



**Oleander & Santa Ana Avenue
Warehouse
MOBILE SOURCE HEALTH RISK ASSESSMENT
CITY OF FONTANA**

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LIST OF ABBREVIATED TERMS

(1)	Reference
µg	Microgram
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
APS	Auxiliary Power System
AQMD	Air Quality Management District
ARB	Air Resources Board
CEQA	California Environmental Quality Act
CPF	Cancer Potency Factor
DPM	Diesel Particulate Matter
EMFAC	Emission Factor Model
EPA	Environmental Protection Agency
HHD	Heavy Heavy-Duty
HI	Hazard Index
HRA	Health Risk Assessment
LHD	Light Heavy-Duty
MATES	Multiple Air Toxics Exposure Study
MEIR	Maximally Exposed Individual Receptor
MEIW	Maximally Exposed Individual Worker
MHD	Medium Heavy-Duty
NAD	North American Datum
OEHHA	Office of Environmental Health Hazard Assessment
PM10	Particulate Matter 10 microns in diameter or less
Project	Oleander & Santa Ana Avenue Warehouse
REL	Reference Exposure Level
RM	Recommended Measures
SCAQMD	South Coast Air Quality Management District
SRA	Source Receptor Area
TAC	Toxic Air Contaminant
TA	Traffic Analysis
URF	Unit Risk Factor
UTM	Universal Transverse Mercator
VMT	Vehicle Miles Traveled

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EXECUTIVE SUMMARY

This report evaluates the potential health risk impacts to sensitive receptors (which are residents) and adjacent workers associated with the development of the Project, more specifically, health risk impacts as a result of exposure to Toxic Air Contaminants (TACs) including diesel particulate matter (DPM) as a result of heavy-duty diesel trucks accessing the site. This section summarizes the significance criteria and Project health risks.

The results of the health risk assessment from Project-generated DPM emissions are provided in Table ES-1, ES-2, and ES-3 below for the Project.

CONSTRUCTION IMPACTS

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R7 which is located approximately 740 feet east of the Project site at an existing residence located at 10788 Mint Leaf Way. R7 is placed in the private outdoor living areas (backyard) facing the Project site. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.24 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. The modeled receptors are illustrated on Exhibit 2-D.

OPERATIONAL IMPACTS

Residential Exposure Scenario:

The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R1 which is located approximately 239 feet northwest of the Project site at an existing residence located at 16079 Tyrol Drive. R1 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 1.19 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences. The modeled receptors are illustrated on Exhibit 2-D.

Worker Exposure Scenario¹:

The worker receptor land use with the greatest potential exposure to Project operational -source DPM emissions is Location R4, which represents the adjacent potential worker receptor to the north of the Project site. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.26 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers. The modeled receptors are illustrated on Exhibit 2-D.

School Child Exposure Scenario:

The nearest schools are Fontana Adult School, Citrus High School, and Jurupa Hills High School, located approximately 13, 330, and 332 feet north of the Project site, respectively. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.50 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to nearby school children.

CONSTRUCTION AND OPERATIONAL IMPACTS

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is Location R1. At the MEIR, the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 1.68 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location. The modeled receptors are illustrated on Exhibit 2-D.

1 SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

TABLE ES-1: SUMMARY OF CONSTRUCTION CANCER AND NON-CANCER RISKS

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
1.46 Year Exposure	Maximum Exposed Sensitive Receptor	1.24	10	NO
Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

TABLE ES-2: SUMMARY OF OPERATIONAL CANCER AND NON-CANCER RISKS

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.19	10	NO
25 Year Exposure	Maximum Exposed Worker Receptor	0.26	10	NO
9 Year Exposure	Maximum Exposed Individual School Child	0.50	10	NO
Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO
Annual Average	Maximum Exposed Worker Receptor	≤0.01	1.0	NO
Annual Average	Maximum Exposed Individual School Child	≤0.01	1.0	NO

TABLE ES-3: SUMMARY OF CONSTRUCTION AND OPERATIONAL CANCER AND NON-CANCER RISKS

Time Period	Location	Maximum Lifetime Cancer Risk (Risk per Million)	Significance Threshold (Risk per Million)	Exceeds Significance Threshold
30 Year Exposure	Maximum Exposed Sensitive Receptor	1.68	10	NO
Time Period	Location	Maximum Hazard Index	Significance Threshold	Exceeds Significance Threshold
Annual Average	Maximum Exposed Sensitive Receptor	≤0.01	1.0	NO

1 INTRODUCTION

The South Coast Air Quality Management District (SCAQMD) typically issues a comment letter on the Notice of Preparation of a CEQA Document. Per the SCAQMD's typical comment letter, if a proposed Project is expected to generate/attract diesel trucks, which emit diesel particulate matter (DPM) or other Toxic Air Contaminants (TACs), preparation of a HRA is necessary. This document serves to meet the SCAQMD's request for preparation of a HRA. This HRA has been prepared in accordance with the document Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (1) and is comprised of all relevant and appropriate procedures presented by the United States Environmental Protection Agency (U.S. EPA), California EPA and SCAQMD. Cancer risk is expressed in terms of expected incremental incidence per million population. The SCAQMD has established an incidence rate of ten (10) persons per million as the maximum acceptable incremental cancer risk due to TAC exposure from a project such as the proposed Project. This threshold serves to determine whether or not a given project has a potentially significant development-specific and cumulatively considerable impact.

