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January 3, 2014

VIA HAND-DELIVERY AND E-FILING

El Segundo Energy Center Petition to Amend (00-AFC-14C)
Craig Hoffman, Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: El Segundo Energy Center Petition to Amend (00-AFC-14C)
Air Quality Data to Supplement Certain Responses in Data Response Set 1

Dear Mr. Hoffman:

On November 14, 2013, California Energy Commission staff requested additional data to supplement the air quality data responses El Segundo Energy Center LLC ("**ESEC LLC**") provided in Data Response Set 1 on September 12, 2013 (CEC TN# 200464). In response to staff's request, ESEC LLC hereby submits the enclosed air quality data, including modeling information on the enclosed compact disk. Please contact me or my colleague Allison Harris if there are questions about the enclosures.

Locke Lord LLP

A handwritten signature in blue ink that reads "John A. McKinsey".

By: _____
John A. McKinsey
Attorneys for El Segundo Energy Center LLC

JAM:awph

Enclosures (the compact disk will be hand-delivered)

El Segundo Energy Center Petition to Amend

(00-AFC-14C)

Air Quality Data Responses (Response to CEC Request for Supplemental Data dated November 15, 2013)

Submitted to
California Energy Commission

Prepared by
El Segundo Energy Center LLC

January 3, 2014

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Introduction

Attached are El Segundo Energy Center LLC's (ESEC LLC) responses to the California Energy Commission Staff's (Staff) November 15, 2013 request for supplemental Air Quality data related to the El Segundo Energy Center (ESEC) Petition to Amend (00-AFC-14C).

Supplemental Air Quality Data Response

On November 14, 2013 the California Energy Commission (“CEC”) Staff requested additional information regarding the demolition/construction air quality impact analysis performed as part of the El Segundo Energy Center Petition to Amend (00-AFC-14C) (the “Proposed Project”)(see CEC TN # 201221, filed November 15, 2013). The following is the response of El Segundo Energy Center LLC (“ESEC LLC”) to this request for supplemental data.

DATA REQUEST

AQ-1: Staff is looking at the construction emissions estimation for El Segundo (provided in data response set one, TN # 200464, dated Sept. 12, 2013, and an accompanying CD with a CalEEMod input spreadsheet). Table 3.1D-6R shows the maximum daily onsite fugitive dust was estimated to be 0.77 lbs/day for PM10 and 0.12 lbs/day for PM2.5, which were used as inputs for fugitive dust impacts analysis. Staff is trying to understand why the onsite fugitive dust emissions were only estimated for the demolition phase (first 6 months) and why the onsite fugitive dust emissions would be zero for the remaining 24 months. The CalEEMod input spreadsheet didn’t include information for dust from material movement (i.e. grading, bulldozing, or truck loading) in the ‘tblGrading’ worksheet. Staff would like to know if there will be any grading, bulldozing, or truck loading onsite. Staff would also like to know if there will be any truck traveling on unpaved roads on the project site. If there will be such activities onsite, staff will need emissions estimation associated with these activities. Staff will also need a revised construction impacts analysis to be consistent with any revised emissions estimation.

Response: As discussed in Section 3.1.4.1 of the April 2013 El Segundo Energy Center Amendment Petition to Amend (00-AFC-14C) and in the responses to Data Request Numbers 14 – 17 provided in ESEC LLC’s Data Response Set 1 dated September 12, 2013 (TN # 200464) (“Data Response Set 1”), the CalEEMod model was used to calculate demolition and construction emissions for the Proposed Project. In addition, as discussed in Data Response Number 3 of Data Response Set 1, the demolition phase of the Proposed Project is expected to occur during Months 1 through 6, the construction phase is expected to occur during Months 7 through 26, and the commissioning phase is expected to occur during Months 27 through 30. Therefore, in the CalEEMod model runs performed as part of Data Response Set 1, four CalEEMod model phase types were used, as shown below.

- Months 1 through 6: CalEEMod phase type set to “demolition;”
- Months 7 through 24: CalEEMod phase type set to “building construction;”
- Month 25: CalEEMod phase type set to “paving;” and
- Months 26 through 30: CalEEMod phase type set to “architectural coating.”

