
Appendix I – General Conformity Determination and TCEQ Conformity Concurrence Letter

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Emily Lindley, *Commissioner*
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 6, 2023

John MacFarlane
Environmental Protection Specialist, Southwest Region
Federal Aviation Administration, Planning and Programming Branch, ASW 610
10101 Hillwood Parkway, Fort Worth, TX 76177

VIA EMAIL

Subject: General Conformity Concurrence for the Central Terminal Area Expansion Project

Dear John MacFarlane:

The Texas Commission on Environmental Quality (TCEQ) completed its review of the Draft General Conformity Determination for the Central Terminal Area Expansion Project received October 23, 2023, with final revisions received November 30, 2023. The draft determination was prepared by the Dallas Fort Worth International Airport (DFWIA) for the Federal Aviation Administration. The TCEQ reviewed the action in accordance with the general conformity requirements established in Title 40 Code of Federal Regulations (CFR) Part 93, Subpart B and concurs that the project conforms to the Texas State Implementation Plan (SIP).

The proposed action is located in the Dallas-Fort Worth ozone nonattainment area, which is currently classified by the United States Environmental Protection Agency as severe for the 2008 eight-hour ozone standard and moderate for the 2015 eight-hour ozone standard. The general conformity demonstration for this action relies on 40 CFR §93.158(a)(5)(i)(a), and the applicable SIP revision is the Dallas-Fort Worth portion of the *Dallas-Fort Worth and Houston-Galveston-Brazoria Serious Classification Reasonable Further Progress State Implementation Plan Revision for the 2008 Eight-Hour Ozone National Ambient Air Quality Standard* (DFW 2008 Ozone NAAQS Serious RFP SIP Revision), adopted March 4, 2020 and approved by the EPA effective May 24, 2023 (88 FR 24693).

The DFWIA presented data showing that the proposed action would result in nitrogen oxides emissions exceeding the 25 tons per year *de minimis* threshold for general conformity starting in 2025 and extending into the reasonably foreseeable future and volatile organic compounds emissions exceeding *de minimis* starting in 2031 and extending into the reasonably foreseeable future. Based on comparing the emissions estimated for this action with source category allocations from the quantification of overall excess creditable RFP emissions reductions in the applicable SIP revision that would be available after meeting the 2020 RFP emissions reduction target, establishing a motor vehicle emissions budget safety margin for transportation conformity (40 CFR §93.101), and accounting for previously proposed federal actions that relied on the current applicable SIP revision to demonstrate conformity, TCEQ concurs with the determination.¹

¹ On October 2, 2023, TCEQ provided concurrence on the Federal Aviation Administration action to approve the general conformity determination for DFWIA's 19th Street Cargo Redevelopment Project, which also relied on 40 CFR §93.158(a)(5)(i)(a) to demonstrate conformity with the DFW 2008 Ozone NAAQS Serious RFP SIP Revision.

John MacFarlane
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December 6, 2023

If you require further assistance on this matter, please contact Jamie Zech of the Air Quality Division at 512-239-3935 or jamie.zech@tceq.texas.gov.

Sincerely,

Donna F. Huff  Digitally signed by Donna F. Huff
Date: 2023.12.06 14:27:37 -06'00'

Donna F. Huff, Deputy Director
Air Quality Division

cc: Guy Donaldson, United States Environmental Protection Agency, Region 6

FINAL GENERAL CONFORMITY DETERMINATION: CENTRAL TERMINAL AREA EXPANSION

Project no. **1690015627-019**
 Recipient **Sandra Lancaster, Dallas Fort Worth International Airport
 U.S. Department of Transportation
 Federal Aviation Administration**
 Date **March 2024**
 Prepared by **Gwen Pelletier, Ramboll**
 Checked by **Krish Vijayaraghavan, Ramboll**
 Approved by **Megan Neiderhiser, Ramboll**

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Acronyms and Abbreviations

ACEIT	Airport Construction Emissions Inventory Tool
ACRP	Airport Cooperative Research Program
AEDT	Aviation Environmental Design Tool
AOA	Airfield Operations Area
AP-42	Compilation of Air Pollutant Emissions Factors
APM	Automated People Mover
APU	Auxiliary Power Unit
ASPM	Aviation System Performance Metrics
CAA	Federal Clean Air Act
CFR	Code of Federal Regulations
CTA	Central Terminal Area
CO	Carbon Monoxide
CY	Calendar Year
DCE	Diesel Construction Equipment
DFW	Dallas Fort Worth International Airport
EA	Environmental Assessment
EAD	Environmental Affairs Department
eCUP	Electric Central Utility Plant
EIS	Environmental Impact Statement
EPA	United States Environmental Protection Agency
FAA	Federal Aviation Administration
FAA Handbook	FAA Aviation Emissions and Air Quality Handbook
FR	Federal Register
FY	Fiscal Year
GCD	General Conformity Determination
GSE	Ground Support Equipment
LFA	Lead Federal Agency
LTO	Landing and Takeoff Operation
MOVES3	MOtor Vehicle Emission Simulator Version 3
NAA	Nonattainment Area
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO ₂	Nitrogen Dioxide

NO _x	Nitrogen Oxides
NSR	New Source Review
µg/m ³	Micrograms per Cubic Meter
Pb	Lead
PM ₁₀	Particulate Matter Less Than 10 Microns in Diameter
PM _{2.5}	Particulate Matter Less Than 2.5 Microns
ppb	Parts per Billion
ppm	Parts per Million
RACM	Reasonably Available Control Measures
RACT	Reasonably Available Control Technologies
RFP	Reasonable Further Progress
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
TAF	Terminal Area Forecast
TexN	Texas NONROAD
TCEQ	Texas Commission on Environmental Quality
TIP	Transportation Improvement Program
tpd	Short Tons per Day
tpy	Short Tons per Year
TRB	Transportation Research Board
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound

Executive Summary

Pursuant to the requirements of the National Environmental Policy Act (NEPA), the Federal Aviation Administration (FAA) has prepared a Final Environmental Assessment (EA) to assess the Central Terminal Area (CTA) Expansion (the “Proposed Action”) at Dallas Fort Worth International Airport (DFW).

The Proposed Action is located in the Dallas Fort Worth Air Quality Control Region (AQCR 215) non-attainment area (NAA) for the ozone (O₃) national ambient air quality standard (NAAQS). The Proposed Action would develop and renovate terminals, build a new Terminal F, upgrade the existing Terminal C, improve the passenger experience with improved flows, additional concession areas, and new boarding facilities, and extend the life of the facility.

Section 176(c) of the Clean Air Act (CAA), known as the General Conformity Rule Rules [42 U.S. Code [USC] 7506(c)], requires federal actions in nonattainment areas conform to the purpose of the applicable State Implementation Plan (SIP). Federal actions that are not covered under Transportation Conformity are evaluated under General Conformity. The General Conformity Rules are not applicable to certain federal actions, such as those that would result in no emissions increase or an increase that is clearly *de minimis*, actions where the emissions are not reasonably foreseeable, and actions that implement a decision to conduct or carry out a conforming program. In addition, General Conformity determinations are not required for portions of actions that include major new or modified stationary sources that require a permit under the New Source Review program. The General Conformity Rules are applicable to the DFW CTA Expansion project. As this document shows, the project-related emissions would exceed the General Conformity Rule *de minimis* thresholds for O₃ precursors, nitrogen oxides (NO_x) and volatile organic compounds (VOC), thus a General Conformity Determination has been prepared for this Proposed Action.

This final General Conformity Determination documents the methods by which General Conformity was evaluated for the DFW CTA Expansion project, in accordance with the Federally approved State Implementation Plan (SIP). The most recent Federally approved SIP developed by the representative status agency, the Texas Commission on Environmental Quality (TCEQ), is the *Dallas-Fort Worth and Houston-Galveston-Brazoria Serious Classification Reasonable Further Progress (RFP) State Implementation Plan Revision for the 2008 Eight-Hour Ozone National Ambient Air Quality Standard* (Project No. 2019-079-SIP-NR; 04 March 2020), approved by USEPA on 24 April 2023 with the effective date of 24 May 2023. As demonstrated below, the emissions from the Proposed Action can be accounted for in the applicable Texas SIP Revision and thus, meet General Conformity requirements.

The general methodology for developing the emission inventories and conducting the general conformity applicability analysis were documented in the *General Conformity Protocol for the DFW Airport Central Terminal Area Expansion Project*, included in **Appendix A**. The Proposed Action direct¹ and indirect² project-related emissions are presented below, and described in more details in **Appendix B**.

¹ Direct emissions are those that occur at the same time and place as the federal action as stated in 40 CFR 193.162.

² Indirect emissions are defined as emissions or precursors that are caused or initiated by the federal action and originate in the same nonattainment or maintenance area but occur at a different time or place from the action, are reasonably foreseeable, that the agency can practically control, and for which the agency has continuing program responsibility.

Table ES-1 compares the total direct and indirect project-related emissions to the applicable *de minimis* thresholds under the current severe designation for the Dallas-Fort Worth Ozone Nonattainment Area. In accordance with the General Conformity Rule, a *de minimis* level has been established for each nonattainment and maintenance designation for the ozone precursors NO_x and VOC. The annual estimated emissions from the Proposed Action exceed *de minimis* thresholds of 25 tons per year (tpy) for NO_x in years 2025 through 2036 and exceed 25 tpy VOCs in 2031 through 2036.

