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From: Perdomo, Federico R [Federico.Perdomo@unistarnuclear.com]
Sent: Friday, September 25, 2009 10:53 PM
To: Quinn, Laura
Cc: Stevenson, Michael; Frailer, Melanie D; Yox, Michael J; Konerth, Thomas L; Weissinger, Thomas R; Lutchenkov, Dimitri
Subject: UniStar letter UN#09-396 - RAI No. 1014, Ozone Air Emissions during Construction and Operation (E-Mail 2 of 2)
Attachments: FINAL UN#09-396 -- SIGNED (Pages 30 -59).pdf

Laura,

Attached please find UniStar letter UN#09-396, "RAI No. 1014, Ozone Air Emissions during Construction and Operation." The hard copies of this letter will be distributed as normal. This E-mail copy will help in any telephone discussions that we may have near-term.

Due to file size limitations, I will sent this letter in two parts. This is the second part.

Thank You

Federico Perdomo

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AIG recommends that the surface characteristics be determined based on the land use surrounding the site where the surface meteorological data were collected.

Since 1992, there has been some conversion of the land south of the meteorological tower to native ground cover. However, that area is slated to be affected by the construction of Unit 3, will be cleared (see CPCN Technical Document, Figure 2.1-1), and will end up more like the 1992 land use characterization. Therefore, the 1992 land use characterization is reasonably representative for this application.

As recommended in the AIG for surface roughness, the 1-km radius circular area centered at the tower site can be divided into sectors for the analysis; each chosen sector has a mix of land uses that is different from that of other selected sectors. Three sectors were used for this analysis based upon visual observation of the land use about the site as shown on the land cover image (see Figure 3-4).

In AERSURFACE, the various land cover categories are linked to a set of seasonal surface characteristics. As such, AERSURFACE requires specification of the seasonal category for each month of the year. The following five seasonal categories are supported by AERSURFACE, with the applicable months of the year specified for this site.

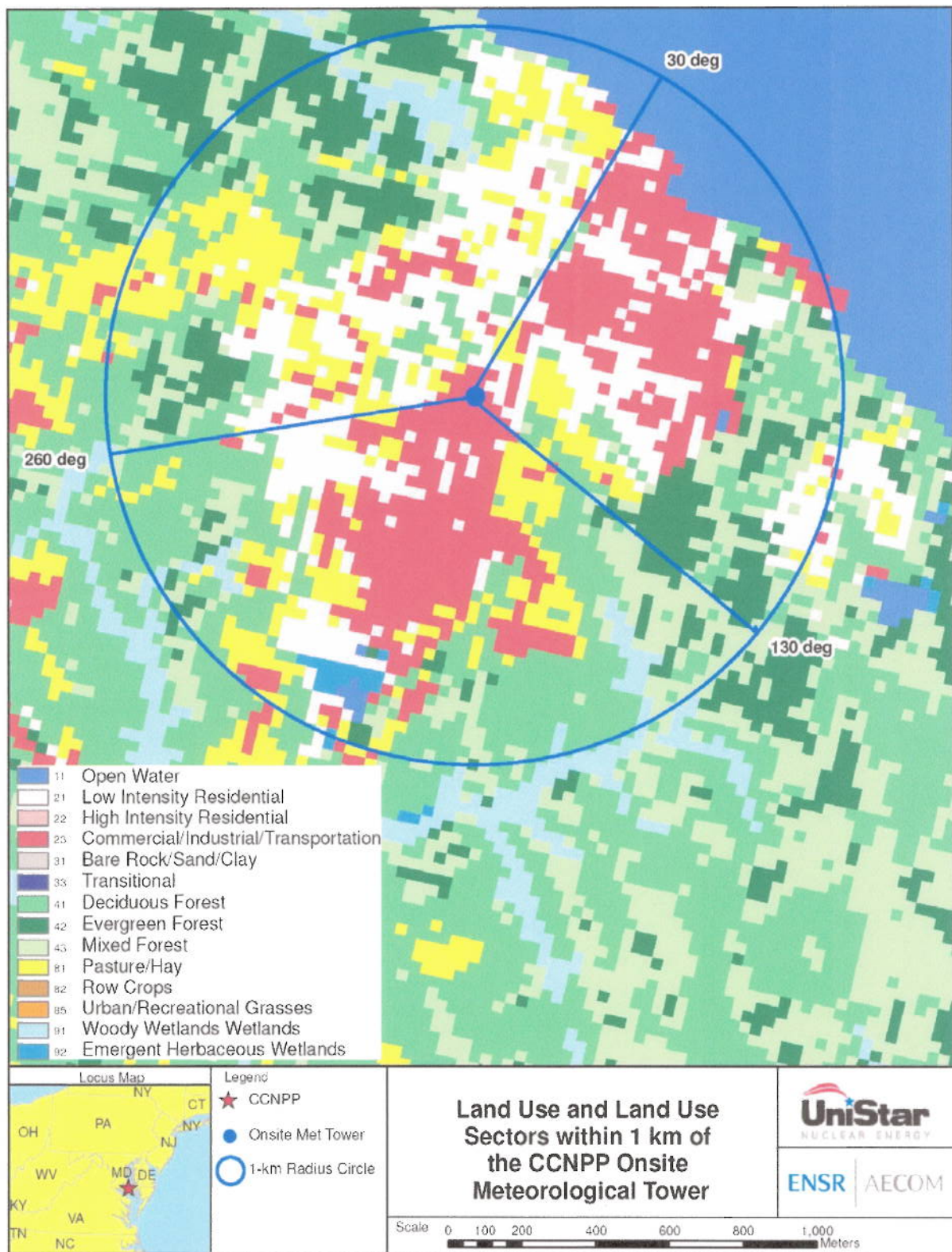
1. Midsummer with lush vegetation (May-September).
2. Autumn with un-harvested cropland (October-November).
3. Late autumn after frost and harvest, or winter with no snow (January, February, December).
4. Winter with continuous snow on ground (Not present).
5. Transitional spring with partial green coverage or short annuals (March-April).

For Bowen ratio, the land use values are linked to three categories of surface moisture corresponding to average, wet and dry conditions. The surface moisture condition for the site may vary depending on the meteorological data period for which the surface characteristics will be applied. AERSURFACE applies the surface moisture condition for the entire data period. Therefore, if the surface moisture condition varies significantly across the data period, then AERSURFACE can be applied multiple times to account for those variations. As recommended in AERSURFACE User's Guide, the surface moisture condition for each month were determined by comparing precipitation for the period of data to be processed to the 30-year climatological record (for this application Washington Reagan Airport was used), selecting "wet" conditions if precipitation is in the upper 30th-percentile, "dry" conditions if precipitation is in the lower 30th-percentile, and "average" conditions if precipitation is in the middle 40th-percentile. The monthly designations of surface moisture input to AERSURFACE are also summarized in Table 5-1.

Table 3-1 AERSURFACE Bowen Ratio Condition Designations

Month	Bowen Ratio Category				
	2001	2002	2003	2004	2005
January	Dry	Dry	Average	Dry	Wet
February	Average	Dry	Wet	Average	Dry
March	Average	Average	Average	Dry	Wet
April	Dry	Average	Average	Wet	Wet
May	Average	Dry	Wet	Average	Wet
June	Wet	Wet	Wet	Average	Average
July	Wet	Dry	Wet	Wet	Average
August	Average	Dry	Wet	Wet	Average
September	Dry	Average	Wet	Average	Dry
October	Dry	Wet	Wet	Dry	Wet
November	Dry	Average	Average	Wet	Dry
December	Dry	Wet	Wet	Average	Average

Figure 3-4 Land-Use Sectors within 1 km of On-Site Meteorological Tower



3.5 Modeling Approach

Unit 3 construction activities were divided into seven area sources based on their location and they are shown in Figure 2-1. Emissions from activities on the paved access road were modeled as a line source. Each area source represented emissions from several types of activities. For activities that will occur less than a 24 hours per day, such as grading and compaction, dirt excavation and moving, unpaved road construction, barge to concrete plant deliveries, and dewatering and earthwork, the modeling assumed emissions only for hours between 6 AM and 6 PM. Emissions for all other activities were assumed to occur for all hours of the day.

The short-term emissions for all modeled pollutants were based on the 250 days of operation and annual emissions were based on 365 days of operations. The short-term PM₁₀ emissions for the seven years of construction are listed in Appendix A in Tables A-1 through A-7 and annual PM₁₀ emissions are listed in Tables A-8 through A-14. Modeling of PM₁₀ emissions was conducted for the individual seven years of construction (years 2010 through 2016) due to large variations in activities relating to PM₁₀ emissions from year to year. The second year of construction (year 2011) would result in the highest overall emissions from combustion sources. Therefore, modeling of SO₂, NO_x, and CO was conducted using the 2011 year emissions. The short-term SO₂ and CO emissions are listed in Table A-15 and annual SO₂ and NO_x emissions are listed in Table A-16.

3.5.1 PM_{2.5} NAAQS Compliance Analysis

After the promulgation of the PM_{2.5} National AAQS in 1997, USEPA determined that it does not have a suitable technical approach for modeling PM_{2.5} concentrations. Therefore, USEPA established a policy to use the implementation of the New Source Review program for PM₁₀ as a surrogate for PM_{2.5} compliance until the necessary tools are in place to model PM_{2.5} concentrations. This policy was articulated in a memorandum (Interim Implementation of New Source Review for PM_{2.5}) from John S. Seitz (Director of US EPA's Office of Air Quality Planning and Standards) to Regional Air Directors on October 23, 1997. This policy is still in effect (reaffirmed on April 5, 2005 in "Implementation of New Source Review Requirements in PM_{2.5} Non-attainment Areas," by Stephen D. Page, Director, EPA Office of Air Quality Planning & Standards. The Co-Applicants are using compliance with the NAAQS for PM₁₀ as a surrogate for compliance with the PM_{2.5} NAAQS. Mr. William Harnett, Director of EPA's Air Quality Policy Division, has indicated (2007) that the PM₁₀ surrogate policy remains in effect for attainment areas until the PM_{2.5} New Source Review State Implementation Rule is promulgated and the required State Implementation Plan for Maryland is adopted by EPA.