The “building construction” phase type was used for Months 7 through 24 because installing foundations, erecting structures, and installing equipment are the main activities expected to occur during these months; which matches the activities listed in the “building construction” phase type definition in the CalEEMod user manual.¹ When the “building construction” phase type is selected, the CalEEMod model does not calculate fugitive dust emissions, regardless of the type of construction equipment identified for the period in

¹ California Emissions Estimator Model (CalEEMod) User’s Guide, Section 4.3.1.

question. CalEEMod only calculates fugitive dust emissions if the phase types “demolition,” “site preparation,” or “grading” are selected.

After examining the type of construction equipment that is expected to be onsite during Months 7 through 24 (see enclosed Table 3.1D-8R), it is likely that there will be fugitive dust generated by equipment such as dozers and graders. Therefore, ESEC LLC has revised the demolition/construction analysis by changing the CalEEMod phase type for Months 7 through 24 from “building construction” to “grading.” The “grading” phase type was selected because the CalEEMod user manual definition for this term more closely matches the expected activities during Months 7 through 24 than “demolition” or “site preparation.” As shown on enclosed Table 3.1D-8R, following Month 24, the onsite construction equipment is mainly associated with paving and/or architectural coating activities. Therefore, the CalEEMod phase types listed above for these months remain unchanged for the revised analysis.

To respond to the CEC Staff question regarding emissions for onsite worker/truck travel during the demolition/construction phase of the Proposed Project, ESEC LLC examined how the CalEEMod model accounts for worker/truck travel emissions. While the CalEEMod model calculates both combustion and paved road travel fugitive dust emissions for workers and truck hauling or deliveries, all of these travel emissions are assumed to occur offsite. Because a portion of this travel is expected to occur on the Proposed Project site due to worker and/or truck travel on the Proposed Project’s access road, ESEC LLC revised its demolition/construction analysis to account for these onsite emissions. This was done by assuming an onsite roundtrip travel distance of 0.5 mile for each worker or truck trip² and manually allocating a portion of the offsite travel emissions to onsite travel. For example, to estimate offsite vehicle combustion/paved road travel dust emissions for worker vehicle travel, the CalEEMod model assumes a travel distance of 14.7 miles. A factor of 0.5/14.7 was used to convert a portion of the offsite worker travel emissions (combustion/paved road dust emissions) into onsite travel emissions. This same onsite travel distance of 0.5 mile was used to convert a portion of the offsite truck delivery/hauling emissions into onsite travel emissions. Because nearly all of the onsite travel by workers and delivery trucks will be done on paved surfaces (paved access roads and paved parking areas), onsite unpaved travel by workers and delivery trucks is expected to be minimal. The manually calculated onsite worker/delivery truck emission estimates are shown in enclosed Table 3.1D-5R, with combustion travel emissions referred to as “on-site vehicle” and fugitive dust travel emissions referred to as “fugitive (on-site vehicle).”

Finally, the revised demolition/construction analysis was performed using the most current version of the CalEEMod model (Version 2013.2.2) that was released on October 2, 2013, including the use of the CalEEMod load factors for the onsite construction equipment. The use of the newest version of the CalEEMod model along with the current CalEEMod load factors resulted in a decrease in the estimated onsite construction equipment combustion emissions.

The revised demolition/construction emission estimates are shown in the tables in Attachment DR14-1 of this response, with changes shown in strikethrough and underline format. The updated CalEEMod model input spreadsheet and output results are included in the enclosed compact disc.

New ambient impact modeling has been performed based on the revised demolition/construction emission estimates. The modeling results are summarized in Table 3.1-22R of Attachment DR14-1 below. Table 3.1-22R shows that the modeling of the revised demolition/construction emissions does not change any of the conclusions discussed in the PTA or in the updated demolition/construction impact analysis submitted to the CEC Staff on September 23, 2013 (as TN# 200666). These conclusions are that while for some

² Based on traveling on the paved access road from the public street to the paved parking area located in the tank farm area.

pollutants/averaging periods the modeled impacts are potentially significant, mitigation measures will be used to minimize emissions and the Proposed Project's demolition/construction emission ambient impacts are not expected to cause new exceedances of any state or federal air quality standard).

