential for a large net increase in emissions. Personnel actions have the potential to cause a large net increase in emissions primarily through an increase in on-road vehicles. As a result, personnel CATEXs without conditions cannot be entirely validated as the size and scope of the personnel increase cannot be assessed without further evaluation. To verify personnel increases as de minimis actions, a de minimis activity evaluation was performed for a worst-case increase in personnel (see *Attachment B: Worst-Case Personnel Increase ACAM Analysis*). In this analysis, it was assumed that the action was a permanent increase of 4,600 personnel. It was also assumed the ROI was in an area that is in the most severe nonattainment classification for each criteria pollutant and precursor. The following emissions were calculated for the scenario described:

Table 8-1, Worst-Case Permanent Personnel Increase POC Emissions

Annual POC Emissions (ton/year)					
VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
7.64	3.68	97.30	0.08	0.57	0.20

Table 8-1, Worst-Case Permanent Personnel Increase POC Emissions, shows emissions falling below the most stringent de minimis thresholds for every POC in *Table 5-7, DAF Air Quality POC Insignificance Indicators*. The 4,600 person threshold represents the maximum personnel increase that remains below de minimis thresholds for all criteria pollutants under worst case nonattainment conditions. Personnel increases above 4,600 personnel require an ACAM/sAIR assessment. In this case, the CATEX may only be taken if the ACAM/sAIR assessment indicates an insignificant impact to air quality. If the increase is less than 4,600 personnel and/or the ACAM/sAIR assessment results in an insignificant impact, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation (Relocation within the Same Facility):
"Routine activity with no net increase in emissions; therefore, CATEX applies for air quality and General Conformity does not apply."

Required Documentation (Relocation to Different Facility):

- Without further evaluation, air quality is not an extraordinary circumstance only if the proposed increase in personnel is ≤ 4,600.
    - Documentation is still required. "Increase in personnel is insignificant for air quality; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies (see 2026 DAF CATEX Evaluation)."
- If the proposed increase in personnel is over 4,600, this air quality is not an extraordinary circumstance **ONLY** if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact.
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR assessment does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.15 DoW A15-15

"An Army action occurring on another military service's property where the action qualifies for a CX of that military service, or for actions on property designated as a Joint Base or Joint Region that qualifies for a CX of any of the military services included as part of the Joint Base or Joint Region. When the Army proponent chooses to use another military service's CX to cover a proposed action, the proponent must have verification that the other service does not object to using their CX to cover the Army action. The Army proponent will include that verification in the administrative record for the proposed action. The Army official making the

CX determination must ensure the application of the CX is appropriate and that the Army proposed action was a type contemplated when the CX was established by the other service, and that no extraordinary circumstances exist (REC required).”

Step 3, De Minimis Action Check:
As written in DoW 2026, this CATEX is currently (June 2026) obsolete:

> Categorical Exclusions (CATEXs) established by DoW, are hereby available for all of the DoW, as defined, to use regardless of original establishing agency (i.e., any DoW entity can use another DoW CATEX without having to go through the formal adoption process in the DoW NEPA Implementing Procedures) (Appendix A, DoW 2026).

The DoW, including all of its components, is considered a single “Federal Agency” for the purposes of NEPA’s CATEX provisions. Accordingly, DAF may apply any CATEX listed in DoW 2026 Appendix A without formal adoption, regardless of the DoW component that originally established it. Though these CATEXs are now available for all DoW components, DAF must still check for extraordinary circumstances (air quality is always a potential extraordinary circumstance) before using the desired CATEX, and for air quality, should consult this Guide for guidance.

8.16 DoW A16-16

“Army adoption and application of another Federal agency’s CX to proposed Army actions. Other Federal agency’s CXs may be adopted and applied by Army proponents to any proposed Army action occurring on or off Army property, on another Federal agency’s property, or on property where another Federal agency is operating, when the proposed Army action is substantially the same as an action that is categorically excluded by another Federal agency. A proposed Army action is substantially the same as an action categorically excluded by another Federal agency’s CX when it is of a similar type and scope as the action categorically excluded by another Federal agency, and no extraordinary circumstances exist. If the Army chooses to apply another Federal agency’s CX to address a proposed Army action, the Army proponent must document confirmation that the other Federal agency does not object to the Army’s use of their CX to address the proposed Army action. The Army proponent will document confirmation that the other Federal agency does not object to the Army’s use of their CX in the REC prepared for the proposed Army action (REC required).”

Step 3, De Minimis Action Check:
DAF may adopt and apply CATEXs from non-DoW Federal agencies only in accordance with DoW 2026 Part 1.4(c)–(d). Adoption requires coordination with the originating agency, public notice, and documentation in the administrative record. Applying a CATEX includes a check for extraordinary circumstances (air quality is always a potential extraordinary circumstance) which would preclude the use of the CATEX. For air quality, extraordinary circumstances should be checked through a *Level II, Quantitative Assessment*. Before applying a newly adopted CATEX, which hasn’t been analyzed in this Guide, the *Level II, Quantitative Assessment* should be performed and indicate an insignificant impact to the environment. If the Level II assessment indicates a potential significant impact, air quality appears to be an extraordinary circumstance and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

8.17 DoW A17-1

"Construction of new, alteration of existing (to include replacement or upgrades), and additions to existing buildings, facilities, structures (to include towers that do not present a collision hazard to military aircraft), launch pads, utility systems, and communication systems on previously disturbed land and/or on undisturbed land, provided there are no more than five total (contiguous or non-contiguous) acres of surface disturbance to undisturbed land (REC required). This does not include construction of facilities intended primarily for the transportation, distribution, storage, treatment, and disposal of solid waste, medical waste, and hazardous waste. Previously disturbed land has been changed such that its ecological processes have been and remain altered by human activity and encompasses areas that have been transformed from native vegetation to nonnative species or a managed state. Undisturbed land in its natural state or land which has reverted to its natural state where ecological processes remain unattended by human activity."

Step 3, De Minimis Action Check:
Unfortunately, large construction activities can potentially produce a significant amount of air emissions that could be a health hazard. To verify construction actions as de minimis, a de minimis activity evaluation was performed for the worst-case large scale construction action (see *Attachment C: Worst-Case Large-Scale Construction ACAM Analysis*). The reasonable worst-case large scale construction activity was assumed to be the demolition of a 1,000,000 ft^2 building followed by the construction of a new 1,000,000 ft^2 building. As most DAF buildings are under 1,000,000 ft^2, 1,000,000 ft^2 was seen as a conservative worst-case scenario. Additionally, to ensure the action is de minimis in its worst-case scenario, the ROI was assumed to be in an area that is in the most severe nonattainment classification for each POC. Emissions below these de minimis levels indicate that the action clearly does not have a significant impact on air quality.

The following general assumptions were made:

- Area of existing building assumed to be 1,000,000 ft^2
- A building length to width ratio (L:W) of 2:1 for optimal vehicle travel distance was assumed to apply to the building in the analysis
- For construction actions, the POC emissions generated are overwhelmingly from off-road and on-road vehicles.
- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
- Assumed a DAF average building height of 10 ft
- 1-year total construction project duration chosen as the worst-case scenario
- Project involves all 5 construction phases (demolition, site grading, trenching, building construction, architectural coating, and paving)

Table 8-2, Worst-Case Large-Scale Construction POC Emissions

Annual POC Emissions (ton/year)					
VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
8.934	2.232	2.452	0.005	8.402	0.076

Based on *Table 8-2, Worst-Case Large-Scale Construction POC Emissions*, the demolition and construction of a building up to 1,000,000 ft^2 would result in emissions below the de minimis thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, demonstrating the action would pose an insignificant impact on air quality anywhere in the U.S. regardless of attainment status. Therefore, air quality will not be an extraordinary circumstance for the construction of any project ≤ 1,000,000 ft^2 (maximum building size with insignificant net emissions). In this scenario, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Construction projects > 1,000,000 ft^2 must undergo a *Level II, Quantitative Assessment*, using ACAM/sAIR in order to evaluate air quality impacts. If ACAM/sAIR indicates an insignificant impact to air quality, air quality is not an extraordinary circumstance for the action and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If ACAM/sAIR does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (Construction Project ≤ 1,000,000 ft^2):
"Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."

Required Documentation (Construction Project > 1,000,000 ft^2):

- If construction project > 1,000,000 ft^2, *Level II, Quantitative Assessment*, Necessary
    - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.18 DoW A18-2

"Construction of new and expansion of existing parking lots and hardening of tank trails and turn pads on previously disturbed land and/or on undisturbed land, provided there are no more than 5 total acres of surface disturbance to undisturbed land. If a parking lot design will replicate the pre-development hydrology, limitation may be extended to 10 acres (REC required)."

Step 3, De Minimis Action Check:
Regrettably, parking lot construction activities can potentially produce a level of air emissions that could be a health hazard. CATEX DoW A18-2 "Construction of new and expansion of existing parking lots and hardening of tank trails and turn pads on previously disturbed land and/or on undisturbed land, provided there are no more than 5 total acres of surface disturbance to undisturbed land. If a parking lot design will replicate the pre-development hydrology, limitation may be extended to 10 acres (REC required)" needs further analysis in order to

validate its use for the DAF. An analysis was performed for the worst-case 10-acre parking lot in accordance with the conditions of the CATEX (see *Attachment E: Worst-Case Parking Lot ACAM Analysis*).

The following general assumptions were made:

- Area of parking lot is 10 acres or 435,600 ft^2
- A length to width ratio (L:W) of 2:1 for optimal vehicle travel distance was assumed to apply to the parking lot in the analysis
- For construction actions, the POC emissions generated are overwhelmingly from off-road and on-road vehicles
- 1-year total construction project duration chosen as the worst-case scenario
- Project involves site grading, trenching, and paving

Table 8-3, Worst-Case Parking Lot Construction POC Emissions

Annual POC Emissions (ton/year)					
VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
0.143	1.187	1.585	0.002	18.174	0.044

Based on *Table 8-3, Worst-Case Parking Lot Construction POC Emissions*, construction of a 10-acre parking lot would result in emissions below the de minimis and thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, demonstrating the action would pose an insignificant impact on air quality anywhere in the U.S. regardless of attainment status. Therefore, air quality will not be an extraordinary circumstance for the construction of any parking lot ≤ 10-acres (435,600 ft^2). In this scenario, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Construction of parking lots > 10-acres (435,600 ft^2) must undergo a *Level II, Quantitative Assessment*, using ACAM/sAIR in order to evaluate air quality impacts. If ACAM/sAIR indicates an insignificant impact to air quality, air quality is not an extraordinary circumstance for the action and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If ACAM/sAIR does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (Parking Lot ≤ 10-acres)
"Parking lot construction ≤ 10-acres (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."

Required Documentation (Parking Lot > 10-acres):

- If parking lot construction > 10-acres, *Level II, Quantitative Assessment*, Necessary
    - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact;

therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.19 DoW A19-3

"Placement and replacement of targetry and other stationary equipment on existing ranges provided there are no more than 5 total acres of surface disturbance to undisturbed land (REC required)."

Partial Step 1, No Net Increase Evaluation (Equipment is Not a Source of Emissions or is a One-for-One In-Kind Replacement):
If the placed stationary equipment is not a source of emissions, this action will result in no net increase in emissions and air quality is not an extraordinary circumstance. This action will also result in no net increase in emissions if the stationary equipment is a source of emissions but is a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement. The CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, Demonstrated Action Check: (Equipment is a Source of Emissions and is Not a One-for-One In-Kind Replacement):
If the replacement is not a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement, there is no unilateral method of knowing for sure that a replacement of equipment will generate the same or less emissions than the original equipment being replaced. As we have previously demonstrated, any increase in emissions above the insignificance indicator signifies that the proposed action has an extraordinary circumstance which prohibits the use of the CATEX.

Therefore, if replacement is not a one-for-one in-kind (e.g., same size or less, same fuel, etc.) replacement, it must be evaluated for "extraordinary circumstances". Evaluating an action for "extraordinary circumstances" can be accomplished with a rapid ACAM/sAIR screening assessment. If the ACAM/sAIR shows the action will NOT potentially result in significant short- or long-term impacts, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) (a copy of the ACAM/sAIR report should be attached to the DAF Form 813).

Required Documentation (If Equipment is Not a Source of Emissions):
"Placed equipment is not a source of emissions; therefore, no net increase in emissions, and General Conformity does not apply."

Required Documentation (If One-for-One In-Kind Replacement):
"In-kind replacement action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Required Documentation (If Source of Emissions and Not In-Kind Replacement but has an Air Permit):
"Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance for CATEX and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) also applies; both apply conditionally on meeting permit requirements."

Required Documentation (If Source of Emissions, Not In-Kind Replacement, and Without Air Permit):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance for the CATEX and General Conformity exemption 40 CFR 93.153 (c)(1) also applies."
- **If ACAM/sAIR does <u>not</u> an indicate insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.20 <u>DoW A20-4</u>

"Installation of fencing, utility systems, and communication systems that use existing right-of-way, and installation of airfield communication and safety equipment (REC required)."

Partial Step 2, Presumed to Conform (If Installation of Utility or Communication System OR Similar to FONSI Action):
If action is the installation of utility or communication system, meets the description of EPA 40 CFR 93.153 (c)(2)(xiii) "Routine operation of facilities, mobile assets and equipment." <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

If future activities conducted will be similar in scope and operation to activities currently being conducted, meets the description of EPA 40 CFR 93.153 (c)(2)(x) "Actions, such as the following, with respect to existing structures, properties, facilities and lands where future activities conducted will be similar in scope and operation to activities currently being conducted at the existing structures, properties, facilities, and lands; for example, relocation of personnel, disposition of federally-owned existing structures, properties, facilities, and lands, rent subsidies, operation and maintenance cost subsidies, the exercise of receivership or conservatorship authority, assistance in purchasing structures, and the production of coins and currency." When using this PTC, the reference NEPA analysis should be attached. For an action to be considered "similar" it must be equal or less in scope, activity, and size of the FONSI action. Additionally, the action must be in the same relative location and have the same attainment status as the FONSI action. <u>CATEX applies under these conditions if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Partial Step 3, De Minimis Action Check (If Installation of Fencing or Safety Equipment):
Large-scale construction action $\leq$ 1,000,000 ft^2; therefore, air quality is not an extraordinary circumstance (see CATEX DoW A17-1). If construction is > 1,000,000 ft^2, action must undergo *Level II, Quantitative Assessment*,with ACAM/sAIR.

Required Documentation (If Installation of Utility or Communication System):
"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiii) applies."

Required Documentation (If Similar to FONSI Action):
Attach relevant FONSI and state "For air quality, the project/action is obviously equal to or less than in scope, activity, and size; at the same relative location; and still has the same attainment status/severity of the previous FONSI. Additionally, the previous FONSI and the associated ACAM assessment are readily available for public review. Therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(x) applies."

Required Documentation (If Installation of Fencing or Safety Equipment):

- Air quality is not an extraordinary circumstance for construction projects ≤ 1,000,000 ft^2
  - Documentation is still required. "Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- If construction project > 1,000,000 ft^2, ACAM/sAIR Assessment Necessary
  - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
  - **If ACAM/sAIR does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.21 <u>DoW A21-5</u>

"Construction, placement, installation, or relocation of machinery and equipment (for example, analytical laboratory apparatus, electronic hardware, maintenance equipment, and health and safety equipment) from another site or structure to the new or altered building/facility/site, assuming the uses of the relocated items will be similar to their former uses (REC required)."

Partial Step 1, No Net Increase Evaluation (Relocation Within Same Facility):
If machinery and equipment are being relocated from one space to another space in the same facility (e.g., relocating machinery from one building to another building on the same base), this activity results in no net increase in emissions. <u>Under these conditions, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Partial Step 3, De Minimis Action Check (Relocation to Different Facility):
If machinery and equipment are being newly constructed and/or are being relocated from one facility to a different facility (e.g., relocating equipment from one base to another base), this activity must be analyzed through a *Level II, Quantitative Assessment*, using ACAM or sAIR (a copy of the ACAM/sAIR report should be attached to the DAF Form 813). If the ACAM/sAIR

report indicates that there is an insignificant impact to air quality, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the ACAM or sAIR does not indicate that there is an insignificant impact, the CATEX does **not** apply.

Required Documentation (Relocation within the Same Facility):
"Relocation of machinery/equipment in the same facility with no net increase emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Required Documentation (New Construction, Installation, and/or Different Facility Relocation):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.22 DoW A22-6

"Demolition of buildings, structures, or other improvements and disposal of debris therefrom, or removal of a part thereof for disposal, in accordance with applicable requirements, to include requirements associated with removal of asbestos, polychlorinated biphenyls (PCBs), lead-based paint, and other special hazards. For historic districts, sites, buildings, structures, or objects eligible for or included in the National Register of Historic Places, all requirements of the NHPA must be met (REC required)."

Step 3, De Minimis Action Check:
Regrettably, construction projects can produce levels of emissions that could be a health hazard. To verify demolition actions are de minimis, a de minimis activity evaluation was performed for the worst-case large-scale demolition activity (see *Attachment D: Worst-Case Demolition ACAM Analysis*). The worst-case demolition activity was assumed to be the demolition of a 6,500,000 ft^2 building, approximately the area of the office space in the Pentagon (Roulo, 2024). As most DAF buildings are well under 6,500,000 ft^2, 6,500,000 ft^2 was seen as a conservative worst-case scenario. Additionally, to ensure the action is de minimis in its worst-case scenario, the ROI was assumed to be in an area that is in the most severe nonattainment classification for each POC. Emissions falling below these de minimis levels indicate that the action clearly does not have a significant impact on air quality.

The following general assumptions were made:

- The area of the existing building was assumed to be 6,500,000 ft^2
    - 6,500,000 ft^2 taken from the pentagon having 6,500,000 ft^2 of office space
- A building length to width ratio (L:W) of 2:1 for optimal vehicle travel distance was assumed to apply to the building in the analysis

- For construction actions, the POC emissions generated are overwhelmingly from off-road and on-road vehicles.
- Assumed a DAF average building height of 10 ft
- 1-year project duration chosen as worst-case scenario
- Project only involves the demolition of the building

Table 8-4, Worst-Case Demolition POC Emissions

Annual POC Emissions (ton/year)					
VOC	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
0.41	4.56	4.10	0.01	13.87	0.16

Based on *Table 8-4, Worst-Case Demolition POC Emissions*, demolition of a building up to 6,500,000 ft^2 would result in emissions below the de minimis thresholds and indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, demonstrating the action would pose an insignificant impact on air quality anywhere in the U.S. regardless of attainment status. Therefore, air quality is not an extraordinary circumstance for demolition actions and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Demolition action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

8.23 DoW A23-7

"Road, firebreak, or trail construction on existing rights-of-ways or on previously disturbed areas to dimensions that meet design standards that permit safe vehicle operation."

Step 3, De Minimis Action Check:
Unfortunately, road construction can lead to significant levels of air emissions that can be harmful to public health. As such, the action must be analyzed through a *Level II, Quantitative Assessment*, to determine if the action will have an insignificant impact on air quality (a copy of the Level II report should be attached to the DAF Form 813). If the *Level II, Quantitative Assessment*, results in emissions above the relevant General Conformity thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, air quality appears to be an extraordinary circumstance. If the *Level II, Quantitative Assessment*, results in emissions below the relevant General Conformity thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, the action is considered to have an insignificant impact on air quality and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- **If *Level II, Quantitative Assessment*, indicates an insignificant impact:** Attach *Level II, Quantitative Assessment*, and state "*Level II, Quantitative Assessment*, indicated an

insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

- **If *Level II, Quantitative Assessment*, does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.24 DoW A24-8

"Construction, in accordance with applicable permits, of new or improved low water crossing and fording areas on existing trails or roads used for training purposes, and storm water conveyances for storm water management, safety, and other purposes. Construction or improvements must permit the flow of water across the crossing/fording. Total ground area disturbed per low water crossing area must not exceed 5 acres (REC required)."

Step 3, De Minimis Action Check:
Large-scale construction action ≤ 1,000,000 ft^2; therefore, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) (see CATEX DoW A17-1). If construction is > 1,000,000 ft^2, action must undergo *Level II, Quantitative Assessment*, with ACAM/sAIR.

Required Documentation (Construction Project ≤ 1,000,000 ft^2):
"Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."

Required Documentation (Construction Project > 1,000,000 ft^2):

- If construction project > 1,000,000 ft^2, *Level II, Quantitative Assessment*, necessary
  - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
  - **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.25 DoW A25-9

"Minor renovations and additions, in accordance with applicable permits, to waterfront facilities, including mooring piles, fixed floating piers, existing piers, unburied power cables, and maintenance and replacement of existing oil booms. (REC required)."

Partial Step 2, Predetermined PTC Evaluation (Routine Activity):
Routine maintenance and repair activities meet the description of EPA 40 CFR 93.153 (c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." If routine maintenance and repair activity, CATEX applies if

there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) For non-routine minor renovations and additions, further evaluation is needed before taking this CATEX.

Partial Step 3, De Minimis Action Check (Non-Routine Activity):
Minor addition, modernization, maintenance, and/or sustainment action; therefore, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) (see CATEX DoW A90-8).

Required Documentation (Routine Activity):
"Routine activity; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Required Documentation (Non-Routine Activity):
"Minor addition, modernization, maintenance, and/or sustainment action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

8.26 DoW A26-10

"Actions in unsewered areas on lands within the boundaries of a military installation or within DoW real estate lease agreement land holdings involving the replacement of existing small (total capacity less than approximately 250,000 gallons per day) on-site wastewater and sewage systems, providing the new onsite systems do not relocate existing discharge (REC required)."

Step 3, De Minimis Action Check:
The project size and scope cannot be determined from this CATEX and is therefore too broad as written to exclude air quality issues or exempt General Conformity requirements. Before taking this CATEX, the action must be analyzed through a *Level II, Quantitative Assessment*, using ACAM or sAIR to determine if the action will have an insignificant impact on air quality (a copy of the ACAM/sAIR report should be attached to the DAF Form 813). If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX may be applied. If the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation:

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.27 DoW A27-11

"Construction or installation, to include modification, of fencing, gates, grates, walls, small enclosures, stakes, signage, cattle guards, and other small appurtenances or devices (for example, raptor electrocution prevention devices) attached to the land for the purposes of security or to otherwise protect human life, animal life, or other resources."

Step 3, De Minimis Action Check:
Large-scale construction action ≤ 1,000,000 ft^2; therefore, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.) (see CATEX DoW A17-1). If construction is > 1,000,000 ft^2, action must undergo *Level II, Quantitative Assessment*, with ACAM/sAIR.

Required Documentation (Construction Project ≤ 1,000,000 ft^2):
"Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."