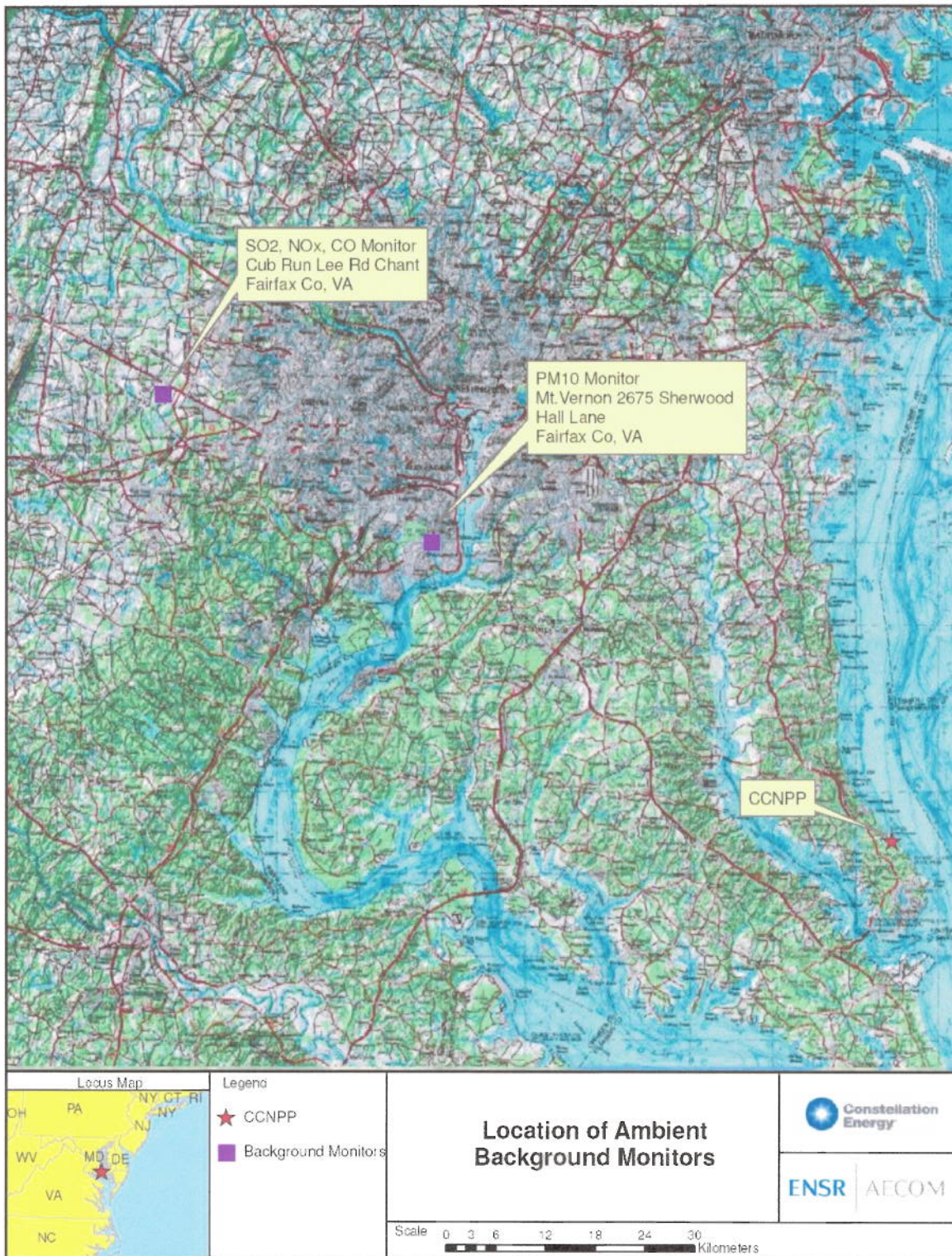
3.6 Background Air Quality

For the NAAQS compliance analysis, the modeled impacts are summed with representative background concentrations that account for distant or small local sources not explicitly modeled. The nearest available site of PM₁₀ measurements is located in Virginia, about 66 km northwest of the CCNPP. The nearest available site of SO₂, CO, and NO_x measurements is also located in Virginia, about 100 km northwest of the CCNPP. The latest three years of background monitoring data was used. The representative monitoring location is plotted in Figure 3-5 and the monitored values are summarized in Table 3-2.

Table 3-2 Ambient Monitoring Background Concentrations

Pollutant	Averaging Period	Ranking	Year	Concentration ($\mu\text{g}/\text{m}^3$)	Monitor ID	Monitor Address	County	State
PM ₁₀	24-hour	H2H	2005	38.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
		H2H	2006	40.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
		H2H	2007	36.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
		3-Year Average Value		38.0				
	Annual	H	2005	21.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
		H	2006	21.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
		H	2007	20.0	510590018	Mt. Vernon 2675 Sherwood Hall Lane	Fairfax Co	VA
3-Year Average Value		20.7						
SO ₂	3-hour	H2H	2005	65.5	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2006	52.4	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2007	49.8	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		3-Year Average Value		55.9				
	24-hour	H2H	2005	31.4	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2006	26.2	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2007	21.0	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		3-Year Average Value		26.2				
	Annual	H	2005	7.9	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H	2006	7.9	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H	2007	7.9	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
	3-Year Average Value		7.9					
	NO _x	Annual	H	2005	18.8	510590005	Cub Run Lee Rd Chant	Fairfax Co
H			2006	15.0	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
H			2007	15.0	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
3-Year Average Value			16.3					
CO	1-hour	H2H	2005	1,955	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2006	1,610	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2007	1,610	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		3-Year Average Value		1725.0				
	8-hour	H2H	2005	1,725	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2006	1,360	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
		H2H	2007	1,495	510590005	Cub Run Lee Rd Chant	Fairfax Co	VA
3-Year Average Value		1533.3						

Figure 3-5 Location of the Ambient Background Monitors



4.0 Modeling Results for the Unit 3 Construction Emissions

NAAQS compliance modeling results for PM₁₀, SO₂, CO, and NO_x are presented in Tables 4-1 through 4-4, respectively. The short-term impacts were estimated by adding the highest, second-high impact to the monitoring background value and annual impacts were estimated by adding the highest impact to the monitoring background value.

The PM₁₀ modeling results are presented for the seven years of constructions and they indicate that the second year of constructions (year 2011) would result in the highest PM₁₀ concentrations. Modeling of SO₂, CO, and NO_x emissions was conducted only for year 2011 since it would result in the highest combustion-related emissions over the seven years of construction activity.

The predicted short-term and annual impacts of PM₁₀, SO₂, CO, and NO_x are well below their respective NAAQS, so compliance with the NAAQS is demonstrated.

Table 4-1 PM₁₀ Modeling Results of Unit 3 Construction Emission Sources

Pollutant	Averaging Period	Unit 3 Construction Year	2001-2005 Modeled Concentration ¹	Ambient Monitoring Background	Total	NAAQS
			(µg/m ³)	(µg/m ³)	(µg/m ³)	(µg/m ³)
PM ₁₀	24-hr	2010	70.6	38	108.6	150
	24-hr	2011	88.4	38	126.4	150
	24-hr	2012	56.3	38	94.3	150
	24-hr	2013	52.2	38	90.2	150
	24-hr	2014	20.7	38	58.7	150
	24-hr	2015	10.0	38	48.0	150
	24-hr	2016	9.9	38	47.9	150
	Annual	2010	4.8	21	25.5	50
	Annual	2011	6.4	21	27.1	50
	Annual	2012	5.0	21	25.7	50
	Annual	2013	5.4	21	26.1	50
	Annual	2014	2.6	21	23.3	50
	Annual	2015	1.3	21	22.0	50
	Annual	2016	1.3	21	22.0	50

¹ The reported concentration is the highest, second-highest for 24-hr periods, and the highest for annual periods.

Table 4-2 SO₂ Modeling Results of Unit 3 Construction Emission Sources

Pollutant	Averaging Period	Unit 3 Construction Year	2001-2005 Modeled Concentration ¹	Ambient Monitoring Background	Total	NAAQS
			(µg/m ³)	(µg/m ³)	(µg/m ³)	(µg/m ³)
SO ₂	3-hour	2011	18.9	55.9	74.8	1,300
	24-hr	2011	3.9	26.2	30.1	365
	Annual	2011	0.5	7.9	8.4	80

1 The reported concentration is the highest, second-highest for 24-hr periods, and the highest for annual periods.

Table 4-3 CO Modeling Results of Unit 3 Construction Emission Sources

Pollutant	Averaging Period	Unit 3 Construction Year	2001-2005 H2H Modeled Concentration	Ambient Monitoring Background	Total	NAAQS
			(µg/m ³)	(µg/m ³)	(µg/m ³)	(µg/m ³)
CO	1-hour	2011	691.9	1,725.0	2,416.9	40,000
	8-hour	2011	137.7	1,533.3	1,671.0	10,000

Table 4-4 NO_x Modeling Results of Unit 3 Construction Emission Sources

Pollutant	Averaging Period	Unit 3 Construction Year	2001-2005 Max Modeled Concentration	Ambient Monitoring Background	Total	NAAQS
			(µg/m ³)	(µg/m ³)	(µg/m ³)	(µg/m ³)
NO _x	Annual	2011	12.9	16.3	29.2	100

5.0 References

Technical Report in Support of Application of UNISTAR Nuclear Energy, LLC and UNISTAR Nuclear Operating Services, LLC for Certificate of Public Convenience and Necessity Before the Maryland Public Service Commission for Authorization to Construct Unit 3 at Calvert Cliffs Nuclear Power Plant and Associated Transmission Lines. Available at

http://webapp.psc.state.md.us/intranet/Casenum/submit.cfm?DirPath=C:\Casenum\9100-9199\9127\Item_001\&CaseN=9127\Item_001.

