



*KPC EHS Consultants*

## Technical Memorandum

**To:** EPC Consulting, Ernest Perea

**From:** Kevin P. Carr, MS., KPC EHS Consultants

**Date:** August 12, 2023

**Re:** Cassia & Daisy Industrial Development Project - Air Quality

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### 1.0 Purpose

The purpose of this memorandum is to document the impacts of construction, mobile, and operational air quality (AQ) and greenhouse gas (GHG) emissions as it relates to the potential environmental impacts associated with the construction and operation of the proposed industrial project on approximately 9.11 acres.

### 2.0 Project Location & Description

- 2.1 Project Location:** The proposed project site is located in the City of Adelanto, San Bernardino, California on the southeast corner of Cassia Road and Daisy Road, and is referred to as APN: 3128-111-06.
- 2.2 Description:** The Applicant is proposing to develop twelve (12) 10,000 square foot (sf) industrial buildings with associated parking, water quality basins, and landscaping on an approximately 9.11-acre vacant parcel.

### 3.0 Air Quality & Assessment

- 3.1 Determination of Significance:** The criteria used to determine the significance related to potential Project related air quality impacts is based on the California Environmental Quality Act (CEQA) Environmental Checklist, Appendix G Thresholds:

#### 3.1.1 Air Quality Impacts:

Would the Project: Conflict with or obstruct implementation of the applicable air quality plan?

Would the Project: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Would the Project: Expose sensitive receptors to substantial pollutant concentrations?

Would the Project: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

### 3.1.2 Air Quality Thresholds:

The Mojave Desert Air Quality Management District (MDAQMD) has developed regional significance thresholds for regulated pollutants. The MDAQMD's CEQA Guidelines provide significance thresholds as indicted in Table 3.1 below.

**Table 3.1 – Emissions Significance Thresholds**

Criteria Pollutant / Emission	Annual Threshold (Tons)	Daily Threshold (pounds)
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO <sub>x</sub> )	25	137
Reactive Organic Gases (ROG)	25	137
Sulfur Oxides (SO <sub>x</sub> )	25	137
Particulate Matter 10 microns (PM <sub>10</sub> )	15	82
Particulate Matter 2.5 microns (PM <sub>2.5</sub> )	12	65

### 3.2 Construction Emissions:

Construction emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod) 2022.1.1.16, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the Mojave Desert Air Quality Management District (MDAQMD). Construction emissions are summarized in Table 3.2 for maximum daily summer emissions and Table 3.3 for maximum daily winter emissions.

The original Project construction emissions were based on CalEEMod Land Uses for 120,000 square foot "Industrial Park" and parking.

Construction modeling was estimated using a CalEEMod default for 279-work day construction schedule, with default values for off-road construction equipment. Construction emissions phases include site preparation, grading, building construction, architectural coating, and paving schedules. Peak emissions represent the highest value from the summer or winter modeling as a worse-case scenario. MDAQMD significance thresholds were used for determining the project's impacts.

**Table 3.2 – Original Summary of Peak Construction Emissions (Without Mitigation)\***

Year	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2024	1.52	12.2	18.0	0.03	1.33	0.67
<b>Maximum Daily Emissions</b>	<b>1.52</b>	<b>12.2</b>	<b>18.0</b>	<b>0.03</b>	<b>1.33</b>	<b>0.67</b>
MDAQMD Regional Threshold	137	137	548	137	82	65
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

\* MDAQMD Fugitive Dust Rules Applied.

Source: CalEEMod Datasheets, Appendix A

**Table 3.3 – Updated Summary of Peak Construction Emissions (Without Mitigation)\***

Year	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2023	4.04	39.9	36.6	0.05	9.7	5.65
2024	31.9	18.3	19.7	0.03	3.8	2.15
2025	31.9	0.94	1.7	<0.005	0.16	0.06
<b>Maximum Daily Emissions</b>	<b>31.9</b>	<b>39.9</b>	<b>36.6</b>	<b>0.05</b>	<b>9.7</b>	<b>5.65</b>
MDAQMD Regional Threshold	137	137	548	137	82	65
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

\* MDAQMD Fugitive Dust Rules Applied.

Source: CalEEMod Datasheets, Appendix A

As indicated in Tables 3.2 and 3.3 the proposed Project and the project emissions are estimated to be below the MDAQMD Thresholds.