Required Documentation (Construction Project > 1,000,000 ft^2):

- If construction project > 1,000,000 ft^2, *Level II, Quantitative Assessment*, Necessary
    - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.28 DoW A28-12

"Construction and modernization of common small arms ranges on previous or existing range sites in Army training and testing areas requiring total disturbance of approximately 40 acres or less, without change to noise contours that would potentially increase noise impacts to sensitive receptors and without change to existing Surface Danger Zones (SDZs). This includes the construction of a Range Operations Control Area, which contains common range support facilities and parking. This CX also includes the demolition of any old structures on the previously disturbed sites. Small arms ranges typically include weapons that fire ammunition that is .50 caliber or less and hand or launched grenades (REC required)."

Step 3, De Minimis Action Check:
Unfortunately, large-scale construction actions have the potential to cause significant levels of air emissions that can be harmful to public health; therefore, further evaluation is needed before taking this CATEX. For larger-scale construction projects, CATEX DoW A17-1's de minimis action evaluation can be used for construction projects with a project size ≤ 1,000,000 ft^2. In this scenario, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the construction project is larger than 1,000,000 ft^2, a *Level II,*

Quantitative Assessment, indicating the action will be de minimis is necessary before taking the CATEX (a copy of the ACAM/sAIR report should be attached to the DAF Form 813).

For minor arm range modernization actions, CATEX DoW A90-8's de minimis action evaluation can be used. For modernization actions, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.)

Required Documentation (Modernization Action):
"Minor addition, modernization, maintenance, and/or sustainment action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Required Documentation (Large-Scale Construction Project):

- Air quality is not an extraordinary circumstance for construction projects ≤ 1,000,000 ft^2
  - Documentation is still required. "Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- If construction project > 1,000,000 ft^2, *Level II, Quantitative Assessment*, Necessary
  - **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
  - **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.29 DoW A29-13

"Reconstruction, repair, restoration, retrofitting, or replacement of any facility, structure, road, or trail (including fencing, gates, parking lots, erosion control structures, storm water control structures, roads, trails, revegetation, removal of debris, or any other infrastructure improvement), that was in use and operation, or was under construction, and was damaged or destroyed due to a natural event, including but not limited to wildfires, floods, earthquakes, landslides, weather events; or an accident, vandalism, or an act of terrorism; and which will substantially conform to the preexisting design, function, and location as the original (REC required; will include consideration of anticipated temporary construction impacts)."

Step 2, Predetermined PTC Evaluation:
Meets the description of 40 CFR 93.153 (d)(2) "Actions in response to emergencies which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e)" and possibly 40 CFR 93.153(e) "Federal actions which are part of a continuing response to an emergency or disaster under paragraph (d)(2) of this section, and which are to be taken more than 6 months after the commencement of the response to the emergency or disaster under paragraph (d)(2) of this section are exempt from the requirements of this subpart." Action also meets the description of EPA 40 CFR 93.153

(c)(2)(iv) "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153(d)(2), 40 CFR 93.153(e), and 40 CFR 93.153 (c)(2)(iv) apply."

8.30 DoW A30-1

"Regeneration of an area to native tree species and other native vegetation species including: site preparation; post-fire rehabilitation activities (such as tree planting, fence replacement, or habitat restoration); timber stand and/or wildlife habitat improvement activities that do not include the use of herbicides and do not require more than 1 mile of road construction; and restoration of wetlands, streams, riparian areas, and other water bodies.(REC required). This does not include forestry operations (see § 32 CFR 651.12 (d) (7))."

Step 3, De Minimis Action Check:
This CATEX is too broad as written to exclude air quality issues or exempt General Conformity requirements. Therefore, before taking this CATEX the action must be analyzed through a *Level II, Quantitative Assessment*, to determine if the action will have an insignificant impact on air quality. If the Level II assessment results in emissions above the relevant General Conformity thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, air quality appears to be an extraordinary circumstance. If the Level II assessment results in emissions below the relevant General Conformity thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, the action is considered to have an insignificant impact on air quality, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- **If the *Level II, Quantitative Assessment*, indicates an insignificant impact:** Attach Level II assessment and state "Level II Quantitative Assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If the *Level II, Quantitative Assessment*, does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.31 DoW A31-2

"Implementation of hunting and fishing policies or regulations that are consistent with state and local regulations and Tribal treaty rights."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.32 DoW A32-3

"Scientific studies, surveys, data collection, monitoring, and information gathering activities that are minimally intrusive to the environment. Examples include, but are not limited to topographic surveys; bird counts; wetland mapping; use of remote sensing technologies; geophysical investigations using sonar; inventories, evaluation, and mitigation for historic properties in accordance with NHPA; other cultural and natural resource surveys, inventories, monitoring, and investigations; and geotechnical testing to support pre-construction investigations and facility design when the geotechnical testing technology used is minimally intrusive to the environment (REC required)."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Environmental study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

8.33 DoW A33-4

"Maintenance, repair, and replacement in kind of archaeological, historical, and endangered/threatened species avoidance markers, fencing, and signs; and maintenance, repair, and replacement in kind of existing fencing to provide improved wildlife ingress and egress."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153 (c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

8.34 DoW A34-5

"Update and implementation of Integrated Natural Resources Management Plans (INRMPs) and Integrated Cultural Resources Management Plans (ICRMPs), where plan update and implementation activities are similar in type, scope, and degree to those currently allowed and result in no new adverse effects on the environment (REC required)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.35 DoW A35-6

"Actions to find, contain, and eradicate localized populations of invasive species using control mechanisms listed in the installation Integrated Pest Management Plan (IPMP), provided the invasive species control mechanism affects an area 250 total acres or less in size (REC required)."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153 (c)(4): "Actions which implement a decision to conduct or carry out a conforming program such as prescribed burning actions which are consistent with a conforming land management plan." Also meets the description of EPA 40 CFR 93.153 (c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(4) and 40 CFR 93.153 (c)(2)(iv) also apply."

8.36 DoW A36-7

"Forestry and associated operations focused on the harvest and planting of live trees not to exceed 70 acres. Salvage of dead or dying trees (and adjacent live trees) not to exceed 250 acres to control disease or the spread of insect infestation. Associated operations include no more than 0.5 mile of temporary road construction, and seeding or reforestation of timber areas (REC required)."

Step 3, De Minimis Action Check:
This CATEX is too broad as written to exclude air quality issues or exempt General Conformity requirements due to emissions that can be generated through forestry operations. Therefore, before taking this CATEX the action must be analyzed through a *Level II, Quantitative Assessment*, to determine if the action will have an insignificant impact on air quality. If the

Level II assessment results in emissions above the relevant General Conformity thresholds and insignificance thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, air quality appears to be an extraordinary circumstance. If the Level II assessment results in emissions below the relevant General Conformity thresholds and insignificance indicators in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, the action is considered to have an insignificant impact on air quality, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:

- **If the *Level II, Quantitative Assessment*, indicates an insignificant impact:** Attach Level II assessment and state "Level II Quantitative Assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If the *Level II, Quantitative Assessment*, does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.37 DoW A37-8

"Prescribed burning not to exceed 4,500 acres per prescribed burn project, and mechanical vegetation removal not to exceed 1,000 acres per vegetation removal project, for the purposes of: reducing the risks and severity of wildland fires and fires resulting from Army mission activities; and enhancing the biodiversity, stability, and productivity of the natural environment (REC required)."

Partial Step 2, Predetermined PTC Evaluation (Conforms to Land Management Plan and/or Conducted in Accordance with a Smoke Management Program):
If the action carries out a conforming program consistent with a conforming land management plan, the action meets the description of EPA 40 CFR 93.153 (c)(4) "Actions which implement a decision to conduct or carry out a conforming program such as prescribed burning actions which are consistent with a conforming land management plan." For prescribed fire actions specifically, under relevant conditions, the action meets the description of EPA 40 CFR 93.153 (i)(2) "Prescribed fires conducted in accordance with a smoke management program (SMP) which meets the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA policy." Under either of these conditions, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Does not Conform to Land Management Plan nor Conducted in Accordance with a Smoke Management Program):
Unfortunately, prescribed burns can cause significant levels of air emissions which can be harmful to public health. As such, if the action is not implementing a decision to conduct or carry out a conforming program consistent with a land management plan, or is not a prescribed fire conducted in accordance with a SMP meeting the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA Policy, a *Level II, Quantitative Assessment*, is necessary before using this CATEX. If the Level II assessment

results in emissions above the relevant General Conformity thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, air quality appears to be an extraordinary circumstance. If the Level II assessment results in emissions below the relevant General Conformity thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, the action is considered to have an insignificant impact on air quality and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation (Conforms to Land Management Plan and/or Conducted in Accordance with a Smoke Management Program):

- **If carrying out a conforming program consistent with a land management plan:** "Land management activity carrying out a conforming program consistent with a land management plan; therefore, air quality is not an extraordinary circumstance, and General Conformity Exemption 40 CFR 93.153(c)(4) applies."
- **If action is exclusively a prescribed burn conducted in accordance with a SMP meeting the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA Policy:** "Prescribed fire conducted in accordance with a SMP meeting the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA policy; therefore, air quality is not an extraordinary circumstance, and General Conformity Exemption 40 CFR 93.153(i)(2) applies."

Required Documentation (Does not Conform to Land Management Plan nor Conducted in Accordance with a Smoke Management Program):

- **If the *Level II, Quantitative Assessment*, indicates an insignificant impact:** Attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
- **If the *Level II, Quantitative Assessment*, does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.38 DoW A38-1

"Routine procurement of goods and other services (complying with applicable procedures for procurement of sustainable goods and services) to support operations and infrastructure, and routine utility services and contracts."

Step 1, No Net Increase Evaluation:
Routine activity for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.39 DoW A39-2

"Procurement, installation or replacement, or operation of utility and communication systems, mobile antennas, data processing equipment and similar electronic equipment that use existing right-of-way, easement, distribution systems, and/or facilities (REC required)."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(iv): "Routine maintenance and repair activities, including repair and maintenance of administrative sites, roads, trails, and facilities." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) both apply."

8.40 DoW A40-3

"Conversion of commercial activities to military activities. This includes only those actions that do not change the actions or the missions of the organization or alter the existing land use patterns."

Step 1, No Net Emissions Increase:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine/administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.41 DoW A41-4

"Modification, product improvement, or configuration engineering design change to materiel, structure, or item that does not change the original impact of the materiel, structure, or item on the environment (REC required)."

Step 1, No Net Emissions Increase:
No change on the original impact of the materiel, structure, or item on the environment; therefore, not net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Proposed action has no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.42 DoW A42-5

"Procurement, testing, use, and/or conversion of a commercially available product or non-developmental item (NDI). (A NDI is any previously developed item of supply used exclusively for government purposes by a Federal Agency, a State or local government, or a foreign government with which the United States has a mutual defense cooperation agreement; any item described above that requires only minor modifications or modifications of the type customarily available in the commercial marketplace in order to meet the requirements of the processing department or agency. Such items for example include, forklift, chain saw, security monitoring equipment, software, automobile, commercially-available heavy equipment, etc.) that do not result in any unusual disposal requirements."

Partial Step 1, No Net Emissions Increase (Non-Polluting Emitting Product):
If the product being procured, tested, used, and/or converted is not pollutant emitting, there is no net increase in emissions. Under this condition, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Polluting Emitting Product):
If the product being procured, tested, used, and/or converted is pollutant emitting, there is potential for a significant increase in emissions that can be harmful to public health. In this case, a *Level II, Quantitative Assessment*, must be conducted through ACAM/sAIR before using this CATEX. If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX may be applied, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (Non-Polluting Emitting Product):
"Non-polluting emitting equipment with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Required Documentation (Polluting Emitting Product):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.43 DoW A43-6

"Acquisition or contracting for spares and spare parts, consistent with the approved Technical Data Package (TDP)."

Step 1, No Net Emissions Increase:
No change on the original impact of the materiel, structure, or item on the environment; therefore, not net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Proposed action has no net increase in emissions; therefore, air quality is not an extraordinary circumstance for CATEX, and General Conformity does not apply."

8.44 DoW A44-7

"Modification and adaptation of commercially available products and non-developmental items for military application (for example, sportsman's products and wear such as holsters, shotguns, side arms, protective shields, clothing, backpacks, etc.), as long as modifications do not alter the normal impact to the environment from similar military equipment (REC required)."

Partial Step 1, No Net Emissions Increase (Non-Polluting Emitting Product):
If the product being modified and adapted is not pollutant emitting, there is no net increase in emissions. If the product is not pollutant emitting, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Polluting Emitting Product):
If the product being modified and adapted is pollutant emitting, there is potential for an increase in emissions that can be harmful to public health. In this case, a *Level II, Quantitative Assessment*, must be conducted through ACAM/sAIR before using this CATEX. If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (Non-Pollutant Emitting Equipment):
"Non-polluting emitting equipment with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Required Documentation (Pollutant Emitting Equipment):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.45 DoW A45-8

"Adaptation of non-lethal munitions and restraints from law enforcement suppliers and industry (for example, rubber bullets, stun grenades, and smoke bombs) for military police and crowd control activities where there is no change from the original product design and there are no unusual disposal requirements; the development and use by the military of non-lethal munitions and restraints that are similar to those used by local police forces and in which there are no unusual disposal requirements (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.46 DoW A46-1

"Grants, acquisitions, or terminations of leases, licenses, easements, permits for use of real property or facilities, and land withdrawal continuances or extensions that merely establish time periods in which there is no significant change in land or facility use (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.47 DoW A47-2

"Disposal of excess easement areas to the underlying fee owner (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.48 DoW A48-3

"Transfer of real property administrative control within the Army, to another military department, or to other federal agency, including the return of public domain lands to the Department of Interior, and reporting of property as excess and surplus to the General Services Administration (GSA) for disposal (REC required)."

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(c)(2)(xx): "Transfers of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity and assignments of real property, including land, facilities, and related personal property from a Federal entity to another Federal entity for subsequent deeding to eligible applicants." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Transfers of administrative control activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xx) applies."

8.49 DoW A49-4

"Transfer of active installation utilities to a commercial or governmental utility provider, except for systems on property that has been declared excess and proposed for disposal (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.50 DoW A50-5

"Acquisition of real property (including facilities) where the land use will not change substantially, or where the land acquired will not exceed 40 acres and the use will be similar to Army activities on adjacent land (REC required)."

Partial Step 2, Predetermined PTC Evaluation (No Change in Land Use):
If the land use is not substantially changed, this action meets the description of EPA 40 CFR 93.153(c)(2)(xiv): "Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer." With no change land in use, CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Change in Land Use):
If the land use will change as part of the acquisition, there is the potential for a significant increase in emissions. Therefore, in this case, further evaluation through a *Level II, Quantitative Assessment*, in ACAM or sAIR must be conducted prior to using this CATEX. If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If

the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (No Change in Land Use):
"Transfer of property with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiv) applies."

Required Documentation (Change in Land Use):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- **If ACAM/sAIR does not indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.51 DoW A51-6

"Disposal of real property (including facilities) by the Army where the reasonably foreseeable use will not change significantly (REC required)."

Step 1, No Net Increase Evaluation:
Disposal activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Disposal activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.52 DoW A52-7

"Agreements entered into with an eligible entity or entities under the Army Compatible Use Buffer (ACUB) program, in accordance with 10 U.S.C. § 2684a or under other applicable authorities, that address the use or development of real property in the vicinity of, or ecologically related to, a military installation or military airspace for purposes of limiting any development or use of the property that would be incompatible with the mission of the military installation and/or preserving habitat and cultural resources on the property that may eliminate or relieve current or anticipated restrictions on military testing, training or operations and for which there is no significant change of land use (REC required)."

Step 1, No Net Increase Evaluation:
Administrative activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.53 DoW A53-1

"Routine repair and maintenance of buildings, facilities, launch pads, structures, utility/communication systems, airfields, grounds, parking areas, targetry and other stationary equipment on existing ranges, and fencing; includes associated components and equipment. Examples include, but are not limited to, custodial services performed on existing facilities, removal and disposal of asbestos-containing material (for example, roof material and floor tile) or lead-based paint in accordance with applicable regulations; removal of dead, diseased, or damaged trees; and repair of roofs, doors, windows, or fixtures (REC required for removal and disposal of asbestos-containing material and lead- based paint. REC required for work on structures eligible for or listed in the National Register of Historic Places and structures that are 50 years of age that have not been formally evaluated for historic significance where impacts to such environmentally sensitive resources have been resolved in accordance with NHPA Section 106 regulatory procedures)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.54 DoW A54-2

"Routine repairs and maintenance of existing roads, trails, and firebreaks. Examples include, but are not limited to, grading and clearing the roadside of brush with or without the use of herbicides; resurfacing a road to its original conditions; pruning vegetation; removal of dead, diseased, or damaged trees; replacing or cleaning culverts; and conducting minor soil stabilization activities."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.55 DoW A55-3

"Routine installation, repair, and maintenance of equipment and vehicles (for example, wheeled vehicles, tractors, lawn equipment, airfield equipment [such as runway visual range equipment and visual approach slope indicators], and military vehicles, equipment, and

systems) that is substantially the same as that routinely performed by private sector owners and operators of similar equipment and vehicles. This does not include depot maintenance of unique military equipment."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.56 DoW A56-4

"Repair and maintenance (including replacement and upgrade of parts), and decontamination operations for military equipment conducted at existing enclosed facilities, to include contractor-operated/owned enclosed facilities, consistent with previously established safety levels and in compliance with applicable Federal, State, and local requirements (REC required if proposed action entails a new/modified repair/maintenance operation effecting equipment containing munitions, explosives, or hazardous material, and the operation was not implemented at the enclosed facility during the preceding 5 years; REC required if the proposed action necessitates a new permit or change in an existing permit)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not extraordinary circumstance, and General Conformity does not apply."

8.57 DoW A57-5

"Land repair and maintenance projects for the purpose of mitigating the effects of military training exercises. Examples include, but are not limited to: soil stabilization through revegetation; installing and maintaining erosion control measures; gulley and ravine stabilization; control of invasive vegetation; maintenance of existing structures such a culverts, terraces, and sediment control structures; and maintenance of improved surfaces that are part of the training landscape (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.58 DoW A58-6

"Routine maintenance of streams and ditches or other rainwater conveyance structures and erosion control and stormwater control structures (REC required)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.59 DoW A59-7

"Development, adoption, update, and implementation of an installation pesticide, fungicide, herbicide, insecticide, and rodenticide-use program and plan (IPMP). The IPMP will provide for application of such substances approved for use by the appropriate regulatory agency when the application of such substances is implemented in accordance with the manufacturer's label directions, the IPMP, and INRMP as applicable. (REC required). This categorical exclusion does not apply to implementation of aerial spraying)."

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.60 DoW A60-8

"Closure, decommissioning, mothballing, disconnection, and similar discontinued use of facilities, equipment, vehicles, aircraft, watercraft, and utility and communication systems, whether temporary or permanent (REC required)."

Step 1, No Net Increase Evaluation:
Less activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.61 DoW A61-1

"Use of gauging devices, analytical instruments, and other devices containing sealed radiological sources; use of industrial radiography; use of radioactive material in medical and veterinary practices; possession of radioactive material incident to performing services such as

installation, maintenance, leak tests, and calibration; use of uranium as shielding material in containers or devices; and radioactive tracers (REC required).”

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

8.62 DoW A62-2

“Immediate responses in accordance with emergency response plans (for example, Spill Prevention, Control, and Countermeasure Plan (SPCCP)/Installation Spill Contingency Plan (ISCP), and Chemical Accident and Incident Response Plan) for release or discharge of oil, hazardous materials or hazardous substances; and emergency actions taken by Explosive Ordnance Demolition (EOD) detachment or Technical Escort Unit.”

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(2): “Actions in response to emergencies which are typically commenced on the order of hours or days after the emergency and, if applicable, which meet the requirements of paragraph 40 CFR 93.153(e).” Also meets the description of EPA 40 CFR 93.153 (e): “Federal actions which are part of a continuing response to an emergency or disaster under paragraph (d)(2) of this section and which are to be taken more than 6 months after the commencement of the response to the emergency or disaster under paragraph (d)(2) of this section are exempt from the requirements of this subpart.” CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) and 40 CFR 93.153(e) both apply.”

8.63 DoW A63-3

“Sampling, surveying, well drilling and installation, analytical testing, site preparation, and intrusive testing to determine if hazardous wastes, contaminants, pollutants, or special hazards are present (REC required). No REC required for CERCLA responses or RCRA corrective actions. (See TAB A)”

Step 2, Predetermined PTC Evaluation:
Meets the description of EPA 40 CFR 93.153(d)(3): “Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable

SIP." CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

8.64 DoW A64-4

"Routine management to include the use of hazardous material or waste inventory management systems, transportation, distribution, use, storage, treatment, disposal, recycling, and other waste management activities for solid waste, hazardous waste, medical waste, radiological waste, and special hazards"

Step 1, No Net Increase Evaluation:
Routine activities and operations; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.65 DoW A65-5

"Reutilization, marketing, distribution, donation, and resale of items, personal property, equipment, and materiel, to include normal transfer of items to the Defense Logistics Agency; items, personal property, equipment, and materiel that have been contaminated with hazardous materials or wastes but will be adequately cleaned and will conform to the applicable regulatory agency's requirements."

Step 1, No Net Increase Evaluation:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine HAZMAT transport with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.66 DoW A66-1

"Training entirely of an administrative or classroom nature."

Step 1, No Net Increase Evaluation:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.67 DoW A67-2

"Military training, materiel and systems research, development, engineering, testing, evaluation, and demonstration, and materiel and systems fielding activities conducted in or on existing military structures, ranges, maneuver areas, training areas and access controlled facilities that are: i. Compatible with the current use of existing military structures, ranges, maneuver areas, training areas, and access controlled facilities; ii. Similar in type, degree, and setting to ongoing military activities; and iii. Are conducted in accordance with applicable plans and standard operating procedures protective of the environment. iv. And include but are not limited to: live fire; use of existing SDZs and impact areas; emergency response training; use of missile, rocket and artillery-type projectiles; survivability and vulnerability testing; safety and engineering drills; training exercise modification on a Military Operations in Urban Terrain site or in a shoot house; simulated war games (at existing facilities); and tactical and logistical exercises involving brigade size units or smaller (REC required)."

Partial Step 2, Predetermined PTC Evaluation (Clearly No Environmental Detriment):
As long as no environmental detriment is incurred, this CATEX meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." Unless the action clearly does not cause a net increase in emissions, a *Level II, Quantitative Assessment*, is necessary to prove the action will have an insignificant impact on air quality. If there is clearly no environmental detriment and/or a Level II Quantitative Assessment indicates there will be an insignificant on air quality, air quality is not an extraordinary circumstance, and the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Further Evaluation Conducted):
This CATEX is too broad as written to entirely exclude air quality issues or exempt General Conformity requirements. Unless the action clearly does not cause an increase in emissions, further evaluation through a *Level II, Quantitative Assessment*, in ACAM or sAIR must be conducted prior to using this CATEX. If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.
Required Documentation (If Clearly No Environmental Detriment):
"Research, investigations, studies, demonstrations or training action causing no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (d)(3) applies for air quality."