The AQMD has published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2)*. In this report the AQMD states (Page D-3):

"...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is $HI > 1.0$ while the cumulative (facility-wide) is $HI > 3.0$. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."

The SCAQMD has also established non-carcinogenic risk parameters for use in HRAs. Non-carcinogenic risks are quantified by calculating a "hazard index," expressed as the ratio between the ambient pollutant concentration and its toxicity or Reference Exposure Level (REL). A REL is a concentration at or below which health effects are not likely to occur. A hazard index less than one (1.0) means that adverse health effects are not expected. In this HRA, non-carcinogenic exposures of less than 1.0 are considered less-than-significant. Both the cancer risk and non-carcinogenic risk thresholds are applied to the nearest sensitive receptors below.

1.1 SITE LOCATION

The proposed project is located north of Santa Ana Avenue and on either side of Oleander Avenue as well as the northeast corner of Citrus Avenue at Santa Ana Avenue in the City of Fontana as shown on Exhibit 1-A.

1.2 PROJECT DESCRIPTION

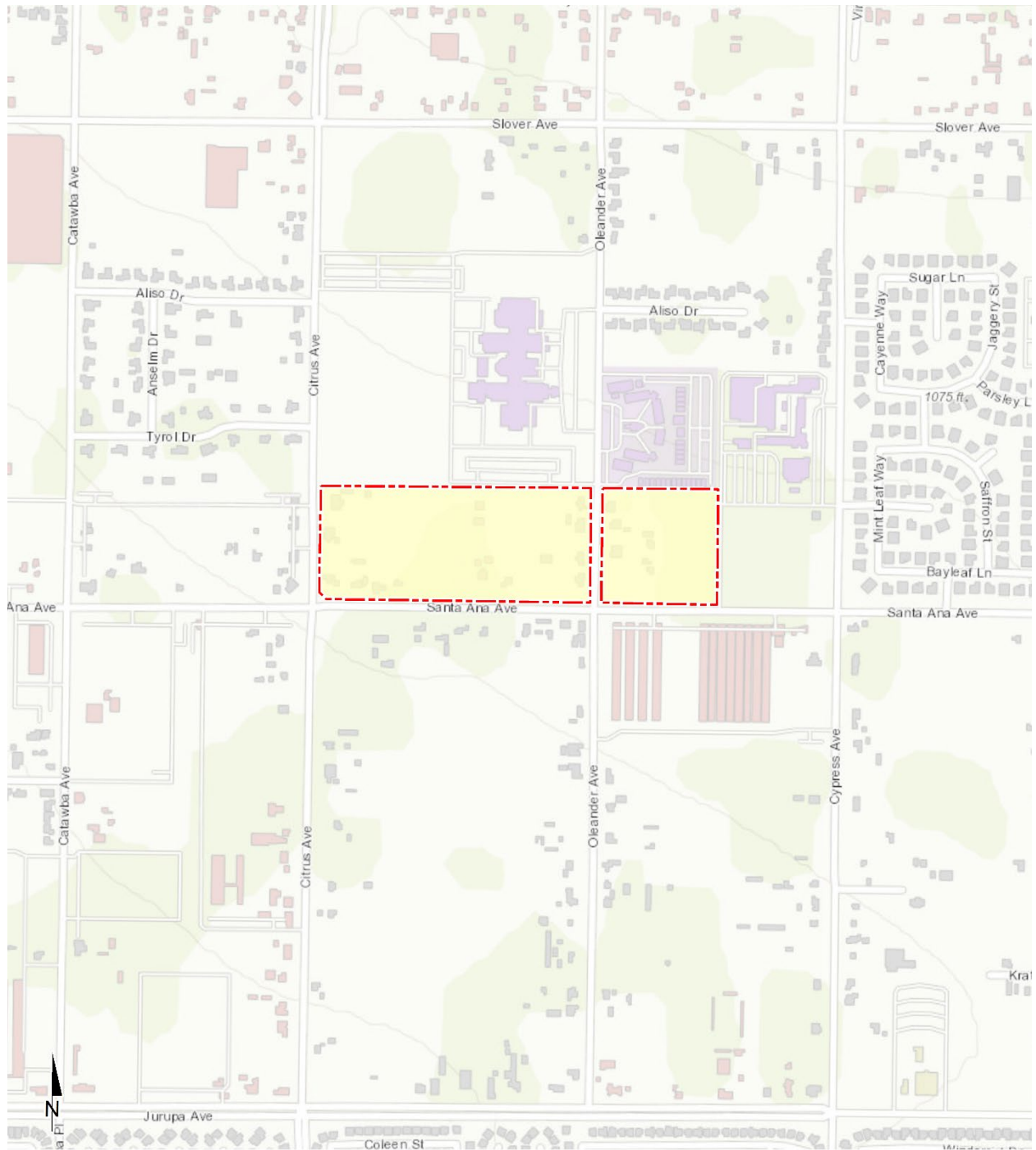
The proposed Project is to consist of the development of 540,849 square feet of warehouse use between 3 warehouse buildings:

- Warehouse building 1: 151,618 square feet
- Warehouse building 2: 196,336 square feet
- Warehouse building 3: 192,895 square feet

The Project is anticipated to be constructed by the year 2025. The preliminary site plan for the proposed Project is shown on Exhibit 1-B.

