# PART 2, CHAPTER 19

# AIR QUALITY

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# PART 2, CHAPTER 19

# AIR QUALITY

## **19.1 OVERVIEW**

Pursuant to 23 United States Code (U.S.C.) § 327 and the implementing Memorandum of Understanding (MOU) executed on December 14, 2016, the Florida Department of Transportation (FDOT) has assumed Federal Highway Administration's (FHWA's) responsibilities under the National Environmental Policy Act (NEPA) for highway projects on the State Highway System (SHS) and Local Agency Program (LAP) projects off the SHS. In general, FDOT's assumption includes all highway projects in Florida whose source of federal funding comes from FHWA or which constitute a federal action through FHWA. This includes responsibilities for environmental review, interagency consultation and other activities pertaining to the review or approval of NEPA actions. Consistent with law and the MOU, FDOT will be the Lead Federal Agency for highway projects with approval authority resting in the Office of Environmental Management (OEM).

### 19.1.1 Purpose

This chapter describes how to evaluate the air quality effects of transportation projects. The chapter explains FDOT's process to address existing air quality conditions within the region where a project is located; how to evaluate project specific air quality effects; and, if necessary, how to address those effects.

Motor vehicle pollutant emissions from the combustion of fossil fuels have long been tied to Air Quality. The primary air pollutants associated with highway motor vehicles are Carbon Monoxide (CO), Nitrogen Oxides (NOX), Volatile Organic Compounds (VOC), and to a lesser degree Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Emissions of NOX and VOC also contribute to the formation of ozone, the primary component of what is commonly referred to as smog. Vehicle emission standards and continued improvement in traffic flow have reduced fleet-wide pollutant emissions over the past several decades.

FDOT's analysis of air quality effects is based on the local area's attainment status for each **National Ambient Air Quality Standards (NAAQS)** as detailed in <u>Section</u> <u>19.1.3.1</u>. It is not necessary to prepare an extensive report to document potential impacts to air quality. Rather, a brief **Air Quality Technical Memorandum** is prepared and placed in the project file, and the results documented in the Environmental Document for the project as well.

### 19.1.2 Definitions

**Averaging Time** – The time increments over which pollutant concentrations are measured and on which pollutant standards are based. Ambient air quality standards are

specified based on the concentration of a pollutant over specific time periods, such as 1hour, 8-hour, 24-hour, or one year. The different averaging times and concentrations are designed to protect against different exposure effects.

**Budget** – The estimated amount of air pollution that can occur in a particular area within a specific amount of time without causing a violation of the ambient air quality standards.

**Project Level (Hot Spots) Analysis** – Refers to a modeling analysis used to estimate localized concentrations of one or more criteria pollutants that may exceed the national ambient air quality standards.

Primary Standards – Ambient air pollution standards set to protect public health.

**Secondary Standards** – Ambient air pollution standards set to protect public welfare, such as protecting against visibility degradation and damage to animals, crops, vegetation, and buildings.

### 19.1.3 Clean Air Act

The *Clean Air Act (CAA)* as enacted in 1967, focused on technical information associated with air pollution, including research, grants, and the abatement of interstate air pollution issues. In 1970, the *CAA* was amended and the *NAAQS* were established to protect public health and welfare. The 1970 Amendments also required states to prepare and implement control plans to achieve the *NAAQS*. In 1990, the *CAA* was amended to include strategies to achieve and maintain the criteria air pollutant *NAAQS*, to reduce air pollutant and pollutant precursor emissions from mobile sources, and to provide enforcement sanctions for not achieving and maintaining the *NAAQS*.

### **19.1.3.1** National Ambient Air Quality Standards

In 1970, the Environmental Protection Agency (EPA) Office of Air Quality Planning and Standards (AQPS) established primary (to protect public health) and secondary (to protect public welfare) **NAAQS** for six pollutants. These pollutants are referred to as the **criteria air pollutants**: ozone, nitrogen dioxide, particulate matter, sulfur oxides, carbon monoxide, and lead. The current standards are provided in <u>Table 19-1</u>. The **NAAQS** show the maximum allowable concentration of a pollutant by averaging time. For example, the maximum allowable primary and secondary ambient concentration of ozone is 0.070 parts per million (ppm), averaged over an 8-hour period. The **criteria air pollutants** are described below (see <u>Figure 19-1</u> for more information):

### 19.1.3.1.1 Ozone

Ozone is not usually emitted directly into the air. At ground level, ozone is created by a chemical reaction between oxides of nitrogen and volatile organic compounds in the presence of sunlight. Motor vehicle exhaust and industrial emissions, gasoline vapors, and chemical solvents as well as natural sources emit oxides of nitrogen and volatile

organic compounds. While ozone typically occurs at a regional level, no methodology currently exists to determine ozone emissions at the project level.