### 3.3 Operational Emissions:

Operational emissions for the Project were estimated by using the California Emissions Estimator Model (CalEEMod) which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies to quantify potential criteria pollutant emissions associated with both construction and operations emissions. CalEEMod is authorized for use to assess project emissions by the Mojave Desert Air Quality Management District (MDAQMD). Operations emissions include stationary (facility emissions), mobile (transportation emissions from employees and trucks), and area ( on-going architectural coatings, consumer product use, landscaping maintenance emissions). Default CalEEMod values were used for the modeling of operations emissions. MDAQMD significance thresholds were used for determining the project’s impacts. Operation emissions are summarized in Table 3.4.

#### 3.3.2 On-Site Equipment Emissions

Industrial projects commonly require cargo handling equipment (CHE) to move supplies to and from trailers that receive and distribute containers. The most common type of cargo handling equipment for Industrial Developments similar to the proposed Project will be forklifts and pallet jacks. For purposes of the air quality assessment forklifts and pallet jacks are assumed to be electric consistent with industry standards.

**Table 3.4 - Summary of Peak Operational Emissions**

Operational Activities – Summer	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	3.58	0.04	5.22	<0.005	0.01	0.01
Energy Source	0.05	0.88	0.74	0.01	0.07	0.07
Mobile	2.35	2.71	25.3	0.06	4.89	1.27
<b>Total Maximum Daily Emissions</b>	<b>5.99</b>	<b>3.64</b>	<b>31.3</b>	<b>0.07</b>	<b>4.97</b>	<b>1.35</b>
MDAQMD Regional Threshold	137	137	548	137	82	65
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>
Operational Activities – Winter	Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Source	2.73	<0.005	<0.005	<0.005	<0.005	<0.005
Energy Source	0.05	0.88	0.74	0.01	0.13	0.13
Mobile	2.08	2.93	19.1	0.05	4.89	1.27
<b>Total Maximum Daily Emissions</b>	<b>4.86</b>	<b>3.81</b>	<b>19.8</b>	<b>0.06</b>	<b>5.02</b>	<b>1.4</b>
MDAQMD Regional Threshold	137	137	548	137	82	65
<b>Threshold Exceeded?</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>	<b>NO</b>

Source: CalEEMod Datasheets Appendix A.

As indicated in Table 3.4 the projects estimated operational emissions are below the MDAQMD significance thresholds.

### 3.4 Objectionable Odors:

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The Project does not propose or require land uses that would be substantive sources of objectionable odors. Potential temporary and intermittent odors may result from construction equipment exhaust, the application of asphalt and architectural coatings. Temporary and intermittent construction-source emissions are controlled through existing requirements and industry BMPs addressing proper storage and application of construction materials.

Over the life of the Project, odors may result from storage of municipal solid waste pending its transport to area landfills. Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations.

The proposed Project would involve the use of diesel-powered construction equipment and diesel-powered vehicles pulling trailers for deliveries during operations. Diesel exhaust during construction may be noticeable temporarily at adjacent properties; however, construction activities would be temporary. During operations diesel vehicles entering the site are required to limit idling to less than 5-minutes which will reduce the impacts of diesel odors.

The proposed Project would also be required to comply with MDAQMD Rule 402. Rule 402 provides that "[a] person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." Based on the preceding, the potential for the Project to create objectionable odors affecting a substantial number of people is considered less-than- significant.

### **3.5 CO "Hotspot" Analysis**

As discussed below, the Project would not result in potentially adverse CO concentrations or "hotspots." Further, detailed modeling of Project-specific carbon monoxide (CO) "hot spots" is not needed to reach this conclusion.

The Basin is designated attainment under the CAAQS and NAAQS for CO. An adverse CO hotspot would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

It has long been recognized that CO hotspots are caused by vehicular emissions, primarily when idling at congested intersections. Due to changing regulations vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin have steadily declined.

The SCAQMD as part of their 2003 AQMP conducted modeling for CO Hotspot Analysis at multiple congested intersections in their South Coast Air Basin including the intersection of Wilshire Boulevard and Veteran Avenue- considered one of the most congested intersections in Southern California with an ADT of approximately 100,000 vehicles. The CO concentrations modeled by the SCAQMD's analysis identified all traffic induced CO levels below Federal and State thresholds. As the CO hotspots were not modeled at an intersection that accommodates over 100,000 vehicles per day, it can be reasonably deduced that CO hotspots would not be experienced at any intersections in the vicinity of the proposed project.

