

# **ATTACHMENTS**



**California Emissions Estimator Model®**

# **User's Guide**

**Version 2013.2**

Prepared for:  
**California Air Pollution Control Officers Association (CAPCOA)**

Prepared by:  
**ENVIRON International Corporation and the California Air Districts**

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## Copyright

California Emission Estimator Model (CalEEMod)<sup>®</sup>  
Version 2013.2

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(CAPCOA)

Developed by ENVIRON International Corporation in collaboration with the California air districts



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# 1 Introduction

This User's Guide (Guide) to the California Emission Estimator Model (CalEEMod)<sup>®</sup> is meant to give the user an introduction on how to use the program as well as document the detailed calculations and default assumptions made in associated appendices. The purpose of CalEEMod is to provide a uniform platform for government agencies, land use planners, and environmental professionals to estimate potential emissions associated with both construction and operational use of land use projects. It is intended that these emission estimates are suitable for use in California Environmental Quality Act (CEQA) compliant documents for air quality and climate change impacts. In addition individual districts may develop additional uses for the model's emission estimates to show compliance with local agency rules.

CalEEMod utilizes widely accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available. These models and default estimates use sources such as the United States Environmental Protection Agency (USEPA) AP-42 emission factors, California Air Resources Board (ARB) vehicle emission models, studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. In addition, local air districts were given the opportunity to provide default values and existing regulation methodologies to use in their specific regions. If no information was provided by local air districts, appropriate state-wide values were utilized if regional differences could not otherwise be defined. Since new information and regulations are always changing, local agencies should be consulted to determine any recommended values to use that may differ from the defaults currently used in CalEEMod. User's of CalEEMod should keep in mind the assumptions and limitations of the default data in CalEEMod. A large majority of the default data associated with locations and land use is based on surveys of existing land uses. Caution should be taken if the project deviates significantly from the types and features included in the survey that forms the substantial evidence supporting the default data. In these situations site specific data that is supported by substantial evidence should be used if available.

The model provides a number of opportunities for the user to change the defaults in the model, however, users are recommended to provide justification for changing the defaults (e.g., reference more appropriate data) in the "Remarks" box provided at the bottom of the screen. Further, the user is reminded that CalEEMod is an emissions model and not an enforcement mechanism, thus, the user should ensure correct data is inputted, including the choice and percent reduction of mitigation most applicable to the land use project being evaluated.

## 1.1 Purpose of Model

CalEEMod provides a simple platform to calculate both construction emissions and operational emissions from a land use project. It calculates both the daily max and annual average for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions which can be used in support of analyses in CEQA documents such as Environmental Impact Reports (EIRs) and Negative Declarations. In addition, default values for water and energy use are quantified which may be useful for other sections in an EIR or represent opportunities to incorporate the

rigorous site-specific information from the other EIR sections. Specifically the model aids the user in the following calculations:

- Short term construction emissions associated with demolition, site preparation, grading, building, coating, and paving from the following sources
  - Off-road construction equipment
  - On-road mobile equipment associated with workers, vendors, and hauling
  - Fugitive dust associated with grading, demolition, truck loading, and roads (Fugitive dust from wind blown sources such as storage piles are not quantified in CalEEMod which is consistent with approaches taken in other comprehensive models.)
  - Volatile emissions of reactive organic gasses (ROG) from architectural coating (*including painting on parking lots*) and paving.
- Operational emissions associated with the fully built out land use development
  - On-road mobile vehicle traffic generated by the land uses
  - Fugitive dust associated with roads
  - Volatile emissions of ROG from architectural coating
  - Emissions from off-road equipment (e.g., forklifts, cranes) used during operation
  - Off-road emissions from landscaping equipment
  - Volatile emissions of ROG from consumer products and cleaning supplies
  - Wood stoves and hearth usage
  - Natural gas usage in the buildings
  - Electricity usage in the buildings (GHG only)
  - Electricity usage from lighting in parking lots and lighting, ventilation and elevators in parking structures
  - Water usage by the land uses (GHG only)
  - Solid waste disposal by the land uses (GHG only)
- One-time vegetation sequestration changes
  - Permanent vegetation land use changes
  - New tree plantings
- Mitigation impacts to both short-term construction and operational emissions
- Several of the mitigation measures described in CAPCOA's Quantifying Greenhouse Gas Mitigation Measures<sup>1</sup> have been incorporated into CalEEMod.

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<sup>1</sup> Available at : <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>



## 2 Program Installation

The program is distributed and maintained by the California Air Pollution Control Officers Association<sup>2</sup>. The most recent version can be downloaded from [www.caleemod.com](http://www.caleemod.com).

### 2.1 Operating System Requirements

CalEEMod was programmed by ENVIRON using Microsoft SQL Compact Edition in conjunction with a Visual Basic Graphical User Interface (GUI). CalEEMod requires the following system requirements:

- Microsoft Windows XP, Vista, or 7 Operating System
- Microsoft .Net Framework 4 or higher
- 90 Mb hard drive space available

### 2.2 Installation Procedures

#### To install

1. Be sure to uninstall any previous versions of CalEEMod before installing a new version as some file names will be the same potentially confusing the computer. To uninstall for most computers, under Settings, Control Panel. Programs and Features, highlight CalEEMod .msi and .exe files and then click 'uninstall.'
2. Ensure you have the required Microsoft .Net framework 4 or higher installed on your machine. If not install this first. It is available free from Microsoft at <http://www.microsoft.com/net/download.aspx>
3. Download the installation files (setup.exe and CalEEMod\_2013.2.msi).
4. Click the setup.exe file that you downloaded. This should walk you through the rest of the installation.
5. The default directory for CalEEMod is C:\CalEEMod\. The user may select alternative locations for installation<sup>3</sup>. The user will also be prompted to select to install CalEEMod for everyone who uses the computer or just the current user.
6. Click "Next" until the installation has completed. Then click close to exit the installer.
7. Click the link below to install SQL Server Compact 3.5 SP2

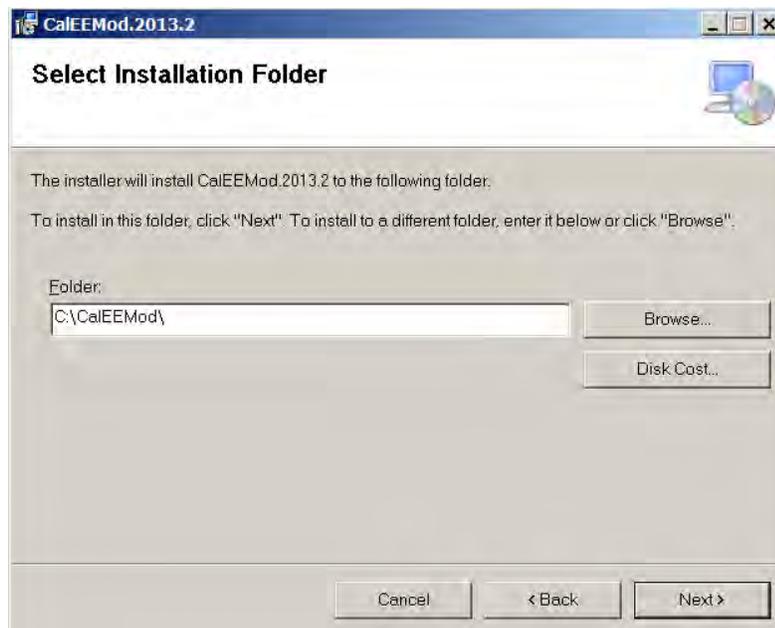
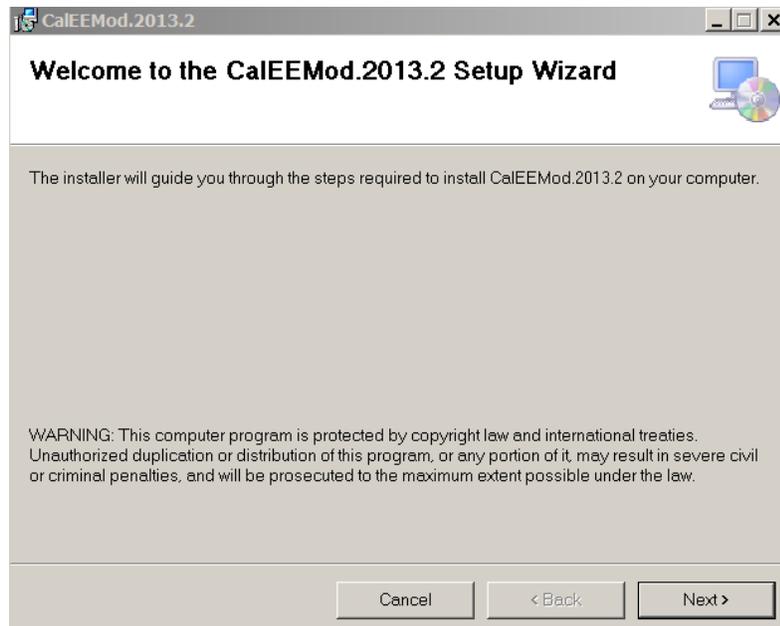
<http://www.microsoft.com/downloads/details.aspx?familyid=E497988A-C93A-404C-B161-3A0B323DCE24&displaylang=en>

<sup>2</sup> CalEEMod© 2012 All Rights Reserved by California Air Pollution Control Officers Association.

<sup>3</sup> If you use windows Vista or 7, please be aware of file privileges which may not allow access rights to some folders during program operations such as C:\Program Files\

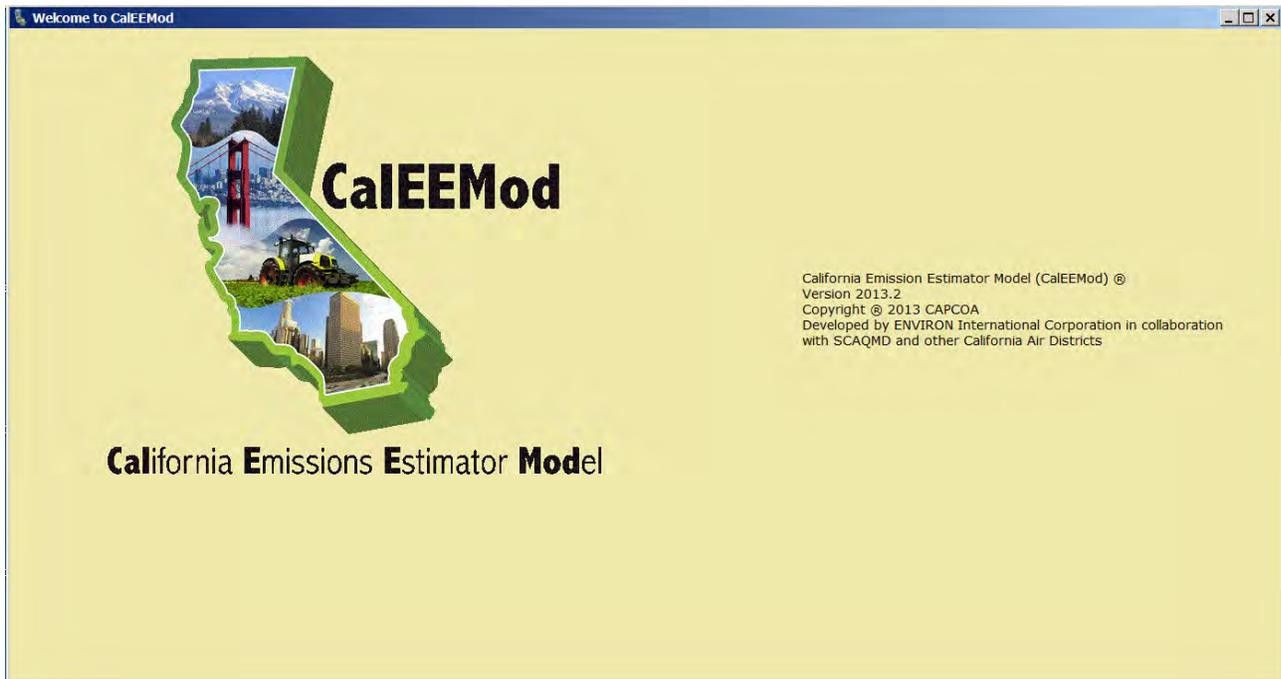
Once this file is downloaded, unzip the file anywhere on your computer and run the installation file (setup.exe). Be sure to follow the instructions on Microsoft's website and locate the appropriate .msi file. For 32-bit computers, one needs SSCERuntime\_x86-ENU.msi and on a 64-bit computer, install both the 32-bit and the 64-bit version of the SQL Server Compact 3.5 SP2 MSI files. Existing SQL Server Compact 3.5 applications may fail if only the 32-bit version of the MSI file is installed on the 64-bit computer.

8. If you have any further trouble installing CalEEMod, make sure you have appropriate user privileges and the system requirements.



## 2.3 Starting CalEEMod

The installation will create a short cut icon on the desktop as well as add CalEEMod to the Programs available from the Start Button. Select CalEEMod from the program files or double click on the CalEEMod short cut. This will open CalEEMod.



## 3 Using CalEEMod

CalEEMod is designed as a linear series of screens with an individual purpose such as project characteristics, construction schedule and equipment, operational activity, mitigation measures, etc. The user is expected to input basic information about the project such as location, land use type (e.g., residential, commercial, retail, etc.) and its size. The functionality of the model is to populate later screens with pre-determined defaults based on basic project and location information provided by the user. However, if more accurate information is known, the user has the ability to override the defaults provided.

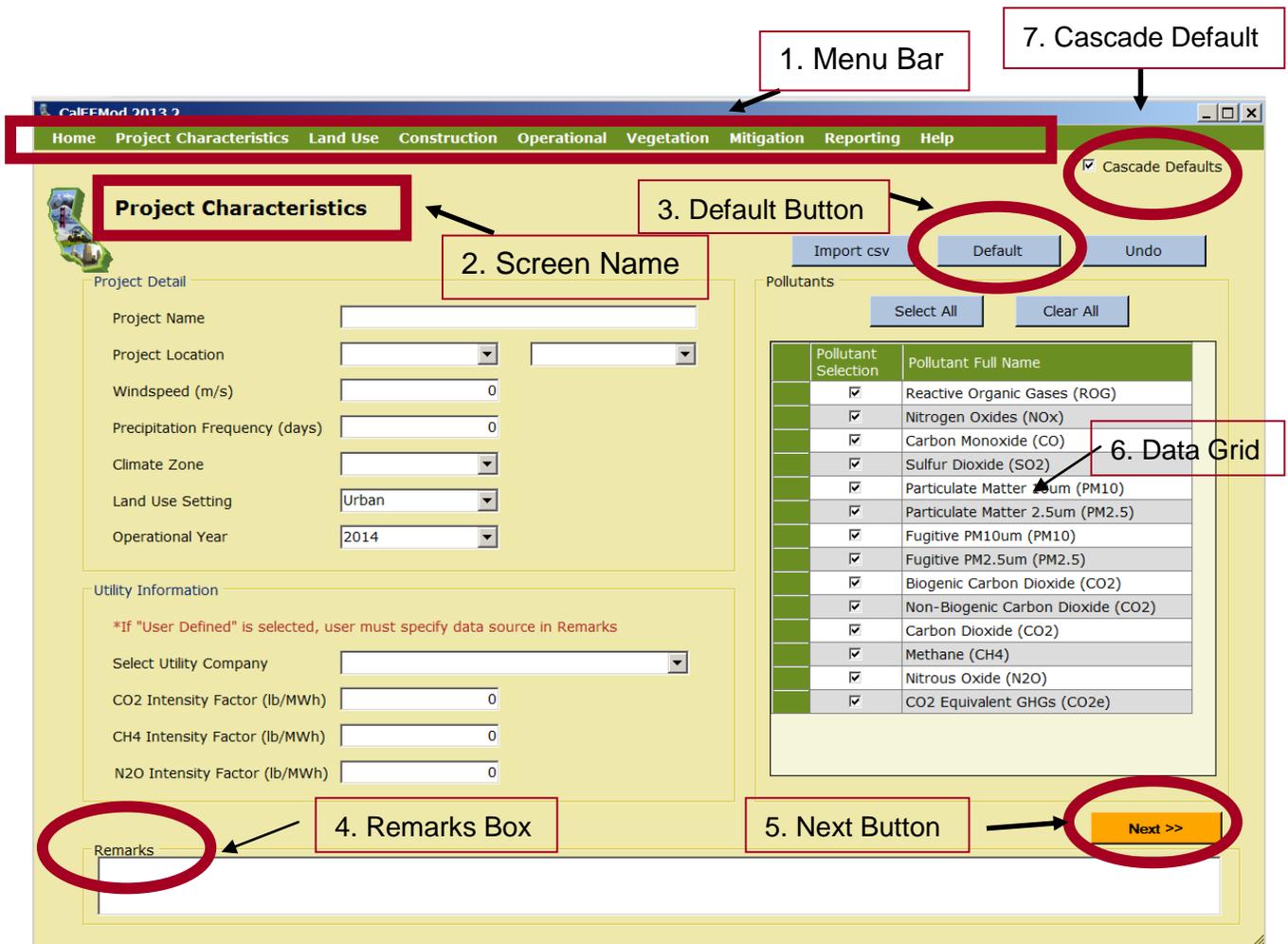
The figure on page 7 identifies some key features of CalEEMod which are described below.

1. **Menu Bar:** A drop down menu found on all screens. The “Home” menu controls file features such as New Project, Open Project, Save Project, and Save As Project. The “Help” will link to appropriate information for the relevant screen from this User’s Guide. All other menus will allow navigation between screens in any order.
2. **Screen Name:** Identifies the name of the current screen.

3. **Default Button:** This button allows the restoration of program defaults if the user has changed any values on the screen. User entered values will be highlighted yellow to clearly indicate that they have been changed from the defaults. The user will be prompted if they would like to restore default for the current or last cell or the whole page. "Import CSV" will allow a user to load in a csv file for a specific data grid. "Cancel" cancels the previous action.
4. **Remarks:** This section at the bottom of each screen allows the user to enter comments regarding any user defined values entered on this screen. This is meant to assist reviewers of the program in determining justification for values selected.
5. **Next Button:** This button when clicked will take the user to the next sequential step. Later modules will also have a "Previous" button that will take the user back to the previous sequential step.
6. **Data Grid:** This is a common box where values for the variables defined across the top to be filled in. The number of rows will automatically be adjusted based on the number of rows of information required to define the information. The last row is indicated with an asterisk (\*) and once information is started to be added to this row a new row will be added at the end. To delete a row select the desired row to delete, and hit the delete button on your keyboard (This is allowed unless the data grid is a fixed list such as the Pollutant selection list.). Scroll bars (both horizontal and vertical) will occur automatically if necessary.
7. **Cascade Default:** CalEEMod version 2013.2 introduces a new feature freezing the downloading of programmed defaults. Each input screen displays a box called "cascade default" automatically checked to populate defaults in future screens. However, if the "cascade default" box is unchecked, no defaults will be populated in subsequent screens. Unless all the necessary input parameters required for a proper analysis are known, it is recommended the user runs the model at least once with "cascade default" clicked on to allow the defaults to be populated. Then, if the user would like to change project parameters (e.g., number of dwelling units, building square footage, etc) without cascading new defaults in later screens, then uncheck the "cascade default" box when in the land use screen. This feature will prove useful for those users who override the defaults with specific project information (e.g., construction schedule, construction equipment, water use, energy use, etc.) and would like to evaluate different project scenarios with the same basic project information (i.e., land use type, location). If unchecking the "cascade default" box, the user should also be aware of the following:
  - *All* subsequent screens will freeze defaults
  - Changes to screens after land use (e.g., adding a new construction phase) will not cascade defaults relating to that change or add new tabs (e.g., trips and VMT, dust material movement) so any necessary input information will have to be added manual or impact will not be calculated
  - If changing or adding a land use type (e.g., from single family housing to a hospital), the future screens will not reflect the new land use type so some calculations (e.g., impacts from energy and water use) will not be properly performed

If a land use type is changed or added, it is recommended to click on the “cascade default” so the future screens can be populated with appropriate defaults and included in the analysis.

The next sections will give you some quick details on how to get started with a project in CalEEMod. Section 4 gives more specific details about each individual screen the user can encounter in CalEEMod.



The screenshot shows the CalEEMod 2013.2 software interface. The menu bar at the top includes Home, Project Characteristics, Land Use, Construction, Operational, Vegetation, Mitigation, Reporting, and Help. The 'Project Characteristics' screen is active, showing fields for Project Name, Project Location, Windspeed, Precipitation Frequency, Climate Zone, Land Use Setting (set to Urban), and Operational Year (set to 2014). Below these are Utility Information fields for CO2, CH4, and N2O Intensity Factors. A 'Remarks' box is at the bottom left. On the right, a 'Pollutants' table is displayed with a 'Default' button above it. A 'Next >>' button is at the bottom right. A 'Cascade Defaults' checkbox is checked in the top right corner.

Numbered callouts in the image identify the following features:

1. Menu Bar
2. Screen Name
3. Default Button
4. Remarks Box
5. Next Button
6. Data Grid
7. Cascade Default

Pollutant Selection	Pollutant Full Name
<input checked="" type="checkbox"/>	Reactive Organic Gases (ROG)
<input checked="" type="checkbox"/>	Nitrogen Oxides (NOx)
<input checked="" type="checkbox"/>	Carbon Monoxide (CO)
<input checked="" type="checkbox"/>	Sulfur Dioxide (SO2)
<input checked="" type="checkbox"/>	Particulate Matter 2.5um (PM10)
<input checked="" type="checkbox"/>	Particulate Matter 2.5um (PM2.5)
<input checked="" type="checkbox"/>	Fugitive PM10um (PM10)
<input checked="" type="checkbox"/>	Fugitive PM2.5um (PM2.5)
<input checked="" type="checkbox"/>	Biogenic Carbon Dioxide (CO2)
<input checked="" type="checkbox"/>	Non-Biogenic Carbon Dioxide (CO2)
<input checked="" type="checkbox"/>	Carbon Dioxide (CO2)
<input checked="" type="checkbox"/>	Methane (CH4)
<input checked="" type="checkbox"/>	Nitrous Oxide (N2O)
<input checked="" type="checkbox"/>	CO2 Equivalent GHGs (CO2e)

### 3.1 Home

This is the part of the file menu bar that controls the file saving and opening features. The available options are:

- New Project
- Open Project
- Save
- Save As
- Exit

The user should select Open Project if they wish to load in a project that has been previously saved. Note that this will remove any information that has been entered into the GUI unless it has been saved to a file. Save will save the currently loaded project database as a Microsoft Excel file that can be used to open this project again into CalEEMod. Save As will allow the user to change the name of the saved project file. Exit will close CalEEMod. The Microsoft Excel file can be edited following the format of the save file to quickly make edits outside of the Graphical User Interface (GUI). The user will still need to use the GUI for reporting of results. This can be most useful in making changes to construction lists. Individual tabs can be loaded in as a .csv file in various places in CalEEMod to minimize the data entry.

### 3.2 Defining a Project

In order to define a project, the user will have to enter information on both the Project Characteristics screen and land use screen. After entering information on these two screens, CalEEMod will populate all of the other information required to calculate unmitigated construction (unless there is demolition, grading, or site preparation) and operation emissions using default data. Demolition, grading, and site preparation requires additional information regarding the amount of material to be demolished and material (debris, soil, etc) transported to or from the site that is entered on the appropriate construction screens. If site specific information will not be used, the user can jump to entering mitigation measures followed by reporting. If the user has any site-specific information that will replace the default information, this should be entered on the appropriate screens and provide justification for the change in the “Remarks” section at the bottom of each screen before moving on to mitigation and reporting. This justification for the default override will be printed in the report so the user is encouraged to provide a robust reasoning to allow for seamless review of the analysis.

### 3.3 Altering Default Data

CalEEMod was designed to allow for ease in changing default assumptions. Site-specific information that is supported with substantial evidence required by CEQA, is preferred when it is available. However, it is often the case that site-specific information is not available. CalEEMod was designed to assume reasonable default assumptions supported by substantial evidence to

the degree available at the time of programming. CalEEMod is based on fully adopted methods and data. Therefore, draft methods and data are not used as defaults.

### **3.4 Mitigation**

Common construction mitigation measures that impact the calculations in CalEEMod have been incorporated as options for the user to select. At this time, required mitigation measures to comply with individual fugitive dust rules have not been incorporated in unmitigated calculations due to different interpretations of CEQA guidance regarding required mitigation.

Several mitigation measures from CAPCOA's Quantifying Greenhouse Mitigation Measures have been incorporated including combinations and caps when using multiple mitigation measures. Some mitigation measures are not as amenable to simple input information or are less common in their use and therefore not included at this time. CalEEMod was designed to include typical mitigation measures that are some of the more effective measures available to development projects. If mitigation measures are not available as options in CalEEMod, the user can likely alter values in the program that will allow for adjustment of hand calculated reductions due to mitigation that may be less common. This will require separate runs of CalEEMod files in order to properly account for unmitigated and mitigated scenarios.

### **3.5 Reporting**

This is the part of the program that allows the user to select predefined reports that will display the emission calculation results. The user will be able to view these on a screen and save as either a Microsoft Excel file or a pdf file.

## **4 Detailed Program Screens**

### **4.1 Project Characteristics**

The project characteristics screen is where the user enters key location, electricity company information and pollutants they want to analyze. The information on this screen needs to be entered before proper default information can be used in subsequent screens. Changes on this screen will result in overriding user defined data with defaults in subsequent screens where this information is used. Under the Project Detail section the user enters the Project Name which will appear in the reports. The user then selects information from drop down boxes or overrides the default values in the text boxes. Each of the information categories on this screen are described in more detail below.

#### **Project Location**

The user selects the region in which the project is located. The user first selects if they want to choose an Air District, Air Basin, County, or State-wide. The second drop down box will give the list of specific locations based on the first drop down box which the user selects. For counties

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that are divided between air districts, air basins or district requested subregions; the county is followed by the sub-county area which can influence some of the default values selected by modules. Consult your lead agency on their preference for location. This primarily influences on-road vehicle emissions, trip lengths, water supply and treatment electricity use, solid waste disposal rates, amount of paved roads, days of landscaping equipment use, architectural coating emissions, and hearth usage.

### **Wind Speed and Precipitation Frequency**

Selection of project location will fill in the default wind speed and precipitation frequency. The user can choose to override this information and type in a different value. The wind speed is in units of meters per second and is used in some fugitive dust calculations. Precipitation frequency is the number of days in a year that has precipitation greater than 0.01 inches in a day and is used in fugitive dust calculations.

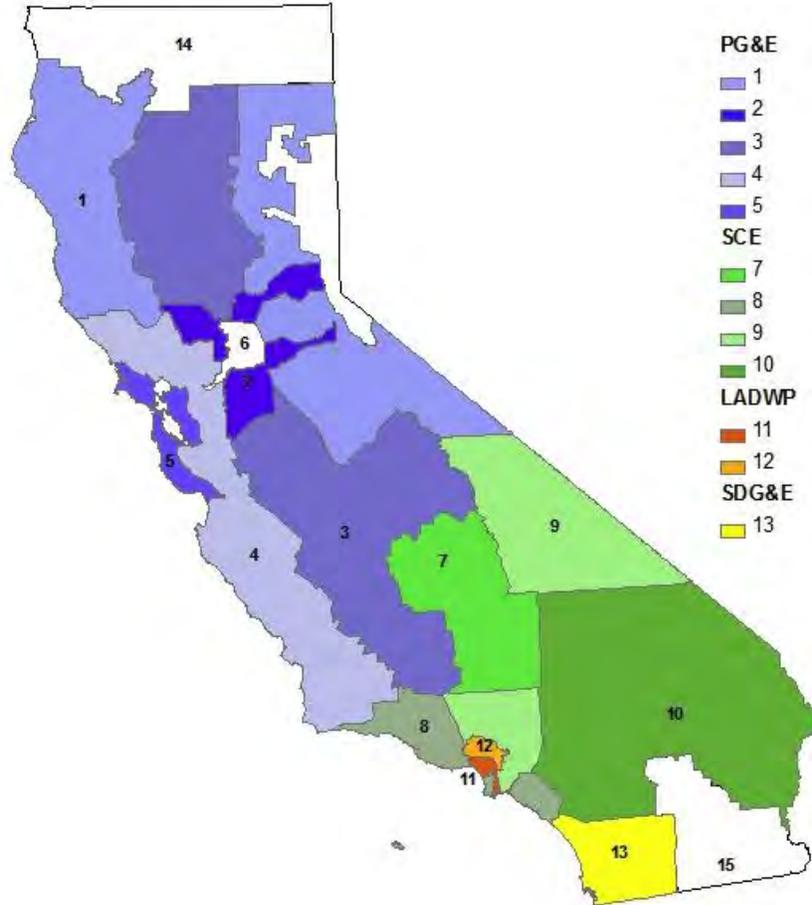
### **Climate Zone**

Selection of project location will restrict the climate zones available for the user to choose from based on the climate zones in the project location. The climate zones used are based on CEC forecasting climate zones (different than Title-24 building climate zones) as used in the California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS)<sup>4</sup>. The figure below indicates these climate zones. A spreadsheet is available in Appendix F, which allows the user to look up climate zones based on city or zipcodes if a user needs further assistance in selecting the appropriate climate zone.

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<sup>4</sup> CalEEMod v. 2013.2 has been updated to incorporate the October 2010 version of RASS.

### CEC Forecast Climate Zones<sup>5,6</sup>



#### Land Use Setting

This is where the user indicates if the project is located in a rural or urban setting. The user should contact their local air districts for guidance on the appropriate land use setting to select as the definition used may differ based on the definitions used to support the urban and rural trip lengths in the relevant air basin.

<sup>5</sup> Adapted from Figure ES-2 of CEC. 2010. Residential Appliance Saturation Survey. Available online at: <http://www.energy.ca.gov/2010publications/CEC-200-2010-004/CEC-200-2010-004-ES.PDF>

<sup>6</sup> White spaces represent areas served by other electric utilities not included in survey.

## Operational Year

The user should indicate the first year the project will be fully operational that they wish to use as a basis for determining emission factors for all operational modules. CalEEMod can handle the following years: 1990, 2000, 2005, 2010-2025, 2030, 2035, and 2040. This was done to limit the file size associated with vehicle emission factors. CalEEMod is currently designed for one year that initiates the beginning of the full operation of the project. However, it is recognized that some projects could be phased so the operation of the project begins over more than one year. In that case, it is recommended the user run the model multiple times for the various input parameters for each operational year.

## Utility Information

The user should select the appropriate electricity utility provider from the list or select “user defined”. If a specific utility is entered, the default GHG intensity factors will be filled in. The user will need to enter values if “user defined” is selected. These values are used to determine the GHG emissions associated with electricity use in various modules. The default values are based on ARB’s Local Government Operations Protocol (LGO)<sup>7</sup>(CO<sub>2</sub>), updated public utility protocols (CO<sub>2</sub>), and E-Grid values (CH<sub>4</sub> and N<sub>2</sub>O). The CO<sub>2</sub> intensity factor used as defaults in CalEEMod are based on the latest reporting year available for each of the different utilities. Table 1.2 in Appendix D provides the default CO<sub>2</sub> intensity factor used and reporting year from which the factor was identified for each of the utilities. As with other defaults in the model, if a new value is identified before the defaults are updated, the user has the ability to override the default and provide justification for the change in the “Remarks” section at the bottom of the “Project Characteristics” screen.

## Pollutants

The list of pollutants to the right of the screen automatically has all boxes checked. Uncheck any pollutants you don’t want reported. Some of the pollutants are a combination of other identified pollutants such as Carbon dioxide (CO<sub>2</sub>) is made up of biogenic and non-biogenic carbon dioxide. CO<sub>2</sub> Equivalent GHGs is the Global Warming Potential (GWP) weighted value of all GHGs. GWPs are based on the IPCC’s Second Assessment Report<sup>8</sup>.

## Remarks

The user can enter any remarks to describe the reasonable explanation and justification of non-default values or to add additional detail regarding the basis for information used such as relevant EIR sections. These remarks are included in the report and will assist a reviewer in understanding the reasons for a change in the default value (e.g., new trip rate based on a project specific traffic study conducted by *reputable traffic engineers*)).

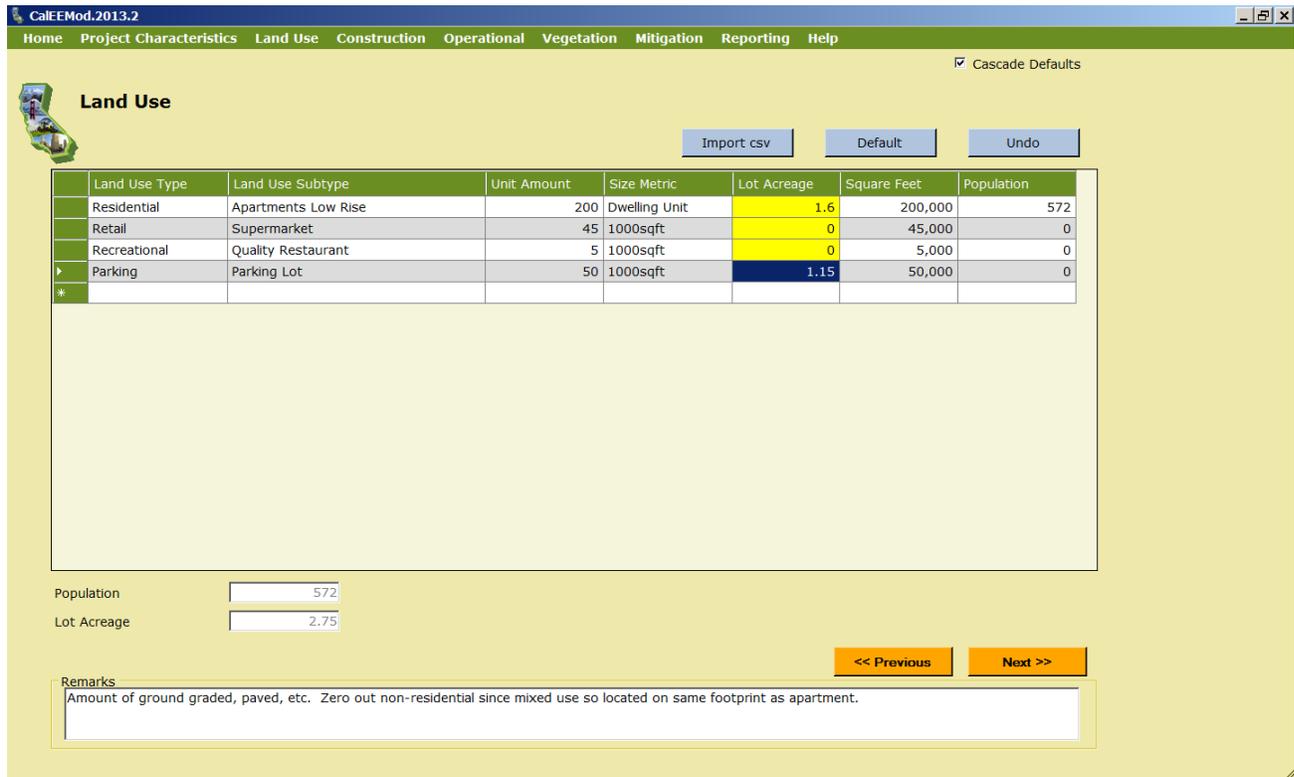
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7 Available at: <http://www.arb.ca.gov/cc/protocols/localgov/localgov.htm>

8 Available at: <http://www.ipcc.ch/pdf/climate-changes-1995/ipcc-2nd-assessment/2nd-assessment-en.pdf>

## 4.2 Land Use

This screen is used to define the specific land uses that will occur at the project site. The land uses, size features and population are used throughout CalEEMod in determining default variables and calculations.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Land Use

Import csv Default Undo

Land Use Type	Land Use Subtype	Unit Amount	Size Metric	Lot Acreage	Square Feet	Population
Residential	Apartments Low Rise	200	Dwelling Unit	1.6	200,000	572
Retail	Supermarket	45	1000sqft	0	45,000	0
Recreational	Quality Restaurant	5	1000sqft	0	5,000	0
Parking	Parking Lot	50	1000sqft	1.15	50,000	0
*						

Population: 572

Lot Acreage: 2.75

Remarks: Amount of ground graded, paved, etc. Zero out non-residential since mixed use so located on same footprint as apartment.

### Land Use Type

The user selects from the drop down list of the primary land use types: Commercial, Educational, Industrial, Residential, Retail, Recreational, and **Parking**. The 63 different land uses types were chosen for inclusion in CalEEMod because each has an established trip rate critical for mobile source calculations.

This program specifically designates parking areas as a separate land use rather than as a part of an associated non-residential land use (e.g., commercial buildings, retail facilities, etc.). Due to the nature of the available data, parking (i.e., driveway) for residential land uses have been incorporated (see discussion under Lot Acreage) so no separate parking land use needs to be identified. For a better understanding of how CalEEMod treats parking based on the footprint and lot acreage of residential and non-residential land uses, please refer to the following figure. As depicted, the lot acreage of a residential land use includes the parking and building footprint. For non-residential land uses, the lot acreage is the same as the building footprint so parking needs to be added as a separate land use.

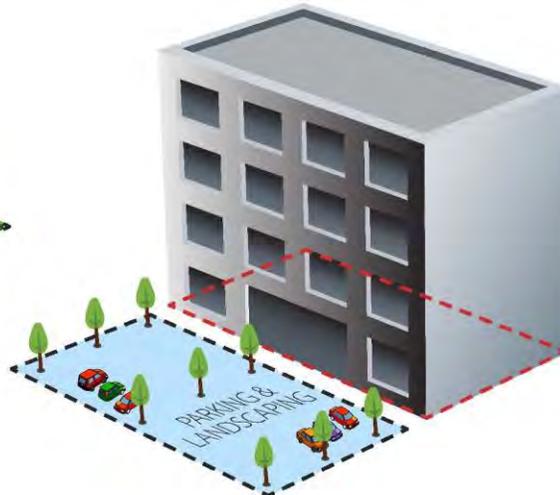
## CalEEMod Default Lot Acreage for Res and Non Res Land Uses

RESIDENTIAL  
SINGLE FAMILY DWELLING



Lot acreage & building footprint are NOT equal. Lot acreage includes grading for parking & landscaping.

NON-RESIDENTIAL  
COMMERCIAL OFFICE BUILDING



Lot acreage & building footprint are equal; add parking as separate land use and assign associated square footage and acreage.

For the parking land use, two primary options are available: parking lots or parking structure (e.g., garages). There are four types of parking structures for the user to choose – enclosed, enclosed with an elevator, unenclosed, or unenclosed with an elevator. The reason for the specific description is to properly calculate energy impacts from ventilation and elevator operation. Parking as a separate land use made the estimate of default acreage and paving area easier.

For those land uses not listed (e.g., roads, underground parking, pipelines, etc.) each land use type has a “User Defined” land use subtype associated with it that the user can select if the other land use subtypes do not describe or reflect the project being analyzed. It is critical to understand that there is no default data (including size metric) associated with the “User Defined” land uses and all information that is based on these land uses will need to be entered by the user otherwise no emissions will be calculated. Also, whatever size metric (e.g., per acre, per 1000 square foot, etc.) the user chooses for the “User Defined” land use needs to be applied to all subsequent default values (e.g., gallons of water used *per acre* or *per 1000 square foot*) associated with that “User Defined” land use. An alternative approach would be to choose a land use that most closely fits the proposed project and allow the model to populate with pre-

determined defaults. Then, go back through the model and modify the defaults with any known specific project information.

### Land Use Subtype

Tabbing over to the next column in a row, the user selects from a drop down list of available land use subtypes based on the primary land use type selected. The user also has the option to select a “User Defined” land use subtype, however, as discussed above, no default data will be available and the user will have to enter in subsequent screens the appropriate values. Land use subtypes are based primarily on the ITE land use definitions used for (mobile source) trip generation rate information. In some cases similar generalized land uses or surrogate data was mapped to some land use subtypes in order to generate the default data needed for various modules.

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
<b>RESIDENTIAL</b>		
Apartments High Rise	High-rise apartments are units located in rental buildings that have more than 10 levels and most likely have one or more elevators.	222
Apartments Low Rise	Low-rise apartments are units located in rental buildings that have 1-2 levels.	221
Apartments Mid Rise	Mid-rise apartments in rental buildings that have between 3 and 10 levels.	223
Condo/Townhouse	These are ownership units that have at least one other owned unit within the same building structure.	230
Condo/Townhouse High Rise	These are ownership units that have three or more levels.	232
Congregate Care (Assisted Living)	These facilities are independent living developments that provide centralized amenities such as dining, housekeeping, transportation and organized social/recreational activities. Limited medical services may or may not be provided.	253
Mobile Home Park	Mobile home parks consist of manufactured homes that are sited and installed on permanent foundations and typically have community facilities such as recreation rooms, swimming pools and laundry facilities.	240
Retirement Community	These communities provide multiple elements of senior adult living. Housing options may include various combinations of senior adult housing, congregate care, assisted living, and skilled nursing care aimed at allowing the residents to live in one community as their medical needs change.	255
Single Family Housing	All single-family detached homes on individual lots typical of a suburban subdivision	210

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
<b>EDUCATIONAL</b>		
Day-Care Center	A day care center is a facility where care for pre-school age children is provided, normally during the daytime hours. Day care facilities generally include classrooms, offices, eating areas and playgrounds.	565
Elementary School	Elementary schools typically serve students attending kindergarten through the fifth or sixth grade. They are usually centrally located in residential communities in order to facilitate student access and have no student drivers.	520
High School	High schools serve students who have completed middle or junior high school.	530
Junior College (2Yr)	This land use includes two-year junior, community, or technical colleges.	540
Junior High School	Junior High schools serve students who have completed elementary school and have not yet entered high school.	522
Library	A library is a facility that consists of shelved books; reading rooms or areas; and sometimes meeting rooms.	590
Place Of Worship	A church is a building in which public worship services are held. A church houses an assembly hall or sanctuary; it may also house meeting rooms, classrooms and occasionally dining catering or party facilities.	560
University/College (4Yr)	This land use includes four-year universities or colleges that may or may not offer graduate programs.	550
<b>RECREATIONAL</b>		
Arena	Arenas are large indoor structures in which spectator events are held. These events vary from professional ice hockey and basketball to non-sporting events such as concerts, shows, or religious services. Arenas generally have large parking facilities, except when located in or around the downtown of a large city.	460
City Park	City parks are owned and operated by a city.	411
Fast Food Restaurant W/O Drive Thru	This land use includes fast-food restaurants without drive-through windows. Patrons generally order at a cash register and pay before they eat.	933
Fast Food Restaurant With Drive Thru	This category includes fast-food restaurants with drive-through windows.	934
Golf Course	Golf courses include 9, 18, 27 and 36 hole courses. Some sites may also have driving ranges and clubhouses with a pro shop, restaurant, lounge and banquet facilities.	430
Health Club	These are privately-owned facilities that primarily focus on individual fitness or training. Typically they provide exercise classes; weightlifting, fitness and gymnastics equipment; spas; locker rooms; and small restaurants or snack bars.	492

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
High Turnover (Sit Down Restaurant)	This land use consists of sit-down, full-service eating establishments with turnover rates of approximately one hour or less. This type of restaurant is usually moderately priced and frequently belongs to a restaurant chain.	932
Hotel	Hotels are places of lodging that provide sleeping accommodations and supporting facilities such as restaurants; cocktail lounges; meeting and banquet rooms or convention facilities; limited recreational facilities and other retail and service shops.	310
Motel	Motels are places of lodging that provide sleeping accommodations and often a restaurant. Motels generally offer free on-site parking and provide little or no meeting space and few supporting facilities.	320
Movie Theater (No Matinee)	Movie theaters consist of audience seating, single or multiple screens and auditoriums, a lobby and a refreshment stand. Movie theaters without matinees show movies on weekday evenings and weekends only; there are no weekday daytime showings.	443
Quality Restaurant	This land use consists of high quality, full-service eating establishments with typical turnover rates of at least one hour or longer. Quality restaurants generally do not serve breakfast, some do not serve lunch; all serve dinner. This type of restaurant usually requires reservations and is generally not part of a chain. Patrons commonly wait to be seated, are served by a waiter, order from menus and pay for meals after they eat.	931
Racquet Club	These are privately-owned facilities that primarily cater to racquet sports.	491
Recreational Swimming Pool	This is a typical recreational swimming pool that may be associated with community centers, parks, swim clubs, etc.	
<b>PARKING</b>		
Enclosed Parking Structure	This is an enclosed parking structure that may be above or below ground. It is not covered in asphalt. This land use will require lighting and ventilation, and will be more than one floor with no elevator.	
Enclosed Parking with Elevator	This is an enclosed parking structure that may be above or below ground. It is not covered in asphalt. This land use will require lighting and ventilation, and will be more than one floor with an elevator.	
Other Asphalt Surfaces	This is an asphalt area not used as a parking lot (e.g., long driveway, basketball court, etc.)	
Other Non-Asphalt Surfaces	This is a non-asphalt area (e.g., equipment foundation, loading dock area, etc.).	
Parking Lot	This is a typical single surface parking lot typically covered with asphalt. This land use will require lighting.	
Unenclosed Parking Structure	This is an unenclosed parking structure that may be above or below ground. It is not covered in asphalt. This land use will require lighting but not ventilation. It will be more than one floor with no elevator.	
Unenclosed Parking with Elevator	This is a unenclosed parking structure that may be above or below ground. It is not covered in asphalt. This land use will require lighting but not ventilation. It will be more than one floor with an elevator.	