Required Documentation (Further Evaluation Conducted):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is

not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(1) and 40 CFR 93.153 (d)(3) apply for air quality."

- **If ACAM/sAIR does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.68 <u>DoW A68-3</u>

"Intermittent on-post training activities (or off post training covered by an ARNG land use agreement) that include, but are not limited to, land navigation, physical training, FAA approved aerial overflights, and small unit level training."

Step 1, No Net Increase Evaluation:
Routine and administrative in nature activities for DAF; therefore, no net increase in emissions. <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.69 <u>DoW A69-4</u>

"Flying activities, to include manned and unmanned aerial vehicle (UAV) flights, and other airspace use activities (for example, missile and projectile flights) in compliance with FAA regulations and in accordance with normal flight patterns and elevations for that facility/installation."

Step 3, De Minimis Action Check:
This CATEX was developed by DAF relying heavily on the expertise, experience, and judgement of DAF professional staff. Additionally, General Conformity requirement can be an "extraordinary circumstance" for actions that will occur within nonattainment and maintenance areas. Based on the verbiage of the CATEX, there is no quantifiable method to determine "flying activities" nor the areal extent of "dispersed over a wide area". Therefore, this CATEX does not address potential extraordinary circumstances associated with air quality impacts. As a result, CATEX DoW A115-33 cannot be applied without addressing criteria pollutant emissions and General Conformity as potential extraordinary circumstances associated with air quality impacts.

All flying activities above 3,000 ft AGL are considered to have a de minimis (insignificant) impact on air quality. Therefore, air quality is not an extraordinary circumstance without further evaluation only if all flying activities are above 3,000 ft AGL. In this case, the <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

All flying activities below 3,000 ft AGL must be further evaluated for potential extraordinary circumstances before this CATEX can possibly be taken.

Required Documentation (<u>All</u> Flight Activity Above 3,000 ft AGL):
"All flight activities will be above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Required Documentation (<u>Any</u> Flight Activity Below 3,000 ft AGL):

- If any flight activities are below 3,000 ft AGL, CATEX may **<u>ONLY</u>** be applied if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
    - **If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.70 <u>DoW A70-5</u>

"Infrequent and temporary increases in air operations that do not exceed 50 percent of the typical installation aircraft operations rate or 50 additional operations per day. Repetitive use of this CX may require further analysis to determine there are no significant impacts (REC required)."

Step 3, De Minimis Action Check:
CATEX requires further evaluation before use. See DAF CATEX DoW A114-32 for "De Minimis Action Check" evaluation.

Required Documentation:

- Air quality is only not an extraordinary circumstance without further evaluation (i.e., ACAM or sAIR) if the proposed increase in flight operations/yr (one flight operation = one complete LTO cycle + one complete CP cycle) are below the allowable flight operations for the specific attainment status of the area that the action will occur within (see DAF CATEX DoW A114-32).
    - Documentation is still required. "Flight operations are ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
- If the proposed temporary increase in flight operations/yr (one flight operation = one complete LTO cycle + one complete CP cycle) is over the limiting criteria pollutant's allowable number of flight operations (see DAF CATEX DoW A114-32), air quality is not an extraordinary circumstance/this CATEX may **<u>ONLY</u>** be applied if the ACAM/sAIR assessment (Level II) indicates an insignificant air quality impact.
    - **If ACAM/sAIR assessment indicates an insignificant impact:** Attach the ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

- **If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.71 <u>DoW A71-6</u>

"Operation of small arms ranges on Army lands of approximately 40 acres or less in size, without change to noise contours that would potentially increase noise impacts to sensitive receptors and/or without change to existing SDZs, if operation includes appropriate monitoring for potential off range impacts (for example, under the Operational Range Assessment Program or similar procedures). Small arms ranges typically include weapons that fire conventional ammunition that is .50 caliber or less and hand or launched grenades. Includes operation of existing recreational small arms ranges on installations. (REC required)."

Step 3, De Minimis Action Check:
This CATEX is too vague as written to exclude air quality issues or exempt General Conformity requirements. As such, a *Level II, Quantitative Assessment*, is necessary before using this CATEX. If the Level II assessment results in emissions above the relevant General Conformity thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, air quality appears to be an extraordinary circumstance. If the Level II assessment results in emissions below the relevant General Conformity thresholds in *Table 5-7, DAF Air Quality POC Insignificance Indicators*, the action is considered to have an insignificant impact on air quality and the <u>applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:

- **If the *Level II, Quantitative Assessment*, indicates an insignificant impact:** Attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) apply for air quality."
- **If the *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.72 <u>DoW A72-7</u>

"Routine operation and use of radar, sonar, laser, telemetry, and other systems that make use of the electromagnetic spectrum for detection, tracking, navigation, range-finding, targeting, communications, or other military purposes, within the boundaries of a military installation, boundaries of a DoD real estate lease agreement land holding, and/or existing airspace currently used for military training. Operation must conform to current American National Standards Institute/Institute of Electrical and Electronics Engineers guidelines for maximum permissible exposure to electromagnetic fields (REC required)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.73 DoW A73-8

"Research (basic and applied), testing, other RDT&E, production/repair operations, and manufacturing operations conducted at existing enclosed facilities to include contractor-operated/owned laboratories and other enclosed facilities, consistent with previously established safety levels (REC required if the proposed action involves the use of munitions and explosives of concern or hazardous material and the constituent was not used at the enclosed facility during the preceding 5 years, or if the proposed action is expected to release radiation)."

Partial Step 2, Predetermined PTC Evaluation (Clearly No Environmental Detriment):
As long as no environmental detriment is incurred, and the action is a research, investigation, study, demonstration, or training action, this action meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." Unless the action is a research, investigation, study, demonstration, or training action and clearly does not cause a net increase in emissions, a *Level II, Quantitative Assessment*, is necessary to prove the action will have an insignificant impact on air quality. If the action is a research, investigation, study, demonstration, or training action and clearly does not cause a net increase in emissions or a *Level II, Quantitative Assessment*, demonstrates the action will have an insignificant impact on air quality, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Partial Step 3, De Minimis Action Check (Further Evaluation Needed to Assess Air Quality):
This CATEX is too broad as written to entirely exclude air quality issues or exempt General Conformity requirements. Unless the action is a research, investigation, study, demonstration, or training action and clearly does not cause a net increase in emissions, further evaluation through a *Level II, Quantitative Assessment*, in ACAM or sAIR must be conducted prior to using this CATEX. If the ACAM/sAIR assessment indicates an insignificant impact to air quality, the CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.). If the ACAM/sAIR assessment does not indicate an insignificant impact to air quality, air quality appears to be an extraordinary circumstance.

Required Documentation (If Clearly No Environmental Detriment):
"Research, investigations, studies, demonstrations or training action causing no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (d)(3) apply for air quality."

Required Documentation (If Further Evaluation Needed to Assess Air Quality):

- **If ACAM/sAIR indicates an insignificant impact:** Attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(1) and 40 CFR 93.153 (d)(3) apply for air quality."
- **If ACAM/sAIR does <u>not</u> indicate an insignificant impact:** Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed**.

8.74 <u>DoW A74-9</u>

"New research, development, testing, and evaluation activities conducted at established laboratories or manufacturing and maintenance facilities (including contractor-operated laboratories and facilities) of a similar type, nature, and scope as the prior or existing research, development, testing, and evaluation activities on the facility."

Step 2, Predetermined PTC Evaluation:
For air quality, 'similar type, nature, and scope' means equal or lower operational tempo, equipment usage, and emissions profile compared to existing RDT&E activities at the facility. Meets the description of EPA 40 CFR 93.153(d)(3): "Research, investigations, studies, demonstrations, or training (other than those exempted under paragraph 40 CFR 93.153(c)(2) of this section), where no environmental detriment is incurred and/or, the particular action furthers air quality research, as determined by the state agency primarily responsible for the applicable SIP." <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."

8.75 <u>DoW A75-10</u>

"Testing, evaluation, and demonstration of Soldier equipment, to include the operator, maintainer, and supporter, and support facilities, that provide for protection of the Soldier and the delivery of required ammunition, cargo, unit equipment, and shelters. Soldier support activities include the transportability testing of mobile facilities that include evaluation of weight, center of gravity, tilt table, and lane change, initial inspection, safety, weight, rail impact, mobility testing, drop test, and final inspection. Testing also includes evaluation of the Lightweight Chemical-Biological Protection, including collective protection and detection equipment, to determine the durability of the Soldier-worn materials and to gain wearability data, including mock training exercises (REC required)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. <u>CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).</u>

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.76 DoW A76-11

"Testing, evaluation, and demonstration of small scale Army equipment with similar constituents and use as commercially available equipment (for example, backpacks, batteries, radios, flashlights, helmets, clothing, shoes, Global Positioning Systems, containers, test kits, respirators, netting, tents, stretchers, splints, and medical equipment)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.77 DoW A77-12

"Flight testing, evaluation, and demonstration of surface-to-surface, air-to-surface, Surface to-air, and air-to-air rockets, missiles, and medium and large caliber ammunition or artillery-type projectiles where: (i) the projectile launch, flight, landing, and vehicle/payload recovery occurs solely within the boundaries of a military installation or within DoD real estate lease agreement land holdings; (ii) the entire flight from launch to landing occurs over an established range designated for testing of such projectiles; (iii) landing and recovery, when feasible, of boosters, (surface) projectiles, payload, aerial targets and/or related debris occurs within a designated impact area (such as a warhead impact target area); and (iv) recovery operations will be coordinated with explosive ordnance disposal (EOD) personnel to ensure test debris is rendered harmless to human health and safety prior to recovery. This CX does not apply to the testing, evaluation, or demonstration of projectiles with payloads designed to release radiological, nuclear, and high-yield explosives or other types of payloads that could cause significant harm to human health and/or the environment if released (REC required)."

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

8.78 DoW A78-13

"Testing, evaluation, and demonstration of man portable, individual, and crew served weapons systems used principally against personnel and lightly armored targets, to include both ballistic and non-ballistic systems and associated ordnance, munitions, aiming, powering,

storage, training, specialized maintenance equipment, logistic support, and other ancillary items where: (i) the small arms firing occurs solely within the boundaries of a military installation; (ii) the entire firing occurs over an established range designated for testing of small arms; and (iii) landing and recovery, when feasible, of munitions and/or debris occurs within a designated impact area (REC required).”

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

8.79 DoW A79-14

“Testing, evaluation, and demonstration of mortars on military installations including: (i)general support, weapon system testing, production qualifications testing, mortar detection and data acquisition, proof assembly testing, acceptance testing, classification testing, and mortar technology demonstrations; (ii) general support for mortars testing requiring small arms firing, grenade launcher firing, and rocket propelled grenades firing when launch, flight, and impact occur on designated ranges; or (iii) final classification testing, including static functioning of test items in a boxed and stacked configuration when launch, flight, and/or impact/detonation occur on designated ranges (REC required).”

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

8.80 DoW A80-15

“Automotive testing involving testing, evaluation, and demonstration of automotive performance, transportability, reliability, human factors engineering and all applicable human systems integration domains, rail impact, lift and tie-down, tilt table, braking, steering and handling, side slopes, longitudinal slopes, gradeability, acceleration, and standard obstacles. Testing also includes: i. testing mobile equipment which includes weight and center of gravity, tilt table, and lane change; ii. automotive performance tests accomplished in environmental chambers or in existing outdoor testing area, including blowing rain and sand tests and transportability tests (lift provision compression test, helicopter flight, and rail impact); iii. specific automotive testing measuring for weight, center of gravity, and moment of inertia, and tire, track, and suspension dynamic and static properties; iv. testing of automotive trailers for resistance to towing; and v. performance vehicles tested for speed and acceleration, gradeability and side slopes, standard obstacles, transportability, fuel consumption, full load

cooling, environmental performance, ride quality, winching, braking, steering and handling, towing compatibility, human factors, and material handling cranes (REC required).”

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine automotive testing with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

8.81 DoW A81-16

Testing, evaluation, and demonstration of robotic vehicles, to include Unmanned Ground Vehicle (UGV). Testing includes scenarios that: (i) test UGVs and Soldiers individually; (ii)test the interface between UGVs and Soldiers in mounted and dismounted maneuvers on existing test grids and training ranges, including navigation and identification of obstacles, targets, and hazards; (iii) test vehicles on existing test courses and existing improved surfaces; and (iv) test vehicles operating in test chambers while subjected to environmental conditions (REC required).

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

8.82 DoW A82-17

Testing, evaluation, and demonstration of UAV and associated technologies. Testing includes scenarios in which (i) the UAV is: launched, operated, landed, and recovered solely within land boundaries of a military installation or within DoD real estate lease agreement land holdings; (ii) the entire flight from launch to landing occurs over an established range designed for testing of such systems; (iii) the entire flight from launch to landing occurs within DoD controlled airspace; and (iv) landing and recovery of UAVs, and recovery, when feasible, of associated test materials including munitions occurs within a designated test range or impact area (REC required).

Step 1, No Net Increase Evaluation:
Routine activity; therefore, no net increase in emissions. CATEX applies if there is no other environmental impact (e.g., impact to noise, water, natural resources, etc.).

Required Documentation:
“Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply.”

9 SUMMARY

The use of previously implemented actions and simplistic scientific analyses for deriving the original DAF and DA-established CATEXs was a broad assessment across all environmental concerns. Given the lack of standardized emissions estimating guidance and the limited emission estimating methods at the time the DAF and DA-established CATEXs were first derived, the CATEX evaluations for air quality relied heavily on expertise, experience, and judgement of professional staff. Therefore, the original DAF and DA-established CATEXs may not have fully addressed potential extraordinary circumstances associated with air quality impacts.

This CATEX evaluation focused exclusively on potential impacts to air quality from each of the DAF and DA-established CATEXs and reevaluated potential extraordinary circumstances associated with the air quality impacts. The evaluation used the most current DAF standardized guidance for air emissions estimating (i.e., the Air Emissions Guide for Air Force Stationary, Mobile, and Transitory Sources), DAF emissions Insignificance Indicators, and the ACAM.

The tables below summarize the findings and required documentation resulting from the reevaluation (see *Table 9-1, DA CATEX Summary Table*, and *Table 9-2, DAF CATEX Summary Table*):

Table 9-1, DA CATEX Summary Table

CATEX	Further Evaluation Required	Required Documentation
DoW A1-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A2-2	No, PTC	"Emergency response activity; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153(d)(2) and 40 CFR 93.153(e) apply."
DoW A3-3	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A4-4	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A5-5	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A6-6	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A7-7	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A8-8	No, PTC	"Action similar in scope and operation to activities currently being conducted; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(x) applies."
DoW A9-9	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A10-10	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A11-11	No, De Minimis	"DAF open houses and similar events do not pose a significant impact to air quality; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) apply (see 2026 DAF CATEX Evaluation)."
DoW A12-12	No, NNI	"Closure activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A13-13	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A14-14	Yes	Relocation within the Same Facility: "Routine activity with no net increase in emissions; therefore, CATEX applies for air quality and General Conformity does not apply."
		Relocation to Different Facility and Personnel Increase ≤ 4,600 Personnel: "Increase in personnel is insignificant for air quality; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies (see 2026 DAF CATEX Evaluation)."
		Relocation to Different Facility and Personnel Increase > 4,600 Personnel; **ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(1) applies."
		Relocation to Different Facility and Personnel Increase > 4,600 Personnel; **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A15-15	Yes	Currently (June 2026) CATEX is obsolete.

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A16-16	Yes	DAF may adopt and apply CATEXs from non-DoW Federal agencies only in accordance with *Department of War National Environmental Policy Act Implementing Procedures* Part 1.4(c)–(d).
DoW A17-1	Yes	Construction Project ≤ 1,000,000 ft^2: "Construction is < 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed; If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A18-2	Yes	Parking Lot ≤ 10-acres: "Parking lot construction ≤ 10-acres (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
		Parking Lot > 10-acres; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Parking Lot > 10-acres; **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A19-3	Yes	Equipment is Not a Source of Emissions: "Placed equipment is not a source of emissions; therefore, no net increase in emissions, and General Conformity does not apply."
		Equipment is One-for-One In-Kind Replacement: "In-kind replacement action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."
		Equipment is a Source of Emissions and Not an In-Kind Replacement but has an Air Permit: "Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance for CATEX and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) also applies; both apply conditionally on meeting permit requirements."
		Equipment is a Source of Emissions, Not an In-Kind Replacement, and is Without an Air Permit; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance for the CATEX and General Conformity exemption 40 CFR 93.153 (c)(1) also applies."
		Equipment is a Source of Emissions, Not an In-Kind Replacement, and is Without an Air Permit; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> an indicate insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Figure (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A20-4	Yes	Installation of Utility or Communication System: "Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiii) applies."
		Action Similar to FONSI Action: Attach relevant FONSI and state "For air quality, the project/action is obviously equal to or less than in scope, activity, and size; at the same relative location; and still has the same attainment status/severity of the previous FONSI. Additionally, the previous FONSI and the associated ACAM assessment are readily available for public review. Therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(x) applies."
		Installation of Fencing or Safety Equipment $\leq$ 1,000,000 ft^2: "Construction is < 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Installation of Fencing or Safety Equipment > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Installation of Fencing or Safety Equipment > 1,000,000 ft^2; ACAM/sAIR Needed: **If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A21-5	Yes	Relocation within the Same Facility: "Relocation of machinery/equipment in the same facility with no net increase emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
		New Construction, Installation, and/or Different Facility Relocation; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		New Construction, Installation, and/or Different Facility Relocation; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A22-6	No, De Minimis	"Demolition action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A23-7	Yes	***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, indicates an insignificant impact** attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A24-8	Yes	Construction Project $\leq$ 1,000,000 ft^2: "Construction is < 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A25-9	No, PTC or De Minimis	Routine Activity: "Routine activity; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."
		Non-Routine Activity: "Minor addition, modernization, maintenance, and/or sustainment action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
DoW A26-10	Yes	**ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		If ACAM/sAIR does <u>not</u> indicate an insignificant impact: Air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A27-11	Yes	Construction Project ≤ 1,000,000 ft^2: "Construction is ≤ 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact attach ACAM/sAIR assessment** and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A28-12	Yes	Modernization Action: "Minor addition, modernization, maintenance, and/or sustainment action (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Large-Scale Construction Project $\leq$ 1,000,000 ft^2: "Construction is < 1,000,000 ft^2 (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Large-Scale Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact attach ACAM/sAIR assessment** and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Large-Scale Construction Project > 1,000,000 ft^2; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A29-13	No, PTC	"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153(d)(2), 40 CFR 93.153(e), and 40 CFR 93.153 (c)(2)(iv) apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A30-1	Yes	***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, indicates an insignificant impact** attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A31-2	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A32-3	No, PTC	"Environmental study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."
DoW A33-4	No, PTC	"Routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A34-5	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A35-6	No, PTC	"Routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(4) and 40 CFR 93.153 (c)(2)(iv) also apply."
DoW A36-7	Yes	***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, indicates an insignificant impact** attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		***Level II, Quantitative Assessment*, Needed: *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A37-8	Yes	Carrying Out a Conforming Program Consistent with a Land Management Plan: "Land management activity carrying out a conforming program consistent with a land management plan; therefore, air quality is not an extraordinary circumstance, and General Conformity Exemption 40 CFR 93.153(c)(4) applies."
		Prescribed Fire Conducted in Accordance with a Smoke Management Program: "Prescribed fire conducted in accordance with a SMP meeting the requirements of EPA's Interim Air Quality Policy on Wildland and Prescribed Fires or an equivalent replacement EPA policy; therefore, air quality is not an extraordinary circumstance, and General Conformity Exemption 40 CFR 93.153(i)(2) applies."
		***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, indicates an insignificant impact** attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A38-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A39-2	No, PTC	"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) both apply."
DoW A40-3	No, Routine	"Routine/administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A41-4	No, NNI	"Proposed action has no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A42-5	Yes	Non-Polluting Emitting Product: "Non-polluting emitting equipment with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
		Polluting Emitting Equipment; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Polluting Emitting Equipment; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A43-6	No, NNI	"Proposed action has no net increase in emissions; therefore, air quality is not an extraordinary circumstance for CATEX, and General Conformity does not apply."
DoW A44-7	Yes	Non-Pollutant Emitting Product: "Non-polluting emitting equipment with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
		Pollutant Emitting Equipment; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies for air quality."
		Pollutant Emitting Equipment; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A45-8	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A46-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A47-2	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A48-3	No, PTC	"Transfers of administrative control activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xx) applies."
DoW A49-4	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A50-5	Yes	No Change in Land Use: "Transfer of property with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiv) applies."
		Change in Land Use; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Change in Land Use; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A51-6	No, Routine	"Disposal activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A52-7	No, NNI	"Administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A53-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A54-2	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A55-3	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A56-4	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not extraordinary circumstance, and General Conformity does not apply."
DoW A57-5	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A58-6	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A59-7	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A60-8	No, NNI	"Existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A61-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A62-2	No, PTC	"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) and 40 CFR 93.153(e) both apply."
DoW A63-3	No, PTC	"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."
DoW A64-4	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A65-5	No, Routine	"Routine HAZMAT transport with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A66-1	No, Routine	"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A67-2	Yes	Clearly No Environmental Detriment: "Research, investigations, studies, demonstrations or training action causing no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (d)(3) applies for air quality."
		Further Evaluation Needed to Assess Air Quality; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(1) and 40 CFR 93.153 (d)(3) apply for air quality."
		Further Evaluation Needed to Assess Air Quality; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A68-3	No, Routine	"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A69-4	Yes	All Flight Activity Above 3,000 ft AGL: "All flight activities will be above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Any Flight Activity Below 3,000 ft AGL; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Any Flight Activity Below 3,000 ft AGL; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A70-5	Yes	Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) > the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation; *Table 7-2, Number of Allowable Flight Operations/Year*); **ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach the ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) > the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation; *Table 7-2, Number of Allowable Flight Operations/Year*); **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
		Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation) state: "Flight operations are ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A71-6	Yes	***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, indicates an insignificant impact** attach Level II assessment and state "*Level II, Quantitative Assessment*, indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		***Level II, Quantitative Assessment*, Needed: If *Level II, Quantitative Assessment*, does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A72-7	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A73-8	Yes	Clearly No Environmental Detriment: "Research, investigations, studies, demonstrations or training action causing no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (d)(3) apply for air quality."
		Further Evaluation Needed to Assess Air Quality; **ACAM/sAIR Needed: If ACAM/sAIR indicates an insignificant impact** attach ACAM/sAIR assessment and state "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemptions 40 CFR 93.153 (c)(1) and 40 CFR 93.153 (d)(3) apply for air quality."
		Further Evaluation Needed to Assess Air Quality; **ACAM/sAIR Needed: If ACAM/sAIR does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A74-9	No, PTC	"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) both apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A75-10	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A76-11	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A77-12	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A78-13	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A79-14	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A80-15	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A81-16	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-1 DA CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A82-17	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Notes:
NNI = No Net Increase in Emissions
PTC = Presumed to Conform