## 19.1.3.1.2 Nitrogen Dioxide

Nitrogen oxides are a group of highly reactive gases. One of these gases, nitrogen dioxide, along with particles in the air, is often seen as a reddish brown layer over urban areas. The primary sources of nitrogen oxides are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuel. Motor vehicles emit approximately 49 percent of the national level of nitrogen oxides (*EPA-456/F-98-005, 1998*).

### **19.1.3.1.3 Particulate Matter**

Particulate matter is a term used to describe particles in the air including dust, dirt, soot, smoke, and liquid droplets. Sources that directly emit particulate matter include motor vehicles, construction activities, and unpaved roads. Particles that form in the air from chemical processes involving sunlight and water vapor include fuel combustion in motor vehicles and at power plants, and industrial processes. Particulate matter is of interest because diesel vehicles emit high levels of the pollutant and diesel particulate has been identified as a probable carcinogen (cancer causing substance) by the EPA.

There are two standards for particulate matter – one for "coarse" particles (those 10 microns or less in size –  $PM_{10}$ ) and one for "fine" particles (those 2.5 microns or less in size –  $PM_{2.5}$ ). Coarse particles are typically formed by earth-based materials (brake and tire wear) that contribute to particles of this size. Fine particles are a product of combustion.

## 19.1.3.1.4 Sulfur Dioxide

Sulfur dioxide belongs to a family of Sulfur Oxide gases. Approximately 65 percent of the sulfur dioxide released in to the air comes from electric utilities. Locomotives, large ships, and some non-road diesel equipment currently burn high sulfur fuel and emit sulfur dioxide. Overall, on-road motor vehicles are not considered a significant source of sulfur dioxide.

## 19.1.3.1.5 Carbon Monoxide

Carbon monoxide is a colorless, odorless gas that is formed when carbon in fossil fuels is not burned completely. It is a component of motor vehicle exhaust, which contributes approximately 56 percent of carbon monoxide emissions nationally.

### 19.1.3.1.6 Lead

Although lead is a naturally occurring metal, motor vehicles were historically the major source of lead emissions. However, due to a phase out of leaded gasoline in the 1970s, metals processing is currently the major source of lead emissions.

### 19.1.3.1.7 National Ambient Air Quality Standards Designations

In accordance with the **CAA**, all areas within the United States are designated with respect to the **NAAQS** as being "attainment," "non-attainment," "maintenance," or "unclassifiable." An area with air quality better than the **NAAQS** is designated attainment; an area with air quality conditions worse than the **NAAQS** is designated non-attainment. Maintenance areas are non-attainment areas that have been re-designated to attainment status. Current information on the status of non-attainment areas with respect to the **NAAQS** is available within **EPA's Green Book (U.S. EPA, 2016)**.

	Pollutant	Averaging Time	Primary <sup>e</sup>	Secondary <sup>f</sup>
Ozone		8-hour <sup>a</sup>	0.070 ppm <sup>g</sup>	0.070 ppm
Nitrogon Di	ovido	1-hour <sup>b</sup>	100 ppb <sup>h</sup>	NA
Nitrogen Dioxide		Annual Arithmetic Mean	0.053 ppm	0.053 ppm
	2.5 microns or less	24-hour	35 µg/m³	35 µg/m³
Particulate Matter	in size	Annual Arithmetic Mean <sup>c</sup>	15.0 µg/m³	
	10 microns or less in size	24-hour	150 µg/m³	NA
		1-hour	75 ppb	NA
Sulfur Ovid	aad	3-hour	NA	0.5 ppm
Sulfur Oxides"		24-hour	0.14 ppm	NA
		Annual Arithmetic Mean	0.030 ppm	NA
Carbon Mo	oovido	1-hour <sup>a</sup>	35 ppm	NA
		8-hour <sup>a</sup>	9 ppm	NA
Load		Calendar Quarter	1.5 µg/m³	1.5 µg/m³
Leau		Rolling 3-Month Average	0.15 µg/m³	0.15 µg/m³

#### Table 19-1 National Ambient Air Quality Standards (NAAQS)

<sup>a</sup> The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard.

<sup>b</sup> To attain the 1-hour standard, the 3-year average of the annual 98<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb.