The project would be approximately 1.5 miles east of State Highway 395 as the major traffic route. As shown in 2020 Traffic Volumes on California State Highways (Caltrans 2020), average daily trips (ADT) are 22,700 on State Highway 395. As shown in the CalEEMod Datasheets prepared for the Project, the project would generate approximately 404 average daily trips on weekdays, and 305 tips on Saturdays which is nominal representing an approximately 1.34 % increase compared to traffic on State Highway 395. Therefore, the project would not contribute a significant increase in traffic to the adjacent roadways and would not cause an impact to intersection operations.

Given the extremely low level of CO concentrations in the project area and no project-traffic related impacts at any intersections, project-related vehicle emissions are not expected to result in the CO concentrations exceeding the State or federal CO standards.

### 3.6 Cumulative Impacts

#### Air Quality Cumulative Impacts

The MDAQMD relies on the SCAQMD guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects.

The SCAQMD published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (22). In this report the AQMD clearly states (Page D-3):

*“...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.*

*Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.”*

Individual projects that do not generate operational or construction emissions that exceed the MDAQMD’s recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air

quality impact. As previously noted, the Project construction-source and operational-source air pollutant emissions would not exceed applicable MDAQMD regional thresholds. As such, Project construction and operational-source emissions are considered less than significant.

#### **4.0 MDAQMD Rules**

The Mojave Desert Air Quality Management District maintains a set of Rules & Regulations to improve and maintain healthy air quality for the entire population within their jurisdiction. When developing new regulations, the MDAQMD must comply with complex procedures established by statutes in federal and state codes. The project is required to adhere to all applicable MDAQMD Rules and Regulations during construction and operations including but not limited to the following examples are some of the Rules that would apply to the project:

**Rule 201 Permit to Construct** A person shall not build, erect, install, alter, or replace any equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants without first obtaining written authorization for such construction from the Air Pollution Control Officer. A permit to construct shall remain in effect until the permit to operate the equipment for which the application was filed is granted or denied, or the application is canceled.

**Rule 203 Permit to Operate** A person shall not operate or use any equipment, the use of which may cause the issuance of air contaminants or the use of which may reduce or control the issuance of air contaminants, without first obtaining a written permit from the Air Pollution Control Office. The equipment shall not be operated contrary to the conditions specified in the permit to operate.

**Rule 204 Permit Conditions** To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any permit. Commencing work or operation under such a permit shall be deemed acceptance of all the conditions so specified.

**Rule 219 Equipment Not Requiring a Permit** The purpose of the rule is to describe equipment that does not require a permit pursuant to MDAQMD Rules 201 and 203; and describe equipment which does not need to be listed on a Federal Operating Permit pursuant to Regulation XII.

**Rule 401 Visible Emissions** The purpose of the Rule is to provide limits for the visible emissions from sources within the District.

**Rule 402 Nuisance** A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

**Rule 403 Fugitive Dust Control** The purpose of this rule is to reduce the amount of PM10 entrained in the ambient air from anthropogenic Fugitive Dust sources within the District by requiring actions to prevent, reduce, or mitigate Fugitive Dust.

**Rule 1113 Architectural Coatings.** The purpose of this rule is to limit the quantity of Volatile Organic Compounds (VOC) in Architectural Coatings

**Rule 1115 Metal Parts & Products Coating Operations.** The purpose of this rule is to limit the quantity of Volatile Organic Compounds (VOC) from the coatings of Metal Parts and Products.

**Rule 1300 New Source Review General.** Requirements for the preconstruction review of all new or modified Facilities to ensure the construction or modification of facilities subject to the regulation do not interfere with the attainment and maintenance of Ambient Air Quality Standards.

## 5.0 Best Management Practices

### CONSTRUCTION BMPs

The construction emissions as shown in Table 3.4-3 indicate that no MDAQMD Thresholds will be exceeded without mitigation. The Project will be required to comply with all applicable MDAQMD Rules (Section 2.9). Additionally, per MDAQMD past project reviews and in order to ensure emissions impacts from the construction phases will be reduced to the extent feasible the following Management Practices or Best Management Practices (BMP) are recommended:

**BMP-AQ-1 Dust Control Plan:** Prior to the issuance of a grading permit the developer is required to prepare and submit to the MDAQMD, prior to the commencing of earth-moving activity, a dust control plan that describes all applicable dust control measures that will be implemented at the Project Site.