A General Conformity Determination is required when emissions are above the *de minimis* thresholds. Conformity under the General Conformity Rules can be demonstrated by the following approaches:

- 1) Conformity Approach A: A written determination from the state/local air quality agency stating that the emissions from the proposed action, together with all other emissions in the nonattainment or maintenance area would not exceed the emissions budget in the SIP.
- 2) Conformity Approach B: A written commitment from the Governor, or the Governor's designed for SIP actions, to include the emissions in a revised SIP (this automatically results in a call for a SIP revision).
- 3) Conformity Approach C: Offsetting or mitigating proposed action emissions so there is no net increase within the nonattainment or maintenance area.
- 4) Conformity Approach D: The applicable Metropolitan Planning Organization (MPO) determines that the emissions from the project or portion of the project, are included in a conforming transportation plan and transportation improvement program.

Table ES-1. Proposed Action Total Direct and Indirect Project-Related Emissions Compared to General Conformity *De Minimis* Thresholds

Project Year	Total Direct and Indirect Project-Related Emissions (tons/yr)		General Conformity <i>De Minimis</i> Threshold (tons/yr)		Do Project-Related Emissions Exceed the General Conformity <i>De Minimis</i> Threshold?	
	NO _x	VOC	NO _x	VOC	NO _x	VOC
Severe Ozone Classification						
2024	23.6	4.1	25	25	No	No
2025	35.8	8.8	25	25	Yes	No
2026	73.1	7.3	25	25	Yes	No
2027	135.6	11.8	25	25	Yes	No
2028-2030	211.8	18.6	25	25	Yes	No
2031-2035	447.2	39.8	25	25	Yes	Yes
2036	942.8	80.9	25	25	Yes	Yes

Source: 40 Code of Federal Regulations (CFR) 93.153(b) *de minimis* thresholds applied to Dallas-Fort Worth Nonattainment Area under the current "Severe" classification. Project-related emissions estimated by the Ramboll team (2023).

DFW Airport staff met with TCEQ to review the Proposed Action and its expected emissions. During those coordination meetings, TCEQ noted the attainment year emissions inventories approved in the SIP (Dallas-Fort Worth and Houston-Galveston-Brazoria Serious Classification RFP SIP Revision for the 2008 Eight-Hour Ozone National Ambient Air Quality Standard [Project No. 2019-079-SIP-NR;

04 March 2020]) as well as the quantification of overall excess creditable RFP emissions reductions available after meeting the milestone-year emissions reduction targets for NO_x and VOC and establishing motor vehicle emissions budgets (MVEB) for transportation conformity (40 CFR §93.101). To assess conformity to the SIP for the Proposed Action, TCEQ allocated the overall excess creditable RFP emissions reductions quantified in the applicable SIP according to source categories based on the RFP emissions reductions attributed to each source category. TCEQ compared emissions for the Proposed Action to those allocations. TCEQ confirmed that the maximum amount non-road source category emissions could increase due to projects not included in the approved SIP without changing the result of the RFP demonstration are 4.43 tons per day (tpd) NO_x and 4.77 tpd VOC; for on-road source category emissions, those amounts are 26.26 tpd NO_x and 12.55 tpd VOC³. Detailed discussions in **Section 5**, below.

Based upon the emissions noted in **Table ES-1**, project-related emissions for the Proposed Action⁴ translated from annual emissions into tons per day (tpd) are:

- 2025
 - On-Road Emissions: 0.040 tpd NO_x
 - Non-Road Emissions: 0.058 tpd NO_x
- 2026
 - On-Road Emissions: 0.029 tpd NO_x
 - Non-Road Emissions: 0.171 tpd NO_x
- 2027
 - On-Road Emissions: 0.010 tpd NO_x
 - Non-Road Emissions: 0.361 tpd NO_x
- 2028-2030
 - On-Road Emissions: 0.012 tpd NO_x
 - Non-Road Emissions: 0.568 tpd NO_x
- 2031-2035
 - On-Road Emissions: 0.026 tpd NO_x
 - Non-Road Emissions: 1.200 tpd NO_x
 - On-Road Emissions: 0.007 tpd VOC
 - Non-Road Emissions: 0.102 tpd VOC
- 2036
 - On-Road Emissions: 0.041 tpd NO_x
 - Non-Road Emissions: 2.542 tpd NO_x
 - On-Road Emissions: 0.012 tpd VOC
 - Non-Road Emissions: 0.210 tpd VOC

³ Note that while 4.97 tpd NO_x and 4.77 tpd VOC was available for nonroad and 26.26 tpd NO_x and 12.55 tpd VOC for on-road sources, DFW Airport has used a portion of the excess emissions for the 19th Street Cargo Project, which was approved in a General Conformity Determination by TCEQ on October 2, 2023. The 19th Street Cargo Project requires 0.542 tpd NO_x for nonroad sources and 0.004 tpd NO_x for on-road sources in 2025; and 0.536 tpd NO_x for nonroad sources in 2026 and beyond. The 19th Street Cargo Project does not exceed VOC emissions for any years.

⁴ Note that the Proposed Action's 2024 emissions are below the *de minimis* threshold

In a letter to FAA, dated, 06 December 2023, TCEQ issued a written determination stating that the emissions from the proposed action, together with all other emissions in the nonattainment or maintenance area would not exceed the emissions budget in the SIP, as is further noted in Section 5 of this document.

1. Introduction

Pursuant to the requirements of NEPA, the FAA, as the Federal agency, has overseen DFW Airport's preparation of the EA of potential environmental impacts associated with the Proposed Action at the DFW. The Proposed Action is located in the Dallas Fort Worth Air Quality Control Region (AQCR 215) nonattainment area for the O₃ NAAQS. Federal actions triggering NEPA review must be evaluated under federal Clean Air Act Conformity rules if located in a nonattainment or maintenance area. This General Conformity Determination documents the methods by which General Conformity will be evaluated for the upcoming DFW CTA Expansion project that exceeds the General Conformity Rule *de minimis* thresholds for O₃.

This General Conformity Determination has been prepared to discuss the potential environmental impacts associated with the expansion of the CTA. In conformance with NEPA, this analysis identifies and assesses the emissions that would result from the Proposed Action.

This analysis evaluates the potential air quality-related emissions of the Proposed Action, which would construct one (1) new terminal, two (2) new terminal piers, and a new station for the automated people mover (APM) Skylink network. In addition, the Proposed Action would include the following modifications to existing infrastructure: i) the expansion of passenger support facilities at one (1) terminal; ii) upgrades to passenger and baggage screening at one (1) terminal; iii) full renovation of one (1) terminal, and iv) additional requisite upgrades and modifications to aprons, parking garages, and utility underpinnings. This final General Conformity Determination and accompanying appendices describe the scope and methodology for evaluation of emissions from construction and operational sources, where relevant, and demonstrate how the conclusion concerning conformity was reached.

1.1. Project Background

For the CTA Expansion, a General Conformity applicability analysis was performed. The General Conformity applicability analysis included 1) development of a project-related emissions inventory and 2) evaluation of the project emission inventory magnitudes against General Conformity *de minimis* thresholds (40 CFR 93.153(b)). Per the General Conformity Rules, projects located in an ozone nonattainment or maintenance region evaluate the ozone precursor NO_x and VOCs. Project-related emissions of NO_x and VOC emissions that exceeded their respective *de minimis* thresholds require a General Conformity Determination. As an outcome of the applicability analysis for the Proposed Action, it was determined that a General Conformity Determination was needed for the CTA Expansion project.

The emissions inventory provides the total annual pollutant emissions as short tons per year and was prepared in accordance with the guidelines provided in FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*; FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*; and FAA's *Aviation Emissions and Air Quality Handbook Version 3 Update 1*.

Emissions inventories for the nonattainment precursor pollutants NO_x and VOC were developed for the project and, relative to CAA General Conformity, are documented in this General Conformity Determination. Appendix H of the EA documents the air quality analysis prepared under NEPA.

2. Conformity Rules and Criteria

Section 176(c) of the CAA (42 United States Code (USC) 7506(C)) requires any entity of the federal government that engages in, supports, or in any way provides financial support for, licenses or permits, or approves any activity, to demonstrate that the action conforms to the applicable SIP required under Section 110(a) of the CAA (42 USC 7410(a)). In this context, conformity means that such federal actions must be consistent with a SIP's purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of those standards. Each federal agency (including the FAA) must determine that any action that is proposed by the agency and that is subject to the regulations implementing the conformity requirements will conform to the applicable SIP before the action is taken. Specifically, a responsible federal agency is required to determine if the action "conforms" to the applicable SIP by ensuring that the action does not:

- Cause or contribute to any new violations of any NAAQS
- Increase the frequency or severity of any existing violations of any NAAQS
- Delay the timely attainment of any NAAQS or any required interim emission reductions or other milestones

Federal actions subject to conformity are divided into two categories: Transportation Conformity actions and General Conformity actions. The Transportation Conformity Regulations (40 CFR Part 51 and Part 93 Subpart A⁵) cover certain surface transportation actions related to highway and transit. General Conformity actions (40 CFR Part 93 Subpart B)⁶ are all other federal actions in nonattainment and maintenance areas that are not covered by Transportation Conformity Regulations

2.1 Transportation Conformity Requirements

As described in 40 CFR 51 and 93, issued by the U.S. Environmental Protection Agency (EPA), the Transportation Conformity Rule applies to highway or transit projects that receive Federal funding assistance and approval. The Transportation Conformity Rule does not apply to the Proposed Action because the Proposed Action does not involve federal funding or have a highway or transit component. All other Federal actions in nonattainment and maintenance areas not covered by Transportation Conformity Rule are required to be evaluated under the General Conformity Rule.

2.2 General Conformity Requirements

Federal actions that are not covered under Transportation Conformity are evaluated under General Conformity. General Conformity is a stepwise process that contains the following elements:

1. Determining if the project is exempt (40 CFR 93.153(c)(2)).
2. Determining if the project is presumed to conform (72 Federal Register (FR) 41565).
3. Completion of an applicability analysis that compares the total direct and indirect project-related emissions to the regulation's *de minimis* thresholds.