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
<b>RETAIL</b>		
Automobile Care Center	An automobile care center houses numerous businesses that provide automobile-related services, such as repair and servicing; stereo installation; and seat cover upholstery.	942
Convenience Market (24 Hour)	These markets sell convenience foods, newspapers, magazines and often beer and wine. They do not have gasoline pumps.	851
Convenience Market With Gas Pumps	These markets sell gasoline, convenience foods, newspapers, magazines and often beer and wine. This includes convenience markets with gasoline pumps where the primary business is the selling of convenience items, not the fueling of motor vehicles.	853
Discount Club	A discount club is a discount store or warehouse where shoppers pay a membership fee in order to take advantage of discounted prices on a wide variety of items such as food, clothing, tires and appliances. Many items are sold in large quantities or in bulk.	857
Electronic Superstore	These are free-standing facilities that specialize in the sale of electronic merchandise.	863
Free-Standing Discount Store	Discount stores offer centralized cashiering and sell products that are advertised at discount prices. These stores offer a variety of customer services and maintain long store hours seven days a week.	815
Free-Standing Discount Superstore	The discount superstore is similar to the free-standing discount stores with the addition that they also contain a full-service grocery department under the same roof that shares entrances and exits with the discount store area.	813
Gasoline/Service Station	This land use includes gasoline/service stations where the primary business is the fueling of motor vehicles. They may also have ancillary facilities for servicing and repairing motor vehicles.	944
Hardware/Paint Store	These stores sell hardware and paint supplies and are generally free-standing buildings.	816
Home Improvement Superstore	These are free-standing facilities that specialize in the sale of home improvement merchandise.	862
Regional Shopping Center	A shopping center is an integrated group of commercial establishments that is planned, developed, owned and managed as a unit. A shopping center's composition is related to its market area in terms of size, location and type of store.	820
Strip Mall	Small strip shopping centers contain a variety of retail shops and specialize in quality apparel, hard goods and services such as real estate offices, dance studios, florists and small restaurants.	814

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
Supermarket	Supermarkets are free-standing retail stores selling a complete assortment of food: food preparation and wrapping materials; and household, cleaning items. Supermarkets may also contain the following products and services: ATMs, automobile supplies, bakeries, books and magazines, dry cleaning, floral arrangements, greeting cards, limited-service banks, photo centers, pharmacies and video rental areas.	850
<b>COMMERCIAL</b>		
Bank (With Drive-Through)	Drive-in banks provide banking facilities for motorists who conduct financial transactions from their vehicles; many also serve patrons who walk into the building.	912
General Office Building	A general office building houses multiple tenants where affairs of businesses commercial or industrial organizations or professional persons or firms are conducted. If information is known about individual buildings, it is suggested that this land use be used instead of the more generic office park.	710
Government (Civic Center)	A group of government buildings that are interconnected by pedestrian walkways.	733
Government Office Building	This is an individual building containing either the entire function or simply one agency of a city, county, state, federal, or other governmental unit.	730
Hospital	A hospital is any institution where medical or surgical care and overnight accommodations are provided to non-ambulatory and ambulatory patients. However, it does not refer to medical clinics or nursing homes.	610
Medical Office Building	This is a facility that provides diagnoses and outpatient care on a routine basis but is unable to provide prolonged in-house medical and surgical care. One or more private physicians or dentists generally operate this type of facility.	720
Office Park	Office parks are usually suburban subdivisions or planned unit developments containing general office buildings and support services, such as banks, restaurants and service stations, arranged in a park-or campus-like atmosphere. This should be used if details on individual buildings are not available.	750
Pharmacy/Drugstore W/O Drive Thru	These are retail facilities that primarily sell prescription and non-prescription drugs. These facilities may also sell cosmetics, toiletries, medications, stationery, personal care products, limited food products and general merchandise. The drug stores in this category do not contain drive-through windows.	880

**Table 1: Land Use Sub Type Descriptions**

Land UseSubType	Description <sup>1</sup>	ITE Number
Pharmacy/Drugstore With Drive Thru	These are retail facilities that primarily sell prescription and non-prescription drugs. These facilities may also sell cosmetics, toiletries, medications, stationery, personal care products, limited food products and general merchandise. The drug stores in this category contain drive-through windows.	881
Research & Development	R&D centers are facilities devoted almost exclusively to R&D activities. The range of specific types of businesses contained in this land use category varies significantly. R&D centers may contain offices and light fabrication areas.	760
<b>INDUSTRIAL</b>		
General Heavy Industry	Heavy industrial facilities usually have a high number of employees per industrial plant and are generally limited to the manufacturing of large items.	120
General Light Industry	Light industrial facilities are free-standing facilities devoted to a single use. The facilities have an emphasis on activities other than manufacturing and typically have minimal office space. Typical light industrial activities include printing, material testing and assembly of data processing equipment.	110
Industrial Park	Industrial parks contain a number of industrial or related facilities. They are characterized by a mix of manufacturing, service and warehouse facilities with a wide variation in the proportion of each type of use from one location to another. Many industrial parks contain highly diversified facilities.	130
Manufacturing	Manufacturing facilities are areas where the primary activity is the conversion of raw materials or parts into finished products. It generally also has office, warehouse, R&D functions at the site.	140
Refrigerated Warehouse-No Rail	This is a warehouse that has refrigeration but no rail spur.	150
Refrigerated Warehouse-Rail	This is a warehouse that has refrigeration and a rail spur.	150
Unrefrigerated Warehouse-No Rail	This is a warehouse that does not have refrigeration and no rail spur.	150
Unrefrigerated Warehouse-Rail	This is a warehouse that does not have refrigeration but has a rail spur.	150

1. Based on land use descriptions in ITE Trip Generation 8th Edition. In September 2012, ITE published the 9<sup>th</sup> edition that updated some of the trip rates from the 8<sup>th</sup> edition. The updates are not yet incorporated into CalEEMod. However, the user has the ability to override the trip rate default but is expected to justify the change in the "Remarks" section at the bottom of the Operational -Mobile screen.

## Unit Amount

Tabbing over to the next column, the user enters the appropriate size of the land use in terms of the size metric selected. This will be used to calculate the rest of the columns in this datagrid.

## Size Metric

Tabbing over to the next column in the land use identification row, the user can select another size metric unit if it is available for that land use subtype. For example, a school land use allows the user to define its size by the number of students, building square footage, or number of employees. Please note that the square footage, which is used for calculating such impacts as architectural coatings and energy use, relates to the total building square footage and not the building footprint or lot acreage (which is used for housing density as well as grading and site preparation calculations).

## Lot Acreage (datagrid)

The user should override the default value if known. For multi-use, multistory building, the square footage should be preserved for each individual land use and the acreage assigned to the residential portion or split between non-residential land uses if there is no residential. The figure below provides an example of a mixed use project and how to apply the appropriate square footage and acreage for an accurate calculation of air quality impacts.

Acreage is used to estimate housing density as needed for calculations (see Table 2) and total acreage for the project is used in assigning construction default data (e.g., grading, site preparation, etc.). Based on ITE data, CalEEMod is able to estimate the acres per dwelling unit (DU) for residential land use. For example, 10 apartments in a low rise will need a 0.625 acre lot (10 DU divided by 16 acres/DU). According to the California Energy Commission's Residential Appliance Saturation Survey (RASS), low rise apartments are 1000 square foot per DU (see Table 2.1) so the building footprint is 0.23 acres (10 DU x 1000 sq ft/DU divided by 43,560 sq ft per acre). Thus, the lot space beyond the residential footprint accounts for driveway and landscaping.

## Example of Mixed Use Project in CalEEMod

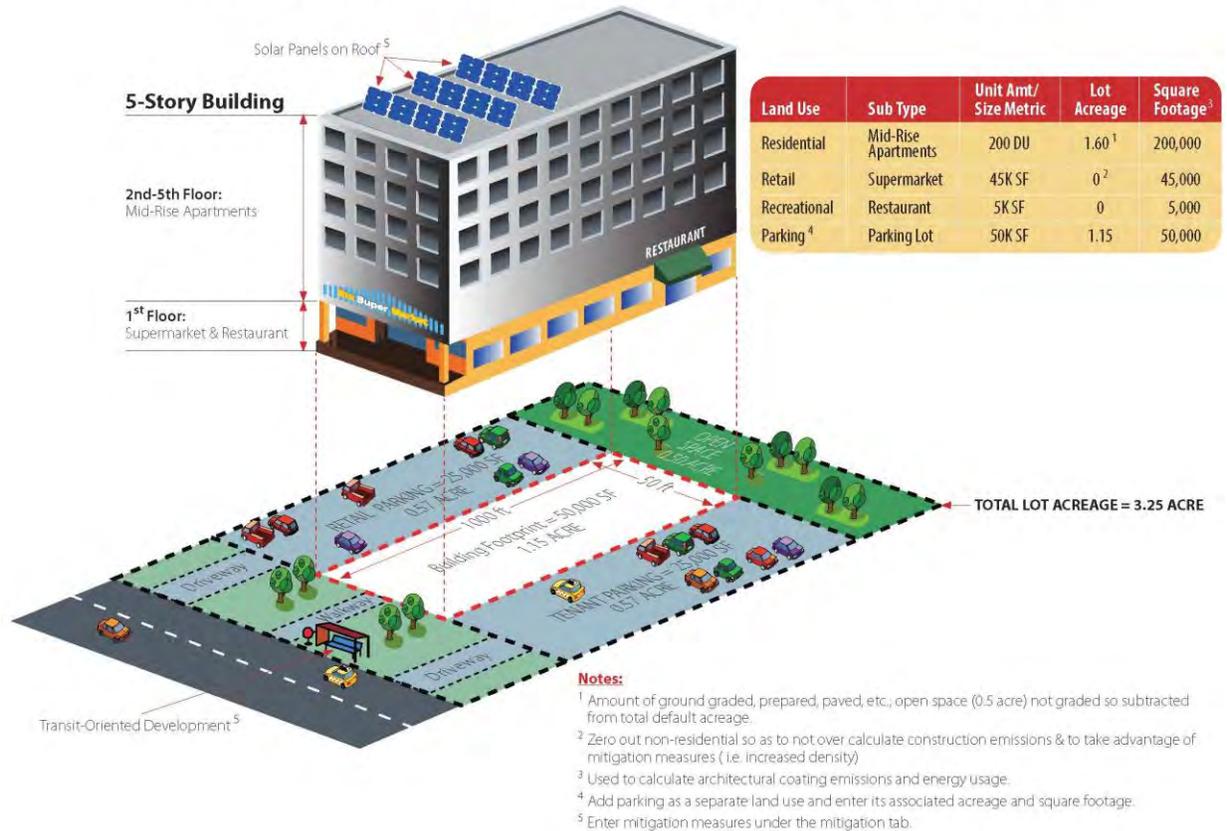


Table 2: Default Housing Density

Land Use Sub Type	Density (Dwelling Units/Acre)
Single Family Housing	3
Apartments low rise	16
Apartments mid rise	38
Apartments high rise	62
Condo/townhouse	16
Condo/townhouse high rise	64
Mobile Home Park	8
Retirement Community	5
Congregate care (Assisted Living)	16

1. Based on the density assumed in ITE Trip Generation 8th Edition

## **Square Footage**

The user should override the default value if known. This is the total building square footage.

## **Population (datagrid)**

This is the population estimated for the land use identified. The user should override the default value if known.

## **Population and Lot Acreage (text box)**

This is the total population and acreage of all land uses entered in the data grid. This is for informational purposes of values that will be used by the program and can't be changed by the user.

## **4.3 Construction**

The construction screen introduces the first of a tabbed structure subscreens. There are seven subscreens for construction with each one listed in the grey area under the screen name. To jump to different subscreens: the user can use the next and previous buttons, click on the grey tab name, or use the menu bar. Default information is based on a survey of construction sites grouped by construction phase and lot acreage performed by SCAQMD which can be found in Appendix E. The default construction equipment list and phase length are most appropriate for the size and types surveyed while the survey has been extrapolated to indicate default values, more detailed site specific equipment and phases are highly suggested in these cases for the most accurate results.

### **4.3.1 Construction Phase**

This is the screen where the user enters the type of each construction phase and the date range of these phases. The date of the construction phase is critical in determining the correct emission factor for the off-road equipment since CARB's factors change each year. Default phases are based on the total lot acreage of the project. Depending on the project being modeled, not all phases will be necessary (e.g., not all projects require demolition). In addition multiple phases of similar types may be used for large projects with build out in stages. If the project has demolition, grading, and site preparation phases, additional project specific data will need to be entered on Demolition subscreen and Dust from Material Movement subscreen.

#### **Phase Name**

The user should enter a unique name for the phase in the text box.

#### **Phase Type**

The user selects from the drop down list the type of construction phase: Site preparation, demolition, grading, building construction, paving, and architectural coating. This influences the types of calculations and default assumptions for on-road vehicle trips and fugitive emissions that occur in subsequent construction subscreens. The definitions of the default data phases are as follows:

- 
- Demolition involves tearing down of buildings or structures.
  - Site Preparation involves clearing vegetation (grubbing and tree/stump removal) and stones prior to grading.
  - Grading involves the cut and fill of land to ensure the proper base and slope for the construction foundation.
  - Building Construction involves the construction of structures and buildings.
  - Architectural Coating involves the application of coatings to both the interior and exterior of buildings or structures and includes parking lot striping as well as painting of the walls of parking structures.
  - Paving involves the laying of concrete or asphalt such as in parking lots or roads.

### **Start Date and End Date**

The user can enter with the aid of a calendar, the start and end dates. The default start date is 1/1/2014 starting with demolition with subsequent phases starting the next day after the previous phase's end date. Changes to these cells will alter the total days estimated for the phase.

### **Days per Week**

The user can select from a drop down box the number of days per week (5, 6, or 7) the project will operate. Five days per week is assumed to be Monday through Friday, and six days per week is Monday through Saturday.

### **Total Days**

The total number of days in the construction phase is indicated. If the end date or the days per week are changed, clicking in this cell will recalculate the number of days. If the total number of days for a phase is changed, then once leaving this cell, the program will adjust the end date based on the start date for that phase.

## **4.3.2 Off-Road Equipment**

This subscreen shows the off-road equipment usage for each phase. Since equipment lists can be lengthy, the user must go through a different subscreen for each phase. This is done by selecting the appropriate phase name from the drop down list or the Previous or Next buttons located next to the phase name. The emission calculations associated with this screen are from off-road equipment engine use based on the equipment list and phase length. The fugitive emissions from off-road equipment performing work are associated with additional information in other construction screens.

The user enters in the datagrid each piece of equipment in the phase in a new row. The user enters the unit amount and hours per day of equipment usage. Horsepower and load factors are loaded with the default average values of the mode tier according to population based on OFFROAD2011, but the user can override these values. Since CalEEMod is restricted in the

years of OFFROAD emission factors, CalEEMod will use the lower end year if a construction year is in between a year of OFFROAD values in the database. For example if a construction phase is in 2027, CalEEMod will use OFFROAD emission factors from 2025.

For site specific construction equipment lists including equipment not specifically listed can be added under the Other Equipment categories or Off-Highway Trucks listed in CalEEMod matching the closest in horsepower to the missing equipment for each phase the construction equipment is operating. For inclusion of water trucks and cement trucks specifically can be considered in two ways although both of those trucks were part of the SMAQMD vendor trip survey during construction. The first is to use the Off-Highway Trucks category in this screen. The second is to add these as additional vendor trips in the Trips and VMT screen.

### **4.3.3 Dust from Material Movement**

This subscreen is used to enter the information necessary to calculate the fugitive dust emissions associated with grading phases. Three distinct fugitive dust calculations are performed as described in Appendix A: dust from dozers moving dirt around, dust from graders or scrapers leveling the land, and loading or unloading the dirt into haul trucks. These methods have been adapted from USEPA's AP-42 method for Western Coal Mining. The user needs to enter the amount of material imported and exported to the site in order for CalEEMod to estimate hauling trips correctly from material transport. There is an option to select either ton of debris or cubic yards. The user also selects if the import and export of material are phased. If they are phased a truck comes in with material and leaves with another load of material to export. Non-phased trips have one-way of the haul trip performed with an empty truck. Phasing material import and export reduces the number of haul trips. The number of acres that are displayed represent the total acres traversed by grading equipment assuming a blade width of 12 feet. In order to properly grade a piece of land multiple passes with equipment may be required. The acres is based on the equipment list and days in grading or site preparation phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday. See Appendix A for the equipment specific grading rates.

### **4.3.4 Demolition**

This subscreen is used to enter the amount of material that is demolished if demolition phases are selected. The user can enter either the ton of material or the building square footage. Fugitive dust emissions from the demolition are then calculated. Demolition fugitive dust emissions are based on the methodology described in the report prepared for the USEPA by Midwest Research Institute, Gap Filling PM<sub>10</sub> Emission Factors for Selected Open Area Dust Sources.

### **4.3.5 Trip and VMT**

This subscreen is used to provide the number and length of on-road vehicle trips for workers, vendors, and hauling. It also allows the user to select different weightings of vehicle fleet mixes and is either the EMFAC mix for the region, or an mix of the vehicle classes listed. HHDT,MHDT is a 50/50 percent mix of heavy-heavy duty trucks and medium-heavy duty trucks. LDA,LDT1,

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LDT2 is 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2. Since CalEEMod is restricted in the years of EMFAC emission factors, CalEEMod will use the lower end year if a construction year is in between a year of EMFAC values in the database. For example if a construction phase is in 2027, CalEEMod will use EMFAC emission factors from 2025.

The number of workers is 1.25 times the number of pieces of equipment for all phases except building construction and architectural coating. Building construction estimates the number of workers based on the types of land use and their size based on an analysis of a study conducted by SMAQMD. This study and its analysis are included in Appendix E. The number of workers for architectural coating is based on 20% of the building construction workers.

The number of vendor trips for building construction phase is based on a study performed by SMAQMD based on land use types and their size. As noted earlier, the SMAQMD trip survey during construction counted cement and water trucks as vendor trips. These values were placed under the “building construction” phase in CalEEMod. If the “building construction” phase is being eliminated and there are known water (and/or cement) trucks, it is recommended to consider those vendor trips under another phase or accounted for as OFFROAD equipment. Hauling trips are based on the assumption that a truck can handle 20 tons (or 16 cubic yards) of material per load. Assuming one load of material, CalEEMod considers a haul truck importing material will have a return trip with an empty truck (2 trips). Similarly, the haul truck to take material away will have an arrival trip in an empty truck (2 trips). Thus, each trip to import and export material is considered as two separate round trips (4 trips) unless the “phase” box is clicked. Then, a haul truck trip to import material will be the same haul truck to export material (2 trips).

#### **4.3.6 On-Road Fugitive Dust**

This subscreen defines the variables that will be used to determine the fugitive dust emissions from construction on-road vehicles over paved and unpaved roads. The emission calculations are based on USEPA’s AP-42 January 2011 paved road and November 2006 unpaved roads emission factors. The variables in this datagrid are the same as those defined in the appropriate AP-42 sections.

#### **4.3.7 Architectural Coatings**

This subscreen allows the user to override any of the default interior and exterior surface area estimated for residential and non-residential buildings. In addition, each of these surface types has a different emission factor indicating the VOC content of the paint in grams per liter. See Appendix A for the method of estimating surface areas to be coated from building square footage.

### **4.4 Operational Mobile**

The operational mobile screen is made up of 3 subscreens: Vehicle Trips, Vehicle Emissions, and Road Dust. These screens are used in defining the information necessary to calculate the emissions associated with operational on-road vehicles.



### 4.4.1 Vehicle Trips

This subscreen's datagrid lists the trip rate, trip lengths, trip purpose, and trip type percentages for each land use subtype in the project. The user can edit any of this information by entering a new value in the appropriate cell. Trip rates are in terms of the size metric (square footage or dwelling unit) defined on the land use screen and are listed for weekday, Saturday and Sunday if available. Trip lengths are for primary trips. Trip purposes are primary, diverted, or pass-by trips. Diverted trips are assumed to take a slightly different pass than a primary trip and are assumed to be 25% of the primary trip lengths. Pass-by trips are assumed to be 0.1 miles in length and are a result of no diversion from the primary route. Residential trip types are defined as home-work (H-W), home-shop (H-S), and home-other (H-O). Non-residential trip types are defined as commercial –customer (C-C), commercial-work (C-W), and commercial-nonwork (C-NW) such as delivery trips. See Appendix A for the equations and methodology used to calculate motor vehicle emissions from the operation of a project.

In most cases the trip rate is based on ITE's average trip rate for the respective land use category. For warehouses, SCAQMD evaluated the primary data from ITE along with other recent studies regarding warehouses and concluded that it was more appropriate to break out the warehouses based on access to a rail spur and refrigeration. In addition, they concluded that it was more appropriate to use the maximum values from the studies. A detail memorandum describing the justification for these values is contained in Appendix E.

The screenshot shows the CalEEMod.2013.2 software interface. The main window title is 'CalEEMod.2013.2'. The menu bar includes 'Home', 'Project Characteristics', 'Land Use', 'Construction', 'Operational', 'Vegetation', 'Mitigation', 'Reporting', and 'Help'. A 'Cascade Defaults' checkbox is checked. The current screen is titled 'Operational - Mobile' and has three tabs: 'Vehicle Trips', 'Vehicle Emissions', and 'Road Dust'. Below the tabs are buttons for 'Import csv', 'Default', and 'Undo'. The main area contains a datagrid with the following data:

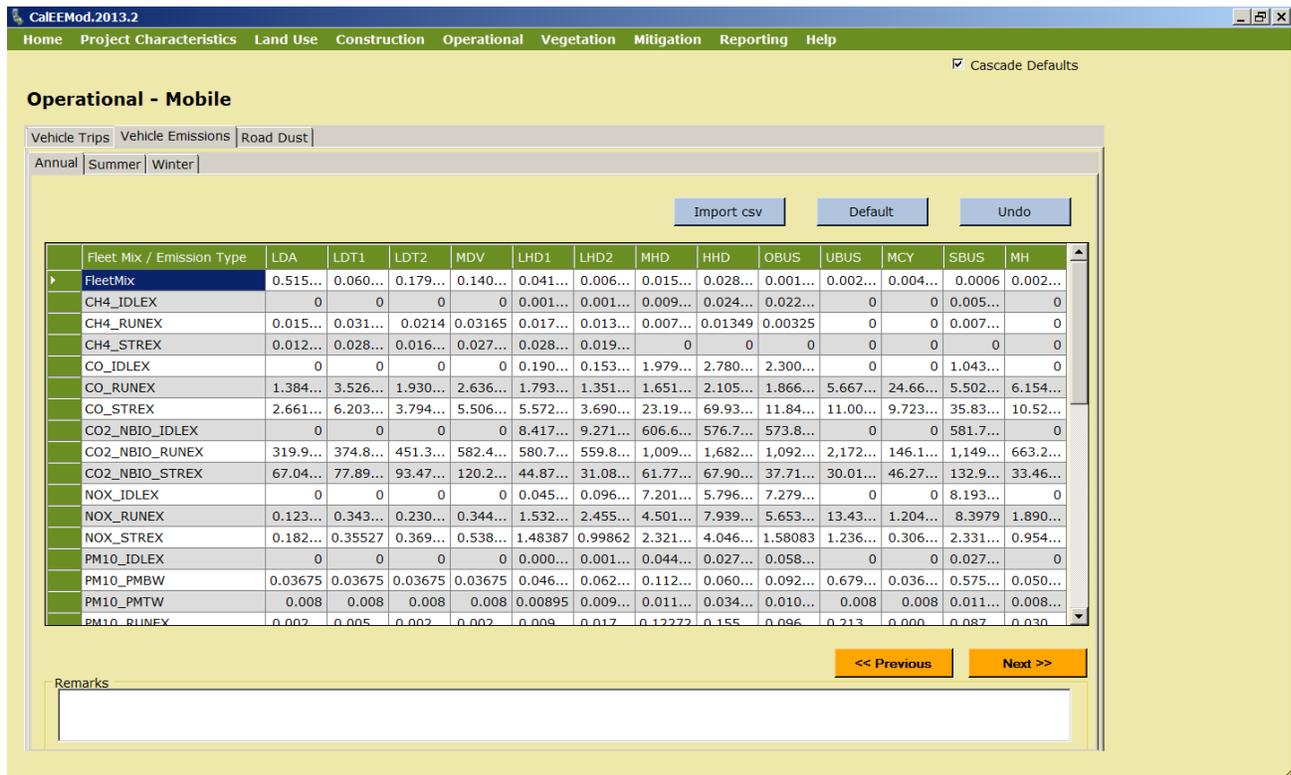
Land Use SubType	Size Metric	Wkd Trip Rate (/size /day)	Sat Trip Rate (/size /day)	Sun Trip Rate (/size /day)	Res H-W Trip Length (miles)	Res H-S Trip Length (miles)	Res H-O Trip Length (miles)	Non Res C-C Trip Length (miles)	Non Res C-W Trip Length (miles)	Non Res C-NW Trip Length (miles)	Prima Trip (%)	Divert Trip (%)	Pass-Trip (%)	Res H-W Trip (%)	Res H-S Trip (%)	Res H-O Trip (%)	Non Res C-C Trip (%)	Non Res C-W Trip (%)	Non Res C-NW Trip (%)
Apartments Lo...	Dwelling Unit	6.59	7.16	6.07	14.7	5.9	8.7	0	0	0	86	11	3	40.2	19.2	40.6	0	0	0
Parking Lot	1000sqft	0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0	0	0	0	0	0
Quality Restaur...	1000sqft	89....	94....	72....	0	0	0	8.4	16.6	6.9	38	18	44	0	0	0	69	12	19
Supermarket	1000sqft	10...	17...	16...	0	0	0	8.4	16.6	6.9	34	30	36	0	0	0	74.5	6.5	19

At the bottom of the datagrid area, there are navigation buttons: '<< Previous' and 'Next >>'. Below the datagrid is a 'Remarks' text area.

### 4.4.2 Vehicle Emissions

This subscreen is a large datagrid containing the detailed vehicle emission factors and fleet mix based on EMFAC2011. See Appendix A for information on how these emission factors were developed based on burden mode EMFAC runs including effects from Pavley (Clean Car Standards) and Low Carbon Fuel Standards. Pavley and Low Carbon Fuel Standards are applicable for future years and do not impact EMFAC values prior to these regulations implementations (i.e, 1990, 2000, 2005, etc). It is anticipated that most users will not edit data in this subscreen. There is a separate tab for annual, summer, and winter emission values. If the user wants to alter the breakdown of fuel types (catalytic, non-catalytic, other) within a vehicle class, they will have to provide their own data as this will likely be an infrequent change due to CEQA enforceability requirements. For details on how EMFAC data was processed see Appendix A.

This screen along with the previous screen (Vehicle Trips) will calculate the emissions associated with on-road motor vehicle use. It does not include the fugitive dust emissions from travel over roads as these are associated with the next screen (Road Dust).



The screenshot shows the 'Operational - Mobile' screen in the CalEEMod.2013.2 application. The interface includes a menu bar (Home, Project Characteristics, Land Use, Construction, Operational, Vegetation, Mitigation, Reporting, Help) and a toolbar with buttons for 'Import csv', 'Default', and 'Undo'. The main area displays a datagrid with columns for 'Fleet Mix / Emission Type' and various emission factors (LDA, LDT1, LDT2, MDV, LHD1, LHD2, MHD, HHD, OBUS, UBUS, MCY, SBUS, MH). The datagrid lists various emission types such as CH4\_IDLEX, CH4\_RUNEX, CO\_IDLEX, CO\_RUNEX, CO2\_NBIO\_IDLEX, CO2\_NBIO\_RUNEX, NOX\_IDLEX, NOX\_RUNEX, PM10\_IDLEX, and PM10\_RUNEX. Below the datagrid, there are 'Previous' and 'Next' navigation buttons and a 'Remarks' text area.

Fleet Mix / Emission Type	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
FleetMix	0.515...	0.060...	0.179...	0.140...	0.041...	0.006...	0.015...	0.028...	0.001...	0.002...	0.004...	0.0006	0.002...
CH4_IDLEX	0	0	0	0	0.001...	0.001...	0.009...	0.024...	0.022...	0	0	0.005...	0
CH4_RUNEX	0.015...	0.031...	0.0214	0.03165	0.017...	0.013...	0.007...	0.01349	0.00325	0	0	0.007...	0
CH4_STREX	0.012...	0.028...	0.016...	0.027...	0.028...	0.019...	0	0	0	0	0	0	0
CO_IDLEX	0	0	0	0	0.190...	0.153...	1.979...	2.780...	2.300...	0	0	1.043...	0
CO_RUNEX	1.384...	3.526...	1.930...	2.636...	1.793...	1.351...	1.651...	2.105...	1.866...	5.667...	24.66...	5.502...	6.154...
CO_STREX	2.661...	6.203...	3.794...	5.506...	5.572...	3.690...	23.19...	69.93...	11.84...	11.00...	9.723...	35.83...	10.52...
CO2_NBIO_IDLEX	0	0	0	0	8.417...	9.271...	606.6...	576.7...	573.8...	0	0	581.7...	0
CO2_NBIO_RUNEX	319.9...	374.8...	451.3...	582.4...	580.7...	559.8...	1,009...	1,682...	1,092...	2,172...	146.1...	1,149...	663.2...
CO2_NBIO_STREX	67.04...	77.89...	93.47...	120.2...	44.87...	31.08...	61.77...	67.90...	37.71...	30.01...	46.27...	132.9...	33.46...
NOX_IDLEX	0	0	0	0	0.045...	0.096...	7.201...	5.796...	7.279...	0	0	8.193...	0
NOX_RUNEX	0.123...	0.343...	0.230...	0.344...	1.532...	2.455...	4.501...	7.939...	5.653...	13.43...	1.204...	8.3979	1.890...
NOX_STREX	0.182...	0.35527	0.369...	0.538...	1.48387	0.99862	2.321...	4.046...	1.58083	1.236...	0.306...	2.331...	0.954...
PM10_IDLEX	0	0	0	0	0.000...	0.001...	0.044...	0.027...	0.058...	0	0	0.027...	0
PM10_PMBW	0.03675	0.03675	0.03675	0.03675	0.046...	0.062...	0.112...	0.060...	0.092...	0.679...	0.036...	0.575...	0.050...
PM10_PMTW	0.008	0.008	0.008	0.008	0.00895	0.009...	0.011...	0.034...	0.010...	0.008	0.008	0.011...	0.008...
PM10_RUNEX	0.002	0.005	0.002	0.002	0.009	0.017	0.12272	0.155	0.096	0.213	0.000	0.087	0.030

### 4.4.3 Road Dust

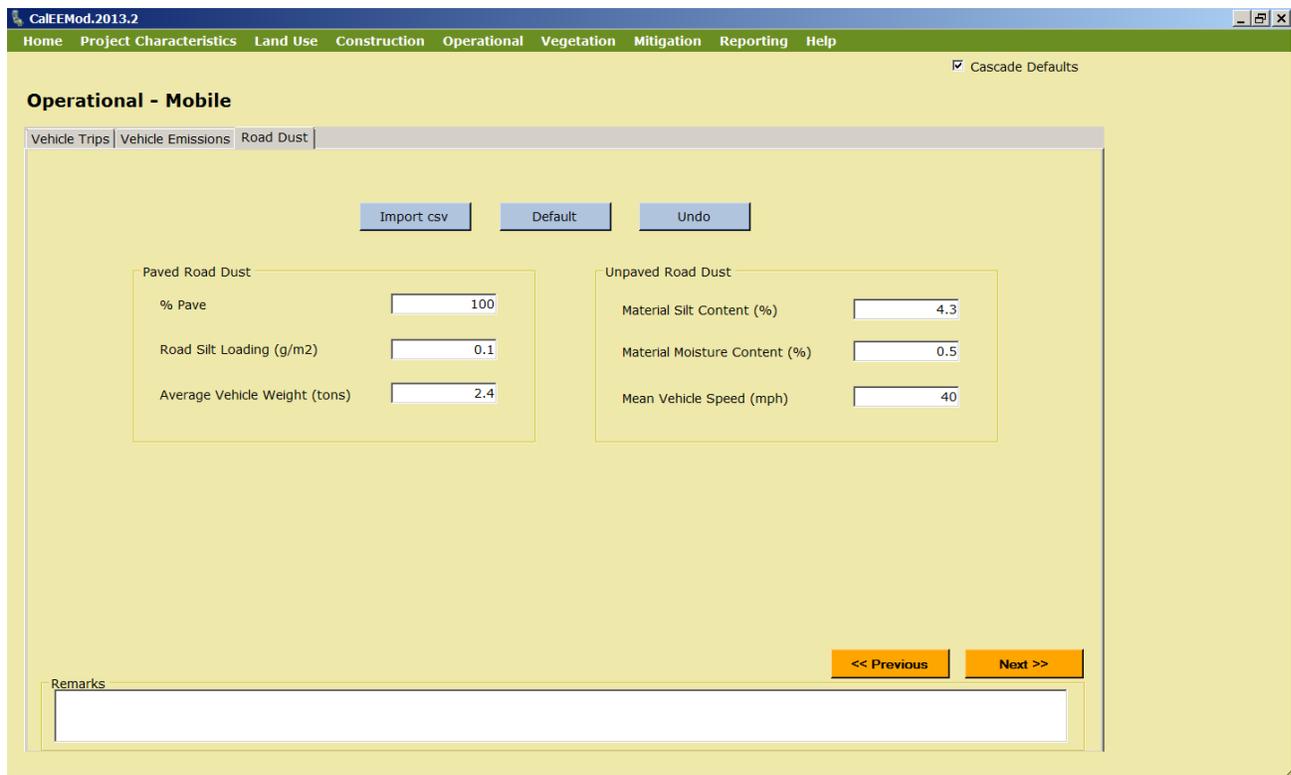
This subscreen is used to change any of the default values that are used in the USEPA's AP-42 methods for calculating fugitive emissions from paved and unpaved roads. The defaults for the road dust (e.g., material silt content, material moisture content, ) are statewide averages, but the user has the ability to override the defaults if data specific to the project is known. Local jurisdictions can also provide guidance to users as to what default properly reflects known regional road dust parameters.

For the San Luis Obispo region, users are recommended to provide the following road dust parameters overriding the statewide defaults:

9.3 for "Material Silt Content (%)" *(instead of 4.3 statewide default)*

0.1 for "Material Moisture Content (%)" *(instead of 0.5 statewide default)*

32.4 for "Mean Vehicle Speed (mph)" *(instead of 40 statewide default)*



The screenshot shows the CalEEMod 2013.2 software interface. The main menu includes Home, Project Characteristics, Land Use, Construction, Operational, Vegetation, Mitigation, Reporting, and Help. The 'Operational - Mobile' section is active, with a 'Road Dust' tab selected. The interface features three buttons: 'Import csv', 'Default', and 'Undo'. Below these are two columns of input fields:

Paved Road Dust		Unpaved Road Dust	
% Pave	100	Material Silt Content (%)	4.3
Road Silt Loading (g/m2)	0.1	Material Moisture Content (%)	0.5
Average Vehicle Weight (tons)	2.4	Mean Vehicle Speed (mph)	40

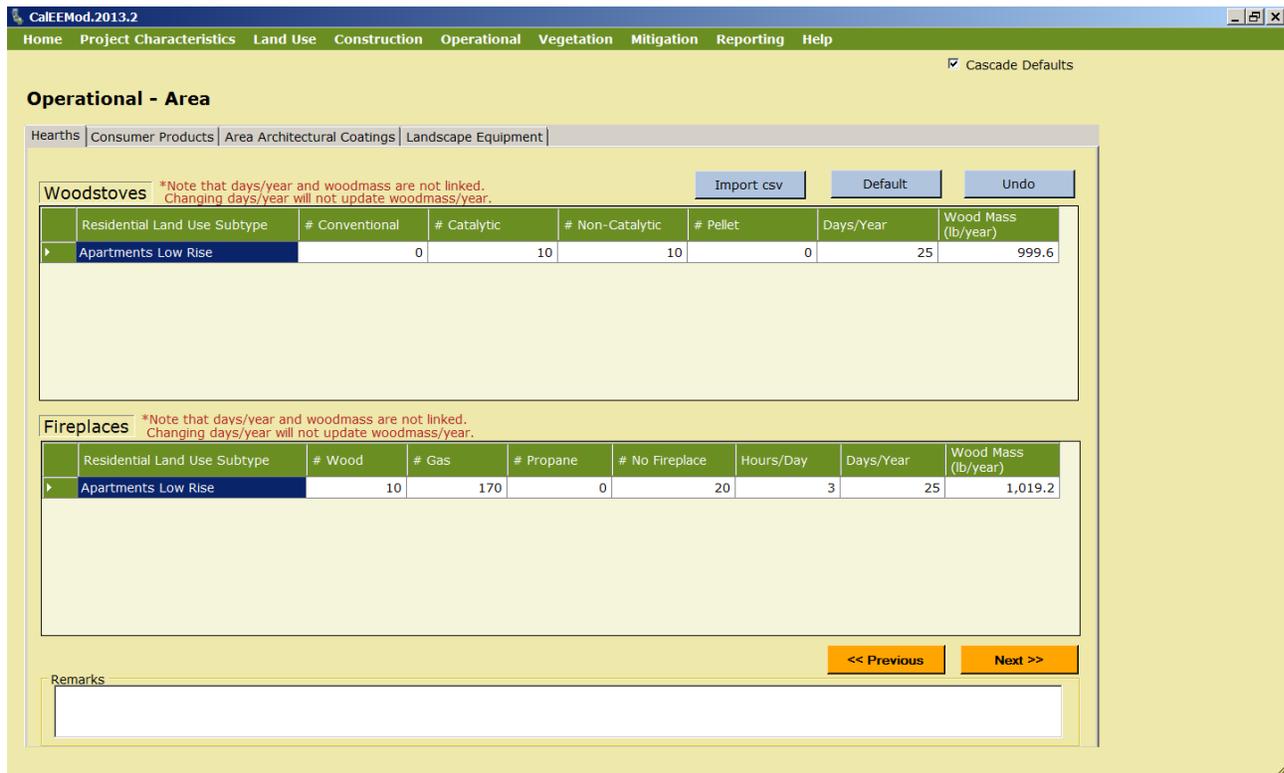
At the bottom right, there are '<< Previous' and 'Next >>' buttons. A 'Remarks' field is located at the bottom left.

### 4.5 Area

The area source screen consists of four subscreens: Hearths, Consumer Products, Area Architectural Coatings, and Landscaping Equipment. Natural gas emission variables from all uses except hearths are included in the energy use screen.

### 4.5.1 Hearths and Woodstoves

This subscreen allows the user to enter the number of woodstoves and hearths of various types as well as the usage of these devices. Woodstoves are separate from fireplaces since a home may have both and these devices may have different use patterns. The number of devices that is entered for each device type represents the total number of devices installed in the dwelling units for a particular land use. See Appendix A for emissions calculation methodology and details of variables that the user can not override. Some of these emissions may be classified as biogenic and are therefore reported as CO<sub>2</sub>-Biogenic. For most locations a default percent of hearths and stoves was provided by districts and is multiplied through. The number was chosen for CalEEMod instead of a percentage to allow for incorporation of various districts rules regarding hearths and woodstoves in new residences without having specialized screens. Commercial land uses by default do not have any hearths or woodstoves in CalEEMod. These are included for those cases where they may occur such as in restaurants or hotels.



The screenshot shows the 'Operational - Area' screen in CalEEMod 2013.2. The 'Hearths' tab is selected, and the 'Woodstoves' section is active. A table displays data for 'Apartments Low Rise'.

