
APPENDIX B

AIR QUALITY MEMORANDUM



MEMO

TO: Tom Kisela, City Manager, City of Orange
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FROM: Isha Shah, MSc, UltraSystems Environmental Inc.

DATE: Monday, November 27, 2023

PROJECT #: 7191

RE: Air Quality Screening Analysis for Hart Park Pickleball and Fitness Circuit Project, Orange, CA

The purpose of this memorandum is to evaluate whether the proposed project's emissions meet or exceed thresholds for conformity determinations under 40 CFR § 51.853. The U.S. Environmental Protection Agency deleted that section of the Code of Federal Regulations on July 6, 2010.¹ The equivalent regulation is now 40 CFR § 93.153(b)(1), which defines *de minimis* levels, that is, the minimum threshold for which a conformity determination must be performed, for various criteria pollutants in various areas [40 CFR 93.153(b)(1) and 40 CFR 93.153(b)(2)].

The Hart Park Pickleball and Fitness Circuit Project (proposed project) is approximately two acres and is located at the western edge of W.O. Hart Memorial Park (Hart Park). This community park spans 56 acres and is located directly to the south of the Old Towne Orange Historic District. Hart Park and the project site are located at 701 South Glassell Street in the City of Orange within Orange County. The proposed project would develop an underutilized part of Hart Park to provide City residents with additional recreational opportunities.

The proposed project would promote health, fitness, and community connections. It would have 10 pickleball courts with fencing and windscreens, shade bails, benches, and outdoor exercise.

The project is in the Orange County portion (SRA 17) of the South Coast Air Basin (SCAB), for whose air pollution control the South Coast Air Quality Management District (SCAQMD) is substantially responsible. **Table 1** shows the attainment status of the SCAB for each criteria pollutant for the National Ambient Air Quality Standards (NAAQS).

Construction is anticipated to begin in April 2024 to the end of December 2024. Annual emissions of non-attainment and maintenance criteria pollutants and/or their precursors were calculated using

1 U.S. Environmental Protection Agency. Revisions to the General Conformity Regulations. 75 Federal Register 17253-17279, p. 17256. April 5, 2010. Accessed online at <https://www.govinfo.gov/content/pkg/FR-2010-04-05/pdf/2010-7047.pdf>, on November 6, 2023.

the **California Emissions Estimator Model** (CalEEMod), Version 2022.1.1.20² As shown in **Table 2**, annual construction and operational emissions are estimated to be below *de minimis* thresholds for all pertinent National Ambient Air Quality Standards (NAAQS).

Table 1
FEDERAL ATTAINMENT STATUS

Pollutants	Federal Classification³⁴
Ozone (O ₃)	Nonattainment (Extreme)
Particulate Matter (PM ₁₀)	Maintenance (Serious)
Fine Particulate Matter (PM _{2.5})	Nonattainment (Serious)
Carbon Monoxide (CO)	Maintenance (Serious)
Nitrogen Dioxide (NO ₂)	Maintenance (Primary)
Sulfur Dioxide (SO ₂)	Unclassified/Attainment

2 California Emissions Estimator Model User's Guide, Version 2022.1.1.20. Accessed online at www.caleemod.com, on November 20, 2023.

3 ARB, 2022. Maps of State and Federal Area Designations. Accessed online at <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>, on November 2, 2023

4 USEPA, 2022. Nonattainment Areas for Criteria Pollutants (Green Book). Accessed online at <https://www.epa.gov/green-book>, on November 2, 2023

Table 2
USEPA DE MINIMIS TABLE COMPARISON

Pollutants	Federal Classification	Construction Emissions (tons/year)	Operational Emissions (tons/year)	USEPA De Minimis Values (tons/year)
ROG (VOC)	Ozone Nonattainment (Extreme)	0.12	0.01	10
Particulate Matter (PM ₁₀)	Maintenance (Serious)	0.15	< 0.005	100
Fine Particulate Matter (PM _{2.5})	Nonattainment (Serious)	0.08	< 0.005	70
Carbon Monoxide (CO)	Maintenance (Serious)	1.13	0.01	100
Nitrogen Oxides (NO _x)	Ozone Nonattainment (Extreme)	1.04	< 0.005	100

Source: UltraSystems and USEPA *De Minimis* Table [40 CFR § 93.153(b)(1)].

CONCLUSION

It is clear that the annual construction and the operational emissions from the proposed project will be far below the EPA’s de minimis emission levels for each criteria pollutant. Therefore, a conformity determination is not required.