Table 9-2, DAF CATEX Summary Table

CATEX	Further Evaluation Required	Required Documentation
DoW A83-1	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A84-2	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A85-3	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A86-4	No, Routine and PTC	"Routine administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(vi) both applies."
DoW A87-5	No, Routine and PTC	"Routine rulemaking and policy activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iii) applies."
DoW A88-6	No, Routine and PTC	"Routine rulemaking and policy activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iii) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A89-7	No, Pre-Existing NNI	"Pre-existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A90-8	No, De Minimis	"Construction within the 5-foot line of a building (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A91-9	Yes	Repair: "Repair action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."
		One-for-One In-Kind Replacement: "In-kind replacement action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."
		Not One-for-One In-Kind Replacement but **With Air Permit**: "Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) also applies; both apply conditionally on meeting permit requirements."
		Not One-for-One In-Kind Replacement and **Without Air Permit; ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Not One-for-One In-Kind Replacement and **Without Air Permit; ACAM/sAIR Needed: If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed further.**

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A92-10	No, Routine and PTC	"Routine maintenance and repair activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A93-11	Yes	Non-Construction Project/Action; If the action is "similar to other actions" and "similar setting": For air quality, the project/action is obviously equal to or less than in scope, activity, and size; at the same relative location; and still has the same attainment status/severity of the previous FONSI. Additionally, the previous FONSI and the associated ACAM/sAIR assessment are readily available for public review. Therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(2)(x) applies."
		Non-Construction Project/Action; If the action is NOT "similar to other actions" and "similar setting" **further air quality assessment is required (i.e., ACAM assessment): If the ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Non-Construction Project/Action; If the action is NOT "similar to other actions" and "similar setting" **further air quality assessment is required (i.e., ACAM assessment): If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
		SRM Construction: "Proposed action is routine maintenance and repair activities; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A93-11 (cont.)	Yes	Non-SRM Construction; **ACAM/sAIR Needed: If the ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Non-SRM Construction; **ACAM/sAIR Needed: If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
DoW A94-12	No, Routine and PTC	"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."
DoW A95-13	No, Routine and PTC	"Routine maintenance and repair activity with de minimis net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(iv) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A96-14	Yes	One-for-One In-Kind Replacement: "In-kind replacement action; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies."
		Not One-for-One In-Kind Replacement but **With Permit**: "Replacement action covered under air permitting requirements; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(2)(iv) applies; both apply conditionally on meeting permit requirements."
		Not One-for-One In-Kind Replacement and **Without Permit; ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach the ACAM/sAIR report and specifically state the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Not One-for-One In-Kind Replacement and **Without Permit; ACAM/sAIR Needed: If the ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A97-15	No, Existing Activity NNI	"Downsizing of existing activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A98-16	No, PTC	"No net increase in emissions; therefore, air quality is not extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiv) applies."
DoW A99-17	No, PTC	"Transfers of ownership activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xix) applies."
DoW A100-18	No, PTC	"Transfers of administrative control activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xx) applies."
DoW A101-19	No, PTC	"Lease/license activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xi) applies."
DoW A102-20	No, Routine	"Routine/administrative activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A103-21	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A104-22	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A105-23	No, Routine	"Routine activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity does not apply."
DoW A106-24	No, PTC	"Study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."
DoW A107-25	No, PTC	"Environmental study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."
DoW A108-26	No, PTC	"Environmental restoration study activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(3) applies."
DoW A109-27	No, PTC	"Research activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(d)(3) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A110-28	No, Routine and PTC	"Routine HAZMAT transport with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(vii) both apply."
DoW A111-29	No, PTC	"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) both apply."
DoW A112-30	No, PTC	"Emergency response activity with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(d)(2) applies."
DoW A113-31	No, PTC	"Insignificant increase in aircraft operations with no net increase in emissions; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(2)(xiii) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A114-32	Yes	Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) > the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation; *Table 7-2, Number of Allowable Flight Operations/Year*); **ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach the ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) > the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation; *Table 7-2, Number of Allowable Flight Operations/Year*); **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
		Temporary Increase in Operations (one flight operation = one complete LTO cycle + one complete CP cycle) ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation; *Table 7-2, Number of Allowable Flight Operations/Year*) state: "Flight operations are ≤ the limiting criteria pollutant's allowable number of flight operations (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A115-33	Yes	Flight Activities Above 3,000 ft AGL: "All flight activities will be above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Flight Activities Below 3,000 ft AGL; **ACAM/sAIR Needed: If ACAM/sAIR assessment does <u>not</u> indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**
		Flight Activities Below 3,000 ft AGL; **ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
DoW A116-34	No, PTC	"Aircraft operations above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(xxii) applies for air quality."

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A117-35	No, PTC	"Aircraft operations above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance and General Conformity exemption 40 CFR 93.153(c)(2)(xxii) applies for air quality."
DoW A118-36	Yes	Aircraft Operations Above 3,000 ft AGL: "Aircraft operations are above 3,000 ft AGL; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(1) applies."
		Aircraft Operations Below 3,000 ft AGL and **No Increase in LTO or CP Cycles:** "No increase in LTO or CP cycles; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies."
		Aircraft Operations Below 3,000 ft AGL and **Increase in LTO or CP Cycles**; **ACAM/sAIR Needed: If ACAM/sAIR assessment indicates an insignificant impact** attach ACAM/sAIR report and specifically document the "ACAM/sAIR assessment indicated an insignificant impact; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153(c)(1) applies."
		Aircraft Operations Below 3,000 ft AGL and **Increase in LTO or CP Cycles**; **ACAM/sAIR Needed: If ACAM/sAIR assessment does not indicate an insignificant impact** air quality appears to be an extraordinary circumstance, and the **DAF Air Quality SME (AFCEC/CZPQ) must be contacted to proceed.**

Table 9-2. DAF CATEX Summary Table (cont.)

CATEX	Further Evaluation Required	Required Documentation
DoW A119-37	No, De Minimis	"Fly-overs are ≤ 355 allowable number/year (see 2026 DAF CATEX Evaluation); therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) both applies."
DoW A120-38	No, De Minimis	"DAF open houses and similar events do not pose a significant impact to air quality; therefore, air quality is not an extraordinary circumstance, and General Conformity exemption 40 CFR 93.153 (c)(1) applies (see 2026 DAF CATEX Evaluation)."

Notes:
NNI = No Net Increase in Emissions
PTC = Presumed to Conform

10 GLOSSARY

This section discusses basic terms and definitions used in assessing the air quality impacts from DAF actions.

Air Conformity Applicability Model (ACAM)
The DAF's simplified emission model (product of Solutio Environmental Inc.) that is adequate for a General Conformity Applicability Analysis and a cursory NEPA Assessment for air quality. ACAM and Simulated Air Impact Review (sAIR) must be used throughout the DAF when performing a quantitative estimate of the annual net change in total direct and indirect emissions of pollutants of concern (or their precursors).

Adverse Impact
As it relates to air quality, means to cause or contribute to exceeding one or more NAAQSs. NAAQSs are the maximum amount of a criteria pollutant (or its precursors), averaged over a specified regional area and period of time (year), that can be present in outdoor air without harming public health and the environment. NAAQSs were established at annual emissions rates that are protective of the health of 'sensitive' populations such as asthmatics, children, and the elderly.

Air Quality
A specific military installation subset and type of installation for aircraft operations. A place of operations for military aircraft where military aircraft take off and land.

Applicability Analysis
The first stage of a General Conformity Evaluation is an exemption review and (if needed) quantitative emission net-change analysis used to determine if an action must be supported by a GCR determination.

Air Quality Impact Analysis (AQIA)
DAF's all-in-one air impact assessment that covers both NEPA and General Conformity Rule air quality requirements. The AQIA process is broken into three progressive levels of assessment: *Level I, Exempt Action Screening* (determine if a formal Air Quality Assessment is required); *Level II, Quantitative Air Quality Assessment* (a formal assessment of air impacts); and *Level III, Advanced Air Quality Assessment* (part science and part art, both quantitative and qualitative assessments). These levels are progressively designed to ensure completion of an air quality assessment at the lowest level possible. The levels are independent of the required level of NEPA analysis (e.g., CATEX, EA, or EIS).

Attainment Area
An area that meets NAAQS for all criteria pollutants.

Categorical Exclusion (CATEX)
A category of actions that a Federal agency has determined normally does not significantly affect the quality of the human environment (i.e., the natural and physical environment and the relationship of people with that environment; see NEPA section 102(2)(C)).

Closed Pattern (CP) Cycles
A flight operation consisting of one complete repetitive flight maneuver that involves practice landing on a runway by briefly touching the landing gear to the runway, or coming very close, and transitioning immediately into takeoff/climb out and associated flying to maneuver into another practice landing.

Code of Federal Regulations (CFRs)
The codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

Cooperating Agency
May be any Federal agency that has jurisdiction by law or special expertise with respect to any potential environment impact involved in a proposal for legislation or Federal action that significantly affects the quality of the human environment. A cooperating agency may also be a state or local agency of similar qualifications or, when the effects influence a reservation, an Indian Tribe. By agreement with the lead agency, an Indian Tribe may become a cooperating agency.

Criteria Pollutants
The six pollutants listed in the CAA that are regulated by the EPA through the NAAQS because of their health and/or environmental effects. They are nitrogen oxides (NOx), sulfur oxides (SOx), carbon monoxide (CO), ozone (O_3), particulate matter (PM10 & PM2.5), and lead (Pb). Nitrogen dioxide (NO_2) and sulfur dioxide (SO_2) are used as indicators for NOx and SOx in the ambient (outdoor) air.

De Minimis
Are criteria pollutant (or its precursors) annual emission rates (levels) that are too low to cause or contribute to exceeding one or more NAAQS. NAAQSs are the maximum amount of a criteria pollutant (or its precursors), averaged over a specified regional area and period of time (year), that can be present in outdoor air without harming public health and the environment. Therefore, any action resulting in annual net change emissions (direct and indirect) below the de minimis levels, is considered clearly insignificant to public health and the environment locally, regionally, and cumulatively.

Determination (or GCR Determination)
The second stage of a General Conformity Evaluation (made after an applicability analysis is completed) is an extensive evaluation to ensure a proposed action “conforms” to the applicable SIP and meets all GCR requirements.

Direct Emissions
Emissions caused by or initiated by the implementation and/or operation of an action, and that occur at the same time and place as the action.

Emission Factor
The rate at which pollutants are emitted into the atmosphere by one source or a combination of sources.

Environmental Assessment (EA)
A concise public document that provides sufficient data, evidence, and analysis to determine if a Federal agency should prepare an EIS for an action or issue a FONSI. An EA is not necessary in cases where the Federal agency has decided to prepare an EIS. An EA can be prepared at any time to aid agency decision making.

Environmental Impact Statement (EIS)
A detailed, concise public document required for major Federal actions is likely to have significant effects on the human environment. The document may be directly prepared, without first doing an EA, if the action will have significant environmental impacts. An EIS provides the public and decision makers with clear, written documentation of potential significant environmental effects of the proposed action, and reasonable alternatives including the no action alternative.

Environmental Resources/Media
Resource categories in the human environment (e.g., air, water, noise, flora, fauna, historic sites, etc.) that are affected or can potentially be affected by a proposed action and any alternatives.

EPA
U.S. Environmental Protection Agency.

Extraordinary Circumstances
Factors or circumstances that indicate a normally categorically excluded action may have a reasonably foreseeable significant adverse effect in accordance with *DoW NEPA Procedures Part 1.4(d)(1)*.

Facility
A specific installation subset and type of installation located within the State which is owned or operated by the federal government, and which is used for the purposes of providing logistical, technical, material, training, and any other support to any branch of the United States military.

Finding of No Significant Impact (FONSI)
A document which briefly presents evidence of why a Federal agency has determined that a proposed action, not otherwise categorically excluded, will not have a significant impact on the environment. The FONSI justifies why the preparation of an EIS is unnecessary. The FONSI must include the EA or be attached to the EA, or a summary of it, and reference any other associated environmental documents. The FONSI should state all mitigation that will be undertaken, if any.

Human Environment
Comprehensively the natural and physical environment and the relationship of Americans with that environment.

Indirect Emissions
Emissions caused by the implementation and/or operation of an action, are reasonably foreseeable, but which occur later in time and/or are farther removed in distance from the action itself. Under General Conformity, indirect emissions are further limited to those indirect emissions that the responsible Federal agency can "practicably control and will maintain control over due to a continuing program responsibility of the Federal agency."

Insignificance Indicators
EPA thresholds that are partially applied or applied out of context to their intended use; however, they provide an indication of potential impacts or air quality significance. Therefore, indicators do not trigger a regulatory requirement; however, they provide a warning that the action is potentially approaching a threshold which would trigger regulatory requirement. It is important to note that while significance thresholds provide a definitive impact determination, insignificance indicators only provide a clue and evidence to the potential significance of emissions impacts to air quality.

Installation
Any property (installation, base, facility, camp, post, station, yard, center, or other activity) under the jurisdiction of the Secretary of a military department or, in the case of an activity in a foreign country, under the operational control of the Secretary of a military department or the Secretary of Defense, without regard to the duration of operational control.

Landing and Take Off (LTO) Cycle
A flight operation consisting of one complete repetitive takeoff and landing cycle.

Maintenance Area (MA)
Any geographic area of the United States and territories previously designated nonattainment pursuant the CAA Amendments of 1990 and subsequently re-designated to attainment.

Modernization
May include either repair or construction work. Includes the alteration of facilities or components solely to implement new or higher standards (including regulatory changes) or to accommodate new functions. Includes work associated with functional conversion and work classified as construction.

National Ambient Air Quality Standard (NAAQS)
Air Quality standards established by the EPA under the Clean Air Act to protect human health (primary standards) and to protect property and aesthetics (secondary standards). Primary NAAQSs were established at annual emissions rates that are protective of the health of 'sensitive' populations such as asthmatics, children, and the elderly. These standards set the maximum allowable concentration of a specific criteria pollutant in the outdoor ambient air. NAAQS are specified for different averaging times (e.g., 1-hour, 8-hour, annual) and are measured in units of concentration, such as parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$)

National Environmental Policy Act (NEPA)
An Act established to declare a national policy that will encourage productive and enjoyable

harmony between society and the environment; to promote efforts that will prevent or eliminate damage to the environment and the biosphere and stimulate the health and welfare of man; and to enrich the understanding of the ecological systems and natural resources important to the nation.

Net Change Emissions Analysis
An inventory of "effects or impacts" associated with the action under analysis which only includes the emission sources/activity that will add to or reduce direct or indirect emissions (i.e., net change) that are caused by the action.

Nonattainment Area (NAA)
Any geographic area of the United States or its territories that is in violation of any NAAQS and therefore has been designated as nonattainment under the CAA.

Pollutant(s) of Concern (POC)
Under an AQIA, the air pollutant(s) of concern include all criteria pollutant, greenhouse gases, and total hazardous air pollutants (HAPs). Under General Conformity the air pollutant(s) of concern include only emissions of those criteria pollutants and their precursors for which the area is designated nonattainment or maintenance. Additionally, any pollutant emissions from permitted sources are not included as pollutant(s) of concern for General Conformity analysis.

Reasonably Foreseeable
A guiding principle under NEPA and General Conformity. Reasonably foreseeable means sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision. Therefore, only emission sources that a normal person would take into account in reaching an impact decision should be considered.

Record of Environmental Consideration (REC)
The Army's signed statement submitted with project documentation that briefly documents that an Army action has received environmental review. RECs are prepared for CATEXs that require them, and for actions covered by existing or previous NEPA documentation. A REC briefly describes the proposed action and timeframe, identifies the proponent and approving official(s), and clearly shows how an action qualifies for a CATEX, or is already covered in an existing EA or EIS. When used to support a CATEX, the REC must address the use of screening criteria to ensure that no extraordinary circumstances or situations exist. A REC has no prescribed format, as long as the above information is included. To reduce paperwork, a REC can reference such documents as real estate Environmental Baseline Studies (EBSs) and other documents, as long as they are readily available for review. While a REC may document compliance with the requirements of NEPA, it does not fulfill the requirements of other environmental laws and regulations.

Restoration
Includes repair and replacement work to restore facilities collaterally damaged due to inadequately sustained components, premature aging, natural disaster, fire, accident or other causes. This is considered non-life cycle repair of real property.

Routine Actions
Activities relating to the normal and frequent conduct of the DAF (or suborganization) mission. Because they are the regular (usual) course of procedure (i.e., activity) for organization's established mission, they do not involve any NEW direct or indirect emission sources. Given there are no new emissions sources involved, there cannot be any net change in emissions. Therefore, "routine actions" will not have an effect to air quality under NEPA and are automatically considered not an extraordinary circumstance for air quality. Note that while special and community relations events (e.g., open houses, town halls, air shows, athletic events, Earth Day) are routine DAF activities, they are infrequent and may involve new (additional) emission sources; therefore, they are NOT routine actions (normal and frequent mission conduct).

Simulated Air Impact Review (sAIR)
Solutio Environmental's simplified emission model that is adequate for a General Conformity Applicability Analysis and cursory NEPA Assessment for air quality. sAIR and the Air Conformity Applicability Model (ACAM) must be used throughout the DAF when performing a quantitative estimate of the annual net change in total direct and indirect emissions of pollutants of concern (or their precursors).

Solely Administrative Actions
Activities relating to the management of DAF (such as maintaining information files and processing paperwork) and does not involve any direct or indirect emission sources. Given there are no emissions sources involved, there cannot be any net change in emissions. Therefore, "solely administrative actions" will not have an effect to air quality under NEPA and are automatically considered not an extraordinary circumstance for air quality.

Sustainment
Includes resources for cyclical maintenance and scheduled repair activities to maintain the inventory of real property assets through its expected life. It includes regularly scheduled adjustments and inspections, preventive maintenance tasks, and emergency response and service calls for minor repairs. It also includes major repairs or replacement of facility components (usually accomplished by contract) expected to occur periodically throughout the facility life cycle. This work includes regular roof replacement, refinishing of wall surfaces, repairing and replacement of heating and cooling systems, replacing tile carpeting, and similar type work. Sustainment does not include restoration, modernization, environmental compliance, historical preservation, or costs related to unexpected events, funded elsewhere.

11 REFERENCES

40 CFR 93, "Title 40-Protection of the Environment, Chapter I-Environmental Protection Agency, Subchapter C-Air Programs, Part 93-Determining Conformity of Federal Actions to State or Federal Implementation Plans," U.S. Environmental Protection Agency

40 CFR 93, "Code of Federal Regulations, Title 40: Protection of the Environment, Chapter 1: Environmental Protection Agency, Subpart B: Air Programs, Part 93: Determining Conformity of Federal Actions to State or Federal Implementation Plans, Subpart B: Determining Conformity of General Federal Actions to State or Federal Implementation Plans," U.S. Environmental Protection Agency

AFCEC 2023, "Level II, Air Quality Quantitative Assessment, Insignificance Indicators," Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), April 2023

AFCEC 2026a, "Air Emissions Guide for DAF Mobile Sources," Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), June 2025

AFCEC 2026b, "Air Emissions Guide for DAF Transitory Sources," Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), June 2025

AFCEC 2026c, "Air Emissions Guide for DAF Stationary Sources," Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), June 2025

AFCEC 2026d, "DAF Air Quality Impacts Analysis (AQIA) Guide - Fundamentals," Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), March 2026

Council on Environmental Quality (CEQ) 2026, "Establishing, Revising, Adopting, and Applying Categorical Exclusions Under the National Environmental Policy Act", April 9, 2026

DAFI 32-1020, "Department of The Air Force Instruction 32-1020 Planning and Programming Built Infrastructure Projects", U.S. Department of Defense, U.S. Air Force, January 23, 2026

Department of War (DoW) 2026, "Department of War National Environmental Policy Act Implementing Procedures", U.S. Department of War, September 3, 2026

National Environmental Policy Act of 1969, 42 U.S.C. § *4321 et seq.*

Solutio 2025, "Representative Time-In-Mode and Closed Patterns Cycles", Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), September 2025

Solutio 2026a, "Categorical Exclusion DoW A114-32 Revalidation for Air Quality", Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), September 2026

Solutio 2026b, “Categorical Exclusion DoW A119-37 Revalidation for Air Quality”, Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), September 2026

Solutio 2026c, “Categorical Exclusion DoW A120-38 Revalidation for Air Quality”, Solutio Environmental Inc. (AFCEC/CZPQ Support Contractor), September 2026

Attachment A: Worst-Case 5ft Line Construction ACAM Analysis

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

Report generated with ACAM version: 5.0.24a

a. Action Location:

Base: Generic
State:
County(s):
Regulatory Area(s):

b. Action Title: CATEX DoW A90-8 Revalidation (Pentagon)

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2026

e. Action Description:

General Assumptions:
-- Assumed building was extended on all sides up to 5 ft.
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
-- Assumed a DAF average building height of 10ft
-- 1 year total construction project duration chosen as worst-case scenario
--Area of existing building assumed to be 6500000 ft^2
--- 6500000 ft^2 taken from the pentagon having 6500000 ft^2 of office space
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

f. Point of Contact:

Name:
Title:
Organization:
Email:
Phone Number:

2. Analysis: Total reasonably foreseeable net change in direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" (highest annual emissions) and "steady state" (no net gain/loss in emission stabilized and the action is fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

All emissions estimates were derived from various sources using the methods, algorithms, and emission factors from the most current *Air Emissions Guide for Air Force Stationary Sources*, *Air Emissions Guide for Air Force Mobile Sources*, and/or *Air Emissions Guide for Air Force Transitory Sources*. For greater details of this analysis, refer to the Detail ACAM Report.

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

____ applicable
_X_ not applicable

Conformity Analysis Summary:

2026

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	0.618	10	No
NOx	1.197	10	No
CO	1.577	100	No
SOx	0.003	100	No
PM 10	1.288	70	No
PM 2.5	0.040	70	No
Pb	0.000	25	No
NH3	0.005	70	No

2027 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	0.000	10	No
NOx	0.000	10	No
CO	0.000	100	No
SOx	0.000	100	No
PM 10	0.000	70	No
PM 2.5	0.000	70	No
Pb	0.000	25	No
NH3	0.000	70	No

The Criteria Pollutants (or their precursors) with a General Conformity threshold listed in the table above are pollutants within one or more designated nonattainment or maintenance area/s for the associated National Ambient Air Quality Standard (NAAQS). These pollutants are driving this GCR Applicability Analysis. Pollutants exceeding the GCR thresholds must be further evaluated potentially through a GCR Determination.