Residential Land Use Subtype	# Conventional	# Catalytic	# Non-Catalytic	# Pellet	Days/Year	Wood Mass (lb/year)
Apartments Low Rise	0	10	10	0	25	999.6

Residential Land Use Subtype	# Wood	# Gas	# Propane	# No Fireplace	Hours/Day	Days/Year	Wood Mass (lb/year)
Apartments Low Rise	10	170	0	20	3	25	1,019.2

The San Joaquin Valley jurisdiction has a regulatory limit on the number of hearths depending upon the type and number of residential development. The regulatory limit is generated by CalEEMod but all the input parameters (e.g., unit density, etc.) are necessary to determine the value. Thus, the regulatory limit is disclosed during the reporting stage under the “Default Value” box in the report. The model, however, calculates emission impacts from the number of hearths inputted on the Area source screen (listed under the “New Value” column in the report). Therefore, if the user wants to calculate emissions from regulatory limit, the report needs to be run to determine the regulatory limit and the user needs to go back to the Area source screen to

input that value and re-run the report. If the user chooses to calculate emissions from a different number of hearths (e.g, a number of hearths less than the regulatory limit), then that number needs to be inputted on the Area source screen to properly calculate emissions. Again, the report will provide the regulatory limit under the “Default Value” column and the user input value under “New Value” column.

#### **4.5.2 Consumer Products**

Consumer products are various solvents used in non-industrial applications which emit VOCs during their product use. These typically include cleaning supplies, kitchen aerosols, cosmetics and toiletries. SCAQMD has developed an emission factor based on the total of all building square footage for both residential and non-residential buildings. Details of how this emission factor was developed can be found in Appendix E. The user can change this emission factor if they have more relevant data.

#### **4.5.3 Area Architectural Coating**

This subscreen has text boxes for the reapplication rate and paint VOC content for each building surface type. The reapplication rate is the frequency at which surfaces get repainted every year. A default of 10% is used which means that 10% of the surface area is repainted each year so all surfaces are completely repainted once every 10 years. Daily emissions divide the annual rate by 365 days per year. This is based on assumptions used by SCAQMD in their district rules regarding architectural coatings. Some districts provided details on their coating regulations that phase in over time which have been incorporated to the extent feasible given the general classifications of paint (interior or exterior for residential and non-residential). As not all districts submitted their architectural coating regulations, consult your local agency for any suggested values that may be lower than the state regulations.

If changing the operational architectural coating VOC content (e.g., lower VOC content limit), the User is advised to change the architectural coating VOC content under the Area Mitigation screen where the operational coating VOC content defaults will not change unless prompted. If not, the model assumes the value on the mitigation screen is the “New Value” (as listed in report). In the case of applying a lower VOC content limit on the operational architectural coating screen, the unchanged mitigation value (“New Value”) will be higher. However, unless the box is checked on the Area Mitigation screen next to the coating type, the model will not calculate a mitigated emissions value.

#### **4.5.4 Landscape Equipment**

This subscreen has two text boxes to show the number of snow days or summer days. In addition, the defaults consider a realistic number of days which the landscaping equipment would be operated. For example, landscaping at commercial facilities typically do not take place during a weekend or during the summer at educational facilities that are not open. The number of days are applied to the appropriate landscape equipment types available in OFFROAD2011 using the average horsepower and load factors of the population mode. The

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derivation of emission factors used for each equipment type from OFFROAD2011 is described in Appendix A.

## 4.6 Energy Use

The energy use screen is used to gather the information necessary to estimate the emissions associated with building electricity and natural gas usage (non-hearth). The electricity energy use is in kilowatt hours per size metric for each land use subtype and natural gas use is in kiloBritish Thermal Units (kBTU) per size metric for each land use subtype. The California Energy Code contains energy conservation standards applicable to all residential and non-residential buildings throughout California, including schools. The electricity use is split into three areas: Title-24, non-Title 24, and lighting. The Title 24 of the California Code of Regulations, known as the California Building Standards Code (or "Title 24"), uses are defined as the major building envelope systems covered by Part 6 (California Energy Code) of Title 24 such as space heating, space cooling, water heating, and ventilation. Lighting was separated out since it can be both part and not part of Title-24. Since lighting is not considered as part of the building envelope energy budget, CalEEMod does not consider lighting to have any further association with Title 24 references in the program. Non-Title 24 is everything else such as appliances and electronics. Natural gas is just distinguished as Title 24 or Non-Title 24. The default values are based on the CEC sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies<sup>9</sup>. For climate zones not included in these surveys a data from the closest climate zone was used as a surrogate. Since these studies are based on older buildings, adjustments have been made to account for changes to Title 24 building codes as described in Appendix A. A user should select the use historical box if they only want an adjustment to the 2005 standards which were in effect when ARB developed its Scoping Plan 2020 No Action Taken predictions. After selecting the historical button, the user must also click the default button to load the historical default values.

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9 CEC. October 2010. Residential Appliance Saturation Survey. Available online at:

<http://www.energy.ca.gov/appliances/rass>

CEC. 2006. Commercial End-Use Survey. Available online at: <http://www.energy.ca.gov/ceus/>



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

### Operational - Energy Use

Using Historical Data

Import csv Default Undo

Land Use Subtype	Title-24 Electricity Energy Intensity (KWhr/size/yr)	Nontitle-24 Electricity Energy Intensity (KWhr/size/yr)	Lighting Energy Intensity (KWhr/size/yr)	Title-24 Natural Gas Energy Intensity (KBTU/size/yr)	Nontitle-24 Natural Gas Energy Intensity (KBTU/size/yr)
▶ Apartments Low Rise	636.58	2,630.88	810.36	11,224.2	2,498
Parking Lot	0	0	0.88	0	0
Quality Restaurant	15.13	28.48	8.79	81.74	195.77
Supermarket	7.42	22.82	9.1	13.31	6.61

Remarks

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## 4.7 Water and Wastewater Use

This module only estimates the land uses contribution of GHG emissions associated with supplying and treating the water and wastewater. This screen is used to enter the amount of water in gallons used indoors and outdoors for each land use subtype<sup>10</sup>. The indoor water is also used to estimate the amount of wastewater. The electricity intensity for various phases of providing water is broken out. Depending on the specific water supply used or treatment method used these numbers can vary over a wide range. Supplying water is bringing the water from its primary source such as the ground, river, or snowpack to the treatment plant. Distributing the water is bringing the water from the treatment plant to the end users. The electricity intensities are multiplied by the utility intensity factors for the GHGs and are classified as indirect emissions. The default electricity intensity is from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern and

10 Gleick, P.H.; Haasz, D.; Henges-Jeck, C.; Srinivasan, V.; Cushing, K.K.; Mann, A. 2003. Waste Not, Want Not: The Potential for Urban Water Conservation in California. Published by the Pacific Institute for Studies in Development, Environment, and Security. Full report available online at: [http://www.pacinst.org/reports/urban\\_usage/waste\\_not\\_want\\_not\\_full\\_report.pdf](http://www.pacinst.org/reports/urban_usage/waste_not_want_not_full_report.pdf). Appendices available online at: [http://www.pacinst.org/reports/urban\\_usage/appendices.htm](http://www.pacinst.org/reports/urban_usage/appendices.htm)

Dziegielewski, B.; Kiefer, J.C.; Optiz, E.M.; Porter, G.A.; Lantz, G.L.; DeOreo, W.B.; Mayer, P.W.; Nelson, J.O. 2000. Commercial and Institutional End Uses of Water. Published by the American Water Works Association Research Foundation.

Northern California Golf Association. Improving California Golf Course Water Efficiency. <http://www.owue.water.ca.gov/docs/2004Apps/2004-079.pdf>



Southern California<sup>11</sup>. The location will automatically select the appropriate values if using these defaults. Since the electricity can vary greatly based on locations, the user should override these values if they have more specific information regarding their specific water supply and treatment.

Wastewater may also have direct emissions of GHGs. These depend on the type of wastewater treatment system (e.g., septic, aerobic or lagoons) used and therefore the wastewater treatment type percentages are variables. In addition, the model calculates impacts if the solids are digested either through an anaerobic digester or with co-generation from combustion of digester gas. Each type has associated GHG emission factors. Some of these may be classified as biogenic. Not all of the biogenic emissions are accounted for since there are not adequate emissions factors at this time. Refer to Appendix A on how to properly change the defaults, if necessary, and the methodology used to calculate impacts from wastewater treatment.

CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

**Operational - Water and Wastewater**

Import csv Default Undo

Land Use Subtype	Size Metric	Indoor Water Use (gals/year)	Outdoor Water Use (gals/year)	Electricity Intensity Factor To Supply (kWhr/Mgal)	Electricity Intensity Factor To Treat (kWhr/Mgal)	Electricity Intensity Factor To Distribute (kWhr/Mgal)	Electricity Intensity Factor For Wastewater Treatment (kWhr/Mgal)	Septic Tank (%)	Aerobic (%)	Facultative Lagoons (%)	Anaerobic Digester with Combustion of Digester Gas (%)	Anaerobic Digestion with Cogeneration from Combustion of Digester Gas (%)
▶ Apartments Low Rise	Dwelling Unit	13,030...	8,215,...	9,727	111	1,272	1,911	10.33	87.46	2.21	100	0
Parking Lot	1000sqft	0	0	9,727	111	1,272	1,911	10.33	87.46	2.21	100	0
Quality Restaurant	1000sqft	1,517,...	96,872...	9,727	111	1,272	1,911	10.33	87.46	2.21	100	0
Supermarket	1000sqft	5,547,...	171,55...	9,727	111	1,272	1,911	10.33	87.46	2.21	100	0

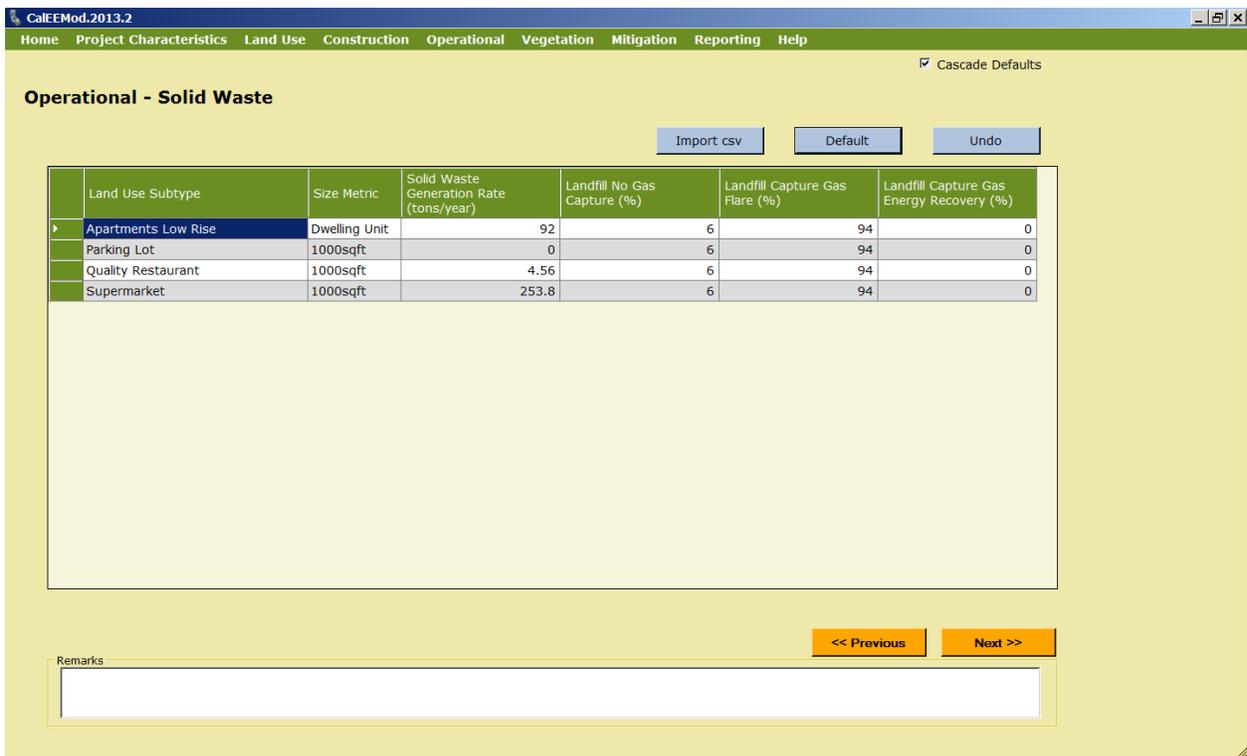
Remarks

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<sup>11</sup> CEC-500-2006-118.

## 4.8 Solid Waste

The solid waste module determines the GHG emissions associated with disposal of solid waste into landfills. In order to estimate the eventual contribution of GHG emissions from solid waste for the waste disposed by a land use annually, the total amount of carbon dioxide and methane that would be evolved over the span of many years is calculated. This is based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste<sup>12</sup>. Waste disposal rates by land use and overall composition of municipal solid waste in California was primarily based on Calrecycle data. The amount of methane emitted depends on characteristics of the landfill, and therefore the default percentage is based on the types of landfills assumed by ARB in their GHG emission inventories. Portions of these emissions are biogenic. The defaults for the gas capture (e.g., no capture, flaring, energy recovery) are statewide averages, but the user has the ability to override the defaults if the gas capture is known. Local jurisdictions can also provide guidance to users as to what default properly reflects known regional solid waste gas capture. Users in the Santa Barbara region are recommended to apply 100% landfill capture gas flare overriding the statewide default to reflect a more accurate regional solid waste activity.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

**Operational - Solid Waste**

Import csv Default Undo

Land Use Subtype	Size Metric	Solid Waste Generation Rate (tons/year)	Landfill No Gas Capture (%)	Landfill Capture Gas Flare (%)	Landfill Capture Gas Energy Recovery (%)
▶ Apartments Low Rise	Dwelling Unit	92	6	94	0
Parking Lot	1000sqft	0	6	94	0
Quality Restaurant	1000sqft	4.56	6	94	0
Supermarket	1000sqft	253.8	6	94	0

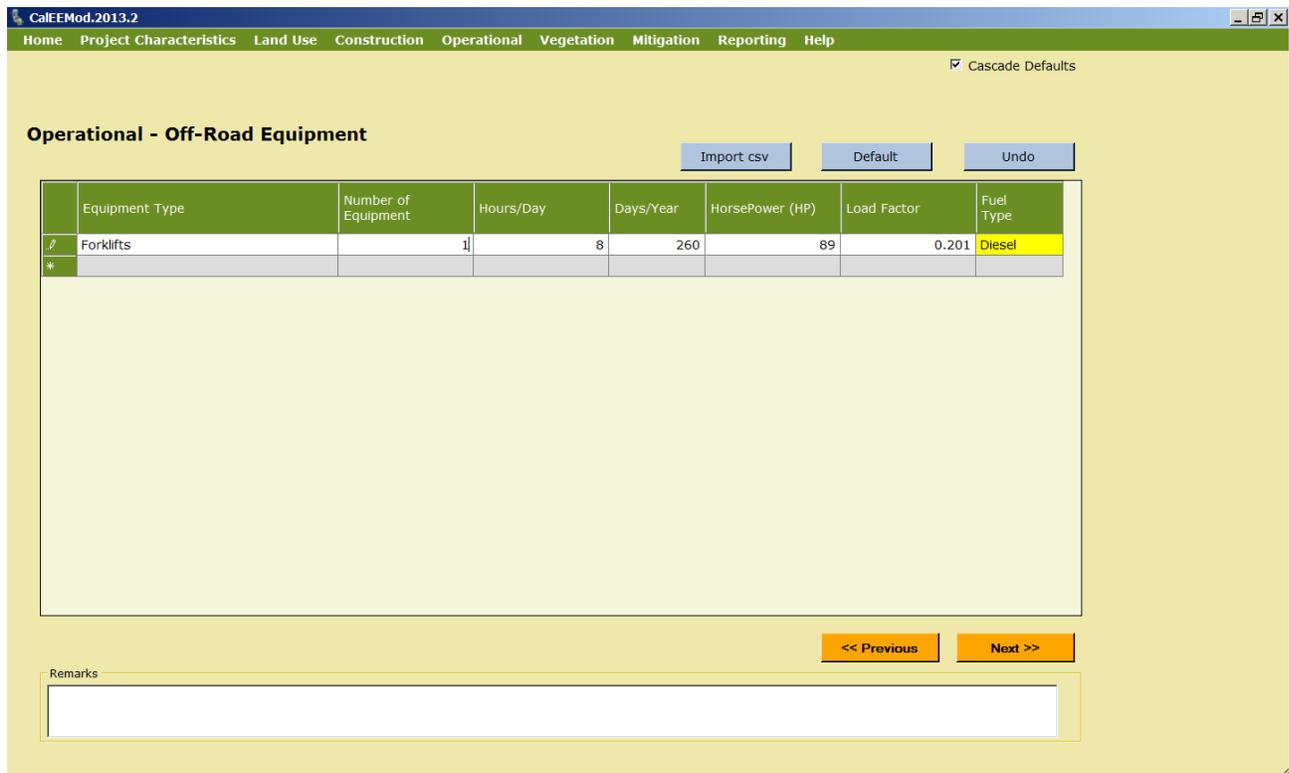
Remarks

<< Previous Next >>

12 IPCC. 2006. 2006 IPCC Guidelines for National Greenhouse Gas Inventories. Volume 5 Waste.

## 4.9 Off-Road Equipment

A new sub-screen under Operational allows the user to identify any off-road equipment used during operational activities (e.g., forklifts, cranes, loaders, generator sets, pumps, pressure washers, etc.) at the project site. Because such equipment cannot be assumed to be needed for a particular land use project, a user needs to provide the input in order for CalEEMod to calculate the resulting emissions from equipment operation. A dropdown list of off-road equipment is provided for the user to identify each piece of equipment. The model requires the following specific information per equipment type. The user would need to provide the number of pieces for each equipment type. The model assumes an operation activity of 8 hours per day and 260 days per year, as well as the horsepower and load factor of the equipment type, but the user has the ability to override the default assumptions with project specific information. Finally, the model assumes diesel fuel, but a dropdown menu is provided to allow the user to choose bio-diesel or compressed natural gas (CNG) if known to power the equipment.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

**Operational - Off-Road Equipment**

Import csv Default Undo

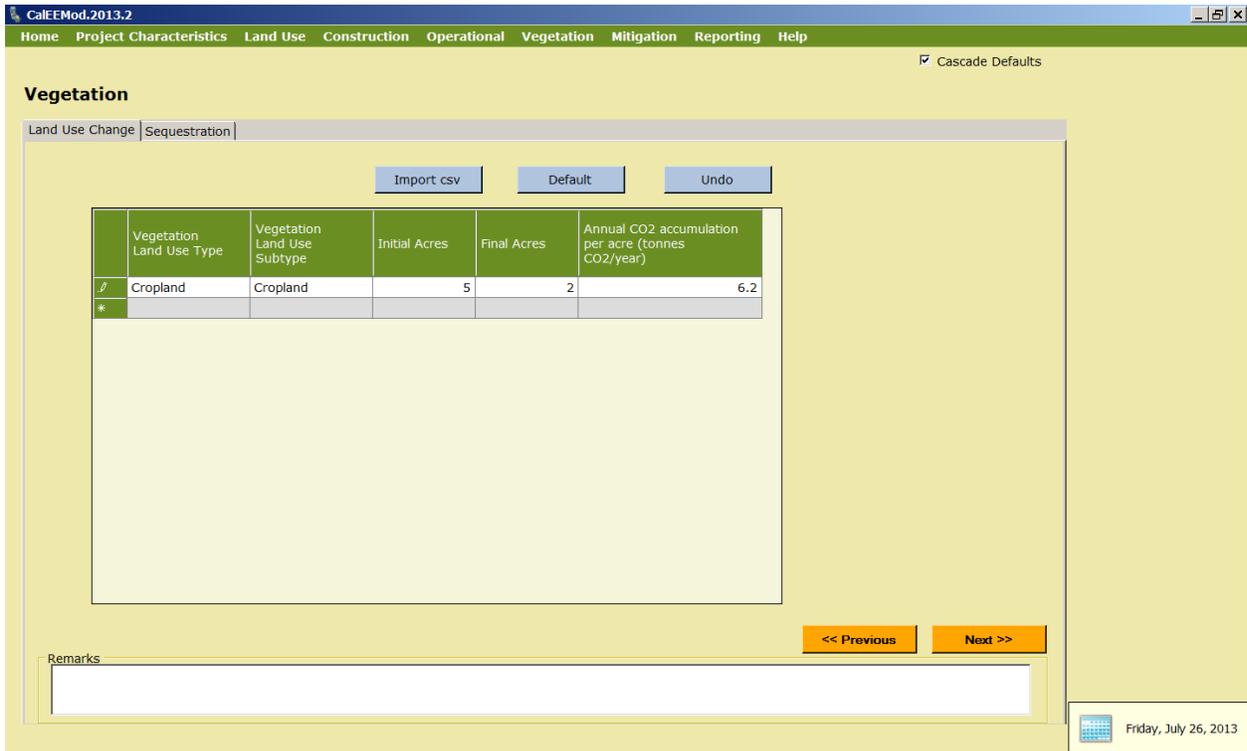
	Equipment Type	Number of Equipment	Hours/Day	Days/Year	HorsePower (HP)	Load Factor	Fuel Type
⌵	Forklifts	1	8	260	89	0.201	Diesel
*							

<< Previous Next >>

Remarks

## 4.10 Vegetation

The vegetation module is used to estimate the one-time change in carbon sequestration capacity of a vegetation land use type. The methods used are based on IPCC<sup>13</sup>. The user enters the vegetation land use type, the initial and final acreage of the vegetation land use type, and the annual carbon dioxide equivalent accumulation per acre if the user chooses to over ride the default value. Settlement land use acreage is not considered since it is a net zero at steady state unless trees are added.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

**Vegetation**

Land Use Change | Sequestration

Import csv Default Undo

	Vegetation Land Use Type	Vegetation Land Use Subtype	Initial Acres	Final Acres	Annual CO2 accumulation per acre (tonnes CO2/year)
/	Cropland	Cropland	5	2	6.2
*					

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Remarks

Friday, July 26, 2013

### 4.10.1 Sequestration

This subscreen to vegetation is used to estimate the GHG emissions associated with the sequestration of net new trees added to the project site. Consistent with IPCC recommendations a 20 year active growth period is assumed. The user enters the tree type or miscellaneous if it is not known, and the total number of trees. The user can override the default carbon sequestration rate.

### 4.11 Mitigation

The mitigation module screen consists of six subscreens that the user can indicate and supply the necessary information to estimate the emissions after mitigation measures have been implemented. The mitigation measures included in CalEEMod are largely based on the recent

<sup>13</sup> IPCC. 2006. 2006 IPCC Guidelines for National Greenhouse Gas Inventories Volume 4.



CAPCOA Quantifying Greenhouse Gas Mitigation Measures (<http://www.capcoa.org/wp-content/uploads/downloads/2010/09/CAPCOA-Quantification-Report-9-14-Final.pdf>) document.

To assist the user in understanding each measure by referencing back to the CAPCOA document, the CAPCOA measure numbers are provided next to the listed measures in CalEEMod. Therefore, this user's guide focuses on key aspects of the program screens that user's should pay attention to.

### 4.11.1 Construction Mitigation

This screen consists of a datagrid to apply mitigation to off-road construction equipment and check boxes with supplemental information for fugitive dust emissions.

To apply mitigation to construction equipment, the user selects the equipment type the number of equipment noting the total number displayed based on construction equipment lists, and type of mitigation to apply. If substantial evidence supporting reductions was available at the time of development, options include fuel type (diesel, CNG, electric, hybrid, biodiesel), engine tier (typically will select Tier 4), diesel particulate filter tiers (Tier 3 being the best), and oxidative catalyst reduction. The program estimates how much if any increase or decrease in emissions to apply for each pollutant. Some mitigation measures have trade-offs in pollutant reductions and therefore may result in increases of some pollutants.

The screenshot shows the 'Mitigation' screen in CalEEMod 2013.2. The 'Construction' tab is selected. Below the navigation tabs, there are buttons for 'Import csv', 'Default', and 'Undo'. A table lists various off-road equipment types with columns for Fuel Type, Engine Tier, Number of Equipments, Total Number of Offroad, DPF Level, and Using Oxidation Catalyst. Below the table, there are sections for 'Fugitive Dust' with checkboxes and input fields for 'Soil Stabilizer for Unpaved Roads', 'Water Exposed Area', 'Unpaved Road Mitigation', 'Replace Ground Cover of Area Disturbed', and 'Clean Paved Road'. At the bottom, there is a 'Remarks' text area and navigation buttons for '<< Previous' and 'Next >>'. A note at the bottom states: '\*The mitigation should be applicable to land use project evaluated. \*Remarks\* box should contain percent reduction justification.'

Equipment Type	Fuel Type	Engine Tier	Number Of Equipments	Total Number Of Offroad	DPF Level	Using Oxidation Catalyst
Air Compressors	Diesel	No Change	0	1	No Change	0
Cement and Mortar Mixers	Diesel	No Change	0	1	No Change	0
Concrete/Industrial Saws	Diesel	No Change	0	1	No Change	0
Cranes	Diesel	No Change	0	1	No Change	0
Forklifts	Diesel	No Change	0	2	No Change	0
Generator Sets	Diesel	No Change	0	1	No Change	0
Graders	Diesel	No Change	0	2	No Change	0

To apply mitigation to fugitive dust from construction, the user selects the check box in front of the mitigation measure name, and enters in the appropriate information in the drop down or text

boxes. Some fugitive dust mitigation required by some districts do not appear here since the fugitive dust source they mitigate is not quantified by CalEEMod in particular this includes fugitive dust generated by wind over land and storage piles. Since they are not quantified it is not appropriate to apply the reduction. The construction mitigation to use alternative fuel for construction equipment is consistent with the mitigation number C-1 in the CAPCOA Quantifying GHG Mitigation document.

#### 4.11.2 Traffic Mitigation

There are two traffic mitigation subscreens that the user can select from. First the user must select the Project Setting as defined in the CAPCOA document (pages 59-60).

- Low Density Suburban: An area characterized by dispersed, low-density, single-use, automobile dependent land use patterns, usually outside of the central city (a suburb).
- Suburban Center: serves the population of the suburb with office, retail and housing which is denser than the surrounding suburb.
- Urban: an area which is located within the central city with higher density of land uses than you would find in the suburbs. It may be characterized by multi-family housing and located near office and retail.
- Urban Center (*known as "Compact Infill" in CAPCOA document*) : A project which is located within or contiguous with the central city. Examples may include redevelopment areas, abandoned sites, or underutilized older buildings/sites.

If the CAPCOA measure did not distinguish between suburban center and low density suburban, values for low density suburban were used. Similarly, if urban center and urban values were not distinguished urban values were used.

The user checks the box next to each mitigation measure and fills in the appropriate information as required. The maximum reduction caps defined in the CAPCOA Quantifying GHG Mitigation document are integrated into these calculations. The CAPCOA traffic mitigation measure numbers included in CalEEMod are the following: LUT-1, LUT-3, LUT-9, LUT-4, LUT-5, LUT-6, SDT-1, SDT-2, SDT-3, PDT-1, PDT-2, PDT-3, TST-1, TST-3, TST-4, TRT-1, TRT-2, TRT-4, TRT-15, TRT-14, TRT-6, TRT-7, TRT-11, TRT-3, and TRT-13. The NEV network mitigation measure assumes the low end of the CAPCOA recommendations.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

☑ Cascade Defaults

### Mitigation

Construction Traffic Area Energy Water Solid Waste

Land Use & Site Enhancement Commute

Project Setting

\*The mitigation should be applicable to land use project evaluated.  
"Remarks" box should contain percent reduction justification.

**Land Use**

Increase Density [LUT-1]  Dwelling Units/acre  
 Jobs/Job acre

Increase Diversity [LUT-3]

Improve Walkability Design [LUT-9]  
Intersections/Square Miles

Improve Destination Accessibility [LUT-4]  
Distance to Dwtwn/Job Ctr (Miles)

Increase Transit Accessibility [LUT-5]  
Distance to Transit Station (Miles)

Integrate Below Market Rate Housing [LUT-6]  
#Dwelling Units Below Market Rate

**Neighborhood Enhancements**

Improve Pedestrian Network [SDT-1]

Provide Traffic Calming Measures [SDT-2]  
% Streets with Improvement

% Intersections with Improvement

Implement NEV Network [SDT-3]

**Parking Policy/Pricing**

Limit Parking Supply [PDT-1]  
% Reduction in Spaces

Unbundle Parking Costs [PDT-2]  
Monthly Parking Cost (\$)

On-Street Market Pricing [PDT-3]  
% Increase in Price

**Transit Improvement**

Provide BRT System [TST-1]  
% Lines BRT

Expand Transit Network [TST-3]  
% Increase Transit Coverage

Increase Transit Frequency [TST-4]  
Level of Implementation

% Reduction in Headways

Remarks

CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

☑ Cascade Defaults

### Mitigation

Construction Traffic Area Energy Water Solid Waste

Land Use & Site Enhancement Commute

Commute Trip

Implement Trip Reduction Program [TRT-1, TRT-2]  
% employee eligible   
Program Type

Transit Subsidy [TRT-4]  
% employee eligible   
Daily Transit Subsidy Amount (\$)

Implement Employee Parking "Cash-Out" [TRT-15]  
% employee eligible

Workplace Parking Charge [TRT-14]  
% employee eligible   
Daily Parking Charge (\$)

**School Trip**

Implement School Bus Program [TRT-13]  
% family using

Encourage Telecommuting and Alternative Work schedules [TRT-6]  
% employee work 9/80   
% employee work 4/40   
% employee telecommute 1.5 days

Market Commute Trip Reduction Option [TRT-7]  
% employee eligible

Employee Vanpool/Shuttle [TRT-11]  
% employee eligible   
% vanpool mode share

Provide Ride Sharing Program [TRT-3]  
% employee eligible

\*The mitigation should be applicable to land use project evaluated.  
"Remarks" box should contain percent reduction justification.

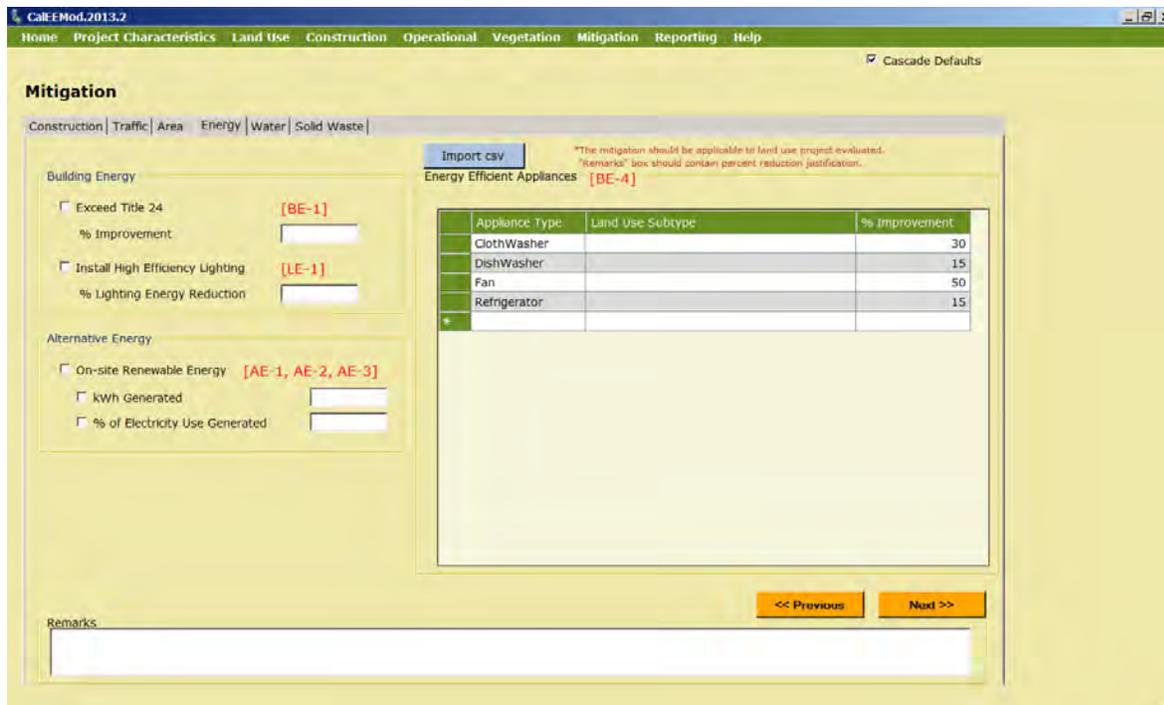
Remarks

### 4.11.3 Area Mitigation

The user can select from a few area source mitigation measures by checking the appropriate box and supplying any additional information in the text boxes. These measures include all natural gas hearths, no hearths, electric landscaping equipment use, reduced VOC coatings, and reduced consumer product VOC content. The area landscaping mitigation to prohibit gas powered landscape equipment is consistent with the mitigation number A-1 in the CAPCOA Quantifying GHG Mitigation document.

### 4.11.4 Energy Mitigation

The user selects energy mitigation measures by using check boxes or a datagrid. These correspond to CAPCOA Mitigation Measures LE-1, BE-1, AE-1, AE-2, AE-3 and BE-4 as listed in the CAPCOA Quantifying GHG Mitigation document. The lighting is a percentage reduction in lighting as supplied by the user. The datagrid is used to enter the land use subtypes that will use energy efficient appliances. The percent improvement is the typical percent improvement above standard appliances according to the 2008 Energy Star Annual Report<sup>14</sup>. Alternative Energy has two methods to enter the amount of alternative energy. The first is the amount of kWh generated. The second is the percentage of the total electricity use by buildings that is generated. At this time alternative energy methods that are not carbon neutral are not quantified. To apply the amount of alternative energy only one of the two methods (kWhr or percentage) needs to be entered for CalEEMod to calculate emission reductions.



CalEEMod.2013.2

Home Project Characteristics Land Use Construction Operational Vegetation Mitigation Reporting Help

Cascade Defaults

### Mitigation

Construction | Traffic | Area | Energy | Water | Solid Waste

Import csv \*\*The mitigation should be applicable to land use project evaluated.  
\*Remarks\* box should contain percent reduction justification.

Building Energy

Exceed Title 24 [BE-1]  
% Improvement

Install High Efficiency Lighting [LE-1]  
% Lighting Energy Reduction

Alternative Energy

On-site Renewable Energy [AE-1, AE-2, AE-3]  
 kWh Generated   
 % of Electricity Use Generated

Energy Efficient Appliances [BE-4]

Appliance Type	Land Use Subtype	% Improvement
ClothWasher		30
DishWasher		15
Fan		50
Refrigerator		15
+		

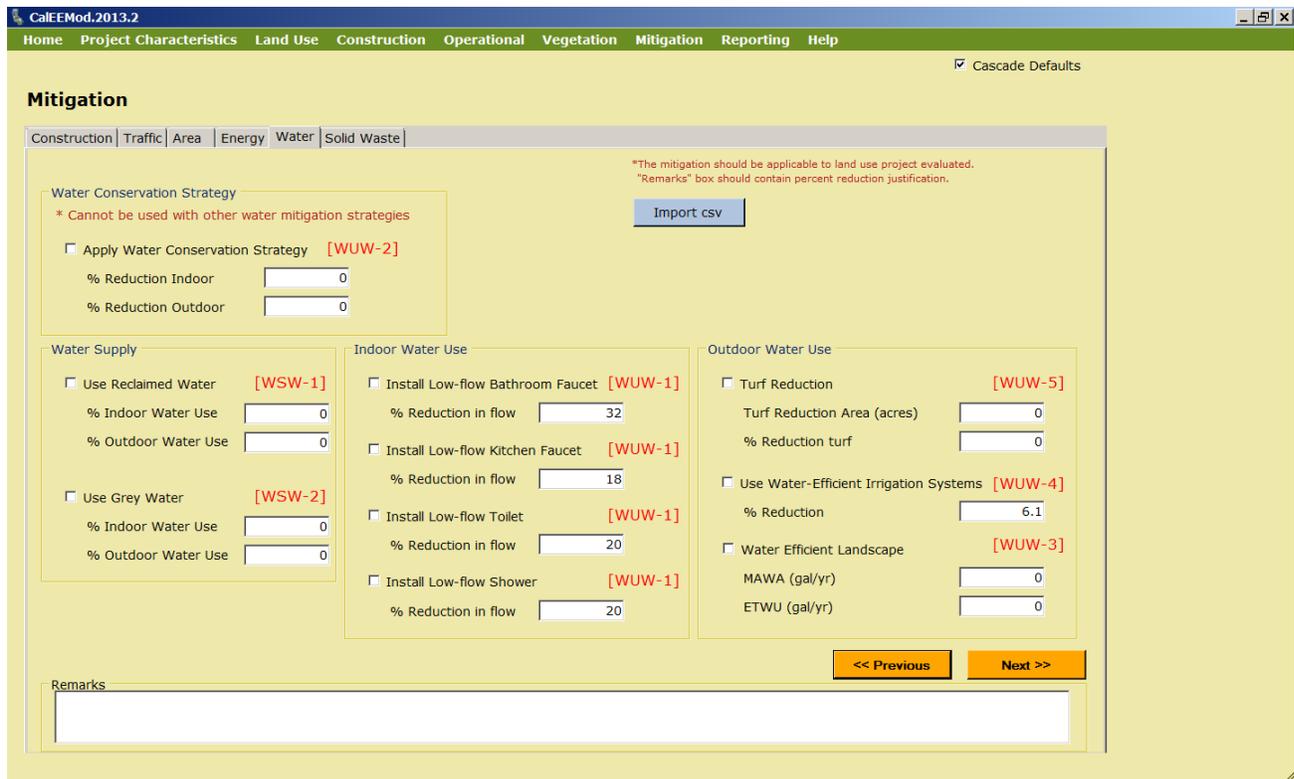
Remarks

<< Previous Next >>

14 Available at <http://www.epa.gov/cpd/annualreports/annualreports.htm>

### 4.11.5 Water Mitigation

Water mitigation can either be estimated as the percent reduction based on a water conservation strategy or the other individual mitigation measures. The CAPCOA Quantifying GHG Mitigation document includes water supply and use measures WSW-1 & 2, WUW-1 through 5. For CAPCOA Mitigation Measure WSW-3 (Use Locally Sourced Water Supply), using locally-sourced water or water from less energy-intensive sources reduces the electricity and indirect CO<sub>2</sub> emissions associated with water supply and transport because water from local or nearby groundwater basins, nearby surface water and gravity-dominated systems have smaller energy-intensity factors. Therefore, for WSW-3, the user should alter the energy intensity values in water and run a separate CalEEMod run to accommodate these values.



The screenshot shows the 'Mitigation' section of the CalEEMod 2013.2 software. The 'Water' tab is selected, and the 'Water Conservation Strategy' section is active. A note states: '\* Cannot be used with other water mitigation strategies'. Below this, there are three main categories of mitigation measures:

- Water Conservation Strategy [WUW-2]:**
  - Apply Water Conservation Strategy [WUW-2]
  - % Reduction Indoor:
  - % Reduction Outdoor:
- Water Supply:**
  - Use Reclaimed Water [WSW-1]
    - % Indoor Water Use:
    - % Outdoor Water Use:
  - Use Grey Water [WSW-2]
    - % Indoor Water Use:
    - % Outdoor Water Use:
- Indoor Water Use:**
  - Install Low-flow Bathroom Faucet [WUW-1]
    - % Reduction in flow:
  - Install Low-flow Kitchen Faucet [WUW-1]
    - % Reduction in flow:
  - Install Low-flow Toilet [WUW-1]
    - % Reduction in flow:
  - Install Low-flow Shower [WUW-1]
    - % Reduction in flow:
- Outdoor Water Use:**
  - Turf Reduction [WUW-5]
    - Turf Reduction Area (acres):
    - % Reduction turf:
  - Use Water-Efficient Irrigation Systems [WUW-4]
    - % Reduction:
  - Water Efficient Landscape [WUW-3]
    - MAWA (gal/yr):
    - ETWU (gal/yr):

At the bottom, there is a 'Remarks' text area and navigation buttons for '<< Previous' and 'Next >>'. An 'Import csv' button is also present in the top right of the mitigation section.

### 4.11.6 Solid Waste Mitigation

The user can get a reduction for recycling waste. This mitigation measure corresponds to CAPCOA Mitigation Measure: SW-1.

## 4.12 Reporting

The user initiates final calculations by selecting the report and clicking on the button. The available reports include: Annual, Summer (peak) Daily, Winter (peak) Daily and Mitigation. A separate report viewer will come up. From this report viewer, the user can view their report on-screen, print reports, save as Microsoft excel file or save as a pdf file, or in the case of the Mitigation report, a Microsoft doc file. The data in the excel file has already been calculated and placed in the grids as text, thus, for example, one cannot change an emission value and expect the report to change the summed total value. These values, however, can be copied to new excel spreadsheet for any further desired calculation with the data.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RESEARCH TRIANGLE PARK, NC 27711

APR 11 2011

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

**MEMORANDUM**

SUBJECT: AERSCREEN Released as the EPA Recommended Screening Model

FROM: Tyler Fox, Leader   
Air Quality Modeling Group, C439-01

TO: EPA Regional Modeling Contacts

**INTRODUCTION**

In August 2010, EPA released a beta version of AERSCREEN with draft user's guide and test cases, taking public comment until September 30, 2010. These comments ranged from "bug" fixes to suggested AERSCREEN enhancements. After incorporating "bug" fixes and user comments, EPA released version 11060 of AERSCREEN on March 11, 2010 with a subsequent update, version 11076, on March 17, 2010. Version 11076 corrected an error found in version 11060. The release package includes AERSCREEN (Fortran source code and executable), a User's Guide, the MAKEMET meteorological data generator, and AERSCREEN test cases. AERSCREEN uses the AERMOD executable, ensuring consistency with the refined model, and also utilizes the BPIPPRM building processor and AERMAP terrain preprocessor as needed to account for building downwash and terrain effects. AERSCREEN can be found on the Support Center for Regulatory Atmospheric Modeling (SCRAM) website:  
[http://www.epa.gov/ttn/scram/dispersion\\_screening.htm#aerscreen](http://www.epa.gov/ttn/scram/dispersion_screening.htm#aerscreen)

**RECOMMENDATION OF AERSCREEN AS SCREENING MODEL**

The recommended simple terrain screening model in *The Guideline on Air Quality Models (Guideline)*, published as Appendix W to 40 CFR Part 51) has been SCREEN3. However, AERSCREEN (the single source screening version of AERMOD) is now available as a full release or non-beta version. This memorandum clarifies the replacement of SCREEN3 with AERSCREEN as the recommended screening model.

With respect to AERSCREEN replacing SCREEN3, the preamble of the 2005 rule promulgating AERMOD as the preferred *Guideline* model for a wide range of regulatory applications in all types of terrain states (See 70 FR at 68221):

“With respect to a screening version of AERMOD, a tool called AERSCREEN is being developed with a beta version expected to be publicly available in Fall 2005. SCREEN3 is the current screening model in the *Guideline*, and since SCREEN3 has been successfully applied for a number of years, we believe that SCREEN3 produces an acceptable degree of conservatism for regulatory applications and may be used until AERSCREEN or a similar technique becomes available and tested for general application.”