<sup>c</sup> To attain this primary standard, the 3-year average of the annual arithmetic mean concentrations from single or multiple community-oriented monitors must not exceed 12.0 µg/m<sup>3</sup>.

<sup>d</sup> To attain the 1-hour standard, the 3-year average of the annual 99<sup>th</sup> percentile of the 1-hour daily maximum concentrations at each site must not exceed 75ppb.

<sup>e</sup> Primary standards are designed to establish limits to protect public health, including the health of "sensitive" individuals such as asthmatics, children, and the elderly.

<sup>f</sup> Secondary standards set limits to protect public welfare including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

<sup>g</sup> ppm = parts per million

<sup>h</sup> ppb = parts per billion

NA = Not applicable ppm = parts per million ppb = parts per billion µg/m<sup>3</sup> = microgram per cubic meter

Source: United States Environmental Protection Agency, 2016

## **19.1.3.2** State Implementation Plans

The control plans that States prepare to address how they will achieve the **NAAQS** are known as **State Implementation Plans (SIPs)**. **SIPs** are prepared for all areas designated non-attainment for the **NAAQS**. They are **not prepared** for areas **designated attainment or unclassifiable**. Maintenance plans detail how an area will maintain ambient levels of pollutants below the **NAAQS** once attaining a standard. **SIPs** (which can include maintenance plans) for the EPA's Region 4 (in which the state of Florida is located) that are or have been designated non-attainment for any of the **NAAQS** can be found on the EPA's website. A web link to these documents is provided in <u>Figure 19-1</u>.

Pursuant to **Section 176** of the **CAA (42 USC § 7506)** no department, agency, or instrumentality of the federal government shall engage in, support in any way or provide financial assistance for, license or permit, or approve, any activity that does not conform to an approved **SIP**.

Conformity to a *SIP* means conforming to a *SIPs* purpose of eliminating or reducing the severity and number of violations of and achieving expeditious attainment of the *NAAQS*. FDOT complies with the *CAA* and *SIPs* by requiring that projects meet the standards described in this chapter and the EPA's transportation conformity requirements.

## **19.1.3.3** Transportation Conformity

In 1993, the EPA promulgated two sets of regulations to implement **Section 176 of the CAA.** These are referred to as the **Transportation Conformity and General Conformity Regulations.** The Transportation Conformity Regulations [40 Code of Federal **Regulations (CFR) Part 93A]** apply to transportation (highway) plans, programs, and projects within non-attainment or maintenance areas that are developed, funded, or approved under either **Title 23** or **Title 49 United States Code**. The **General Conformity Regulations** are applicable to all other federal actions (40 CFR Part 93B).

A transportation conformity determination shows that the estimated pollutant/precursor emissions associated with highway plans or programs are within the emission budgets specified in a *SIP* or Maintenance Plan. Metropolitan Planning Organizations (MPOs) typically perform and make the initial conformity determinations in metropolitan areas while state Departments of Transportation (DOTs) typically do so in rural areas. The initial conformity determinations become final upon approval by either FHWA or the Federal Transit Administration (FTA). Under the *NEPA MOU*, final conformity determinations continue to be the responsibility of FHWA and FTA.

Transportation conformity determinations are made at least every three years or, when Long-Range Transportation Plans (LRTPs) and Transportation Improvement Plans (TIPs) are updated. Transportation conformity determinations are made using estimates of the regional amount of an applicable pollutant/precursor emission for a TIP (the entire transportation network within a non-attainment or maintenance area) and forecast highway/transit operating conditions (volume and speed). If the projected emissions for a

TIP do not exceed the emission budget for this type of activity, the TIP can be found to conform to a *SIP*.

In areas designated non-attainment or maintenance for carbon monoxide and/or particulate matter, additional project level (hot spot) analysis may be necessary to determine project-level conformity. These projects must also come from a currently conforming TIP. There have been no areas within the State of Florida designated non-attainment for either carbon monoxide or the current particulate matter standards (for PM<sub>10</sub> or less in size or PM<sub>2.5</sub> or less in size).

### **19.1.3.4** National Environmental Policy Act

Project-level air quality analysis is performed as part of the **NEPA** process to identify project-related impacts, and to evaluate possible mitigation, if appropriate. The analysis performed as part of the environmental review process in **NEPA** is not required in order to determine conformance in an area designated as non-attainment or maintenance for any of the **NAAQS**.

The main difference between the analysis performed for the **CAA** (conformity) and the analysis performed for **NEPA** is that the analysis for the **CAA** is based on a comparison of predicted levels (with and without proposed improvements) while the analysis for **NEPA** estimates pollutant emissions/concentrations in the vicinity of a proposed project for direct comparison with the **NAAQS**.