Attachment DR14-1: Revised Demolition/Construction Emissions Calculations and Support Data Tables
(See Attached Tables)

Table 3.1D-1R (Updated December 26, 2013)
Daily and Annual Construction Emissions

Daily Construction Emissions (peak month)						
(lbs/day)						
	NOx	CO	VOC	SOx	PM10	PM2.5
Onsite						
Off-Road Equipment (Combustion)	185.56 116.45	219.33 137.85	9.37 5.78	0.41 0.27	8.00 5.44	8.00[±] 5.44
On-Site Vehicles (Combustion)	0.20	1.49	0.11	0.00	0.01	0.01
Off-Road Equipment - Fugitive Dust					0.77 4.90	0.12 2.60
On-Site Vehicles - Fugitive Dust					0.39	0.10
Subtotal (On-Site)	185.56 116.65	219.33 139.34	9.37 5.89	0.41 0.27	8.77 10.74	8.12[±] 8.15
Offsite						
Worker Travel (Combustion)	5.17	58.80	22.31 3.82	0.14	0.09	0.08
Truck Emissions (Combustion)	2.66	3.59	0.49 0.27	0.01	0.04	0.04
Hauling Emissions (Combustion)	5.16 4.91	4.03 3.84	0.70 0.31	0.01	0.08	0.07
Worker Travel - Fugitive Dust					11.18	2.96
Truck - Fugitive Dust					0.19	0.05
Hauling - Fugitive Dust					4.88 0.30	1.21 0.08
Subtotal (Offsite)	12.99 12.74	66.42 66.22	23.50 4.41	0.16 0.16	16.45 11.87	4.42 3.29
Total	198.54 129.39	285.74 205.56	32.87 10.30	0.57 0.43	25.22 22.61	12.54[±] 11.45

Peak Annual Construction Emissions (tons/yr, rolling 12-month maximum)						
	NOx	CO	VOC	SOx	PM10	PM2.5
Onsite						
Off-Road Equipment (Combustion)	21.77 13.77	25.75 16.24	1.09 0.69	0.05 0.03	0.93 0.62	0.93[±] 0.62
On-Site Vehicles (Combustion)	0.03	0.21	0.01	0.00	0.00	0.00
Off-Road Equipment - Fugitive Dust					0.05 0.47	0.01 0.25
On-Site Vehicles - Fugitive Dust					0.04	0.01
Subtotal (On-Site)	21.77 13.80	25.75 16.45	1.09 0.70	0.05 0.03	0.98 1.14	0.94[±] 0.89
Offsite						
Worker Travel (Combustion)	0.61	6.38	2.24 0.42	0.02	0.01	0.01
Truck Emissions (Combustion)	0.19	0.24	0.03 0.02	0.00	0.00	0.00
Hauling Emissions (Combustion)	0.32 0.31	0.24	0.04 0.02	0.00	0.00	0.00
Worker Travel - Fugitive Dust					1.26	0.33
Truck - Fugitive Dust					0.01	0.00
Hauling - Fugitive Dust					0.31 0.02	0.08 0.01
Subtotal (Offsite)	1.12 1.11	6.86	2.31 0.45	0.02	1.60 1.31	0.43 0.36
Total	22.89 14.92	32.61 23.31	3.40 1.16	0.07 0.05	2.57 2.44	1.37[±] 1.25