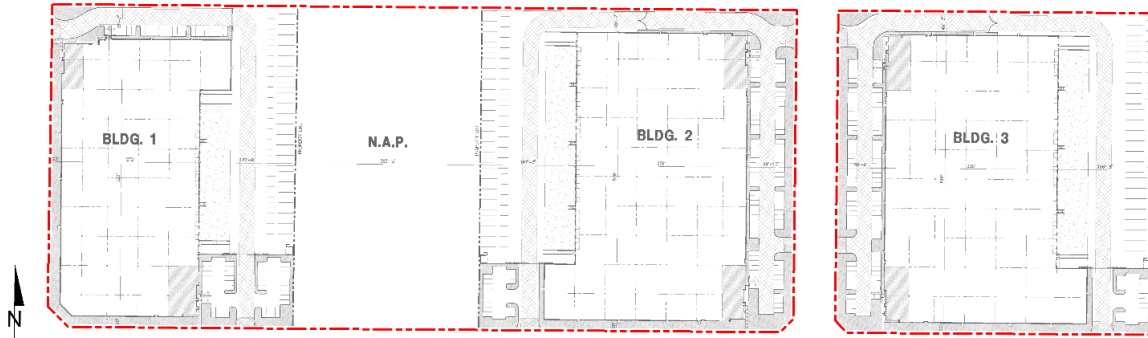
Per the *Oleander & Santa Ana Avenue Warehouse Traffic Analysis* prepared by Urban Crossroads, Inc., the proposed Project expected to generate approximately 928 total trips per day (464 vehicles inbound + 464 vehicles outbound) which includes 600 passenger car trips per day (300 passenger cars inbound + 300 passenger cars outbound) and 328 truck trips per day (164 trucks inbound + 164 trucks outbound) (3).

EXHIBIT 1-A: LOCATION MAP



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS

EXHIBIT 1-B: SITE PLAN



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2 BACKGROUND

2.1 BACKGROUND ON RECOMMENDED METHODOLOGY

This HRA is based on applicable guidelines to produce conservative estimates of human health risk posed by exposure to DPM. The conservative nature of this analysis is due primarily to the following factors:

- The ARB-adopted diesel exhaust Unit Risk Factor (URF) of 300 in one million per $\mu\text{g}/\text{m}^3$ is based upon the upper 95 percentile of estimated risk for each of the epidemiological studies utilized to develop the URF. Using the 95th percentile URF represents a very conservative (health-protective) risk posed by DPM because it represents breathing rates that are high for the human body (95% higher than the average population).
- The emissions derived assume that every truck accessing the Project site will idle for 15 minutes under the unmitigated scenario, and this is an overestimation of actual idling times and thus conservative.² The California Air Resources Board (CARB's) anti-idling requirements impose a 5-minute maximum idling time and therefore the analysis conservatively overestimates DPM emissions from idling by a factor of 3.

2.2 CONSTRUCTION HEALTH RISK ASSESSMENT

2.2.1 EMISSIONS CALCULATIONS

The emissions calculations for the construction HRA component are based on an assumed mix of construction equipment and hauling activity as presented in the *Oleander & Santa Ana Avenue Warehouse Air Quality Impact Analysis* ("technical study") prepared by Urban Crossroads, Inc. (4)

Construction related DPM emissions are expected to occur primarily as a function of heavy-duty construction equipment that would be operating on-site.

As discussed in the technical study, the Project would result in approximately 381 total working-days of construction activity. The construction duration by phase is shown on Table 2-1. A detailed summary of construction equipment assumptions by phase is provided at Table 2-2. The CalEEMod emissions outputs are presented in Appendix 2.1. The modeled emission sources for construction activity are illustrated on Exhibit 2-A.

² Although the Project is required to comply with ARB's idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions should be estimated for 15 minutes of truck idling (personal communication, in person, with Jillian Wong, December 22, 2016), which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc.

TABLE 2-1: CONSTRUCTION DURATION

Construction Activity	Start Date	End Date	Days
Demolition	1/1/2024	1/29/2024	20
Site Preparation	1/30/2024	3/11/2024	30
Grading	3/12/2024	4/22/2024	30
Building Construction	4/23/2024	6/16/2025	300
Paving	2/11/2025	6/16/2025	90
Architectural Coating	3/25/2025	6/16/2025	60

TABLE 2-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Construction Activity	Equipment	Amount	Hours Per Day
Demolition	Concrete/Industrial Saws	1	8
	Excavators	3	8
	Rubber Tired Dozers	2	8
Site Preparation	Rubber Tired Dozers	3	8
	Crawler Tractors	4	8
Grading	Excavators	2	8
	Graders	1	8
	Rubber Tired Dozers	1	8
	Scrapers	2	8
	Crawler Tractors	2	8
Building Construction	Cranes	1	8
	Forklifts	6	8
	Generator Sets	2	8
	Tractors/Loaders/Backhoes	6	8
	Welders	2	8
Paving	Pavers	2	8
	Paving Equipment	2	8
	Rollers	2	8
Architectural Coating	Air Compressors	1	8