Another key difference between analysis performed for the **CAA** (conformity) and the analysis performed for **NEPA** is that the **NEPA MOU** requires that final conformity determinations under the **CAA** continue to be the responsibility of FHWA and FTA. If no conformity determination is necessary for the project, the **NEPA** analysis for the **CAA** is the responsibility of FDOT.

## **19.2 PROCEDURE**

Both the **CAA** and **NEPA** require that air quality be considered in the preparation of Environmental Documents. The **CAA** requires that transportation (motor vehicle-related) projects proposed in non-attainment areas that require federal participation (e.g., approval, licensing, funding) conform to a **SIP**, if there are provisions in the **SIP** for transportation conformity. Both the **SIP** and **NEPA** require that project-related (hot-spot) impacts in all areas (attainment and non-attainment) be discussed, and if applicable, mitigation measures considered.

## **19.2.1 ETDM Screening**

Evaluation of project effects on air quality starts during the Efficient Transportation Decision Making (ETDM) screening for qualifying projects. As part of the Preliminary Environmental Discussion (PED), the Project Manager works with the District Air Quality Specialist to identify air quality issues within the project area to determine if an air quality screening will occur. During the Planning and Programming Screens of the ETDM process, the EPA, which is a Technical Advisory Team (ETAT) member, provides comments on air quality issues. The ETAT comments are summarized in the **Programming Screen Summary Report** for the ETDM process. For more information, refer to FDOT's <u>ETDM Manual, Topic No. 650-000-002</u>. The air quality screening results that are summarized in the Programming Screen help support the development of scope of air quality analysis for a Project Development and Environment (PD&E) Study.

## 19.2.2Air Quality Analysis

The level of air quality analysis during the PD&E Study varies according to the size of the project, existing air quality issues, and the degree of controversy regarding the project.

### **19.2.2.1 Categorical Exclusions**

Projects evaluated as Categorical Exclusions (CEs) are projects that do not involve significant environmental impacts. These types of projects typically have no effect on area-wide air quality levels, but may provide some air quality benefits on a local basis. For projects evaluated as CEs, an air quality analysis is generally not necessary. (See the *FHWA Discussion Paper: Appropriate Level of Highway Air Quality Analysis for a CE, EA/FONSI, and EIS*). See *Figure 19-1* for links to latest models [Motor Vehicle Emission Simulator (MOVES) and CAL3QHC], tools, and *NAAQS*.

If there is some question as to whether a particular project normally processed as a CE would have an air quality impact, a screening test should be performed in accordance with <u>Section 19.2.2.3.1</u>. If the analysis indicates that the project will not create a new violation or exacerbate an existing exceedance of the carbon monoxide standard, the project may be processed as a CE.

### **19.2.2.2** Environmental Assessment

Environmental Assessments (EAs) are prepared when the significance of environmental impacts associated with a project are unknown. In general a simplified analysis procedure is adequate for most EA projects. **Low volume roads in rural areas do not require any analysis to** determine air quality impacts. Air quality analysis for EAs for other roads are done qualitatively using a knowledge of similar projects. However, if the predicted CO concentrations exceed the standard noted in <u>Table 19-1</u>, a more detailed analysis using computer modeling techniques should be used.

If it is not certain whether there is an air quality impact on an EA, the procedures for an Environmental Impact Statement (EIS) outlined in <u>Section 19.2.2.3</u> should be followed.

### **19.2.2.3** Environmental Impact Statement

The air quality analysis in an EIS should normally include at least the results of a screening level analysis. Each alternative, including the no-build alternative, should be analyzed. In most circumstances, the build alternatives will indicate an improvement in

carbon monoxide concentrations. A flow chart illustrating the project evaluation process is provided in *Figure 19-2*.

Ozone, nitrogen dioxide, particulate matter (not associated with construction), sulfur dioxide and lead are regional pollutants. It is not possible to estimate the individual effects of a project on these regional pollutants. Therefore, project level analyses are not required for these pollutants in either attainment or non-attainment areas.

The following sections describe the type of analysis required on a project level for attainment areas and non-attainment/maintenance areas for carbon monoxide, particulate matter criteria pollutants, and greenhouse gases, as appropriate.

### 19.2.2.3.1 Carbon Monoxide

Attainment/Non-attainment/Maintenance Areas – Levels of carbon monoxide (CO) tend to be the highest adjacent to intersections. Application of a screening test is typically not required for smaller projects with no potential to result in CO hotspots.