⁵ eCFR: 40 CFR Part 93 Subpart A -- Conformity to State or Federal Implementation Plans of Transportation Plans, Programs, and Projects Developed, Funded or Approved Under Title 23 U.S.C. or the Federal Transit Laws

⁶ eCFR: 40 CFR Part 93 Subpart B -- Determining Conformity of General Federal Actions to State or Federal Implementation Plans

4. Preparation of a general conformity determination for projects that exceed a *de minimis* threshold.

While the FAA has assembled a list of airport projects presumed to conform, the Proposed Action is neither exempt from General Conformity nor presumed to conform. FAA, as the lead federal agency for approval of the General Conformity Determination for the Proposed Action, coordinated with DFW to develop a General Conformity Determination Protocol for this project (**Appendix A**) to demonstrate the General Conformity Applicability Analysis and then the General Conformity Determination.

General Conformity applies to any criteria pollutants for which an area is categorized as nonattainment or maintenance. An applicability analysis under General Conformity consists of preparing an emissions inventory for all project-related direct and indirect emissions and comparing those results with the respective *de minimis* thresholds. The regulation defines the thresholds based on pollutant and attainment/nonattainment designation. The DFW Metropolitan Area Air Quality Control Region (AQCR 215) is designated as *severe* nonattainment for ozone. Total direct and indirect project-related emissions were compared to these *de minimis* thresholds. 40 CFR Part 93.159(d) notes that when comparing emissions to *de minimis* thresholds, the following requirements must be considered:

- a. Emissions in the year of attainment or the farthest year for which emissions are projected in the maintenance plan.
- b. The year in which the total of direct and indirect emissions from the action are expected to be the greatest on an annual basis.
- c. Any year for which the SIP has an applicable emissions budget. If total direct and indirect project-related emissions in all of these scenarios are less than *de minimis*, no further analysis is needed. If total direct and indirect project-related emissions are above *de minimis*, a General Conformity Determination is required.

If the peak year of project-related emissions are *de minimis* for the reasonably foreseeable horizon, then all three requirements listed above are also met. If emissions in any of these years are above *de minimis*, a General Conformity Determination is required.

As described in 40 CFR 51 and 93, issued by the EPA, the General Conformity analysis evaluates both direct emissions and indirect emissions, as defined by the 40 CFR § 93.152. “Direct emissions” are those that occur at the same time and place as the Federal action. As stated in 40 CFR § 93.152, “indirect emissions” are defined as emissions or precursors that are caused or initiated by the Federal action and originate in the same nonattainment or maintenance area but occur at a different time or place from the action, are reasonably foreseeable, that the agency can practically control, and for which the agency has continuing program responsibility. The focus of the General Conformity analysis is on these direct/indirect project-related emissions.

2.3 State Implementation Plan

Per the General Conformity Rule, the applicable SIP for general conformity purposes is: “the portion (or portions) of the SIP or most recent revision thereof, which has been approved under section 110(k) of the Act ... and which implements the relevant requirements of the Act.” Per TCEQ⁷, the SIP

⁷ TCEQ-DFW Coordination Meeting, July 25, 2023.

revision that currently qualifies as applicable for general conformity purposes in the Severe DFW O₃ nonattainment area for the 2008 O₃ NAAQS is the *Dallas-Fort Worth Serious Classification Reasonable Further Progress State Implementation Plan Revision for the 2008 Eight-Hour O₃ National Ambient Air Quality Standard*, adopted by the TCEQ on 4 March 2020, approved by the EPA on 24 April 2023, and effective 24 May 2023.

3. Description of Proposed Federal Action

This General Conformity Determination presents an overview of the technical approach (more details in the appendices) for the General Conformity analysis. This document will be reviewed by the DFW Airport, FAA, TCEQ, and any other stakeholders designated by the Airport. The air quality analysis approach for this Determination received consensus from the reviewing agencies on the technical methodologies.

3.1 Project Alternatives

Descriptions are included below for the No Action and Proposed Action alternatives evaluated for the EA.

3.1.1 No Action Alternative

The No Action Alternative represents a scenario where the Proposed Action is not constructed and where the project-related operational emission increases would not occur. DFW would not be able to meet the growing demand and growth in operations. The airport would continue to operate with obsolete, aging infrastructure and would be unable to meet changing customer expectations. Thus, no project-related construction emissions would occur, however, continued aircraft operations would be expected, but not at the level to meet anticipated passenger demand.

3.1.2 Proposed Action Alternative

DFW is proposing to construct the CTA Expansion Project to increase total passenger gates, rehabilitate, reconstruct, and modernize aging infrastructure, and provide enhanced connectivity between existing and new terminal facilities. The Proposed Action includes the construction of a Pier at Terminal A, with a net five new gates, a Pier at Terminal C with a net four new gates, a new Terminal F, located south of Terminal D, with up to 22 new gates, baggage and passenger processing improvements at Terminal E in support of Terminal F, a service corridor connecting Terminals E and F, a full renovation of Terminal C, as well as associated airside ramp and apron improvements, including supporting utility, fuel, and drainage infrastructure.

Overall, the proposed CTA Expansion Project would provide up to 31 new passenger gates at Terminals A, C, and F. The Proposed Action would also rehabilitate and modernize aging infrastructure within Terminal C. Furthermore, the Proposed Action would include the rehabilitation and reconstruction of the Terminal C parking garages and roadways; as well as the requisite modifications to the Skylink system and the construction of an automated people mover (APM) (aka Skylink) station to connect Terminals E and F.

- **Construction to increase the total passenger gates:** The project would add two piers, one at each Terminals A and C, that would increase the total number of gates at DFW. Ten gates would

be added to the new Terminal A Pier, which after gate reconfiguration, would result in a net increase of five gates. Nine gates would be added to the new Terminal C Pier, which after gate reconfiguration would result in a net increase of four gates. With the two new piers, there would be a net increase of nine gates. Development of Terminal F would add up to 22 gates, adding over 215,000 square feet of new concourse space. Traditionally, passenger and baggage processing would occur in terminal facilities; however, Terminal F baggage and passenger processing would occur within an expansion to Terminal E. The expansion of Terminal E involves the build-out of a vacant infill surface parking area within the current building footprint. Terminal F would be connected to the existing CTA via a new Skylink station.

- **Rehabilitation and reconstruction to improve and modernize aging infrastructure:** The Proposed Action would rehabilitate, renovate, and modernize Terminal C through the demolition of the concourse level, and reconstruction through modular and traditional construction methods. Modifications would be made within the existing terminal to improve the passenger experience, including additional screening lanes and security checkpoint reconfiguration to improve passenger flows, additional concession areas, new gate lounges, and boarding facilities. Ramp level and apron work would occur to relocate baggage claim to the lower level, to renovate building support and services rooms, and airline operations rooms, as well as accommodate some utility relocation, including drainage and fueling. The Proposed Action would also include structural repairs and American with Disability Act (ADA) code modernization in Terminal C Garages, Sections A and B, along with roadway rehabilitation and replacement and utility work. The Terminal C, Section C, which is at the end of its useful life would be demolished and reconstructed within its existing lateral footprint and would be expanded vertically to include an additional level, taking it from its existing five levels to six levels.
- **Connectivity Between Terminal E and Future Terminal F:** As mentioned previously, modifications to Terminal E are necessary for passenger and baggage processing for Terminal F. A new Baggage Handling System (BHS) building for outbound baggage handling would be constructed in the current in-fill surface parking lot in addition to Terminal E modifications to accommodate ticketing and passenger interactions. Terminals E and F, the BHS building, and a Terminal F Dock, which would provide for goods and services movements through an underground corridor. No changes to the Terminal E parking garage and roadway would be anticipated.
- **Ramp Area Improvements:** The Proposed Action would also include the expansion of Infield 6 to develop additional aircraft entry points (AEP), aircraft parking positions, hydrant fuel pits, (north of Skylink) and aircraft pavement areas to support aircraft operations, specifically for Terminal F. The airfield ramp area improvements include the rerouting and reconfiguration of the stormwater and spent aircraft deicing fluid (SADF) conveyance pipes, and demolition of the existing pavement, utilities, and other facilities within the footprint of the proposed expansion of Infield 6. Additionally, the project construction of requisite AOA fencing around the areas of the CTA that are associated with the Proposed Action.

Figure 3.1 shows the general Airport location and surroundings and **Figure 3.2** shows the Proposed Action project components and locations.

3.1.3 Connected Actions

Connected actions per 40 CFR 1508.25, are actions, “... *that are closely related and therefore should be discussed in the same impact statement. Actions are connected if they: (i) automatically trigger other actions which may require environmental impact statements, (ii) cannot or will not proceed unless other actions are taken previously or simultaneously, or (iii) are interdependent parts of a larger action and depend on the larger action for their justification.*” DFW has looked at other actions that occur simultaneously as supporting actions to the Proposed Action or would occur near the Proposed Action, either before or immediately after. These connected actions include.

- Project support locations (PSL) including proposed staging areas and pre-fabrication yards for modular building components for Proposed Action element construction.
- Utility infrastructure developments, including the Utility and Baggage Transfer Tunnel supporting Terminals E and F, and utility mains for Terminal F,
- Demolition of the Terminal E In-Fill Surface Parking lot and regrading for new Terminal E support facilities which are included within the Proposed Action,
- Demolition of the South Express Parking lot (east of existing Skylink facilities) and then site stabilization for future development opportunities,

Criteria pollutant emissions from construction of the above-listed project elements were analyzed for the anticipated construction years of 2024 to 2028. Similarly, operational emissions that are projected to result from the Proposed Action were analyzed for three years: 2026 (implementation year), 2031 (project implementation plus 5 years), and 2036 (project implementation plus 10 years). Net operational emissions were evaluated by comparison of the Proposed Action and the No Action Alternative. The No Action Alternative is the forecasted operational scenario that would exist without the proposed modifications. Proposed Action construction and operational emissions are described in more detail in **Appendix B**.