**BMP-AQ-2 Dust Control:** Prior to the issuance of a grading permit and commencement of construction the following signage shall be erected and located within 50 feet of each project site entrance:

A minimum 48-inch high by 96-inch-wide sign, meeting the specified minimum text height, black text on white background, on 1-inch A/C laminated plywood board, with the lower edge between 6 and 7 feet above grade, with the contact's name of a responsible official for the site and a local or toll-free number that is accessible 24 hours per day. The sign shall contain the following information:

Site name *(4-inch text)*

Project Name/Project Number *(4-inch text)*

IF YOU SEE DUST COMING FROM                      *(4-inch text)*

THIS PROJECT CALL: *(4-inch text)*

[Contact Name], PHONE NUMBER: XXX-XXX-XXXX *(6-inch text)*

If you do not receive a response, Please Call *(3-inch text)*

The MDAQMD at 1-800-635-4617 *(3-inch text)*

**BMP-AQ-3 Maintain Moist Disturbed Surfaces:** During all phases of construction a water truck shall be used to maintain moist disturbed surfaces and actively spread water during visible dusting episodes to minimize fugitive dust emissions. For projects with exposed sand or fine deposits (and for projects that expose such soils through earthmoving), chemical stabilization or covering with a stabilizing layer of gravel will be required to eliminate visible dust/sand from sand/fines deposits.

**BMP-AQ-4 Wind Fencing:** All perimeter fencing shall be wind fencing or the equivalent, to a minimum of four feet of height or the top of all perimeter fencing. The owner/operator shall maintain the wind fencing as needed to keep it intact and remove windblown dropout. This wind fencing requirement may be superseded by local ordinance, rule, or project-specific biological mitigation prohibiting wind fencing.

**BMP-AQ-5 Track out Prevention:** All maintenance and access vehicular roads and parking areas shall be stabilized with chemical, gravel, or asphaltic pavement sufficient to eliminate visible fugitive dust from vehicular travel and wind erosion. Actions shall be taken to prevent project-related track out onto paved surfaces and clean any project-related track out within 24 hours. All earthen surfaces within the project area shall be stabilized by natural or irrigated vegetation, compaction, chemical, or other means sufficient to prohibit visible fugitive dust from wind erosion.

#### **OPERATIONAL BMPs**

The operational emissions as shown in Table 3.5 indicate that MDAQMD Thresholds will not be exceeded. The Project will be required to comply with all applicable MDAQMD Rules, and the project must also adhere to the City of Adelanto General Plan Policies and Implementing Programs. Additionally, to ensure emissions impacts from the operational phases will be reduced to the extent feasible the following Best Management Practices (BMPs) are recommended:

**BMP-AQ-6 Truck Access Gate Signage:** All truck access gates and loading docks within the project site shall have a sign posted those states:

- Truck drivers shall turn off engines when not in use.
- Truck drivers shall shut down the engine after five minutes of continuous idling operation once the vehicle is stopped, the transmission is set to “neutral” or “park”, and the parking brake is engaged.
- Telephone numbers of the building facilities manager and CARB to report Violations.

#### **5.0 Conclusion**

Based on the assessment in Section 3.0 all estimated Project emissions for construction and operations based on the Updated Project are below the MDAQMD significance threshold levels and as such impacts to the environment for Air Quality are less than significant. Additionally, the proposed Project will not conflict with any air quality policies or plans.

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# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Cassia and Daisy - Adelanto
Construction Start Date	11/14/2023
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.80
Precipitation (days)	1.40
Location	34.54841247596987, -117.42923507477423
County	San Bernardino-Mojave Desert
City	Adelanto
Air District	Mojave Desert AQMD
Air Basin	Mojave Desert
TAZ	5104
EDFZ	10
Electric Utility	Southern California Edison
Gas Utility	Southwest Gas Corp.
App Version	2022.1.1.16

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
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Industrial Park	120	1000sqft	2.75	120,000	1,200	—	—	—
Parking Lot	130	Space	1.17	0.00	130	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.78	1.52	12.2	18.0	0.03	0.51	0.83	1.33	0.47	0.20	0.67	—	3,787	3,787	0.13	0.13	4.66	3,833
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4.80	31.9	39.9	36.6	0.05	1.81	7.89	9.70	1.66	3.99	5.65	—	5,531	5,531	0.23	0.13	0.12	5,552
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.17	1.99	8.12	11.2	0.02	0.34	0.54	0.88	0.31	0.13	0.44	—	2,439	2,439	0.09	0.08	1.30	2,467
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.21	0.36	1.48	2.05	< 0.005	0.06	0.10	0.16	0.06	0.02	0.08	—	404	404	0.01	0.01	0.22	408
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	548	137	—	—	82.0	—	—	65.0	—	—	—	—	—	—	548,000

Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	548	137	—	—	82.0	—	—	65.0	—	—	—	—	—	—	548,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	25.0	25.0	100	25.0	—	—	15.0	—	—	12.0	—	—	—	—	—	—	100,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No

## 2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.78	1.52	12.2	18.0	0.03	0.51	0.83	1.33	0.47	0.20	0.67	—	3,787	3,787	0.13	0.13	4.66	3,833
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	4.80	4.04	39.9	36.6	0.05	1.81	7.89	9.70	1.66	3.99	5.65	—	5,531	5,531	0.23	0.05	0.03	5,552
2024	2.34	31.9	18.3	19.7	0.03	0.84	2.96	3.80	0.77	1.38	2.15	—	3,701	3,701	0.13	0.13	0.12	3,743
2025	0.21	31.9	0.94	1.70	< 0.005	0.03	0.13	0.16	0.03	0.03	0.06	—	264	264	0.01	0.01	0.01	266
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.12	0.10	0.98	0.95	< 0.005	0.05	0.17	0.22	0.04	0.08	0.13	—	144	144	0.01	< 0.005	0.02	145
2024	1.17	1.99	8.12	11.2	0.02	0.34	0.54	0.88	0.31	0.13	0.44	—	2,439	2,439	0.09	0.08	1.30	2,467
2025	< 0.005	0.62	0.02	0.03	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.24	5.24	< 0.005	< 0.005	< 0.005	5.28

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2023	0.02	0.02	0.18	0.17	< 0.005	0.01	0.03	0.04	0.01	0.02	0.02	—	23.8	23.8	< 0.005	< 0.005	< 0.005	23.9
2024	0.21	0.36	1.48	2.05	< 0.005	0.06	0.10	0.16	0.06	0.02	0.08	—	404	404	0.01	0.01	0.22	408
2025	< 0.005	0.11	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.87	0.87	< 0.005	< 0.005	< 0.005	0.87

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.60	5.99	3.64	31.3	0.06	0.12	4.85	4.97	0.12	1.23	1.35	133	9,210	9,344	14.0	0.40	53.5	9,865
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.39	4.86	3.82	19.9	0.06	0.11	4.85	4.96	0.11	1.23	1.34	133	8,662	8,796	14.0	0.41	31.8	9,298
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.58	5.04	3.54	21.5	0.05	0.11	4.24	4.35	0.11	1.07	1.18	133	8,099	8,232	13.9	0.38	39.6	8,733
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.47	0.92	0.65	3.93	0.01	0.02	0.77	0.79	0.02	0.20	0.22	22.1	1,341	1,363	2.31	0.06	6.56	1,446
Exceeds (Daily Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	137	137	548	137	—	—	82.0	—	—	65.0	—	—	—	—	—	—	548,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Exceeds (Average Daily)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Threshold	—	137	137	548	137	—	—	82.0	—	—	65.0	—	—	—	—	—	—	548,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No
Exceeds (Annual)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Threshold	—	25.0	25.0	100	25.0	—	—	15.0	—	—	12.0	—	—	—	—	—	—	100,000
Unmit.	—	No	No	No	No	—	—	No	—	—	No	—	—	—	—	—	—	No

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.57	2.35	2.71	25.3	0.06	0.05	4.85	4.89	0.04	1.23	1.27	—	5,938	5,938	0.18	0.24	22.2	6,037
Area	0.93	3.58	0.04	5.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.5	21.5	< 0.005	< 0.005	—	21.5
Energy	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	3,098	3,098	0.29	0.03	—	3,113
Water	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Waste	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Total	3.60	5.99	3.64	31.3	0.06	0.12	4.85	4.97	0.12	1.23	1.35	133	9,210	9,344	14.0	0.40	53.5	9,865
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.29	2.08	2.93	19.1	0.05	0.05	4.85	4.89	0.04	1.23	1.27	—	5,411	5,411	0.19	0.25	0.58	5,491
Area	—	2.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	3,098	3,098	0.29	0.03	—	3,113
Water	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Waste	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Total	2.39	4.86	3.82	19.9	0.06	0.11	4.85	4.96	0.11	1.23	1.34	133	8,662	8,796	14.0	0.41	31.8	9,298
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.03	1.84	2.64	18.2	0.05	0.04	4.24	4.28	0.04	1.07	1.11	—	4,837	4,837	0.17	0.22	8.40	4,916
Area	0.46	3.15	0.02	2.57	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.6	10.6	< 0.005	< 0.005	—	10.6
Energy	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	3,098	3,098	0.29	0.03	—	3,113
Water	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Waste	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Total	2.58	5.04	3.54	21.5	0.05	0.11	4.24	4.35	0.11	1.07	1.18	133	8,099	8,232	13.9	0.38	39.6	8,733
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.37	0.34	0.48	3.32	0.01	0.01	0.77	0.78	0.01	0.20	0.20	—	801	801	0.03	0.04	1.39	814
Area	0.08	0.57	< 0.005	0.47	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.75	1.75	< 0.005	< 0.005	—	1.76
Energy	0.02	0.01	0.16	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	513	513	0.05	< 0.005	—	515
Water	—	—	—	—	—	—	—	—	—	—	—	8.80	25.3	34.1	0.91	0.02	—	63.2
Waste	—	—	—	—	—	—	—	—	—	—	—	13.3	0.00	13.3	1.33	0.00	—	46.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.17	5.17
Total	0.47	0.92	0.65	3.93	0.01	0.02	0.77	0.79	0.02	0.20	0.22	22.1	1,341	1,363	2.31	0.06	6.56	1,446