**Figure 19-2** documents the process for determining whether carbon monoxide screening is required on a project. When a project carbon monoxide screening test is required, intersections within the project corridor should be reviewed to evaluate the potential for a violation of the carbon monoxide **NAAQS**. At a minimum, the intersection with a combination of the highest intersection approach volume and lowest approach speed should be screened for carbon monoxide using the latest FDOT's carbon monoxide Screening Model (**CO Florida 2012**). The screening test should be performed for future (opening year and design year) conditions with and without the proposed roadway improvements. For additional information on data requirements for the carbon monoxide screening model, see <u>User's Guide to CO Florida 2012</u> for the screening methodology and the Environmental Office Software Download web page (<u>Section 19.4</u>) for a link to download the free screening model. <u>Figure 19-3</u> includes the **Traffic Data for Air Quality Analysis Form, Form No. 650-050-36** to be used for entering traffic data in the Screening Model.

**CO Florida 2012** incorporates both the EPA's emission rates model, MOVES, and dispersion model, CAL3QHC. MOVES is a state-of-the-science emission modeling system that estimates emissions for mobile sources at the national, county, and project level for criteria pollutants and greenhouse gases. CAL3QHC is a steady-state software model designed to estimate air pollution concentrations at receptors downwind of highways. **CO Florida 2012** quickly and easily screens intersections for the ambient CO **NAAQS. CO Florida 2012** incorporates worst case conservative assumptions including peak hour traffic, January time-frame temperatures, meteorology (wind speed, stability class, and wind angle search), and close-in receptors. If the CO **NAAQS** are not exceeded during screening, using the worst-case assumptions, the intersection passes the screening test and no detailed modeling has to be performed. **CO Florida 2012** has built in different intersection configurations that are analyzed by the screening model after certain specific inputs are entered by the user.

Should the project fail the screening test, a detailed microscale emissions rates and dispersion analysis should be performed on the intersection failing the test to insure there are no violations of the CO **NAAQS**. The detailed microscale emissions rates and dispersion analysis should be performed using the latest versions of the EPA's MOVES and CAL3QHC models.

If the detailed microscale analysis shows that the intersection still violates the CO **NAAQS**, mitigation should be done through changes in lanes configuration, signal timing, exclusive vehicle allowances per lane, or other techniques. Once this is done the analysis should be redone for the adjusted scenarios. Compliance with the **NAAQS** standards shall be achieved in order for the proposed project to proceed.

### **19.2.2.3.2** Particulate Matter Associated with Construction

Attainment Areas - Particulate emissions associated with construction activity (e.g. dust) should be evaluated in a project. The following statement should be included in the *Air Quality Technical Memorandum* for the project:

Construction activities will cause short-term air quality impacts in the form of dust from earthwork and unpaved roads. These impacts will be minimized by adherence to applicable state regulations and to the FDOT Standard Specifications for Road and Bridge Construction.

**Non-attainment/Maintenance Areas** - The EPA has developed guidance describing how to perform a quantitative hot spots analysis for  $PM_{10}$  and  $PM_{2.5}$  (a link can be found in *Figure 19-1*). The EPA guidance applies to new or expanded highway or transit projects with significant increases in diesel traffic. Consequently, if any area within the State of Florida is ever designated non-attainment with respect to  $PM_{10}$  or  $PM_{2.5}$ , then the  $PM_{10}/PM_{2.5}$  guidance would apply. First, a determination would need to be made as to whether a project would significantly increase diesel traffic. If it would, then a quantitative  $PM_{10}/PM_{2.5}$  analysis would be required.

#### 19.2.2.3.3 Greenhouse Gases

No national standards have been established regarding Greenhouse Gases (GHG), nor has the EPA established criteria or thresholds for GHG emissions. In 2007, the U.S. Supreme Court ruled that GHG (specifically CO<sub>2</sub>) should be considered as pollutants under the **CAA**. The EPA is currently determining the implications to national policies and programs as a result of the U.S. Supreme Court decision.

In the interim, FHWA has encouraged the Division Offices to develop standard qualitative language related to GHG for inclusion in Environmental Documents. Standard language to qualitatively address GHG in Environmental Documents is provided in *Figure 19-4*.