U.S. EPA 2004. User's Guide for the AERMOD Meteorological Processor (AERMET) EPA Document No. EPA-454/B-03-002. Office of Air Quality Planning and Standards, Research Triangle Park, NC. November.

U.S. EPA 2005a. Guideline on Air Quality Models (Revised). Codified in the Appendix W to 40 CFR Part 51. Office of Air Quality Planning and Standards, Research Triangle Park, NC. November.

U.S. EPA 2005a. Implementation of New Source Review Requirements in PM-2.5 Nonattainment Areas. Memo by Stephen Page, available at <http://www.epa.gov/nsr/documents/nsrmemo.pdf>.

U.S. EPA 2008. AERMOD Implementation Guide. Office of Air Quality Planning and Standards, Research Triangle Park, NC. Revised January 9, 2008.

Appendix A

Construction Emissions

Table A-1 PM₁₀ Short-Term Emissions for Year 2010

Modeled Area ID	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)
			VEHICLE TRAVEL EMISSIONS			GRADING/EXCAVATION				Diesel & Gasoline Emissions				
Hours of Operations (hour ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering Earthwork	Batch Plant	Concrete	Others (incl. gasoline)
USAREA	126,360	31	7-18	7-18	1-24	7-18	7-18	7-18	7-18	1-24	7-18	1-24	1-24	7-18
AREA2	178,435	44	0.96	0.01	0.05	1.74	2.51	4.66	0.95	0.16	0.023	0.03	0.03	4,104E-07
AREA3	95,106	23	0.96	0.01	0.05	1.74	1.89	3.51	0.71	0.16	0.018	0.03	0.03	4,018E-07
AREA4	235,625	58	0.96	0.01	0.05	2.90	4.67	8.69	1.77	0.16	0.0098	0.018	0.03	4,170E-07
AREA5	245,982	61	0.96	0.01	0.05	3.49	4.88	9.08	1.84	0.16	0.0098	0.015	0.03	3,984E-07
AREA6	99,198	24.5	0.96	0.01	0.05	0.12	0.12	3.66	0.50	0.16	0.08	0.015	0.03	3,971E-07
AREA7	6,000	1.48	0.05	0.05	0.05			0.04	0.04	0.04	0.04	0.04	0.04	1,250E-07
AREA7	6,000	1.48	0.05	0.05	0.05			0.04	0.04	0.04	0.04	0.04	0.04	1,470E-06
AREA7	6,000	1.48	0.05	0.05	0.05			0.04	0.04	0.04	0.04	0.04	0.04	1,470E-06
Paved Road Line			0.081											
TOTAL ALL AREAS (TPY)	244	4.86	0.75	0.05	0.28	11.62	17.49	36.19	0.22	7.10	1.11	0.11	0.11	0.19
														Total = 89.2

Table A-2 PM₁₀ Short-Term Emissions for Year 2011

Modeled Area ID	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)
			VEHICLE TRAVEL EMISSIONS			GRADING/EXCAVATION				Diesel & Gasoline Emissions				
Hours of Operations (hour ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering Earthwork	Batch Plant	Concrete	Others (incl. gasoline)
USAREA	126,360	31	1-24 Vary	7-18	1-24	7-18	1-24	7-18	7-18	1-24	7-18	1-24	1-24	7-18
AREA2	178,435	44	3.03	0.01	0.12	1.18	2.66	4.77	0.95	0.17	0.059	0.06	0.06	4,550E-07
AREA3	95,106	23	3.03	0.01	0.12	1.18	3.75	6.73	1.34	0.17	0.053	0.06	0.06	4,319E-07
AREA4	235,625	58	3.03	0.01	0.12	1.97	2.00	3.69	0.71	0.17	0.043	0.06	0.06	4,702E-07
AREA5	245,982	61	3.03	0.01	0.12	2.37	4.95	8.89	1.77	0.17	0.0375	0.043	0.06	4,289E-07
AREA6	99,198	24.5	3.03	0.01	0.12	0.38	5.17	9.28	1.84	0.17	0.0375	0.033	0.06	4,220E-07
AREA7	6,000	1	0.08	0.08	0.12			3.74	0.79	0.17	0.28	0.033	0.06	8,304E-07
AREA7	6,000	1.48	0.08	0.08	0.12			0.43	0.04	0.04	0.0562	0.04	0.04	4,781E-07
AREA7	6,000	1.48	0.08	0.08	0.12			0.04	0.04	0.04	0.04	0.04	0.04	2,034E-06
AREA7	6,000	1.48	0.08	0.08	0.12			0.04	0.04	0.04	0.04	0.04	0.04	2,034E-06
Paved Road Line Source			0.30											
TOTAL ALL AREAS (TPY)	244	15.47	1.24	0.07	0.73	7.89	18.52	37.00	0.43	7.39	1.18	0.42	0.26	0.38
														Total = 91.4

Table A-3 PM10 Short-Term Emissions for Year 2012

Modeled Area ID	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)															TOTAL (q m ² /s)	Committer/Commercial Traffic (q m ² /s)					
			VEHICLE TRAVEL EMISSIONS					GRADING EXCAVATION					Diesel & Gasoline Emissions											
			Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)								
Hours of Operations (hour ending)	1-24 Vary	7-18	7-18	7-18	1-24	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	1-24	7-18	7-18			
USAREA	126,360	31			0.00	0.09	0.00	0.00	0.00	1.50	1.81	0.95	0.08				0.097	0.09	4.573E-07	2.816E-06	7-18	1-24		
AREA2	178,435	44	3.33		0.00	0.09	0.00	0.00	0.00	2.12	2.55	1.34	0.08				0.088	0.09	4.328E-07	2.774E-06	7-18	7-18	9.522E-07	
AREA3	95,106	23	3.33		0.00	0.09	0.00	0.00	0.00	1.13	1.36	0.71	0.08				0.074	0.09	4.698E-07	2.863E-06	7-18	7-18	1.786E-06	
AREA4	235,625	58	3.33	0.09	0.00	0.09	0.00	0.00	0.00	2.80	3.37	1.77	0.08	0.0527	0.074	0.09	0.074	0.09	4.290E-07	2.787E-06	7-18	7-18	7.211E-07	
AREA5	245,982	61	3.33	0.09	0.00	0.09	0.00	0.00	0.00	2.93	3.52	1.84	0.08	0.0527	0.061	0.09	0.061	0.09	4.242E-07	2.782E-06	7-18	7-18	6.907E-07	
AREA6	99,198	25	3.33	0.09	0.00	0.09				1.42		0.50	0.08	0.40	0.061	0.09	0.061	0.09	7.982E-07	1.731E-06	7-18	7-18	1.713E-06	
AREA7	6,000	1		0.02								0.22	0.02	0.0790					6.717E-07	4.366E-06	7-18	7-18	7.090E-07	
AREA7	6,000	1.48		0.02									0.02							7.090E-07	7-18	7-18	7.090E-07	
AREA7	6,000	1.48		0.02									0.02							7.090E-07	7-18	7-18	7.090E-07	
Paved Road	Line Source		0.59																					
TOTAL ALL AREAS (TPY)	244	244	17.24	0.35	0.02	0.53	0.00	0.50	14.02	10.49	14.02	0.22	7.10	0.56	0.59	0.45	0.56	52.6						2.989E-02

Table A-4 PM10 Short-Term Emissions for Year 2013

Modeled Area ID	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)															TOTAL (q m ² /s)	Committer/Commercial Traffic (q m ² /s)					
			VEHICLE TRAVEL EMISSIONS					GRADING EXCAVATION					Diesel & Gasoline Emissions											
			Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)								
Hours of Operations (hour ending)	1-24 Vary	7-18	7-18	7-18	1-24	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	7-18	1-24	7-18	7-18	1-24	7-18	7-18
USAREA	126,360	31			0.00	0.08	0.00	0.00	0.00	0.95	0.36	0.56	0.03				0.080	0.09	2.924E-07	1.154E-06	7-18	7-18	1.154E-06	1.321E-06
AREA2	178,435	44	4.62		0.00	0.08	0.00	0.00	0.00	1.34	0.50	0.80	0.03				0.071	0.09	2.710E-07	1.25E-06	7-18	7-18	1.25E-06	2.478E-06
AREA3	95,106	23	4.62		0.00	0.08	0.00	0.00	0.00	0.71	0.27	0.42	0.03				0.067	0.09	3.015E-07	1.187E-06	7-18	7-18	1.187E-06	2.478E-06
AREA4	235,625	58	4.62	0.00	0.00	0.08	0.00	0.00	0.00	1.77	0.66	1.05	0.03	0.0527	0.057	0.09	0.057	0.09	2.680E-07	1.107E-06	7-18	7-18	1.107E-06	1.000E-06
AREA5	245,982	61	4.62	0.00	0.00	0.08	0.00	0.00	0.00	1.85	0.69	1.10	0.03	0.0527	0.043	0.09	0.043	0.09	2.645E-07	1.106E-06	7-18	7-18	1.106E-06	9.579E-07
AREA6	99,198	25	4.62	0.00	0.00	0.08				0.49	0.28	0.00	0.03	0.40	0.043	0.09	0.043	0.09	5.296E-07	4.150E-07	7-18	7-18	4.150E-07	2.375E-06
AREA7	6,000	1.48		0.00								0.00	0.01	0.0790					6.717E-07	1.229E-07	7-18	7-18	1.229E-07	
AREA7	6,000	1.48		0.00									0.01							1.229E-07	7-18	7-18	1.229E-07	
AREA7	6,000	1.48		0.00									0.01							1.229E-07	7-18	7-18	1.229E-07	
AREA7	6,000	1.48		0.00									0.01							1.229E-07	7-18	7-18	1.229E-07	
Paved Road	Line Source		0.88																					
TOTAL ALL AREAS (TPY)	244	244	23.97	0.00	0.01	0.48	0.00	0.49	6.62	6.62	2.76	0.00	3.94	0.20	0.59	0.35	0.56	40.0						4.496E-02