Figure 3.1. DFW General Location

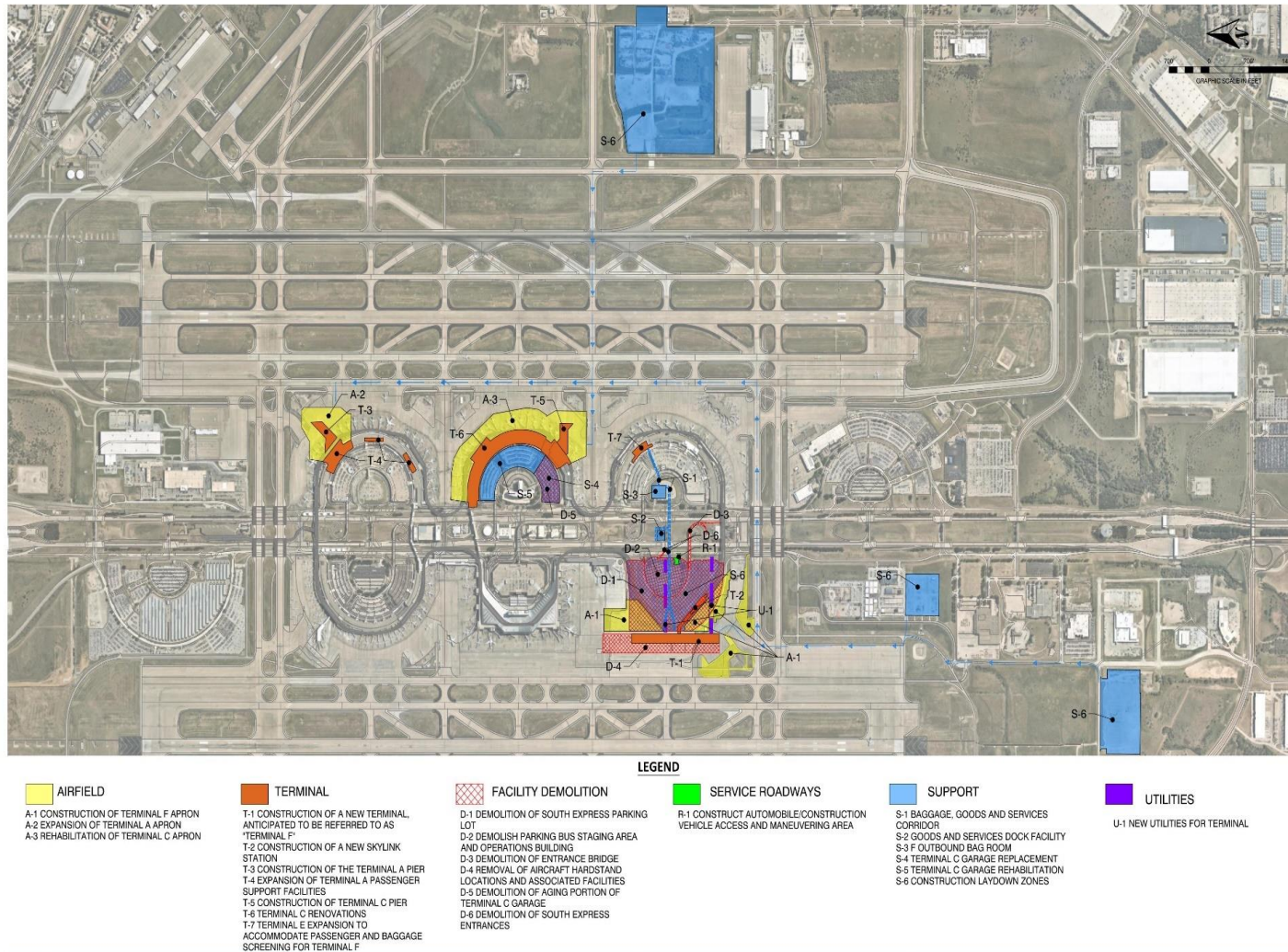


Figure 3.2. Project Site Plan

3.2 Proposed Action Implementation Schedule

Construction of the Proposed Action Alternative is anticipated to take four years starting in Spring 2024. The construction of Piers C and A are anticipated to take 24 months starting in Spring 2024. Terminal C renovations are anticipated to take three years, estimated to commence in November 2025. Construction of Terminal F and associated improvements at Terminal E are expected to take approximately two years starting in mid-2024 Terminal C Garages and Roadways are anticipated to take 30 months beginning in early 2024. Operation of the Proposed Action would begin in 2026, prior to the completion of construction in 2028.

3.3 Construction Schedule and Scenarios

As previously discussed, construction is assumed to start in 2024 and would last for 5 years, ending in 2028. The construction schedule of the subprojects is shown in **Table 3-1** below and discussed in more detail in **Appendix B**.

Table 3-1. CTA Expansion Project Anticipated Construction Schedule

Activity Description	Estimated Start Date	Estimated End Date
Contractor Mobilization, Construction of laydown areas and pre-fabrication yards	January 2024	April 2024
Batch plants set up and operations	January 2024	December 2028
Demolition of obsolete and aging infrastructure, and Removal of Aircraft Hardstand any conflicting facilities/utilities;	January 2024	July 2024
Construction of vehicle access roads and maneuvering/ turn-around areas	March 2024	June 2024
Construction of Terminal F Utilities, Baggage, Goods, and Service Corridor and Goods and Service Dock Facility	January 2024	September 2025
Construction of the Terminal A Pier and Terminal C Pier	January 2024	May 2026
Construction of a New Terminal F and New Skylink Station	June 2024	May 2026
Terminal E Expansion	September 2024	December 2025
Expansion of Terminal A Passenger Support Facilities	January 2025	December 2025
Construction of Terminal F Apron	January 2025	May 2025
Expansion of Terminal A Apron	January 2025	May 2026
Terminal C Garage partial Rehabilitation and Replacement of Garage Section C	June 2025	July 2027
F Outbound Bag Room	July 2025	July 2026
Terminal C Renovations	November 2025	December 2028
Rehabilitation of Terminal C Apron	January 2026	May 2027

Source: Table 2-1 in Appendix H – AQTR (Ramboll and HMMH 2023)

Fiscal year (FY) 2022, a 12-month period spanning October 1, 2021, through September 30, 2022, was identified as the existing condition year and served as the source data for existing conditions. However, for the purposes of this report, emissions were adjusted to calendar year (CY) by comparing the modeled operations (FY2022) to the total reported operations for CY2022 and applying an adjustment factor to the emissions inventory. Construction of the Proposed Action is expected to begin in 2024, and thus, construction emissions from 2024 through 2028 were quantified. The proposed projects would be complete and operational in 2026, which represents the Proposed Action implementation year. Year 2031 was analyzed as the year of implementation plus five years and 2036 is included as the year of implementation plus 10 years. These analysis years enable FAA to consider the emissions in accordance with the rules described in Section 2.2 of this document.

3.4 General Conformity Applicability Analysis

As stated above, for the applicability analysis, the impacts to air quality due to the Proposed Action were evaluated under NEPA in accordance with the guidelines provided in the *FAA Aviation Emissions and Air Quality Handbook Version 3 Update 1* (FAA Handbook); FAA Order 5050.4B, *NEPA Implementing Instructions for Airport Actions*; and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*.

Criteria pollutant emissions associated with construction and operation of the Proposed Action were estimated for the applicability analysis. Proposed Action construction emission estimates were developed based on (i) construction equipment activity estimates for vehicles, non-road equipment, and project dimensions provided by DFW and based on the Airport Construction Emissions Inventory Tool (ACEIT)⁸ and (ii) emission factors from the EPA Motor Vehicle Emission Simulator, version 3 (MOVES3)⁹ and EPA AP-42 guidance¹⁰. The TCEQ Texas NONROAD version 2 (TexN2.2 Utility) model was used to estimate Texas-specific (at the county level) emissions from nonroad mobile sources, excluding commercial marine vessels, locomotives, drilling rigs, and aircraft. Proposed Action operational emission estimates were developed based on (i) aircraft, ground support equipment (GSE), auxiliary power unit (APU), and vehicle traffic activity estimates for the Proposed Action and No Action and (ii) FAA's Aviation Environmental Design Tool (AEDT) Version 3e¹¹ and emission factors from EPA's MOVES3.

In performing the applicability analysis, resulting emissions from the Project were examined in two phases as required by 40 CFR 51 and 93: 1) direct emissions (emissions released directly as a result of construction and supporting activities); and 2) indirect emissions (emissions increases associated with enhanced operations post-construction).

⁸ Transportation Research Board (TRB). 2014. Airport Construction Emissions Inventory Tool. Available at: <https://www.trb.org/Main/Blurbs/170234.aspx>. Accessed: August 2023.

⁹ US Environmental Protection Agency. 2023. Motor Vehicle Emission Simulator, Version 3 (MOVES3). Available at: <https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves>. Accessed: August 2023.

¹⁰ US Environmental Protection Agency. 1995. AP-42: Compilation of Air Emissions Factors. Available at: <https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors>. Accessed: August 2023.

¹¹ Federal Aviation Administration. Aviation Environmental Design Tool (AEDT). Available at: <https://aedt.faa.gov/>. Accessed: August 2023.

Once de minimis is exceeded, conformity with the SIP can be demonstrated the following ways:¹²

1. A written determination from the state/local air quality agency stating that the emissions from the proposed action, together with all other emissions in the nonattainment or maintenance area would not exceed the emissions budget in the SIP.
2. A written commitment from the Governor, or the Governor's designed for SIP actions, to include the emissions in a revised SIP (this automatically results in a call for a SIP revision).
3. Offsetting or mitigating proposed action emissions so there is no net increase within the nonattainment or maintenance area.
4. The applicable Metropolitan Planning Organization (MPO) determines that the emissions from the project or portion of the project, are included in a conforming transportation plan and transportation improvement program.