Table 3.1D-2R (Updated December 26, 2013)
Modeled Emissions – Short Term Impacts

Short Term Impacts (24 hours and less)					
	NOx	CO	SOx	PM10	PM2.5
TOTAL					
Off Road Equipment					
Off-Road Equipment and On-Site Vehicles (Combustion) (lbs/day)	<u>185.56</u>	<u>219.33</u>	<u>0.41</u>	<u>9.37</u>	<u>8.00</u>
	<u>116.65</u>	<u>139.34</u>	<u>0.27</u>	<u>5.45</u>	<u>5.45</u>
Off Road Equipment					
Off-Road Equipment and On-Site Vehicles (Combustion) (hrs/day)	8	8	8	8	8
Off Road Equipment					
Off-Road Equipment and On-Site Vehicles (Combustion) (lbs/hr)	<u>23.19</u>	<u>27.42</u>	<u>0.05</u>	<u>1.17</u>	<u>1.00</u>
	<u>14.58</u>	<u>17.42</u>	<u>0.03</u>	<u>0.68</u>	<u>0.68</u>
Off Road Equipment					
Off-Road Equipment and On-Site Vehicles (Combustion) (g/sec)	<u>2.92</u>	<u>3.45</u>	<u>0.01</u>	<u>0.15</u>	<u>0.13</u>
	<u>1.84</u>	<u>2.19</u>	<u>0.0004</u>	<u>0.09</u>	<u>0.09</u>
Off-Road Equipment and On-Site Vehicles (Fugitive Dust) (lbs/day)				<u>0.77</u>	<u>0.12</u>
				<u>5.29</u>	<u>2.71</u>
Off-Road Equipment and On-Site Vehicles (Fugitive Dust) (hrs/day)				8	8
Off-Road Equipment and On-Site Vehicles (Fugitive Dust) (lbs/hr)				<u>0.10</u>	<u>0.01</u>
				<u>0.66</u>	<u>0.34</u>
Off-Road Equipment and On-Site Vehicles (Fugitive Dust) (g/sec)				<u>0.01</u>	<u>0.00</u>
				<u>0.08</u>	<u>0.04</u>

Table 3.1D-3R (Updated December 26, 2013)

Modeled Emissions - Long-Term Impacts

Long Term Impacts (annual)					
	NOx	CO	SOx	PM10	PM2.5
TOTAL					
Off Road Equipment					
<u>Off-Road Equipment and On-Site Vehicles</u> (Combustion) (tons/yr)	<u>21.77</u>	<u>25.75</u>	<u>0.05</u>	<u>0.93</u>	<u>0.93</u>
Off Road Equipment					
<u>Off-Road Equipment and On-Site Vehicles</u> (Combustion) (days/yr)	<u>262</u>	<u>262</u>	<u>262</u>	<u>262</u>	<u>262</u>
Off Road Equipment					
<u>Off-Road Equipment and On-Site Vehicles</u> (Combustion) (hrs/day)	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>	<u>8</u>
Off Road Equipment					
<u>Off-Road Equipment and On-Site Vehicles</u> (Combustion) (lbs/hr)	<u>20.77</u>	<u>24.57</u>	<u>0.05</u>	<u>0.89</u>	<u>0.89</u>
Off Road Equipment					
<u>Off-Road Equipment and On-Site Vehicles</u> (Combustion) (g/sec)	<u>2.62</u>	<u>3.10</u>	<u>0.01</u>	<u>0.11</u>	<u>0.11</u>
	<u>1.66</u>	<u>1.98</u>	<u>0.004</u>	<u>0.07</u>	<u>0.07</u>
<u>Off-Road Equipment and On-Site Vehicles</u> (Fugitive Dust) (tons/yr)				<u>0.05</u>	<u>0.01</u>
<u>Off-Road Equipment and On-Site Vehicles</u> (Fugitive Dust) (days/yr)				<u>262</u>	<u>262</u>
<u>Off-Road Equipment and On-Site Vehicles</u> (Fugitive Dust) (hrs/day)				<u>8</u>	<u>8</u>
<u>Off-Road Equipment and On-Site Vehicles</u> (Fugitive Dust) (lbs/hr)				<u>0.04</u>	<u>0.01</u>
<u>Off-Road Equipment and On-Site Vehicles</u> (Fugitive Dust) (g/sec)				<u>0.01</u>	<u>0.00</u>
				<u>0.06</u>	<u>0.03</u>

Table 3.1D-4R (Updated December 26, 2013)
Greenhouse Gas Emission Calculations

Construction GHG Emissions (MT, Total for 26-month Demolition/Construction Period)				
	CO2	CH4	N2O	CO2e
Off-Road Equipment	5858.23 <u>3854.17</u>	1.46 <u>0.89</u>	0.00	5888.86 <u>3872.95</u>
<u>On-Site Vehicles</u>	<u>70.76</u>	<u>0.01</u>	<u>0.00</u>	<u>70.86</u>
Worker Travel	1875.88	0.10	0.00	1877.94
Truck Emissions	71.10	0.00	0.00	71.11
Hauling Emissions	73.96 <u>73.34</u>	0.00	0.00	73.97 <u>73.36</u>
Total	7879.16 <u>5945.28</u>	1.56 <u>1.00</u>	0.00	7911.88 <u>5966.22</u>