Table A-5 PM₁₀ Short-Term Emissions for Year 2014

Modeled Area (B)	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)					
			VEHICLE TRAVEL EMISSIONS			GRADING EXCAVATION				Diesel & Gasoline Emissions						TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)			
Hours of Operations (hour ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)						
UGAREA	126,360	31	1.24	0.00	0.00	0.02	0.00	0.12	0.24	0.12	0.95	0.01	0.050	0.08	4.101E-07	3.641E-07	1.24	7.18	1.24	
AREA2	178,435	44	1.53	0.00	0.00	0.02	0.00	0.17	0.34	0.17	1.34	0.01	0.048	0.08	4.015E-07	3.417E-07	1.24	7.18	1.24	
AREA3	95,106	23	1.53	0.00	0.00	0.02	0.00	0.09	0.18	0.09	0.71	0.01	0.045	0.08	4.169E-07	3.694E-07	1.24	7.18	1.24	
AREA4	235,625	58	1.53	0.00	0.00	0.02	0.00	0.22	0.44	0.22	1.77	0.01	0.068	0.08	3.983E-07	3.295E-07	1.24	7.18	1.24	
AREA5	245,982	61	1.53	0.00	0.00	0.02	0.00	0.23	0.46	0.23	1.84	0.01	0.068	0.08	3.971E-07	3.268E-07	1.24	7.18	1.24	
AREA6	99,198	25	1.53	0.00	0.00	0.02	0.00	0.09	0.18	0.09	0.00	0.01	0.042	0.08	1.352E-07	1.935E-07	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0147	0.08	1.250E-07	6.301E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	6.301E-08	6.301E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	6.301E-08	6.301E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.08	6.301E-08	6.301E-08	1.24	7.18	1.24	
Paved Road		0.02	0.30																	
TOTAL ALL AREAS (TPY)		244	7.93	0.00	0.00	0.12	0.00	0.92	1.66	0.92	6.60	0.10	0.11	0.27	0.48	1.530E-02				
														Total =	18.3					

Table A-6 PM₁₀ Short-Term Emissions for Year 2015

Modeled Area (B)	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)					
			VEHICLE TRAVEL EMISSIONS			GRADING EXCAVATION				Diesel & Gasoline Emissions						TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)			
Hours of Operations (hour ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)						
UGAREA	126,360	31	1.24	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.95	0.00	0.017	0.03	3.892E-07	7.216E-08	1.24	7.18	1.24	
AREA2	178,435	44	0.11	0.00	0.00	0.00	0.00	0.07	0.00	0.00	1.34	0.00	0.017	0.03	3.870E-07	6.353E-08	1.24	7.18	1.24	
AREA3	95,106	23	0.11	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.71	0.00	0.016	0.03	3.906E-07	8.187E-08	1.24	7.18	1.24	
AREA4	235,625	58	0.11	0.00	0.00	0.00	0.00	0.10	0.00	0.00	1.77	0.00	0.0046	0.03	3.886E-07	5.844E-08	1.24	7.18	1.24	
AREA5	245,982	61	0.11	0.00	0.00	0.00	0.00	0.10	0.00	0.00	1.84	0.00	0.0046	0.03	3.862E-07	5.778E-08	1.24	7.18	1.24	
AREA6	99,198	25	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.03	2.698E-08	3.767E-08	1.24	7.18	1.24	
AREA7	6,000	1	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0070	0.00	0.00	5.923E-08	1.441E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.441E-08	1.441E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.441E-08	1.441E-08	1.24	7.18	1.24	
AREA7	6,000	1.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.441E-08	1.441E-08	1.24	7.18	1.24	
Paved Road		0.02	0.02																	
TOTAL ALL AREAS (TPY)		244	0.59	0.00	0.00	0.00	0.00	0.37	0.00	0.00	6.60	0.02	0.05	0.09	0.20	1.222E-03				
														Total =	7.9					

Table A-7 PM₁₀ Short-Term Emissions for Year 2016

Modeled Area ID	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)																						
			VEHICLE TRAVEL EMISSIONS						EMissions Distribution (TPY)						Diesel & Gasoline Emissions				TOTAL (q ₁₀ m ² -s)	Commuter/Commercial Traffic (q ₁₀ m ² -s)					
			Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Site	Excavated Dirt to Map Area	Batch Plant Operation	Earth Moving / Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)									
1-24	7-18	7-18	7-18	7-18	1-24	7-18	7-18	7-18	7-18	1-24	7-18	1-24	7-18	7-18	1-24	7-18									
U3AREA	126,360	31			0.00	0.00	0.00	0.00	0.03	0.00	0.95	0.00			0.00				3.852E-07	3.474E-08					
AREA2	178,435	44	0.11	0.00	0.00	0.00	0.00	0.04	0.00	1.34	0.00								3.849E-07	3.062E-08	3.211E-08				
AREA3	95,106	23	0.11	0.00	0.00	0.00	0.00	0.02	0.00	0.71	0.00								3.868E-07	3.916E-08	6.024E-08				
AREA4	235,625	58	0.11	0.00	0.00	0.00	0.00	0.05	0.00	1.77	0.00	0.0023	0.007	0.02	0.00				3.842E-07	2.851E-08	2.431E-08				
AREA5	245,982	61	0.11	0.00	0.00	0.00	0.00	0.05	0.00	1.84	0.00	0.0023	0.006	0.02	0.00				3.840E-07	2.820E-08	2.329E-08				
AREA6	99,198	25	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.006	0.02	0.00				1.270E-08	1.719E-08	5.775E-08				
AREA7	6,000	1	0.00	0.00						0.00	0.00	0.0034	0.00						2.880E-08	4.046E-09					
AREA7	6,000	1.48	0.00	0.00						0.00	0.00									4.046E-09					
AREA7	6,000	1.48	0.00	0.00						0.00	0.00									4.046E-09					
Paved Road	930	0.23	0.00																	4.046E-09					
TOTAL ALL AREAS (TPY)	244	0.56	0.00	0.00	0.00	0.00	0.00	0.18	0.00	6.60	0.01	0.03	0.01	0.01	0.03	0.01	0.11	0.21	0.09						0.000E+00
																						Total =		7.5	

Table A-8 PM₁₀ Annual Emissions for Year 2010

Modeled Area ID	Map Area Iles.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)																
				VEHICLE TRAVEL EMISSIONS			EMissions Distribution (TPY)			Diesel & Gasoline Emissions			TOTAL (q ₁₀ m ² -s)	Commuter/Commercial Traffic (q ₁₀ m ² -s)						
				Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Site	Excavated Dirt to Map Area	Batch Plant Operation	Earth Moving / Excavation	Grading and Compaction	Sand and Aggregate at Barge			Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	
				1-24	7-18	7-18	7-18	7-18	1-24	7-18	7-18	7-18	7-18	1-24	7-18	1-24	7-18	7-18		
U3AREA	Unit 3 Area	126,360	31			0.01	0.05	1.74	0.00	2.51	4.86	0.95	0.16					0.03		
AREA2	1,28.9	178,435	44	0.96	0.01	0.05	1.74	0.00	3.54	6.58	1.34	0.16						0.03		
AREA3	CTCWS,10,11	95,106	23	0.96	0.01	0.05	1.74	0.00	1.89	3.51	0.71	0.16						0.03		
AREA4	3,4,7,12	235,625	58	0.96	0.19	0.01	0.05	2.90	4.67	8.69	1.77	0.16	0.0098	0.018	0.03			0.03		
AREA5	5,13	245,982	61	0.96	0.19	0.01	0.05	3.49	4.86	9.08	1.84	0.16	0.0098	0.015	0.03			0.03		
AREA6	6	99,198	24.5	0.96	0.19	0.01	0.05	0.12		3.66	0.31	0.16	0.06	0.015	0.03			0.03		
AREA7	Barge 1	6,000	1.48		0.05						0.22	0.04	0.0147							
AREA7	Barge 2	6,000	1.48		0.05						0.04									
AREA7	Barge 3	6,000	1.48		0.05						0.04									
AREA7	Barge 4	6,000	1.48		0.05						0.04									
Paved Road	Paved Road	930	0.23	0.073																
TOTAL ALL AREAS (TPY)		244	0.85	0.75	0.05	0.28	11.62	0.12	17.49	36.19	0.22	6.91	1.11	0.11	0.21	0.11	0.21	0.09		
																		Total =		80.0

