



Technical Memorandum

20 December 2022

To	John Whitney, P.E. – Town Supervisor Robert Westfall, P.E. – Town Engineer Town of Grand Island		
Copy to	Project File 12599152 – Town of Grand Island, NY		
From	GHD	Tel	716-213-3395
Subject	Review of Final Air Quality Analysis Report - Grand Island Commerce Center/Grand Island Distribution Project	Project no.	12599152 – Air Quality Analysis Review – Rev00

1. Introduction

This technical memorandum provides a summary of the peer review of the *Final Air Quality Analysis Report* for the Grand Island Commerce Center/Grand Island Distribution Project proposed for Grand Island, New York. The air quality analysis report (Project No. 31405369.000, dated September 2022) was prepared by WSP USA, Inc., Buffalo, New York office.

2. Comments

The peer review summary consists of a listing of comments indexed by section and page number within the air quality analysis report:

1. Section 2 / Page 1. The description of NAAQS does not acknowledge that all of New York State is part of the ozone transport region. Consider expanding discussion to address the ozone transport region and effect on air quality regulations.
2. Section 2 / Page 2. While NYSDEC’s current draft guidance for a CLCPA analysis does not apply to all air facility registration applications, this guidance does indicate that CLCPA analysis policy would apply to an air facility registration application where NYSDEC determines an analysis is necessary or appropriate to ensure CLCPA consistency. Further, the guidance states that NYSDEC may require an applicant to submit a CLCPA analysis regardless of the applicability if the facts surrounding the project indicate that an analysis is warranted.
3. Section 3 / Page 4. The analysis applies a control efficiency of 75 percent to fugitive dust emissions due to “watering and other measures”. The report should clarify if fugitive dust mitigation is to be specifically stipulated and monitored and if a fugitive dust plan will be required and/or prepared as part of the project.
4. Section 4 / Page 6. The report should clarify any confirmation with NYSDEC Region 9 Air Division regarding the anticipated air permitting for the project and any specific analysis requirements likely required by NYSDEC.
5. Section 5 / Page 6. The analysis states: “AERSCREEN was also used to evaluate emissions from the stationary sources at the warehouse, including natural gas combustion emissions from the HVAC system and emissions from the diesel engine attached to the emergency electrical

generator.” However, no air dispersion modeling of ambient impacts with AERSCREEN for these stationary sources is included in the air quality analysis report.

6. Section 5 / Page 6. Provide the rationale for selecting to use AERSCREEN screening-level to evaluate ambient air impacts from emissions from traffic travelling on roadways instead of dispersion models designed to evaluate air quality impacts along roadways, such as CAL3QHC or CAL3QHCR.
7. Section 5 / Page 6. Provide the rationale for only modeling a 50 meter section of the facility roadway instead of the entire length of the roadway. This rationale should provide some quantitative assessment that demonstrates the roadway sections beyond the 50-meter section including in the modeling would not have a significant contribution to the modeled impacts.
8. Appendix C. The AERSCREEN output file for the 1-Hour AM Peak for Carbon Monoxide is not included.
9. Appendix C. The AERSCREEN output file for the 1-Hour AM Peak for PM2.5 is not included.
10. Appendix C. The AERSCREEN output file for the 1-Hour AM Peak for PM10 is not included.
11. Appendix C. The AERSCREEN output file for the 1-Hour PM Peak for PM10 indicates a maximum PM10 ambient impact of 30.15 ug/m³. However, Table 4 in Section 5 of the report indicates a maximum PM10 ambient impact of 30.7 ug/m³. Please explain this difference.

DRAFT