3.5 Attainment Status of the Dallas-Fort Worth Area

The Dallas-Fort Worth metropolitan area has been designated as an attainment area for all EPA criteria pollutants except for O₃ based on air quality monitoring data collected by the TCEQ^{13,14}. The DFW Air Quality Control Region (AQCR) 215 ozone nonattainment area is shown in **Figure 3.3**. The current air quality design values and attainment statuses is shown in **Table 3-2**.

The Dallas-Fort Worth metropolitan area is designated as a "severe" nonattainment area for the 2008 8-hour, 0.075 parts per million (ppm) Ozone standard, as of 07 October 2022, effective 07 November 2022 (87 Federal Register (FR) 60926). The Dallas-Fort Worth metropolitan area is also designated as a "moderate" nonattainment area under the 2015 8-hour, 0.070 ppm Ozone standard as of 07 November 2022 (87 FR 60897).

¹² EPA. 2022. Frequent Questions about General Conformity. Available online: <https://www.epa.gov/general-conformity/frequent-questions-about-general-conformity#:~:text=get%20more%20information%3F-,What%20is%20the%20General%20Conformity%20Rule%3F,national%20ambient%20air%20quality%20standards>. Accessed: August 2023.

¹³ TCEQ. 2022. Texas Air Monitoring Information System (TAMIS) Web Interface. Site List. Available online: https://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=report.site_list. Accessed: August 2023.

¹⁴ EPA. 2023. Design Value Interactive Tool. Available: <https://www.epa.gov/air-trends/design-value-interactive-tool>. Accessed: August 2023.

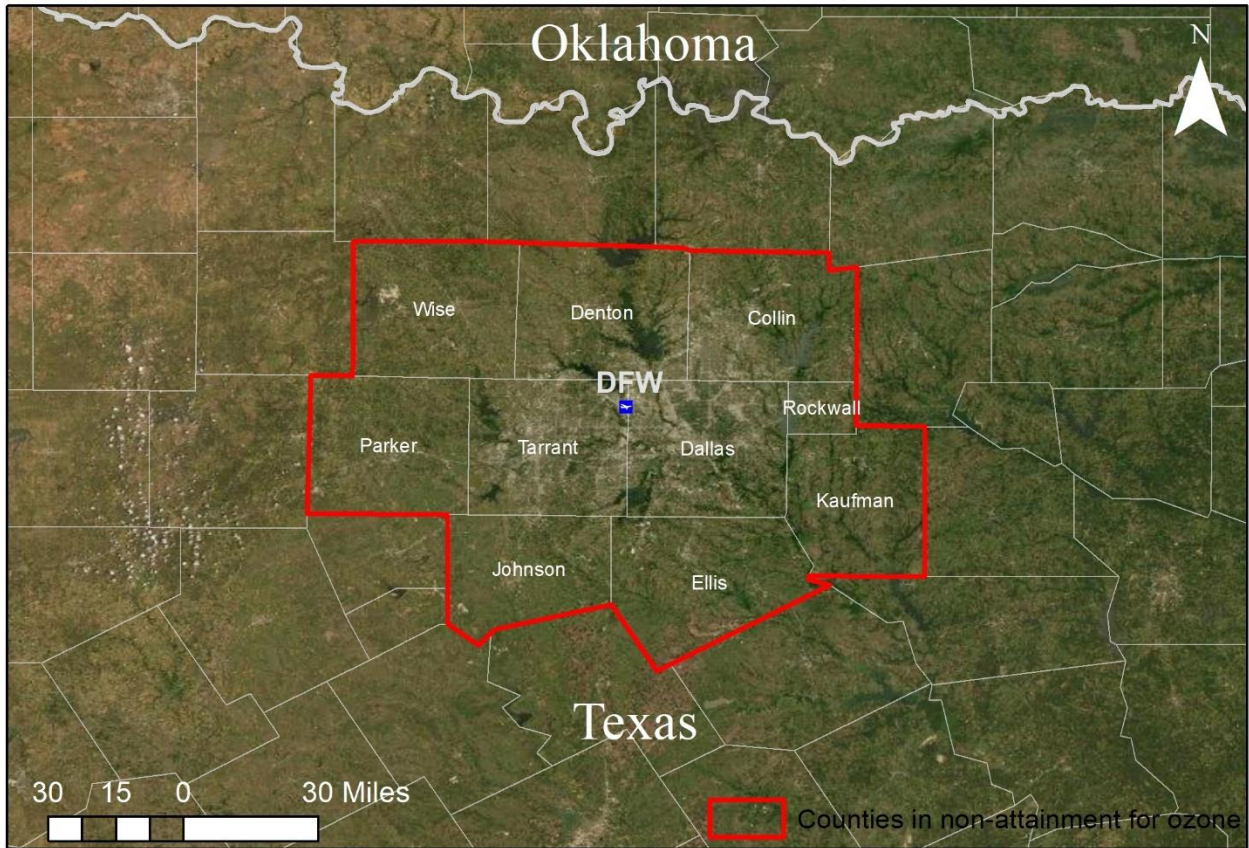


Figure 3.3. Location of Dallas Fort-Worth International Airport and the counties in nonattainment for O₃

Table 3-2. Current Air Quality at Dallas-Fort Worth-Arlington, Texas^a

Pollutant	Federal Standard	Design Value ^b	Monitoring Years	Current Status
Carbon Monoxide (CO)	9 ppm (8-hour)	1.3 ppm	2021-2022	Attainment ^c
	35 ppm (1-hour)	1.9 ppm	2021-2022	Attainment
Lead (Pb)	0.15 µg/m ³ (3-month)	0.02 µg/m ³	2020-2022	Attainment
Nitrogen Dioxide (NO ₂)	53 ppb (annual)	14 ppb	2021-2022	Attainment
	100 ppb (1-hour)	48 ppb	2020-2022	Attainment
Ozone (O ₃)	0.070 ppm (8-hour)	0.077 ppm	2020-2022	Severe Nonattainment ^d (2008 Standard)
Coarse Particulate Matter (PM ₁₀)	150 µg/m ³ (24-hour)	N.A. ^e	N.A.	Attainment
Fine Particulate Matter (PM _{2.5}) ^f	12 µg/m ³ (annual)	9.4 µg/m ³	2020-2022	Attainment
	35 µg/m ³ (24h primary)	24 µg/m ³	2020-2022	Attainment
Sulfur Dioxide (SO ₂)	75 ppb (1-hour)	10 ppb	2020-2022	Attainment
	0.5 ppm (3-hour)	N.A.	N.A.	Attainment

Notes:

ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter

PM_{2.5} = particulate matter with a diameter less than 2.5 micrometers (µm); PM₁₀ = particulate matter with a diameter less than 10 micrometers (µm)

^a Design values shown in the table are the highest among monitors with valid design values from available Air Quality System (AQS) sites in the Dallas-Fort Worth-Arlington, TX area. 8-hour and 1-hour design values for CO are based on AQS site 481130069 in Dallas County and 484391053 in Tarrant County, respectively; design value for Pb is based on AQS site 480850029 in Collin County; annual and hourly design values for NO₂, are based on AQS sites 484391053 and 484391002 for Tarrant County, respectively; design value for O₃ are based on AQS site 481211032 in Denton County; annual and 24 hour design values for PM_{2.5}, are based on AQS sites 481130050 in Dallas County and 484391006 for Tarrant County, respectively; design values for SO₂ are based on AQS site 482570005 in Kaufman County.

^b Design values are commonly used to classify nonattainment areas and are defined as statistics that describe the air quality status of a given location relative to the level of the NAAQS.

^c An attainment area is a geographic area that meets or does better than the primary standard defined in the NAAQS.

^d A nonattainment area is a homogeneous geographical area (usually referred to as an air quality control region) that is in violation of one or more NAAQS and has been designated as nonattainment by the EPA.

^e N.A. = Not available; no design value is available for the monitoring location. An area with no design value available is automatically in attainment since design values are used to classify nonattainment areas.

^f The EPA has proposed to strengthen the air quality standard for primary annual PM_{2.5} from 12 µg/m³ to a value between 9 and 10 µg/m³. The EPA is also taking comments on the full range (8 to 11 µg/m³) included in the Clean Air Scientific Advisory Committee's latest report. The EPA is proposing to retain the 24-hour standard of 35 µg/m³ while taking comments on revising the level to as low as 25 µg/m³. The proposed rule was published in the Federal Register on Jan 27, 2023; public comments will be accepted for 60 days.

Sources:

EPA. 2023. Green Book. 8-Hour Ozone (2015) Designated Area Design Values. July 31, 2023. Available: <https://www3.epa.gov/airquality/greenbook/jdtc.html>. Accessed: August 2023.

EPA. 2023. Air Quality Design Values. 2022 Design Value Reports. May 25. Available: <https://www.epa.gov/air-trends/air-quality-design-values#report>. Accessed: August 2023.

EPA. 2023. NAAQS Table. Available: <https://www.epa.gov/criteria-air-pollutants/naaqs-table>. Accessed: August 2023.

EPA. 2022. Interactive Map of Air Quality Monitors. Available: <https://www.epa.gov/outdoor-air-quality-data/interactive-map-air-quality-monitors>. Accessed: August 2023.

EPA. 2023. Design Value Interactive Tool. Available: <https://www.epa.gov/air-trends/design-value-interactive-tool>. Accessed: August 2023.

3.6 Exemptions from General Conformity Requirements

The General Conformity requirements apply to Federal actions in nonattainment or maintenance areas if the total direct and indirect criteria pollutant or precursor emissions would equal or exceed the *de minimis* thresholds, except for the exemptions under 40 CFR Part 93 Subpart B as summarized below¹⁵.