Table A-9 PM₁₀ Annual Emissions for Year 2011

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)																						
				VEHICLE TRAVEL EMISSIONS				GRAVING/EXCAVATION				Diesel & Gasoline Emissions		TOTAL (g/m ² /s)	Commuter/Commercial Traffic (g/m ² /s)											
Hours of Operations (hours ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewaxing Earthwork	Batch Plant	Concrete			Others (incl. gasoline)										
U3AREA	Unit 3 Area	126,360	31	1.24	7.48	0.01	0.12	1.18	7.48	7.48	2.66	4.77	7.48	0.95	0.17	0.059	0.07	7.48	1.24	7.48	4.896E-06	1.24	7.48	4.896E-06		
AREA2	1,2,8,9	178,435	44	3.03		0.01	0.12	1.18	7.48	7.48	3.75	6.73	7.48	1.34	0.17	0.053	0.07	7.48	1.24	7.48	2.958E-07	1.24	7.48	4.896E-06		
AREA3	CTCWS,10,11	95,106	23	3.03		0.01	0.12	1.18	7.48	7.48	2.00	3.59	7.48	0.71	0.17	0.043	0.07	7.48	1.24	7.48	3.221E-07	1.24	7.48	5.156E-06		
AREA4	3,4,7,12	235,625	58	3.03		0.01	0.12	1.97	7.48	7.48	4.95	8.69	7.48	1.77	0.17	0.0375	0.043	7.48	1.24	7.48	2.917E-07	1.24	7.48	4.896E-06		
AREA5	5,13	245,982	61	3.03		0.01	0.12	2.37	7.48	7.48	5.17	9.28	7.48	1.84	0.17	0.0375	0.043	7.48	1.24	7.48	2.691E-07	1.24	7.48	4.311E-07		
AREA6	6	99,198	24.5	3.03		0.01	0.12		7.48	7.48	0.38	3.74	7.48	0.49	0.17	0.29	0.053	7.48	1.24	7.48	4.622E-07	1.24	7.48	3.030E-06		
AREA7	Barge 1	6,000	1			0.08						0.43			0.04	0.0562										
AREA7	Barge 2	6,000	1.48			0.08									0.04											
AREA7	Barge 3	6,000	1.48			0.08									0.04											
AREA7	Barge 4	6,000	1.48			0.08									0.04											
Paved Road	Paved Road			0.27																						
TOTAL ALL AREAS (TPY)			244	15.44	1.24	0.07	0.73	7.89	7.89	7.89	18.52	37.00	0.13	7.89	1.18	0.42	0.26	0.11								9.505E-03

Table A-10 PM₁₀ Annual Emissions for Year 2012

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)																						
				VEHICLE TRAVEL EMISSIONS				GRAVING/EXCAVATION				Diesel & Gasoline Emissions		TOTAL (g/m ² /s)	Commuter/Commercial Traffic (g/m ² /s)											
Hours of Operations (hours ending)	Commuter and Commercial Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving/Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewaxing Earthwork	Batch Plant	Concrete			Others (incl. gasoline)										
U3AREA	Unit 3 Area	126,360	31	1.24	7.48	0.00	0.09	0.00	7.48	7.48	1.50	1.81	7.48	0.95	0.08	0.097	0.10	7.48	1.24	7.48	3.132E-07	1.24	7.48	1.934E-06		
AREA2	1,2,8,9	178,435	44	3.33		0.00	0.09	0.00	7.48	7.48	2.12	2.55	7.48	1.34	0.08	0.088	0.10	7.48	1.24	7.48	2.964E-07	1.24	7.48	1.904E-06		
AREA3	CTCWS,10,11	95,106	23	3.33		0.00	0.09	0.00	7.48	7.48	1.13	1.36	7.48	0.71	0.08	0.074	0.10	7.48	1.24	7.48	3.218E-07	1.24	7.48	1.968E-06		
AREA4	3,4,7,12	235,625	58	3.33		0.00	0.09	0.00	7.48	7.48	2.80	3.37	7.48	1.77	0.08	0.0527	0.074	7.48	1.24	7.48	2.938E-07	1.24	7.48	1.912E-06		
AREA5	5,13	245,982	61	3.33		0.00	0.09	0.00	7.48	7.48	2.93	3.52	7.48	1.84	0.08	0.0527	0.061	7.48	1.24	7.48	2.905E-07	1.24	7.48	1.909E-06		
AREA6	6	99,198	25	3.33		0.00	0.09		7.48	7.48	0.50	1.42	7.48	0.31	0.08	0.40	0.061	7.48	1.24	7.48	4.796E-07	1.24	7.48	1.192E-06		
AREA7	Barge 1	6,000	1			0.02						0.22			0.02	0.0790										
AREA7	Barge 2	6,000	1.48			0.02									0.02											
AREA7	Barge 3	6,000	1.48			0.02									0.02											
AREA7	Barge 4	6,000	1.48			0.02									0.02											
Paved Road	Paved Road			0.53																						
TOTAL ALL AREAS (TPY)			244	17.18	0.35	0.02	0.53	0.00	0.00	0.00	10.49	14.02	0.22	6.91	0.56	0.59	0.45	0.62								1.851E-02

Table A-11 PM₁₀ Annual Emissions for Year 2013

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)	
				VEHICLE TRAVEL EMISSIONS			GRADING EXCAVATION				Diesel & Gasoline Emissions					
Hours of Operations (hour ending)	Commuter and Commercial Traffic at Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)
	1-24	7-18	7-18	1-24	7-18	1-24	7-18	7-18	7-18	1-24	7-18	1-24	1-24	7-18	1-24	7-18
U3AREA	Unit 3 Area	126,360	31		0.00	0.08	0.00	0.95	0.36	0.56	0.03	0.060	0.10	0.10	2,009E-07	7,966E-07
AREA2	1,2,8,9	178,436	44	4.62	0.00	0.08	0.00	1.34	0.50	0.80	0.03	0.071	0.10	0.10	1,666E-07	7,742E-07
AREA3	TCWS,10,	95,106	23	4.62	0.00	0.08	0.00	0.71	0.27	0.42	0.03	0.057	0.10	0.10	2,066E-07	8,202E-07
AREA4	3,4,7,12	235,625	58	4.62	0.00	0.08	0.00	1.77	0.66	1.05	0.03	0.0527	0.057	0.10	1,849E-07	7,614E-07
AREA5	5,13	245,982	61	4.62	0.00	0.08	0.00	1.65	0.69	1.10	0.03	0.0527	0.043	0.10	1,812E-07	7,598E-07
AREA6	6	99,198	25	4.62	0.00	0.08	0.49	0.28	0.28	0.00	0.03	0.40	0.043	0.10	3,696E-07	2,911E-07
AREA7	Barge 1	6,000	1.48		0.00				0.00	0.01	0.0790				4,601E-07	8,421E-08
AREA7	Barge 2	6,000	1.48		0.00					0.01					8,421E-08	
AREA7	Barge 3	6,000	1.48		0.00					0.01					8,421E-08	
AREA7	Barge 4	6,000	1.48		0.00					0.01					8,421E-08	
Paved Road				0.80												
TOTAL ALL AREAS (TPY)			244	23.89	0.00	0.48	0.49	6.62	2.76	3.94	0.20	0.59	0.35	0.62		2,784E-02
														Total =	40.0	

Table A-12 PM₁₀ Annual Emissions for Year 2014

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)										TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)	
				VEHICLE TRAVEL EMISSIONS			GRADING EXCAVATION				Diesel & Gasoline Emissions					
Hours of Operations (hour ending)	Commuter and Commercial Traffic at Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to Applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (g/m ² -s)	Commuter/Commercial Traffic (g/m ² -s)
	1-24	7-18	7-18	1-24	7-18	1-24	7-18	7-18	7-18	1-24	7-18	1-24	1-24	7-18	1-24	7-18
U3AREA	Unit 3 Area	126,360	31		0.00	0.02	0.00	0.24	0.12	0.95	0.01	0.050	0.09	0.09	2,809E-07	2,548E-07
AREA2	1,2,8,9	178,436	44	1.53	0.00	0.02	0.00	0.34	0.17	1.34	0.01	0.048	0.09	0.09	2,750E-07	2,378E-07
AREA3	TCWS,10,	95,106	23	1.53	0.00	0.02	0.00	0.18	0.09	0.71	0.01	0.045	0.09	0.09	2,655E-07	2,738E-07
AREA4	3,4,7,12	235,625	58	1.53	0.00	0.02	0.00	0.44	0.22	1.77	0.01	0.0098	0.045	0.09	2,728E-07	2,279E-07
AREA5	5,13	245,982	61	1.53	0.00	0.02	0.00	0.46	0.23	1.84	0.01	0.0098	0.042	0.09	2,720E-07	2,266E-07
AREA6	6	99,198	25	1.53	0.00	0.02	0.12	0.09	0.09	0.00	0.01	0.08	0.042	0.09	9,269E-08	1,394E-07
AREA7	Barge 1	6,000	1.48		0.00				0.00	0.00	0.0147				8,565E-08	4,315E-08
AREA7	Barge 2	6,000	1.48		0.00					0.00					4,315E-08	
AREA7	Barge 3	6,000	1.48		0.00					0.00					4,315E-08	
AREA7	Barge 4	6,000	1.48		0.00					0.00					4,315E-08	
Paved Road				0.27												
TOTAL ALL AREAS (TPY)			244	7.90	0.00	0.12	0.12	1.66	0.92	6.60	0.10	0.11	0.27	0.51		9,475E-03
														Total =	16.1	

Table A-13 PM₁₀ Annual Emissions for Year 2015

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)															
				VEHICLE TRAVEL EMISSIONS				GRAADING EXCAVATION				Diesel & Gasoline Emissions							
				Commuter and Commercial at Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to road applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving / Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)		
Hours of Operations (hour ending)				1-24	7-18	7-18	1-24	7-18	7-18	1-24	7-18	7-18	1-24	7-18	1-24	7-18	TOTAL (g/m ² /s)	TOTAL (g/m ² /s)	Commuter/Commercial Traffic (g/m ² /s)
UGAREA	Unit 3 Area	126,360	31		0.00	0.00	0.00	0.00	0.00	0.05	0.00	0.00	0.95	0.00	0.00	0.017	5.210E-08	2.665E-07	5.210E-08
AREA2	1,2,8,9	178,435	44	0.11		0.00	0.00	0.00	0.00	0.07	0.00	0.00	1.34	0.00	0.00	0.017	2.651E-07	2.651E-07	4.541E-08
AREA3	TCWS,10,11	95,106	23	0.11		0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.71	0.00	0.00	0.016	2.675E-07	2.675E-07	5.963E-08
AREA4	3,4,7,12	235,625	58	0.11		0.00	0.00	0.00	0.00	0.10	0.00	0.00	1.77	0.00	0.0046	0.016	2.648E-07	2.648E-07	4.146E-08
AREA5	5,13	245,982	61	0.11		0.00	0.00	0.00	0.00	0.10	0.00	0.00	1.84	0.00	0.0046	0.015	2.645E-07	2.645E-07	4.095E-08
AREA6	6	99,198	25	0.11		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	0.015	1.820E-08	2.921E-08	3.956E-08
AREA7	Barge 1	6,000	1									0.00	0.00	0.0070			4.057E-08	9.872E-09	
AREA7	Barge 2	6,000	1.48										0.00					9.872E-09	
AREA7	Barge 3	6,000	1.48										0.00					9.872E-09	
AREA7	Barge 4	6,000	1.48										0.00					9.872E-09	
Paved Road				0.02															
TOTAL ALL AREAS (TPY)			244	0.58	0.00	0.00	0.00	0.00	0.00	0.37	0.00	0.00	6.60	0.02	0.05	0.09			7.589E-04
															Total =	8.0			

