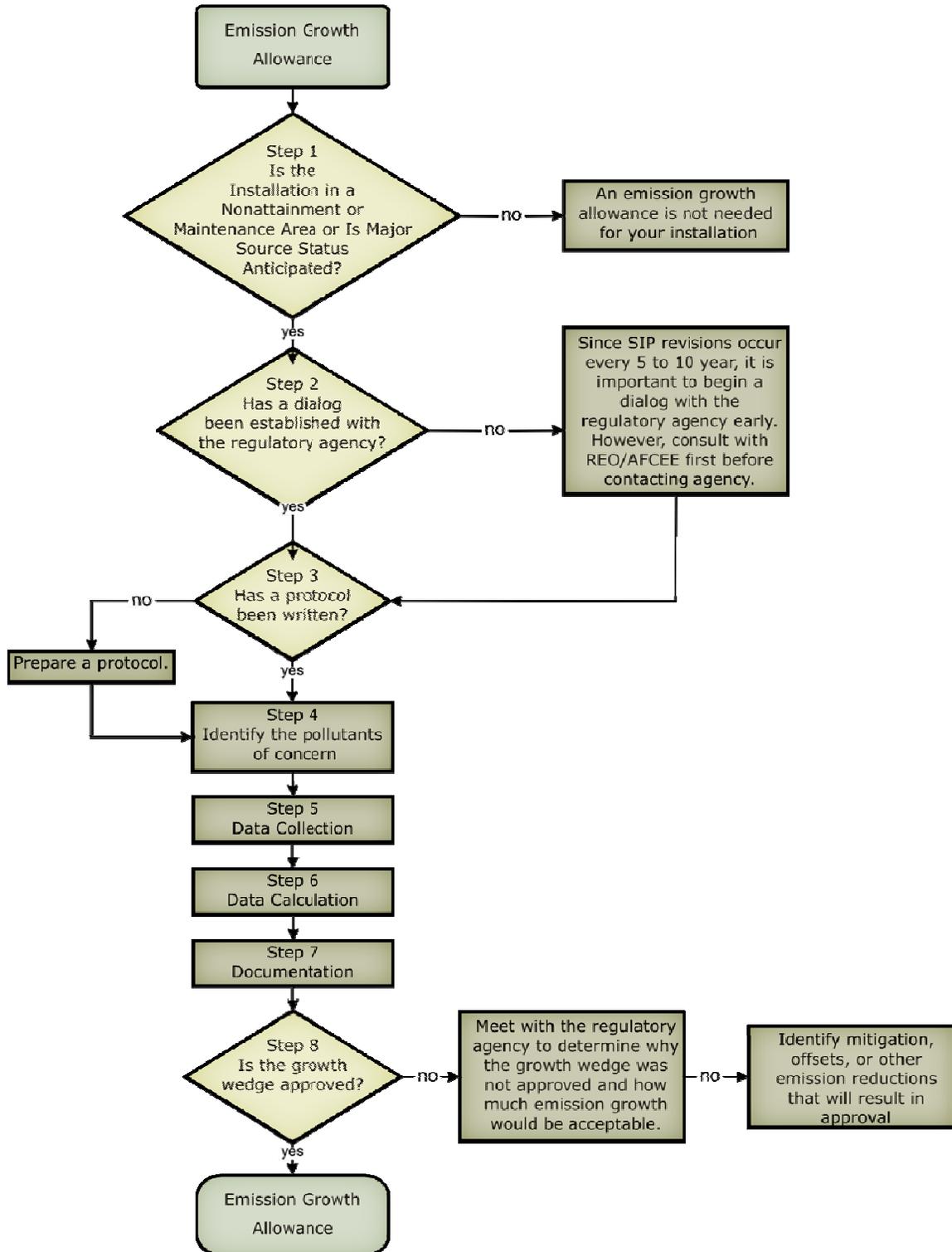


Military Emissions Growth Allowance



Military Emissions Growth Allowance

Step 1-Determine the need for a military emissions growth allowance.