Table 3.1D-7R (Updated December 26, 2013)**CalEEMod Input Data****For the revised 30-month Construction Schedule**

CalEEMod Phase Name	Phase Type	Start Date	End Date	# day/Week	Number of Days	Daily hours	Month
Demolition 1	Demolition	2016/01/01	2016/01/31	5	21	8	1
Demolition 2	Demolition	2016/02/01	2016/02/29	5	21	8	2
Demolition 3	Demolition	2016/03/01	2016/03/31	5	23	8	3
Demolition 4	Demolition	2016/04/01	2016/04/30	5	21	8	4
Demolition 5	Demolition	2016/05/01	2016/05/31	5	22	8	5
Demolition 6	Demolition	2016/06/01	2016/06/30	5	22	8	6
Building Construction 7	Building Construction <u>Grading</u>	2016/07/01	2016/07/31	5	21	8	7
Building Construction 8	Building Construction <u>Grading</u>	2016/08/01	2016/08/31	5	23	8	8
Building Construction 9	Building Construction <u>Grading</u>	2016/09/01	2016/09/30	5	22	8	9
Building Construction 10	Building Construction <u>Grading</u>	2016/10/01	2016/10/31	5	21	8	10
Building Construction 11	Building Construction <u>Grading</u>	2016/11/01	2016/11/30	5	22	8	11
Building Construction 12	Building Construction <u>Grading</u>	2016/12/01	2016/12/31	5	22	8	12
Building Construction 13	Building Construction <u>Grading</u>	2017/01/01	2017/01/31	5	22	8	13
Building Construction 14	Building Construction <u>Grading</u>	2017/02/01	2017/02/28	5	20	8	14
Building Construction 15	Building Construction <u>Grading</u>	2017/03/01	2017/03/31	5	23	8	15
Building Construction 16	Building Construction <u>Grading</u>	2017/04/01	2017/04/30	5	20	8	16
Building Construction 17	Building Construction <u>Grading</u>	2017/05/01	2017/05/31	5	23	8	17
Building Construction 18	Building Construction <u>Grading</u>	2017/06/01	2017/06/30	5	22	8	18
Building Construction 19	Building Construction <u>Grading</u>	2017/07/01	2017/07/31	5	21	8	19
Building Construction 20	Building Construction <u>Grading</u>	2017/08/01	2017/08/31	5	23	8	20
Building Construction 21	Building Construction <u>Grading</u>	2017/09/01	2017/09/30	5	21	8	21
Building Construction 22	Building Construction <u>Grading</u>	2017/10/01	2017/10/31	5	22	8	22
Building Construction 23	Building Construction <u>Grading</u>	2017/11/01	2017/11/30	5	22	8	23
Building Construction 24	Building Construction <u>Grading</u>	2017/12/01	2017/12/31	5	21	8	24
Paving 25	Paving	2018/01/01	2018/01/31	5	23	8	25
Architectural Coating 26	Architectural Coating	2018/02/01	2018/02/28	5	20	8	26
Commissioning 27	Architectural Coating	2018/03/01	2018/03/31	5	22	8	27
Commissioning 28	Architectural Coating	2018/04/01	2018/04/30	5	21	8	28
Commissioning 29	Architectural Coating	2018/05/01	2018/05/31	5	23	8	29
Commissioning 30	Architectural Coating	2018/06/01	2018/06/30	5	21	8	30

Table 3.1D-8R (Updated December 26, 2013) (cont.)