Table A-14 PM₁₀ Annual Emissions for Year 2016

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	Emissions Distribution (TPY)															
				VEHICLE TRAVEL EMISSIONS				GRAADING EXCAVATION				Diesel & Gasoline Emissions							
				Commuter and Commercial at Traffic	Barge to Concrete Plant	Unpaved road construction	Concrete Plant to road applic. Site	Excavated Dirt to Map Area 5	Batch Plant Operations	Earth Moving / Excavation	Grading and Compaction	Sand and Aggregate at Barge	Wind Erosion	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)		
Hours of Operations (hour ending)				1-24	7-18	7-18	1-24	7-18	7-18	1-24	7-18	7-18	1-24	7-18	1-24	7-18	TOTAL (g/m ² /s)	TOTAL (g/m ² /s)	Commuter/Commercial Traffic (g/m ² /s)
UGAREA	Unit 3 Area	126,360	31		0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00	0.95	0.00	0.00	0.007	2.639E-07	2.639E-07	2.513E-08
AREA2	1,2,8,9	178,435	44	0.11		0.00	0.00	0.00	0.00	0.04	0.00	0.00	1.34	0.00	0.00	0.007	2.632E-07	2.632E-07	2.199E-08
AREA3	TCWS,10,11	95,106	23	0.11		0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.71	0.00	0.00	0.007	2.642E-07	2.642E-07	4.126E-08
AREA4	3,4,7,12	235,625	58	0.11		0.00	0.00	0.00	0.00	0.05	0.00	0.00	1.77	0.00	0.0023	0.007	2.631E-07	2.631E-07	1.665E-08
AREA5	5,13	245,982	61	0.11		0.00	0.00	0.00	0.00	0.05	0.00	0.00	1.84	0.00	0.0023	0.006	2.630E-07	2.630E-07	1.595E-08
AREA6	6	99,198	25	0.11		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.006	0.02	8.699E-09	1.344E-08	3.956E-08
AREA7	Barge 1	6,000	1									0.00	0.00	0.0034			1.972E-08	2.771E-09	
AREA7	Barge 2	6,000	1.48										0.00					2.771E-09	
AREA7	Barge 3	6,000	1.48										0.00					2.771E-09	
AREA7	Barge 4	6,000	1.48										0.00					2.771E-09	
Paved Road				0.00															
TOTAL ALL AREAS (TPY)			244	0.56	0.00	0.00	0.00	0.00	0.00	0.18	0.00	0.00	6.60	0.01	0.03	0.04			0.000E+00
															Total =	7.5			

Table A-15 CO and SO₂ Short-Term Emissions for Year 2011

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	MODELED CO EMISSIONS				MODELED SO ₂ EMISSIONS					
				Diesel & Gasoline Emissions				Diesel & Gasoline Emissions					
				Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (q/m ² /s)	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (q/m ² /s)
Hours of Operations (hour ending)				7-18	1-24	1-24	7-18	7-18	1-24	1-24	7-18	7-18	
U3AREA	Unit 3 Area	126,360	31	0.82	1.172	4.96	4.731E-07	4.675E-06	0.10	0.190	0.16	7.263E-08	2.129E-07
AREA2	1,2,8,9	178,436	44	0.82	1.084	4.96	3.098E-07	3.310E-06	0.10	0.162	0.16	4.620E-08	1.507E-07
AREA3	CTCWS,10,11	95,106	23	0.82	0.951	4.96	5.103E-07	6.211E-06	0.10	0.134	0.16	7.195E-08	2.828E-07
AREA4	3,4,7,12	235,625	58	0.82	0.5521	4.96	3.255E-07	2.507E-06	0.10	0.0666	0.134	4.347E-08	1.142E-07
AREA5	5,13	245,982	61	0.82	0.5521	4.96	2.844E-07	2.401E-06	0.10	0.0666	0.107	3.594E-08	1.093E-07
AREA6	6	99,198	25	0.82	1.3830	4.96	1.132E-06	5.955E-06	0.10	0.1653	0.107	1.399E-07	2.712E-07
AREA7	Barge 1	6,000	1	0.21	0.8281		7.041E-06	3.503E-06	0.03	0.0999		8.498E-07	4.442E-07
AREA7	Barge 2	6,000	1.48	0.21				3.503E-06	0.03				4.442E-07
AREA7	Barge 3	6,000	1.48	0.21				3.503E-06	0.03				4.442E-07
AREA7	Barge 4	6,000	1.48	0.21				3.503E-06	0.03				4.442E-07
				5.77	3.32	5.80	29.79		0.73	0.40	0.82	0.95	
Total =							44.7						2.9

Table A-16 NOx and SO₂ Annual Emissions for Year 2011

Modeled Area ID	Map Area Nos.	Modeled Area (m ²)	Assigned Acreage	MODELED NOx EMISSIONS				MODELED SO ₂ EMISSIONS					
				Diesel & Gasoline Emissions				Diesel & Gasoline Emissions					
				Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (q/m ² /s)	Dewatering & Earthwork	Batch Plant	Concrete	Others (incl. gasoline)	TOTAL (q/m ² /s)
Hours of Operations (hour ending)				7-18	1-24	1-24	7-18	7-18	1-24	1-24	7-18	7-18	
U3AREA	Unit 3 Area	126,360	31	6.65	2.721	2.79	7.524E-07	5.223E-06	0.27	0.113	0.11	3.129E-08	2.085E-07
AREA2	1,2,8,9	178,436	44	6.65	2.381	2.79	4.662E-07	3.699E-06	0.27	0.099	0.11	1.947E-08	1.477E-07
AREA3	CTCWS,10,11	95,106	23	6.65	1.871	2.79	6.874E-07	6.940E-06	0.27	0.079	0.11	2.896E-08	2.770E-07
AREA4	3,4,7,12	235,625	58	6.65	1.2905	2.79	4.688E-07	2.801E-06	0.27	0.0513	0.079	1.929E-08	1.118E-07
AREA5	5,13	245,982	61	6.65	1.2905	2.79	3.767E-07	2.683E-06	0.27	0.0513	0.058	1.555E-08	1.071E-07
AREA6	6	99,198	25	6.65	3.0876	2.79	1.567E-06	6.663E-06	0.27	0.1259	0.058	6.485E-08	2.656E-07
AREA7	Barge 1	6,000	1	1.66	1.9357		1.127E-05	1.936E-05	0.07	0.0769		4.477E-07	7.846E-07
AREA7	Barge 2	6,000	1.48	1.66				1.936E-05	0.07				7.846E-07
AREA7	Barge 3	6,000	1.48	1.66				1.936E-05	0.07				7.846E-07
AREA7	Barge 4	6,000	1.48	1.66				1.936E-05	0.07				7.846E-07
				46.54	7.60	11.57	16.77		1.89	0.31	0.49	0.65	
Total =							82.5						3.3

Appendix B

Construction Emissions Calculations

Table B-1 Unpaved Road Emissions Calculation

UNPAVED ROADS											
Item No.	Construction Activity	Operation Type	Mean vehicle weight (tons)	Units	2010	2011	2012	2013	2014	2015	TOTAL
11	Building Excavation	Haul to Stockpile	20.4	VMT	546,000	-	-	-	-	-	546,000
15	Structural Backfill	Haul to Power Block	20.4	VMT	-	447,000	-	-	-	-	447,000
23	Unpaved Construction	Motor Grading	29	VMT	2,500	3,800	2,500	1,300	-	-	10,100
26	Concrete Operations	Mat. Trans. Barge to	51.2	VMT	35,200	70,380	35,200	-	-	-	140,780
29	Concrete Operations	Ready Mix Transport	28.0	VMT	13,300	41,200	54,000	52,800	13,200	-	174,500
31	Vehicle Traffic	Commuters	2	VMT	205,000	838,000	1,670,000	2,536,000	863,000	69,000	6,181,000
33	Vehicle Traffic	Commercial	2	VMT	19,400	21,700	14,500	2,730	350	-	58,680
				EF lb/VMT	PM ₁₀	1.22	1.01	0.56	0.52	0.51	0.46
11	Building Excavation	Haul to Stockpile		tpy PM ₁₀	11.62	-	-	-	-	-	-
15	Structural Backfill	Haul to Power Block		tpy PM ₁₀	0.00	7.89	-	-	-	-	-
23	Unpaved Construction	Motor Grading		tpy PM ₁₀	0.05	0.07	0.02	0.01	-	-	-
26	Concrete Operations	Mat. Trans. Barge to Batch Plant		tpy PM ₁₀	0.75	1.24	0.35	-	-	-	-
29	Concrete Operations	Ready Mix Transport (CP tp app site)		tpy PM ₁₀	0.28	0.73	0.53	0.48	0.12	-	-
31	Vehicle Traffic	Commuters		tpy PM ₁₀	4.36	14.79	16.51	23.07	7.63	0.56	0.56
33	Vehicle Traffic	Commercial		tpy PM ₁₀	0.41	0.38	0.14	0.02	0.00	-	-
				Total	17.48	25.10	17.56	23.58	7.75	0.56	0.56

$$E \text{ (lb/VMT)} = k * (s/12)^a * (W/3)^b$$

k (PM ₁₀)	1.5	Particle size multiplier, lb/VMT
s	4.0	Surface Material silt content, g/m ² , Sand and Gravel Processing from AP-42 Table 13.2.2-1; used lower end.
a	0.9	exponent
b	0.45	exponent