The pollutants without a General Conformity threshold are pollutants only within areas designated attainment for the associated NAAQS. These pollutants have an insignificance indicator for VOC, NOx, CO, SOx, PM 10, PM 2.5, and NH3 of 250 ton/yr (Prevention of Significant Deterioration major source threshold) and 25 ton/yr for Pb (GCR de minimis value). Pollutants below their insignificance indicators are at rates so insignificant that they will not cause or contribute to an exceedance of one or more NAAQSs. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Refer to the *Level II, Air Quality Quantitative Assessment Insignificance Indicators* for further details.

None of the annual net change in estimated emissions associated with this action are above the GCR threshold values established at 40 CFR 93.153 (b); therefore, the proposed Action has an insignificant impact on Air Quality and a General Conformity Determination is not applicable.

Name, Title **Date**

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location
Base: Generic
State:
County(s):
Regulatory Area(s):

- Action Title: CATEX DoW A90-8 Revalidation (Pentagon)

- Project Number/s (if applicable):

- Projected Action Start Date: 1 / 2026

- Action Purpose and Need:
Regrettably, large construction activities can potentially produce a lot of air emissions that could be a health hazard. CATEX DoW A90-8 Revalidation "Performing interior and exterior construction within the 5-foot line of a building without changing the land use of the existing building" needs further analysis in order to validate its use for the Department of the Air Force (DAF). As such, the worst-case construction project that can be performed within the 5-foot line of a building was analyzed with all assumptions listed below.

- Action Description:
General Assumptions:
-- Assumed building was extended on all sides up to 5 ft.
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
-- Assumed a DAF average building height of 10ft
-- 1 year total construction project duration chosen as worst-case scenario
--Area of existing building assumed to be 6500000 ft^2
--- 6500000 ft^2 taken from the pentagon having 6500000 ft^2 of office space
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

- Point of Contact
Name:
Title:
Organization:
Email:
Phone Number:

Report generated with ACAM version: 5.0.24a

- Activity List:

Activity Type		Activity Title
2.	Construction / Demolition	CATEX DoW A90-8

Emission factors and air emission estimating methods come from the United States Air Force's Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and Air Emissions Guide for Air Force Transitory Sources.

2. Construction / Demolition

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.1 General Information & Timeline Assumptions

- Activity Location
County:
Regulatory Area(s):

- Activity Title: CATEX DoW A90-8

- Activity Description:
General Assumptions
-- Area of building assumed to be 6500000 ft^2
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Demolition Assumptions
-- Assumed all 4 walls of existing building are demolished
-- Assumed 5% of total construction project duration is spent in demolition

Site Grading Assumptions
-- Assumed reasonably forseeable worst case is to grade 10ft beyond building on every side
-- Assumed 50% of trench volume during site grading will be hauled on-site and off-site
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Site grading trench depth assumed to be 1ft
-- Assumed 5% of total construction project duration is spent in site grading

Excavating/Trenching Assumptions
-- Assumed 3 trenches will be made in the excavating/trenching phase
--- 1 trench for water utility, 1 trench for sewer utility, and 1 trench for electrical utility
-- Assumed each trench will be 1ft wide
-- Trenches for excavation/trenching assumed to be 5ft deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching
--Assumed 5% of total construction project duration is spent in excavation/trenching

Building Construction Assumptions
-- Assumed to be a non-residential building
-- Assumed 75% of total construction project duration is spent in building construction phase

Architectural Coating Assumptions
-- Assumed to be a non-residential building
-- Assumed 75% of total surface area will be coated
-- Assumed 5% of total construction project duration is spent in architectural coating phase

Paving Asphalt Assumptions
-- Assumed entire area of new construction will be paved
-- Assumed 5% of total construction project duration is spent paving

- Activity Start Date
Start Month: 1
Start Month: 2026

- Activity End Date
Indefinite: False
End Month: 12
End Month: 2026

- Activity Emissions:

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

Pollutant	Total Emissions (TONs)
VOC	0.618060
SO_x	0.002730
NO_x	1.196639
CO	1.576702

Pollutant	Total Emissions (TONs)
PM 10	1.287911
PM 2.5	0.039535
Pb	0.000000
NH_3	0.004737

- Global Scale Activity Emissions of Greenhouse Gasses:

Pollutant	Total Emissions (TONs)
CH_4	0.010937
N_2O	0.008005

Pollutant	Total Emissions (TONs)
CO_2	295.966136
CO_2e	298.393680

2.1 Demolition Phase

2.1.1 Demolition Phase Timeline Assumptions

- Phase Start Date
Start Month: 1
Start Quarter: 1
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.1.2 Demolition Phase Assumptions

- General Demolition Information
Area of Building to be demolished (ft^2): 10817
Height of Building to be demolished (ft): 10

- Default Settings Used: Yes

- Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Concrete/Industrial Saws Composite	1	8
Rubber Tired Dozers Composite	1	1
Tractors/Loaders/Backhoes Composite	2	6

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC

POVs	50.00	50.00	0	0	0	0	0

2.1.3 Demolition Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Concrete/Industrial Saws Composite [HP: 33] [LF: 0.73]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.41257	0.00743	3.52633	4.31513	0.08509	0.07828
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.35280	0.00491	3.22260	2.72624	0.14205	0.13069
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Concrete/Industrial Saws Composite [HP: 33] [LF: 0.73]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02330	0.00466	574.35707	576.32812
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02160	0.00432	532.54993	534.37751
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**	**NH_3**
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	**N_2O**	**CO_2**	**CO_2e**
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.1.4 Demolition Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (0.00042 * BA * BH) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
0.00042: Emission Factor (lb/ft^3)
BA: Area of Building to be demolished (ft^2)

BH: Height of Building to be demolished (ft)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = BA * BH * (1 / 27) * 0.25 * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
BA: Area of Building being demolish (ft^2)
BH: Height of Building being demolish (ft)
(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
0.25: Volume reduction factor (material reduced by 75% to account for air space)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

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2.2 Site Grading Phase

2.2.1 Site Grading Phase Timeline Assumptions

- Phase Start Date
Start Month: 1
Start Quarter: 3
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.2.2 Site Grading Phase Assumptions

- General Site Grading Information
Area of Site to be Graded (ft^2): 163150
Amount of Material to be Hauled On-Site (yd^3): 3022
Amount of Material to be Hauled Off-Site (yd^3): 3022

- Site Grading Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Graders Composite	1	8
Other Construction Equipment Composite	1	8
Rubber Tired Dozers Composite	1	8
Tractors/Loaders/Backhoes Composite	2	7

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.2.3 Site Grading Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Graders Composite [HP: 148] [LF: 0.41]						
	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.31292	0.00490	2.52757	3.39734	0.14041	0.12918
Other Construction Equipment Composite [HP: 82] [LF: 0.42]						

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.28160	0.00487	2.73375	3.50416	0.15811	0.14546
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.35280	0.00491	3.22260	2.72624	0.14205	0.13069
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Graders Composite [HP: 148] [LF: 0.41]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02153	0.00431	530.81500	532.63663
Other Construction Equipment Composite [HP: 82] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02140	0.00428	527.54121	529.35159
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02160	0.00432	532.54993	534.37751
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.2.4 Site Grading Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)
WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase
$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.3 Trenching/Excavating Phase

2.3.1 Trenching / Excavating Phase Timeline Assumptions

- Phase Start Date

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Start Month: 2
Start Quarter: 1
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.3.2 Trenching / Excavating Phase Assumptions

- General Trenching/Excavating Information
Area of Site to be Trenched/Excavated (ft^2): 43331
Amount of Material to be Hauled On-Site (yd^3): 8025
Amount of Material to be Hauled Off-Site (yd^3): 8025

- Trenching Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	2	8
Other General Industrial Equipmen Composite	1	8
Tractors/Loaders/Backhoes Composite	1	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.3.3 Trenching / Excavating Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.39317	0.00542	3.40690	4.22083	0.09860	0.09071
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.45335	0.00542	3.58824	4.59368	0.11309	0.10404
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	N_2O	CO_2	CO_2e
Emission Factors	0.02381	0.00476	587.02896	589.04350
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]				
	CH_4	N_2O	CO_2	CO_2e
Emission Factors	0.02385	0.00477	587.87714	589.89459
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	N_2O	CO_2	CO_2e
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.3.4 Trenching / Excavating Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)
WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.4 Building Construction Phase

2.4.1 Building Construction Phase Timeline Assumptions

- Phase Start Date

Start Month: 2
Start Quarter: 3
Start Year: 2026

- Phase Duration

Number of Month: 9
Number of Days: 4

2.4.2 Building Construction Phase Assumptions

- General Building Construction Information

Building Category: Office or Industrial
Area of Building (ft^2): 54184

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Height of Building (ft): 10
Number of Units: N/A

- Building Construction Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Cranes Composite	1	6
Forklifts Composite	2	6
Generator Sets Composite	1	8
Tractors/Loaders/Backhoes Composite	1	8
Welders Composite	3	8

- Vehicle Exhaust
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

- Vendor Trips
Average Vendor Round Trip Commute (mile): 40 (default)

- Vendor Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

2.4.3 Building Construction Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Cranes Composite [HP: 367] [LF: 0.29]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.19758	0.00487	1.83652	1.63713	0.07527	0.06925
Forklifts Composite [HP: 82] [LF: 0.2]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.24594	0.00487	2.34179	3.57902	0.11182	0.10287
Generator Sets Composite [HP: 14] [LF: 0.74]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.53947	0.00793	4.32399	2.85973	0.17412	0.16019
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839
Welders Composite [HP: 46] [LF: 0.45]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**

Emission Factors	0.46472	0.00735	3.57020	4.49314	0.09550	0.08786

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Cranes Composite [HP: 367] [LF: 0.29]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02140	0.00428	527.46069	529.27080
Forklifts Composite [HP: 82] [LF: 0.2]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02138	0.00428	527.09717	528.90603
Generator Sets Composite [HP: 14] [LF: 0.74]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02305	0.00461	568.32694	570.27730
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468
Welders Composite [HP: 46] [LF: 0.45]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02305	0.00461	568.29068	570.24091

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**	**NH_3**
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	**N_2O**	**CO_2**	**CO_2e**
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.4.4 Building Construction Phase Formula(s)

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = BA * BH * (0.42 / 1000) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
BA: Area of Building (ft^2)
BH: Height of Building (ft)
(0.42 / 1000): Conversion Factor ft^3 to trips (0.42 trip / 1000 ft^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Vender Trips Emissions per Phase

$VMT_{VT} = BA * BH * (0.38 / 1000) * HT$

VMT_{VT}: Vender Trips Vehicle Miles Travel (miles)
BA: Area of Building (ft^2)
BH: Height of Building (ft)
(0.38 / 1000): Conversion Factor ft^3 to trips (0.38 trip / 1000 ft^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VT}: Vender Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.5 Architectural Coatings Phase

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.5.1 Architectural Coatings Phase Timeline Assumptions

- Phase Start Date
Start Month: 11
Start Quarter: 4
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.5.2 Architectural Coatings Phase Assumptions

- General Architectural Coatings Information
Building Category: Non-Residential
Total Square Footage (ft^2): 40638
Number of Units: N/A

- Architectural Coatings Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.5.3 Architectural Coatings Phase Emission Factor(s)

- Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.5.4 Architectural Coatings Phase Formula(s)

- Worker Trips Emissions per Phase
$VMT_{WT} = (1 * WT * PA) / 800$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
1: Conversion Factor man days to trips (1 trip / 1 man * day)
WT: Average Worker Round Trip Commute (mile)
PA: Paint Area (ft^2)
800: Conversion Factor square feet to man days (1 ft^2 / 1 man * day)

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Off-Gassing Emissions per Phase
$VOC_{AC} = (AB * 2.0 * 0.0116) / 2000.0$

VOC_{AC}: Architectural Coating VOC Emissions (TONs)
BA: Area of Building (ft^2)
2.0: Conversion Factor total area to coated area (2.0 ft^2 coated area / total area)
0.0116: Emission Factor (lb/ft^2)
2000: Conversion Factor pounds to tons

2.6 Paving Phase

2.6.1 Paving Phase Timeline Assumptions

- Phase Start Date
Start Month: 12
Start Quarter: 2
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.6.2 Paving Phase Assumptions

- General Paving Information
Paving Area (ft^2): 54184

- Paving Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Cement and Mortar Mixers Composite	4	6
Pavers Composite	1	7
Paving Equipment Composite	1	8

Rollers Composite	1	7
Tractors/Loaders/Backhoes Composite	1	7

- Vehicle Exhaust

Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips

Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.6.3 Paving Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Cement and Mortar Mixers Composite [HP: 10] [LF: 0.56]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.55280	0.00854	4.19778	3.25481	0.16332	0.15025
Pavers Composite [HP: 81] [LF: 0.42]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.23717	0.00486	2.53335	3.43109	0.12904	0.11872
Paving Equipment Composite [HP: 89] [LF: 0.36]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18995	0.00487	2.06537	3.40278	0.08031	0.07388
Rollers Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.54202	0.00541	3.61396	4.09268	0.15387	0.14156
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Cement and Mortar Mixers Composite [HP: 10] [LF: 0.56]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02313	0.00463	570.16326	572.11992
Pavers Composite [HP: 81] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02133	0.00427	525.80405	527.60847
Paving Equipment Composite [HP: 89] [LF: 0.36]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02141	0.00428	527.70636	529.51732
Rollers Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	586.91372	588.92786
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
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LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.6.4 Paving Phase Formula(s)

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * EF_{POL}) / 2000$

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = PA * 0.25 * (1 / 27) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
PA: Paving Area (ft^2)
0.25: Thickness of Paving Area (ft)
(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)

2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Off-Gassing Emissions per Phase

$VOC_P = (2.62 * PA) / 43560 / 2000$

VOC_P: Paving VOC Emissions (TONs)
2.62: Emission Factor (lb/acre)
PA: Paving Area (ft^2)
43560: Conversion Factor square feet to acre (43560 ft2 / acre)^2 / acre)
2000: Conversion Factor square pounds to TONs (2000 lb / TON)

General Assumptions

L x W = Area

-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehic **2W X W = Area**

-- Constructing a one-story building would result in the greatest travel distances and; therefore, the greatest emissions scenario **$2W^2$ = Area**

-- Assumed DAF average building height of 10 ft **W = SQRT(Area/2)**

-- 1 Year selected as worst-case total construction project duration

Pentagon is 6.5 Million sqft

W = 1802.776 ft

Existing Building Dimensions		
W (ft)	Ratio (L:W)	L (ft)
1802.775638	2	3605.551275

-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Equation 1:

$$L = 2W$$

Where:

L	= Length of the existing building (ft)
2	= Existing building length to width ratio
W	= Width of the existing building (ft)

Demolition

Notes:
-- Height of building assumed to be 10ft
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)
--- Equipment

Area to be Demolished (ft^2)					
# of Walls Width of Building	# of Walls Length of Building	$Wall_{Width}$ (ft)	L (ft)	W (ft)	$Area_{Demo}$ (ft^2)
2	2	1	3605.551275	1802.775638	10816.65383

Notes:
-- Assumed all 4 exterior walls are demolished
-- Assumed exterior walls are 1ft wide

Equation 2:

$$Area_{Demo} = (2 \times Wall_{Width} \times L) + (2 \times Wall_{Width} \times W)$$

Where:

$Area_{Demo}$	= Area of the site to be demolished (ft^2)
2	= Number of walls running the length of the building and the number of walls running the width of the building
$Wall_{Width}$	= Width of wall (ft)
L	= Length of the existing building (ft)
W	= Width of the existing building (ft)

Demolition Phase Duration (day)		
$\%_{Demo}$	$Duration_{Proj}$ (day)	$Duration_{Demo}$ (day)
5%	365	18.25

Notes:
-- $\%_{Demo}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 3:

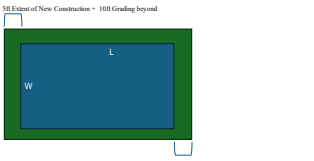
$$Duration_{Demo} = \%_{Demo} \times Duration_{Proj}$$

Where:

$Duration_{Demo}$	= Duration of demolition phase (day)
$\%_{Demo}$	= Percent of total project duration spent in demolition phase (%)
$Duration_{Proj}$	= Duration of total project (day)

Site Grading

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker round trip commute (mile)
--- Equipment



Area to be Graded (ft^2)					
L (ft)	W (ft)	Extent of New Construction (ft)	Worst-Case Grading Beyond New Construction (ft)	Grading Outside Existing Building (ft)	$Area_{Graded}$ (ft^2)
3605.551275	1802.775638	10	20	30	163149.8074

Notes:
-- CATEX DoW A90-8 specifies construction within 5ft line of the building
-- Assumed reasonably foreseeable worst case is to grade 10ft beyond new construction on all sides
-- Grading outside exsting building = (10ft Extent of New Construction+ 20 ft Reasonable Worst Case Grading Beyond New Construction) = 30ft grading outside existing building

Equation 4:

$$Area_{Graded} = [(W + 30) \times (L + 30)] - (W \times L)$$

Where:

$Area_{Graded}$	= Area of the site to be graded (ft^2)
W	= Width of the existing building (ft)
30	= Grading outside existing building (ft)
L	= Length of the existing building (ft)

Site Grading Material Hauled On-Site and Off-Site (ft^3)					
$Area_{Graded}$ (ft^2)	$\%_{GV}$	$Depth_{Graded}$ (ft)	Cubic Feet per Cubic Yard	$Hauled_{Graded}$ On-Site (yd^3)	$Hauled_{Graded}$ Off-Site (yd^3)
163149.8074	50%	1	27	3021.29273	3021.29273

Notes:
-- Assumed 50% of volume during site grading will be hauled on-site and off-site
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Site grading trench depth assumed to be 1ft

Equation 5:

$$Hauled_{Graded} = \frac{Area_{Graded} \times \%_{GV} \times Depth_{Graded}}{27}$$

Where:

$Hauled_{Graded}$	= Volume of material hauled on-site/off-site during site grading phase (ft^3)
$Area_{Graded}$	= Area of the site to be graded (ft^2)
$\%_{GV}$	= % of trench volume during site grading that will be hauled on-site and off-site during site grading (%)
$Depth_{Graded}$	= Depth of site graded (ft)
27	= Cubic feet to cubic yard conversion (1 cubic yard = 27 cubic foot)

Site Grading Phase Duration (day)		
$\%_{Grade}$	$Duration_{Proj}$ (day)	$Duration_{Grade}$ (day)
5%	365	18.25

Notes:
-- $\%_{Grade}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 6:

$$Duration_{Graded} = \%_{Graded} \times Duration_{Proj}$$

Where:

$Duration_{Graded}$	= Duration of site grading phase (day)
$\%_{Graded}$	= Percent of total project duration spent in site grading phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

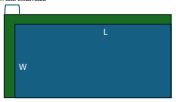
Excavating/Trenching

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Hauling capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)
--- Equipment

Excavated Area (ft^2)				
$Width_{Excavated}$ (ft)	L (ft)	W (ft)	Extent of New Construction (ft)	$Area_{Excavated}$ (ft^2)
3	3605.551275	1802.775638	5	43330.61531

Notes:
-- Assumed 3 trenches will be made in the excavating/trenching phase
--- 1 trench for water utilities, 1 trench for sewer utilities, and 1 trench for electrical utilities
-- Assumed each trench will be 1ft wide
-- CATEX DoW A90-8 specifies construction within 5ft line of the building

5 ft + Width Excavated



Equation 7:

$$Area_{Excavated} = (W + 5 + Width_{Excavated}) \times (L + 5 + Width_{Excavated}) - (W \times L)$$

Where:

$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
W	= Width of the existing building (ft)
5	= Extent of new construction on the sides of the existing building (ft)
$Width_{Excavated}$	= Duration of toal progect (day)
L	= Length of the existing building (ft)

Excavating Material Hauled On-Site and Off-Site (ft^3)				
$Area_{Excavated}$ (ft^2)	$Depth_{Excavated}$	Cubic Feet per Cubic Yard	$Hauling_{Excavated}$ On-Site (ft^3)	$Hauling_{Excavated}$ Off-Site (ft^3)
43330.61531	5	27	8024.18802	8024.18802

Notes:
-- Note trenches for excavation are assumed to be 5 feet deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching

Equation 8:

$$Hauling_{Excavated} = \frac{Area_{Excavated} \times Depth_{Excavated}}{27}$$

Where:

$Hauling_{Excavated}$	= Volume of material hauled on-site/off-site during excavating phase (ft^3)
$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
$Depth_{Excavated}$	= Depth of trecnhes created during excavation/trenching site phases (ft)

Excavation Phase Duration (day)		
$\%_{Excavated}$	$Duration_{Proj}$ (day)	$Duration_{Excavated}$ (day)
5%	365	18.25

Notes:
-- $\%_{Excavated}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 9:

$$Duration_{Excavated} = \%_{Excavated} \times Duration_{Proj}$$

Where:

$Duration_{Excavated}$	= Duration of excavation phase (day)
$\%_{Excavated}$	= Percent of total project duration spent in excavation phase (%)
$Duration_{Days}$	= Duration of toal project (day)

Building Construction

Notes:
-- Building category: Non-residential
-- Building height = 10 ft
-- Default ACAM values for:
--- Average work days per week (day)
--- Hauling capacity (yd^3)
--- Worker commute (mile)
--- Equipment
--- Average hauling truck round trip commute (mile)
--- Average hauling roundtrip commute (mile)
--- Average vendor round trip commute (mile)

Area of New Construction (ft^2)			
L (ft)	W (ft)	Extent of New Construction (ft)	$Area_{Construction}$ (ft^2)
3605.551275	1802.775638	10	54183.26913

Notes:
-- CATEX DoW A90-8 specifies construction within 5ft line of the building

Equation 9:

$$Area_{Costruction} = [(W + 10) \times (L + 10)] - (W \times L)$$

Where:

$Area_{Construction}$	= Area of the site to be graded (ft^2)
W	= Width of building (ft)
10	= Extent of new construction on the sides of the existing building (ft)
L	= Length of the building (ft)

Construction Phase Duration (day)		
$\%_{Construction}$	$Duration_{Proj}$ (day)	$Duration_{Construction}$ (day)
75%	365	273.75

Notes:
-- $\%_{Construction}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 10:

$$Duration_{Construction} = \%_{Construction} \times Duration_{Proj}$$

Where:

$Duration_{Construction}$	= Duration of construction phase (day)
$\%_{Construction}$	= Percent of total project duration spent in construction phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Architectutal Coatings

Notes:
-- Building category: Non-residential
-- Building height = 10 ft
-- ACAM calculates area to be coated based on total building area
-- Default ACAM values for:
--- Average work days per week (day)
--- Average worker round trip commute (mile)