## **19.3 DOCUMENTATION**

#### **19.3.1** Technical Memorandum

It is not necessary to prepare an extensive report to document the status of the project with respect to air quality. Rather, a brief *Air Quality Technical Memorandum* should be prepared. When final, the memorandum should be placed in the project file. The *Air Quality Technical Memorandum* should include:

- 1. A disclosure that the review and evaluation was conducted by FDOT under **NEPA** assignment, see standard language included in the first paragraph of the **Sample Air Quality Technical Memorandum** (*Figure 19-5*).
- 2. A brief description of the project and the area in which the project is located (e.g., is the area primarily residential, commercial, industrial).
- 3. A brief description of air quality conditions within the area with respect to the **NAAQS** [the current EPA designation (attainment, non-attainment, maintenance, or unclassifiable) for the area (for each of the criteria air pollutants)]. It may be appropriate to cite published information regarding regional or local trend data, when such data is available and relevant to the project.
- Confirm the project was reviewed for air quality impacts consistent with the *FHWA Discussion Paper: Appropriate Level of Highway Air Quality Analysis for a CE, EA/FONSI, and EIS* and provide the results of the analysis for the project alternatives (Build and No-Build). See <u>Section 19.2.2.3.1</u> for carbon monoxide screening requirements.
- 5. In attainment areas: The *Air Quality Technical Memorandum* should include the following statements:

The project is located in an area which is designated attainment for all of the National Ambient Air Quality Standards under the criteria provided in the Clean Air Act. Therefore, the Clean Air Act conformity requirements do not apply to the project.

6. In non-attainment/maintenance areas: The Air Quality Technical Memorandum should identify the specific LRTP/TIP in which the project is included (e.g., Fiscal Year 2015), the project identification number, and date the conformity determination for the LRTP/TIP was approved. This and other required information can be provided by inserting the following statements in to the memorandum:

> The project is located in an area that has been designated as non-attainment/maintenance for the averaging time National Ambient Air Quality Standard for pollutant under the criteria

provided in the Clean Air Act. This project is included in the urban area's current approved conforming Transportation Improvement Plan (TIP), the area's conforming long-range plan, and the area's Conformity Determination Report. The project's design concept and scope are the same as that which were evaluated in the conforming TIP and long-range plan.

7. Text addressing GHG emissions (see text provided in *Figure 19-4*).

An example Air Quality Technical Memorandum is provided as Figure 19-5.

#### **19.3.2** Environmental Document

The results documented in the *Air Quality Technical Memorandum* are documented in the Environmental Document as described below:

- Type 2 CEs For Type 2 CEs, air quality analysis results documented in the *Air Quality Technical Memorandum* must be addressed in Section 3 Environmental Analysis, Item D.2 Physical/Air Quality of the *Type 2 Categorical Exclusion Determination Form, Form No. 650-000-01* and demonstrate whether the proposed project's impacts are significant: Yes (Significant Impact), No (No Significant Impact), Enhance (Enhancement) or No Involvement (Issue absent, no involvement). The purpose of this form is to provide focused documentation. Supporting information is documented in the referenced *Air Quality Technical Memorandum*. Also include GHG text provided in *Figure 19-4*.
- EAs The air quality analysis results documented in the *Air Quality Technical Memorandum* are summarized under the Environmental Analysis section of the EA, including GHG text provided in *Figure 19-4*.
- EISs The Environmental Analysis section includes a brief summary statement on air quality related issues, including a statement that indicates that there will not be any violations of the NAAQS for carbon monoxide. This section should summarize results of the air quality analysis documented in the Air Quality Technical Memorandum including the text for GHG (Figure 19-4).
- State Environmental Impact Report (SEIR) If an analysis is performed, the results are included in the Environmental Analysis section of the State Environmental Impact Report Form, Form No. 650-050-43. See (Part 1, Chapter 10, State, Local and Privately Funded Project Delivery) for more detail on how to prepare a SEIR.

#### **19.4 REFERENCES**

Chapter 62-204, F.S., Air Pollution Control – General Provisions. <u>https://www.flrules.org/gateway/ChapterHome.asp?Chapter=62-204</u>