EXHIBIT 2-A: MODELED CONSTRUCTION EMISSION SOURCES



LEGEND:
N
[Red hatched box] Construction Activity

2.3 OPERATIONAL HEALTH RISK ASSESSMENT

2.3.1 ON-SITE AND OFF-SITE TRUCK ACTIVITY

Vehicle DPM emissions were calculated using emission factors for particulate matter less than 10 μ m in diameter (PM₁₀) generated with the 2021 version of the Emission FACTor model (EMFAC) developed by the CARB. EMFAC 2021 is a mathematical model that CARB developed to calculate emission rates from motor vehicles that operate on highways, freeways, and local roads in California and is commonly used by the ARB to project changes in future emissions from on-road mobile sources (5). The most recent version of this model, EMFAC 2021, incorporates regional motor vehicle data, information and estimates regarding the distribution of vehicle miles traveled (VMT) by speed, and number of starts per day.

Several distinct emission processes are included in EMFAC 2021. Emission factors calculated using EMFAC 2021 are expressed in units of grams per vehicle miles traveled (g/VMT) or grams per idle-hour (g/idle-hr), depending on the emission process. The emission processes and corresponding emission factor units associated with diesel particulate exhaust for this Project are presented below.

For this Project, annual average PM₁₀ emission factors were generated by running EMFAC 2021 in EMFAC Mode for vehicles in the San Bernardino County jurisdiction. The EMFAC Mode generates emission factors in terms of grams of pollutant emitted per vehicle activity and can calculate a matrix of emission factors at specific values of temperature, relative humidity, and vehicle speed. The model was run for speeds traveled in the vicinity of the Project. The vehicle travel speeds for each segment modeled are summarized below.

- Idling – on-site loading/unloading and truck gate
- 5 miles per hour – on-site vehicle movement including driving and maneuvering
- 25 miles per hour – off-site vehicle movement including driving and maneuvering.

Calculated emission factors are shown at Table 2-3. As a conservative measure, a 2025 EMFAC 2021 run was conducted and a static 2025 emissions factor data set was used for the entire duration of analysis herein (e.g., 30 years). Use of 2025 emission factors would overstate potential impacts since this approach assumes that emission factors remain “static” and do not change over time due to fleet turnover or cleaner technology with lower emissions that would be incorporated into vehicles after 2025. Additionally, based on EMFAC 2021, Light-Heavy-Duty Trucks are comprised of 51.8% diesel, Medium-Heavy-Duty Trucks are comprised of 91.5% diesel, and Heavy-Heavy-Duty Trucks are comprised of 85.1% diesel. Trucks fueled by diesel are accounted for by these percentages accordingly in the emissions factor generation. Appendix 2.2 includes additional details on the emissions estimates from EMFAC.

The vehicle DPM exhaust emissions were calculated for running exhaust emissions. The running exhaust emissions were calculated by applying the running exhaust PM₁₀ emission factor (g/VMT) from EMFAC over the total distance traveled. The following equation was used to estimate off-site emissions for each of the different vehicle classes comprising the mobile sources (6):

$$\text{Emissions}_{\text{SpeedA}} \text{ (g/s)} = \text{EF}_{\text{RunExhaust}} \text{ (g/VMT)} * \text{Distance (VMT/trip)} * \text{Number of Trips (trips/day)} / \text{seconds per day}$$

Where:

$\text{Emissions}_{\text{SpeedA}}$ (g/s): Vehicle emissions at a given speed A;

$\text{EF}_{\text{RunExhaust}}$ (g/VMT): EMFAC running exhaust PM₁₀ emission factor at speed A;

Distance (VMT/trip): Total distance traveled per trip.

Similar to off-site traffic, on-site vehicle running emissions were calculated by applying the running exhaust PM₁₀ emission factor (g/VMT) from EMFAC and the total vehicle trip number over the length of the driving path using the same formula presented above for on-site emissions. In addition, on-site vehicle idling exhaust emissions were calculated by applying the idle exhaust PM₁₀ emission factor (g/idle-hr) from EMFAC and the total truck trip over the total assumed idle time (15 minutes). The following equation was used to estimate the on-site vehicle idling emissions for each of the different vehicle classes (6):

$$\text{Emissions}_{\text{idle}} \text{ (g/s)} = \text{EF}_{\text{idle}} \text{ (g/hr)} * \text{Number of Trips (trips/day)} * \text{Idling Time (min/trip)} * 60 \text{ minutes per hour} / \text{seconds per day}$$

Where:

$\text{Emissions}_{\text{idle}}$ (g/s): Vehicle emissions during idling;

EF_{idle} (g/s): EMFAC idle exhaust PM₁₀ emission factor.