W	Mean vehicle weight, tons	2010	2011	2012	2013	2014	2015
		16.9	11.2	3.1	2.6	2.4	2.0

Watering efficiency	95%
Gravelling efficiency	30%

Table B-2 Paved Road Emissions Calculation

PAVED ROADS										
Item No.	Construction Activity	Operation Type	Units	2010	2011	2012	2013	2014	2015	TOTAL
3	Vehicle Traffic	Commuters	VMT	44,000	178,500	355,400	539,900	183,900	14,700	1,316,400
33	Vehicle Traffic	Commercial	VMT	5,460	6,100	4,080	760	100	0	16,500

$E (lb/VMT) = k * (sL/2)^{0.65} * (W/3)^{1.5} * C * (1 - (P / (4 N)))$	
k (PM ₁₀)	0.016
k (PM _{2.5})	0.0024
sL	3
W	2
C (PM ₁₀)	0.00047
C (PM _{2.5})	0.00036
P	140
N	365
watering/flushing efficiency	70.00%
1-(P/(4N))	0.90411
	0.90411 0.90411 0.90411 0.90411 0.90411 0.90411

Particle size multiplier, lb/VMT
 Particle size multiplier, lb/VMT
 Road surface silt content, g/m², Air Pollution Engineering Manual, 2nd Ed. AWWMA.
 Mean vehicle weight, tons
 Exhaust, break wear, & tire wear correction, lb/VMT
 Exhaust, break wear, & tire wear correction, lb/VMT
 Number of days of 0.01 inch of precipitation or greater (Figure 13.2.1-2)
 Number of days in averaging period

Uncontrolled	EF	2010	2011	2012	2013	2014	2015
lb/VMT		ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr
PM ₁₀	0.011	0.27	1.00	1.95	2.94	1.00	0.08
PM _{2.5}	0.0013	0.03	0.12	0.24	0.36	0.12	0.01

Controlled (1)	EF	2010	2011	2012	2013	2014	2015
lb/VMT		ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr
PM ₁₀	0.01	0.07	0.27	0.53	0.80	0.27	0.02
PM _{2.5}	0.0012	0.01	0.03	0.07	0.10	0.03	0.00

Note: (1) Only the annual emissions have the control efficiency of precipitation built in them

Table B-3 Material Transfer Emissions Calculation

BATCH DROP OPERATIONS											
Item No.	Construction Activity	Operation Type	Material	Units	2010	2011	2012	2013	2014	2105	TOTAL
4	Scrapers unloading topsoil	Batch Drop	Earth	Tons	310,000	0	0	0	0	0	310,000
7	Scrapers unloading overburden as fill	Batch Drop	Earth	Tons	2,158,000	2,158,000	644,000	0	0	0	4,960,000
10	Load Excavated Mat'l into Trucks	Batch Drop	Earth	Tons	3,410,000	0	0	0	0	0	3,410,000
12	Truck-Dump	Batch Drop	Earth	Tons	3,410,000	0	0	0	0	0	3,410,000
14	Load Stockpile into Off-Road Truck	Batch Drop	Earth	Tons	0	2,790,000	0	0	0	0	2,790,000
16	Truck-Dump	Batch Drop	Earth	Tons	0	2,790,000	0	0	0	0	2,790,000
25	Material Transfer from Barge	Batch Drop	Aggregates	Tons	198,800	397,600	198,800	0	0	0	795,200
		Batch Drop	Sand	Tons	152,218	304,436	152,218	0	0	0	608,872

AP-42 Section 13.2.4-3 Aggregate Handling and Storage Piles
 $E \text{ (lb/ton)} = 0.0032 * k * (U/5)^{1.3} / (M/2)^{1.4}$

$k \text{ (PM}_{10}\text{)} = 0.35$
 $k \text{ (PM}_{2.5}\text{)} = 0.053$
 $U = 6.2$
 $M \text{ (earth)} = 3.4$
 $M \text{ (aggregates)} = 1.77$
 $M \text{ (sand)} = 4.17$

miles per hour, Based on average of hourly values over multiyear period from CCNPP on-site monitor.
 %, Average moisture content Based on AP-42 Table 13.2.4-1 mean moisture content for exposed ground
 %, moisture content based on AP-42 Table 11.2.-2 footnote b
 %, moisture content based on AP-42 Table 11.2.-2 footnote b

	EF	2010	2011	2012	2013	2014	2015
	lb/ton	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr	ton/yr
earth grading	PM ₁₀	7.05E-04	0.87	0.76	0.23	-	-
earth moving	PM ₁₀	7.05E-04	2.40	1.97	-	-	-
aggregates	PM ₁₀	1.76E-03	0.17	0.35	0.17	-	-
sand	PM ₁₀	5.30E-04	0.04	0.08	0.04	-	-
TOTAL	PM ₁₀		3.49	3.16	0.44	-	-

Table B-4 Site Preparation Emissions Calculation

BULLDOZING GRADING COMPACTION												
Item No.	Construction Activity	Operation Type	Units	2010	2011	2012	2013	2014	2015	2016	TOTAL	
Bulldozing												
1	Vegetation Removal	Bulldozing (w/Item 8)	Hours									
8	Bulldozing	Includes Items 1, 13, and 17	Hours/year	8,200	9,000	5,700	3,600	900	200	100	27,600	
13	Spread material	Bulldozing (w/Item 8)	Hours									
17	Spread material	Bulldozing (w/Item 8)	Hours									
	EMISSIONS (PM10)	Units of Lb/year		30,168	33,111	20,970	13,244	3,311	736	368	101,541	
Grading												
2	Scrapers removing topsoil		Tons	310,000	0	0	0	0	0	0	310,000	
5	Scrapers removing overburden		Tons	2,158,000	2,158,000	644,000	0	0	0	0	4,960,000	
23	Motor Grading		VMT	2,500	3,800	2,500	1,300	0	0	0	10,100	
	Predicted hours of operation for Items 2, 5, 23		Hours/year	14,000	14,500	4,900	500	0	0	0	33,900	
	EMISSIONS (PM10)	Units of Lb/year		51,506	53,346	18,027	1,840	0	0	0	124,719	
Compaction												
9	Compaction	Includes Items 18, 24	Hours/year	5,200	5,200	2,600	1,000	500	0	0	14,500	
18	Compaction	Included with Item 9	Hours									
24	Compaction	Included with Item 9	Hours									
	EMISSIONS (PM10)	Units of Lb/year		19130.941	19130.941	9565.4706	3679.0272	1839.5136	0	0	53345.89383	
Bulldozing												
	EMISSIONS (PM10)	Units		15.08	16.56	10.49	6.62	1.66	0.37	0.18		
Grading												
	EMISSIONS (PM10)	Units		25.75	26.67	9.01	0.92	0.00	0.00	0.00		
Compaction												
	EMISSIONS (PM10)	Units		9.57	9.57	4.78	1.84	0.92	0.00	0.00		
	Total	Total		50.40	52.79	24.28	9.38	2.58	0.37	0.18		

Mojava Desert Air Quality Management District Emissions Inventory Guidance Method D Bulldozing, Scraping, and Grading

$$E_f (\text{lb/hr}) = 2.76 * k * (s^{*1.5} / M^{*1.4})$$

k (PM₁₀) = 0.36

s = 7.5

M = 3.4

Ef (PM10) = 3.679 lb/hr

%, Average silt content Based on AP-42 Table 13.2.4-1 mean silt content for overburden
 %, Average moisture content Based on AP-42 Table 13.2.4-1 mean moisture content for exposed ground

Table B-5 Wind Erosion Emissions Calculation – Open Areas

Activity Data and Yearly Emissions from Wind Erosion						
Wind Erosion	2010	2011	2012	2013	2014	2015
	acres	acres	acres	acres	acres	acres
Total Disturbed Acreage	218	218	218	130	70	70
Uncontr. Emis. Factor (lb/ac/dy)	PM-10 Emis Uncontr. (lb/day)					
	2010	2011	2012	2013	2014	2015
	1.66	361.9	361.9	215.8	116.2	116.2
Moisture Control Eff. (%)	PM-10 Emis Controlled. (TPY)					
	2010	2011	2012	2013	2014	2015
	90%	6.6	6.6	3.9	2.1	2.1

¹ Uncontrolled emission factor for windblown dust from the Clark County Department of Air Quality and Environmental Management (DAQEM). Sufficient water will be added to maintain a 3% moisture content at the surface. DAQEM data indicate that 3% moisture produces over 90% reduction in uncontrolled emissions. Lack of data on PM-2.5 emissions led to the conservative assumption that PM-2.5 emissions are the same as PM-10 emissions.