- CEQ, Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews. August 1, 2016 Memorandum. <u>https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance</u>
- EPA, 1998. NOx, How Nitrogen Oxides Affect the Way We Live and Breathe. EPA 456/F-98-005.
- EPA, 2016. The Green Book Nonattainment Areas for Criteria Pollutants. https://www.epa.gov/green-book
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- FHWA, Discussion Paper: Appropriate Level of Highway Air Quality Analysis for a CE, EA/FONSI, and EIS, March 1986. <u>http://www.environment.fhwa.dot.gov/guidebook/vol1/doc1r.pdf</u>
- FHWA, Memo from Gloria Shepherd, August 4, 2016, Transmittal of CEQ Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews. <u>http://www.fhwa.dot.gov/environment/climate\_change/adaptation/policy\_and\_guidance/ghgnepa.cfm</u>
- Memorandum of Agreement Between FHWA and FDOT Concerning the State of Florida's Participation in the Surface Transportation Project Delivery Program Pursuant to 23 U.S.C. 327, December 14, 2016. <u>http://www.fdot.gov/environment/pubs/Executed-FDOT-NEPA-Assignment-MOU-2016-1214.pdf</u>
- Title 40 CFR Part 93, Determining Conformity of Federal Actions to State or Federal Implementation Plans. http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr93\_main\_02.tpl
- Title 42 U.S.C. § 85, Subchapter I (Programs and Activities), Part A (Air Quality and Emission Limitations). <u>http://uscode.house.gov/browse/prelim@title42/chapter85/subchapter1/partA&edi</u> <u>tion=prelim</u>

## 19.5 FORMS

State Environmental Impact Report Form, Form No. 650-050-43\*

Traffic Data for Air Quality Analysis Form, Form No. 650-050-36

Type 2 Categorical Exclusion Determination Form, Form No. 650-000-01\*

\*To be completed in <u>SWEPT</u>

Note: Hyperlinks are only for those with FDOT Intranet access only. Those without Intranet access may view or download forms at: <u>http://www.fdot.gov/procedures/</u>. Sign in is required.

#### 19.6 HISTORY

8/18/1999, 9/13/2006, 8/24/2016

### Federal Highway Administration

Policies and Guidance Papers.

http://www.fhwa.dot.gov/environment/air\_quality/conformity/policy\_and\_guidance

#### Air Quality.

http://www.fhwa.dot.gov/environment/air\_quality/

Transportation conformity. http://www.fhwa.dot.gov/environment/conform.htm

### **Florida Department of Environmental Protection**

Current air quality rules (Chapter 62-4, F.A.C.) –. http://www.dep.state.fl.us/air/rules/current.htm

General Air Quality Publications. <u>http://www.dep.state.fl.us/air/publication/general.htm</u>

### **U.S. Environmental Protection Agency**

- Tier 3 Vehicle Emission and Fuel Standards Program. http://www3.epa.gov/otag/tier3.htm
- What Are the Six Common Air Pollutants? https://www.epa.gov/criteria-air-pollutants
- National Ambient Air Quality Standards (NAAQS). <u>https://www.epa.gov/criteria-air-pollutants/naaqs-table</u>

CAL3QHC Model.

http://www3.epa.gov/ttn/scram/dispersion\_prefrec.htm#cal3qhc

Guidance on Hot Spots Analysis for PM<sub>10</sub> and PM<sub>2.5.</sub> <u>http://www.epa.gov/otag/stateresources/transconf/projectlevel-hotspot.htm</u>

Motor Vehicle Emission Simulator (MOVES) Model. http://www.epa.gov/otaq/models/moves/

State Implementation Plans (Region 4). http://www3.epa.gov/region4/air/sips/

#### Figure 19-1 Air Quality Information Sources



\*Assumes that the project scope (concept and design) have not changed significantly from what is identified in the LRTP/TIP. If the scope has changed significantly, the MPO must reevaluate and re-conform their TIP.

Figure 19-2 Air Quality Analysis Process (for Carbon Monoxide) Air Quality Technical Memorandum

#### TRAFFIC DATA FOR AIR QUALITY ANALYSIS

Date:		Pro	epared	by:								
Financial N	lanage	nent N	umber	r(s):								
Federal Aid	d Numb	er(s):										
Project Des	scription	n:										
NOTE: Traff volume. Nota should be the per hour (vph unknown. Th 2004 Intersec Guide).	fic data s bly, the number a) and vel is traffic tion Scree	hould be intersect of inters nicle spe data she cening M	e provid ion may ection a eds sho et was j lodel. N	led for th y not be t pproach uld be re prepared Notably, a	e interso he same through presenta to assiss addition	ection the e for the lanes. T ative of j t in obta al traffic	hat is forect Build and The traffic v posted spee ining appro- c data is rec	ast to ha No-Buil volumes eds if inte opriate tr quired fo	ve the hi d alterna should b ersection affic dat r diamon	ghest tota atives. Th e represen cruise ap a for the I nd interch	al approve e number ntative opproach FDOT C anges (s	ach traffic er of lanes of vehicles speeds are O Florida see User's
Opening Y	/ear:											
Intersection	ns: Buil	d				_	No-Buil	d				-
Land Use: Build/	Urban	, EB	Subu	rban	, or WB	Rural		NB			SB	
No-Build Build	No. of Lanes	VPH	Spd	No. of Lanes	VPH	Spd	No. of Lanes	VPH	Spd	No. of Lanes	VPH	Spd
No-Build												
======= Design Yea	ar:									=====		
Intersections: Build					_	No-Buil	d					
Land Use:	Urban	,	Subu	rban	, or	Rural						
Build/ No-Build	No. of	EB		No. of	WB		No. of	NB		No. of	SB	
Build	Lanes	VPH	Spd	Lanes	VPH	Spd	Lanes	VPH	Spd	Lanes	VPH	Spd
No-Build												