TABLE 2-3: 2025 WEIGHTED AVERAGE DPM EMISSIONS FACTORS

Speed	Weighted Average
0 (idling)	0.07797 (g/idle-hr)
5	0.01921 (g/s)
25	0.00812 (g/s)

Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Due to the large number of volume sources modeled for this analysis, the corresponding coordinates of each volume source have not been included in this report but are included in Appendix 2.3. The DPM emission rate for each volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment and dividing the result by the number of volume sources along that roadway, as illustrated on Table 2-4. The modeled emission sources are illustrated on Exhibit 2-B for on-site sources and Exhibit 2-C for off-site sources. The modeling domain is limited to the Project’s primary truck route and includes off-site sources in the study area for more than ¼ mile. This modeling domain is more inclusive and conservative than using only a ¼ mile modeling domain which is the distance supported by several reputable studies which conclude that the greatest potential risks occur within a ¼ mile of the primary source of emissions (7) (in the case of the Project, the primary source of emissions is the on-site idling and on-site travel).

EXHIBIT 2-B: MODELED ON-SITE EMISSION SOURCES

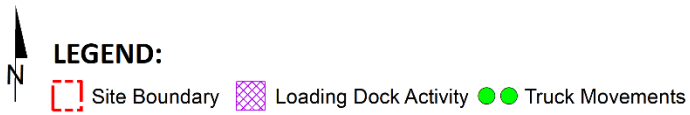
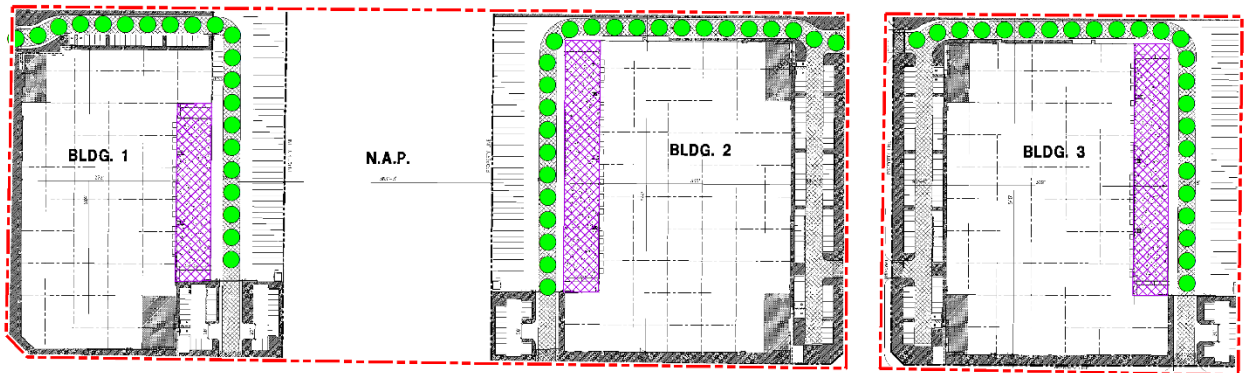