* Table 5.5-1 from the CPCN application. This table provides a summary of the construction activity data provided by Bechtel, the design firm for CCNPP Unit 3

Table B-6 Wind Erosion Emissions Calculation – Storage Piles

To Calculate the area of the SAND storage piles							
		2010	2011	2012	2013	2014	2015
Aggregate deliveries by Barge	Tons	198,800	397,600	198,800	0	0	0
Lbs of Sand required		304,435,817.69	608,871,635.39	304,435,817.69	0	0	0
Density of Sand (lbs/cu.yd)		2,633	2,633	2,633	2,633	2,633	2,633
Volume of Sand Required (cu.yd)		115,623.17	231,246.35	115,623.17	0	0	0
Using a 1:3 ratio for h:base --- Height		36.61	46.13	36.61	0	0	0
Base		109.83	138.38	109.83	0	0	0
Slope (s)		66.00	83.16	66.00	0	0	0
Curved surface area (exposed) (square yards)		11,386.89	18,075.57	11,386.89	0	0	0

		PM10					
		2010	2011	2012	2013	2014	2015
Units							
TONS	E =	0.12	0.20	0.12	0	0	0
tons/acre	E _r =	0.053	0.053	0.053	0.053	0.053	0.053
Watering Control efficiency	e =	90%	90%	90%	90%	90%	90%
	J =	0.5	0.5	0.5	0.5	0.5	0.5
%	sL =	6	6	6	6	6	6
days	P =	140	140	140	140	140	140
%	I =	13.3	13.3	13.3	13.3	13.3	13.3
acres	A =	2.35	3.72	2.35	0	0	0

To Calculate the area of the AGGREGATE storage piles							
		2010	2011	2012	2013	2014	2015
Aggregate deliveries by Barge	Tons	198,800	397,600	198,800	0	0	0
Lbs of Aggregate required (Lbs)		519,274,509.80	1,038,549,019.61	519,274,509.80	0	0	0
Density of Aggregate (lbs/cu.yd)		2,498	2,498	2,498	2,498	2,498	2,498
Volume of Sand Required (cu.yd)		207,876.10	415,752.21	207,876.10	0	0	0
Using a 1:3 ratio for h:base --- Height (yards)		44.52	56.09	44.52	0	0	0
Base (yards)		133.55	168.27	133.55	0	0	0
Slope (s) (yards)		80.26	101.12	80.26	0	0	0
Curved surface area (exposed) (square yards)		16,836.24	26,725.86	16,836.24	0	0	0

		PM10					
		2010	2011	2012	2013	2014	2015
Units							
TONS	E =	0.18	0.29	0.18	0	0	0
tons/acre	E _r =	0.053	0.053	0.053	0.053	0.053	0.053
Watering Control efficiency	e =	90%	90%	90%	90%	90%	90%
	J =	0.5	0.5	0.5	0.5	0.5	0.5
%	sL =	6	6	6	6	6	6
days	P =	140	140	140	140	140	140
%	I =	13.3	13.3	13.3	13.3	13.3	13.3
acres	A =	3.47	5.51	3.47	0	0	0

Mojave Desert Air Quality Management District Emissions Inventory Guidance Method G Wind Erosion from Stockpiles

$$E = E_r * A$$

$$E_r = J * 1.7 * (sL/1.5) * (365-P)/235 * (I / 15) * (365/2000)$$

E_r = Emission factor (tons/acre)
 J = particulate aerodynamic factor
 sL = silt loading
 P = Average number of days in a year with at least 0.01 inches of precipitation
 I = Percentage of time with unobstructed wind speed > 12 mph in %
 A = Exposed surface area of stockpiles in acres

Table B-7 Concrete Batch Plant Emissions Calculation

Activity Data and Maximum Emissions from Concrete Batch Plants

Plant Data	
Maximum Concrete Production Plants	number 1
Maximum Production Rate per Concrete Batch Plant	cu. yds/hr 200 based on total concrete production for 1 plant from original calculations
Annual Avg. Production Rate	cubic yds/year 125,000
Annual Max. Production Rate	cubic yds/year 206,061

Cement and cement amendments pneumatic transfer from truck to silos vent thru 99% efficient baghouse

	2010	2011	2012	2013	2014	2015
Total Concrete Schedule (CY)	42250	131,000	171,750	168,000	42,000	0

Emissions

Based on Plant Wide PM-10 Emission Factors for Concrete Plants from AP-42 Table 11.12-3 and the controlled truck loading PM-10 factor in Table 11.12-2; PM-2.5=PM-10 for controlled silo cement unloading, PM-2.5/PM-10 ratio from Table 11.12-3 for truck loading, and PM-2.5/PM-10 ratio from Section 13.2.4 for other categories. A control efficiency of 90% was applied for watering to those material transfer activities without control.

Activity	PM-10 lbs/cu. yd	PM-2.5 lbs/cu. yd	PM-10 lbs/cu. yd	HOURLY		PM-10 (tons/year)					
				PM-10 lbs/hr	PM-2.5 lbs/hr	2010	2011	2012	2013	2014	2015
Aggregate delivery to ground	0.00031	0.00005	0.06	0.01	0.002	0.007	0.020	0.027	0.026	0.007	0.000
Sand delivery to ground	0.00007	0.00001	0.01	0.002	0.002	0.001	0.005	0.006	0.006	0.001	0.000
Aggregate transfer to conveyor	0.00031	0.00005	0.06	0.01	0.002	0.007	0.020	0.027	0.026	0.007	0.000
Sand transfer to conveyor	0.00007	0.00001	0.01	0.002	0.002	0.001	0.005	0.006	0.006	0.001	0.000
Sand transfer to elevated storage	0.00007	0.00001	0.01	0.002	0.002	0.001	0.005	0.006	0.006	0.001	0.000
Cement delivery to silo (controlled)	0.0001	0.0001	0.02	0.02	0.002	0.002	0.007	0.009	0.008	0.002	0.000
Cement supplement to silo (controlled)	0.0002	0.0002	0.04	0.04	0.004	0.013	0.013	0.017	0.017	0.004	0.000
Weight Hopper loading (controlled)*	0.0002	0.00003	0.05	0.01	0.005	0.015	0.015	0.020	0.019	0.005	0.000
Truck loading (controlled)*	0.0045	0.0008	0.90	0.16	0.095	0.296	0.296	0.387	0.379	0.095	0.000
Totals			1.17	0.25	0.12	0.38	0.50	0.49	0.12	0.00	0.00

*Based on applying controls to achieve the 94+% reduction in PM-10 emissions reflected in the AP-42 controlled emission factor in Table 11.12-2 for truck loading.

Table B-8a Combustion Equipment Emissions Calculation

EQUIPMENT CATEGORY	FUEL TYPE	DESCRIPTION	QTY	MOTOR SIZE (HP)	MOTOR EFFICIENCY (%)	COMBINED YEARLY TOTAL HOURS OF USE							EMISSION FACTORS (lb/hr)	EMISSIONS (lb/yr)	APPROX. TAP	TAP	EMISS. TAP	TAP			
						1	2	3	4	5	6	7									
DIESEL ENGINES & EQUIPMENT	Diesel	Generator, 500 KW	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Diesel	Generator, 250 KW	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Diesel	Generator, 150 KW	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Diesel	Generator, 75 KW	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Diesel	CAT 330 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 320 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 310 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 300 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 290 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 280 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
	Diesel	CAT 270 Excavator	4	410	7000	5200	5200	5200	1500	0	0	0	2	0.387	0.395	0.215	4.335	0.1316	None	0.43	1.20
CONCRETE	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Concrete	Batch Plant	1	1000	9000	9000	9000	9000	9000	9000	9000	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
LUBRICANTS	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Lubricant	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
EQUIPMENT MAINTENANCE	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20
	Equipment	Generator	1	450	687	1000	1000	1000	0	0	0	0	2	0.387	0.395	0.215	4.000	0.1316	None	0.43	1.20

Table B-8b Combustion Equipment Emissions Calculation (cont.)

EQUIPMENT CATEGORY	FUEL	DESCRIPTION	ANNUAL EMISSIONS (lb)						ANNUAL EMISSIONS (lb)						ANNUAL EMISSIONS (lb)						ANNUAL EMISSIONS (lb)								
			HC	CO	NO _x	PM	SO ₂	Pb	HC	CO	NO _x	PM	SO ₂	Pb	HC	CO	NO _x	PM	SO ₂	Pb	HC	CO	NO _x	PM	SO ₂	Pb			
EQUIPMENT CATEGORY	Diesel	Generator 400 kW @ 100% Capacity	1.60	4.15	24.13	0.75	0.70	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
		Generator 400 kW @ 75% Capacity	1.20	3.11	18.10	0.56	0.53	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
		Generator 400 kW @ 50% Capacity	0.80	2.08	12.07	0.37	0.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 400 kW @ 25% Capacity	0.40	1.04	6.04	0.18	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 200 kW @ 100% Capacity	0.80	2.08	12.07	0.37	0.35	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 200 kW @ 75% Capacity	0.60	1.56	9.05	0.28	0.26	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		Generator 200 kW @ 50% Capacity	0.40	1.04	6.04	0.18	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 200 kW @ 25% Capacity	0.20	0.52	3.02	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		Generator 100 kW @ 100% Capacity	0.40	1.04	6.04	0.18	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		Generator 100 kW @ 75% Capacity	0.30	0.78	4.53	0.13	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		Generator 100 kW @ 50% Capacity	0.20	0.52	3.02	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
		Generator 100 kW @ 25% Capacity	0.10	0.26	1.51	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 50 kW @ 100% Capacity	0.20	0.52	3.02	0.09	0.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 50 kW @ 75% Capacity	0.15	0.39	2.27	0.06	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
		Generator 50 kW @ 50% Capacity	0.10	0.26	1.51	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

UN#09-396

Enclosure 3
Regulatory Commitment

UN#09-396

The regulatory commitment in this correspondence is summarized below:

Regulatory Commitment No.	Regulatory Commitment Description	Regulatory Commitment Due Date
CC-09-0002	UNE will prepare an updated construction emissions analysis for CCNPP Unit 3 in order to determine if emissions are still within threshold values. UNE will provide the NRC with the schedule for completion of this emissions analysis by October 2, 2009.	October 2, 2009 schedule for completion of analysis.