#### Figure 19-3 Example Traffic Data Input Sheet

#### Greenhouse Gases

#### [USE THIS STATEMENT FOR TYPE 2 CEs]

The project is expected to improve traffic flow [describe in one sentence how; for example, adding lane to relieve congestion], which should reduce operational greenhouse gas emissions.

#### [USE THIS STATEMENT FOR EAs and EISs]

No national standards have been established for GHGs. Similarly, the United States Environmental Protection Agency has not established criteria or thresholds for ambient GHG emissions pursuant to its authority to establish motor vehicle emission standards for CO2 under the Clean Air Act. GHGs are different from other air pollutants evaluated in federal environmental reviews because impacts are not localized or regional due to their rapid dispersion into the global atmosphere. Therefore, it is difficult to isolate and understand the GHG emissions impacts for a particular transportation project given there is no scientific methodology for attributing specific climatological changes to that transportation project's emissions.

FDOT concluded, based on the nature of GHG emissions and the exceedingly small potential for GHG impacts from the proposed project, that the GHG emissions from the proposed action will not play a meaningful role in a determination of an environmentally preferable alternative or the selection of the preferred alternative.

No alternatives-level GHG analysis has been performed for this project since GHG emissions is very small in the context of the affected environment.

#### Figure 19-4 Greenhouse Gases (GHG) Standard Text

Date:

To: Name, Title

From: Name, Title

Subject: Financial Management Number(s)\_\_\_\_\_ Air Quality Screening Test *Project Description,* \_\_\_\_\_County

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by FDOT pursuant to 23 U.S.C. § 327 and a Memorandum of Understanding dated December 14, 2016 and executed by FHWA and FDOT.

The proposed project is located in \_\_\_\_\_ County, an area currently designated as being <u>attainment/non-attainment/maintenance</u> for the following criteria air pollutant(s) <u>ozone/nitrogen</u> <u>dioxide/particulate matter (2.5 microns in size and 10 microns in size)/sulfur dioxide/carbon</u> <u>monoxide/lead</u>.

The project alternatives were subjected to a carbon monoxide (CO) screening model that makes various conservative worst-case assumptions related to site conditions, meteorology and traffic. The Florida Department of Transportation's (FDOT's) screening model for CO uses the latest United States Environmental Protection Agency (EPA)-approved software to produce estimates of one-hour and eight-hour CO at default air quality receptor locations. The one-hour and eight-hour estimates can be directly compared to the current one-and eight-hour **National Ambient Air Quality Standards** (NAAQS) for CO.

The roadway intersection forecast to have the highest total approach traffic volume was <u>name of</u> <u>intersection</u>. The Build and No-Build scenarios for both the opening year (<u>year</u>) and the design year (<u>year</u>) were evaluated. The traffic data input used in the evaluation is attached to this memorandum.

Estimates of CO were predicted for the default receptors which are located 10 feet to 150 feet from the edge of the roadway. Based on the results from the screening model, the highest project-related CO one- and eight-hour levels are not predicted to meet or exceed the one- or eight-hour **National Ambient Air Quality Standards (NAAQS)** for this pollutant with either the No-Build or Build alternatives. As such, the project "passes" the screening model. The results of the screening model are attached to this memorandum.

[For projects in non-attainment or maintenance areas also include the following paragraph] The project is located in an area that has been designated as <u>non-attainment/maintenance</u> for the <u>averaging time</u> National Ambient Air Quality Standard for <u>pollutant</u> under the criteria provided in the Clean Air Act. This project is included in the urban area's current approved conforming Transportation Improvement Plan (TIP), the area's conforming long-range plan, and the area's Conformity Determination Report. The project's design concept and scope are the same as that which were evaluated in the conforming TIP and long-range plan. A copy of FDOT's memorandum documenting conformity for the project is attached.

#### [Insert text from Figure 19-4 to address greenhouse gas (GHG) emissions]

#### Figure 19-5 Sample Air Quality Technical Memorandum