This language clearly implies that AERSCREEN will become the recommended screening model once it is released. In addition, since AERSCREEN is the screening version of AERMOD, EPA’s preferred model for near-field dispersion, it follows that AERSCREEN would become the recommended screening model once available. The SCREEN3 model is essentially a screening version of the ISCST3 model, which was replaced by AERMOD, and is subject to the same limitations as ISCST3.

Similar to SCREEN3, AERSCREEN allows for user entry of emission inputs, source coordinates, building information (for downwash), receptor information, and meteorological information in a quick and easy fashion, either through an input file, or interactive prompts. However, AERSCREEN incorporates several enhancements relative to the SCREEN3 model. For example, AERSCREEN generates application-specific worst-case meteorology, via MAKEMET, that takes full advantage of the boundary layer scaling algorithms implemented in the AERMET meteorological processor using representative minimum and maximum ambient air temperatures, and site-specific surface characteristics (albedo, Bowen ratio, and surface roughness). AERSCREEN incorporates the PRIME downwash algorithms that are part of the AERMOD refined model and utilizes the BPIPPRIM tool to provide a detailed analysis of downwash influences on a direction-specific basis. AERSCREEN also incorporates AERMOD’s complex terrain algorithms and utilizes the AERMAP terrain processor to account for the actual terrain in the vicinity of the source on a direction-specific basis.

The question has also arisen about the role of screening modeling and refined dispersion modeling under Appendix W. Section 2.2 of the *Guideline*, explains that:

“[t]he purpose of such [screening] techniques is to eliminate the need of more detailed modeling for those sources that clearly will not cause or contribute to ambient concentrations in excess of either the National Ambient Air Quality Standards (NAAQS) or the allowable prevention of significant deterioration (PSD) concentration increments. If a screening technique indicates that the concentration contributed by the source exceeds the PSD increment or the increment remaining to just meet the NAAQS, then the second level of more sophisticated models should be applied.”

In recent years, the use of screening models has been largely replaced with refined dispersion modeling because of advancements in computing power and the wider availability of

representative meteorological data that are needed to apply refined models. In this context, the primary regulatory purpose for application of a screening model would be to determine whether site-specific meteorological data would be required for a proposed source if no other representative meteorological data are readily available. However, a screening model such as AERSCREEN can also be a useful tool to estimate potential impacts during the design and planning stages of a project.

## **SUMMARY**

In summary,

- AERSCREEN has been released and is available on the SCRAM web site.
- AERSCREEN is based on AERMOD, EPA's preferred near-field dispersion model, and replaces SCREEN3 as the recommended screening model based on the *Guideline on Air Quality Models*.

If there are any questions regarding AERSCREEN, please contact James Thurman of EPA's Air Quality Modeling Group at (919) 541-2703 or [thurman.james@epa.gov](mailto:thurman.james@epa.gov).

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# Health Risk Assessments for Proposed Land Use Projects



## CAPCOA Guidance Document



Prepared by:  
CAPCOA Planning Managers

Approved for Release  
July 2009

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## Glossary

Acute Hazard Index	Acute Hazard Index is the ratio of the average short term (generally one hour) ambient concentration of an acutely toxic substance(s) divided by the acute reference exposure level set by the Office of Environmental Health Hazard Assessment. If this ratio is above one, then adverse health effects may occur.
Background Risk	Background risk is the risk level found throughout an area. This risk is not caused by a particular facility; it is the cumulative risk and may be partly due to air pollution from vehicle traffic.
Cancer Risk	Cancer risk is defined as the probability that an individual will contract cancer usually expressed as so many chances per million persons exposed to a specified concentration of carcinogenic substance(s).
Chronic Hazard Index	Chronic Hazard Index is the ratio of the average annual ambient concentration of a chronically toxic substance(s) divided by the chronic reference exposure level set by the Office of Environmental Health Hazard Assessment. If this ratio is above one, then adverse health effects may occur.
Commenting Agency	A commenting agency is any public agency that comments on a CEQA document, but is neither a lead agency nor a responsible agency. For example, a local air district, as the agency with the responsibility for air pollution control, could review and comment on an air quality analysis in a CEQA document, even though the project was not subject to an air permit or other air pollution control requirements.
Cumulative impact	Cumulative impacts represent the risks from all onsite sources and from sources near enough to the project to significantly contribute to the total risk levels.
Hot Spots Program	Health and Safety Code §44300-44394, Program which requires existing sources to inventory toxic emissions, prepare risk assessments, notify significantly exposed receptors, and prepare and implement risk reduction plans.
Lead Agency	A lead agency is the public agency that has the principal responsibility for carrying out or approving a project that is subject to CEQA. In general, the land use agency is the preferred public agency serving as lead agency, because it has jurisdiction over general land uses. The lead agency is responsible for determining the appropriate environmental document, as well as its preparation.

Receptors	Receptors include sensitive receptors and worker receptors. Sensitive receptors refer to those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality). Land uses where sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (these sensitive land uses may also be referred to as sensitive receptors). Worker receptors refer to employees and locations where people work.
Responsible Agency	A responsible agency is a public agency, other than the lead agency, with discretionary approval authority over a project that is subject to CEQA (i.e., project requires a subsequent permit).
Risk Assessment	An evaluation that assesses the impact of toxic substances affecting receptors. A risk assessment can include minimal input parameters resulting in conservative results (screening risk assessment) or include increasingly detailed input parameters (refined risk assessment).
Source	A source is referred to as the locality where toxic emissions originate and are released into the atmosphere. Sources of emissions are categorized into groups such as point source (e.g., refinery) or line source (e.g., roadway).
Type A Project	Land use project that impacts receptors near the project.
Type B Project	Land use project with receptors that are impacted by nearby, existing toxics sources.

## **Acronyms**

ARB:	California Air Resources Board
ATCM:	Air Toxic Control Measure
CAPCOA:	California Air Pollution Control Officers Association
CEQA:	California Environmental Quality Act
DPM:	Diesel Particulate Matter
EIR:	Environmental Impact Report
EPA:	U.S. Environmental Protection Agency
HRA:	Health Risk Assessment
OEHHA:	California Office of Environmental Health Hazard Assessment
PM:	Particulate Matter
REL:	Reference Exposure Level
TAC:	Toxic Air Contaminant
TBACT:	Toxic Best Available Control Technology



## Executive Summary

This guidance was prepared to assist Lead Agencies in complying with the requirements of the California Environmental Quality Act (CEQA)<sup>1</sup>. CEQA requires environmental impacts of a proposed project be identified, assessed, and avoided or mitigated (as possible) if these impacts are significant. To determine the impact of airborne toxic emissions [i.e., toxic air contaminants (TACs)] for CEQA purposes, health risk assessments must be prepared. This document describes when and how a health risk assessment should be prepared and what to do with the results.

In 2005, the California Air Resources Board (ARB) prepared the *Air Quality and Land Use Handbook: a Community Health Perspective* (ARB Handbook)<sup>2</sup>, to help readers understand the potential cancer risks from some common sources of toxic emissions such as:

- Freeways and High Traffic Volume Roads,
- Goods Distribution Centers,
- Rail Yards,
- Ports,
- Refineries,
- Chrome Platers,
- Dry Cleaners using Perchloroethylene, and
- Gasoline Dispensing Facilities.

The ARB Handbook identified the potential cancer risks at various distances from these sources and recommended buffer distances between those sources and receptors.

Recent air pollution studies have shown an association between respiratory and other non-cancer health effects and proximity to high traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California.

While local air districts have ample experience evaluating and mitigating toxic emissions from permitted stationary sources, most have limited experience preparing or reviewing risk assessments associated with multiple toxic sources or assessments for exhaust from mobile sources that are typically found when evaluating health risks to proposed land use projects.

In order to provide consistency to lead agencies, project proponents and the general public throughout the state, the California Air Pollution Control Officers Association (CAPCOA) formed a subcommittee composed of representatives from the Planning Managers Committee and the Toxic Risk Managers Committee to develop guidance on assessing the health risk impacts from and to proposed land use projects. This CAPCOA guidance document focuses on the acute, chronic, and cancer impacts of sources affected by CEQA. It also outlines the

<sup>1</sup> Title 14 California Code of Regulations, Chapter 3. Guidelines for Implementation of the California Environmental Quality Act.

<sup>2</sup> Air Quality and Land Use Handbook: a Community Health Perspective, CARB, April 2005, <http://www.arb.ca.gov/ch/handbook.pdf>

**Health Risk Assessments**  
for  
**Proposed Land Use Projects**

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recommended procedures to identify when a project should undergo further risk evaluation, how to conduct the health risk assessment (HRA), how to engage the public, what to do with the results from the HRA, and what mitigation measures may be appropriate for various land use projects. With respect to health risks associated with locating sensitive land uses in proximity to freeways and other high traffic roadways, HRA modeling may not thoroughly characterize all the health risk associated with nearby exposure to traffic generated pollutants.

This guidance does not include how risk assessments for construction projects should be addressed in CEQA. As this is intended to be a “living document”, the risks near construction projects are expected to be included at a later time as the toxic emissions from construction activities are better quantified. State risk assessment policy is likely to change to reflect current science, and therefore this document will need modification as this occurs.

## 1.0 Requirements to Evaluate Health Risks in CEQA

This guidance was prepared to assist Lead Agencies in complying with the requirements of the California Environmental Quality Act (CEQA)<sup>3</sup>. CEQA requires that environmental impacts of proposed projects be identified, assessed, avoided and/or mitigated (as possible) if the environmental impacts are significant.

Section 15126.2(a) requires the following: *“An Environmental Impact Report (EIR) shall identify and focus on the significant environmental effects of the proposed project. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced. Direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including commercial and residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the area affected. For example, an EIR on a subdivision astride an active fault line should identify as a significant effect the seismic hazard to future occupants of the subdivision. The subdivision would have the effect of attracting people to the location and exposing them to the hazards found there.”*

This language is included here to clearly show that risk assessments can be required for both projects that will impact nearby receptors (Type A), and projects that will be impacted by nearby sources (Type B).

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<sup>3</sup> Pub. Resources Code § 21067; 14 Cal. Code Regs., §§ 15150, 15367.

## 2.0 Overview of the Process

Figure 1 shows an overview of the proposed Health risk Assessment (HRA) process. There are basically two types of land use projects that have the potential to cause long-term public health risk impacts:

**Type A** - Land use projects with toxic emissions that impact receptors, and

**Type B** - Land use project that will place receptors in the vicinity of existing toxics sources.

**Type A** project examples (project impacts receptors):

- combustion related power plants,
- gasoline dispensing facilities,
- asphalt batch plants,
- warehouse distribution centers,
- quarry operations, and
- other stationary sources that emit toxic substances.

**Type B** project examples (project impacted by existing nearby toxic sources):

- residential, commercial, and institutional developments proposed to be located in the vicinity of existing toxic emission sources such as:
  - stationary sources,
  - high traffic roads
  - freeways,
  - rail yards, and
  - ports.

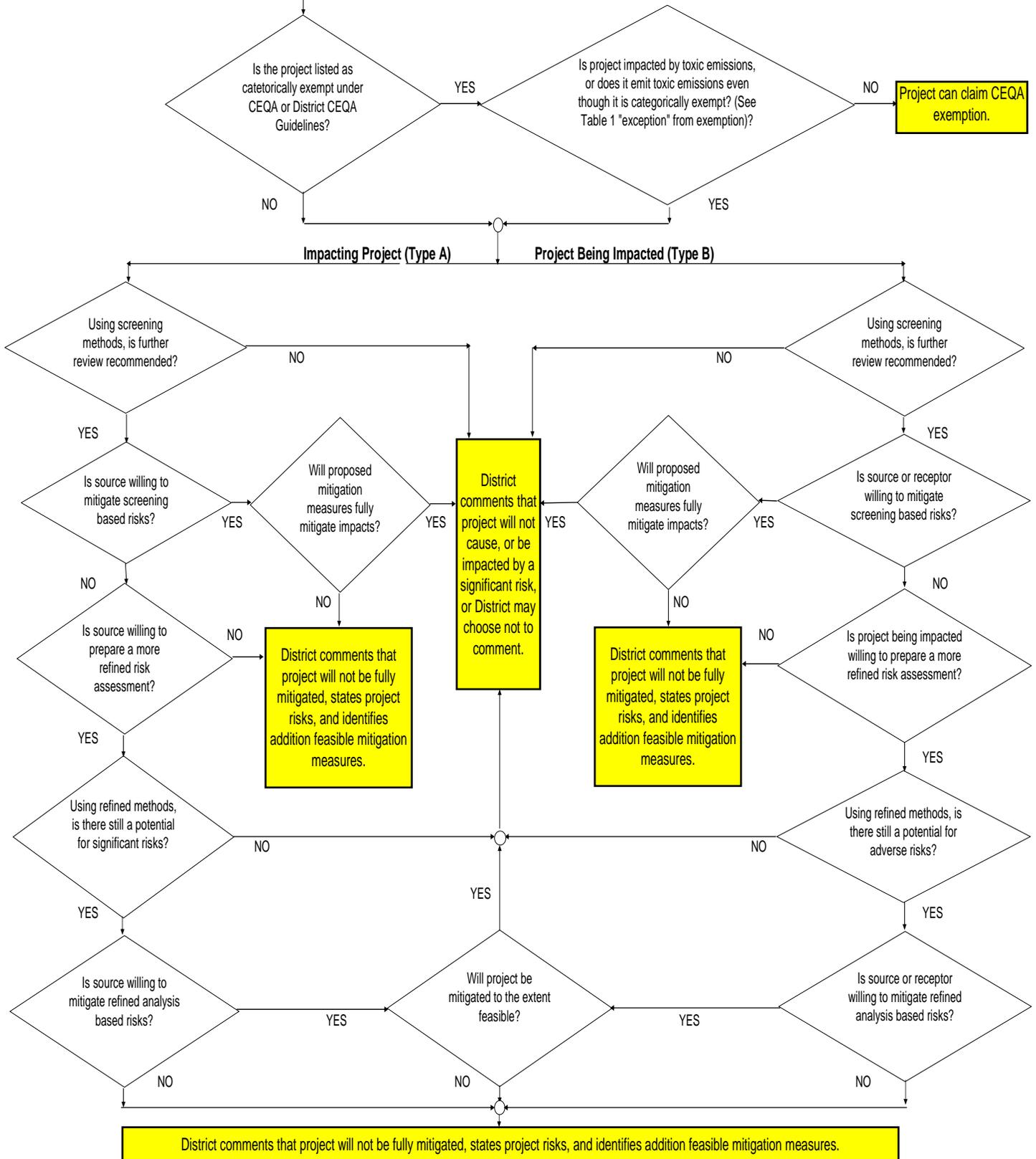
The flowchart (Figure 1) shows how to proceed with the CEQA process when either a Type A or Type B related project is proposed. The following summarizes the process for proceeding through the flowchart:

- First determine if the project is categorically exempt from CEQA;
- Next, determine if the project is impacting, or being impacted (Type A or B);
- Using screening methods, calculate acute, chronic, and cancer risk;
- If the screening analysis indicates significant health risk as defined by the lead agency, demonstrate that risks will be mitigated with all feasible measures even though a refined risk assessment may show that less mitigation is needed;
- Or, conduct a refined screening risk assessment; and,
- If the risk continues to be deemed significant by the lead agency even with the refined screening, demonstrate that the risks will be adequately mitigated with feasible measures.

Air districts, in their role as either a responsible agency or a commenting agency, should review the HRA and communicate to the lead agency their evaluation of the risk assessment and whether it is fully described (e.g., methodology, assumptions and resulting risk values) and mitigated with all feasible measures.

**Figure 1. Overview of Health Risk Assessment**

**Process for determining whether a risk assessment and mitigation is needed for projects subject to CEQA**  
Projects included are those that emits toxic substances that may impact the public, and projects that may be impacted by existing sources of toxic emissions .



### **3.0 Overview of Risk Assessment Methodology and Guidance Documents**

This document bases the risk assessment methodology on the procedures developed by the California Office of Environmental Health Hazard Assessment (OEHHA) to meet the mandates of the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588). The Hot Spots program applies to stationary sources and requires affected facilities to prepare a toxic emissions inventory, and if the emissions are significant, that a risk assessment be prepared. The OEHHA procedures can be found at [http://www.oehha.ca.gov/air/hot\\_spots/index.html](http://www.oehha.ca.gov/air/hot_spots/index.html) and describe:

- The toxicity factors associated with various substances,
- How these toxicity factor are to be used to determine the acute, chronic, and cancer risks associated with downwind concentrations of chemicals in the air at various receptors, and
- Dispersion modeling procedures.

## 4.0 CEQA Exemptions

The first step in a risk analysis is to determine if the project is statutorily or categorically exempt from CEQA. There are no exceptions to statutorily exempt projects, however, certain projects that are categorically exempt under the state or air district guidelines, may emit toxic emissions or may be impacted by existing toxic sources. Table 1 shows the exceptions from categorical exemptions where an HRA evaluation is needed. These are situations where a project proponent or lead agency may not rely on a categorical exemption because the health risk may trigger an exception (CEQA §15300.2), preventing their use. In such cases, a negative declaration or environmental impact report should be prepared.

**Table 1**  
**Categorical Exemptions Requiring HRA Evaluation<sup>4</sup>**

Categorical Exemption	Exempt Activity with <i>Possible Impact</i>
15301. Existing Facilities	This exemption also allows use of a single-family residence as a day care facility without CEQA review. <i>However, such uses near existing TAC emissions may warrant further review.</i>
15302. Replacement or Reconstruction	This exemption allows the replacement or construction of existing schools and hospitals in certain cases without CEQA review. <i>However, locating new facilities near existing TAC emissions may warrant further review.</i>
15303. New Construction or Conversion of Small Structures	This exemption class allows small new construction projects to proceed without CEQA review. <i>However, projects claiming this exemption should be reviewed for possible TAC impacts from ongoing nearby sources.</i>
15314. Minor Additions to Schools	This exemption class allows small school addition projects to proceed without CEQA review. <i>However, projects claiming this exemption should be reviewed for possible TAC impacts from ongoing nearby sources.</i>
15316. Transfer of Ownership of Land in Order to Create Parks	Exemptions in this class should be reviewed for <i>possible impacts from locating near ongoing sources of TAC.</i>
15332. In-Fill Development Projects.	This exemption class allows certain in-fill development projects to proceed without CEQA review. <i>However, projects claiming this exemption should be reviewed for possible TAC impacts from ongoing nearby sources such as high volume roadways and freeways.</i>

<sup>4</sup> Although methodology for assessing health risk for construction projects is not included in this document, lead agencies under CEQA are required to identify health risk from construction activities or projects and mitigate if they are deemed significant.

## 5.0 Screening Risk Assessments

Various tools already exist to perform a screening analysis from stationary sources impacting receptors (Type A projects) as developed for the AB2588 Hot Spots and air district permitting programs. Local air districts should be contacted for appropriate screening tools for proposed projects. Screening tools may include: prioritization charts, SCREEN3 and various spreadsheets.

For projects being impacted by existing sources (Type B projects), one screening tool is contained in the ARB Handbook<sup>4</sup>. The handbook includes a table (reproduced in these guidance documents as Table 2) with recommended buffer distances associated with various types of common sources. ARB's Handbook focuses on community health and provides important public health information to land use decision makers. In this document, ARB's primary goal is to provide information that will help keep California's children and other vulnerable populations out of harm's way with respect to nearby sources of air pollution.

For example, as shown in Table 2, ARB recommends avoiding siting new sensitive land uses such as residences, schools, daycare centers, playgrounds, or medical facilities within 500 feet of a freeway, urban roads with traffic volumes exceeding 100,000 vehicles/day, or rural roads with volumes greater than 50,000 vehicles/day. Therefore, siting a residential project within 500 feet of a freeway, and the associated public health risks, should be disclosed as such in a CEQA document. Re-designing the project so that sensitive receptors are moved greater than 500 feet away from such roadways may mitigate the risk. Other non-sensitive land uses such as commercial uses may be sited in this area. ARB recommends that their guidelines be considered by the decision makers along with housing needs, economic development priorities, and other quality of life issues. It should also be noted that health risk assessments conducted on sensitive land uses in close proximity to freeways and other high traffic roadways may not thoroughly characterize all the health risk associated with nearby exposure to traffic generated pollutants.

**Table 2**  
**Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities**<sup>5</sup>

Source Category	Advisory Recommendations
Freeways and high-traffic roads	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles per day.</li> </ul>
Distribution centers	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).</li> <li>Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.</li> </ul>
Rail yards	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.</li> <li>Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.</li> </ul>
Ports	<ul style="list-style-type: none"> <li>Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.</li> </ul>
Refineries	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.</li> </ul>
Chrome platers	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.</li> </ul>
Dry cleaners using perchloroethylene	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district.</li> <li>Do not site new sensitive land uses in the same building with perc dry cleaning operations.</li> </ul>
Gasoline dispensing facilities	<ul style="list-style-type: none"> <li>Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.</li> </ul>

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- These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.
- Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.
- The relative risk for these categories varies greatly. To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.
- These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to available health risk data (see individual category descriptions).
- Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.
- This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using Perchloroethylene that can be addressed with reasonable preventative actions.
- A summary of the basis for the distance recommendations can be found in the ARB Handbook.

## 6.0 Refined Risk Assessments

If a screening risk assessment shows that a risk is a concern, then a more refined analysis may be prepared. The refined analysis for the project may show lower risks, and provide more accurate information for decision makers. The screening assessment uses more conservative assumptions and thus gives higher risk than refined assessment. Risk assessments are normally prepared in a tiered manner, where progressively more input data is collected to refine the results. These guidelines include the evaluation of both mobile and stationary sources.

Attachment 1 to this document consists of the **Technical Modeling and Risk Assessment Guidance** which address various air quality dispersion modeling issues pertinent to California and is based primarily on information found in ARB, EPA and OEHHA guidance.

Appendix A, **Meteorological Data**, provides information on preparing meteorological data, mixing height and upper air data and land use characterization.

Appendix B, **Modeling and Exposure Assessment Input and Output Data**, is a checklist of parameters designed to provide an overview of all information that should be submitted for a refined air dispersion modeling assessment.

## 7.0 Risk Thresholds

An air district can set CEQA significant risk thresholds (e.g. the excess cancer risk shall be less than ten per million, the acute or chronic hazard index shall be less than one, or other significance levels as arrived at through a public process) that are used on a per-project basis. If the air district's governing board has adopted specific risk thresholds, the lead agency may choose to use them to determine acceptable risk levels. Additionally, clear risk thresholds are helpful when mitigation measures are necessary. The degree of mitigation can be clearly defined when a risk threshold has been determined before a project is proposed.

The absence of a risk threshold does not relieve an agency of its obligation to address toxic emissions from projects under CEQA. The implications of not having a threshold are different depending on the role the agency has under CEQA – whether it is acting as a commenting agency, as a responsible agency, or as a lead agency.

### *7.1 Significant Risk Thresholds - Type A (Impacting Sources)*

For Type A projects, those that generate toxic air contaminants (such as gasoline stations, distribution facilities or asphalt batch plants), air districts are uniform in their recommendation to use the significance thresholds that have been established under each district's "Hot Spots" and permitting programs. For the majority of the air districts the **excess cancer risk** significance threshold is set at **10 in a million**. For toxic air contaminants with acute and chronic, non-carcinogenic health effect, a **hazard index of one** must not be exceeded. Depending on the substances being emitted, a project with a hazard index greater than one could result in adverse health effects of various sorts. It should be noted that a hazard index exceeding one may need additional analysis to determine whether the acceptable level of acute or chronic risk could be higher depending upon the safety factors that were incorporated into the reference exposure levels (RELs) associated with the hazard index results. This additional analysis could be considered an additional refinement tier.

It should be noted that these thresholds may be applied differently for air district permitting, the Hot Spots program, and CEQA. For air district permitting, the thresholds apply only to individual permit units. For the Hot Spots program, the thresholds apply to the entire facility excluding vehicle emissions. Neither the permitting programs nor the Hot Spots program apply to vehicle emissions. For CEQA, the thresholds apply to all facilities including vehicle emissions, and road related emissions.

### *7.2 Significant Risk Thresholds - Type B (Projects Impacted by Existing Sources)*

For Type B projects, those that are impacted by existing sources, air districts are not uniform in their recommendation on what significance threshold should be adopted or what processes should be undertaken when disclosing potential risks.

The CEQA statutes encourage an air district or any lead agency to establish significance thresholds under CEQA for any pollutant. While there are considerations that support the establishment of thresholds, there is no obligation to do so. The absence of a threshold does not relieve agencies of their obligations to address toxic emissions from projects under CEQA. The implications of not having a threshold are different depending on the role the agency has under CEQA – whether it is acting in commenting agency, as a responsible agency, or as a lead agency.

An air district or other lead agency may elect not to establish significance thresholds for a number of reasons.

A lead agency or air district may also determine there is insufficient information to support selecting one specific threshold over another. Air districts have historically recommended CEQA thresholds for air pollutants in the context of the air district's clean air attainment plan, or (in the case of toxic air pollutants) within the framework of a rule or policy that manages risks and exposures due to toxic pollutants.

Significance levels have been approached differently by air districts as enumerated below:

- Thresholds can be based on a specific risk level such that a 10 per million excess cancer risk and an acute and chronic hazard index of one should not be exceeded. These thresholds tend to be consistent with the Hot Spot Program thresholds.
- Thresholds can also be based on the region's existing background cancer risk value if one exists.
  - One option is to establish a risk level equal to a region's background risk level.
  - Another option is to establish a risk level equal to twice a region's background risk level.
  - Still another option is to look at the ambient risk in the immediate vicinity of the project area rather than the regional risk level.
- Case by case thresholds may also be defined.

## 8.0 Mitigation Measures

CEQA requires that adverse environmental impacts of a proposed project be identified, assessed, avoided, and, if deemed significant, mitigated (as feasible) to a level that is considered less than significant. “Feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (CEQA Guidelines §15364).

In cases where significant adverse impacts are not avoided or substantially lessened, the public agency may approve the project if it first adopts a “statement of overriding considerations.” The statement of overriding considerations sets forth the specific reasons why the public agency found the project’s benefits outweigh its unavoidable adverse environmental effects (CEQA Guidelines §15043).

In addition to being a CEQA requirement, mitigating public exposure to toxic air pollution is needed to achieve air district goals. All potentially significant emission sources must be mitigated to the greatest extent feasible, including placing people out of harm’s way.

Table 3 presents mitigation measures that are currently considered to be feasible to reduce health risk from both Type A and Type B projects. The mitigation measures included in the table are not considered to be exhaustive. The lead agency and project proponents are encouraged to think creatively in devising measures to mitigate air quality impacts. However, the air districts recognize that the final determination of feasibility for a project will be determined by the lead agency. Aside from the mitigation measures shown below, knowing about the regulatory programs to reduce air pollutant emissions through statewide strategies provide information to local air districts and lead agencies to help assess and mitigate cumulative air pollution impacts as well.

### ***8.1 Mitigations due to Air Toxic Control Measures***

ARB has been developing Air Toxic Control Measures (ATCMs) for many years. Many of these measures have a phase-in schedule. Implementation of others has already been completed. While cancer and non-cancer risks from the air toxic sources implementing ATCMs are expected to decrease with time, the Office of Environmental Health Hazard Assessment (OEHHA) recommends that it is inappropriate to assume these yet-to-be realized emissions reductions in a health-risk assessment. However, the project proponent is encouraged to become familiar with existing and proposed ATCMs in order to determine if any of the ATCMs affect project-specific emissions.

### ***8.2 Mitigating Through Land Use and Design***

To a certain extent, the long-term air quality impact of a project is a function of its design. The layout of streets, the mix of land uses, and the placement of homes and businesses can all affect overall project emissions. Yet in many instances, the air quality impacts of a project are not considered until well after a project has been designed. At such a late stage, it can be very difficult to make any substantial changes to the project to reduce the project’s air quality impact.

As indicated throughout the ARB Handbook, land use agencies are strongly encouraged to consult early and often with local air districts. Including air quality considerations during the initial design phase can help an applicant to implement design features that will reduce its air quality impact.

In addition to considering the suitability of the project location, opportunities for mitigation of air pollution impacts through design should be considered. In some cases, control devices and changes in processes may be implemented at the source in order to reduce the risk from toxic air contaminant emissions. Examples of land-use based air quality specific performance standards include the following:

- Placing a process vent away from the direction of nearby receptors, or increasing the stack height so that emissions are dispersed to reduce the emissions impact on the immediate surroundings.
- Limiting the hours of operation of a facility to avoid excess emissions exposure to nearby individuals.
- An ordinance that requires fleet operators to use cleaner vehicles before project approval (if a new business), or when expanding the fleet (if an existing business).
- Providing alternate routes for truck operations that discourage detours into sensitive receptor neighborhoods.

While such measures may reduce the dimensions of a buffer zone, they do not obviate the need to maintain buffer zones to protect public health and safety. This is particularly true in situations where a sensitive receptor is encroaching on an existing source of toxic air contaminant. Also note disclosure statements, community alert procedures, etc., that are targeted at potential receptors are not appropriate mitigations to be used in lieu of buffer zones or technical controls.

Table 3 below contains examples of both project and program-level mitigation measures.

- Project-level mitigation measures are applicable to development which results in the implementation or modification of a land use which creates unacceptable levels of risk. Examples include redesigning the project to locate receptors away from TAC sources, the installation of barriers and/or vegetation and indoor air filtration.
- Program-level mitigation measures, on the other hand, are applicable to long-range community planning such as General Plans, and address land use incompatibility at a much earlier stage. Examples of program-level mitigation measures include rezoning vacant land adjacent to high-volume roadways, ports, railroads or heavy industry to avoid future proposed siting of residential and/or sensitive receptors.

### 8.3 *Mitigation Effectiveness*

The mitigation measures identified in Table 3 include both quantifiable and unquantifiable measures.

#### 8.3.1 **Quantifiable Mitigation Measures**

The effect of quantifiable mitigation measures can be modeled or calculated beyond a reasonable doubt. As pertaining to health risk impacts, quantifiable mitigation measures generally result in a measurable reduction of toxic air contaminant emissions (such as DPM), or a measurable decrease in exposure to such emissions through increased buffer distances, reduced exposure durations or control devices having a certified control effectiveness.

Examples of quantifiable mitigation measures include:

- Diesel particulate filters: as of 2008, DPFs reduce the emissions of diesel particulate matter up to 85% as verified by the CARB.
- Increasing the distance between a TAC source and receptor may reduce the receptor's level of exposure to TACs; the effect of this mitigation measure can be estimated through dispersion modeling;
- Idling restrictions can greatly reduce or completely eliminate DPM emissions from stationary trucks; if such restrictions are quantitative and include a concrete limit on the number of minutes a truck (or similar) is allowed to idle, the benefits of this mitigation measure can be modeled.

Several cautionary notes regarding estimating the effectiveness of mitigation measures are warranted:

- Clearly explain the assumptions underlying the environmental document's analysis of mitigation measure effectiveness. The analysis should specifically describe the mitigation measure, identify the source(s) of air pollutants that are expected to be affected by the measure, clearly explain how and to what extent the measure will affect the source(s), and identify the basis for the estimate (empirical observations, computer modeling, case studies, etc.). Critical assumptions should be linked to the mitigation monitoring and reporting program.
- Be specific regarding implementation of mitigation measures. The environmental document should describe each mitigation measure in detail, identify who is responsible for implementing the measure, and clearly explain how and when the measure will be implemented. Methods for assessing the measure's effectiveness once it is in place, and possible triggers for additional mitigation if necessary, may be needed. This level of detail regarding mitigation measure implementation frequently is not addressed until the preparation of the mitigation monitoring and reporting program, which often takes place very late in the environmental review process. In order to reliably assess the effectiveness and feasibility of mitigation

measures, however, air agencies believe it is necessary to consider the specifics of mitigation measure implementation as early in the environmental review process as possible.

- Be sure not to double count the effect of proposed mitigation measures. The project description and assumptions underlying the analysis of project impacts should be carefully considered when estimating the effect of mitigation measures. If certain conditions or behavior are assumed in the impact analysis, then credit may not be claimed when proposing mitigation measures.
- Health risk assessments discussed in this document estimate outdoor risk. While some mitigation measures may reduce risks by filtering outdoor air to be used indoors, they do nothing to reduce the risk assessment values for outdoor air.

### **8.3.2 Unquantifiable Mitigation Measures**

In some cases, it simply may not be possible to quantify the effect of proposed mitigation measures. It may be that the specific conditions surrounding a particular project are so unique as to render extrapolation from other examples unreliable. A proposed measure may be innovative, with little precedent. The combined effects of a package of measures may be too difficult to quantify. While a certain degree of professional judgment is usually involved in estimating the effectiveness of mitigation measures, speculative estimates should be avoided. If the project proponent cannot quantify mitigation effectiveness with a reasonable degree of certainty, the environmental document should at least address effectiveness qualitatively. If the lead-agency makes a finding that non-quantified mitigation measures reduce an impact to a level of insignificance, the document should provide a detailed justification of that conclusion.

#### ***8.3.2.1 Effects of Vegetation Next to Roadways***

The Sacramento Air District funded a study to measure the removal rates of particulate matter passing through leaves and needles of vegetation. Particles were generated in a wind tunnel and a static chamber and passed through vegetative layers at low wind velocities. Redwood, deodar cedar, live oak, and oleander were tested. The results from this study indicate that all forms of vegetation able to remove 65-85 percent of very fine particles at wind velocities below 1.5 meters per second (roughly 3 miles per hour) with redwood and deodar cedar being the most effective.

This study supports the effectiveness of planting finely needled trees along sources of toxic particulate matter as an air toxics mitigation measure. Though further studies that reflect actual roadway conditions are needed to better quantify the real-world effectiveness of this mitigation measure, projects that propose sensitive receptors adjacent to sources of particulate matter such as freeways, major roadways, rail lines, and rail

yards should consider tiered plantings of redwood and/or deodar cedar in order to reduce toxic exposures.

**8.3.2.2 No Idle Zone**

California law currently places restrictions on idling of heavy-duty diesel motor vehicles to reduce health risk impacts from diesel emissions. The 2003 school bus idling airborne toxic control measure (ATCM) requires a driver of a school bus or vehicle, transit bus, or other commercial motor vehicle to manually turn off the bus or vehicle engine upon arriving at a school and to restart no more than 30 seconds before departing. A driver of a school bus or vehicle is subject to the same requirement when operating within 100 feet of a school and is prohibited from idling more than five minutes at each stop beyond schools, such as parking or maintenance facilities, school bus stops, or school activity destinations.

California’s more recent anti-idling regulations (with some exemptions) require that drivers of diesel-fueled commercial vehicles weighing more than 10,000 pounds:

- Shall not idle the vehicle’s primary diesel engine for greater than 5 minutes at any location,
- Shall not use diesel-fueled auxiliary power units for more than 5 minutes to power a heater, air conditioner, or any ancillary equipment on the vehicle equipped with a sleeper berth, at any location.

Lead agencies may place additional requirements on heavy duty diesel delivery and haul trucks less than 10,000 pounds, and create “no idle” zones at locations where there is a potential for significant health risk. It may not be possible to quantify the emission reductions associated with the creation of a no idling zone. However, this feasible mitigation measure may eliminate idling emissions and may avoid potentially significant health risk impacts.

**Table 3  
Mitigation Measures**

<b>Source Category</b>	<b>Mitigation Measure (listed in order of effectiveness by category)</b>
Stationary Sources Type A (Sources Impacting receptors) (e.g., Auto body shops, Gas Stations, Manufacturers, Metal Platers, Chemical Producers, Rock Quarries, Incinerators, Power Plants, Diesel Engines)	<ol style="list-style-type: none"> <li>1. Move source location to provide effective buffer zone.</li> <li>2. Reduce throughput.</li> <li>3. Install Toxic Best Available Control Technology (TBACT) to reduce the risks to below significance.</li> <li>4. Install other than TBACT air pollution control devices or process operation modifications.</li> <li>5. Address Diesel vehicle engines as listed below.</li> </ol>

<b>Source Category</b>	<b>Mitigation Measure (listed in order of effectiveness by category)</b>
Onsite Diesel Truck Activities (including transport refrigeration units)	<p><u>Idling Mitigation Measures:</u></p> <ol style="list-style-type: none"> <li>1. Move source location to provide effective buffer zone.</li> <li>2. Establish truck parking restrictions.</li> <li>3. Provide utility hook-ups for trucks that need to cool their load.</li> <li>4. Limit truck idling to &lt;5 minutes (State law limits to 5 minutes of idling, and includes various exemptions).</li> <li>5. Require Trucks to operate an Auxiliary Power Unit.</li> <li>6. Require the installation of electrical hookups at loading docks and the connection of trucks equipped with electrical hookups to eliminate the need to operate diesel-powered TRUs at the loading docks.</li> </ol> <p><u>Onsite Truck Traveling Emissions:</u></p> <ol style="list-style-type: none"> <li>1. Move source location to provide effective buffer zone.</li> <li>2. Restrict operation to 2007 model year or newer trucks.</li> <li>3. Require or provide incentives to use Diesel Particulate Filters for truck engines.</li> <li>4. Re-route truck traffic by adding alternate access for truck traffic or by restricting truck traffic on certain sensitive routes.</li> <li>5. Improve traffic flow by signal synchronization.</li> <li>6. Implement incentive for improved communications of fluctuating demand forecasts for labor and equipment among carriers and operators.</li> </ol>
High-traffic road vehicle emissions impacting adjacent receptors	<ol style="list-style-type: none"> <li>1. Move receptors or source to provide effective buffer zone between the source and the receptor.</li> <li>2. Improve traffic flow by signal synchronization.</li> <li>3. Plant vegetation between receptor and roadway.</li> <li>4. Construct wall barriers between receptor and roadway.</li> <li>5. Install newer electrostatic filters in adjacent receptor buildings.</li> <li>6. Fund “clean” street sweepers.</li> <li>7. Improve road infrastructure to facilitate improved traffic flow without inducing capacity.</li> <li>8. Improve alternative transportation options</li> </ol>
Freeway vehicle emissions impacting adjacent receptors	<ol style="list-style-type: none"> <li>1. Move receptors or source to provide effective buffer zone between the source and the receptor.</li> <li>2. Plant vegetation between receptor and roadway.</li> <li>3. Construct wall barriers between receptor and roadway.</li> <li>4. Install newer electrostatic filters in adjacent receptor buildings.</li> <li>5. Improve road infrastructure to facilitate improved traffic flow.</li> </ol>
Marine Vehicles (e.g., recreational boating, commercial marine operations, hoteling operations, loading and unloading services)	<ol style="list-style-type: none"> <li>1. Move receptors or source to provide effective buffer zone between the source and the receptor.</li> <li>2. Require or provide incentives to install add-on Diesel Particulate Matter control devices or cleaner engines or boilers.</li> <li>3. Require use of electric power when berthed.</li> <li>4. Require cleaner fuels.</li> <li>5. Limit vessel speed.</li> </ol>

Source Category	Mitigation Measure (listed in order of effectiveness by category)
Railroad (i.e., switch yards, maintenance yards, intermodal centers)	<ol style="list-style-type: none"> <li>1. Move receptors or source to provide effective buffer zone between the source and the receptor.</li> <li>2. When ambient temperatures are above 50 deg F, minimize locomotive engine idling by shutting down and re-starting engines.</li> <li>3. Require Idle Reduction Technologies - The rail industry has developed and designed a new Auxiliary Power Unit (APU) system that provides power during idling conditions and shuts down the main locomotive engine. Installing APU system reduces locomotive PM emissions by 84 percent-</li> <li>4. Require new engine technologies be applied to the engines - Modifying fuel injectors, which includes fuel injection pressure, fuel spray pattern, injection rate and timing, has been found to reduce emissions from locomotive diesel engines.</li> <li>5. Require hybrid switcher locomotives.</li> <li>6. Require use of locomotive technology that meets or exceeds the latest EPA emission regulations for locomotives.</li> <li>7. Apply the 1998 Railroad MOU for South Coast Air Basin.</li> <li>8. Apply the 2005 Statewide MOU for Rail Yard Risk Reduction.</li> </ol>

## 8.4 Mitigation Monitoring and Reporting

### 8.4.1 Primary Mitigation Measures

As part of CEQA environmental review procedures, Public Resources Code Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring efficacy of mitigation measures applied to the proposed project. Specifically, the lead or responsible agency must adopt a reporting or monitoring program for mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during project implementation. As stated in Public Resources Code, Section 21081.6 (a) (1):

*“The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.”*

This requirement is intended to assure that mitigation measures included as conditions of project approval are indeed implemented. A mitigation monitoring and reporting program should include the following components:

- A description of each mitigation measure adopted by the Lead Agency.
- The party responsible for implementing each mitigation measure.
- A schedule for the implementation of each mitigation measure.
- The agency or entity responsible for monitoring mitigation measure implementation.
- Criteria for assessing whether each measure has been implemented.
- Enforcement mechanism(s).

The mitigation monitoring and reporting program is not required to be included in the environmental document, but its inclusion will encourage the Lead Agency and other entities to specifically consider the feasibility and effectiveness of each mitigation measure while the environmental analysis is still underway. If a responsible agency or any agency having jurisdiction over natural resources affected by the project proposes mitigation measures, the Lead Agency may require that agency to prepare a monitoring and reporting program for those mitigation measures.

#### **8.4.2 Contingency Mitigation Measure**

A mitigation implemented to reduce health risk for a particular project may degrade or fail over time. Continuous monitoring and enforcement programs are recommended to ensure the ongoing effectiveness of all mitigation measures over the project life. In the instance that one or more mitigation measures fail or become ineffective, they should be replaced with mitigation measures of equal or greater effectiveness.

Examples of health risk mitigation measures subject to degradation and/or failure include:

- Vegetation barriers, which may die due to natural causes or lack of upkeep;
- Particulate filters, which may become clogged, mechanically damaged or simply reach the end of their design life; and,
- Indoor air filtration systems, which may become clogged or fail completely due to lack of regular maintenance.

## 9.0 Public Participation

As emphasized in the ARB Handbook, community involvement is an important part of the overall land use approval process. Public participation is critical when proposed projects could create increased health risk to the individuals or the community. To that extent, engaging community members during the initial phase of the project evaluation process provides a communication conduit between impacted individuals, project proponents and the decision makers. This dialog aims to expand the community's overall understanding of the risk assessment process and the resulting health impact values. While the air district is not typically the lead agency for a project undergoing health risk evaluation, it plays a critical role in working with the impacted community to explain the technical modeling tools and assumptions used to calculate the overall risk values that are ultimately provided to local decision makers for approval action.