### 3. Construction Emissions Details

#### 3.1. Site Preparation (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	4.70	3.95	39.7	35.5	0.05	1.81	—	1.81	1.66	—	1.66	—	5,295	5,295	0.21	0.04	—	5,314
Dust From Material Movement	—	—	—	—	—	—	7.67	7.67	—	3.94	3.94	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.54	0.49	< 0.005	0.02	—	0.02	0.02	—	0.02	—	72.5	72.5	< 0.005	< 0.005	—	72.8
Dust From Material Movement	—	—	—	—	—	—	0.11	0.11	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.10	0.09	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12.0	12.0	< 0.005	< 0.005	—	12.1
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.12	1.15	0.00	0.00	0.23	0.23	0.00	0.05	0.05	—	235	235	0.01	0.01	0.03	—
Vendor	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	—
Hauling	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	3.32	3.32	< 0.005	< 0.005	0.01	—
Vendor	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	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.55	0.55	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—

### 3.3. Grading (2023) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.43	2.04	20.0	19.7	0.03	0.94	—	0.94	0.87	—	0.87	—	2,958	2,958	0.12	0.02	—	2,968

Dust From Material Movement:	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.04	0.43	0.42	< 0.005	0.02	—	0.02	0.02	—	0.02	—	63.7	63.7	< 0.005	< 0.005	—	63.9
Dust From Material Movement:	—	—	—	—	—	—	0.06	0.06	—	0.03	0.03	—	—	—	—	—	—	—
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.08	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	10.5	10.5	< 0.005	< 0.005	—	10.6
Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.08	0.10	0.99	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	202	202	0.01	0.01	0.02	—
Vendor	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	—
Hauling	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	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.47	4.47	< 0.005	< 0.005	0.01	—
Vendor	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	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.74	0.74	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—

### 3.5. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.26	1.90	18.2	18.8	0.03	0.84	—	0.84	0.77	—	0.77	—	2,958	2,958	0.12	0.02	—	2,969
Dust From Material Movement	—	—	—	—	—	—	2.76	2.76	—	1.34	1.34	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.79	5.79	< 0.005	< 0.005	—	5.81

Dust From Material Movement:	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.96	0.96	< 0.005	< 0.005	—	0.96
Dust From Material Movement:	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.08	0.09	0.91	0.00	0.00	0.20	0.20	0.00	0.05	0.05	—	198	198	0.01	0.01	0.02	—
Vendor	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	—
Hauling	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.40	0.40	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	—
Vendor	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	—