- Actions, such as administrative actions and routine maintenance and repair, which would result in no emissions increase or an increase in emissions that is clearly below the *de minimis* threshold.
- Actions where the emissions are not reasonably foreseeable.
- The portion of an action that include major or minor stationary sources that require a permit under the New Source Review (NSR) program or the prevention of significant deterioration program.
- Actions in response to emergencies or natural disasters.
- Actions, such as air quality research and investigations, which would incur no environment detriment.
- Actions that include alteration and addition of existing structures as required by environmental legislation or regulations.
- Actions that include direct emissions from remedial and removal measures carried out under the Comprehensive Environmental Response, Compensation and Liability Act, and other applicable regulations.

The Proposed Action includes two (2) concrete batch plants and one (1) asphalt batch plant as part of the construction activities. Batch plants are stationary sources of air emissions permitted through the TCEQ NSR permit program. The NSR permit process would be completed and approved for each batch plant before construction begins. Emissions from permitted stationary sources are accounted for in the SIP and are therefore not included in the General Conformity analysis.

The General Conformity requirements allow individual Federal agencies to specify actions that are “presumed to conform.” The FAA has published a list of 15 presumed to conform actions in the Federal Register on 30 July 2007¹⁶. The Proposed Action is not presumed to conform.

¹⁵ EPA. 40 CFR Part 93 Subpart B. Available at: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-93/subpart-B>

¹⁶ 72 FR 41565. Available at: <https://www.federalregister.gov/documents/2007/07/30/07-3695/federal-presumed-to-conform-actions-under-general-conformity>. Accessed: August 2023

3.7 De minimis Thresholds

The General Conformity regulations, under Section 176(c) of the CAA, dictate the process federal agencies use to demonstrate how their actions will not interfere with the prevention and control of air pollution within states' and tribes' nonattainment and maintenance areas for timely attainment of the NAAQS. In accordance with General Conformity regulations, the maximum annual potential Project emissions were compared against *de minimis* thresholds for NOx and VOCs (see **Table 3-3**). As of November 2022, the Dallas-Fort Worth nonattainment area is designated as a “Severe” O₃ nonattainment area; therefore, the 25 tons/year *de minimis* threshold for VOCs or NOx applies.

Table 3-3. General Conformity De Minimis Thresholds for Nonattainment Areas

Pollutant	De Minimis Threshold ¹⁷ (tons/year)
O₃ (VOCs or NOx):	
Serious NAA's	50
Severe NAA's	25
Extreme NAA's	10
Other O ₃ NAA's outside an O ₃ transport region	100
Other O₃ NAA's outside an O₃ transport region:	
VOC	50
NOx	100
Carbon Monoxide:	
All maintenance areas	100
SO₂ or NO₂: All NAA's	100
PM₁₀:	
Moderate NAA's	100
Serious NAA's	70
PM_{2.5} (direct emissions, SO₂, NOx, VOC, and Ammonia):	
Moderate NAA's	100
Serious NAA's	70
Pb: All NAA's	25

Source: 40 CFR Part 91.153(b)

4. Applicability Analysis for the Proposed Federal Action

4.1 Methodology

The general methodology for developing the emission inventories and conducting the general conformity evaluation were documented in the *General Conformity Protocol for the DFW Airport Central Terminal Area Expansion Project*, finalized in May 2023 with updates per TCEQ review and input. The purpose of the General Conformity Protocol (“Protocol”) is to document in advance any data to be collected and analyzed, to document the approach to the analysis, and to obtain input

¹⁷ EPA *de minimis* thresholds are available at <https://www.epa.gov/general-conformity/de-minimis-tables>. Accessed: August 2023

from the FAA and TCEQ. The Protocol is included in **Appendix A**. Some project features have changed since the submission of the Protocol. Methodology for the emissions analyses is further discussed where it deviates from the Protocol and the details are provided in **Appendix B**.

4.2 Estimated Emissions

The emissions analysis includes the direct emissions from the construction of the Proposed Action and the indirect emissions from the operation of the Proposed Action.

4.2.1 Construction Emissions Analysis

The No Action Alternative would not involve any construction activities or any associated construction emissions.

The Proposed Action construction emissions were evaluated for years 2024 through 2028. The Proposed Action would involve some construction and expansion of terminals A, C, E, and F. Construction emissions depend on the activity levels of heavy-duty construction equipment, haul truck trips, and vehicle trips made by construction workers and vendors traveling to and from the project site.

The Proposed Action would generate emissions from heavy-duty construction equipment activity, truck haul trips, and construction worker and vendor truck trips to and from the project areas. Construction emissions include both on-road mobile and off-road source categories.

Mobile source exhaust and fugitive dust emissions would be generated from on-road vehicles and construction equipment, including but not limited to dump trucks, mixers, passenger vehicles, flatbed trucks, and tractor trailers. Fugitive VOC emissions would be generated by asphalt drying. Emissions of criteria air pollutants and O₃ precursors include emissions of NO_x, CO, SO₂, VOCs, PM₁₀, and PM_{2.5}. Of these, NO_x and VOCs are the two primary precursors to O₃ formation.

Under 40 CFR 93.153(d)(1), the emissions from the two (2) concrete batch plants and one (1) asphalt batch plant are exempt from the General Conformity requirements since the batch plants are stationary sources of air emissions permitted through the TCEQ NSR permit program. The NSR permit process would be completed and approved for each batch plant before construction begins. Emissions from permitted stationary sources are accounted for in the SIP and are therefore not included in the General Conformity analysis.

Table 4-1 presents the estimated NO_x and VOC emissions associated with all construction elements of the Proposed Action by emissions source and year. The details of the analysis are provided in Appendix B.

Table 4-1. Project-Related Construction Emissions Inventory

Project Year	Emissions Source	Emissions (tons/yr)	
		NO _x	VOC
2024	Onroad	12.13	2.99
2024	Nonroad	11.47	1.07
2024	Fugitives	-	0.02
2024	Total	23.61	4.09
2025	Onroad	14.63	6.85
2025	Nonroad	21.17	1.93
2025	Fugitives	-	-
2025	Total	35.80	8.77
2026	Onroad	10.57	2.40
2026	Nonroad	11.25	0.95
2026	Fugitives	-	-
2026	Total	21.82	3.35
2027	Onroad	1.79	0.45
2027	Nonroad	3.35	0.28
2027	Fugitives	-	-
2027	Total	5.14	0.73
2028	Onroad	0.63	0.25
2028	Nonroad	1.50	0.12
2028	Fugitives	-	-
2028	Total	2.14	0.37

Source: Ramboll, 2023

4.2.2 Operational Emissions Analysis

The operational emissions from aircraft and vehicle traffic activities for the No Action Alternative and Proposed Action alternatives were evaluated for years 2022, 2026, 2031, and 2036. The 2027 and 2028 operational phase emission estimates are linear interpolations of 2026 and 2031 emissions for use in comparison to the General Conformity *de minimis* thresholds.

The operational emissions inventory for the No Action Alternative and the Proposed Action are provided in **Table 4-2** and **Table 4-3**, respectively. **Table 4-4** presents the net project-related operational NO_x and VOC emissions (i.e., Proposed Action less No Action emissions) to quantify the incremental operational emissions changes estimated to occur for the Proposed Action. Aircraft, GSE, APUs, and vehicle traffic emissions are all expected to increase under the Proposed Action relative to the No Action Alternative. The details of the analysis are provided in **Appendix B**.

Table 4-2. No Action Operational Emissions Inventory

Project Year	Emissions Source	Emissions (tons/yr) ^a	
		NOx	VOC
2026	Aircraft ^b	4,896	473
2026	GSE	73	28
2026	APU	149	11
2026	Traffic	183	42
2026	Total	5,301	554
2027	Aircraft ^b	4,920	474
2027	GSE	72	28
2027	APU	150	11
2027	Traffic	169	40
2027	Total	5,311	553
2028	Aircraft ^b	4,944	474
2028	GSE	71	28
2028	APU	151	11
2028	Traffic	156	38
2028	Total	5,322	551
2031	Aircraft ^b	5,016	475
2031	GSE	68	28
2031	APU	153	11
2031	Traffic	116	32
2031	Total	5,353	546
2036	Aircraft ^b	5,095	480
2036	GSE	67	29
2036	APU	156	11
2036	Traffic	96	28
2036	Total	5,414	547

^a 2027 and 2028 operational phase emission estimates are linear interpolations of 2026 and 2031 emissions for use in comparison to General Conformity de minimis thresholds.

^b Includes emissions associated with taxi-in, taxi-out and in-flight operations below mixing height, commonly referred to as the Landing and takeoff cycle (LTO)

Source: HMMH, 2023 and Ramboll, 2023

Table 4-3. Proposed Action Operational Emissions Inventory¹⁸

Project Year	Emissions Source	Emissions (tons/yr) ^a	
		NOx	VOC
2026	Aircraft ^b	4,946	477
2026	GSE	73	29
2026	APU	151	11
2026	Traffic	183	42
2026	Total	5,352	558
2027	Aircraft ^b	5,044	483
2027	GSE	73	29
2027	APU	154	11
2027	Traffic	171	41
2027	Total	5,442	564
2028	Aircraft ^b	5,142	490
2028	GSE	73	29
2028	APU	157	11
2028	Traffic	160	39
2028	Total	5,532	569
2031	Aircraft ^b	5,436	509
2031	GSE	72	30
2031	APU	167	12
2031	Traffic	125	34
2031	Total	5,801	586
2036	Aircraft ^b	5,984	550
2036	GSE	77	33
2036	APU	185	12
2036	Traffic	111	32
2036	Total	6,357	628

^a 2027 and 2028 operational phase emission estimates are linear interpolations of 2026 and 2031 emissions for use in comparison to General Conformity de minimis thresholds.