Active public participation requires engaging individuals in ways that do not require prior knowledge of air pollution issues impacting their communities. Information should be provided to illustrate how a land use decision can affect the health of the community due to emission impacts from Type A or to Type B projects. Due to the overly technical nature of health risk assessments, air districts need to take specific efforts to develop messages and outreach tools that will assist to convey complex issues to a non-technical community. The outreach process needed to build effective community participation requires data, methodologies and formats customized to the needs of the specific community. Depending on the community characteristics cultural barriers, such as translation to another language, need to be assessed prior to conducting community outreach. More importantly, it requires the strong collaboration of community members and agencies that review and approve projects and land uses of the local community.

The ARB Handbook's Table 7-1, Public Participation Approaches includes some general outreach strategies that air districts might consider in designing an outreach program to increase understanding of the air pollution impacts to specific land use projects. Such a program could consider the preparation and presentation of information in a way that supports sensible decision-making and public involvement. In order to build community trust in the health risk assessments being conducted for proposed development, public participation should occur at the initial phases of project evaluation and continue throughout the approval process.

## 10.0 HRA Issues in the CEQA Process

There are number of issues that have been encountered at the local decision making level that present challenges during the evaluation of health risk impacts from proposed land use projects. To provide more assistance to air districts, lead agencies and community members on how to overcome these challenges, this chapter outlines a few issues that have been encountered during the project evaluation phase, as well as potential solutions to reduce health risk, minimize errors and assist decision makers in their final action.

### 10.1 *Smart Growth*

Land use planners, developers, public health agencies and environmentalists alike all struggle with the apparent dichotomy between the public health benefits of limiting development adjacent to freeways and major roadways, and the public health benefits of smart growth strategies which call for development closer in to the urban core, often adjacent to major travel corridors, as a way to reduce overall emissions. Guidance that helps local planners disclose potential risk, and/or seeks to limit development adjacent to freeways and major roadways appears to conflict with smart growth policies, especially when the guidance affects small projects.

A potential solution to this dilemma is the identification and implementation of effective mitigation measures that will help reduce impacts to sensitive receptors, thereby supporting smart growth policies. Table 3 contains program-level TAC mitigation measures. Such measures are applicable to long-range community planning programs such as General Plans and address land use incompatibility at an early stage. These measures are particularly effective in that they can prevent many high-risk projects from being considered or proposed in the first place, thereby eliminating the necessity for project-level mitigation which may not always be feasible or sufficiently effective. Examples of program-level mitigation measures include rezoning vacant land adjacent to freeways, high-volume roadways, ports, railroads or heavy industry to avoid future proposed siting of residential and/or sensitive receptors.

### 10.2 *Less than Lifetime Cancer Risk Exposures*

The standard OEHHA 70 year exposure timeframe for HRAs is often vigorously challenged as to whether it is reasonable to base residential cancer risk on a 70 year, 24 hour per day, seven day per week exposure. A 70-year lifetime exposure is a worst-case assumption. Shorter exposure periods can be appropriate depending on the situation. The cancer risks caused by projects impacting offsite workers can be factored in accordance with guidance provide in the State Office of Environmental Health Hazard Assessment provided a document called the *Air Toxic Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments*, August 2003. This guidance document also describes how the exposure period can be reduced from 70 year to shorter periods for Type A projects that will operate for periods less than 70 years. This information is also included in the ***Technical Modeling and Risk Assessment Guidance*** component of this document in Attachment 1.

### ***10.3 Mitigating Roadway Toxics***

As discussed above, lead agencies often struggle with requiring mitigation when, due to a lack of a threshold, the roadway toxics impacts are not considered “significant.” At other times, lead agencies are eager to require mitigation, but feel most comfortable being able to point to studies that quantify the actual mitigation levels before asking project proponents to bear the additional costs of the mitigation. In addition, lead agencies often do not feel comfortable asking a project to make changes via implementing mitigation when the project complies with existing zoning requirements and does not request exemptions. While this is a contentious issue, districts may choose to suggest mitigation measures regardless of whether a health risk determination was made by the lead agency.

### ***10.4 Existing Background Risk***

Often, environmental documents with site specific HRAs contain lengthy discussions comparing a project’s health risk to the existing background health risk levels, and often, potential project-specific cancer risk levels are expressed as a percentage of the existing background risk without disclosure of the actual additional risk due to the project. It is the actual additional risk due to the project (Type A), or the risk to the project (Type B) that must be disclosed and compared to CEQA significance thresholds.

### ***10.5 Inappropriate Discounting of Risks***

Standardized health risk assessment methodologies have been developed to reduce inconsistencies between HRAs and aid in comparing impacts on receptors. However, in practice inappropriate HRA calculations are still carried out and presented as the basis for public disclosure and notification. Such inappropriate HRA calculations are most often made in an attempt to present reduced risk values compared to the higher results produced by standard methodologies. This is a significant concern, especially with respect to health risks associated with locating sensitive land uses in proximity to freeways and other high traffic roadways, where even the standardized HRA modeling methods may not thoroughly characterize all the health risk associated with nearby exposure to traffic generated pollutants.

Inappropriate HRA methodologies often result in protracted controversy, which is sometimes played out in the public arena - for example, at project approval hearings. To minimize these situations, the HRA preparer should adhere to the standard risk calculation methodologies set forth by OEHHA, the Air Resources Board, and the local air district, and as described in this document.

Examples of some mistakes to avoid are described in the following paragraphs.

- One inappropriate calculation is to calculate the cancer risk using the 70-year exposure timeframe, but then reduce the risk values by dividing the risk values by the number of receptors in the subdivision. Doing so is misleading and not scientifically supported. Potential cancer risk should be expressed as probability per million, based upon OEHHA recommendations.

- For Type A projects, it is also inappropriate to present risk values as a percentage of some existing risk value, such as the existing background risk. Often this is done in an attempt to persuade readers that the project specific risk is of little consequence because the increased risk is small compared to the background risk. In cases where project specific risk is compared to other risks or expressed as a percentage of the existing background, it should be made clear that the project specific risk is in addition to the existing background risk.
- Another inappropriate calculation sometimes included in risk assessments is to base emissions on emission factors that may result from future actions, such as emission reduction rules that have not yet gone into effect, or expected emission reductions due to expected market forces.

### ***10.6 Misleading Comparison of Cancer Risks***

Comparing cancer risks can be misleading in a CEQA document. Some CEQA documents discuss a variety of cancers and the prevalence of it in our population. It's sometimes stated, for example, that currently throughout the United States, one in three or four persons will experience cancer sometime during their lifetime. This can be a misleading statistic if it is used to imply that the incremental probability of increased cancer cases due to toxic airborne emissions are very small compared to the overall probability of cancer. For example, a Health Risk Assessment may find that the increased probability of cancer cases is 200 in one million for certain sensitive receptors located near a busy freeway. To compare that HRA result with the overall population's cancer incidence would discount the risk unfairly. The CEQA document should disclose the risk without any such comparisons.

### ***10.7 "Experts Disagree"***

When project proponents submit HRAs and related materials that are developed via methodologies not supported by the air district or OEHHA, protracted controversy can result. One air district noted that, despite comment from OEHHA and ongoing district comments on the inappropriate discounting of a project's HRA results, those results remained unchanged in the Final EIR. The Final EIR discussed the nature of the disagreement, citing Section 15151 of the CEQA Guidelines which states that disagreement among experts "does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts." Ultimately, the lead agency will make a land use decision based on their understanding. But for sources that need an air district permit, the applicable air district's risk assessment procedures will apply.

## 11.0 Conclusion

The study of the impact of toxic air emissions on sensitive receptors is an evolving one. Air districts in the state of California generally have had a consistent way of performing health risk assessments of stationary sources on nearby sensitive receptors (Type A projects). However, with the publication in 2005 of ARB's Handbook, the issue of the effect of mobile sources on sensitive receptors (Type B projects) required air districts to augment their guidance. This CAPCOA guidance reflects the fact that currently, the various air districts in the state have different approaches to the topic. For example, some districts have developed a threshold of significance for these projects and some have not. Despite these differences, this document offers some common guidance about the need to analyze the impacts, to disclose the risk to decision makers and to mitigate it. As health risk analysis tools, methodology, and protocol as developed, the document will be revised.

## **Attachment 1**

# **Technical Modeling and Risk Assessment Guidance**

Prepared by  
CAPCOA Planning Managers  
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## Preface

The document shows how to model emissions of toxic substances from various source types to determine the cancer risk, acute risk, and noncancer chronic risk impacting nearby receptors. It can also be used to determine the impacts to new receptors (such as housing projects) proposed to be built next to existing sources that emit toxic substances. These guidelines were prepared to assist in complying with the requirements of the California Environmental Quality Act (CEQA). CEQA requires that environmental impacts of a proposed project be identified, assessed, and mitigated (as possible) if the environmental impacts are significant.

This document consists of three components:

- Modeling Guidelines,
- Exposure Assessment Guidelines, and
- Appendices describing how to determine the emissions and risks from common source categories. Examples of these sources categories include:
  - Roadways,
  - Facilities with onsite truck travel and idling,
  - Stationary diesel engines, and
  - Fast food and other restaurants.

The modeling guidelines are based on a document entitled “Provision of Services to Develop Guidance for Air Dispersion Modeling,” developed by Dr. Jesse Thé of Lakes Environmental Software. They have been modified to include various air quality dispersion modeling issues pertinent to California, and are based primarily on information found in EPA’s Guideline on Air Quality Models (Appendix W of Part 51 of Title 40 of the Code of Federal Regulations). The modeling components are intended to provide insight into recommended modeling approaches and provide consistency in the modeling methods used.

The Exposure Assessment components are based on the procedures developed by the California Office of Environmental Health Hazard Assessment (OEHHA). These calculation methodologies may change over time as the OEHHA refines the methodologies. **It is important that the air district be contacted before any risk assessment calculations are prepared, so that the most current methodologies are applied.**

This document is not designed to provide theoretical background on the models it discusses. Technical documents covering these topics can be easily obtained from several U.S. EPA sources and are listed as references in this document. This document does provide details on performing a successful modeling study including:

- Model Backgrounds and Applicability,
- Model Selection and Study Approach,
- Tiered Approach to Assessing Compliance,
- Model Input Data Requirements,
- Geographical Information,
- Meteorological Data Requirements and Acquisition, and
- Information/Parameters for Inclusion in an Assessment.

## Glossary of Terms

<b>AERMAP:</b>	The terrain preprocessor for AERMOD, AERMAP allows the use of digital terrain data in AERMOD.
<b>AERMET:</b>	The meteorological preprocessor for AERMOD.
<b>AERMIC:</b>	American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee.
<b>AERMOD:</b>	A new air dispersion model developed by AERMIC. It is intended to replace the ISCST model.
<b>Air Emissions:</b>	Release of pollutants into the air from a source.
<b>Albedo:</b>	Portion of the incoming solar radiation reflected and scattered back to space.
<b>Ambient Air:</b>	Air that is accessible to the public.
<b>AMS:</b>	American Meteorological Society.
<b>CAL3QHCR:</b>	CAL3QHCR is derived from CAL3QHC which is also derived from CALINE3. CALINE3 is a Carbon Monoxide (CO) model with queuing, hot spot calculations, and a traffic model to calculate delays and queues that occur at signalized intersections. CAL3QHCR is a more refined version requiring local meteorological data.
<b>Calm:</b>	Cessation of horizontal wind.
<b>Complex Terrain:</b>	Terrain exceeding the height of the stack being modeled.
<b>DEM:</b>	Digital Elevation Model. Digital files that contain terrain elevations typically at a consistent interval across a standard region of the Earth's surface.
<b>Dispersion Model:</b>	A group of related mathematical algorithms used to estimate (model) the dispersion of pollutants in the atmosphere due to transport by the mean (average) wind and small scale turbulence.
<b>Emission Factor:</b>	An estimate of the rate at which a pollutant is released to the atmosphere
<b>Flagpole Receptor:</b>	Any receptor located above ground level.

<b>Inversion:</b>	An increase in ambient air temperature with height. This is the opposite of the usual case.
<b>ISCST:</b>	Industrial Source Complex – Short Term Dispersion Model.
<b>Lee side:</b>	The lee side of a building is the side that is sheltered from the wind.
<b>Mixing Height:</b>	Top of the neutral or unstable layer and also the depth through which atmospheric pollutants are typically mixed by dispersive processes.
<b>Monin-Obukhov Length:</b>	A constant, characteristic length scale for any particular example of flow. It is negative in unstable conditions (upward heat flux), positive for stable conditions, and approach infinity as the actual lapse rate for ambient air reaches the dry adiabatic lapse rate.
<b>NWS:</b>	National Weather Service. A U.S. government organization associated with the National Oceanic and Atmosphere Administration.
<b>PCRAMMET:</b>	Meteorological program used for regulatory applications capable of processing twice-daily mixing heights (TD-9689 FORMAT) and hourly surface weather observations (CD-144 format) for use in dispersion models such as ISCST, CRSTER, MPTER and RAM.
<b>Preferred Model:</b>	A refined model that is recommended for a specific type of regulatory application.
<b>Primary Pollutant:</b>	Substance emitted from the source.
<b>Regulatory Model:</b>	A dispersion model that has been approved for use by the regulatory offices of the U.S. EPA, specifically one that is included in Appendix A of the Guideline on Air Quality Models (Revised), such as the ISC model.
<b>Screening Technique:</b>	A relatively simple analysis technique to determine if a given source is likely to pose a threat to air quality. Concentration estimates from screening techniques are conservative.
<b>Simple Terrain:</b>	An area where terrain features are all lower in elevation than the top of the stack of the source.
<b>Upper Air Data (soundings):</b>	Meteorological data obtained from balloon-borne instrumentation that provides information on pressure, temperature, humidity and wind away from the surface of the earth.

**U.S. EPA:**

United States Environmental Protection Agency.

**Worst Case:**

The maximum exposure, dose, or risk that can conceivably happen to specific receptors.

# Chapter 1. A Tiered Approach to Risk

## 1.0 Modeling and Exposure Assessment Tiers Overview

Risk assessments are normally prepared in a tiered manner, where progressively more input data is collected to refine the results. Both the modeling component and the exposure assessment component are based on a tiered method. This document shows how to:

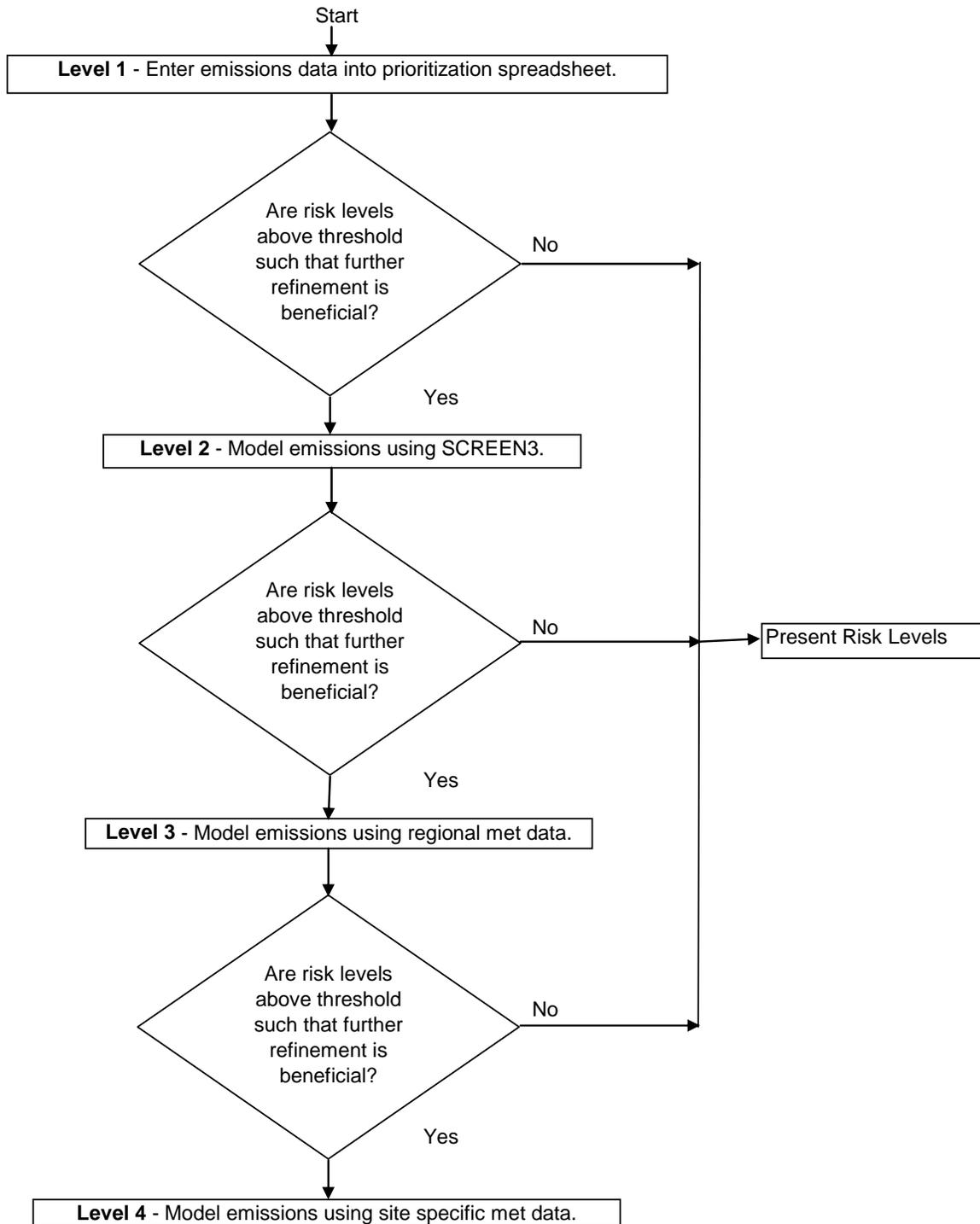
- Model the downwind concentrations of pollutants using each of the four modeling tiers (levels), then
- Use tiers to prepare the exposure assessment part of the risk assessment.

The models described in the document include:

- Screening models:
  - SCREEN3, and
  - AERSCREEN
- Refined models:
  - ISCST3,
  - ISC-PRIME, and
  - AERMOD
  - CAL3QHCR

A tiered approach to air dispersion modeling is presented in Figure 1. The level of effort generally increases with level number. It should be noted that any of the tiers or levels can provide risk assessment results, although the higher the tier or level the more accurate the results. Linear progression through each tier or level is not necessary. For example, a refined modeling analysis can be prepared without first preparing a screening analysis.

**Figure 1 - Tiered approach to modeling for risk assessments:**



## **1.1 Dispersion Models used for each TIER:**

### **1.1.1 Level 1 – Prioritization Screening**

A Level 1 analysis utilizes the CAPCOA prioritization methodology (<http://www.arb.ca.gov/ab2588/RRAP-IWRA/priguide.pdf>), or an air district's prioritization procedure to determine the potential impact from a facility's operation based on the quantity of emissions emitted and proximity to a receptor(s) and release height. But before preparing a Level 1 analysis, the air district should be consulted. A prioritization calculation is a screening tool that identifies whether a source has the possibility to exceed a prioritization score that represents the need for further analysis, usually this level is a score of ten

The following input data must be included in a prioritization calculation:

- The nearest receptor (residential or offsite worksite) must be used to represent all other receptors; regardless of the location of the receptor to the proposed project.
- Emissions should represent the "worst case" emissions estimate. Worst case for cancer risk is based on 70 years of exposure. Worst case for acute adverse health effects is based on the hour with the highest emissions. Worst case for chronic adverse health effects is based on the annual average emissions. These emissions should be based on actual expected worst case emissions, rather than a theoretical potential to emit estimate. The emissions should be routine and predictable.
- The prioritization calculations must follow those in the CAPCOA Prioritization Guidelines or the district's prioritization guidelines.

### **1.1.2 Level 2 - SCREEN3 Modeling**

A Level 2 analysis is a screening level analysis using the U.S. EPA's SCREEN3 model, which includes all potential worst-case meteorological conditions. If a risk assessment based on SCREEN3 modeling shows risks below significance thresholds, then there is no need for additional modeling.

**Note:** At the time of writing this document, AERSCREEN remains unavailable and is currently in development. When AERSCREEN becomes available, it may be substituted for SCREEN3 in the multi-tier approach.

### **1.1.3 Level 3 – CAL3QHCR, ISCST3, or AERMOD modeling using Regional Met Data**

A Level 3 analysis is a more refined analysis using CAL3QHCR, ISCST3, or AERMOD and regional hourly meteorological data. Contact the District regarding the availability of preprocessed meteorological data sets.

### **1.1.4 Level 4 - CAL3QHCR, ISCST3 or AERMOD Modeling using Site Specific Met Data**

A Level 4 analysis is a more refined analysis using CAL3QHCR, ISCST3, or AERMOD and site specific hourly meteorological data. Contact the District regarding the availability of preprocessed meteorological data sets. This data typically must be pre-processed by the modeler or a meteorological data provider such as the National Weather Service (NWS). Local meteorological data sets include site-specific parameters and meteorological characteristics that directly represent the site of consideration with a greater level of detail than most regional data sets. A Level 4 analysis also encompasses modeling analyses that make use of any alternative models.

## 1.2 Exposure Assessment Tiers

When substances are emitted that can affect intake pathways other than inhalation, the use of the latest version of the Hot Spots Analysis and Reporting Program (HARP) modeling and risk assessment software is recommended. The latest version of HARP can be downloaded at <http://www.arb.ca.gov/toxics/harp/harp.htm>. If the emissions consist of only substances that enter the body through the inhalation pathway, other risk assessment methodologies consistent with the methodologies approved for the Air Toxics “Hot Spots” Emissions Inventory and Risk Assessment Program can be used. Most substances enter the body only through the inhalation pathway. Ingestion, dermal absorption, and other pathways are not usually significant pathways for emitted gases. Therefore, if all the substances impacting receptors only enter the body through inhalation, then the risk assessment preparation effort can be minimized. If just one substance can enter the body through another pathway, then a multipathway analysis must be prepared. An exception to this is diesel particulate, which is modeled only through the inhalation pathway.

The toxicity values that are used must be those that the California Office of Environmental Health Hazard Assessment (OEHHA) has identified. These toxicity values can be found at (<http://www.arb.ca.gov/toxics/healthval/healthval.htm>). If a substance is emitted and toxicity values have not been identified by OEHHA, other sources of data can be applied.

Although more detailed information can be found by directly reviewing the latest OEHHA risk assessment procedures, what follows is a description of the tiers associated with a multipathway exposure assessment. Additional information can be found at ARB’s HARP websites and OEHHA’s websites.

There are four basic tiers or levels that can be applied in the exposure assessment portion of the risk assessment:

### **Tier 1 -Point Estimate, Default Intake Values**

The easiest tier to complete assumes various intake default values, and calculates the risk as a single value rather than a distribution curve.

### **Tier 2 -Point Estimate, Site Specific Intake Values**

The next tier requires site specific information to determine intake values, but continues to apply single intake values to the risk values.

### **Tier 3 -Distribution Curve Risk Estimate, Default Distribution Curve Intake Values**

The third tier applies default distribution curve values to determine a distribution curve risk result.

### **Tier 4 -Distribution Curve Risk Estimate, Site Specific Distribution Curve Intake Values**

The fourth tier applies site specific distribution curve values to determine a distribution curve risk result.

## **1.3 Exposure Duration Adjustment (Cancer Only)**

Cancer risk calculations are based on a 70 year lifetime exposure. In some limited cases, it may be appropriate to also use either 9 or 40 years exposure in the calculation. The 9 year exposure scenario is based on exposure to children during the first 9 years of life. Some districts use the 9 year exposure scenario to model short term projects. The 40 year exposure scenario can be used to represent the risk to nearby workers. The local district should be contacted before using any exposure duration less than 70 years. In no case should an exposure period of less than 9 years be used.

## **Chapter 2. Application of Models**

### **2.0 Modeling Overview**

Air dispersion modeling is the mathematical estimation of pollutant impacts from emissions sources within a study area. Several factors impact the fate and transport of pollutants in the atmosphere including, but not limited to meteorological conditions, site configuration, emission release characteristics, and surrounding terrain.

### **2.1 Preferred Models**

Preferred Models are defined as standard models that are expected to be used for air quality studies. Alternative models may be used if conditions warrant their use. These are outlined in Section 2.3. The U.S. EPA's preferred models include SCREEN3 for screening analyses and AERMOD for refined modeling analyses. For CEQA, CAL3QHCR, ISCST, and ISC-PRIME may also be used.

For efficient risk assessment processing, the district should be consulted to determine the appropriateness of the model proposed for use. A brief overview of each of these models can be found below. For appropriate model selection, please review the section that outlines:

#### **2.1.1 AERMOD**

The American Meteorological Society/EPA Regulatory Model Improvement Committee (AERMIC) Regulatory Model, AERMOD<sup>1,2,3</sup> was specially designed to support the U.S. EPA's

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<sup>1</sup> U.S. Environmental Protection Agency, 1998. Revised Draft - User's Guide for the AMS/EPA Regulatory Model – AERMOD. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>2</sup> Paine, R.J., R.W. Brode, R.B. Wilson, A.J. Cimorelli, S.G. Perry, J.C. Weil, A. Venkatram, W.D. Peters and R.F. Lee, 2003. AERMOD: The Latest Features and Evaluation Results. Paper # 69878 presented at the Air and Waste Management Association 96th Annual Conference and Exhibition, June 22-26, 2003. Air and Waste Management Association, Pittsburgh, PA 15222.

<sup>3</sup> Cimorelli, A.J., S.G. Perry, A. Venkatram, J.C. Weil, R.J. Paine, R.B. Wilson, R.F. Lee, W.D. Peters, R.W. Brode, J.O. Paumier, 2002: AERMOD: Description of Model Formulation. U.S. Environmental Protection Agency, EPA-454/R-02-002d (draft dated October 31, 2002). Available from <http://www.epa.gov/scram001>.

regulatory modeling programs. AERMOD is the next-generation air dispersion model that incorporates concepts such as planetary boundary layer theory and advanced methods for handling complex terrain. AERMOD was developed to replace the Industrial Source Complex Model-Short Term (ISCST3) as U.S. EPA's preferred model for most small-scale regulatory applications.<sup>4,5</sup> The latest versions of AERMOD also incorporate the Plume Rise Model Enhancements (PRIME) building downwash algorithms, which provide a more realistic handling of downwash effects than previous approaches.

The PRIME model was designed to incorporate two fundamental features associated with building downwash:

- Enhanced plume dispersion coefficients due to the turbulent wake.
- Reduced plume rise caused by a combination of the descending streamlines in the lee of the building and the increased entrainment in the wake.

AERMOD contains basically the same options as the ISCST3 model with a few exceptions, which are described below:

- Currently, the model only calculates concentration values. Dry and wet deposition algorithms were not implemented at the time this document was written.
- AERMOD requires two types of meteorological data files, a file containing surface scalar parameters and a file containing vertical profiles. These two files are produced by the U.S. EPA AERMET meteorological preprocessor program<sup>4</sup>.
- For applications involving elevated terrain, the user must also input a hill height scale along with the receptor elevation. The U.S. EPA AERMAP terrain-preprocessing program<sup>6</sup> can be used to generate hill height scales as well as terrain elevations for all receptor locations.

The options AERMOD has in common with ISCST3 and ISC-PRIME are described in the next section.

## 2.1.2 ISCST3 & ISC-PRIME Overview

The ISCST3 dispersion model is a steady-state Gaussian plume model, which can be used to assess pollutant concentrations and/or deposition fluxes from a wide variety of sources associated with an industrial source complex. The ISCST3 dispersion model from the U.S. EPA was designed to support the EPA's regulatory modeling options, as specified in the Guidelines on Air Quality Models (Revised)<sup>7</sup>.

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<sup>4</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models (Revised), Volume 1. EPA-454/B-95-003a. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>5</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, Volume II – Description of Algorithms. U.S. Environmental Protection Agency, Research Triangle Park, NC 27711. Available from website <http://www.epa.gov/scram001> as of January 2003.

<sup>6</sup> U.S. Environmental Protection Agency, 1998. Revised Draft - User's Guide for the AERMOD Terrain Preprocessor (AERMAP). Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>7</sup> U.S. Environmental Protection Agency, 1986. Guidelines on Air Quality Models (Revised) and Supplement A. EPA-450/2-78-027R. U.S. Environmental Protection Agency, Research Triangle Park, NC.

The PRIME algorithms have been integrated into the ISCST3 (Version 96113) model. This integrated model is called ISC-PRIME<sup>8</sup>. The ISC-PRIME model uses the standard ISCST3 input file with a few modifications in the Source Pathway section. These modifications include three new inputs that which are used to describe the building/stack configuration.

To be able to run the ISC-PRIME model, you must first perform building downwash analysis using the Building Profile Input Program (BPIP). For more information on building downwash please refer to Section 3.8 - Building Impacts.

Some of the ISCST3/ISC-PRIME modeling capabilities are:

- ISC-PRIME model may be used to model primary pollutants and continuous releases of toxic and hazardous pollutants.
- ISC-PRIME model can handle multiple sources, including point, volume, area, and open pit source types. Line sources may also be modeled as a string of volume sources or as elongated area sources.
- Source emission rates can be treated as constant or may be varied by month, season, hour-of-day, or other periods of variation. These variable emission rate factors may be specified for a single source or for a group of sources.
- The model can account for the effects of aerodynamic downwash due to nearby buildings on point source emissions.
- The model contains algorithms for modeling the effects of settling and removal (through dry deposition) of large particulates and for modeling the effects of precipitation scavenging for gases or particulates.
- Receptor locations can be specified as gridded and/or discrete receptors in a Cartesian or polar coordinate system.
- ISC-PRIME incorporates the COMPLEX1 screening model dispersion algorithms for receptors in complex terrain.
- ISC-PRIME model uses real hourly meteorological data to account for the atmospheric conditions that affect the distribution of air pollution impacts on the modeling area.
- Results can be output for concentration, total deposition flux, dry deposition flux, and/or wet deposition flux. Until AERMOD has incorporated deposition, ISC-PRIME would be the preferred model for applications such as risk assessment where deposition estimates are required.

Unlike AERMOD, the ISC models do not contain a terrain pre-processor. As a result, receptor elevation data must be obtained through alternative means. The use of an inverse distance algorithm for interpolating representative receptor elevations is an effective method.

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<sup>8</sup> U.S. Environmental Protection Agency, 1997. Addendum to ISC3 User's Guide – The Prime Plume Rise and Building Downwash Model. Submitted by Electric Power Research Institute. Prepared by Earth Tech, Inc., Concord, MA.

### 2.1.3 SCREEN3 Overview

The SCREEN3 model was developed to provide an easy-to-use method of obtaining pollutant concentration estimates. These estimates are based on the document "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources"<sup>9</sup>.

SCREEN3, version 3.0 of the SCREEN3 model, can perform all the single source short-term calculations in the EPA screening procedures document, including:

- Estimating maximum ground-level concentrations and the distance to the maximum.
- Incorporating the effects of building downwash on the maximum concentrations for both the near wake and far wake regions.
- Estimating concentrations in the cavity recirculation zone.
- Estimating concentrations due to inversion break-up and shoreline fumigation.
- Determining plume rise for flare releases.

EPA's SCREEN3<sup>10</sup> model can also:

- Incorporate the effects of simple elevated terrain (i.e., terrain not above stack top) on maximum concentrations.
- Estimate 24-hour average concentrations due to plume impaction in complex terrain (i.e., terrain above stack top) using the VALLEY model 24-hour screening procedure.
- Model simple area sources using a numerical integration approach.
- Calculate the maximum concentration at any number of user-specified distances in flat or elevated simple terrain, including distances out to 100 km for long-range transport.
- Examine a full range of meteorological conditions, including all stability classes and wind speeds to find maximum impacts.
- Include the effects of buoyancy-induced dispersion (BID).
- Explicitly calculate the effects of multiple reflections of the plume off the elevated inversion and off the ground when calculating concentrations under limited mixing conditions.

### 2.1.4 CAL3QHCR Overview

"CAL3QHCR is a refined version of the original CALINE (California Line Source Dispersion Model) that was developed as a modeling tool to predict roadside CO concentrations. CAL3QHCR can be used to estimate ambient PM concentrations and to process hourly meteorological data over a year, hourly emissions, traffic volume, and signal data. The model can be obtained from EPA at [http://www.epa.gov/scram001/dispersion\\_prefrec.htm](http://www.epa.gov/scram001/dispersion_prefrec.htm).

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<sup>9</sup> U.S. Environmental Protection Agency, 1992: Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised, October 1992 (EPA-450/R-92-019), User's Guide for the Industrial Source Complex (ISC2) Dispersion Models: Volume II—Description of Model Algorithms. U.S. Environmental Protection Agency, OAQPS, Research Triangle Park, NC 27711. Publication No. EPA-450/4-92-008b.

<sup>10</sup> U.S. Environmental Protection Agency, 1995. SCREEN3 Model User's Guide. EPA-454/B-95-004. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

## 2.2 ISC and AERMOD Model Comparison

The ISC and AERMOD models share several similarities:

- Both are steady state plume models
- AERMOD input and output are intentionally similar to ISC for ease of use

AERMOD is a next-generation model, and while input and output may share similarities in format, there are several differences as detailed in the table below.

**Table 2 – Differences between ISCST3 and AERMOD**

ISCST3	AERMOD
Plume is always Gaussian	Plume is non-Gaussian when appropriate
Dispersion is function of six stability classes only	Dispersion is function of continuous stability parameters and height
Measured turbulence cannot be used	Measured turbulence can be used
Wind speed is scaled to stack height	Calculates effective speed through the plume
Mixing height is interpolated	Mixing height is calculated from met data
Plume either totally penetrates the inversion, or not at all	Plume may partially penetrate the inversion at the mixing height
Terrain is treated very simplistically	More realistic terrain treatment, using dividing streamline concept
Uses single dispersion for all urban areas	Adjusts dispersion to size of urban area
Cannot mix urban and rural sources	Can mix urban and rural sources

## 2.3 Alternative Models

Alternative models may also be accepted to determine health risks for CEQA projects. Please see the Guideline on Air Quality Models (published as Appendix W of 40 CFR Part 51) for terms of appropriate use and required supporting explanations. **Please note**, pre-approval is normally sought from the district before using alternative models.

## 2.4 Model Validations

The U.S. EPA ISCST3 / ISC-PRIME and AERMOD models are some of the most studied and validated models in the world. Studies have typically demonstrated good correlation with real-world values. AERMOD particularly handles complex terrain very well, closely matching the trends of field observations from validation studies.

ISC-PRIME differs from ISCST3 primarily in its use of the PRIME downwash algorithm. A model evaluation study was carried out under the auspices of the Electric Power Research Institute

(EPRI). The report<sup>11</sup> is available from EPRI and from the U.S. EPA SCRAM website <http://www.epa.gov/scram001>. The report analyzed comparisons between model predictions and measured data from four databases involving significant building downwash. This is in addition to 10 additional databases that were used during the development of ISC-PRIME. The study found that ISC-PRIME performed much better than ISCST3 under stable conditions, where ISCST3 predictions were very conservative (high). In general, ISC-PRIME was unbiased or somewhat over predicting. Also, ISC-PRIME showed a statistically better performance result than ISCST3 for each database in the study.

The U.S. EPA performed the evaluation of AERMOD. A summary of the evaluation studies was prepared by Paine, et al<sup>12</sup>. This and more detailed reports can be found at the U.S. EPA SCRAM website. Five databases were used during the development of the model. Five additional non-downwash databases were used in the final evaluation. For cases involving building downwash, four developmental databases were used to check the implementation of PRIME into AERMOD as it was accomplished. Three additional databases were reserved for the final evaluation. AERMOD remained unbiased for complex terrain databases as well as flat terrain, while ISCST3 severely over-predicted for complex terrain databases.

## **Chapter 3. MODEL INPUT DATA**

### **3.0 Comparison of Screening and Refined Model Requirements**

The use of the screen model requires the least amount of effort to calculate risks but produces the most conservative results. The SCREEN3 model input requirements are described in the next section.

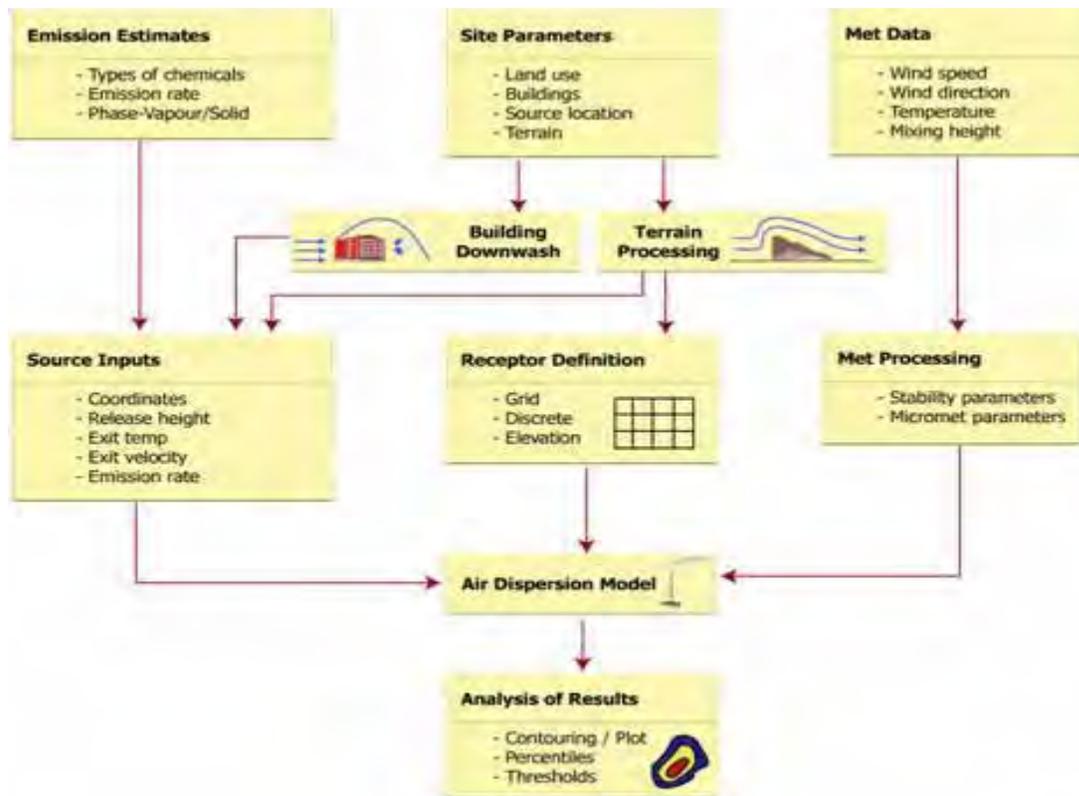
Refined air dispersion modeling using the U.S. EPA AERMOD or ISCST3 / ISC-PRIME models can be broken down into a series of steps. These are outlined in Sections 3.2 and 3.3.

A general overview of the process typically followed for performing an air dispersion modeling assessment is present in Figure 3.1 below. The figure is not meant to be exhaustive in all data elements, but rather provides a picture of the major steps involved in an assessment.

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<sup>11</sup> Paine, R.J. and F. Lew, 1997. Results of the Independent Evaluation of ISCST3 and ISC-PRIME. EPRI Paper No. TR2460026, WO3527-02, Final Report. Electric Power Research Institute, Palo Alto, CA 94304.

<sup>12</sup> Paine, R.J., R.W. Brode, R.B. Wilson, A.J. Cimorelli, S.G. Perry, J.C. Weil, A. Venkatram, W.D. Peters and R.F. Lee, 2003. AERMOD: The Latest Features and Evaluation Results. Paper # 69878 presented at the Air and Waste Management Association 96th Annual Conference and Exhibition, June 22-26, 2003. Air and Waste Management Association, Pittsburgh, PA 15222.



**Figure 3.1 - Generalized process for performing a refined air dispersion modeling assessment.**

### 3.1 SCREEN3

The SCREEN model<sup>13</sup> was developed to provide an easy-to-use method of obtaining pollutant concentration estimates. This model is normally used as an initial screening tool to assess **single sources** of emissions. SCREEN3 can be applied to multi-source facilities by conservatively summing the maximum concentrations for the individual emissions sources.

To perform a modeling study using SCREEN3, data for the following input requirements must be supplied:

- Source Type (Point, Flare, Area or Volume)
- Physical Source and Emissions Characteristics.  
(For example, a point source requires:
  - Emission Rate
  - Stack Height
  - Stack Inside Diameter
  - Stack Gas Exit Velocity
  - Stack Gas Exit Temperature
  - Ambient Air Temperature

<sup>13</sup> U.S. Environmental Protection Agency, 1995. SCREEN3 Model User's Guide. EPA-454/B-95-004. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

- Receptor Height Above Ground
- Meteorology: SCREEN3 can consider all conditions, or a specific stability class and wind speed can be provided.
  - If a single wind speed/stability combination is used, the predicted concentration should only be used to determine hourly concentration, as the factors used to convert hourly concentration to annual concentrations are only valid when SCREEN3 is ran with full meteorological data selected.
- Building Downwash: If this option is used then building dimensions (height, length and width) must be specified.
- Terrain: SCREEN3 supports flat, elevated and complex terrain. If elevated or complex terrain is used, distance and terrain heights must be provided.
- Fumigation: SCREEN3 supports shoreline fumigation. If used, distance to shoreline must be provided.

As can be seen above, the input requirements are minimal to perform a screening analysis using SCREEN3. The refined models discussed in the next sections, have much more detailed options allowing for greater characterization and more representative results.

## 3.2 AERMOD

The supported refined models have many input options, and are described further throughout this document as well as in their own respective technical documents<sup>14,15,16,17</sup>. An overview of the modeling approach and general steps for using each refined model are provided below. The general process for performing an air dispersion study using AERMOD includes:

- Meteorological Data Processing (AERMET is used for this)
- Obtain Digital Terrain Elevation Data (If terrain is being considered)
- Building Downwash Analysis (BPIP-PRIME is used for this) – Project requires source and building information
- Final site characterization – complete source and receptor information
- AERMAP – Perform terrain data pre-processing for AERMOD air dispersion model if required.
- AERMOD – Run the model.
- Visualize and analyze results.

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<sup>14</sup> Cimorelli, A.J., S.G. Perry, A. Venkatram, J.C. Weil, R.J. Paine, R.B. Wilson, R.F. Lee, W.D. Peters, R.W. Brode, J.O. Paumier, 2002: AERMOD: Description of Model Formulation. U.S. Environmental Protection Agency, EPA-454/R-02-002d (draft dated October 31, 2002). Available from <http://www.epa.gov/scram001>.