Hauling	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	—
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### 3.7. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	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	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.44	1.20	11.2	13.1	0.02	0.50	—	0.50	0.46	—	0.46	—	2,398	2,398	0.10	0.02	—	2,406
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	7.07	8.26	0.01	0.31	—	0.31	0.29	—	0.29	—	1,511	1,511	0.06	0.01	—	1,516
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	1.29	1.51	< 0.005	0.06	—	0.06	0.05	—	0.05	—	250	250	0.01	< 0.005	—	251
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.31	0.29	0.27	4.55	0.00	0.00	0.66	0.66	0.00	0.15	0.15	—	751	751	0.03	0.03	2.94	—
Vendor	0.03	0.02	0.66	0.30	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	638	638	< 0.005	0.08	1.72	—
Hauling	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	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.28	0.26	0.31	3.05	0.00	0.00	0.66	0.66	0.00	0.15	0.15	—	664	664	0.03	0.03	0.08	—
Vendor	0.03	0.02	0.70	0.30	< 0.005	0.01	0.17	0.18	0.01	0.05	0.06	—	639	639	< 0.005	0.08	0.04	—
Hauling	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.18	0.16	0.20	2.16	0.00	0.00	0.41	0.41	0.00	0.10	0.10	—	431	431	0.02	0.02	0.80	—
Vendor	0.02	0.01	0.44	0.19	< 0.005	0.01	0.11	0.11	0.01	0.03	0.03	—	402	402	< 0.005	0.05	0.47	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.04	0.39	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	71.4	71.4	< 0.005	< 0.005	0.13	—
Vendor	< 0.005	< 0.005	0.08	0.03	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	66.6	66.6	< 0.005	0.01	0.08	—
Hauling	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	—

### 3.9. Paving (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.91	0.76	6.87	8.89	0.01	0.33	—	0.33	0.30	—	0.30	—	1,351	1,351	0.05	0.01	—	1,355
Paving	—	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.04	0.34	0.44	< 0.005	0.02	—	0.02	0.01	—	0.01	—	66.6	66.6	< 0.005	< 0.005	—	66.8
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.0	11.0	< 0.005	< 0.005	—	11.1
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.11	0.10	0.12	1.21	0.00	0.00	0.26	0.26	0.00	0.06	0.06	—	264	264	0.01	0.01	0.03	—
Vendor	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	—
Hauling	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.07	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.4	13.4	< 0.005	< 0.005	0.02	—
Vendor	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	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.22	2.22	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—

### 3.11. Architectural Coating (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.17	0.14	0.91	1.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architect ural Coatings	—	31.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.18	4.18	< 0.005	< 0.005	—	4.20
Architect ural Coatings	—	0.99	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.69	0.69	< 0.005	< 0.005	—	0.69	
Architectural Coatings	—	0.18	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Onsite truck	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	—	
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	0.06	0.05	0.06	0.61	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	133	133	0.01	0.01	0.02	—	
Vendor	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	—	
Hauling	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	—	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.28	4.28	< 0.005	< 0.005	0.01	—	
Vendor	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	—	
Hauling	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	—	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.71	0.71	< 0.005	< 0.005	< 0.005	—	
Vendor	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	—	
Hauling	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	—	

3.13. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	31.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.61	2.61	< 0.005	< 0.005	—	2.62
Architectural Coatings	—	0.62	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.43	0.43	< 0.005	< 0.005	—	0.43
Architectural Coatings	—	0.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	—
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05	0.05	0.05	0.56	0.00	0.00	0.13	0.13	0.00	0.03	0.03	—	130	130	0.01	0.01	0.01	—
Vendor	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	—
Hauling	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	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.62	2.62	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.43	0.43	< 0.005	< 0.005	< 0.005	—
Vendor	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	—
Hauling	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	—

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Industrial Park	2.57	2.35	2.71	25.3	0.06	0.05	4.85	4.89	0.04	1.23	1.27	—	5,938	5,938	0.18	0.24	22.2	6,037
Parking Lot	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
Total	2.57	2.35	2.71	25.3	0.06	0.05	4.85	4.89	0.04	1.23	1.27	—	5,938	5,938	0.18	0.24	22.2	6,037
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	2.29	2.08	2.93	19.1	0.05	0.05	4.85	4.89	0.04	1.23	1.27	—	5,411	5,411	0.19	0.25	0.58	5,491
Parking Lot	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
Total	2.29	2.08	2.93	19.1	0.05	0.05	4.85	4.89	0.04	1.23	1.27	—	5,411	5,411	0.19	0.25	0.58	5,491
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	0.37	0.34	0.48	3.32	0.01	0.01	0.77	0.78	0.01	0.20	0.20	—	801	801	0.03	0.04	1.39	814
Parking Lot	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
Total	0.37	0.34	0.48	3.32	0.01	0.01	0.77	0.78	0.01	0.20	0.20	—	801	801	0.03	0.04	1.39	814

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	2,000	2,000	0.19	0.02	—	2,012

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.6	42.6	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,043	2,043	0.19	0.02	—	2,055
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	2,000	2,000	0.19	0.02	—	2,012
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	42.6	42.6	< 0.005	< 0.005	—	42.9
Total	—	—	—	—	—	—	—	—	—	—	—	—	2,043	2,043	0.19	0.02	—	2,055
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	331	331	0.03	< 0.005	—	333
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	7.06	7.06	< 0.005	< 0.005	—	7.10
Total	—	—	—	—	—	—	—	—	—	—	—	—	338	338	0.03	< 0.005	—	340