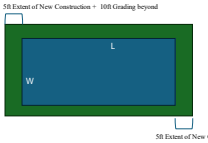
Area of Architectural Coating (ft^2)			
L (ft)	W (ft)	Extent of New Construction (ft)	$Area_{Coating}$ (ft^2)
3605.551275	1802.775638	10	40637.45185

Notes:
-- Assumed 75% of total surface area will be couted
--- Assumed openings (e.g., doors, windows, etc.) make up 25% of surface area
-- Extent of New Construction is 5ft on all sides as specified by CATEX 8

Equation 11:

$$Area_{Coating} = [(W + 10) \times (L + 10) - (W \times L)] \times 0.75$$

5ft Extent of New Construction + 10ft Grading beyond



5ft Extent of New Construction + 10ft Grading beyond

Where:

$Area_{Coating}$	= Area of the site to be coated (ft^2)
W	= Width of building (ft)
10	= Extent of new construction (ft)
L	= Length of the building (ft)
0.75	= 75% of total surface area will be coard

Coating Phase Duration (day)		
$\%_{Coating}$	$Duration_{Proj}$ (day)	$Duration_{Coating}$ (day)
5%	365	18.25

Notes:
-- $\%_{Coating}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 12:

$$Duration_{Coating} = \%_{Coating} \times Duration_{Proj}$$

Where:

$Duration_{Coating}$	= Duration of coating phase (day)
$\%_{Coating}$	= Percent of total project duration spent in coating phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Paving (Asphalt)

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Hauling capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)

Area of Paving (ft^2)			
L (ft)	**W (ft)**	**Extent of New Construction (ft)**	**$Area_{Paving}$(ft^2)**
3605.551275	1802.775638	10	54183.26913

Notes:
-- CATEX DoW A90-8 specifies construction within 5ft line of the building
-- Assumed entire area of new construction will be paved

Equation 13:

$$Area_{Paving} = [(W + 10) \times (L + 10)] - (W \times L)$$

Where:

$Area_{Paving}$	= Area of the site to be paved (ft^2)
W	= Width of building (ft)
10	= Extent of new construction (ft)
L	= Length of the building (ft)

Paving Phase Duration (day)		
$\%_{Paving}$	**$Duration_{Proj}$ (day)**	**$Duration_{Paving}$(day)**
5%	365	18.25

Notes:
-- $\%_{Paving}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 14:

$$Duration_{Paving} = \%_{Paving} \times Duration_{Proj}$$

Where:

$Duration_{Paving}$	= Duration of paving phase (day)
$\%_{Paving}$	= Percent of total project duration spent in paving phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Attachment B: Worst-Case Personnel Increase ACAM Analysis

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

Report generated with ACAM version: 5.0.24a

a. Action Location:
Base: Generic
State:
County(s):
Regulatory Area(s):

b. Action Title: Worst-Case Personnel

c. Project Number/s (if applicable): Worst-Case Personnel CATEX

d. Projected Action Start Date: 1 / 2027

e. Action Description:

General Assumptions:
-- Assumed a 4,600 personnel increase was a "worst-case" personnel increase
-- Assumed all 4,6000 personnel were active duty (worst-case)

f. Point of Contact:
Name:
Title:
Organization:
Email:
Phone Number:

2. Analysis: Total reasonably foreseeable net change in direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" (highest annual emissions) and "steady state" (no net gain/loss in emission stabilized and the action is fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

All emissions estimates were derived from various sources using the methods, algorithms, and emission factors from the most current *Air Emissions Guide for Air Force Stationary Sources*, *Air Emissions Guide for Air Force Mobile Sources*, and/or *Air Emissions Guide for Air Force Transitory Sources*. For greater details of this analysis, refer to the Detail ACAM Report.

____ applicable
_X_ not applicable

Conformity Analysis Summary:

2027

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)

AIR CONFORMITY APPLICABILITY MODEL REPORT
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VOC	7.637	10	No
NOx	3.679	10	No
CO	97.302	100	No
SOx	0.076	100	No
PM 10	0.573	70	No
PM 2.5	0.203	70	No
Pb	0.000	25	No
NH3	1.147	70	No

2028 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	7.637	10	No
NOx	3.679	10	No
CO	97.302	100	No
SOx	0.076	100	No
PM 10	0.573	70	No
PM 2.5	0.203	70	No
Pb	0.000	25	No
NH3	1.147	70	No

The Criteria Pollutants (or their precursors) with a General Conformity threshold listed in the table above are pollutants within one or more designated nonattainment or maintenance area/s for the associated National Ambient Air Quality Standard (NAAQS). These pollutants are driving this GCR Applicability Analysis. Pollutants exceeding the GCR thresholds must be further evaluated potentially through a GCR Determination.

The pollutants without a General Conformity threshold are pollutants only within areas designated attainment for the associated NAAQS. These pollutants have an insignificance indicator for VOC, NOx, CO, SOx, PM 10, PM 2.5, and NH3 of 250 ton/yr (Prevention of Significant Deterioration major source threshold) and 25 ton/yr for Pb (GCR de minimis value). Pollutants below their insignificance indicators are at rates so insignificant that they will not cause or contribute to an exceedance of one or more NAAQSs. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Refer to the *Level II, Air Quality Quantitative Assessment Insignificance Indicators* for further details.

None of the annual net change in estimated emissions associated with this action are above the GCR threshold values established at 40 CFR 93.153 (b); therefore, the proposed Action has an insignificant impact on Air Quality and a General Conformity Determination is not applicable.

Name, Title **Date**

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location
Base: Generic
State:
County(s):
Regulatory Area(s):

- Action Title: Worst-Case Personnel

- Project Number/s (if applicable): Worst-Case Personnel Increase

- Projected Action Start Date: 1 / 2027

- Action Purpose and Need:
Personnel actions have the potential to cause a large net increase in emissions primarily through an increase in on-road vehicles. As a result, personnel CATEXs without conditions cannot be entirely validated as the size and scope of the personnel increase cannot be assessed without further evaluation . This analysis was performed to determine the "worst-case" permanent personnel increase while remaining de minimis.

- Action Description:
General Assumptions:
-- Assumed a 4,600 personnel increase was a "worst-case" personnel increase
-- Assumed all 4,6000 personnel were active duty (worst-case)

- Point of Contact
Name:
Title:
Organization:
Email:
Phone Number:

Report generated with ACAM version: 5.0.24a

- Activity List:

Activity Type		Activity Title
2.	Personnel	Worst Case Personnel Increase

Emission factors and air emission estimating methods come from the United States Air Force's Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and Air Emissions Guide for Air Force Transitory Sources.

2. Personnel

2.1 General Information & Timeline Assumptions

- Add or Remove Activity from Baseline? Add

- Activity Location
County:
Regulatory Area(s):

- Activity Title: Worst Case Personnel Increase

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

- Activity Description:

General Assumptions:
-- Assumed 4,600 personnel increase was a "worst-case" scenario
-- Assumed all 4,6000 personnel were active duty (worst-case)

- Activity Start Date

Start Month: 1
Start Year: 2027

- Activity End Date

Indefinite: Yes
End Month: N/A
End Year: N/A

- Activity Emissions of Criteria Pollutants:

Pollutant	Emissions Per Year (TONs)
VOC	7.636729
SO_x	0.076426
NO_x	3.678964
CO	97.302291

Pollutant	Emissions Per Year (TONs)
PM 10	0.573004
PM 2.5	0.202938
Pb	0.000000
NH_3	1.147121

- Global Scale Activity Emissions of Greenhouse Gasses:

Pollutant	Emissions Per Year (TONs)
CH_4	0.405121
N_2O	0.158539

Pollutant	Emissions Per Year (TONs)
CO_2	9759.745052
CO_2e	9813.098135

2.2 Personnel Assumptions

- Number of Personnel

Active Duty Personnel: 4600
Civilian Personnel: 0
Support Contractor Personnel: 0
Air National Guard (ANG) Personnel: 0
Reserve Personnel: 0

- Default Settings Used: Yes

- Average Personnel Round Trip Commute (mile): 20 (default)

- Personnel Work Schedule

Active Duty Personnel: 5 Days Per Week (default)
Civilian Personnel: 5 Days Per Week (default)
Support Contractor Personnel: 5 Days Per Week (default)
Air National Guard (ANG) Personnel: 4 Days Per Week (default)
Reserve Personnel: 4 Days Per Month (default)

2.3 Personnel On Road Vehicle Mixture

- On Road Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	37.55	60.32	0	0.03	0.2	0	1.9
GOVs	54.49	37.73	4.67	0	0	3.11	0

2.4 Personnel Emission Factor(s)

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

- On Road Vehicle Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.27416	0.00248	0.10084	3.70965	0.02111	0.00695	0.04801
LDGT	0.22563	0.00316	0.14846	3.42676	0.02181	0.00772	0.04043
HDGV	0.69421	0.00679	0.51001	8.44590	0.04633	0.02228	0.08477
LDDV	0.12128	0.00127	0.18149	6.53169	0.02290	0.00805	0.01633
LDDT	0.11855	0.00127	0.21294	3.30773	0.02111	0.00791	0.01612
HDDV	0.10054	0.00420	2.27586	1.51941	0.15019	0.07085	0.06697
MC	2.64520	0.00304	0.61089	11.63494	0.03138	0.02161	0.05504

- On Road Vehicle Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01316	0.00484	316.32101	317.97246
LDGT	0.01385	0.00686	402.77281	404.97811
HDGV	0.04206	0.02308	864.55240	871.84705
LDDV	0.04775	0.00067	375.51899	377.03422
LDDT	0.02587	0.00098	377.57870	378.56301
HDDV	0.02208	0.16498	1251.15042	1295.48790
MC	0.10526	0.00285	393.87983	397.58149

2.5 Personnel Formula(s)

- Personnel Vehicle Miles Travel for Work Days per Year

$VMT_P = NP * WD * AC$

VMT_P: Personnel Vehicle Miles Travel (miles/year)
NP: Number of Personnel
WD: Work Days per Year
AC: Average Commute (miles)

- Total Vehicle Miles Travel per Year

$VMT_{Total} = VMT_{AD} + VMT_C + VMT_{SC} + VMT_{ANG} + VMT_{AFRC}$

VMT_{Total}: Total Vehicle Miles Travel (miles)
VMT_{AD}: Active Duty Personnel Vehicle Miles Travel (miles)
VMT_C: Civilian Personnel Vehicle Miles Travel (miles)
VMT_{SC}: Support Contractor Personnel Vehicle Miles Travel (miles)
VMT_{ANG}: Air National Guard Personnel Vehicle Miles Travel (miles)
VMT_{AFRC}: Reserve Personnel Vehicle Miles Travel (miles)

- Vehicle Emissions per Year

$V_{POL} = (VMT_{Total} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{Total}: Total Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Personnel On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

Attachment C: Worst-Case Large-Scale Construction ACAM Analysis

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

Report generated with ACAM version: 5.0.24a

a. Action Location:

Base: Generic
State:
County(s):
Regulatory Area(s):

b. Action Title: Large Construction CATEX Validation (1 Million sqft)

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2026

e. Action Description:

General Assumptions:
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
-- Assumed a DAF average building height of 10ft
-- 1 year total construction project duration chosen as worst-case scenario
--Area of building assumed to be 1000000 ft^2
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

f. Point of Contact:

Name:
Title:
Organization:
Email:
Phone Number:

2. Analysis: Total reasonably foreseeable net change in direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" (highest annual emissions) and "steady state" (no net gain/loss in emission stabilized and the action is fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

All emissions estimates were derived from various sources using the methods, algorithms, and emission factors from the most current *Air Emissions Guide for Air Force Stationary Sources*, *Air Emissions Guide for Air Force Mobile Sources*, and/or *Air Emissions Guide for Air Force Transitory Sources*. For greater details of this analysis, refer to the Detail ACAM Report.

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

____ applicable
_X_ not applicable

Conformity Analysis Summary:

2026

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	8.934	10	No
NOx	2.232	10	No
CO	2.452	100	No
SOx	0.005	100	No
PM 10	8.402	70	No
PM 2.5	0.076	70	No
Pb	0.000	25	No
NH3	0.025	70	No

2027 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	0.000	10	No
NOx	0.000	10	No
CO	0.000	100	No
SOx	0.000	100	No
PM 10	0.000	70	No
PM 2.5	0.000	70	No
Pb	0.000	25	No
NH3	0.000	70	No

The Criteria Pollutants (or their precursors) with a General Conformity threshold listed in the table above are pollutants within one or more designated nonattainment or maintenance area/s for the associated National Ambient Air Quality Standard (NAAQS). These pollutants are driving this GCR Applicability Analysis. Pollutants exceeding the GCR thresholds must be further evaluated potentially through a GCR Determination.

The pollutants without a General Conformity threshold are pollutants only within areas designated attainment for the associated NAAQS. These pollutants have an insignificance indicator for VOC, NOx, CO, SOx, PM 10, PM 2.5, and NH3 of 250 ton/yr (Prevention of Significant Deterioration major source threshold) and 25 ton/yr for Pb (GCR de minimis value). Pollutants below their insignificance indicators are at rates so insignificant that they will not cause or contribute to an exceedance of one or more NAAQSs. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Refer to the *Level II, Air Quality Quantitative Assessment Insignificance Indicators* for further details.

None of the annual net change in estimated emissions associated with this action are above the GCR threshold values established at 40 CFR 93.153 (b); therefore, the proposed Action has an insignificant impact on Air Quality and a General Conformity Determination is not applicable.

Name, Title **Date**

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location
Base: Generic
State:
County(s):
Regulatory Area(s):

- Action Title: Large Construction CATEX Validation (1 Million sqft)

- Project Number/s (if applicable):

- Projected Action Start Date: 1 / 2026

- Action Purpose and Need:
Regrettably, large-scale construction activities can potentially produce a significant amount of air emissions that could be a health hazard. To verify construction actions as de minimis, a de minimis activity evaluation was performed for the worst-case large scale construction action . This analysis aims to aid in revalidating CATEXs involving large-scale construction by analyzing the emissions for the "worst-case" large-scale construction project.

- Action Description:
General Assumptions:
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Constructing a one-story building would result in the greatest travel distance and therefore is the greatest emissions scenario
-- Assumed a DAF average building height of 10ft
-- 1 year total construction project duration chosen as worst-case scenario
--Area of building assumed to be 1000000 ft^2
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

- Point of Contact
Name:
Title:
Organization:
Email:
Phone Number:

Report generated with ACAM version: 5.0.24a

- Activity List:

Activity Type		Activity Title
2.	Construction / Demolition	Major Construction Validation

Emission factors and air emission estimating methods come from the United States Air Force's Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and Air Emissions Guide for Air Force Transitory Sources.

2. Construction / Demolition

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.1 General Information & Timeline Assumptions

- Activity Location
County:
Regulatory Area(s):

- Activity Title: Major Construction Validation

- Activity Description:
General Assumptions
-- Area of building assumed to be 1000000 ft^2
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Demolition Assumptions
-- Assumed worst-case building is demolished and replaced with a building of equal size
-- Assumed entire building will be demolished
-- Assumed 5% of total construction project duration is spent in demolition

Site Grading Assumptions
-- Assumed reasonably forseeable worst case is to grade 10ft beyond building on every side
-- Assumed 50% of trench volume during site grading will be hauled on-site and off-site
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Site grading trench depth assumed to be 1ft
-- Assumed 5% of total construction project duration is spent in site grading

Excavating/Trenching Assumptions
-- Assumed 3 trenches will be made in the excavating/trenching phase
--- 1 trench for water utility, 1 trench for sewer utility, and 1 trench for electrical utility
-- Assumed each trench will be 1ft wide
-- Trenches for excavation/trenching assumed to be 5ft deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching
--Assumed 5% of total construction project duration is spent in excavation/trenching

Building Construction Assumptions
-- Assumed to be a non-residential building
-- Assumed 75% of total construction project duration is spent in building construction phase

Architectural Coating Assumptions
-- Assumed to be a non-residential building
-- Assumed 75% of total surface area will be coated
-- Assumed 5% of total construction project duration is spent in architectural coating phase

Paving Asphalt Assumptions
-- Assumed entire area of new construction will be paved
-- Assumed 5% of total construction project duration is spent paving

- Activity Start Date
Start Month: 1
Start Month: 2026

- Activity End Date
Indefinite: False
End Month: 12
End Month: 2026

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

- Activity Emissions:

Pollutant	Total Emissions (TONs)
VOC	8.934456
SO_x	0.004750
NO_x	2.232190
CO	2.451856

Pollutant	Total Emissions (TONs)
PM 10	8.401981
PM 2.5	0.076454
Pb	0.000000
NH_3	0.024788

- Global Scale Activity Emissions of Greenhouse Gasses:

Pollutant	Total Emissions (TONs)
CH_4	0.021630
N_2O	0.057586

Pollutant	Total Emissions (TONs)
CO_2	775.400747
CO_2e	791.266571

2.1 Demolition Phase

2.1.1 Demolition Phase Timeline Assumptions

- Phase Start Date
Start Month: 1
Start Quarter: 1
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.1.2 Demolition Phase Assumptions

- General Demolition Information
Area of Building to be demolished (ft^2): 1000000
Height of Building to be demolished (ft): 10

- Default Settings Used: Yes

- Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	3	8
Rubber Tired Dozers Composite	2	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.1.3 Demolition Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.39317	0.00542	3.40690	4.22083	0.09860	0.09071
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.35280	0.00491	3.22260	2.72624	0.14205	0.13069

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	587.02896	589.04350
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02160	0.00432	532.54993	534.37751

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.1.4 Demolition Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (0.00042 * BA * BH) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
0.00042: Emission Factor (lb/ft^3)
BA: Area of Building to be demolished (ft^2)
BH: Height of Building to be demolished (ft)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = BA * BH * (1 / 27) * 0.25 * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
BA: Area of Building being demolish (ft^2)
BH: Height of Building being demolish (ft)
(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
0.25: Volume reduction factor (material reduced by 75% to account for air space)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.2 Site Grading Phase

2.2.1 Site Grading Phase Timeline Assumptions

- Phase Start Date

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

Start Month: 1
Start Quarter: 3
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.2.2 Site Grading Phase Assumptions

- General Site Grading Information
Area of Site to be Graded (ft^2): 1042827
Amount of Material to be Hauled On-Site (yd^3): 19312
Amount of Material to be Hauled Off-Site (yd^3): 19312

- Site Grading Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	1	8
Graders Composite	1	8
Other Construction Equipment Composite	1	8
Rollers Composite	1	8
Rubber Tired Dozers Composite	1	8
Scrapers Composite	3	8
Tractors/Loaders/Backhoes Composite	3	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.2.3 Site Grading Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.39317	0.00542	3.40690	4.22083	0.09860	0.09071
Graders Composite [HP: 148] [LF: 0.41]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.31292	0.00490	2.52757	3.39734	0.14041	0.12918

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Other Construction Equipment Composite [HP: 82] [LF: 0.42]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.28160	0.00487	2.73375	3.50416	0.15811	0.14546
Rollers Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.54202	0.00541	3.61396	4.09268	0.15387	0.14156
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.35280	0.00491	3.22260	2.72624	0.14205	0.13069
Scrapers Composite [HP: 423] [LF: 0.48]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.19606	0.00488	1.74061	1.53912	0.06788	0.06245
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	587.02896	589.04350
Graders Composite [HP: 148] [LF: 0.41]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02153	0.00431	530.81500	532.63663
Other Construction Equipment Composite [HP: 82] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02140	0.00428	527.54121	529.35159
Rollers Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	586.91372	588.92786
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02160	0.00432	532.54993	534.37751
Scrapers Composite [HP: 423] [LF: 0.48]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02145	0.00429	528.85412	530.66901
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**	**NH_3**
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	**N_2O**	**CO_2**	**CO_2e**
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353

LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.2.4 Site Grading Phase Formula(s)

- Fugitive Dust Emissions per Phase
$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)
WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase
$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works

NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.3 Trenching/Excavating Phase

2.3.1 Trenching / Excavating Phase Timeline Assumptions

- Phase Start Date
Start Month: 2
Start Quarter: 1
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.3.2 Trenching / Excavating Phase Assumptions

- General Trenching/Excavating Information
Area of Site to be Trenched/Excavated (ft^2): 6373
Amount of Material to be Hauled On-Site (yd^3): 1181
Amount of Material to be Hauled Off-Site (yd^3): 1181

- Trenching Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	2	8
Other General Industrial Equipmen Composite	1	8
Tractors/Loaders/Backhoes Composite	1	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC

POVs	50.00	50.00	0	0	0	0	0

2.3.3 Trenching / Excavating Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.39317	0.00542	3.40690	4.22083	0.09860	0.09071
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.45335	0.00542	3.58824	4.59368	0.11309	0.10404
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	587.02896	589.04350
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02385	0.00477	587.87714	589.89459
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**	**NH_3**
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	**N_2O**	**CO_2**	**CO_2e**
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.3.4 Trenching / Excavating Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)

WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.4 Building Construction Phase

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2.4.1 Building Construction Phase Timeline Assumptions

- Phase Start Date
Start Month: 2
Start Quarter: 3
Start Year: 2026

- Phase Duration
Number of Month: 9
Number of Days: 4

2.4.2 Building Construction Phase Assumptions

- General Building Construction Information
Building Category: Office or Industrial
Area of Building (ft^2): 1000000
Height of Building (ft): 10
Number of Units: N/A

- Building Construction Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Cranes Composite	1	7
Forklifts Composite	3	8
Generator Sets Composite	1	8
Tractors/Loaders/Backhoes Composite	3	7
Welders Composite	1	8

- Vehicle Exhaust
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

- Vendor Trips
Average Vendor Round Trip Commute (mile): 40 (default)

- Vendor Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

2.4.3 Building Construction Phase Emission Factor(s)

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- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Cranes Composite [HP: 367] [LF: 0.29]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.19758	0.00487	1.83652	1.63713	0.07527	0.06925
Forklifts Composite [HP: 82] [LF: 0.2]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.24594	0.00487	2.34179	3.57902	0.11182	0.10287
Generator Sets Composite [HP: 14] [LF: 0.74]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.53947	0.00793	4.32399	2.85973	0.17412	0.16019
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839
Welders Composite [HP: 46] [LF: 0.45]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.46472	0.00735	3.57020	4.49314	0.09550	0.08786

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Cranes Composite [HP: 367] [LF: 0.29]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02140	0.00428	527.46069	529.27080
Forklifts Composite [HP: 82] [LF: 0.2]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02138	0.00428	527.09717	528.90603
Generator Sets Composite [HP: 14] [LF: 0.74]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02305	0.00461	568.32694	570.27730
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468
Welders Composite [HP: 46] [LF: 0.45]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02305	0.00461	568.29068	570.24091

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**	**NH_3**
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	**N_2O**	**CO_2**	**CO_2e**
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.4.4 Building Construction Phase Formula(s)