<sup>15</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models (Revised), Volume 1. EPA-454/B-95-003a. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

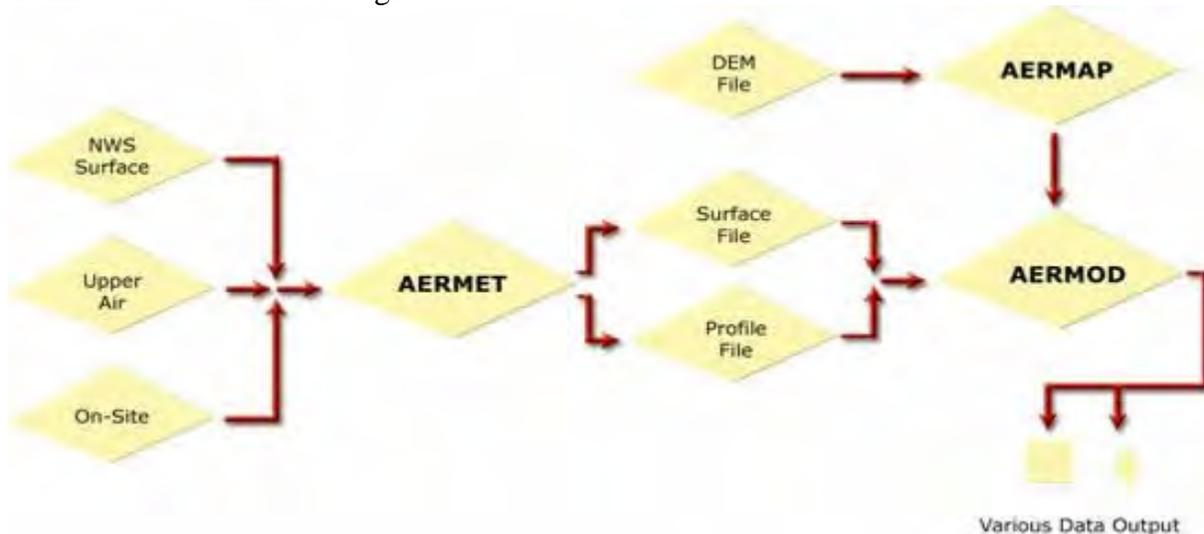
<sup>16</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, Volume II – Description of Algorithms. U.S. Environmental Protection Agency, Research Triangle Park, NC 27711. Available from website <http://www.epa.gov/scram001> as of January 2003.

<sup>17</sup> U.S. Environmental Protection Agency, 1997. Addendum to ISC3 User's Guide – The Prime Plume Rise and Building Downwash Model. Submitted by Electric Power Research Institute. Prepared by Earth Tech, Inc., Concord, MA.

As can be seen above, the AERMOD modeling system is comprised of 3 primary components as outlined below and illustrated in Figure 3.2:

- AERMET – Meteorological Data Preprocessor
- AERMAP – Digital Terrain Preprocessor
- AERMOD – Air dispersion model

To successfully perform a complex terrain air dispersion modeling analysis-using AERMOD, you must complete the processing steps required by AERMET and AERMAP. See Appendix A for more information on meteorological data.



**Figure 3.2 - The AERMOD air dispersion modeling system.**

### 3.3 ISC-PRIME

The ISC-PRIME model has very similar input requirements when compared with AERMOD. These include:

- Meteorological Data Processing - PCRAMMET
- Obtain Digital Terrain Elevation Data (If terrain is being considered)
- Building Downwash Analysis (BPIP-PRIME) – Project requires source and building information
- Final site characterization – complete source and receptor information
- ISC-PRIME – Run the ISC-PRIME model.
- Visualize and analyze results.

As can be seen above, the ISC and AERMOD models follow a very similar approach to perform an air dispersion modeling project. The primary difference between running the ISC and AERMOD models is that ISC does not require a terrain preprocessor, such as AERMAP. Furthermore, ISC relies on a different meteorological preprocessor known as PCRAMMET. The components of meteorological data pre-processing using PCRAMMET are illustrated in Figure 3.3 below. For a complete outline on how to obtain meteorological data, please see Appendix A.

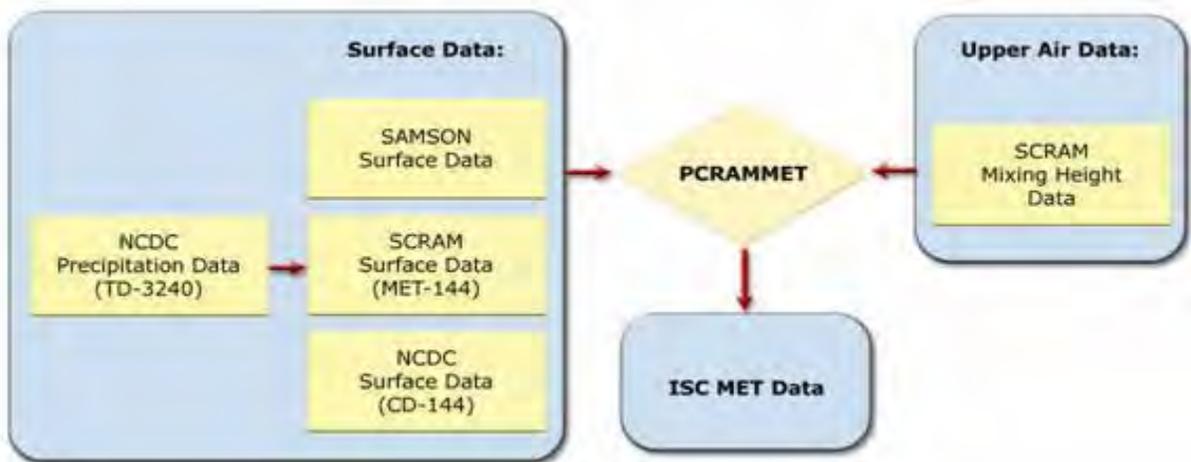


Figure 3.3 - Meteorological data pre-processing flow diagram for the U.S. EPA ISC models

### 3.4 Regulatory and Non-Regulatory Option Use

The ISC-PRIME and AERMOD models contain several regulatory options, which are set by default, as well as non-regulatory options. Depending on the model, the non-regulatory options can include:

- No stack-tip downwash (NOSTD)
- Missing data processing routine (MSGPRO)
- Bypass the calms processing routine (NOCALM)
- Gradual plume rise (GRDRISM)
- No buoyancy-induced dispersion (NOBID)
- Air Toxics Options (TOXICS)
- By-pass date checking for non-sequential met data file (**AERMOD**)
- Flat terrain (FLAT) (**AERMOD**)

The use of any non-regulatory default option(s) must be justified through a discussion in the modeling report and approved by the district before performing any modeling runs. Regulatory models that account for elevated terrain should be used when appropriate.

### 3.5 Coordinate System

Any modeling assessment will require a coordinate system to be defined in order to assess the relative distances from sources and receptors and, where necessary, to consider other geographical features. Employing a standard coordinate system for all projects increases the efficiency of the review process while providing real-world information about the site location. The AERMOD model’s terrain pre-processor, AERMAP, requires digital terrain in Universal Transverse Mercator (UTM) coordinates. The UTM system uses meters as its basic unit of measurement and allows for more precise definition of specific locations than latitude/longitude.

For more information on coordinate systems and geographical information inputs, see Section 6.

## 3.6 Averaging Times

A key advantage to the more refined air dispersion models is the ability to compare effects-based standards with appropriate averaging times. OEHHA assigns different exposure periods to different health effects. For example, cancer risks are assessed for “lifetime” exposure. Chronic noncancer health effects are calculated for long-term, but not necessarily lifetime exposures. Acute noncancer health effects are usually based on a maximum 1-hour exposure, but there are some exceptions, such as benzene which is based on a maximum 6 hour exposure. Use of effects-based averaging times enables a contaminant to be assessed using modeled exposure concentrations for the appropriate averaging period for that contaminant and endpoint.

In addition to enabling the use of appropriate model averaging times, refined models allow the input of variable emission rates, where appropriate, for assessing concentrations over different averaging times. That is, a source that operates only during certain hours of the day can be modeled using only those hours of meteorology data.

The ability to assess air quality using the most appropriate effects-based averaging time means the refined air dispersion models provide a more representative assessment of health and environmental impacts of air emissions from a facility.

## 3.7 Defining Sources

### 3.7.1 Point, Area, Volume, and Flare Emissions Release Parameters Required for each Model

The U.S. EPA SCREEN3, ISCST3, ISC-PRIME and AERMOD models support a variety of source types that can be used to characterize most emissions within a study area. The following sections outline the primary source types and their input requirements for both screening and refined models. Detailed descriptions on the input fields for these models can be found for SCREEN3 in U.S. EPA<sup>18</sup>, for ISC-PRIME in U.S. EPA<sup>19,20</sup>, and for AERMOD in U.S. EPA<sup>21</sup>.

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<sup>18</sup> U.S. Environmental Protection Agency, 1995. SCREEN3 Model User's Guide. EPA-454/B-95-004. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>19</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models (Revised), Volume 1. EPA-454/B-95-003a. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>20</sup> U.S. Environmental Protection Agency, 1997. Addendum to ISC3 User's Guide – The Prime Plume Rise and Building Downwash Model. Submitted by Electric Power Research Institute. Prepared by Earth Tech, Inc., Concord, MA.

<sup>21</sup> Cimorelli, A.J., S.G. Perry, A. Venkatram, J.C. Weil, R.J. Paine, R.B. Wilson, R.F. Lee, W.D. Peters, R.W. Brode, J.O. Paumier, 2002: AERMOD: Description of Model Formulation. U.S. Environmental Protection Agency, EPA-454/R-02-002d (draft dated October 31, 2002). Available from <http://www.epa.gov/scram001>.

### 3.7.1.1 Point Sources

Point sources are typically used when modeling releases from sources like stacks and isolated vents. Input requirements for point sources include:

#### SCREEN3

- **Emission Rate** [g/sec]: The emission rate of the pollutant.
- **Stack Height** [m]: The stack height above ground.
- **Stack Inside Diameter** [m]: The inner diameter of the stack.
- **Stack Gas Exit Velocity** [m/s] or **Stack Gas Exit Flow Rate** [m<sup>3</sup>/s]: Either the stack gas exit velocity or the stack gas exit flow rate should be given. The exit velocity can be determined from the following formula:

$$V_s = 4 * V / (\pi * (d_s^2))$$

Where,

$V_s$  = Exit Velocity

$V$  = Flow Rate

$d_s$  = Stack Inside Diameter

- **Stack Gas Temperature** [K]: The temperature of the released gas in degrees Kelvin.
- **Ambient Air Temperature** [K]: The average atmospheric temperature (K) in the vicinity of the source. If no ambient temperature data are available, assume a default value of 293 degrees Kelvin (K). For non-buoyant releases, the user should input the same value for the stack temperature and ambient temperature.

#### AERMOD/ISCST/ISC-PRIME

- **Source ID**: An identification name for the source being defined, up to 8 characters in length.
- **X Coordinate**: The x (east-west) coordinate for the source location in meters (center of the point source).
- **Y Coordinate**: Enter here the y (north-south) coordinate for the source location in meters (center of the point source).
- **Base Elevation** [m]: The source base elevation. The model only uses the source base elevation if Elevated terrain is being used.
- **Release Height above Ground** [m]: The source release height above the ground in meters.
- **Emission Rate** [g/sec]: The emission rate of the pollutant in grams per second. **Stack Gas Exit Temperature** [K]: The temperature of the released gas in degrees Kelvin.
- **Stack Gas Exit Velocity** [g/sec]: The stack gas exit velocity in meters per second or the stack gas flow rate (see above section on SCREEN3).
- **Stack Inside Diameter** [m]: The inner diameter of the stack.

### 3.7.1.2 Area Sources

Area sources are used to model releases that occur over an area (e.g., landfills, storage piles, slag dumps, and lagoons). SCREEN3 allows definition of a rectangular area, aligned with the north-

south axes, while the ISC-PRIME and AERMOD models accept rectangular areas that may also have a rotational angle specified relative to a north-south orientation, as well as a variety of other shapes.

## SCREEN3

- **Emission Rate** [ $\text{g}/(\text{s}\cdot\text{m}^2)$ ]: The emission rate of the pollutant. The emission rate for area sources is input as an emission rate per unit area ( $\text{g}/(\text{s}\cdot\text{m}^2)$ ).
- **Source Release Height** [m]: The source release height above ground.
- **Longer Side Length of Rectangular Area** [m]: The longer side of the rectangular source in meters.
- **Shorter Side Length of Rectangular Area** [m]: The shorter side of the rectangular source in meters.
- **Wind Direction Search Option**: Since the concentration at a particular distance downwind from a rectangular area is dependent on the orientation of the area relative to the wind direction, the SCREEN model provides the user with two options for treating wind direction. The regulatory default option is “yes” which results in a search of a range of wind directions. See U.S. EPA<sup>22</sup> for more detailed information.

## AERMOD/ISC-PRIME

- **Source ID**: An identification name for the source being defined, up to 8 characters in length.
- **X Coordinate**: The x (east-west) coordinate for the vertex (corner) of the area source that occurs in the southwest quadrant of the source. Units are in meters.
- **Y Coordinate**: The y (north-south) coordinate for the vertex (corner) of the area source that occurs in the southwest quadrant of the source. Units are in meters.
- **Base Elevation** [m]: The source base elevation. The model only uses the source base elevation if elevated terrain is being used. The default unit is meters.
- **Release Height above Ground** [m]: The release height above ground in meters.
- **Emission Rate** [ $\text{g}/(\text{s}\cdot\text{m}^2)$ ]: Enter the emission rate of the pollutant. The emission rate for Area sources is input as an emission rate per unit area. The same emission rate is used for both concentration and deposition calculations.
- **Options for Defining Area**: In ISC-PRIME the only option for defining the area is a rectangle or square. The maximum length/width aspect ratio for area sources is 10 to 1. If this is exceeded, then the area should be divided to achieve a 10 to 1 aspect ratio (or less) for all sub-areas. See U.S. EPA<sup>23</sup> for more details on inputting area data. In addition to the rectangular area, AERMOD can have circular or polygon areas defined (see U.S. EPA<sup>24</sup> for details).

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<sup>22</sup> U.S. Environmental Protection Agency, 1995. Quality Assurance Handbook for Air Pollution Measurement Systems. Vol. IV, Meteorological Measurements. EPA/600/R-94/038d, U.S. Environmental Protection Agency, Research Triangle Park, NC 27711. Also available from the following website as of February 2003: <http://www.epa.gov/scram001>.

<sup>23</sup> U.S. Environmental Protection Agency, 1995. User's Guide for the Industrial Source Complex (ISC3) Dispersion Models (Revised), Volume 1. EPA-454/B-95-003a. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>24</sup> Cimorelli, A.J., S.G. Perry, A. Venkatram, J.C. Weil, R.J. Paine, R.B. Wilson, R.F. Lee, W.D. Peters, R.W. Brode, J.O. Paumier, 2002: AERMOD: Description of Model Formulation. U.S. Environmental Protection Agency, EPA-454/R-02-002d (draft dated October 31, 2002). Available from <http://www.epa.gov/scram001>.

**Note:** There are no restrictions on the location of receptors relative to area sources. Receptors may be placed within the area and at the edge of an area. The U.S. EPA models (ISCST3, ISC-PRIME, and AERMOD) will integrate over the portion of the area that is upwind of the receptor. The numerical integration is not performed for portions of the area that are closer than 1.0 meter upwind of the receptor. Therefore, caution should be used when placing receptors within or adjacent to areas that are less than a few meters wide.

### 3.7.1.3 Volume Sources

Volume sources are used to model releases from a variety of industrial sources, such as building roof monitors, fugitive leaks from an industrial facility, multiple vents, and conveyor belts.

#### SCREEN3

- **Emission Rate** [g/sec]: The emission rate of the pollutant in grams per second (g/s).
- **Source Release Height** [m]: The source release height above ground surface at the center of the volume.
- **Initial Lateral Dimension** [m]: See Table 3.1 below for guidance on determining initial dimensions. Units are meters.
- **Initial Vertical Dimension** [m]: See Table 3.1 below for guidance on determining initial dimensions. Units are meters.

**Table 3.1 Summary of Suggested Procedures for Estimating Initial Lateral Dimension ( $y_0$ ) and Initial Vertical Dimension ( $z_0$ ) for Volume and Line Sources.**

Type of Source	Procedure for Obtaining Initial Dimension
<b>Initial Lateral Dimension</b>	
Single Volume Source	$S_{y_0} = (\text{side length})/4.3$
Line Source (Represented by Adjacent Volume Sources)	$S_{y_0} = (\text{side length})/2.15$
Line Source (Represented by Separated Volume Sources)	$S_{y_0} = (\text{center to center distance})/2.15$
<b>Initial Vertical Dimension</b>	
Surface-Based Source ( $h_e \sim 0$ )	$S_{z_0} = (\text{vertical dimension of source})/2.15$
Elevated Source ( $h_e > 0$ ) on or Adjacent to a Building	$S_{z_0} = (\text{building height})/2.15$
Elevated Source ( $h_e > 0$ ) not on or Adjacent to a Building	$S_{z_0} = (\text{vertical dimension of source})/4.3$

## AERMOD/ISCST3/ISC-PRIME

- **Source ID:** An identification name for the source being defined, up to 8 characters in length.
- **X Coordinate:** The x (east-west) coordinate for the source location in meters. This location is the center of the volume source.
- **Y Coordinate:** The y (north-south) coordinate for the source location in meters. This location is the center of the volume source.
- **Base Elevation [m]:** The source base elevation. The model only uses the source base elevation if elevated terrain is being used. The default unit is meters.
- **Release Height above Ground [m]:** The release height above ground surface in meters (center of volume).
- **Emission Rate [g/s]:** The emission rate of the pollutant in grams per second. The same emission rate is used for both concentration and deposition calculations.
- **Length of Side [m]:** The length of the side of the volume source in meters. The volume source cannot be rotated and has the X side equal to the Y side (square).
- **Building Height (If On or Adjacent to a Building) [m]:** If your volume source is elevated and is on or adjacent to a building, then you need to specify the building height. The building height can be used to calculate the Initial Vertical Dimension of the source. Note that if the source is surface-based, then this is not applicable.
- **Initial Lateral Dimension [m]:** This parameter is calculated by choosing the appropriate condition in Table 3.1 above. This table provides guidance on determining initial dimensions. Units are in meters.
- **Initial Vertical Dimension [m]:** This parameter is calculated by choosing the appropriate condition in Table 3.1 above. This table provides guidance on determining initial dimensions. Units are in meters.

### 3.7.2 Source Grouping

Source groups enable modeling results for specific groups of one or more sources. The default in AERMOD and ISCST3/ISC-PRIME is the creation of a source group “ALL” that considers all the sources at the same time.

Analysis of individual groups of sources can be performed by using the SRCGROUP option. One example may be assigning each source to a separate source group to determine the maximum concentration generated by each individual source.

### 3.7.3 Special Considerations

During some air quality studies, modelers may encounter certain source configurations that require special attention. Some examples include horizontal sources or emissions from storage tanks. The following sections outline modeling techniques to account for the special characteristics of such scenarios.

### 3.7.3.1 Multiple Stacks

When the plumes from multiple closely spaced stacks or flues merge, the plume rise can be enhanced. Briggs<sup>25</sup> has proposed equations to account for this. The reader is referred to that document for further details. Most models do not explicitly account for enhanced plume rise from this cause, and most regulatory agencies do not permit it to be accounted for in regulatory applications of modeling, with one exception. That exception is the case of a single stack with multiple flues/multiple stacks very close together (less than one stack diameter apart). In these cases, the multiple plumes may be treated as a single plume. To do this, a pseudo stack diameter is used in the calculations, such that the total volume flow rate of the stack gases is correctly represented.

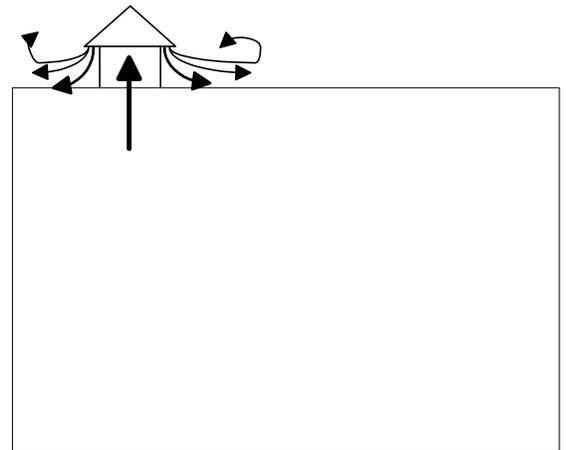
### 3.7.3.2 Horizontal Sources and Rain Caps

This section is intended to provide guidance for modeling a stack with a rain cap that is located on top of a building.

When emissions are released through a stack with a rain cap, the rain cap redirects the vertical release into a horizontal release, as shown in Figure 3.4.

The presence of a rain cap or any obstacle at the top of the stack hinders the momentum of the exiting gas. Therefore, assuming that the gas exit velocity would be the same as the velocity in a stack without an obstacle is an improper assumption. The extent of the effect is a function of the distance from the stack exit to the obstruction and of the dimensions and shape of the obstruction.

On the conservative side, the stack could be modeled as having a non-zero, but negligible exiting velocity, effectively eliminating any momentum rise. Such an approach would result in final plume heights closer to the ground and therefore higher concentrations nearby.



**Figure 3.4**

Plume buoyancy is not strongly reduced by the occurrence of a rain cap. Therefore if the plume rise is dominated by buoyancy, it is not necessary to adjust the stack conditions. (The air dispersion models determine plume rise by either buoyancy or momentum, whichever is greater.)

The stack conditions should be modified when the plume rise is dominated by momentum and in the presence of a rain cap or a horizontal stack. Sensitivity studies with the SCREEN3 model, on a case-by-case basis, can be used to determine whether plume rise is dominated by buoyancy or momentum. The District should be consulted before applying these procedures.

<sup>25</sup> Briggs, G.A., 1974. Diffusion Estimation for Small Emissions. In ERL, ARL USAEC Report ATDL-106. U.S. Atomic Energy Commission, Oak Ridge, TN.

- Set exit velocity to 0.001 m/sec
- Turn stack tip downwash off
- Reduce stack height by 3 times the stack diameter

Stack tip downwash is a function of stack diameter, exit velocity, and wind speed. The maximum stack tip downwash is limited to three times the stack diameter in the ISC3 air dispersion model. In the event of a horizontal stack, stack tip downwash should be turned off and no stack height adjustments should be made.

Note: This approach may not be valid for large (several meter) diameter stacks.

An alternative, more refined, approach could be considered for stack gas temperatures which are slightly above ambient (e.g., ten to twenty degrees Fahrenheit above ambient). In this approach, the buoyancy and the volume of the plume remains constant and the momentum is minimized.

- Turn stack tip downwash off
- Reduce stack height by 3 times the stack diameter ( $3D_o$ )
- Set the stack diameter ( $D_b$ ) to a large value (e.g., 10 meters)
- Set the stack velocity to  $V_b = V_o (D_o/D_b)^2$

Where:

$V_o$  and  $D_o$  are the original stack velocity and diameter, and  
 $V_b$  and  $D_b$  are the alternative stack velocity and diameter for constant buoyancy.

This approach is advantageous when  $D_b \gg D_o$  and  $V_b \ll V_o$  and should only be used with District approval.

Reference: Technical Support Document for Exposure and Stochastic Analysis, Office of Environmental Health Hazard Assessment, September 2000, p. 2-39 and p. 2-40.

### **3.7.3.3 Modeling Bay Door or Window Openings (Volume Source)**

This section is intended to provide guidance for modeling openings such as doors and windows as a volume source. When determining how to model an opening, first determine how the emissions are being released from the opening. If a profile of the emissions (% of substance and heat at different levels) is not provided, then assume that emissions are being released at all levels of the opening, and that the emissions are going out some distance from the opening before they are mixed with the outside air. Thus the release from the opening resembles a volume source where the height is the height of the opening, and the width is the width of the opening, and length is also the width of the opening. Volume source modeling requires the width and length to be equal.

Based on these assumptions, the height of the volume is equal to the height of the opening, the width of the volume is equal to the width of the opening, and the length of the volume is equal to the distance from the opening to the nearest edge of the building, see Figure 3.5.

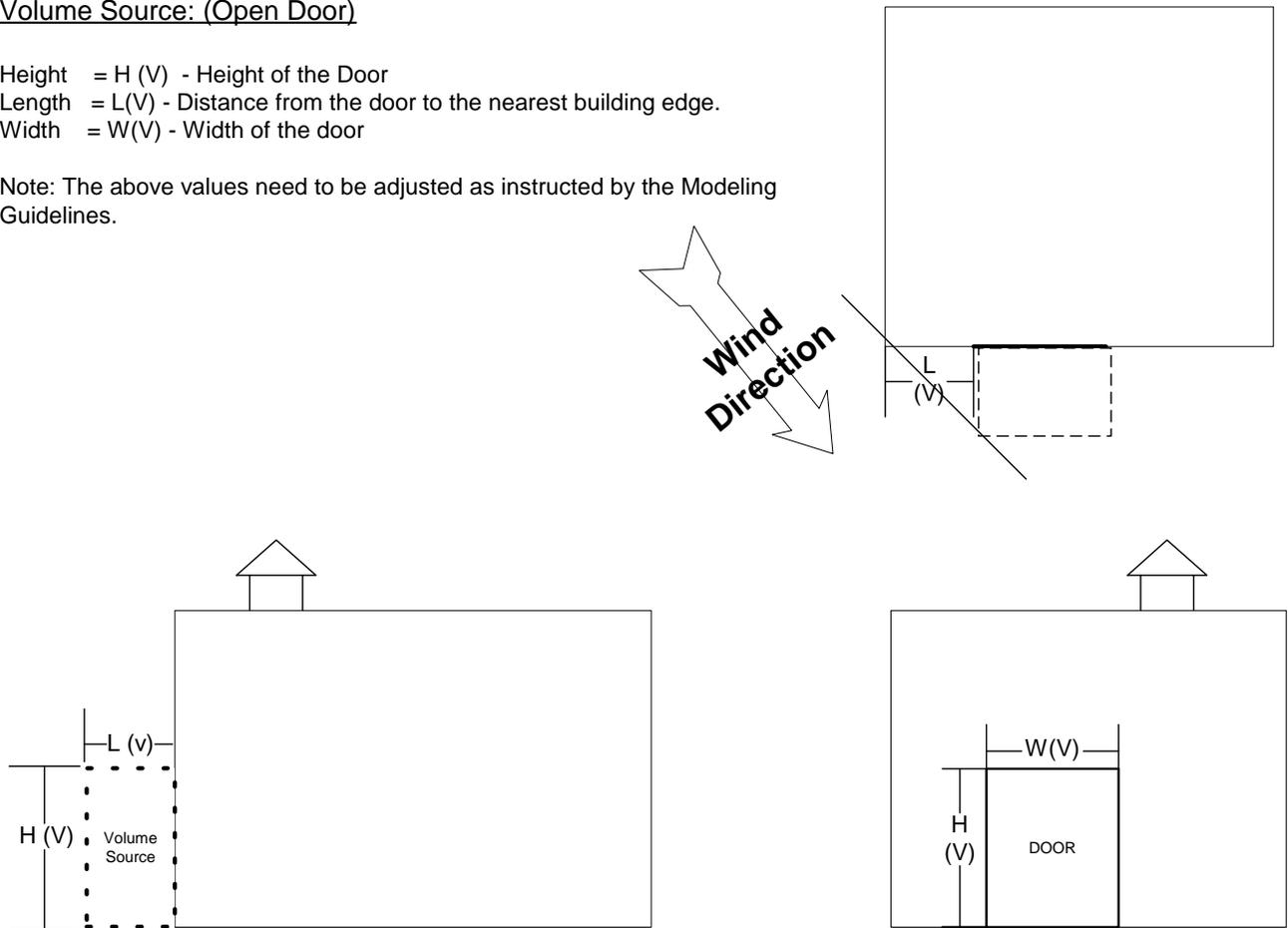
### Volume Source: (Open Door)

Height =  $H(V)$  - Height of the Door

Length =  $L(V)$  - Distance from the door to the nearest building edge.

Width =  $W(V)$  - Width of the door

Note: The above values need to be adjusted as instructed by the Modeling Guidelines.



**Figure 3.5**

### **3.7.3.4 Liquid Storage Tanks**

Storage tanks are generally of two types—fixed roof tanks and floating roof tanks. In the case of fixed roof tanks, most of the pollutant emissions occur from a vent, with some additional contribution from hatches and other fittings. In the case of floating roof tanks, most of the pollutant emissions occur through the seals between the roof and the wall and between the deck and the wall, with some additional emissions from fittings such as ports and hatches.

Approaches for modeling impacts from emissions from various types of storage tanks are outlined below.

#### **Fixed roof tanks:**

Model fixed roof tanks as a point (stack) source (representing the vent), which is usually in the center of the tank, and representing the tank itself as a building for downwash calculations.

#### **Floating roof tanks:**

Model floating roof tanks as a circle of eight (or more) point sources, representing the tank itself as a building for downwash calculations. Distribute the total emissions equally among the circle of

point sources. Additionally, a floating roof tanks can be modeled as a circle (polygon) area source representing the diameter of the tank with a height of the tank.

**All tanks:**

There is virtually no plume rise from tanks. Therefore, the stack parameters for the stack gas exit velocity and stack diameter should be set to near zero for the stacks representing the emissions. In addition, stack temperature should be set equal to the ambient temperature. This is done in ISCST3 and AERMOD by inputting a value of 0.0 for the stack gas temperature.

Note that it is very important for the diameter to be at or near zero. With low exit velocities and larger diameters, stack tip downwash will be calculated. Since all downwash effects are being calculated as building downwash, the additional stack tip downwash calculations would be inappropriate. Since the maximum stack tip downwash effect is to lower plume height by three stack diameters, a very small stack diameter effectively eliminates the stack tip downwash.

**Table 3.2 - Stack parameter values for modeling tanks**

Velocity	Diameter	Temperature
Near zero i.e. 0.001 m/s	Near zero i.e. 0.001m	Ambient – 0.0 sets models to use ambient temperature

### 3.7.4 Variable Emissions

The ISCST3 and AERMOD models both contain support for variable emission rates. This allows for modeling of source emissions that may fluctuate over time. Emission variations can be characterized across many different periods including hourly, daily, monthly and seasonally. For risk assessments, only the annual average or the maximum hourly emission rates are to be modeled. If a variable emission rate is to be used, the District must be consulted.

#### 3.7.4.1 Wind Erosion

Modeling of emissions from sources susceptible to wind erosion, such as coal piles, can be accomplished using variable emissions.

The ISCST3 and AERMOD models allow for emission rates to be varied by wind speed. This allows for more representative emissions from sources that are susceptible to wind erosion, particularly waste piles that can contribute to particulate emissions. Once a correlation between emissions and wind speed categories is established, the models will then vary the emissions based on the wind conditions in the meteorological data.

#### 3.7.4.2 Non-Continuous Emissions

Sources of emissions at some locations may emit only during certain periods of time. Emissions can be varied within the ISCST3 and AERMOD models by applying factors to different time periods.

For example, for a source that is non-continuous, a factor of 0 is entered for the periods when the source is not operating or is inactive. Model inputs for variable emissions rates can include the following time periods:

- Seasonally
- Monthly
- Hourly
- By Season and hour-of-day
- By Season, hour-of-day, and day-of-week
- By Season, hour, and week

### 3.7.4.3 Plant Shutdowns and Start-Ups

Plant start-ups and shutdowns can occur due to maintenance, designated vacation periods, or upset conditions. Emissions during shutdown and startup are usually higher than during normal operation. Process upsets or control equipment breakdowns can also increase emissions. Such upsets can result in the release of uncontrolled emissions. The ISC and AERMOD models allow the use of variable emission rates for hours of the day, day of the week, and season of the year. The example below illustrates the use of this feature to model emissions that vary by the time of the day.

**Example:**

Assume that a gas turbine operates 14 hours per day (1 startup, 1 shutdown, and 12 hours of normal operation)

**Given:**

Emission Rate = 1 g/s (emissions rate during normal operation)

Operation Schedule = 6 AM – 8PM

Startup/Shutdown Emissions are twice that of normal operating emissions

The model will adjust the emissions rate using the data found in the table below:

**Calculation:**

Modeled Emissions Rate \* Emission Rate Adjustment Factor

Emissions Rate for 1 AM – 6 AM = 1 g/s \* 0 = 0 g/s

Emissions Rate for 6 AM – 7 AM = 1 g/s \* 2 = 2 g/s

Emissions Rate for 7 AM – 7 PM = 1 g/s \* 1 = 1 g/s

Emissions Rate for 7 PM – 8 PM = 1 g/s \* 2 = 2 g/s

### Non-Continuous Emissions (Hours of Day):

Morning Hours		Afternoon Hours	
Hour of the Day	Emissions Rate Adjustment Factor	Hour of the Day	Emissions Rate Adjustment Factor
1:00 am	0	1:00 pm	1
2:00 am	0	2:00 pm	1
3:00 am	0	3:00 pm	1
4:00 am	0	4:00 pm	1
5:00 am	0	5:00 pm	1
6:00 am	2	6:00 pm	1
7:00 am	1	7:00 pm	2
8:00 am	1	8:00 pm	0
9:00 am	1	9:00 pm	0
10:00 am	1	10:00 pm	0
11:00 am	1	11:00 pm	0
Noon	1	Midnight	0

### 3.7.4.4 Seasonal Variations

Industrial processes often fluctuate depending on supply and demand requirements. This affects some sectors seasonally, particularly facilities involved in food processing. For example, soup production makes use of agricultural produce which is at its highest in the late summer. Production schedules for soup production typically ramp up resulting in different emissions during the late summer and early fall than at mid to late winter.

These emission differences can be accounted for by the application of variable emission factors, with control over the following time periods:

- By Season and hour-of-day
- By Season, hour-of-day, and day-of-week
- By Season, hour, week

### 3.8 Building Impacts

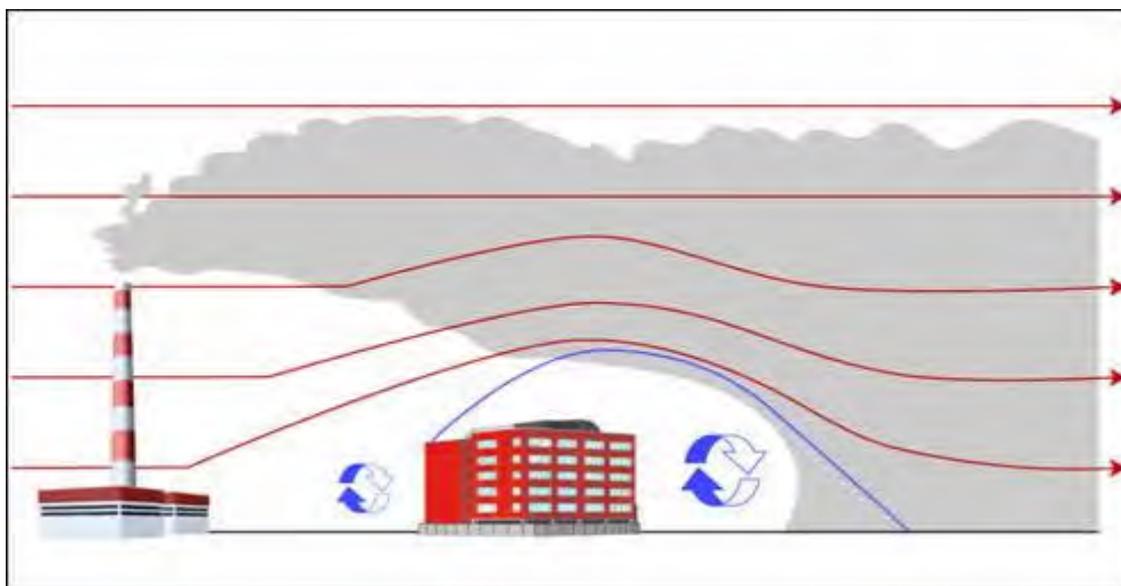
Buildings and other structures near a relatively short stack can have a substantial effect on plume transport and dispersion, and on the resulting ground-level concentrations that are observed. . There has long been a “rule of thumb” that a stack should be at least 2.5 times the height of adjacent buildings. Beyond that, much of what is known of the effects of buildings on plume transport and diffusion has been obtained from wind tunnel studies and field studies.

When the airflow meets a building (or other obstruction), it is forced up and over the building. On the lee side of the building, the flow separates, leaving a closed circulation containing lower wind

speeds. Farther downwind, the air flows downward again. In addition, there is more shear and, as a result, more turbulence. This is the turbulent wake zone (see Figure 3.6).

If a plume gets caught in the cavity, very high concentrations can result. If the plume escapes the cavity, but remains in the turbulent wake, it may be carried downward and dispersed more rapidly by the turbulence. This can result in either higher or lower concentrations than would occur without the building, depending on whether the reduced height or increased turbulent diffusion has the greater effect.

The height to which the turbulent wake has a significant effect on the plume is generally considered to be about the building height plus 1.5 times the lesser of the building height or width. This results in a height of 2.5 building heights for cubic or squat buildings, and less for tall, slender buildings. Since it is considered good engineering practice to build stacks taller than adjacent buildings by this amount, this height came to be called “good engineering practice” (GEP) stack height.



**Figure 3.6 - The building downwash concept where the presence of buildings forms localized turbulent zones that can readily force pollutants down to ground level.**

### **3.8.1 Good Engineering Practice (GEP) Stack Heights and Structure Influence Zones**

The U.S. EPA<sup>26</sup> states that “If stacks for new or existing major sources are found to be less than the height defined by the EPA’s refined formula for determining GEP height, then air quality impacts associated with cavity or wake effects due to the nearby building structures should be determined.”

The U.S. EPA’s refined formula for determining GEP stack height is:

$$\text{GEP Stack Height} = H + 1.5L$$

<sup>26</sup> U.S. Environmental Protection Agency, 1990. Stack Heights, Section 123, Clean Air Act, 40 CFR Part 51. U. S. Environmental Protection Agency, Research Triangle Park, NC.

where,

GEP = Good Engineering Practice

H = Building/Tier Height measured from ground to the highest point

L = Lesser of the Building Height (PB) or Projected Building Width (PBW)

Building downwash for point sources that are within the Area of Influence of a building should be considered. For U.S. EPA regulatory applications, a building is considered sufficiently close to a stack to cause wake effects when the distance between the stack and the nearest part of the building is less than or equal to five (5) times the lesser of the building height or the projected width of the building.

$$\text{Distance}_{\text{stack-bldg}} \leq 5L$$

For point sources within the Area of Influence, building downwash information (direction-specific building heights and widths) should be included in your modeling project. Using BPIP-PRIME, you can compute these direction-specific building heights and widths.

**Structure Influence Zone (SIZ):** For downwash analyses with direction-specific building dimensions, wake effects are assumed to occur if the stack is within a rectangle composed of two lines perpendicular to the wind direction, one at 5L downwind of the building and the other at 2L upwind of the building, and by two lines parallel to the wind direction, each at 0.5L away from each side of the building, as shown below. L is the lesser of the height or projected width. This rectangular area has been termed a Structure Influence Zone (SIZ). Any stack within the SIZ for any wind direction is potentially affected by GEP wake effects for some wind direction, or range of wind directions, see Figure 3.7 and Figure 3.8.

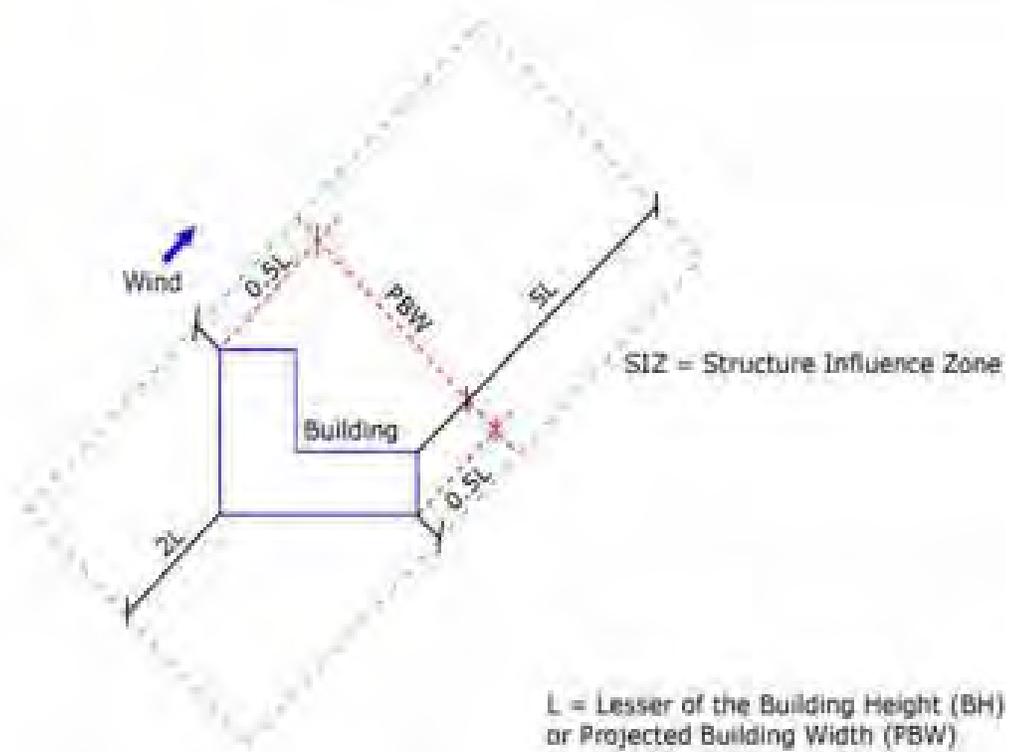


Figure 3.7 - GEP 5L and Structure Influence Zone (SIZ) Areas of Influence

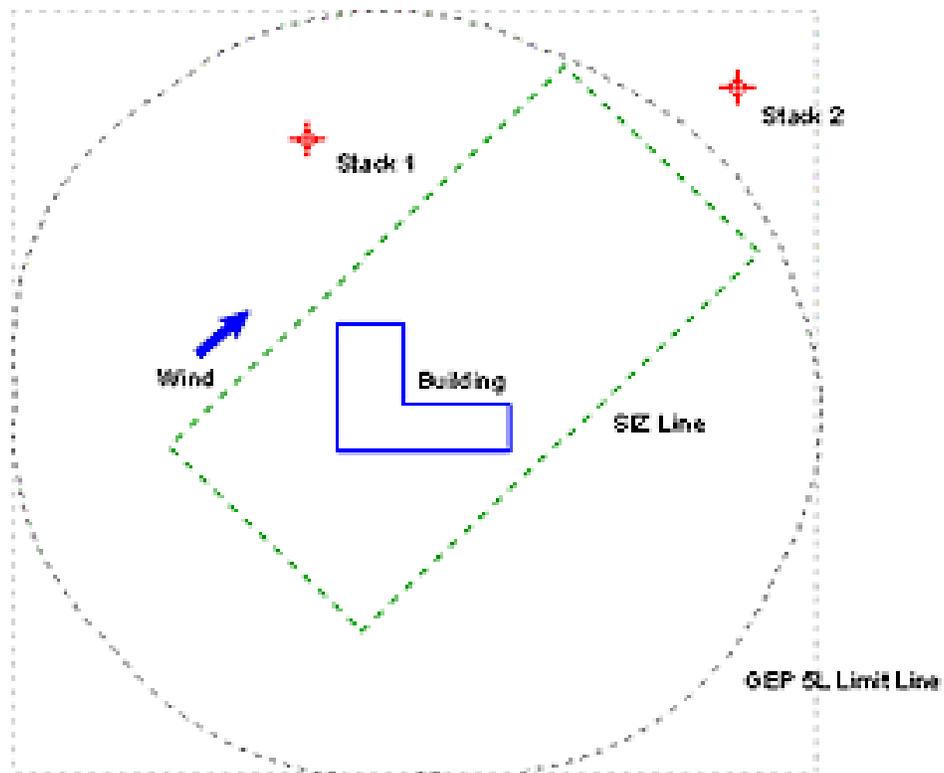


Figure 3.8 -GEP 360° 5L and Structure Influence Zone (SIZ) Areas of Influence

## 3.8.2 Defining Buildings

The recommended screening and refined models all allow for the consideration of building downwash. SCREEN3 considers the effects of a single building while AERMOD and ISCST3/ISC-PRIME can consider the effects of complicated sites consisting of up to hundreds of buildings. This results in different approaches to defining buildings as outlined below.

