



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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OFFICE OF THE
REGIONAL ADMINISTRATOR

September 25, 2008

Secretary of Energy and Environmental Affairs
Executive Office of Energy and Environmental Affairs
ATTN: MEPA Office, Anne Canaday
Ref: EEA No. 14137
100 Cambridge Street, Suite 900
Boston, MA 02114

Craig Leiner
Deputy Director, Surface Transportation
Massachusetts Port Authority
One Harborside Drive, Suite 200S
East Boston, MA 02128-2909

Re: Draft Environmental Impact Report/Environmental Assessment for the Southwest Service Area Redevelopment Program at Boston-Logan International Airport, East Boston, MA (EEA No. 14137)

Dear Ms. Canaday and Mr. Leiner:

We have completed our review of the Draft Environmental Impact Report/Environmental Assessment (DEIR/EA), EEA Number 14137, for "Southwest Service Area Redevelopment Program at Boston-Logan International Airport, East Boston, Massachusetts." From an air quality perspective, we support the consolidated car rental facility and commercial parking project.

We offer the following comments on the air quality analysis presented in the DEIR/EA for your consideration.

1. The EA does not address the Boston Area Carbon Monoxide (CO) Attainment Area which has a SIP-approved maintenance plan. As the proposed Southwest Service Area Redevelopment Program is located within a carbon monoxide attainment area with a maintenance plan, the proposed action must also comply with the Federal General Conformity Rule, "Subpart B--Determining Conformity of General Federal Actions to State or Federal Implementation Plans," (40 CFR 93.150 – 93.160) for carbon monoxide.

A general conformity determination is required for carbon monoxide where the total of direct and indirect emissions of carbon monoxide within a maintenance area caused by a Federal action would equal or exceed the de minimis level of 100 tons per year of carbon

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monoxide (40 CFR 93.153(b)(2)). The first step is to prepare a mesoscale air quality analysis to determine if the direct and indirect carbon monoxide emissions from the project fall below the de minimis level. If the project emissions fall below the de minimis level, the project is assumed to conform to the state implementation plan. However, if the project equals or exceeds the de minimis level, a formal general conformity determination is required.

2. We note that the general conformity de minimis levels for the Eastern Massachusetts 8-hour ozone nonattainment area which is within an ozone transport region (applicable to Logan Airport) are 50 tons per year for volatile organic compounds (VOC) and 100 tons per year for nitrogen oxides (NOx). The EA incorrectly identifies a more restrictive de minimis level of 50 tons per year for each VOC and NOx. The EA demonstrates that the Phase 1 Build (2012), Phase 2 Build (2017) and construction years (2009 through 2017) VOC and NOx emissions do not come close to triggering general conformity for ozone.

Thank you for the opportunity to comment on the DEIR/EA. Please contact Timothy Timmermann of EPA's Office of Environmental Review at 617-918-1025 with any questions regarding this letter.

Sincerely,



Elizabeth A. Higgins, Director
Office of Environmental Review

cc:

John Silva
U.S. Department of Transportation
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