^b Includes emissions associated with taxi-in, taxi-out and in-flight operations below mixing height.

Source: HMMH, 2023 and Ramboll, 2023

¹⁸ Emissions totals represent the total DFW operational emissions from the project.

Table 4-4. Net Project-Related Operational Emissions Inventory¹⁹

Project Year	Emissions Source	Emissions (tons/yr) ^a	
		NOx	VOC
2026	Aircraft ^b	49	3.6
2026	GSE	0.40	0.17
2026	APU	1.3	0.16
2026	Traffic	0.13	0.031
2026	Total	51	3.9
2027	Aircraft ^b	123	10
2027	GSE	1.2	0.52
2027	APU	3.8	0.37
2027	Traffic	2.0	0.53
2027	Total	130	11
2028	Aircraft ^b	198	16
2028	GSE	2.0	0.88
2028	APU	6.4	0.58
2028	Traffic	3.8	1.0
2028	Total	210	18
2031	Aircraft ^b	420	34
2031	GSE	4.3	1.9
2031	APU	14	1.2
2031	Traffic	9.3	2.5
2031	Total	447	40
2036	Aircraft ^b	889	71
2036	GSE	9.4	4.4
2036	APU	30	1.6
2036	Traffic	15	4.4
2036	Total	943	81

^a 2027 and 2028 operational phase emission estimates are linear interpolations of 2026 and 2031 emissions for use in comparison to General Conformity *de minimis* thresholds.

^b Includes emissions associated with taxi-in, taxi-out and in-flight operations below mixing height.

Note: net project-related emissions reflect the difference in emissions caused by the project over the same year emissions with the No Action alternative.

Source: HMMH, 2023 and Ramboll, 2023

4.2.3 Combined Construction and Operational Emissions

To enable comparison to the *de minimis* thresholds, it is necessary to add within the respective years, the construction emissions to the operational emissions.

4.3 Comparison to the *de minimis* Thresholds and Applicability Determination

As of November 2022, the Dallas-Fort Worth Metropolitan area has been reclassified as “severe” nonattainment for the 2008 8-hour O₃ standard, and the resulting *de minimis* thresholds is 25 tpy for

¹⁹ Emissions totals represent the net operational emissions (i.e. Proposed Action minus No Action operational emissions).

both NO_x and VOCs. The Emissions Inventory for direct and indirect project-related emissions for the Proposed Federal Action forecasts that VOC emissions would remain well below the *de minimis* threshold for 2024 through 2028 and would exceed the *de minimis* threshold for 2031 and 2036, which triggers the need for a General Conformity Determination for VOC. The combined direct and indirect project-related NO_x emissions from the Proposed Federal Action are expected to exceed the *de minimis* thresholds for 2025 through 2028, as well as future years 2031 and 2036, which triggers the need for a General Conformity Determination for NO_x. The detailed construction and operational emissions inventories are reported in the September 2023 Air Quality Assessment Technical Report, included in **Appendix B. Table 4-5** below compares net project-related emissions to the applicable *de minimis* thresholds.

Table 4-5. Net Project-Related Emissions

Source	NO _x	VOCs
2024 (tons)		
Proposed Action		
Construction	23.6	4.1
Operation	NA	NA
Total Proposed Action	23.6	4.1
Total No Action	NA	NA
Project-related emissions (difference between No Action and Proposed Action)	23.6	4.1
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	No	No
2025 (tons)		
Proposed Action		
Construction	35.8	8.8
Operation	NA	NA
Total Proposed Action	35.8	8.8
Total No Action	NA	NA
Project-related emissions	35.8	8.8
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	No
2026 (tons)		
Proposed Action		
Construction	21.8	3.3
Operation	5,352.3	558.4
Total Proposed Action	5,374.1	561.8
Total No Action	5,301.0	554.5
Project-related emissions (difference between No Action and Proposed Action)	73.1	7.3
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	No
2027 (tons)		

Source	NO _x	VOCs
Proposed Action		
Construction	5.1	0.7
Operation	5,441.9	563.9
Total Proposed Action	5,447.1	564.6
Total No Action	5,311.5	552.8
Project-related emissions (difference between No Action and Proposed Action)	135.6	11.8
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	No
2028-2030 (tons)		
Proposed Action		
Construction	2.1	0.4
Operation	5,531.6	569.3
Total Proposed Action	5,533.7	569.7
Total No Action	5,321.9	551.1
Project-related emissions (difference between No Action and Proposed Action)	211.8	18.6
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	No
2031-2035 (tons)		
Proposed Action		
Construction	NA	NA
Operation	5,800.5	585.7
Total Proposed Action	5,800.5	585.7
Total No Action	5,353.3	545.9
Project-related emissions (difference between No Action and Proposed Action)	447.2	39.8
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	Yes
2036 (tons)		
Proposed Action		
Construction	NA	NA
Operation	6,356.9	627.7
Total Proposed Action	6,356.9	627.7
Total No Action	5,414.1	546.8
Project-related emissions (difference between No Action and Proposed Action)	942.8	80.9
<i>De Minimis</i> Threshold	25	25
Does Project-related Emissions Exceed <i>De Minimis</i>?	Yes	Yes

NA= not applicable

- Note for the No Action, no project-related construction would occur; the No Action represents operational emissions.
- Detailed emission inventory summaries are provided in Table 4-1, Table 4-2, and Table 4-3 for project-related construction emissions, No Action operational emissions, and Proposed Action operational emissions, respectively.

Source: HMMH, 2023 and Ramboll, 2023

5. General Conformity Determination

This section discusses the criteria and general methods used to evaluate the Proposed Action's demonstration of conformity with the current SIP.

5.1 Designation of Applicable SIP

The applicable SIP for general conformity purposes in the DFW ozone nonattainment area is the latest approved revision to the 2020 Serious RFP SIP, (*also referred to as the 2020 Serious RFP SIP Revision*). This SIP revision provides emissions inventory for various mobile source categories including non-road equipment and on-road vehicles. The target attainment year for this SIP RFP is 2020 with 2021 as a contingency year.

5.2 Comparison to the Applicable SIP for General Conformity

DFW Airport staff met with TCEQ to review the Proposed Action and its expected emissions. During those coordination meetings, TCEQ noted the attainment year emissions inventories approved in the 2020 Serious RFP SIP as well as the quantification of overall excess creditable RFP emissions reductions available after meeting the milestone-year emissions reduction targets for NO_x and VOC and establishing motor vehicle emissions budgets (MVEB) for transportation conformity (40 CFR §93.101).²⁰ To assess conformity to the SIP for the Proposed Action, TCEQ allocated the overall excess creditable RFP emissions reductions quantified in the applicable SIP according to source categories based on the RFP emissions reductions attributed to each source category and accounting for previously proposed federal actions that relied on the current applicable SIP revision to demonstrate conformity. TCEQ compared emissions for the Proposed Action to those allocations. TCEQ confirmed that projects not included in the approved SIP could increase the non-road source category emissions by a maximum amount of 4.43 tpd NO_x (i.e. 4.97 tpd minus 0.54 tpd used by 19th Street Cargo Project in years 2025 and beyond) and 4.77 tpd VOC, without changing the result of the RFP demonstration; projects not included in the approved SIP could increase the on-road source category emissions by a maximum amount of 26.26 tpd NO_x and 12.55 tpd VOC²¹.

To identify whether the Proposed Action-related emissions are less than the 2020 Serious RFP SIP excess emissions, the total direct and indirect project related NO_x and VOC emissions in tpy were converted to an average annual day (tpd). **Table 5-1** for NO_x and **Table 5-2** for VOC translates the project-related emissions from tpy to tpd for comparison to the available excess creditable RFP emission reductions.

The total direct and indirect project-related NO_x and VOC emissions were compared to the excess emissions for all years. The Proposed Action would exceed applicable *de minimis* thresholds for NO_x

²⁰ As described in the SIP revision, the nonattainment region is required to demonstrate a 9% emissions reduction in ozone precursors from January 1, 2018 through December 31, 2020, a 3% emissions reduction from January 1, 2021 through December 31, 2021 for attainment year RFP contingency, and RFP motor vehicle emissions budgets for the 2020 attainment year. These emission reduction periods are referred to as milestones. Excess emission reductions are those remaining after considering the required milestone reductions and the motor vehicle emission budgets.

²¹ Note that while 4.97 tpd NO_x and 4.77 tpd VOC was available for nonroad and 26.26 tpd NO_x and 12.55 tpd VOC for on-road sources, DFW Airport has used a portion of the excess emissions for the 19th Street Cargo Project, which was approved in a General Conformity Determination by TCEQ on October 2, 2023. The 19th Street Cargo Project requires 0.542 tpd NO_x for nonroad sources and 0.004 tpd NO_x for on-road sources in 2025; and 0.536 tpd NO_x for nonroad sources in 2026 and beyond. The 19th Street Cargo Project does not exceed VOC emissions for any years.

in 2025 through 2036 and for VOCs in 2031 through 2036. Based on the comparison, the Proposed Action-related non-road and on-road emissions are less than the 2020 Serious RFP SIP excess emissions for the respective source category emissions.