### 3.8.2.1 SCREEN3 Building Definition

Defining buildings in SCREEN3 is straightforward, as only one building requires definition. The following input data is needed to consider downwash in SCREEN3:

- Building Height: The physical height of the building structure in meters.
- Minimum Horizontal Building Dimension: The minimum horizontal building dimension in meters.
- Maximum Horizontal Building Dimension: The maximum horizontal building dimension in meters.

For Flare releases, SCREEN assumes the following:

- an effective stack gas exit velocity ( $V_s$ ) of 20 m/s,
- an effective stack gas exit temperature ( $T_s$ ) of 1,273 K, and
- an effective stack diameter based on the heat release rate.

Since building downwash estimates depend on transitional momentum plume rise and transitional buoyant plume rise calculations, the selection of effective stack parameters could influence the estimates. Therefore, building downwash estimates for flare releases should be used with extra caution<sup>27</sup>.

If using Automated Distances or Discrete Distances option, wake effects are included in any calculations made. Cavity calculations are made for two building orientations, first with the minimum horizontal building dimension along wind, and second with the maximum horizontal dimension along wind. The cavity calculations are summarized at the end of the distance-dependent calculations (see SCREEN3 User's Guide<sup>32</sup> Section 3.6 for more details).

### 3.8.2.2 AERMOD and ISC-PRIME Building Definition

The inclusion of the PRIME (Plume Rise Model Enhancements) algorithm<sup>28</sup> to compute building downwash has produced more accurate results in air dispersion models. Unlike the earlier algorithms used in ISC3, the PRIME algorithm:

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<sup>27</sup> U.S. Environmental Protection Agency, 1995. SCREEN3 Model User's Guide. EPA-454/B-95-004. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

<sup>28</sup> Schulman, L.L., D.G. Strimaitis and J.S. Scire, 2000: Development and evaluation of the PRIME plume rise and building downwash model. Journal of the Air & Waste Management Association, 50:378-390.

- accounts for the location of the stack relative to the building;
- accounts for the deflection of streamlines up over the building and down the other side;
- accounts for the effects of the wind profile at the plume location for calculating plume rise;
- accounts for pollutants captured in the recirculation cavity to be transported to the far wake downwind (this is ignored in the earlier algorithms); and
- avoids discontinuities in the treatment of different stack heights, which were a problem in the earlier algorithms.

Refined models allow for the consideration of downwash effects from multiple buildings. AERMOD and ISCST3/ISC-PRIME require building downwash analysis to first be performed using BPIP-PRIME<sup>28</sup>. The results from BPIP-PRIME can then be incorporated into the modeling studies for consideration of downwash effects.

The U.S. EPA Building Profile Input Program – Plume Rise Model Enhancements (BPIP-PRIME) was designed to incorporate enhanced downwash analysis data for use with the U.S. EPA ISC-PRIME and current AERMOD models. Similar in operation to the U.S. EPA BPIP model, BPIP-PRIME uses the same input data requiring no modifications of existing BPIP projects. The following information is required to perform building downwash analysis within BPIP:

- X and Y location for all stacks and building corners.
- Height for all stacks and buildings (meters). For building with more than one height or roofline, identify each height (tier).
- Base elevations for all stacks and buildings.

The BPIP User's Guide<sup>29</sup> provides details on how to input building and stack data to the program.

The BPIP model is divided into two parts.

- Part One: Based on the GEP technical support document<sup>30</sup>, this part is designed to determine whether or not a stack is subject to wake effects from a structure or structures. Values are calculated for GEP stack height and GEP related building heights (BH) and projected building widths (PBW). Indication is given to which stacks are being affected by which structure wake effects.
- Part Two: Calculates building downwash BH and PBW values based on references by Tickvart<sup>31,32</sup> and Lee<sup>33</sup>. These can be different from those calculated in Part One. The calculations are performed only if a stack is being influenced by structure wake effects.

In addition to the standard variables reported in the output of BPIP, BPIP-PRIME adds the following:

- BUILDLEN: Projected length of the building along the flow.

<sup>29</sup> U.S. Environmental Protection Agency, 1995. User's Guide to the Building Profile Input Program, EPA-454/R-93-038, Office of Air Quality Planning and Standards, Research Triangle Park, N.C.

<sup>30</sup> U.S. Environmental Protection Agency, 1985. Guideline for Determination of Good Engineering Practice Stack Height (Technical Support Document for the Stack Height Regulations) – Revised EPA-450/4-80-023R, U.S. Environmental Protection Agency, Research Triangle Park, NC.

<sup>31</sup> Tickvart, J. A., May 11, 1988. Stack-Structure Relationships, Memorandum to Richard L. Daye, U.S. EPA.

<sup>32</sup> Tickvart, J. A., June 28, 1989. Clarification of Stack-Structure Relationships, Memorandum to Regional Modeling Contacts, Regions I-X, U.S. EPA.

<sup>33</sup> Lee, R. F., July 1, 1993. Stack-Structure Relationships – Further clarification of our memoranda dated May 11, 1988 and June 28, 1989, Memorandum to Richard L. Daye, U.S. EPA.

- XBADJ: Along-flow distance from the stack to the center of the upwind face of the projected building.
- YBADJ: Across-flow distance from the stack to the center of the upwind face of the projected building.

For a more detailed technical description of the EPA BPIP-PRIME model and how it relates to the EPA ISC-PRIME model see the Addendum to ISC3 User's Guide<sup>34</sup>.

## 3.9 Multiple Pollutants

### 3.9.1 Modeling Multiple Pollutants from Multiple Sources

Industrial processes often emit multiple pollutants through one or several emission sources. The U.S. EPA models are not equipped to automatically perform modeling of different pollutants that may share the same emission source but have unique emission rates.

Traditional approaches to this scenario resulted in modelers performing separate model runs for each specific pollutant type, even though all other model site parameters remain the same. For projects consisting of many pollutants, this approach results in the modeler needing not only to be extremely organized but also requires high levels of computer resources as the project would need to be run separately for each pollutant scenario.

An alternative approach is applying unitized emission rate and summation concepts, which drastically reduce the computational time for large multiple pollutant projects.

#### 3.9.1.1 Standard Approaches to Modeling Multiple Toxic Pollutants from Multiple Sources

For industrial processes that emit multiple pollutants through one or several emission sources, the following approach should be followed.

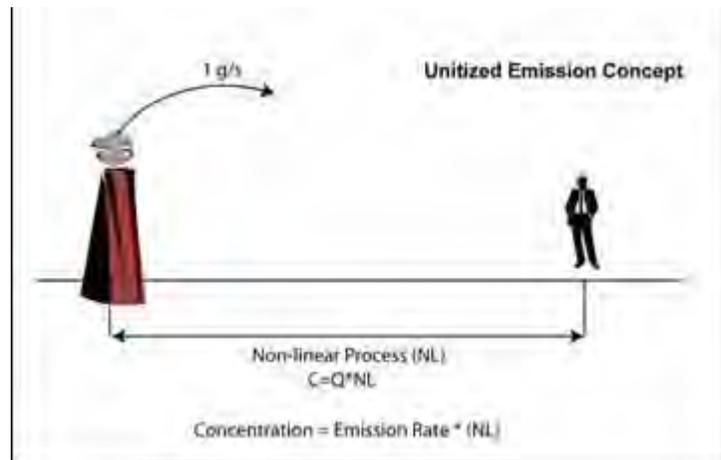
- Dispersion modeling should be conducted as outlined in this guidance document using a unit (normalized) emissions rate of 1 g/s, or 1/g/s/m<sup>2</sup> for area sources.
- All chemical analysis / risk calculations should be processed through the CARB HARP program <http://www.arb.ca.gov/toxics/harp/harp.htm>.
- Exceptions (Must be given prior approval by the district):
  - Analysis of multiple pollutants that only affect one acute toxicological endpoint or the same endpoints.
  - Analyses of multiple pollutants that only affect one chronic toxicological endpoint or the same endpoint and do not have a chronic oral value.
  - Analysis of multiple pollutants that are not multi-pathway (only inhalation)
    - One dispersion modeling run for

<sup>34</sup> Schulman, et al., 1997. Addendum - User's Guide for the Industrial Source Complex (ISC3) Dispersion Models, Volume 1. Office of Air Quality Planning and Standards, Research Triangle Park, NC.

- Acute Hazard Index,
- Chronic Hazard Index, and
- Cancer Risk.

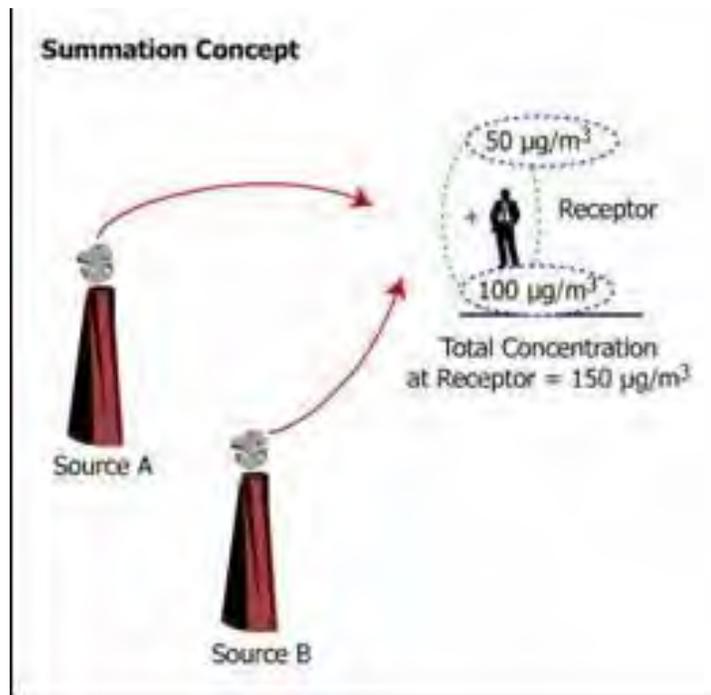
### 3.9.2 Unitized (Normalized) Emission Rate and Summation Concepts

It is a well-known fact that air dispersion modeling is a non-linear process. The modeled site may have random meteorological variations, the dispersion process is non-linear, and the terrain elevations at the site may assume unlimited shapes. However, once the calculations to a receptor in space are complete, all chemical concentration levels vary linearly with their source release rate. Figure 3.9 helps visualize this concept, by describing an emission rate of 1 g/s.



**Figure 3.9 - Unitized Emission Rate Concept (1 g/s)**

The Unitized Emission Rate Concept only applies to single sources. For assessments with multiple sources the authors recommend that each source be modeled independently, using unitized emission rate (1 g/s). The concentration at the receptor can then be multiplied by the actual chemical emission rate, and the final result from all the sources will be superimposed. This is called the Summation Concept, where the concentration and deposition fluxes at a receptor are the linear addition of the resulting values from each source. Figure 3.10 depicts the Summation concept.



**Figure 3.10 - The Summation Concept for two sources**

A post-processor is needed to effectively process model results that have been performed using unitized emission rate and summation concepts. Final output will provide results for pollutant specific scenarios from multiple sources.

### 3.10 Modeling Roads

There are a number of dispersion models that can be used to predict concentrations from roadway emissions. Some models such as CAL3QHCR were developed solely for use in modeling roadway emissions. They use a line source algorithm. CAL3QHCR is a preferred/recommended U.S. Environmental Protection Agency (EPA) model for roadway modeling that uses local meteorology. EPA also recommends the CALINE3 model. But, CALINE3 does not use local meteorology. It is included in CAL3QHCR. The Industrial Source Complex – Short-Term (ISCST3) and the AERMOD models can be used to model roadways as a line of volume sources. AERMOD is the recommended EPA model. However, some Districts still use ISCST3 because they do not yet have the meteorological data needed for AERMOD. The methodology for modeling using AERMOD is the same as that for using ISCST3. The input data is almost identical because AERMOD was designed to use input similar to that used by ISCST3 and to provide similar outputs. The major differences between the inputs to the two models are the meteorological data sets. During the preparation of this guideline, an analysis was conducted to compare concentrations predicted by all three models for a specific example. This analysis showed that all three models provided similar concentration estimates, and that any of the three models could be used effectively to predict pollutant concentrations and the resulting risk from roadway emissions.

In the discussion below, use of CAL3QHCR is described first. That discussion includes a description of data sources to estimate emissions. The same approach can be used to develop emissions estimates for ISCST3/AERMOD.

## 3.10.1 Modeling Roads using CAL3QHCR

### 3.10.1.1 Introduction

This step by step guidance explains how to use the CAL3QHCR line source model to carry out diesel particulate matter air dispersion modeling, and how to calculate potential cancer risk. Nine potential receptors are assumed to lie directly south of an east-west free-flow freeway with a peak hour traffic count of 11,900 vehicles. The freeway is assumed to be 120 feet wide, with an additional 10 feet on each side to account for the wake of moving vehicles<sup>35</sup>, making for a total link width of 140 feet.

This example represents one specific scenario. For guidance on other CAL3QHCR modeling scenarios not contained herein, contact your local air district or consult the User's Guide to CAL3QHC, Version 2.0<sup>36</sup>.

### 3.10.1.2 Data Sources

This example scenario relies on basic information needed to complete the site specific HRA. Such information includes:

- meteorological data,
- traffic data (from Caltrans), later developed into hourly data,
- vehicle emissions (derived from EMFAC),
- location of the nearest sensitive receptor to the edge of the travel lane, in addition to the generic receptor locations, if required (for example, at 10, 25, 50, 100, 200, 300, 400 and 500 feet) in X-Y coordinates, and
- roadway orientation in terms of its X-Y coordinates (arbitrary origin / 0,0), including length and width.

The above information, including additional information required by the model, is further discussed in the ensuing sections of this document.

### 3.10.1.3 Finding the Peak Hour Traffic Count

The peak hour traffic count nearest to the proposed receptors is used to develop the hourly traffic count information for input into CAL3QHCR. The peak hour traffic count should be found on Caltrans's website at <http://www.dot.ca.gov/hq/traffops/saferesr/trafddata/index.htm>. Select back peak hour for projects south or west of the nearest milepost location. For projects north or east of the nearest milepost location, select ahead peak hour.

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<sup>35</sup> The mixing zone is an area where dispersion results are considered to be inaccurate.

<sup>36</sup> User's Guide to CAL3QHC Version 2.0, EPA-454/R-92-006 (Revised, with CAL3QHCR addendum), September 1995.

For the scenario considered herein, the Caltrans's data indicates a peak hour traffic count of 11,900 vehicles.

#### Running EMFAC to Produce Hourly PM10 Emissions and Data on Vehicle Miles Traveled

The most current version of EMFAC should be run to determine preliminary vehicle miles traveled (VMT) and emissions data. The VMT data will be used to develop the hourly traffic count information required by CAL3QHCR, and the PM10 exhaust emissions data will be used to determine the hourly PM10 emissions rates for input into CAL3QHCR.

The EMFAC run should be based on the following parameters:

- Year: first year of project build out,
- Season: annual,
- Burden: standard, and
- Output Frequency: hourly.

The following data from the EMFAC output file will be used:

- VMT/1000 for each hour,
- PM10 emissions for each hour.

Figure 3.11 is a screen shot of the first page of the EMFAC output file. The circled hourly data is the data that will be used.

This methodology is a **screening method** to determine the cancer risk from diesel exhaust assuming that all vehicles traveling the roadway segment are diesel vehicles.

A refinement of the emission calculations can be made by using data on percentages of truck traffic from Caltrans and assuming that all trucks are diesel. If better data is not available, 10% is sometimes assumed as the diesel truck fraction of vehicles.

To refine the emissions calculations further to account for diesel emissions from diesel trucks, and to account for the emissions of the highest priority toxic substances (1,3 butadiene, acrolein, acetaldehyde, formaldehyde, and benzene) from all vehicles, the procedure in Appendix B should be followed.

Contact the local district to determine which method should be used to estimate diesel truck travel.

Figure 3.11: Example Scenario EMFAC Output, Page 1

Version : Emfac2007 V2.3 Nov 1 2006  
 Run Date : 2008/02/06 15:08:23  
 Scen Year: 2009 -- All model years in the range 1965 to 2009 selected  
 Season : Annual  
 Area : Sacramento Metropolitan AQMD Averag  
 I/M Stat : Enhanced Interim (2005) -- Using I/M schedule for area 31 Sacramento (SV)  
 Emissions: Tons Per Hr00

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	Light Duty Passenger Cars				Light Duty Trucks				Medium Duty Trucks				Heavy Duty Trucks			Urban Buses	Motor-cycles	All Vehicles		
	Non-cat	Cat	Diesel	Total	Non-cat	Cat	Diesel	Total	Non-cat	Cat	Diesel	Total	Gasoline Trucks	Diesel Trucks	Total HD Trucks					
Vehcels	7532.	483025.	1673.	492331.	5806.	307893.	8213.	321912.	1391.	117094.	9091.	127537.	1330.	11346.	12677.	18201.	30879.	371.	34494.	100250.
VMT/1000	1.	160.	0.	162.	1.	109.	2.	112.	0.	41.	21.	63.	0.	1.	1.	50.	51.	0.	3.	391.
Index	256.	25555.	78.	25989.	198.	16328.	423.	16950.	75.	8729.	3082.	11887.	326.	1629.	1954.	965.	2920.	16.	580.	3044.
Total Organic Gas Emissions																				
Run Exh	0.01	0.01	0.00	0.02	0.01	0.01	0.00	0.02	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.03	0.04	0.00	0.01	0.10
Idle Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Start Ex	0.00	0.02	0.00	0.02	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.01	0.02	0.00	0.00	0.00	0.07
Total Ex	0.01	0.03	0.00	0.04	0.01	0.02	0.00	0.03	0.00	0.02	0.00	0.03	0.01	0.01	0.02	0.04	0.06	0.00	0.01	0.17
Diurnal	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Hot Soak	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Running	0.01	0.02	0.00	0.02	0.00	0.02	0.00	0.02	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
Resting	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
Total	0.02	0.05	0.00	0.08	0.01	0.05	0.00	0.06	0.00	0.03	0.00	0.04	0.01	0.01	0.02	0.04	0.06	0.00	0.02	0.26
Carbon Monoxide Emissions																				
Run Exh	0.10	0.36	0.00	0.45	0.08	0.31	0.00	0.39	0.05	0.14	0.02	0.20	0.01	0.01	0.03	0.15	0.18	0.00	0.14	1.37
Idle Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00	0.00	0.01
Start Ex	0.01	0.21	0.00	0.22	0.01	0.16	0.00	0.17	0.00	0.18	0.00	0.18	0.06	0.19	0.25	0.00	0.25	0.00	0.01	0.82
Total Ex	0.10	0.57	0.00	0.67	0.09	0.47	0.00	0.56	0.05	0.31	0.02	0.38	0.07	0.20	0.28	0.16	0.44	0.00	0.15	2.21
Oxides of Nitrogen Emissions																				
Run Exh	0.01	0.04	0.00	0.05	0.00	0.05	0.00	0.05	0.00	0.03	0.11	0.14	0.00	0.01	0.01	0.73	0.74	0.01	0.00	1.00
Idle Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.02
Start Ex	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.01	0.00	0.02	0.00	0.02	0.00	0.01	0.01	0.00	0.01	0.00	0.00	0.06
Total Ex	0.01	0.05	0.00	0.06	0.01	0.06	0.00	0.07	0.00	0.05	0.11	0.16	0.00	0.02	0.02	0.76	0.77	0.01	0.00	1.08
Carbon Dioxide Emissions (000)																				
Run Exh	0.00	0.06	0.00	0.06	0.00	0.05	0.00	0.05	0.00	0.03	0.01	0.04	0.00	0.00	0.00	0.09	0.09	0.00	0.00	0.25
Idle Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Start Ex	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Total Ex	0.00	0.06	0.00	0.06	0.00	0.05	0.00	0.05	0.00	0.03	0.01	0.04	0.00	0.00	0.00	0.09	0.09	0.00	0.00	0.25
PM10 Emissions																				
Run Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.03
Idle Exh	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Start Ex	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Ex	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.03
TireWear	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BrakeWear	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Total	0.00	0.01	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.04
Lead	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fuel Consumption (000 gallons)																				
Gasoline	0.08	6.49	0.00	6.57	0.07	5.48	0.08	5.55	0.03	2.91	0.00	2.94	0.03	0.13	0.16	0.00	0.16	0.02	0.07	15.22
Diesel	0.00	0.00	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	1.11	1.11	0.00	0.00	0.00	8.26	8.26	0.00	0.00	9.53

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Title : 2009 info  
 Version : Emfac2007 V2.3 Nov 1 2006  
 Run Date : 2008/02/06 15:08:23  
 Scen Year: 2009 -- All model years in the range 1965 to 2009 selected  
 Season : Annual  
 Area : Sacramento Metropolitan AQMD Averag  
 I/M Stat : Enhanced Interim (2005) -- Using I/M schedule for area 31 Sacramento (SV)  
 Emissions: Tons Per Hr01

### 3.10.1.4 Preparing the Hourly Traffic Count Data

To develop hourly traffic count values needed by CAL3QHCR, first find the highest hourly Vehicle Miles Traveled (VMT) count reported by EMFAC. Figure 3.12 shows an example. In this example, the highest hourly VMT count is 2,618,000 miles, which falls on Hour 17, 5:00 pm. Next, divide each hourly VMT value from EMFAC by the highest hourly VMT count (2,618,000 miles). Each result is known as a normalization factor.

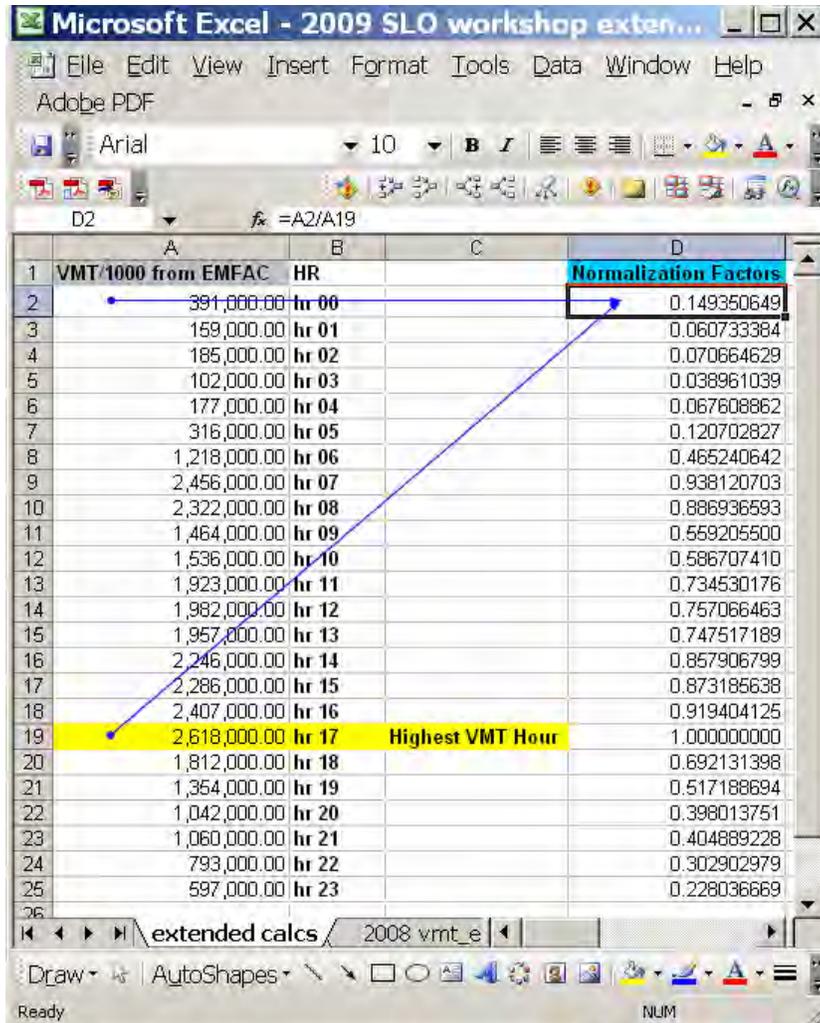


Figure 3.12: Example Scenario Development of Normalization Factors

Next multiply each normalization factor times the project’s peak hour traffic count provided in this example by Caltrans (11,900 vehicles/hour during hour 17, 5:00 pm), Table 3.3. The results are normalized hourly traffic volumes for input into CAL3QHCR.

<b>Time of day</b>	<b>Traffic Count (vehicles/hour)</b>
Hr 00	1777
Hr 01	723
Hr 02	841
Hr 03	464
Hr 04	805
Hr 05	1436
Hr 06	5536
Hr 07	11164
Hr 08	10555
Hr 09	6655
Hr 10	6982
Hr 11	8741
Hr 12	9009
Hr 13	8895
Hr 14	10209
Hr 15	10391
Hr 16	10941
<b>Hr 17</b>	<b>11900</b>
Hr 18	8236
Hr 19	6155
Hr 20	4736
Hr 21	4818
Hr 22	3605
Hr 23	2714

**Table 3. 3: Example Scenario Normalized Traffic Counts**

### **3.10.1.5 Preparing the Hourly Emissions Data**

PM10 emissions data is reported by EMFAC in tons/hour and needs to be converted to grams/hour. The grams/hour values then need to be divided by the overall VMT per hour for each hour (as reported by EMFAC), to obtain grams per vehicle mile needed for input into CAL3QHCR.

### **3.10.1.6 Defining the Calculational Domain for the Input File**

The CAL3QHCR input file requires data that defines the calculational domain. The X-Y coordinates at the beginning and at the end of the roadway section need to be defined. These have an arbitrary origin, with the y axis aligned with north.

Additionally, the width (mixing zone) of the roadway needs to be defined. Always allow for an additional 10 feet added to the edge of nearest travel lane to the receptors to account for the wake of moving vehicles.

The minimum roadway length is 10,000 feet.

The elevation of the roadway compared to the surrounding area needs to be specified. For roadways at grade the height is 0; for elevated roadways the relative height is positive; and for depressed roadways the relative height is negative.

The z-coordinate (receptor breathing height) also needs to be defined. The default recommendation is 1.5 meters, or 6 feet.

In this scenario, the freeway is 120 feet wide, and after accounting for the wake, the total link width becomes 140 feet.

The length of the roadway modeled is 10,000 feet, or 5,000 feet on each side from the center point.

The roadway is at grade.

A receptor has been placed at the edge of the roadway to define the roadway dimensions; however the dispersion results for this receptor should be discarded as they are not accurate at roadway edges. See Figure 3.13 below.

Other parameters required by the model need to be defined. Table 3.4 below discusses recommended and/or default parameters. Any changes to the default recommended values should be thoroughly explained.

East-West Roadway  
(not to scale)

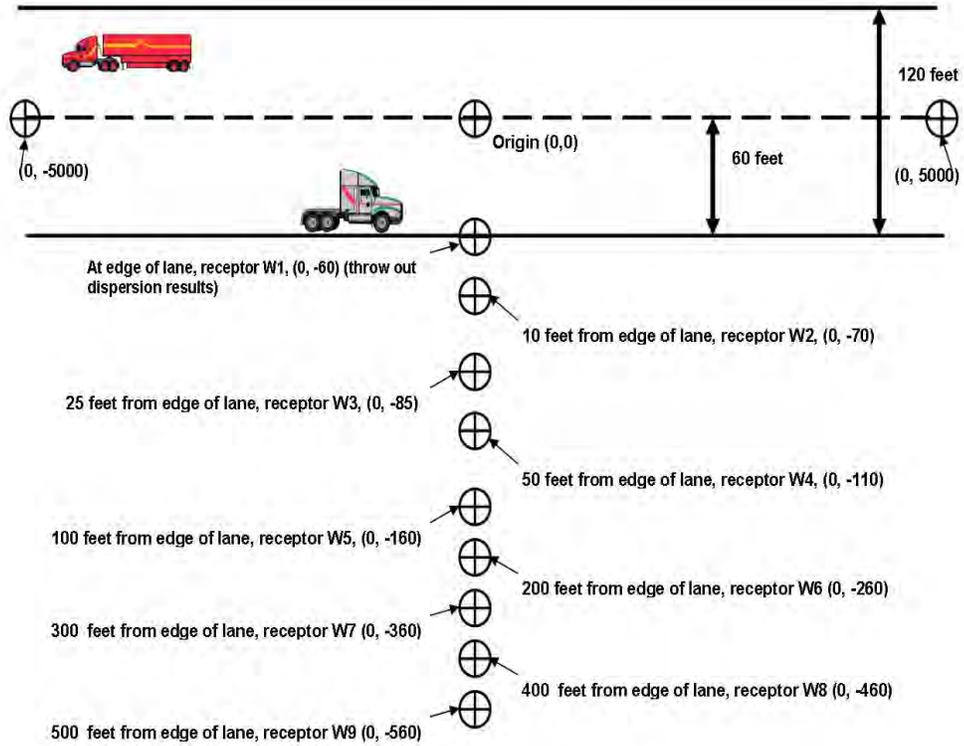


Figure 3.13: Example Scenario East-West Roadway and Receptors Illustration

**Table 3.4: Other Recommended Parameters for Input into CAL3QHCR**

Parameter	Default	
Calculation averaging time (min)	60	
Surface roughness (cm, from 3 to 400). For mixed uses and others not listed here, the modeler should make a reasonable assumption.	single family	108
	offices	170
	apartments	370
Settling velocity (cm/s)	0	
Deposition velocity (cm/s)	0	
Site setting (U=urban, R=rural)	U	
Form of traffic volume, emission rate data (1=one hour's data, 2=one week of hourly data)	2	
Pollutant (P for PM10 to give output in $\mu\text{g}/\text{m}^3$ )	P	
Hourly ambient background concentration ( $\mu\text{g}/\text{m}^3$ )	0	
Roadway height indicator (AG=at grade, FL=elevated and filled, BR=bridge, DP=depressed)	AG	
Roadway height (ft, 0 if AG, relative height if FL, BR, or DP)	0	

### 3.10.1.7 Preparing the CAL3QHCR Files

#### 3.10.2.7.1 Downloading CAL3QHCR

Download the CAL3QHCR model from EPA's Preferred/Recommended Dispersion Models website at [www.epa.gov/scram001/dispersion\\_prefrec.htm](http://www.epa.gov/scram001/dispersion_prefrec.htm). There are five files needed to run the program:

- input file (.inp),
- batch file (.bat),
- control file (.ctl),
- meteorological data file (.asc), and
- executable file (.exe).

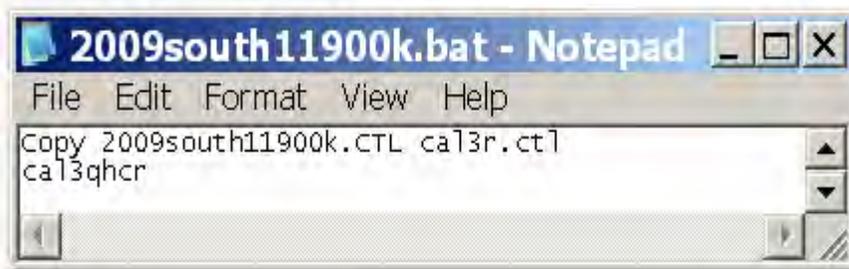
Decide on a name for the run. The name of the example scenario run is "2009south11900k".

Note that in setting up your run, you will be editing over data already present in the files.

Prepare the Batch File (.bat).

The batch file is the DOS file batch command.

Right click on the file to open it for editing. (Note that opening or double clicking on the file will cause the program to run. If this happens, simply delete the files the program creates and start again.) Once the file is open, type in the name of your run after the word “Copy”. Save the file with the name of the run. See Figure 3.14 below for the example scenario batch file.

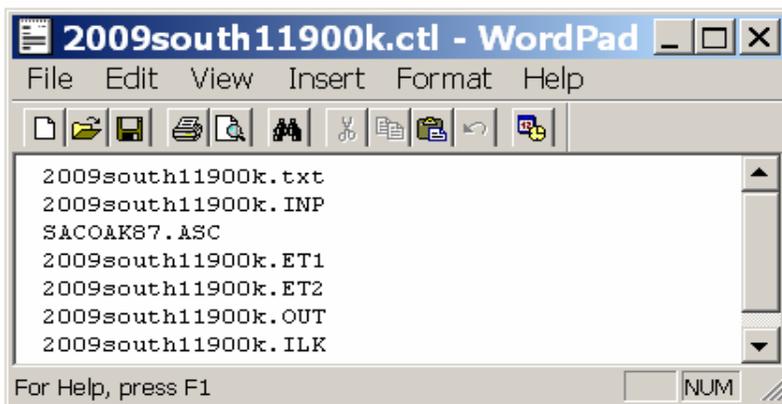


**Figure 3.14: Example Scenario Batch File**

### 3.10.1.7.2 Prepare the Control File (.ctl)

CAL3QHCR looks to the control file to find the file names that are read into the program and outputted by the program.

Type the name of your run in front of each file extension, except the .ASC file, where you will type in the meteorological data file name. Save the control file with the name of your run. See Figure 3.15 below for the example scenario control file.



**Figure 3.15: Example Scenario Control File**

### 3.10.1.7.3 Meteorological File (.asc)

The meteorological file should be in the .asc format. Contact your local air district for the recommended meteorological file. This file will not be edited.

### 3.10.1.7.4 Executable File (.exe)

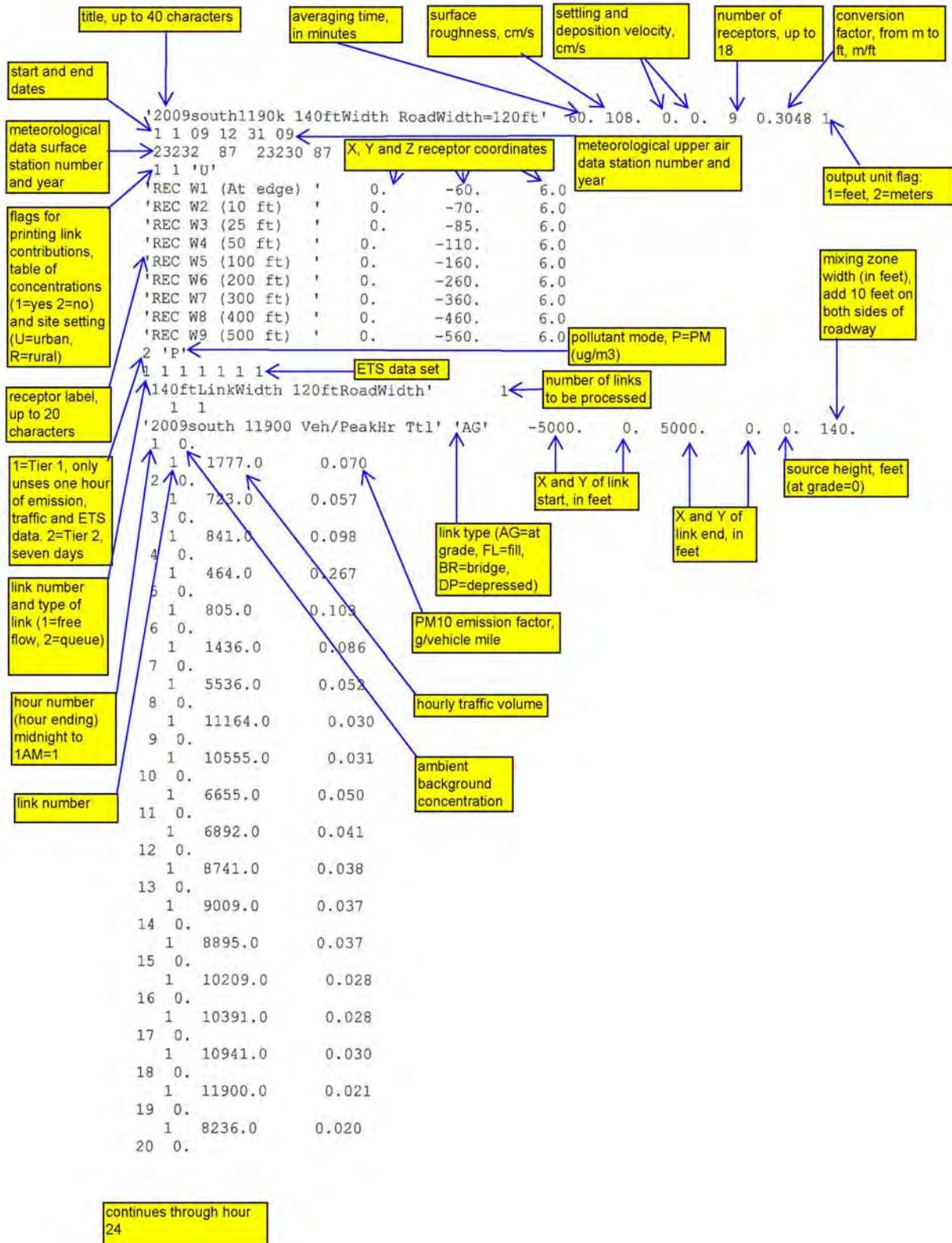
The executable file runs the program. This file will not be edited.

### **3.10.1.7.5 Prepare the Input File (.inp)**

The input file contains scenario parameters.

Prepare the input by editing over an example file provided with the model download, or by editing over a file provided by the local air district that more closely reflects the setup needed for this type of roadway modeling. Save the input file with the name of your run. See Figure 3.16 below for the example scenario input file and input explanations.

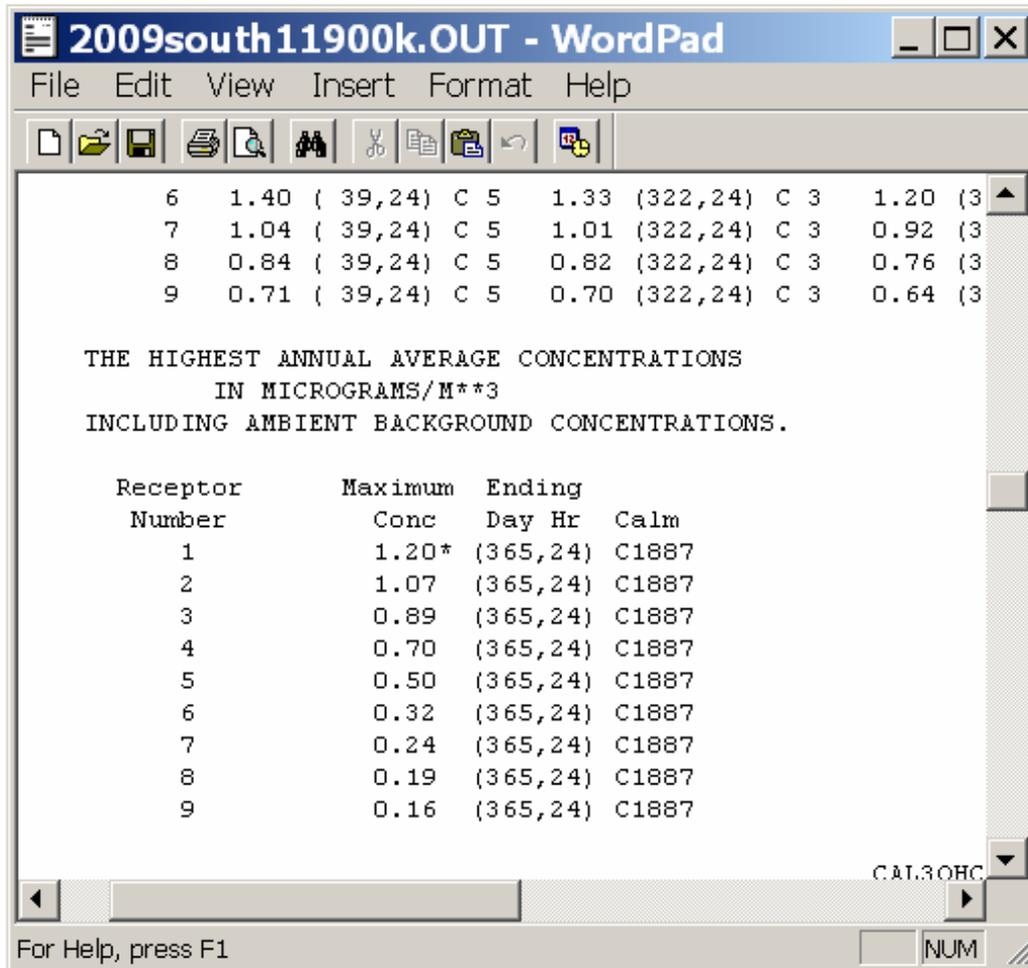
**Figure 3.16: Example Scenario Input File and Input Explanations**



### 3.10.1.8 Running the Model and Calculating Potential Cancer Risk

Double click on the .bat file to run the model. The model will produce a series of files with extensions .ET1, .ET2, .ILK, .OUT, .txt, and .ctl. Open the .txt and check to be sure the run was error-free.

The output file (.OUT) will show, among other information, the highest annual average concentrations. See Figure 3.17 below for the relevant section of the example scenario output file.



