

Ross Patronsky

From: Ross Patronsky
Sent: Thursday, December 29, 2011 11:10 AM
To: 'Rinnan, Mark'
Cc: 'Rogers, Michael D.'
Subject: RE: CTA Red & Purple Construction Impacts

Mr. Rinnan:

Sorry for the delay in responding to your question, but it took a while to get something back from our federal partners. Ultimately, I received the following excerpts from the conformity section of the Code of Federal Regulations:

93.117 Criteria and procedures: Compliance with PM10 and PM2.5 control measures.

The FHWA/FTA project must comply with any PM10 and PM2.5 control measures in the applicable implementation plan. This criterion is satisfied if the project-level conformity determination contains a written commitment from the project sponsor to include in the final plans, specifications, and estimates for the project those control measures (for the purpose of limiting PM10 and PM2.5 emissions from the construction activities and/or normal use and operation associated with the project) that are contained in the applicable implementation plan. **I am unaware of any control measures in the state implementation plan for Illinois that apply here. However, Illinois EPA is the agency responsible for the SIP; I have copied Mike Rogers of IEPA on this email in case there is something that applies.**

93.122(f)

(f) PM 2.5 from construction-related fugitive dust. (1) For PM2.5 areas in which the implementation plan does not identify construction-related fugitive PM2.5 as a significant contributor to the nonattainment problem, the fugitive PM2.5 emissions associated with highway and transit project construction are not required to be considered in the regional emissions analysis. **As far as I know fugitive dust from construction is not identified as a significant contributor to nonattainment, but Mr. Rogers should be able to tell you for sure.**

93.123(c)(5)

(5) CO, PM10, and PM2.5 hot-spot analyses are not required to consider construction-related activities which cause temporary increases in emissions. Each site which is affected by construction-related activities shall be considered separately, using established "Guideline" methods. Temporary increases are defined as those which occur only during the construction phase and last five years or less at any individual site. **This one's pretty self-explanatory.**

To help interpret this, I've added the notes in red. I assume there is some FTA person who is providing federal oversight on this project. That person should be able to help if you need further information on this issue. That said, let me know if I can be of further help.

Ross Patronsky
Senior Planner
Chicago Metropolitan Agency for Planning
233 S Wacker Dr, Suite 800
Chicago, IL 60606
312-386-8796
rpatronsky@cmap.illinois.gov

From: Rinnan, Mark [mailto:Mark.Rinnan@jacobs.com]
Sent: Tuesday, November 22, 2011 4:36 PM

To: Ross Patronsky
Subject: CTA Red & Purple Construction Impacts

Good Afternoon Ross,

Thanks for offering to make inquiries as to thresholds of significance caused by construction related activities. I understand CMAP (as the MPO for Chicago) models air quality conformance for the region but generally is not involved in assessing the temporary impacts cause by construction activities. We are preparing a technical memorandum that addresses those impacts. We are looking for local, state, or federal thresholds of significance for construction related impacts such as noise and vibration, air quality, and water resource impacts. These thresholds will be used to identify potential adverse impacts.

You mentioned these thresholds might be been included in the EIS for the reconstruction of the Dan Ryan Expressway and that the FHWA (or others) may have that information. Please provide contact information for those individuals if available.

Thanks for your assistance in this matter.

Mark D. Rinnan, AICP
Project Manager

JACOBS

One North Franklin | Suite 500
Chicago, Illinois 60606
312.424.5419

Mark.Rinnan@jacobs.com

Click on [JACOBS WORLD](#) for an interactive site illustrating our services or find out more at <http://www.jacobs.com>

 **Consider the environment. Please don't print this e-mail unless you really need to.**

NOTICE - This communication may contain confidential and privileged information that is for the sole use of the intended recipient. Any viewing, copying or distribution of, or reliance on this message by unintended recipients is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.