

Exhibit KK: Response to 1.4.3-4
San Diego Air Pollution Control District Rule 1501 Response

Applicability of the General Conformity Rule, as adopted by the SDAPCD in Rule 1501 (Conformity of General Federal Actions) needs to be evaluated. Present the comparison of estimated emissions with the applicable de minimis thresholds.

The purpose of Rule 1501 is to ensure that federal agencies do not take or support actions that are inconsistent with the San Diego Air Pollution Control District's (SDAPCD's) efforts to achieve the National Ambient Air Quality Standards (NAAQS) and that federal agencies do not fail to take advantage of opportunities to assist in the achievement of the NAAQS. A conformity determination is required for each pollutant where the total of direct and indirect emissions in a nonattainment or maintenance area caused by a federal action would equal or exceed the thresholds identified in Rule 1501.

As identified in Table 4.3-2: SDAPCD Attainment Status in Section 4.3 Air Quality in the Proponent's Environmental Assessment (PEA), the Pipeline Safety & Reliability Project (Proposed Project) area is currently designated as nonattainment for one standard—eight-hour ozone (O₃). As described in the SDAPCD's Eight-Hour Ozone Attainment Plan for San Diego County (May 2007), San Diego County's nonattainment status was further categorized by the United States Environmental Protection Agency as "Basic," a category of eight-hour O₃ nonattainment areas (NAAs) with one-hour O₃ design values that meet the former one-hour O₃ NAAQS.

Table 1: Rule 1501 Nonattainment Area O₃ Thresholds presents the thresholds for conformity for O₃ NAAs. Under Rule 1501, the SDAPCD's "Basic" categorization is treated as an "Other" NAA; therefore, a 100-ton-per-year threshold applies.¹

Table 1: Rule 1501 Nonattainment Area O₃ Thresholds

O ₃ (VOCs or NO _x) NAA Category	Threshold (tons per year)
Serious	50
Severe	25
Extreme	10
Other (outside an O ₃ transport region)	100
Marginal and Moderate (inside an O ₃ transport region) – VOC	50
Marginal and Moderate (inside an O ₃ transport region) – NO _x	100

Note: VOCs = volatile organic compounds, NO_x = nitrogen oxides

¹ Cormier, Nick. SDAPCD. Contracts and Planning Department. Personal communication with S. Lai, Insignia Environmental. January 19, 2016. 858-586-2798.

As described in the PEA, the California Emissions Estimator Model (CalEEMod) was used to simulate the anticipated emissions during construction and operation and maintenance using site-specific information to generate emission rates based on the Proposed Project’s anticipated size, schedule, land use, and construction methods, as described in Chapter 3 – Project Description. The CalEEMod input and output were provided in Attachment 4.3-A: CalEEMod Reports. As shown in Table 2: VOC and NO_x Construction Emissions, controlled construction emissions for VOCs and NO_x will be below the applicable 100-ton-per-year threshold; therefore, with the implementation of the Applicants’-proposed measures (APMs) from the PEA, the Proposed Project will conform to Rule 1501.

Table 2: VOC and NO_x Construction Emissions

Year	Uncontrolled Emissions (tons per year)		Controlled Emissions (tons per year)	
	VOCs	NO _x	VOCs	NO _x
<i>Proposed Project</i>				
2018	13.80	120.57	5.39	92.29
2019	0.52	4.52	0.23	3.82
Threshold	100	100	100	100
Exceeded?	No	Yes	No	No
<i>Proposed Project with Implementation of APM-PUS-01</i>				
2018	13.84	121.28	5.43	93.00
2019	0.52	4.54	0.23	3.85
Threshold	100	100	100	100
Exceeded?	No	Yes	No	No

Note: Emissions are summarized from Attachment 4.3-A: CalEEMod Reports of the PEA.

CalEEMod was also used to generate annual emissions from operation and maintenance activities. As shown in Table 3: VOC and NO_x Operation and Maintenance Emissions, these anticipated emissions will also be below the 100-ton-per-year threshold. As a result, the Proposed Project will conform to Rule 1501.

Table 3: VOC and NO_x Operation and Maintenance Emissions

Category	Emissions (tons per year)	
	VOCs	NO _x
Operational Emissions	0.13	1.32
Threshold	100	100
Exceeded?	No	No

Note: Emissions are summarized from Attachment 4.3-A: CalEEMod Reports of the PEA.

Emissions on Federal Lands

The portion of the Proposed Project that travels through federal lands accounts for 5.53 percent of the Proposed Project (i.e., 2.6 miles of the 47-mile route is within Marine Corps Air Station Miramar). Therefore, the annual VOC and NO_x emissions for the portion of the Proposed Project within federal lands is 5.53 percent of the totals presented in Table 2: VOC and NO_x Construction Emissions and Table 3: VOC and NO_x Operation and Maintenance Emissions.