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = BA * BH * (0.42 / 1000) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
BA: Area of Building (ft^2)
BH: Height of Building (ft)
(0.42 / 1000): Conversion Factor ft^3 to trips (0.42 trip / 1000 ft^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase
$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Vender Trips Emissions per Phase
$VMT_{VT} = BA * BH * (0.38 / 1000) * HT$

VMT_{VT}: Vender Trips Vehicle Miles Travel (miles)

BA: Area of Building (ft^2)
BH: Height of Building (ft)
(0.38 / 1000): Conversion Factor ft^3 to trips (0.38 trip / 1000 ft^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VT}: Vender Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.5 Architectural Coatings Phase

2.5.1 Architectural Coatings Phase Timeline Assumptions

- Phase Start Date
Start Month: 11
Start Quarter: 3
Start Year: 2026

- Phase Duration
Number of Month: 0
Number of Days: 18

2.5.2 Architectural Coatings Phase Assumptions

- General Architectural Coatings Information
Building Category: Non-Residential
Total Square Footage (ft^2): 750000
Number of Units: N/A

- Architectural Coatings Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.5.3 Architectural Coatings Phase Emission Factor(s)

- Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629

MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.5.4 Architectural Coatings Phase Formula(s)

- Worker Trips Emissions per Phase

$VMT_{WT} = (1 * WT * PA) / 800$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
1: Conversion Factor man days to trips (1 trip / 1 man * day)
WT: Average Worker Round Trip Commute (mile)
PA: Paint Area (ft^2)
800: Conversion Factor square feet to man days (1 ft^2 / 1 man * day)

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Off-Gassing Emissions per Phase

$VOC_{AC} = (AB * 2.0 * 0.0116) / 2000.0$

VOC_{AC}: Architectural Coating VOC Emissions (TONs)
BA: Area of Building (ft^2)
2.0: Conversion Factor total area to coated area (2.0 ft^2 coated area / total area)
0.0116: Emission Factor (lb/ft^2)
2000: Conversion Factor pounds to tons

2.6 Paving Phase

2.6.1 Paving Phase Timeline Assumptions

- Phase Start Date

Start Month: 12
Start Quarter: 1
Start Year: 2026

- Phase Duration

Number of Month: 0
Number of Days: 18

2.6.2 Paving Phase Assumptions

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

- General Paving Information
Paving Area (ft^2): 1000000

- Paving Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Pavers Composite	1	8
Paving Equipment Composite	2	8
Rollers Composite	2	6

- Vehicle Exhaust
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.6.3 Paving Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Pavers Composite [HP: 81] [LF: 0.42]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.23717	0.00486	2.53335	3.43109	0.12904	0.11872
Paving Equipment Composite [HP: 89] [LF: 0.36]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18995	0.00487	2.06537	3.40278	0.08031	0.07388
Rollers Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.54202	0.00541	3.61396	4.09268	0.15387	0.14156

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Pavers Composite [HP: 81] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02133	0.00427	525.80405	527.60847
Paving Equipment Composite [HP: 89] [LF: 0.36]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02141	0.00428	527.70636	529.51732
Rollers Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	586.91372	588.92786

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.6.4 Paving Phase Formula(s)

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * EF_{POL}) / 2000$

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = PA * 0.25 * (1 / 27) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
PA: Paving Area (ft^2)
0.25: Thickness of Paving Area (ft)
(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)

2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Off-Gassing Emissions per Phase

$VOC_P = (2.62 * PA) / 43560 / 2000$

VOC_P: Paving VOC Emissions (TONs)
2.62: Emission Factor (lb/acre)
PA: Paving Area (ft^2)
43560: Conversion Factor square feet to acre (43560 ft2 / acre)^2 / acre)
2000: Conversion Factor square pounds to TONs (2000 lb / TON)

General Assumptions

-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles
-- Constructing a one-story building would result in the greatest travel distances and; therefore, the greatest emissions scenario
-- Assumed DAF average building height of 10 ft
-- 1 Year selected as worst-case total construction project duration

L x W = Area
2W X W = Area
$2W^2$ = Area
W = SQRT(Area/2)

Existing Building Dimensions		
W (ft)	Ratio (L:W)	L (ft)
707.1067812	2	1414.213562

Building Area = 1000000 sqft

-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

W = 707.1068 ft

Equation 1:

$$L = 2W$$

Where:

L	= Length of building (ft)
2	= Existing building length to width ratio
W	= Width of building (ft)

Demolition

Notes:
-- Height of building assumed to be 10ft
-- Assumed worst-case building is demolished and replaced with a building of equal size
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)
--- Equipment

Area to be Demolished (ft^2)		
L (ft)	W (ft)	$Area_{Demo}$ (ft^2)
1414.213562	707.1067812	1000000

Notes:
-- Assumed entire building is demolished

Equation 2:

$$Area_{Demo} = W \times L$$

Where:

$Area_{Demo}$	= Area of the site to be demolished (ft^2)
L	= Length of building (ft)
W	= Width of building (ft)

Demolition Phase Duration (day)		
$\%_{Demo}$	$Duration_{Proj}$ (day)	$Duration_{Demo}$ (day)
5%	365	18.25

Notes:
-- $\%_{Demo}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 3:

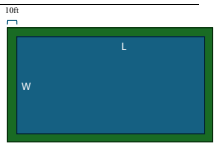
$$Duration_{Demo} = \%_{Demo} \times Duration_{Proj}$$

Where:

$Duration_{Demo}$	= Duration of demolition phase (day)
$\%_{Demo}$	= Percent of total project duration spent in demolition phase (%)
$Duration_{Days}$	= Duration of total project (day)

Site Grading

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker round trip commute (mile)
--- Equipment



Area to be Graded (ft^2)			
L (ft)	W (ft)	Worst-Case Grading Beyond New Construction	$Area_{Graded}$ (ft^2)
1414.213562	707.1067812	20	1042826.407

Notes:
-- Assumed reasonably foreseeable worst case is to grade 10ft beyond new construction on every side

Equation 4:

$$Area_{Graded} = (W + 20) \times (L + 20)$$

Where:

$Area_{Graded}$	= Area of the site to be graded (ft^2)
W	= Width of building (ft)
20	= Worst-case reasonably forseeable grading outside building (ft)
L	= Length of building (ft)

Site Grading Material Hauled On-Site and Off-Site (ft^3)					
$Area_{Graded}$ (ft^2)	$\%_{GV}$	$Depth_{Graded}$ (ft)	Cubic Feet per Cubic Yard	$Hauled_{Graded}$ On-Site (yd^3)	$Hauled_{Graded}$ Off-Site (yd^3)
1042826.407	50%	1	27	19311.60013	19311.60013

Notes:
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Site grading trench depth assumed to be 1ft

Equation 5:

$$Hauled_{Graded} = \frac{Area_{Graded} \times \%_{GV} \times Depth_{Graded}}{27}$$

Where:

$Hauled_{Graded}$	= Volume of material hauled on-site/off-site during site grading phase (yd^3)
$Area_{Graded}$	= Area of the site to be graded (ft^2)
$\%_{GV}$	= % of trench volume during site grading that will be hauled on-site and off-site during site grading (%)
$Depth_{Graded}$	= Depth of site graded (ft)
27	= Cubic feet to cubic yard conversion (1 cubic yard = 27 cubic foot)

Site Grading Phase Duration (day)		
$\%_{Grade}$	$Duration_{Proj}$ (day)	$Duration_{Grade}$ (day)
5%	365	18.25

Notes:
-- $\%_{Grade}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 years (365 days)

Equation 6:

$$Duration_{Graded} = \%_{Graded} \times Duration_{Proj}$$

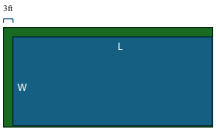
Where:

$Duration_{Graded}$	= Duration of site grading phase (day)
$\%_{Graded}$	= Percent of total project duration spent in site grading phase (%)
$Duration_{Days}$	= Duration of toal project (day)

Excavating/Trenching

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)
--- Equipment

Excavated Area (ft^2)			
$Width_{Excavated}$ (ft)	L (ft)	W (ft)	$Area_{Excavated}$ (ft^2)
3	1414.213562	707.1067812	6372.961031



Notes:
-- Assumed 3 trenches will be made in the excavating/trenching phase
--- 1 trench for water utilities, 1 trench for sewer utilities, and 1 trench for electrical utilities
-- Assumed each trench will be 1ft wide

Equation 8:

$$Area_{Excavated} = (W + Width_{Excavated}) \times (L + Width_{Excavated}) - (W \times L)$$

Where:

$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
$Width_{Excavated}$	= Total width of excavated trenches, 3 trenches at 1ft wide (ft)
L	= Length of building (ft)
W	= Width of building (ft)

Excavating Material Hauled On-Site and Off-Site (ft^3)				
$Area_{Excavated}$ (ft^2)	$Depth_{Excavated}$	Cubic Feet per Cubic Yard	$Hauling_{Excavated}$ On-Site (yd^3)	$Hauling_{Excavated}$ Off-Site (yd^3)
6372.961031	5	27	1180.177969	1180.177969

Notes:
-- Note trenches for excavation are assumed to be 5 feet deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching

Equation 9:

$$Hauling_{Excavated} = \frac{Area_{Excavated} \times Depth_{Excavated}}{27}$$

Where:

$Hauling_{Excavated}$	= Volume of material hauled on-site/off-site during excavating phase (yd^3)
$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
$Depth_{Excavated}$	= Depth of treenhes created during excavation/trenching site phases (ft)
27	= Cubic feet to cubic yard conversion (1 cubic yard = 27 cubic foot)

Excavation Phase Duration (day)		
$\%_{Excavated}$	$Duration_{Proj}$ (day)	$Duration_{Excavated}$ (day)
5%	365	18.25

Notes:
-- $\%_{Excavated}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 10:

$$Duration_{Excavated} = \%_{Excavated} \times Duration_{Proj}$$

Where:

$Duration_{Excavated}$	= Duration of excavation phase (day)
$\%_{Excavated}$	= Percent of total project duration spent in excavation phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Building Construction

Notes:
-- Building category: Non-residential
-- Building height = 10 ft
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Worker commute (mile)
--- Equipment
--- Average hauling truck round trip commute (mile)
--- Average hauling roundtrip commute (mile)
--- Average vendor round trip commute (mile)

Area of New Construction (ft^2)		
L (ft)	W (ft)	$Area_{Construction}$ (ft^2)
1414.213562	707.1067812	1000000

Notes:

Equation 11:

$$Area_{Costruction} = W \times L$$

Where:

$Area_{Construction}$	= Area of the site to be graded (ft^2)
W	= Width of building (ft)
L	= Length of the building (ft)

Construction Phase Duration (day)		
$\%_{Construction}$	$Duration_{Proj}$ (day)	$Duration_{Construction}$ (day)
75%	365	273.75

Notes:
-- $\%_{Construction}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 12:

$$Duration_{Construction} = \%_{Construction} \times Duration_{Proj}$$

Where:

$Duration_{Construction}$	= Duration of construction phase (day)
$\%_{Construction}$	= Percent of total project duration spent in construction phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Architectutal Coatings

Notes:
-- Building category: Non-residential
-- Building height = 10 ft
-- ACAM calculates area to be coated based on total building area
-- Default ACAM values for:
--- Average work days per week (day)
--- Average worker round trip commute (mile)

Area of Architectural Coating (ft^2)			
L (ft)	**W (ft)**	**% of Surface Area Coated**	**$Area_{Coating}$ (ft^2)**
1414.213562	707.1067812	75%	750000

Notes:
-- Assumed 75% of total surface area will be coated
--- Assumed openings (e.g., doors, windows, etc.) make up 25% of surface area

Equation 13:

$$Area_{Coating} = L \times W \times 75\%$$

Where:

$Area_{Coating}$	= Area of the site inputted into ACAM for coating (ft^2)
W	= Width of building (ft)
L	= Length of the building (ft)
75%	= 75% of total surface area will be coated

Coating Phase Duration (day)		
$\%_{Construction}$	**$Duration_{Proj}$ (day)**	**$Duration_{Coating}$ (day)**
5%	365	18.25

Notes:
-- $\%_{Coating}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 14:

$$Duration_{Coating} = \%_{Coating} \times Duration_{Proj}$$

Where:

$Duration_{Coating}$	= Duration of coating phase (day)
$\%_{Coating}$	= Percent of total project duration spent in coating phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Paving (Asphalt)

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)

Area of Paving (ft^2)		
L (ft)	**W (ft)**	**$Area_{Paving}$(ft^2)**
1414.213562	707.1067812	1000000

Notes:
-- Assumed entire area of new construction will be paved

Equation 15:

$$Area_{Paving} = W \times L$$

Where:

$Area_{Paving}$	= Area of the site to be paved (ft^2)
W	= Width of building (ft)
L	= Length of the building (ft)

Paving Phase Duration (day)		
$\%_{Paving}$	**$Duration_{Proj}$ (day)**	**$Duration_{Paving}$(day)**
5%	365	18.25

Notes:
-- $\%_{Paving}$ taken from "Phase Duration.xlsx"
-- Worst-case total project duration assumed to be 1 year (365 days)

Equation 16:

$$Duration_{Paving} = \%_{Paving} \times Duration_{Proj}$$

Where:

$Duration_{Paving}$	= Duration of paving phase (day)
$\%_{Paving}$	= Percent of total project duration spent in paving phase (%)
$Duration_{Proj}$	= Duration of toal project (day)

Attachment D: Worst-Case Demolition ACAM Analysis

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

Report generated with ACAM version: 5.0.24a

a. Action Location:
Base: Generic
State:
County(s):
Regulatory Area(s):

b. Action Title: DoW A22-6 CATEX Revalidation (Pentagon)

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2026

e. Action Description:

General Assumptions:
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Assumed a DAF average building height of 10ft
-- 1 year total demolition project duration chosen as worst-case scenario
--Area of existing building assumed to be 6500000 ft^2
--- 6500000 ft^2 taken from the pentagon having 6500000 ft^2 of office space

f. Point of Contact:
Name:
Title:
Organization:
Email:
Phone Number:

2. Analysis: Total reasonably foreseeable net change in direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" (highest annual emissions) and "steady state" (no net gain/loss in emission stabilized and the action is fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

All emissions estimates were derived from various sources using the methods, algorithms, and emission factors from the most current *Air Emissions Guide for Air Force Stationary Sources*, *Air Emissions Guide for Air Force Mobile Sources*, and/or *Air Emissions Guide for Air Force Transitory Sources*. For greater details of this analysis, refer to the Detail ACAM Report.

____ applicable
_X_ not applicable

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROCA)

Conformity Analysis Summary:

2026

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	0.407	10	No
NOx	4.560	10	No
CO	4.100	100	No
SOx	0.008	100	No
PM 10	13.872	70	No
PM 2.5	0.159	70	No
Pb	0.000	25	No
NH3	0.047	70	No

2027 - (Steady State)

Pollutant	Action Emissions (ton/yr)	GENERAL CONFORMITY	
		Threshold (ton/yr)	Exceedance (Yes or No)
VOC	0.000	10	No
NOx	0.000	10	No
CO	0.000	100	No
SOx	0.000	100	No
PM 10	0.000	70	No
PM 2.5	0.000	70	No
Pb	0.000	25	No
NH3	0.000	70	No

The Criteria Pollutants (or their precursors) with a General Conformity threshold listed in the table above are pollutants within one or more designated nonattainment or maintenance area/s for the associated National Ambient Air Quality Standard (NAAQS). These pollutants are driving this GCR Applicability Analysis. Pollutants exceeding the GCR thresholds must be further evaluated potentially through a GCR Determination.

The pollutants without a General Conformity threshold are pollutants only within areas designated attainment for the associated NAAQS. These pollutants have an insignificance indicator for VOC, NOx, CO, SOx, PM 10, PM 2.5, and NH3 of 250 ton/yr (Prevention of Significant Deterioration major source threshold) and 25 ton/yr for Pb (GCR de minimis value). Pollutants below their insignificance indicators are at rates so insignificant that they will not cause or contribute to an exceedance of one or more NAAQSs. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Refer to the *Level II, Air Quality Quantitative Assessment Insignificance Indicators* for further details.

None of the annual net change in estimated emissions associated with this action are above the GCR threshold values established at 40 CFR 93.153 (b); therefore, the proposed Action has an insignificant impact on Air Quality and a General Conformity Determination is not applicable.

Name, Title **Date**

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location
Base: Generic
State:
County(s):
Regulatory Area(s):

- Action Title: DoW A22-6 CATEX Revalidation (Pentagon)

- Project Number/s (if applicable):

- Projected Action Start Date: 1 / 2026

- Action Purpose and Need:
Regrettably, large construction activities can potentially produce a lot of air emissions that could be a health hazard. CATEX DoW A22-6 "Demolition of buildings, structures, or other improvements and disposal of debris therefrom, or removal of a part thereof for disposal, in accordance with applicable requirements, to include requirements associated with removal of asbestos, polychlorinated biphenyls (PCBs), lead-based paint, and other special hazards. For historic districts, sites, buildings, structures, or objects eligible for or included in the National Register of Historic Places, all requirements of the NHPA must be met (REC required)." needs further analysis in order to validate its use for the Department of the Air Force (DAF). As such, the worst-case demolition project was analyzed with all assumptions listed below. The wost-case demolition project was assumed to be the demolition of a building with the area of 6500000 ft^2.

- Action Description:
General Assumptions:
-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles.
-- Assumed a DAF average building height of 10ft
-- 1 year total demolition project duration chosen as worst-case scenario
--Area of existing building assumed to be 6500000 ft^2
--- 6500000 ft^2 taken from the pentagon having 6500000 ft^2 of office space

- Point of Contact
Name:
Title:
Organization:
Email:
Phone Number:

Report generated with ACAM version: 5.0.24a

- Activity List:

Activity Type		Activity Title
2.	Construction / Demolition	CATEX DoW A22-6

Emission factors and air emission estimating methods come from the United States Air Force's Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and Air Emissions Guide for Air Force Transitory Sources.

2. Construction / Demolition

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.1 General Information & Timeline Assumptions

- Activity Location
County:
Regulatory Area(s):

- Activity Title: CATEX DoW A22-6

- Activity Description:
General Assumptions
-- Area of building assumed to be 6500000 ft^2
-- A building length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Demolition Assumptions
-- Assumed entire building is demolished

- Activity Start Date
Start Month: 1
Start Month: 2026

- Activity End Date
Indefinite: False
End Month: 12
End Month: 2026

- Activity Emissions:

Pollutant	Total Emissions (TONs)
VOC	0.406876
SO_x	0.007761
NO_x	4.559965
CO	4.099880

Pollutant	Total Emissions (TONs)
PM 10	13.872212
PM 2.5	0.159005
Pb	0.000000
NH_3	0.046614

- Global Scale Activity Emissions of Greenhouse Gasses:

Pollutant	Total Emissions (TONs)
CH_4	0.036089
N_2O	0.112882

Pollutant	Total Emissions (TONs)
CO_2	1370.330306
CO_2e	1401.254296

2.1 Demolition Phase

2.1.1 Demolition Phase Timeline Assumptions

- Phase Start Date
Start Month: 1
Start Quarter: 1
Start Year: 2026

- Phase Duration
Number of Month: 12
Number of Days: 0

2.1.2 Demolition Phase Assumptions

- General Demolition Information
Area of Building to be demolished (ft^2): 6500000

Height of Building to be demolished (ft): 10

- Default Settings Used: Yes

- Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Concrete/Industrial Saws Composite	1	8
Excavators Composite	3	8
Rubber Tired Dozers Composite	2	8
Tractors/Loaders/Backhoes Composite	2	6

- Vehicle Exhaust

Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips

Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.1.3 Demolition Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Concrete/Industrial Saws Composite [HP: 33] [LF: 0.73]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.41257	0.00743	3.52633	4.31513	0.08509	0.07828
Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.39317	0.00542	3.40690	4.22083	0.09860	0.09071
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.35280	0.00491	3.22260	2.72624	0.14205	0.13069
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18406	0.00489	1.88476	3.48102	0.06347	0.05839

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Concrete/Industrial Saws Composite [HP: 33] [LF: 0.73]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02330	0.00466	574.35707	576.32812
Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02381	0.00476	587.02896	589.04350
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**

Emission Factors	0.02160	0.00432	532.54993	534.37751
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02149	0.00430	529.70686	531.52468

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.28205	0.00254	0.11281	3.85829	0.02168	0.00702	0.04966
LDGT	0.23437	0.00321	0.16561	3.61313	0.02225	0.00782	0.04200
HDGV	0.74775	0.00688	0.57684	9.22332	0.04765	0.02302	0.08683
LDDV	0.11423	0.00127	0.17300	6.28096	0.02260	0.00762	0.01627
LDDT	0.17733	0.00130	0.31279	4.31537	0.02243	0.00876	0.01613
HDDV	0.11313	0.00429	2.50975	1.57098	0.15756	0.07759	0.06629
MC	2.65682	0.00304	0.61236	11.75690	0.03152	0.02162	0.05472

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01394	0.00499	323.62510	325.33670
LDGT	0.01480	0.00706	409.16861	411.45489
HDGV	0.04545	0.02414	875.79391	883.46353
LDDV	0.04761	0.00067	377.24252	378.75385
LDDT	0.02604	0.00098	384.94663	385.93539
HDDV	0.02245	0.16346	1276.72605	1320.67136
MC	0.10657	0.00285	393.83243	397.57145

2.1.4 Demolition Phase Formula(s)

- Fugitive Dust Emissions per Phase
$PM10_{FD} = (0.00042 * BA * BH) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
0.00042: Emission Factor (lb/ft^3)
BA: Area of Building to be demolished (ft^2)
BH: Height of Building to be demolished (ft)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = BA * BH * (1 / 27) * 0.25 * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
BA: Area of Building being demolish (ft^2)
BH: Height of Building being demolish (ft)

(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
0.25: Volume reduction factor (material reduced by 75% to account for air space)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase
$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

Attachment E: Worst-Case Parking Lot ACAM Analysis

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROAA)

1. General Information: The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

Report generated with ACAM version: 5.0.24a

a. Action Location:
Base: Generic
State:
County(s):
Regulatory Area(s):

b. Action Title: DoW A18-2 Evaluation (10-Acre Parking Lot)

c. Project Number/s (if applicable):

d. Projected Action Start Date: 1 / 2027

e. Action Description:

General Assumptions:
- Area of parking lot is 10 acres or 435600 sqft
- A length to width ratio (L:W) of 2:1 for optimal vehicle travel distance was assumed to apply to the parking lot in the analysis
- For construction actions, the POC emissions generated are overwhelmingly from off-road and on-road vehicles
- 1-year total construction project duration chosen as the worst-case scenario
- Project involves site grading, trenching, and paving

f. Point of Contact:
Name:
Title:
Organization:
Email:
Phone Number:

2. Analysis: Total reasonably foreseeable net change in direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the "worst-case" (highest annual emissions) and "steady state" (no net gain/loss in emission stabilized and the action is fully implemented) emissions. General Conformity under the Clean Air Act, Section 1.76 has been evaluated for the action described above according to the requirements of 40 CFR 93, Subpart B.