Table 5-1. Project-Related NO_x Emissions

Source of Project Emissions	Total Emissions		Available Excess Creditable RFP Emissions Reductions (tpd) ^{a, b, c}
	Annual Emissions (tpy)	Daily Emissions (tpd)	
2024			
Non-Road Mobile Sources	11.47	0.031	4.97
On-Road Mobile Sources	12.13	0.033	26.26
2025			
Non-Road Mobile Sources	21.17	0.058	4.43
On-Road Mobile Sources	14.63	0.040	26.26
2026			
Non-Road Mobile Sources	62.37	0.171	4.43
On-Road Mobile Sources	10.70	0.029	26.26
2027			
Non-Road Mobile Sources	131.83	0.361	4.43
On-Road Mobile Sources	3.76	0.010	26.26
2028			
Non-Road Mobile Sources	207.34	0.568	4.43
On-Road Mobile Sources	4.44	0.012	26.26
2031-2035			
Non-Road Mobile Sources	437.92	1.200	4.43
On-Road Mobile Sources	9.33	0.026	26.26
2036			
Non-Road Mobile Sources	927.72	2.542	4.43
On-Road Mobile Sources	15.06	0.041	26.26

^a Overall excess creditable RFP emissions reductions available after meeting the milestone-year emissions reduction targets for NO_x and VOC and establishing motor vehicle emissions budgets (MVEB) for transportation conformity.

^b The available excess creditable RFP emissions reductions include adjustments for the emissions from DFW Airport's approved 19th Street Cargo Project, which exceeds NO_x emissions for years 2025 and beyond.

Available excess nonroad emissions = 4.97 tpd NO_x – 19th Street Cargo Project excess emissions (tpd).

Available excess on-road emissions = 26.26 tpd NO_x – 19th Street Cargo Project excess emissions (tpd).

^c Values may not match exactly due to rounding.

Source: Ramboll, 2023

Table 5-2. Project-Related VOC Emissions

Source of Project Emissions	Total Emissions		Available Excess Creditable RFP Emissions Reductions (tpd) ^{a,b}
	Annual Emissions (tpy)	Daily Emissions (tpd)	
2024			
Non-Road Mobile Sources	1.07	0.003	4.77
On-Road Mobile Sources	2.99	0.008	12.55
2025			
Non-Road Mobile Sources	1.93	0.005	4.77
On-Road Mobile Sources	6.85	0.019	12.55
2026			
Non-Road Mobile Sources	4.86	0.013	4.77
On-Road Mobile Sources	2.43	0.007	12.55
2027			
Non-Road Mobile Sources	10.86	0.030	4.77
On-Road Mobile Sources	0.98	0.003	12.55
2028			
Non-Road Mobile Sources	17.36	0.048	4.77
On-Road Mobile Sources	1.28	0.004	12.55
2031-2035			
Non-Road Mobile Sources	37.23	0.102	4.77
On-Road Mobile Sources	2.54	0.007	12.55
2036			
Non-Road Mobile Sources	76.53	0.210	4.77
On-Road Mobile Sources	4.36	0.012	12.55

^a Overall excess creditable RFP emissions reductions available after meeting the milestone-year emissions reduction targets for NO_x and VOC and establishing motor vehicle emissions budgets (MVEB) for transportation conformity.

^b The available excess creditable RFP emissions reductions are unadjusted since the DFW Airport's approved 19th Street Cargo Project does not exceed VOC emissions for any years.

Source: Ramboll, 2023

5.3 Comparison to the NAAQS

Conformity means that a proposed federal action will not cause or contribute to any new violation of any NAAQS; not increase the frequency or severity of any existing violation of any NAAQS; and not delay timely attainment of any NAAQS or any required interim emission reductions or other milestones (42 USC 7506(c)(1)(B)). The general conformity regulations allow that local and/or area wide air quality modeling may be used to demonstrate that these requirements are met in support of a positive General Conformity Determination (40 CFR 93.158(a)(3) and 40 CFR 93.158(a)(4)(i)). Emissions inventories were developed for both direct and indirect sources of project-related emissions. These models indicated that a *de minimis* exceedance for both ozone precursors; the NO_x *de minimis*

would be exceeded in 2025 through 2036 whereas the VOC de minimis would be exceeded 2031 through 2036. No other criteria pollutants were found to be above the threshold levels.

5.4 Consistency with Requirements and Milestones in the Applicable SIP

The General Conformity Regulations state that, notwithstanding the other requirements of the rule, a proposed action may not be determined to conform unless the total of direct and indirect emissions from the action complies or is consistent with all relevant requirements and milestones in the applicable SIP (40 CFR 93.158(c)). This includes but is not limited to such issues as reasonable further progress schedules, assumptions specified in the attainment or maintenance demonstration, prohibitions, numerical emission limits, and work practice standards. This section briefly addresses how the Proposed Action was assessed for SIP consistency for this evaluation.

5.4.1 Applicable Requirements from the EPA

The EPA has promulgated, and will continue to promulgate, numerous requirements to support the goals of the CAA with respect to the NAAQS. Typically, these requirements take the form of rules regulating emissions from significant new sources, including emission standards for major stationary point sources and classes of mobile sources, as well as permitting requirements for new major stationary point sources. Since states have the primary responsibility for implementation and enforcement of requirements under the CAA and can impose stricter limitations than the EPA, the EPA requirements often serve as guidance to the states in formulating their air quality management strategies.

5.4.2 Consistency with Applicable Requirements

In operating the Airport, DFW already complies with, and will continue to comply with, a myriad of rules and regulations implemented and enforced by federal, state, regional, and local agencies to protect and enhance ambient air quality in the AQCR 215. DFW will continue to comply with all existing applicable air quality regulatory requirements for activities over which it has direct control and will meet in a timely manner all regulatory requirements that become applicable in the future. Likewise, DFW actively encourages all tenants and users of its facilities to comply with applicable air quality requirements.

5.5 Conclusion

Within areas designated nonattainment or maintenance for any of the NAAQS, the CAA requires that federal agencies ensure that their actions conform to the applicable SIP. The requirements for determining conformity to SIPs are detailed in 40 CFR 51 and 40 CFR 93.

In accordance with Section 176(c) of the CAA, the FAA has assessed whether pollutant and pollutant precursor emissions that would result from the FAA's actions with respect to the Proposed Action are in conformance with the SIP.

- The emission estimates for the General Conformity Determination were prepared:
 - Using the latest planning assumptions.
 - Using the latest and most accurate emission estimation techniques.

- Based on the applicable air quality models, databases, and other requirements specified in the most recent version of the EPA's Guideline on Air Quality Models, including supplements.
- Based on the results of the evaluation, the total direct and indirect project-related emissions of NO_x were determined to be:
 - Accounted for in the excess creditable RFP emissions reductions available after meeting the milestone-year emissions reduction targets for NO_x and VOC, establishing motor vehicle emissions budgets (MVEB) for transportation conformity (40 CFR §93.101), and after considering previously proposed federal actions that relied on the current applicable SIP revision to demonstrate conformity.

As stated in Section 5.2 of the EA that provides a detailed evaluation of the effect of the Proposed Action on air quality, this General Conformity Determination is being published concurrently with EA documentation. While the EA and the General Conformity Determination are evaluating the same Proposed Action, these documents are being prepared to satisfy the requirements of NEPA and the CAA, respectively. The conformity status of a federal action automatically lapses after a period of 5 years (from the date a Final General Conformity Determination is reported) unless the federal action has been completed or a continuous program has been commenced to implement the federal action within a reasonable time. Additionally, if, after the Final General Conformity Determination is made, the federal action is changed so that there is an increase in the total direct and indirect project-related emissions, above the *de minimis* levels, a new General Conformity Determination would be required.

In a letter to FAA, dated, 06 December 2023, TCEQ issued a written determination stating that the emissions from the proposed action, together with all other emissions in the nonattainment or maintenance area would not exceed the emissions budget in the SIP.

6. Public and Agency Participation

The General Conformity Regulation (40 CFR Part 93.156) has a requirement for public participation that is similar to the NEPA process. Section 93.156 (b) states:

A federal agency must make public its draft conformity determination under Sec. 93.158 by placing a notice by prominent advertisement in a daily newspaper of general circulation in the area affected by the action and by providing 30 days for written public comment prior to taking any formal action on the draft determination. This comment period may be concurrent with any other public involvement, such as occurs in the NEPA process.

Section 93.155 (Reporting Requirements) states:

(a) A federal agency making a conformity determination under Sec. 93.158 must provide to the appropriate EPA Regional Office(s), State and local air quality agencies and, where applicable, affected Federal land managers, the agency designated under section 174 of the Act and the MPO a 30-day notice which describes the proposed action and the federal agency's draft conformity determination on the action.

(b) A Federal agency must notify the appropriate EPA Regional Office(s), State and local air quality agencies and, where applicable, affected federal land managers, the agency

designated under Section 174 of the Clean Air Act and the MPO within 30 days after making a final conformity determination under Sec. 93.158.

To meet these requirements, the Draft General Conformity Determination was included in the Draft EA, Appendix G. A public notice of its availability was published in the following local publications, Dallas Morning News, Fort Worth Star Telegram, Fort Worth Report (if they publish notices), and Al Día, along with the notice of the availability of the Draft EA. That notification began the public review and comment period. In addition, the Draft EA, with the Draft General Conformity Determination was sent to the EPA Region 6 Office, and TCEQ. The General Conformity Rules (40 CFR 93.155) require notifying federal land managers of Class I lands within 100 km of the determination. There are currently no federal Class I lands within 100 kilometers of the Proposed Action project area.

7. List of Preparers

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APPENDIX A: GENERAL CONFORMITY PROTOCOL

APPENDIX B: AIR QUALITY TECHNICAL REPORT

APPENDIX C: PUBLIC NOTICE

According to the requirements of the General Conformity Rule, federal agencies must make public their Draft General Conformity Determinations by placing a notice in a daily newspaper of general circulation in the area affected by the action, and by providing 30 days to obtain any written public comments prior to taking any formal action on the determinations. Additionally, all comments submitted on the Draft General Conformity Determination will be addressed and made available by the federal agency within 30 days of the agency's final conformity determination. As such, the Draft General Conformity Determination was published on December, 20, 2023 followed by a comment period, ending on February, 2, 2024.