EXHIBIT 2-C: MODELED OFF-SITE EMISSION SOURCES

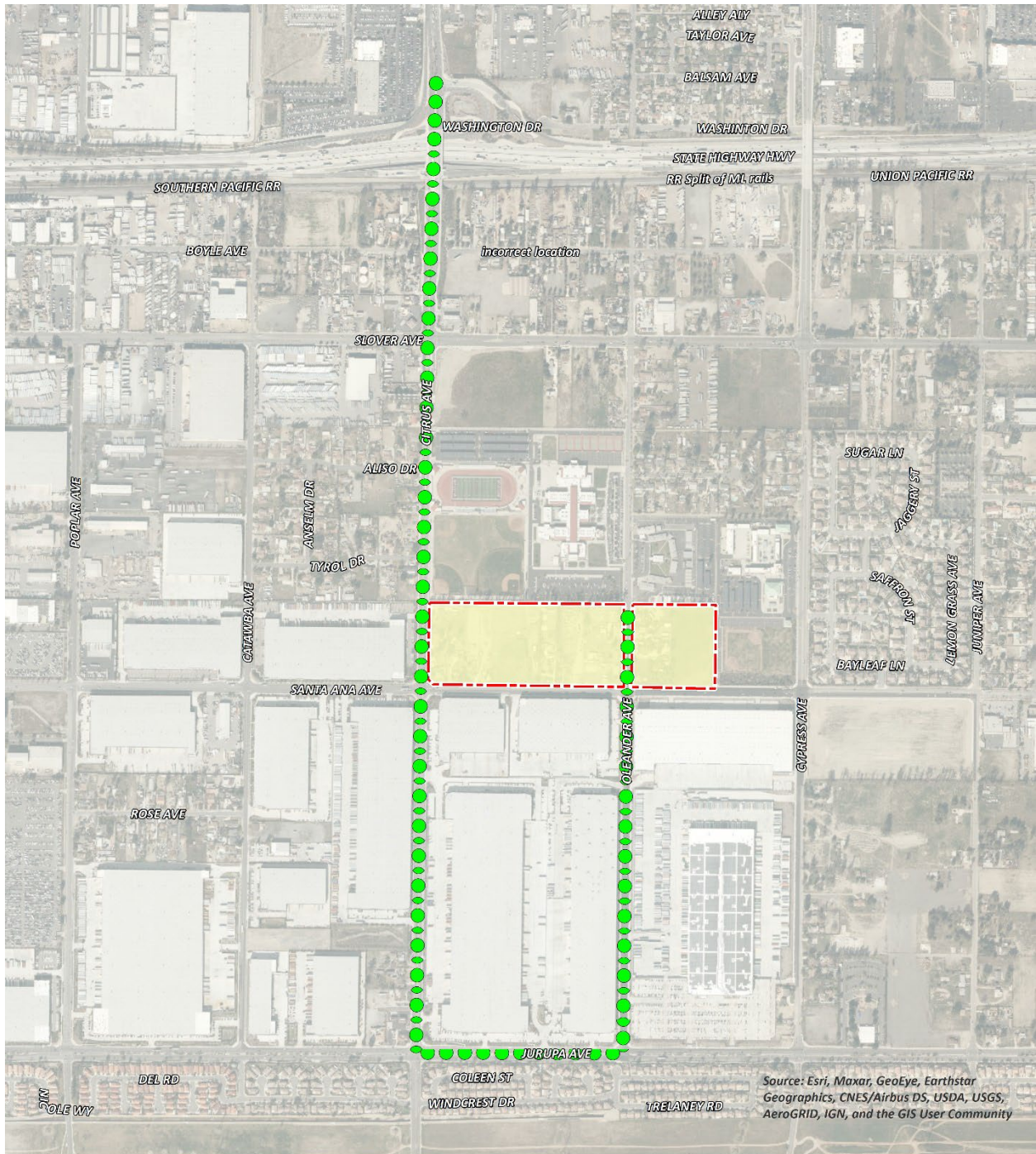


TABLE 2-4: DPM EMISSIONS FROM PROJECT TRUCKS (2025 ANALYSIS YEAR)

Truck Emission Rates						
Source	Trucks Per Day	VMT ^a (miles/day)	Truck Emission Rate ^b (grams/mile)	Truck Emission Rate ^b (grams/idle-hour)	Daily Truck Emissions ^c (grams/day)	Modeled Emission Rates (g/second)
On-Site Idling - Bldg 1	47			0.0780	0.92	1.060E-05
On-Site Idling - Bldg 2	59			0.0780	1.15	1.331E-05
On-Site Idling - Bldg 3	58			0.0780	1.13	1.309E-05
On-Site Travel - Bldg 1	94	14.84	0.0192		0.28	3.298E-06
On-Site Travel - Bldg 2	118	21.86	0.0192		0.42	4.859E-06
On-Site Travel - Bldg 3	116	21.23	0.0192		0.41	4.721E-06
Off-Site Travel - Oleander Avenue 72% Inbound/Outbound	234	148.19	0.0081		1.20	1.393E-05
Off-Site Travel - Jurupa/Citrus Avenue 72% Inbound/Outbound	234	217.78	0.0081		1.77	2.047E-05
Off-Site Travel - Citrus Avenue 100% Inbound/Outbound	328	247.26	0.0081		2.01	2.324E-05

^a Vehicle miles traveled are for modeled truck route only.

^b Emission rates determined using EMFAC 2021. Idle emission rates are expressed in grams per idle hour rather than grams per mile.

^c This column includes the total truck travel and truck idle emissions. For idle emissions this column includes emissions based on the assumption that each truck idles for 15 minutes.

On-site truck idling was estimated to occur as trucks enter and travel through the Project site. Although the Project’s diesel-fueled truck and equipment operators will be required by State law to comply with CARB’s idling limit of 5 minutes, staff at SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling (8), which would take into account on-site idling which occurs while the trucks are waiting to pull up to the truck bays, idling at the bays, idling at check-in and check-out, etc. As such, this analysis calculates truck idling at 15 minutes, consistent with SCAQMD’s recommendation.

As summarized in the *Oleander & Santa Ana Avenue Warehouse Traffic Analysis* prepared by Urban Crossroads, Inc., the Project is expected to generate a total of approximately 557 actual vehicular trips-ends per day (279 vehicles inbound + 279 vehicles outbound) which includes 469 passenger vehicle trips (235 passenger vehicles inbound + 235 passenger vehicles outbound) and 88 two-way truck trips (44 trucks inbound per day + 44 trucks outbound) per day (3).

2.4 EXPOSURE QUANTIFICATION

The analysis herein has been conducted in accordance with the guidelines in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (1). The Environmental Protection Agency’s (U.S. EPA’s) AERMOD model has been utilized. For purposes of this analysis, the Lakes AERMOD View (Version 11.2.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View was utilized to incorporate the U.S. EPA’s latest AERMOD Version 22112 (9).

The model offers additional flexibility by allowing the user to assign an initial release height and vertical dispersion parameters for mobile sources representative of a roadway. For this HRA, the roadways were modeled as adjacent volume sources. Roadways were modeled using the U.S. EPA’s haul route methodology for modeling of on-site and off-site truck movement. More specifically, the Haul Road Volume Source Calculator in Lakes AERMOD View has been utilized to determine the release height parameters. Based on the US EPA methodology, the Project’s modeled sources would result in a release height of 3.49 meters and an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters.

Model parameters are presented in Table 2-5 (10). The model requires additional input parameters including emission data and local meteorology. Meteorological data from the SCAQMD’s Fontana monitoring station was used to represent local weather conditions and prevailing winds (11).