					Month																																
CalEEMod INPUT	HP	Load Factor	hrs/day	days/wk	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30			
CalEEMod Equipment Type																																					
Cranes	226	0.29	8	5	0	4	4	0	0	0																											
Crushing/Proc. Equipment	85	0.78	8	5	0	0	0	0	0	0																											
Dumpers/Tenders	16	0.38	8	5	4	8	8	11	6	19																											
Excavators	162	0.38	8	5	3	3	4	6	6	0																											
Off-Highway Trucks	400	0.38	8	5	1	1	1	1	1	1																											
Plate Compactor	8	0.43	8	5	0	0	0	1	0	0																											
Rubber Tired Loaders	199	0.36	8	5	1	1	1	1	1	2																											
Skid Steer Loaders	64	0.37	8	5	2	2	2	2	2	2																											
Tractors/Loaders/Backhoes	97	0.37	8	5	2	3	3	3	3	1																											
Air Compressors	78	0.75	0.48	8	5						0	3	3	5	5	8	11	13	16	16	16	16	16	16	10	10	9	3	1	0	0	0	0	0	0		
Cement and Mortar Mixers	9	0.5	0.56	8	5						0	2	2	5	5	6	6	6	6	6	5	5	4	2	2	0	0	0	0	0	0	0	0	0			
Cranes	350	0.7	0.29	8	5						0	0	0	0	0	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0				
Cranes	250	0.7	0.29	8	5						0	0	1	1	2	2	2	2	2	2	2	2	2	2	2	1	1	0	0	0	0	0	0				
Cranes	185	0.5	0.29	8	5						0	1	1	3	3	4	4	4	4	4	3	3	3	2	2	1	1	0	0	0	0	0	0				
Cranes	185	0.5	0.29	8	5						0	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0				
Dumpers/Tenders	16	0.5	0.38	10	5						2	2	2	2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Excavators	200	0.8	0.38	8	5						1	1	1	1	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Excavators	140	0.8	0.38	8	5						1	1	2	2	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Excavators Graders	150	0.9	0.41	8	5						1	1	1	1	1	1	0	0	0	0	0	0	0	0	0	1	1	1	1	1	0	0	0	0			
Off-Highway Trucks	400	0.5	0.38	8	5						0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0			
Off-Highway Trucks	210	0.5	0.38	8	5						0	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0			
Off-Highway Trucks	400	0.5	0.38	8	5						0	1	1	2	2	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	0	0	0	0	0		
Off-Highway Trucks	180	0.65	0.38	8	5						1	1	3	3	3	3	3	3	3	3	3	3	2	2	0	0	0	0	0	0	0	0	0	0	0		
Off-Highway Trucks	180	0.8	0.38	8	5						3	3	4	4	4	4	4	4	4	4	4	4	4	4	4	4	3	3	2	1	0	0	0	0	0		
Paving Equipment	102	0.85	0.36	8	5						0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2	2	0	0	0	0	0		
Plate Compactors	145	0.65	0.43	8	5						1	1	1	1	1	1	1	1	1	1	1	1	1	0	0	1	1	1	1	1	0	0	0	0	0		
Pumps	190	0.6	0.74	8	5						0	1	2	3	3	3	3	3	3	3	3	3	3	2	1	1	0	0	0	0	0	0	0	0	0		
Rubber Tired Dozers	285	0.7	0.4	8	5						1	1	2	2	2	2	2	2	2	1	1	1	1	1	0	0	1	1	1	1	1	0	0	0	0		
Tractors/Loaders/Backhoes	84	0.75	0.37	8	5						1	1	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1	1	1	1	0	0	0	0		
Welders	23	0.75	0.45	8	5						0	0	1	1	1	3	3	5	5	6	6	6	6	6	6	4	3	1	0	0	0	0	0	0	0		

Table 3-1.22R (Updated December 26, 2013)
Modeled Maximum Impacts During Construction

Pollutant	Averaging Period	Maximum Predicted Impact ($\mu\text{g}/\text{m}^3$)	Maximum Background Concentration ($\mu\text{g}/\text{m}^3$)	Total Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	CAAQS ($\mu\text{g}/\text{m}^3$)
NO ₂	1 hr	229.1 172.0	184.2	287.9 245.4	--	339
	Fed 1 hr	229.1 172.0	129.7	240.5 210.8	188	--
	Annual	28.5 18.1	24.5	53.0 42.6	100	57
SO ₂	1 hr	2.4 1.6	67.6	70.0 69.2	196	655
	3 hr	1.2 0.8	41.6	42.8 42.4	1300	--
	24 hr	0.3 0.2	15.8	16.1 16.0	--	105
CO	1 hr	1,276 810.9	3,250	4,526 4,061	40,000	23,000
	8 hr	493 313.3	2,433	2,926 2,746	10,000	20,000
PM ₁₀	24 hr	7.6 8.0	52	60	150	50
	Annual	1.3 1.5	25.6	26.9 27.1	--	20
PM _{2.5}	24 hr	7.6 6.1	30	37.6 36.1	35	--
	Annual	1.3 1.2	12.8	14.1 14	12.0	12