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	1,055	1,055	0.09	< 0.005	—	1,058
Parking Lot	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
Total	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	1,055	1,055	0.09	< 0.005	—	1,058

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	1,055	1,055	0.09	< 0.005	—	1,058
Parking Lot	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
Total	0.10	0.05	0.88	0.74	0.01	0.07	—	0.07	0.07	—	0.07	—	1,055	1,055	0.09	< 0.005	—	1,058
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	0.02	0.01	0.16	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	175	175	0.02	< 0.005	—	175
Parking Lot	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
Total	0.02	0.01	0.16	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	175	175	0.02	< 0.005	—	175

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	2.57	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.93	0.86	0.04	5.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.5	21.5	< 0.005	< 0.005	—	21.5

Total	0.93	3.58	0.04	5.22	< 0.005	0.01	—	0.01	0.01	—	0.01	—	21.5	21.5	< 0.005	< 0.005	—	21.5
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	2.57	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.16	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	2.73	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.47	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.08	0.08	< 0.005	0.47	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.75	1.75	< 0.005	< 0.005	—	1.76
Total	0.08	0.57	< 0.005	0.47	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.75	1.75	< 0.005	< 0.005	—	1.76

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Industrial Park	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	53.2	153	206	5.47	0.13	—	382
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	8.80	25.3	34.1	0.91	0.02	—	63.2
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	8.80	25.3	34.1	0.91	0.02	—	63.2

## 4.5. Waste Emissions by Land Use

### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	80.2	0.00	80.2	8.02	0.00	—	281
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	13.3	0.00	13.3	1.33	0.00	—	46.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	13.3	0.00	13.3	1.33	0.00	—	46.5

#### 4.6. Refrigerant Emissions by Land Use

##### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	31.2	31.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.17	5.17
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	5.17	5.17

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.9. User Defined Emissions By Equipment Type

#### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	12/13/2023	12/20/2023	5.00	5.00	—
Grading	Grading	12/21/2023	1/1/2024	5.00	8.00	—
Building Construction	Building Construction	1/2/2024	11/19/2024	5.00	230	—
Paving	Paving	11/20/2024	12/15/2024	5.00	18.0	—
Architectural Coating	Architectural Coating	12/16/2024	1/10/2025	5.00	18.0	—

### 5.2. Off-Road Equipment

#### 5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	1.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	3.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Cement and Mortar Mixers	Diesel	Average	2.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	6.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	6.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

## 5.3. Construction Vehicles

### 5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	18.5	LDA,LDT1,LDT2
Site Preparation	Vendor	—	10.2	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT

Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	15.0	18.5	LDA,LDT1,LDT2
Grading	Vendor	—	10.2	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	50.4	18.5	LDA,LDT1,LDT2
Building Construction	Vendor	19.7	10.2	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	20.0	18.5	LDA,LDT1,LDT2
Paving	Vendor	—	10.2	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	10.1	18.5	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	10.2	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

## 5.4. Vehicles

### 5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

## 5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	180,000	60,000	3,058

## 5.6. Dust Mitigation

### 5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	7.50	0.00	—
Grading	—	—	8.00	0.00	—
Paving	0.00	0.00	0.00	0.00	1.17

### 5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

## 5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Industrial Park	0.00	0%
Parking Lot	1.17	100%

## 5.8. Construction Electricity Consumption and Emissions Factors

### kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2023	0.00	532	0.03	< 0.005
2024	0.00	532	0.03	< 0.005

2025	0.00	532	0.03	< 0.005
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## 5.9. Operational Mobile Sources

### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VM/Weekday	VM/Saturday	VM/Sunday	VM/Year
Industrial Park	404	305	149	129,085	6,869	5,177	2,528	2,192,680
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	180,000	60,000	3,058

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

## Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Industrial Park	2,094,226	349	0.0330	0.0040	3,292,802
Parking Lot	44,646	349	0.0330	0.0040	0.00

## 5.12. Operational Water and Wastewater Consumption

## 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Industrial Park	27,750,000	26,566
Parking Lot	0.00	2,878

## 5.13. Operational Waste Generation

## 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Industrial Park	149	—
Parking Lot	0.00	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

## 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Industrial Park	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
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## 8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	No demolitions phase