All emissions estimates were derived from various sources using the methods, algorithms, and emission factors from the most current *Air Emissions Guide for Air Force Stationary Sources*, *Air Emissions Guide for Air Force Mobile Sources*, and/or *Air Emissions Guide for Air Force Transitory Sources*. For greater details of this analysis, refer to the Detail ACAM Report.

____ applicable
_X_ not applicable

AIR CONFORMITY APPLICABILITY MODEL REPORT
RECORD OF CONFORMITY ANALYSIS (ROAA)

Conformity Analysis Summary:

2027

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
VOC	0.143	10	No
NOx	1.187	10	No
CO	1.585	100	No
SOx	0.002	100	No
PM 10	18.174	70	No
PM 2.5	0.044	70	No
Pb	0.000	25	No
NH3	0.006	70	No

2028 - (Steady State)

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
VOC	0.000	10	No
NOx	0.000	10	No
CO	0.000	100	No
SOx	0.000	100	No
PM 10	0.000	70	No
PM 2.5	0.000	70	No
Pb	0.000	25	No
NH3	0.000	70	No

The Criteria Pollutants (or their precursors) with a General Conformity threshold listed in the table above are pollutants within one or more designated nonattainment or maintenance area/s for the associated National Ambient Air Quality Standard (NAAQS). These pollutants are driving this GCR Applicability Analysis. Pollutants exceeding the GCR thresholds must be further evaluated potentially through a GCR Determination.

The pollutants without a General Conformity threshold are pollutants only within areas designated attainment for the associated NAAQS. These pollutants have an insignificance indicator for VOC, NOx, CO, SOx, PM 10, PM 2.5, and NH3 of 250 ton/yr (Prevention of Significant Deterioration major source threshold) and 25 ton/yr for Pb (GCR de minimis value). Pollutants below their insignificance indicators are at rates so insignificant that they will not cause or contribute to an exceedance of one or more NAAQSs. These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Refer to the *Level II, Air Quality Quantitative Assessment Insignificance Indicators* for further details.

None of the annual net change in estimated emissions associated with this action are above the GCR threshold values established at 40 CFR 93.153 (b); therefore, the proposed Action has an insignificant impact on Air Quality and a General Conformity Determination is not applicable.

Name, Title **Date**

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

1. General Information

- Action Location
Base: Generic
State:
County(s):
Regulatory Area(s):

- Action Title: DoW A18-2 Evaluation (10-Acre Parking Lot)

- Project Number/s (if applicable):

- Projected Action Start Date: 1 / 2027

- Action Purpose and Need:
Regrettably, parking lot construction activities can potentially produce a level of air emissions that could be a health hazard. CATEX DoW A18-2 "Construction of new and expansion of existing parking lots and hardening of tank trails and turn pads on previously disturbed land and/or on undisturbed land, provided there are no more than 5 total acres of surface disturbance to undisturbed land. If a parking lot design will replicate the pre-development hydrology, limitation may be extended to 10 acres (REC required)" needs further analysis in order to validate its use for the Department of the Air Force (DAF). An analysis was performed for the worst-case 10-acre parking lot in accordance with the conditions of the CATEX.

- Action Description:
General Assumptions:
- Area of parking lot is 10 acres or 435600 sqft
- A length to width ratio (L:W) of 2:1 for optimal vehicle travel distance was assumed to apply to the parking lot in the analysis
- For construction actions, the POC emissions generated are overwhelmingly from off-road and on-road vehicles
- 1-year total construction project duration chosen as the worst-case scenario
- Project involves site grading, trenching, and paving

- Point of Contact
Name:
Title:
Organization:
Email:
Phone Number:

Report generated with ACAM version: 5.0.24a

- Activity List:

Activity Type		Activity Title
2.	Construction / Demolition	10-Acre Parking Lot

Emission factors and air emission estimating methods come from the United States Air Force's Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and Air Emissions Guide for Air Force Transitory Sources.

2. Construction / Demolition

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.1 General Information & Timeline Assumptions

- Activity Location
County:
Regulatory Area(s):

- Activity Title: 10-Acre Parking Lot

- Activity Description:
General Assumptions
-- Area of building assumed to be 10 acres or 435600 sqft
-- A length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Site Grading Assumptions
-- Assumed 100% of trench volume during site grading will be hauled on-site and off-site
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Site grading trench depth assumed to be 1ft
-- Assumed 1/3rd of total construction project duration is spent in site grading

Excavating/Trenching Assumptions
-- Assumed 1 trench in the excavating/trenching phase
-- Assumed trench is 14ft wide
-- Assumed trench is 18ft deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching
--Assumed 1/3rd of total construction project duration is spent in excavation/trenching

Paving Asphalt Assumptions
-- Assumed entire of parking lot is paved
-- Assumed 1/3rd of total construction project duration is spent paving

- Activity Start Date
Start Month: 1
Start Month: 2027

- Activity End Date
Indefinite: False
End Month: 12
End Month: 2027

- Activity Emissions:

Pollutant	Total Emissions (TONs)
VOC	0.143019
SO_x	0.002388
NO_x	1.187243
CO	1.585419

Pollutant	Total Emissions (TONs)
PM 10	18.174317
PM 2.5	0.043605
Pb	0.000000
NH_3	0.006340

- Global Scale Activity Emissions of Greenhouse Gasses:

Pollutant	Total Emissions (TONs)
CH_4	0.010962
N_2O	0.013383

Pollutant	Total Emissions (TONs)
CO_2	314.869386
CO_2e	318.722846

2.1 Site Grading Phase

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.1.1 Site Grading Phase Timeline Assumptions

- Phase Start Date
Start Month: 1
Start Quarter: 1
Start Year: 2027

- Phase Duration
Number of Month: 4
Number of Days: 0

2.1.2 Site Grading Phase Assumptions

- General Site Grading Information
Area of Site to be Graded (ft^2): 435600
Amount of Material to be Hauled On-Site (yd^3): 16134
Amount of Material to be Hauled Off-Site (yd^3): 16134

- Site Grading Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	1	8
Graders Composite	1	8
Other Construction Equipment Composite	1	8
Rubber Tired Dozers Composite	1	8
Tractors/Loaders/Backhoes Composite	3	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.1.3 Site Grading Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.37809	0.00542	3.36699	4.21640	0.08879	0.08169
Graders Composite [HP: 148] [LF: 0.41]						

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.29535	0.00490	2.28401	3.40565	0.12705	0.11688
Other Construction Equipment Composite [HP: 82] [LF: 0.42]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.25231	0.00487	2.49971	3.48392	0.13245	0.12186
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.34288	0.00492	3.09108	2.65644	0.13550	0.12466
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.17717	0.00489	1.80740	3.48712	0.05440	0.05005

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02383	0.00477	587.39431	589.41010
Graders Composite [HP: 148] [LF: 0.41]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02155	0.00431	531.25291	533.07604
Other Construction Equipment Composite [HP: 82] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02140	0.00428	527.44206	529.25211
Rubber Tired Dozers Composite [HP: 367] [LF: 0.4]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02160	0.00432	532.55942	534.38703
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02148	0.00430	529.61807	531.43559

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.29527	0.00267	0.11165	4.04986	0.02247	0.00738	0.04860
LDGT	0.23673	0.00337	0.16162	3.66495	0.02294	0.00810	0.04069
HDGV	0.72171	0.00731	0.54907	9.00968	0.04856	0.02324	0.08587
LDDV	0.12811	0.00127	0.17995	6.34364	0.02419	0.00836	0.01652
LDDT	0.12283	0.00127	0.20975	3.17905	0.02205	0.00817	0.01622
HDDV	0.10536	0.00420	2.31601	1.53236	0.15590	0.07313	0.06704
MC	2.60666	0.00332	0.61385	11.58201	0.03150	0.02142	0.05413

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01489	0.00497	318.16797	319.90147
LDGT	0.01534	0.00685	402.36986	404.61328
HDGV	0.04492	0.02324	872.02208	879.43932
LDDV	0.05106	0.00070	377.22210	378.83716
LDDT	0.02794	0.00100	376.78773	377.83642
HDDV	0.02425	0.16514	1250.29254	1294.73493
MC	0.09994	0.00291	391.84214	395.41274

2.1.4 Site Grading Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)
WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

DETAIL AIR CONFORMITY APPLICABILITY MODEL REPORT

2.2 Trenching/Excavating Phase

2.2.1 Trenching / Excavating Phase Timeline Assumptions

- Phase Start Date
Start Month: 5
Start Quarter: 1
Start Year: 2027

- Phase Duration
Number of Month: 4
Number of Days: 0

2.2.2 Trenching / Excavating Phase Assumptions

- General Trenching/Excavating Information
Area of Site to be Trenched/Excavated (ft^2): 19797
Amount of Material to be Hauled On-Site (yd^3): 13198
Amount of Material to be Hauled Off-Site (yd^3): 13198

- Trenching Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Excavators Composite	2	8
Other General Industrial Equipmen Composite	1	8
Tractors/Loaders/Backhoes Composite	1	8

- Vehicle Exhaust
Average Hauling Truck Capacity (yd^3): 20 (default)
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.2.3 Trenching / Excavating Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]						
	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.37809	0.00542	3.36699	4.21640	0.08879	0.08169
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]						

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5
Emission Factors	0.43579	0.00542	3.52468	4.59651	0.09918	0.09125
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.17717	0.00489	1.80740	3.48712	0.05440	0.05005

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Excavators Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02383	0.00477	587.39431	589.41010
Other General Industrial Equipmen Composite [HP: 35] [LF: 0.34]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02385	0.00477	587.92708	589.94470
Tractors/Loaders/Backhoes Composite [HP: 84] [LF: 0.37]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02148	0.00430	529.61807	531.43559

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.29527	0.00267	0.11165	4.04986	0.02247	0.00738	0.04860
LDGT	0.23673	0.00337	0.16162	3.66495	0.02294	0.00810	0.04069
HDGV	0.72171	0.00731	0.54907	9.00968	0.04856	0.02324	0.08587
LDDV	0.12811	0.00127	0.17995	6.34364	0.02419	0.00836	0.01652
LDDT	0.12283	0.00127	0.20975	3.17905	0.02205	0.00817	0.01622
HDDV	0.10536	0.00420	2.31601	1.53236	0.15590	0.07313	0.06704
MC	2.60666	0.00332	0.61385	11.58201	0.03150	0.02142	0.05413

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01489	0.00497	318.16797	319.90147
LDGT	0.01534	0.00685	402.36986	404.61328
HDGV	0.04492	0.02324	872.02208	879.43932
LDDV	0.05106	0.00070	377.22210	378.83716
LDDT	0.02794	0.00100	376.78773	377.83642
HDDV	0.02425	0.16514	1250.29254	1294.73493
MC	0.09994	0.00291	391.84214	395.41274

2.2.4 Trenching / Excavating Phase Formula(s)

- Fugitive Dust Emissions per Phase

$PM10_{FD} = (20 * ACRE * WD) / 2000$

$PM10_{FD}$: Fugitive Dust PM 10 Emissions (TONs)
20: Conversion Factor Acre Day to pounds (20 lb / 1 Acre Day)
ACRE: Total acres (acres)
WD: Number of Total Work Days (days)
2000: Conversion Factor pounds to tons

- Construction Exhaust Emissions per Phase

$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)

H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase

$VMT_{VE} = (HA_{OnSite} + HA_{OffSite}) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
HA_{OnSite}: Amount of Material to be Hauled On-Site (yd^3)
$HA_{OffSite}$: Amount of Material to be Hauled Off-Site (yd^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase

$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

2.3 Paving Phase

2.3.1 Paving Phase Timeline Assumptions

- Phase Start Date

Start Month: 9
Start Quarter: 1
Start Year: 2027

- Phase Duration

Number of Month: 4

Number of Days: 0

2.3.2 Paving Phase Assumptions

- General Paving Information
Paving Area (ft^2): 435600

- Paving Default Settings
Default Settings Used: Yes
Average Day(s) worked per week: 5 (default)

- Construction Exhaust (default)

Equipment Name	Number Of Equipment	Hours Per Day
Pavers Composite	1	8
Paving Equipment Composite	2	6
Rollers Composite	2	6

- Vehicle Exhaust
Average Hauling Truck Round Trip Commute (mile): 20 (default)

- Vehicle Exhaust Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	0	0	0	0	0	100.00	0

- Worker Trips
Average Worker Round Trip Commute (mile): 20 (default)

- Worker Trips Vehicle Mixture (%)

	LDGV	LDGT	HDGV	LDDV	LDDT	HDDV	MC
POVs	50.00	50.00	0	0	0	0	0

2.3.3 Paving Phase Emission Factor(s)

- Construction Exhaust Criteria Pollutant Emission Factors (g/hp-hour) (default)

Pavers Composite [HP: 81] [LF: 0.42]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.22921	0.00486	2.45013	3.43821	0.11941	0.10986
Paving Equipment Composite [HP: 89] [LF: 0.36]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.18341	0.00488	2.01586	3.40316	0.07465	0.06867
Rollers Composite [HP: 36] [LF: 0.38]						
	VOC	**SO_x**	**NO_x**	**CO**	**PM 10**	**PM 2.5**
Emission Factors	0.52865	0.00542	3.57666	4.10537	0.14602	0.13434

- Construction Exhaust Greenhouse Gasses Pollutant Emission Factors (g/hp-hour) (default)

Pavers Composite [HP: 81] [LF: 0.42]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02133	0.00427	525.80912	527.61356
Paving Equipment Composite [HP: 89] [LF: 0.36]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**
Emission Factors	0.02142	0.00428	528.06776	529.87995
Rollers Composite [HP: 36] [LF: 0.38]				
	CH_4	**N_2O**	**CO_2**	**CO_2e**

Emission Factors	0.02382	0.00476	587.12246	589.13732

- Vehicle Exhaust & Worker Trips Criteria Pollutant Emission Factors (grams/mile)

	VOC	SO_x	NO_x	CO	PM 10	PM 2.5	NH_3
LDGV	0.29527	0.00267	0.11165	4.04986	0.02247	0.00738	0.04860
LDGT	0.23673	0.00337	0.16162	3.66495	0.02294	0.00810	0.04069
HDGV	0.72171	0.00731	0.54907	9.00968	0.04856	0.02324	0.08587
LDDV	0.12811	0.00127	0.17995	6.34364	0.02419	0.00836	0.01652
LDDT	0.12283	0.00127	0.20975	3.17905	0.02205	0.00817	0.01622
HDDV	0.10536	0.00420	2.31601	1.53236	0.15590	0.07313	0.06704
MC	2.60666	0.00332	0.61385	11.58201	0.03150	0.02142	0.05413

- Vehicle Exhaust & Worker Trips Greenhouse Gasses Emission Factors (grams/mile)

	CH_4	N_2O	CO_2	CO_2e
LDGV	0.01489	0.00497	318.16797	319.90147
LDGT	0.01534	0.00685	402.36986	404.61328
HDGV	0.04492	0.02324	872.02208	879.43932
LDDV	0.05106	0.00070	377.22210	378.83716
LDDT	0.02794	0.00100	376.78773	377.83642
HDDV	0.02425	0.16514	1250.29254	1294.73493
MC	0.09994	0.00291	391.84214	395.41274

2.3.4 Paving Phase Formula(s)

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * EF_{POL}) / 2000$

- Construction Exhaust Emissions per Phase
$CEE_{POL} = (NE * WD * H * HP * LF * EF_{POL} * 0.002205) / 2000$

CEE_{POL}: Construction Exhaust Emissions (TONs)
NE: Number of Equipment
WD: Number of Total Work Days (days)
H: Hours Worked per Day (hours)
HP: Equipment Horsepower
LF: Equipment Load Factor
EF_{POL}: Emission Factor for Pollutant (g/hp-hour)
0.002205: Conversion Factor grams to pounds
2000: Conversion Factor pounds to tons

- Vehicle Exhaust Emissions per Phase
$VMT_{VE} = PA * 0.25 * (1 / 27) * (1 / HC) * HT$

VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)
PA: Paving Area (ft^2)
0.25: Thickness of Paving Area (ft)
(1 / 27): Conversion Factor cubic feet to cubic yards (1 yd^3 / 27 ft^3)
HC: Average Hauling Truck Capacity (yd^3)
(1 / HC): Conversion Factor cubic yards to trips (1 trip / HC yd^3)
HT: Average Hauling Truck Round Trip Commute (mile/trip)

$V_{POL} = (VMT_{VE} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Vehicle Exhaust Vehicle Miles Travel (miles)

0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Vehicle Exhaust On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Worker Trips Emissions per Phase
$VMT_{WT} = WD * WT * 1.25 * NE$

VMT_{WT}: Worker Trips Vehicle Miles Travel (miles)
WD: Number of Total Work Days (days)
WT: Average Worker Round Trip Commute (mile)
1.25: Conversion Factor Number of Construction Equipment to Number of Works
NE: Number of Construction Equipment

$V_{POL} = (VMT_{WT} * 0.002205 * EF_{POL} * VM) / 2000$

V_{POL}: Vehicle Emissions (TONs)
VMT_{VE}: Worker Trips Vehicle Miles Travel (miles)
0.002205: Conversion Factor grams to pounds
EF_{POL}: Emission Factor for Pollutant (grams/mile)
VM: Worker Trips On Road Vehicle Mixture (%)
2000: Conversion Factor pounds to tons

- Off-Gassing Emissions per Phase
$VOC_P = (2.62 * PA) / 43560 / 2000$

VOC_P: Paving VOC Emissions (TONs)
2.62: Emission Factor (lb/acre)
PA: Paving Area (ft^2)
43560: Conversion Factor square feet to acre (43560 ft2 / $acre)^2$ / acre)
2000: Conversion Factor square pounds to TONs (2000 lb / TON)

General Assumptions

-- For construction actions, the Pollutants of Concern (POC) emissions generated are overwhelmingly from off-road and on-road vehicles
-- 1 Year selected as worst-case total construction project duration

L x W = Area
2W X W = Area
$2W^2$ = Area
W = SQRT(Area/2)

Parking Lot Area = 435600 sqft

W = 466.6905 ft

10 acres = 435600 sqft

Existing Building Dimensions		
W (ft)	Ratio (L:W)	L (ft)
466.6904756	2	933.3809512

-- A length to width ratio (L:W) is 2:1 for optimal vehicle travel distance

Equation 1:

$$L = 2W$$

Where:

L	= Length of parking lot (ft)
2	= Existing building length to width ratio
W	= Width of parking lot (ft)

Site Grading

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker round trip commute (mile)
--- Equipment

Area to be Graded (ft^2)		
L (ft)	W (ft)	$Area_{Graded}$ (ft^2)
933.3809512	466.6904756	435600



Notes:

Equation 4:

$$Area_{Graded} = W \times L$$

Where:

$Area_{Graded}$	= Area of the site to be graded (ft^2)
W	= Width of building (ft)
L	= Length of building (ft)

Site Grading Material Hauled On-Site and Off-Site (ft^3)					
$Area_{Graded}$ (ft^2)	$\%_{GV}$	$Depth_{Graded}$ (ft)	Cubic Feet per Cubic Yard	$Hauled_{Graded}$ On-Site (yd^3)	$Hauled_{Graded}$ Off-Site (yd^3)
435600	100%	1	27	16133.33333	16133.33333

Notes:
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Assumed material hauled on-site is equivalent to material hauled off-site during site grading
-- Assumed 100% of trench volume during site grading will be hauled on-site and off-site
-- Site grading trench depth assumed to be 1ft

Equation 5:

$$Hauled_{Graded} = \frac{Area_{Graded} \times \%_{GV} \times Depth_{Graded}}{27}$$

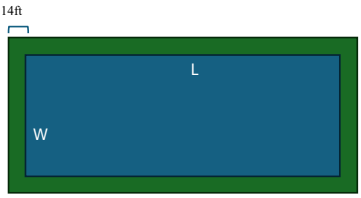
Where:

$Hauled_{Graded}$	= Volume of material hauled on-site/off-site during site grading phase (yd^3)
$Area_{Graded}$	= Area of the site to be graded (ft^2)
$\%_{GV}$	= % of trench volume during site grading that will be hauled on-site and off-site during site grading (%)
$Depth_{Graded}$	= Depth of site graded (ft)
27	= Cubic feet to cubic yard conversion (1 cubic yard = 27 cubic foot)

Excavating/Trenching

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)
--- Equipment

Excavated Area (ft^2)			
$Width_{Excavated}$ (ft)	L (ft)	W (ft)	$Area_{Excavated}$ (ft^2)
14	933.3809512	466.6904756	19796.99997



Notes:
-- Assumed 1 drainage trench will be made in the excavating/trenching phase
-- Assumed trench will consevatively be 14ft wide and run along the perimeter of the parking lot

Equation 8:

$$Area_{Excavated} = (W + Width_{Excavated}) \times (L + Width_{Excavated}) - (W \times L)$$

Where:

$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
$Width_{Excavated}$	= Total width of excavated trenches, 3 trenches at 1ft wide (ft)
L	= Length of building (ft)
W	= Width of building (ft)

Excavating Material Hauled On-Site and Off-Site (ft^3)				
$Area_{Excavated}$ (ft^2)	$Depth_{Excavated}$	Cubic Feet per Cubic Yard	$Hauling_{Excavated}$ On-Site (yd^3)	$Hauling_{Excavated}$ Off-Site (yd^3)
19796.99997	18	27	13197.99998	13197.99998

Notes:
-- Note trenches for excavation are conservatively assumed to be 18 foot deep
-- Assumed material hauled on-site is equivalent to material hauled off-site during excavation/trenching

Equation 9:

$$Hauling_{Excavated} = \frac{Area_{Excavated} \times Depth_{Excavated}}{27}$$

Where:

$Hauling_{Excavated}$	= Volume of material hauled on-site/off-site during excavating phase (yd^3)
$Area_{Excavated}$	= Area of the site to be excavated (ft^2)
$Depth_{Excavated}$	= Depth of trecnhes created during excavation/trenching site phases (ft)
27	= Cubic feet to cubic yard conversion (1 cubic yard = 27 cubic foot)

Paving (Asphalt)

Notes:
-- Default ACAM values for:
--- Average work days per week (day)
--- Haulting capacity (yd^3)
--- Hauling roundtrip commute (mile)
--- Worker commute (mile)

Area of Paving (ft^2)		
L (ft)	W (ft)	$Area_{Paving}$(ft^2)
933.3809512	466.6904756	435600

Notes:
-- Assumed entire area will be paved

Equation 10:

$$Area_{Paving} = W \times L$$

Where:

$Area_{Paving}$	= Area of the site to be paved (ft^2)
W	= Width of building (ft)
L	= Length of the building (ft)