TABLE 2-5: AERMOD MODEL PARAMETERS

Dispersion Coefficient (Urban/Rural)	Urban (population 2,035,210)
Terrain (Flat/Elevated)	Elevated (Regulatory Default)
Averaging Time	1 year (5-year Meteorological Data Set)
Receptor Height	0 meters (Regulatory Default)

Universal Transverse Mercator (UTM) coordinates for World Geodetic System (WGS) 84 were used to locate the Project site boundaries, each volume source location, and receptor locations in the Project vicinity. The AERMOD dispersion model summary output files for the Project are

presented in Appendix 2.3. Modeled sensitive receptors were placed at residential and non-residential locations.

Receptors may be placed at applicable structure locations for residential and worker property and not necessarily the boundaries of the properties containing these uses because the human receptors (residents and workers) spend a majority of their time at the residence or in the workplace’s building, and not on the property line. It should be noted that the primary purpose of receptor placement is focused on long-term exposure. For example, the HRA evaluates the potential health risks to residents and workers over a period of 30 or 25 years of exposure, respectively. Notwithstanding, as a conservative measure, receptors were placed at either the outdoor living area or the building façade, whichever is closer to the Project site.

For purposes of this HRA, receptors include both residential and non-residential (worker) land uses in the vicinity of the Project. These receptors are included in the HRA since residents and workers may be exposed at these locations over a long-term duration of 30 and 25 years, respectively. This methodology is consistent with SCAQMD and OEHHA recommended guidance.

Any impacts to residents or workers located further away from the Project site than the modeled residential and workers would have a lesser impact than what has already been disclosed in the HRA at the MEIR and MEIW because concentrations dissipate with distance.

All receptors were set to existing elevation height so that only ground-level concentrations are analyzed. United States Geological Survey (USGS) Digital Elevation Model (DEM) terrain data based on a 7.5-minute topographic quadrangle map series using AERMAP was utilized in the HRA modeling to set elevations (12).

Discrete variants for daily breathing rates, exposure frequency, and exposure duration were obtained from relevant distribution profiles presented in the 2015 OEHHA Guidelines. Tables 2-6 through 2-9 summarize the Exposure Parameters for Residents, Workers, and School Children based on 2015 OEHHA Guidelines. Appendix 2.4 includes the detailed risk calculation.

TABLE 2-6: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (CONSTRUCTION ACTIVITY)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
0 to 2	1,090	10	1.46	1.00	260	8

TABLE 2-7: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (30 YEAR RESIDENTIAL)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days/year)	Exposure Time (hours/day)
-0.25 to 0	361	10	0.25	0.85	350	24
0 to 2	1,090	10	2	0.85	350	24
2 to 16	572	3	14	0.72	350	24
16 to 30	261	1	14	0.73	350	24

TABLE 2-8: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (25 YEAR WORKER)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Exposure Frequency (days/year)	Exposure Time (hours/day)
16 to 41	230	1	25	250	12

TABLE 2-9: EXPOSURE ASSUMPTIONS FOR INDIVIDUAL CANCER RISK (9 YEAR SCHOOL CHILD)

Age	Daily Breathing Rate (L/kg-day)	Age Specific Factor	Exposure Duration (years)	Exposure Frequency (days/year) ^a	Exposure Time (hours/day)
4 to 13	631	3	9	180	12

^a To represent the unique characteristics of the school-based population, the assessment employed the U.S. Environmental Protection Agency's guidance to develop viable dose estimates based on reasonable maximum exposures (RME). RME's are defined as the "highest exposure that is reasonably expected to occur" for a given receptor population. As a result, lifetime risk values for the student population were adjusted to account for an exposure duration of 180 days per year for nine (9) years. The 9 year exposure duration is also consistent with OEHA Recommendations and consistent with the exposure duration utilized in school-based risk assessments for various schools within the Los Angeles County Unified School District (LAUSD) that have been accepted by the SCAQMD.

2.5 CARCINOGENIC CHEMICAL RISK

Excess cancer risks are estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to potential carcinogens over a specified exposure duration. The estimated risk is expressed as a unitless probability. The cancer risk attributed to a chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the chemical-specific cancer potency factor (CPF). A risk level of 10 in one million implies a likelihood that up to 10 people, out of one million equally exposed people would contract cancer if exposed continuously (24 hours per day) to the levels of toxic air contaminants over a specified duration of time.

Guidance from CARB and the California Environmental Protection Agency, Office of Environmental Health Hazard Assessment (OEHA) recommends a refinement to the standard

point estimate approach when alternate human body weights and breathing rates are utilized to assess risk for susceptible subpopulations such as children. For the inhalation pathway, the procedure requires the incorporation of several discrete variates to effectively quantify dose. Once determined, contaminant dose is multiplied by the cancer potency factor (CPF) in units of inverse dose expressed in milligrams per kilogram per day (mg/kg/day)⁻¹ to derive the cancer risk estimate. Therefore, to assess exposures, the following dose algorithm was utilized.

$$\text{DOSE}_{\text{air}} = (\text{C}_{\text{air}} \times [\text{BR}/\text{BW}] \times \text{A} \times \text{EF}) \times (1 \times 10^{-6})$$

Where:

DOSE _{air}	=	chronic daily intake (mg/kg/day)
C _{air}	=	concentration of contaminant in air (ug/m ³)
[BR/BW] BW-day)	=	daily breathing rate normalized to body weight (L/kg)
A	=	inhalation absorption factor
EF	=	exposure frequency (days/365 days)
BW	=	body weight (kg)
1 x 10 ⁻⁶	=	conversion factors (ug to mg, L to m ³)
RISK _{air}	=	DOSE _{air} x CPF x ED/AT

Where:

DOSE _{air}	=	chronic daily intake (mg/kg/day)
CPF	=	cancer potency factor
ED	=	number of years within particular age group
AT	=	averaging time

2.6 NON-CARCINOGENIC EXPOSURES

An evaluation of the potential noncarcinogenic effects of chronic exposures was also conducted. Adverse health effects are evaluated by comparing a compound's annual concentration with its toxicity factor or Reference Exposure Level (REL). The REL for diesel particulates was obtained from OEHHA for this analysis. The chronic reference exposure level (REL) for DPM was established by OEHHA as 5 µg/m³ (13).

The non-cancer hazard index was calculated as follows:

The relationship for the non-cancer health effects of DPM is given by the following equation:

$$\text{HI}_{\text{DPM}} = \text{C}_{\text{DPM}}/\text{REL}_{\text{DPM}}$$

Where:

- HI_{DPM} = Hazard Index; an expression of the potential for non-cancer health effects.
- C_{DPM} = Annual average DPM concentration ($\mu\text{g}/\text{m}^3$).
- REL_{DPM} = Reference exposure level (REL) for DPM; the DPM concentration at which no adverse health effects are anticipated.

For purposes of this analysis the hazard index for the respiratory endpoint totaled less than one for all receptors in the project vicinity, and thus is less than significant.

2.7 POTENTIAL PROJECT DPM-SOURCE CANCER AND NON-CANCER RISKS

CONSTRUCTION IMPACTS

The land use with the greatest potential exposure to Project construction-source DPM emissions is Location R7 which is located approximately 740 feet east of the Project site at an existing residence located at 10788 Mint Leaf Way. R7 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 1.24 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 , which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction activity. All other receptors during construction activity would experience less risk than what is identified for this location. The modeled receptors are illustrated on Exhibit 2-D.

OPERATIONAL IMPACTS

Residential Exposure Scenario:

The residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R1 which is located approximately 239 feet northwest of the Project site at an existing residence located at 16079 Tyrol Drive. R1 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 1.19 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01 , which would not exceed the applicable significance threshold of 1.0. Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Project site and primary truck route than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Project site would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Project will not cause a significant human health or cancer risk to nearby residences. The modeled receptors are illustrated on Exhibit 2-D.

Worker Exposure Scenario³:

The worker receptor land use with the greatest potential exposure to Project operational -source DPM emissions is Location R4, which represents the adjacent potential worker receptor to the north of the Project site. At the MEIW, the maximum incremental cancer risk impact is 0.26 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Project would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Project will not cause a significant human health or cancer risk to adjacent workers. The modeled receptors are illustrated on Exhibit 2-D.

School Child Exposure Scenario:

The nearest schools are Fontana Adult School, Citrus High School, and Jurupa Hills High School, located approximately 13, 330, and 332 feet north of the Project site, respectively. At the MEISC, the maximum incremental cancer risk impact attributable to the Project is calculated to be 0.50 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to nearby school children.

CONSTRUCTION AND OPERATIONAL IMPACTS

The land use with the greatest potential exposure to Project construction-source and operational-source DPM emissions is Location R1. At the MEIR, the maximum incremental cancer risk attributable to Project construction-source and operational-source DPM emissions is estimated at 1.68 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location. The modeled receptors are illustrated on Exhibit 2-D.

It should be noted that the receptors presented in Exhibit 2-D do not represent all modeled receptors.

3 SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act) / CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on-site.

EXHIBIT 2-D: RECEPTOR LOCATIONS



LEGEND:

-  Site Boundary
-  Receptor Locations
-  Distance from receptor to Project site boundary (in feet)

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3 REFERENCES

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4 CERTIFICATIONS

The contents of this health risk assessment represent an accurate depiction of the impacts to sensitive receptors associated with the proposed Oleander & Santa Ana Avenue Warehouse Project. The information contained in this health risk assessment report is based on the best available data at the time of preparation. If you have any questions, please contact me at (949) 660-1994.

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PROFESSIONAL AFFILIATIONS

AEP – Association of Environmental Planners
AWMA – Air and Waste Management Association
ASTM – American Society for Testing and Materials

PROFESSIONAL CERTIFICATIONS

Environmental Site Assessment – American Society for Testing and Materials • June 2013
Planned Communities and Urban Infill – Urban Land Institute • June 2011
Indoor Air Quality and Industrial Hygiene – EMSL Analytical • April 2008
Principles of Ambient Air Monitoring – California Air Resources Board • August 2007
AB2588 Regulatory Standards – Trinity Consultants • November 2006
Air Dispersion Modeling – Lakes Environmental • June 2006

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APPENDIX 2.1:
CALEEMOD OUTPUTS

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APPENDIX 2.2:
EMFAC EMISSIONS SUMMARY

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APPENDIX 2.3:
AERMOD MODEL INPUT/OUTPUT

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APPENDIX 2.4:
RISK CALCULATIONS

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