General conformity regulations (40 CFR Part 51 Subpart W and Part 93) require federal agencies located in nonattainment or maintenance areas to demonstrate conformity with local SIP requirements prior to commencing actions affecting non-permitted emission units, which create new violations of NAAQS; increase the frequency or severity of existing violations; or delay attainment. If emissions exceed *de minimis* level, a detailed conformity analysis is required. Actions that can trigger conformity analysis include BRAC, training missions, new weapons systems, and NEPA.

To mitigate the cost and time associated with a conformity analysis, installations located in a nonattainment or maintenance for any criteria pollutant or anticipate changes to the installations mission, operation, or emissions that could exceed the major source thresholds can work with the local regulator agency to include anticipated emission increases in the SIP budget. This action is referred to as the **Military Emissions Growth Allowance**.

Installations that do not meet the above criteria do not need an emissions growth allowance, unless attainment status of the area changes or major changes are anticipated for the area.

Step 2- Communication and Coordination

Before pursuing the military growth allowance in the SIP budget, it is important that a dialog is established with installation management (i.e. immediate supervisor, environmental department director, base commander) and the local regulatory agency. It would be important to start the communications with the REO/AFCEE points of contact first before discussing with the agency. It is important to describe the purpose and benefits of the growth allowance.

Step 3-Protocol Development

The protocol must document the purpose, expected outcome, and methodology used to determine the growth and be provided to the agency for review and approval. The document should include:

- Description of emission sources covered in the baseline and growth calculations
- Pollutants of concerns
- Description of the emission calculations methodology used and proposed emission factors
- Description of the major assumptions
- Description of the level of detail that will be provided for the potential growth scenarios
- Description of how the military growth amount or percentage and baseline will be calculated

It is important to note that this document will become public document.

Step 4-Identify Pollutants of Concern

Identify the pollutant(s) that the area the installation is located in is in nonattainment or maintenance. This will help determine what type of data needs to be collected.

Step 5-Data Collection

Consult the regulatory agency as to which year should be used as the baseline. Most likely the agency will choose the same year they will be using for the SIP update. Determine if there is existing data for the chosen baseline year and update the information as necessary. The types of emission units that are included in the data collection depends on the pollutant for which the SIP is being revised. Emissions units

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include mobile sources. Emission units and operations that are permitted through stationary source permitting programs are not included in this effort.

The collected data should include: equipment inventory, equipment type, capacity, make and mode, fuel type, and operational data. Information may be obtained using existing documentation such as emission inventories, planning documents and NEPA documentation.

Step 6-Data Calculation

Use established methodologies and emission factors, where available, to calculate emissions. Assumptions used to calculate growth emissions should be well documented so that it is clear to the regulatory agency.

It is important to note that some details on weapons systems design and placement may not be available. Also, due to NEPA requirements the placement of the weapons system cannot be represented as certain as that would be predecisional and illegal. NEPA documentation will be prepared as soon as potential actions become proposals as defined in Council on Environmental Quality regulations at 40 CFR 1508.23. In these instances, growth emissions will need to be calculated based on the best available data at the time of this analysis.

Step 7- Documentation

Growth wedges that are approved are incorporated into the SIP budget and sent to EPA for approval. Therefore, documentation should be defensible and include

- Methodology
- Explanation of Assumptions
- Calculation results
- Proposed emissions growth allowance for potential projections
- Proposed emissions growth wedge for unanticipated growth

Step 8-Negotiating an Additional Growth Wedge

A "growth wedge" is the additional emissions growth allowance negotiated with the agency to allow for anticipated changes to your mission or operations. The amount of growth wedge that the agency is willing to provide is dependent on how close the region is to achieving or maintaining attainment. This is a case-by-case decision negotiated between the installation and the agency. If the regulatory agency does not approve the growth wedge, meet with them to determine why the growth wedge was not approved and how much emission growth would be acceptable. In addition, it may be helpful to identify mitigation, offsets, or other emission reductions that will result in approval