**Figure 3.17: Example Scenario Output File, Highest Annual Average Concentrations**

The example above shows downwind concentrations of diesel particulate matter at various receptor locations. The cancer risk due for diesel particulate is calculated by assuming that only the inhalation pathway applies. The default cancer risk calculation is based on the 80<sup>th</sup> percentile breathing rate, as recommended by the Office of Environmental Health Hazard Assessment. The cancer risk is calculated for receptor 4 (0.70 ug/m<sup>3</sup>) as follows:

$$\text{Cancer Risk} = S_i * C_i * \text{DBR} * A * \text{EF} * \text{ED} / \text{AT}$$

Where:

$S_i$	=	Cancer Potency Slope Factor for DPM	=	1.1 (mg/kg-d) <sup>-1</sup>
$C_i$	=	Concentration in the air of DPM	=	0.70 ug/m <sup>3</sup>
DBR	=	Daily Breathing Rate (default 80 <sup>th</sup> %ile):	=	302 L/kg-day
		(Residential Receptors)		
		(Some districts may require the use of the 95 <sup>th</sup> %ile):		
			=	393 L/kg-day
A	=	Inhalation Absorption Rate	=	1
EF	=	Exposure Frequency:	=	350 days
		(Residential Receptors)		
ED	=	Exposure Duration:	=	70 years
		(Residential Receptors)		
AT	=	Averaging Time (70 years)	=	25,550 days

Cancer Risk:

$$= (1.1 \text{ (mg/kg-d)}^{-1})(0.70 \text{ ug/m}^3)(302 \text{ L/kg-day})(1)(350 \text{ days})(70 \text{ years})/(25,550 \text{ days})$$
$$= 223 \text{ per million}$$

### 3.10.1.9 Other CAL3QHCR Features

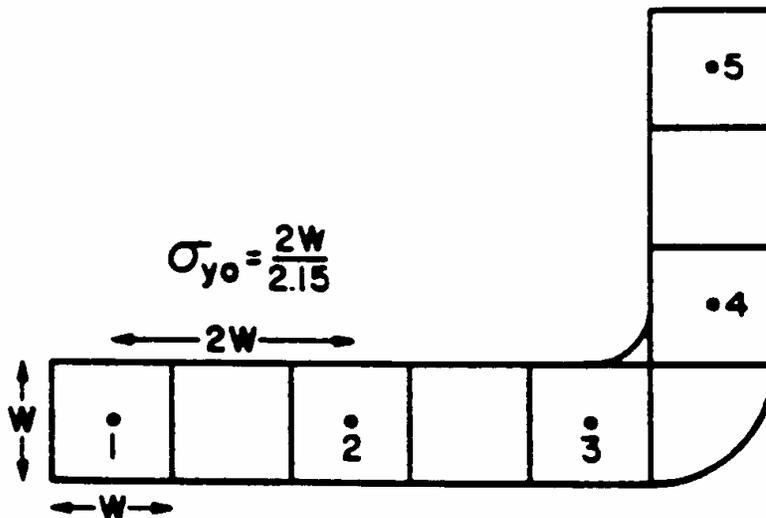
CAL3QHCR offers many other features that allow modeling traffic intersections, traffic signaling, and traffic queuing. Employing these features is quite site-specific. If these features must be employed, the user's guide should be consulted.

### 3.10.2 Modeling Roads using ISCST3 or AERMOD

CAL3QHCR is a roadway model. It can be used only to model highways. Often a project for which a health risk assessment is being prepared has additional sources. For example, a commercial development will have toxic emissions from truck idling, operation of transportation refrigeration units (TRUs), fast food restaurants, gasoline dispensing facilities, and dry cleaning operations. Large commercial operations may also have emergency diesel-fired internal combustion engines. These additional sources could be modeled in ISCST3 or AERMOD and their predicted risks superimposed upon those predicted by CAL3QHCR. Alternatively, all the sources including the roadways could be modeled using ISCST3 and AERMOD. The results of roadway modeling using ISCST3 and AERMOD are consistent with those from using CAL3QHCR. The procedures for using ISCST3 and AERMOD to model emissions from roadways are discussed below.

### 3.10.2.1 Introduction

ISCST3 and AERMOD can be used to predict the concentrations of pollutants emitted from vehicles on roads. These models have 4 basic types of sources (i.e., point, area, volume, and open pit). Emissions from idling vehicles located at a loading dock can be modeled as point sources. Area sources have been used in the past to model emissions from parking lots. The best method for modeling emissions from travelling vehicles is to use a line source or a series of multiple volume sources, as shown below.



View looking down along the length of a road segment ( $L_{RS}$ )

The following steps can be used to construct a line source that represents diesel PM emissions from diesel trucks traveling along a road segment:

1. Determine the total emissions for the diesel trucks traveling along the road segment.

$E_T$  = Emissions total for road segment

2. Using the width of the road as the length of the side ( $W$ ) of a single volume source, determine the number of volume sources along the length of the road by dividing the length of the road by  $2W$ . Round the number of volume sources either up or down.

$W$  = Width of the road

$L_{RS}$  = Length of the road segment

$N$  = Number volume sources

$N = L_{RS} / 2W$

3. Calculate the initial lateral dispersion:

$$\sigma_y = 2W / 2.15$$

3. Estimate the initial vertical dispersion using the height of the truck exhaust divided by 4.3.

$$\begin{aligned}\sigma_z &= H / 4.3 \\ &= 13 \text{ feet} / 4.3 \\ &= 3.01 \text{ feet}\end{aligned}$$

4. Calculate the emission rate for each volume source by dividing the total emissions for the road segment by the number of volume sources.

$$\begin{aligned}E_{VS} &= \text{Emission rate for each volume source} \\ E_{VS} &= E_T / N\end{aligned}$$

5. Model each individual volume source using ISCST3 or AERMOD separately, but as a group, using actual emissions for each volume source.
6. Identify the predicted concentrations at each receptor.
7. Next, calculate the risk at each receptor using the procedure outlined above in Section 3.10.1.8.

### 3.10.2.2 Data Requirements

The data that are required to model roadway emissions using ISCST3 and AERMOD are similar to those required for using CAL3QHCR. They include the following:

- **Meteorological data** – If the air district cannot provide preprocessed meteorological data, then nearby airport or monitored surface data from a meteorological station can be processed for use in ISCST3 or AERMOD. Contact your local district for availability of appropriate met data. Information on processing met data can be found in Appendix A.
- **Traffic data and vehicle emissions** – The same data as discussed above for the CAL3QCHR model are used.
- **Roadway configuration** – The width of the roadway is used as the length of a side for each volume source. Receptors should be located the same as with the CAL3QCHR model.
- **Terrain data** – For ISCST3, elevation data must be entered manually. AERMAP is used to generate the elevations and hill slopes for receptors and sources for input to the AERMOD model. Digital Elevation Model (DEM) files for use in AERMAP are available from a variety of sources.

Third-party software used to prepare the input file for ISCST3, and used to allow the model results to be viewed graphically, can also be used to determine terrain elevations using DEM files.

Once these data are assembled, the model input file can be created.

### 3.10.2.3 Preparing the Model Input File

The input files for ISCST3 and AERMOD are very similar. In the discussion below, only the input file for the ISCST3 model will be described.

The input file must contain the following components or sections:

- CO – for overall job control options
- SO – for source information
- RE – for receptor information
- ME – for meteorological data
- TG – for a terrain grid (optional)
- OU – for output options

Each of these sections is discussed briefly below. For more detailed information, the *User's Guide for the Industrial Source Complex (ISC3) Dispersion Models: Volume I – User Instructions* (EPA-454/B-95-003a) should be consulted.

#### 3.10.2.3.1 Control Option Section

Each section begins with a STARTING command and ends with a FINISHED command. Model options that must be specified include: a title; model options such as default or “regulatory” dispersion options, rural or urban dispersion coefficients, and concentration or deposition estimates; the averaging time (period or annual for carcinogenic risk); the pollutant identification; and the RUNORNOT option. The following is a sample input for the example discussed above:

```
CO STARTING
  TITLEONE 2009south1190k
  MODELOPT DFAULT CONC URBAN
  AVERTIME PERIOD
  POLLUTID DPM
  TERRHGTS ELEV
  FLAGPOLE 1.80
  RUNORNOT RUN
  ERRORFIL Road.err
CO FINISHED
```

In this sample input file, the regulatory default options are used. The model will calculate concentrations of DPM (i.e., diesel particulate matter) using urban dispersion coefficients. The receptors will all be modeled with a default height of 6 ft or 1.8 m. The model will run to completion and will output an error file.

### 3.10.2.3.2 Source Section

As discussed above, a series of volume sources will be modeled to simulate the roadway. The sample input file for this section is the following:

```
SO STARTING
** Source Location **
** Source ID - Type - X Coord. - Y Coord. **
** Line Source represented by Separated Volume Sources
** -----
** LINE Source ID = SLINE1
** DESCRSRC 2009south1190k
** Length of Side = 36.58
** Emission Rate = 0.123435368
** Elevated
** Vertical Dimension = 0.85
** SZINIT = 0.20
** Nodes = 2
** 309476.00, 3916500.00, 0.00, 3.66, 0.0
** 312527.00, 3916500.00, 0.00, 3.66, 33.38
** -----
LOCATION L0000001 VOLUME 309494.288 3916500.000 0.00
LOCATION L0000002 VOLUME 309566.060 3916500.000 0.00
LOCATION L0000042 VOLUME 312436.939 3916500.000 0.00
LOCATION L0000043 VOLUME 312508.711 3916500.000 0.00
** End of Line Source
** Source Parameters **
SRCPARAM L0000001 0.00287058995348837 3.66 33.38 0.85
SRCPARAM L0000002 0.00287058995348837 3.66 33.38 0.85
SRCPARAM L0000042 0.00287058995348837 3.66 33.38 0.85
SRCPARAM L0000043 0.00287058995348837 3.66 33.38 0.85
** Variable Emissions Type: "By Hour-of-Day"
** Variable Emission Scenario: "Scenario 1"
EMISFACT L0000001 HROFDY 0.53 0.176 0.351 0.528 0.353 0.526
EMISFACT L0000001 HROFDY 1.227 1.427 1.395 1.418 1.204 1.416
SRCGROUP SRCGP1 L0000001 L0000002 L0000003 L0000004 L0000005 L0000006
SRCGROUP SRCGP1 L0000043
SO FINISHED
```

In the above sample input, all lines with “\*\*” are comments. This file was generated using an interface program for the model. In this interface, the information for the line source is input, and the program automatically generates the individual volume sources. As can be seen from the input file, there are 43 separate volume sources in this “line source”. The location of the center of each volume source and its base elevation (i.e., 0 m) is given on the LOCATION command. The SRCPARAM commands specify the emission rate, the release height, the initial lateral dimension, and the initial vertical dimension. The average emission rate calculated from the information provided above was used. The program divides the emission rate for the line source by the number of volume sources.

A **release height** of 12 ft or 3.66 m was used to approximate the height of the plume from a heavy-duty diesel truck.

The width of the roadway was used as the **length of the side for each volume source**.

The length of the side is used to calculate an initial lateral dimension. For this example, the **initial lateral dimension** is 34.03 m or  $2 \times 36.58/2.15$ . (The initial lateral dimension actually used is 33.38 m to ensure that there are an equal number of volume sources in the length of road. This small difference in the calculated initial lateral dimension and the one actually used would not significantly affect the concentrations estimated.)

Based on this release height, an **initial vertical dimension** of 0.85 m or  $3.66/4.3$  was used.

Variable emission factors (EMISFACT) by the hour of the day (HROFDAY) were used to adjust the average emission rate by the appropriate factor based upon the discussion above for the CAL3QCHR run.

### 3.10.2.3.3 Receptor Section

Receptors were located at the distances specified above in the discussion of CAL3QCHR modeling. The sample input file for this section is the following:

```
RE STARTING
** DESCRREC "FENCEGRD" "Receptors generated from Fenceline Grid"
DISCCART 312530.00 3916454.00 0.00 1.80
DISCCART 312505.15 3916454.00 0.00 1.80
** DESCRREC "FENCEPRI" "Cartesian plant boundary Primary Receptors"
DISCCART 309473.00 3916457.00 0.00 1.80
DISCCART 312530.00 3916457.00 0.00 1.80
DISCCART 312530.00 3916543.00 0.00 1.80
DISCCART 309473.00 3916543.00 0.00 1.80
** DESCRREC "FENCEINT" "Cartesian plant boundary Intermediate Receptors"
DISCCART 309497.85 3916457.00 0.00 1.80
DISCCART 309522.71 3916457.00 0.00 1.80
DISCCART 309473.00 3916478.50 0.00 1.80
RE FINISHED
```

The interface program used allows the automatic creation of a telescopic fenceline grid around a facility. This feature was used to create the receptors in this sample input.

First, primary plant boundary receptors were located around the highway. The “plant boundary” was assumed to be the edge of the roadway (i.e., 10 ft on each side of the road from the roadway’s width).

Intermediate receptors were located at a distance of 25 m between receptors along the edge of the roadway.

Then, tiers of receptors at distances of 10 ft, 25 ft, 50 ft, 100 ft, 200 ft, 300 ft, 400 ft, and 500 ft from the roadway edge were entered.

These grid receptors were converted to discrete receptors, and any extraneous receptors were removed.

Note that specific receptors for residences or other **sensitive receptors** could be modeled directly with the ISCST3/AERMOD model.

The **elevation of receptors** was assumed to be zero.

A **receptor height** of 6 ft or 1.8 m was used to approximate the breathing height.

### **3.10.2.3.4 Meteorology Section**

The meteorology section specifies the meteorological data to be used. The sample input file for this section is the following:

```
ME STARTING
  INPUTFIL C:\MODELI~1\SACOAK85.asc
  ANEMHGHT 10 METERS
  SURFDATA 23232 1985 SACRAMENTO/EXECUTIVE_ARPT
  UAIRDATA 23230 1985 OAKLAND/WSO_AP
ME FINISHED
```

For this sample input file, the 1985 meteorological data from Sacramento was downloaded from the District's website. In the input file, the name and location of the met data file is specified. The height of the anemometer is given. (Most anemometers at airport weather stations are 10 m high.) And, the station number, year and name of the surface data and upper air stations are identified.

### **3.10.2.3.4 Output Section**

The output section specifies the files or reports to be output. The sample input file for this section is the following:

```
OU STARTING
** Auto-Generated Plotfiles
  PLOTFILE PERIOD SRCGP1 ROAD.IS\PE00G001.PLT
OU FINISHED
```

ISCST3/AERMOD have a variety of files and reports that can be output. One of the most useful filetypes that can be output is the plotfile. A plotfile has the following information:

```

* ISCST3 (02035): 2009south1190k
* MODELING OPTIONS USED:
*   CONC          URBAN ELEV  FLGPOL  DFAULT
*   PLOT FILE OF PERIOD VALUES FOR SOURCE GROUP: SRCGP1
*   FOR A TOTAL OF 2236 RECEPTORS.
*   FORMAT: (3(1X,F13.5),1X,F8.2,2X,A6,2X,A8,2X,I8.8,2X,A8)
*   X            Y            AVERAGE CONC  ZELEV      AVE      GRP      NUM HRS  NET ID
*   -----
312530.00000 3916454.00000      0.13119      0.00  PERIOD  SRCGP1      00008760      NA

```

For each receptor and each specified source group, this file contains the highest predicted concentration for the specified averaging time. Multiple files can be created for multiple source groups (which can be single sources or multiple sources depending upon those specified by the user) and for each averaging time modeled. These plotfiles can be used to generate a \*.XOQ file for input into the Hot Spots Analysis and Reporting Program (HARP). They also can be used by graphics programs incorporated into the model interface programs or software such as SURFER to generate isopleths of concentration for a visual display of the results.

### 3.10.2.4 Analyzing Model Results

Concentrations predicted by ISCST3/AERMOD can be used to estimate risk using the procedure discussed above for cancer risk from emissions of diesel particulate matter. The plotfiles generated by the models can be used to create an input file for HARP. Importing the results into HARP can be useful if there are other sources that may contribute to the total risk (e.g., in the case of a commercial development). All sources can be modeled in ISCST3/AERMOD while only the roadway sources can be modeled in CAL3QCHR.

## Chapter 4. Geographical Information Inputs

### 4.1 Comparison of Screening and Refined Model Requirements

Geographical information requirements range from basic for screening analyses to advanced for refined modeling. SCREEN3 makes use of geographical information only for terrain data for complex or elevated terrain where it requires simply distance from source and height in a straight-line. The AERMOD and ISCST3/ISC-PRIME models make use of complete three-dimensional geographic data with support for digital elevation model files and real-world spatial characterization of all model objects.

### 4.2 Coordinate System

#### 4.2.1 Local

Local coordinates encompass coordinate systems that are not based on a geographic standard. For example, a facility may reference its coordinate system based on a local set datum, such as a predefined benchmark. All site measurements can relate to this benchmark which can be defined as the origin of the local coordinate system with coordinates of 0.0 m. All facility buildings and sources could then be related spatially to this origin.

However, local coordinates do not indicate where in the actual world the site is located. For this reason, it is advantageous to consider a geographic coordinate system that can specify the location of any object anywhere in the world with precision. The coordinate system most commonly used for air dispersion modeling is the Universal Transverse Mercator system.

## **4.2.2 UTM**

As described earlier, the Universal Transverse Mercator (UTM) coordinate system uses meters as its basic unit of measurement and allows for more precise definition of specific locations than latitude/longitude. Google Earth may be used to determine the UTM or latitude/longitude coordinates.

Ensure all model objects (sources, buildings, receptors) are defined in the same horizontal datum. Defining some objects based on a NAD27 (North American datum of 1927) while defining others within a NAD83 (North American datum of 1983) can lead to significant errors in relative locations.

## **4.3 Terrain**

### **4.3.1 Terrain Concerns in Short-Range Modeling**

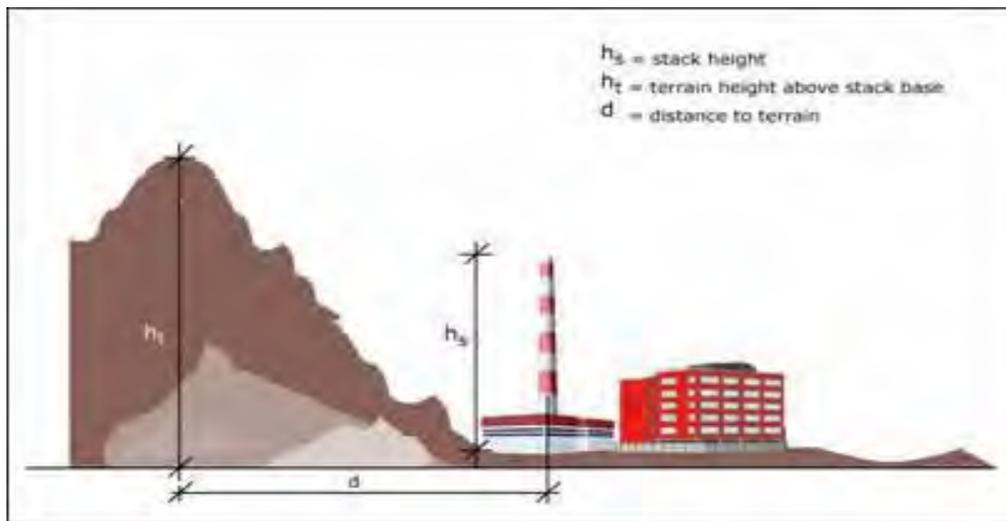
Terrain elevations can have a large impact on the air dispersion and deposition modeling results and therefore on the estimates of potential risk to human health and the environment. Terrain elevation is the elevation relative to the facility base elevation.

The following section describes the primary types of terrain. The consideration of a terrain type is dependant on your study area, and the definitions below should be considered when determining the characteristics of the terrain for your modeling analysis.

### **4.3.2 Flat and Complex Terrain**

The models consider three different categories of terrain as follows:

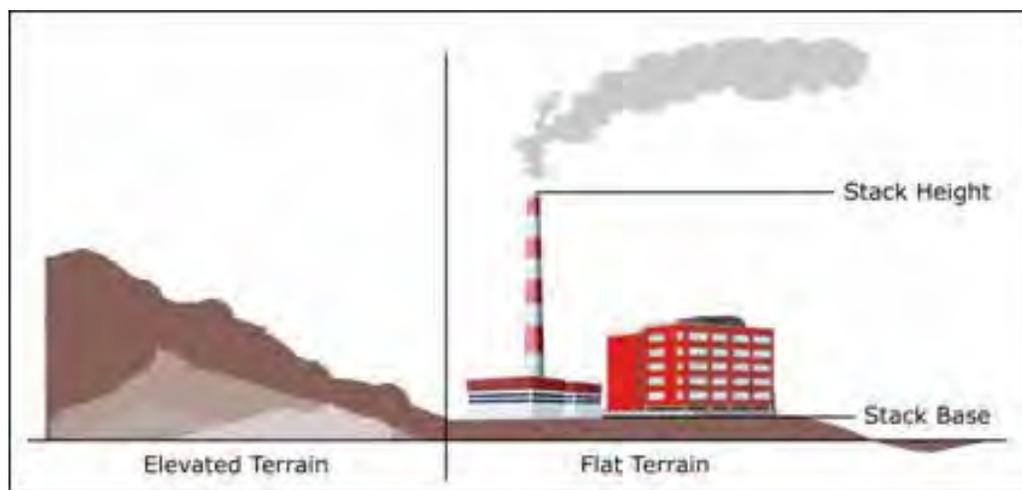
Complex Terrain: as illustrated in Figure 4.1, where terrain elevations for the surrounding area, defined as anywhere within 50 km from the stack, are above the top of the stack being evaluated in the air modeling analysis.



**Figure 4.1 - Complex terrain conditions.**

Simple Terrain: where terrain elevations for the surrounding area are not above the top of the stack being evaluated in the air modeling analysis. The “Simple” terrain can be divided into two categories:

- Simple Flat Terrain is used where terrain elevations are assumed not to exceed stack base elevation. If this option is used, then terrain height is considered to be 0.0 m.
- Simple Elevated Terrain, as illustrated in Figure 4.2 is used where terrain elevations exceed stack base but are below stack height.



**Figure 4.2 –Elevated and flat terrain conditions.**

### 4.3.3 Criteria for Use of Terrain Data

Evaluation of the terrain within a given study area is the responsibility of the modeler. Complex terrain may need to be considered even in areas that appear to be relatively flat. It should be remembered that complex terrain is any terrain within the study area that is above the source release height.

The appropriate terrain environment can be determined through the use of digital elevation data or other geographic data sources. It should be noted that the refined models, ISCST3/ISC-PRIME and AERMOD, have similar run times regardless of whether or not terrain data is used. However AERMAP, the terrain pre-processor for AERMOD, does require additional time. If analysis of the terrain environment is performed using digital terrain data, minimal resources are required to execute a model run using that digital terrain dataset.

#### **4.3.4 Obtaining Terrain Data**

Terrain data that are input into the AERMOD and ISCST3/ISC-PRIME models should be provided in electronic form. Digital elevation terrain data is available from a variety of vendors in several different formats.

Digital elevation model (DEM) data are available for free from Lakes Environmental's Web GIS web page <http://www.webgis.com>.

#### **4.3.5 Preparing Terrain Data for Model Use**

It is strongly suggested that the 7.5-minute data be used in dispersion modeling rather than the coarse resolution 1 degree data. Keep in mind that the USGS DEMs can be in one of two horizontal datums. Older DEMs were commonly in NAD27 (North American Datum of 1927) while many of the latest versions are in NAD83 (North American Datum of 1983).

##### **4.3.5.1 ISC / HARP**

The ISCST3 model accepts elevation data for receptors and sources. This data should be obtained from the USGS topographic maps or Digital Elevation Model (DEM) files. USGS DEMs are available for California from ARB at (<http://www.arb.ca.gov/toxics/harp/maps.htm>) in 7.5-minute format for use in the ARB HARP program and from Lakes Environmental at <http://www.webgis.com> in 7.5 minute and 1 degree formats.

##### **4.3.5.2 AERMOD**

AERMAP is the digital terrain pre-processor for the AERMOD model. It analyzes and prepares digital terrain data for use within an air dispersion modeling project. AERMAP requires that the digital terrain data files be in native (non SDTS) USGS 1-degree or 7.5-minute DEM format.

### **4.4 Defining Urban and Rural Conditions**

The classification of a site as urban or rural can be based on the Auer method specified in the EPA document *Guideline on Air Quality Models (40 CFR Part 51, Appendix W)*<sup>37</sup>. From the Auer's method, areas typically defined as Rural include:

---

<sup>37</sup> U.S. Environmental Protection Agency, 2001. Appendix W to Part 51 Guideline on Air Quality Models, 40 CFR Part 51. U. S. Environmental Protection Agency, Research Triangle Park, NC.

- Residences with grass lawns and trees
- Large estates
- Metropolitan parks and golf courses
- Agricultural areas
- Undeveloped land
- Water surfaces

Auer suggests that an area can be classified as Urban if it has less than 35% vegetation coverage or the area falls into one of the following use types:

**Table 4.1 - Urban Land use**

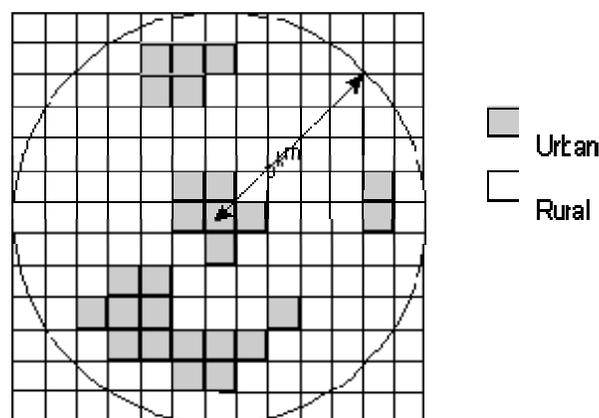
Type	Use and Structures	Vegetation
I1	Heavy industrial	Less than 5%
I2	Light/moderate industrial	Less than 5%
C1	Commercial	Less than 15%
R2	Dense single / multi-family	Less than 30%
R3	Multi-family, two-story	Less than 35%

Follow the Auer's method, explained below, for the selection of either urban or rural dispersion coefficients:

**Step 1:** Draw a circle with a radius of 3 km from the center of the stack or centroid of the polygon formed by the facility stacks.

**Step 2:** If land use types I1, I2, C1, R2, and R3 account for 50% or more of the area within the circle, then the area is classified as Urban, otherwise the area is classified as Rural.

To verify if the area within the 3 km radius is predominantly rural or urban, overlay a grid on top of the circle and identify each square as primarily urban or rural. If more than 50% of the total number of squares is urban than the area is classified as urban; otherwise the area is rural.<sup>35</sup>



An alternative approach to Urban/Rural classification is the Population Density Procedure: Compute the average population density,  $p$ , per square kilometer.

- If  $p > 750$  people/km<sup>2</sup>, select the Urban option,
- If  $p \leq 750$  people/km<sup>2</sup>, select the Rural option.

Of the two methods above, the land use procedure is considered a more definitive criterion. The population density procedure should be used with caution and should not be applied to highly industrialized areas where the population density may be low and thus a rural classification would be indicated, but the area is sufficiently built-up so that the urban land use criteria would be satisfied. In this case, the classification should already be Urban and urban dispersion parameters should be used.

Prior to using either of the above methods, contact the district to determine whether the area in question has already been designated as urban or rural.

## **Chapter 5. Meteorological Data**

### **5.0 Comparison of Screening and Refined Model Requirements**

Meteorological data is essential for air dispersion model modeling as it describes the primary environment through which the pollutants being studied migrate. Similar to other data requirements, screening model requirements are less demanding than refined models.

SCREEN3 provides 3 methods of defining meteorological conditions:

- Full Meteorology: SCREEN will examine all six stability classes (five for urban sources) and their associated wind speeds. SCREEN examines a range of stability classes and wind speeds to identify the "worst case" meteorological conditions, i.e., the combination of wind speed and stability that results in the maximum ground level concentrations.
- Single Stability Class: The modeler can select the stability class to be used (A through F). SCREEN will then examine a range of wind speeds for that stability class only.
- Single Stability Class and Wind Speed: The modeler can select the stability class and input the 10-meter wind speed to be used. SCREEN will examine only that particular stability class and wind speed.

Contact the district for guidance if full meteorology is not being used in SCREEN.

See Appendix A for information on preparing meteorological data for refined modeling (AERMOD and ISC).

## **Chapter 6. Receptor Locations**

### **6.0 Receptors**

A receptor is defined as a point where an actual person (residential or worker) may be located for a given period of time. The period of time is based on the type of assessment that is being performed. When an acute (1-hour or longer, as applicable) risk assessment is to be prepared, all locations where a person could be located for a one hour period needs to be identified. When a cancer or chronic risk assessment is to be prepared, all locations where a person could be located for extended periods of time, such as a residence or workplace, need to be identified.

#### **6.0.1 Residential Receptors**

Homes, apartments, motels, trailer parks, residential camp grounds, and other places where people reside for long periods are defined as residential receptors. When a cancer risk is prepared, the exposure period should be 70 years. For acute risk assessments, the exposure period should be 1 hour for those substances with acute toxicity values based on one hour exposure periods.

#### **6.0.2 Worker Receptors**

Worksites, schools, and other locations where people are exposed for long periods of time are defined as worker receptors. When a cancer risk is prepared, the exposure period should be 40 years. For acute risk assessments, the exposure period should be 1 hour for those substances with acute toxicity values based on one hour exposure periods.

#### **6.0.3 Offsite Receptors**

Offsite receptors are included in risk assessments when they are not employed by the project.

#### **6.0.4 Onsite Receptors**

Onsite receptors are included in risk assessments if they are persons not employed by the project.

#### **6.0.5 Sensitive Receptors**

Sensitive receptors are defined as the following:

- Schools
- Daycare facilities other than home based
- Hospitals
- Care facilities (adult/elderly)

At the present time, the risk assessment calculations do not calculate different risk values for sensitive receptors compared to other receptors. However, sensitive receptors must be identified. Contact the district to determine the area in which sensitive receptors must be identified. Some

commonly used criteria are out to a distance of 2 kilometers from a project emission source or within the 1 in a million risk isopleth.

## 6.1 Receptor Grids

### 6.1.1 Cartesian Receptor Grids

Cartesian receptor grids are receptor networks that are defined by an origin with receptor points evenly (uniform) or unevenly (non-uniform) spaced around the origin. Figure 6.1 illustrates a sample uniform Cartesian receptor grid.

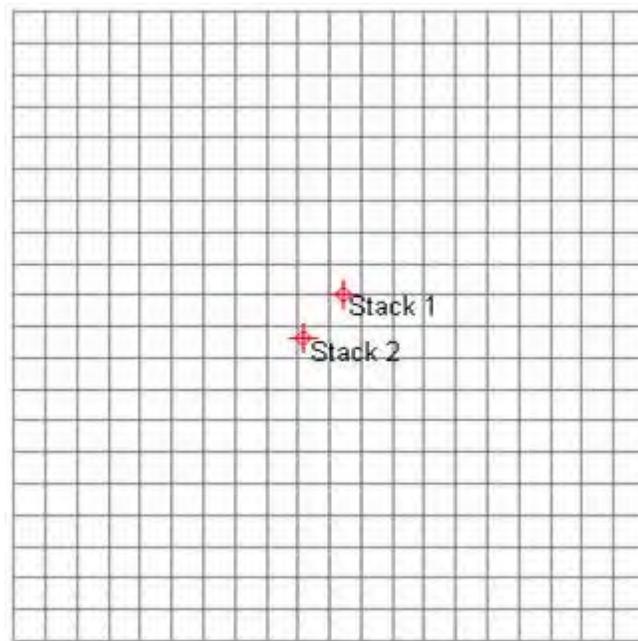


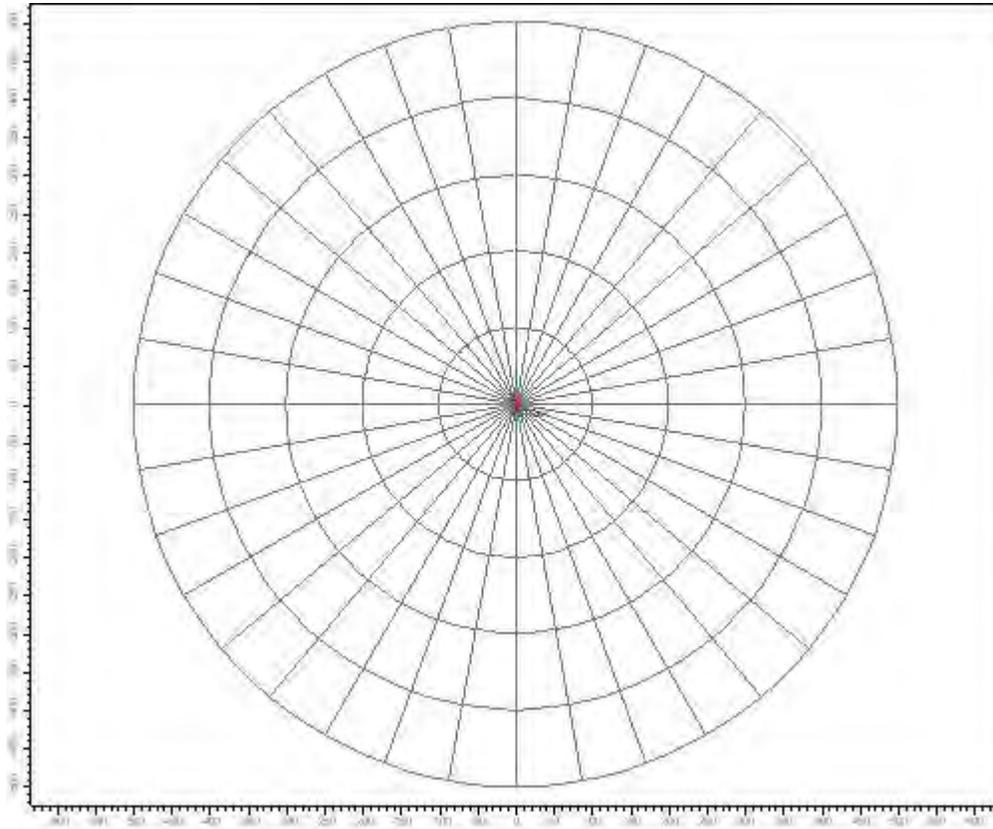
Figure 6.1 – Example of a Cartesian grid.

Tall stacks could require grids extending 1 to 3 km, while the grid for shorter stacks (10 to 20 m above ground) might only need to be extended a km or less from the property line.

### 6.1.2 Polar Receptor Grids

Polar receptor grids are receptor networks that are characterized by an origin with receptor points defined by the intersection of concentric rings, which have defined distances in meters from the origin, with direction radials that are separated by specified degree spacing. Figure 6.2 illustrates a sample uniform polar receptor grid.

Polar grids are a reasonable choice for facilities with only one source or one dominant source. However, for facilities with a number of significant emissions sources, receptor spacing can become too coarse when using polar grids. As a result, polar grids should generally be used in conjunction with another receptor grid, such as a multi-tier grid, to ensure adequate spacing.



**Figure 6.2 – Example of a polar grid.**

### **6.1.3 Multi-Tier Grids**

Each receptor point requires computational time. Consequently, it is not optimal to specify a dense network of receptors over a large modeling area; the computational time would negatively impact productivity and available time for proper analysis of results. An approach that combines aspects of coarse grids and refined grids in one modeling run is the multi-tier grid.

The multi-tier grid approach strives to achieve proper definition of points of maximum impact while maintaining reasonable computation times without sacrificing sufficient resolution. Figure 6.3 provides an example of a multi-tier grid.

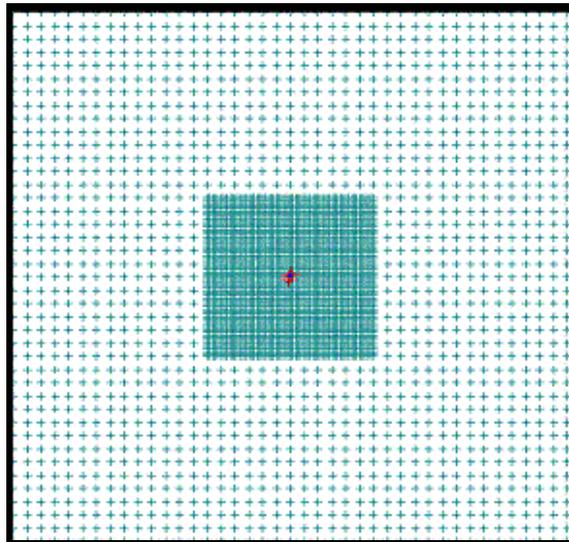


Figure 6.3 - Sample Multi-Tier Grid with 2 tiers of spacing.

### 6.1.4 Fence line Receptors

Unless on-site receptors are present, it is not necessary to model the locations within a property boundary. If on-site receptors may be present, contact the District concerning receptor placement. If a fence line receptor point does not represent an existing or reasonably anticipated person, it is not necessary to consider these results to determine the Maximum Exposed Individual (MEI), but fence line exposure should be considered to determine the Point of Maximum Impact (PMI).

A receptor network based on the shape of the property boundary that has receptors parallel to the boundaries is often a good choice for receptor geometry. The receptor spacing can then progress from fine to coarse spacing as distance increases from the facility, similar to the multi-tier grid.

### 6.1.5 Discrete & Sensitive Receptors

Receptor grids do not always cover precise locations that may be of interest in modeling projects. Specific locations of concern can be modeled by placing single receptors, or additional refined receptor grids, at desired locations. This enables the modeler to generate data on specific points for which data is especially critical. Examples of specific locations can include:

- Apartments,
- Residential zones,
- Schools,
- Apartment buildings,
- Day care centers,
- Air intakes on nearby buildings,
- Hospitals,
- Parks,
- Care Facilities, or

- Elevated receptors, such as balconies or air intakes on multilevel buildings, as concentrations of toxic substances can be higher there than at ground level.

Depending on the project resolution and location type, these can be characterized by discrete receptors, a series of discrete receptors, or an additional receptor grid.

## **6.2 Variable Receptor Spacing to include the Point of Maximum Impact (PMI)**

The receptor grid must be designed to include the Point of Maximum Impact (PMI). For facilities with more than one emission source, the receptor network should include Cartesian or multi-tier grids to ensure that maximum concentrations are obtained. An indication as to the PMI can be determined by using SCREEN3 or AERSCREEN applied to the most significant sources at a facility.

The model could be first run with a coarser grid, and then run with finer grids in the areas showing the highest impacts. If this method is used, finer grids, as described above, should be used for all areas with high concentrations, not just the single highest area.

The densities of the receptors can progress from fine resolution near the source, centroid of the sources, or most significant source (not from the property line for polar grid) to coarser resolution farther away. Section 6.1.3 shows an example of multiple grid spacing to ensure that the maximum ground level offsite property concentrations are captured.

Receptors should also be placed along the property boundaries. The spacing of these receptors depends on the distance from the emission sources to the facility boundaries. For cases with emissions from short stacks or vents and a close property line, a receptor spacing of 25 m might be required. For taller stacks and greater distances to the property boundary, a receptor spacing greater than 25 m might be appropriate.

It is the responsibility of the modeler to demonstrate that the PMI has been identified and that the modeling includes all areas where Hazard Indices are above one, and the cancer risk is above ten per million, or other district standards.

### **6.2.1 Example Polar Grid Spacing**

- 36 Directional Radials
- Radial Distances:
  - 25 m
  - 50 m
  - 100 m
  - 250 m
  - 500 m

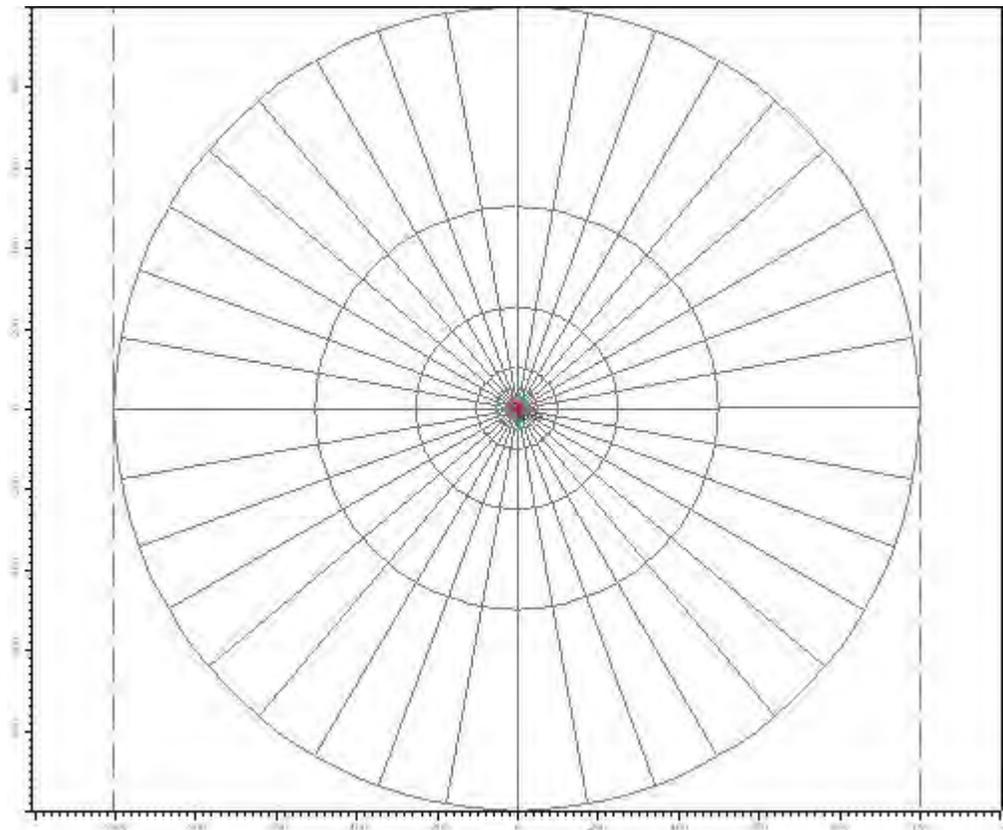


Figure 6.4 – Sample Polar Grid receptor grid layout.

## Chapter 7. Other Modeling Considerations

### 7.0 Alternative Model Use

Due to some limitations inherent in AERMOD (and most other plume models), there are some situations where the use of an alternative model may be appropriate. Acceptable Alternative Models and their use are further described on EPA's [Support Center for Regulatory Atmospheric Modeling \(SCRAM\)](#) web page.

AERMOD is a steady-state plume model. For the purpose of calculating concentrations, the plume is assumed to travel in a straight line without significant changes in stability as the plume travels from the source to a receptor. At distances on the order of tens of kilometers downwind, changes in stability and wind are likely to cause the accuracy to deteriorate. For this reason, AERMOD should not be used for modeling at receptors beyond 50 kilometers. AERMOD may also be inappropriate for some near-field modeling in cases where the wind field is very complex due to terrain or a nearby shoreline.

AERMOD does not treat the effects of shoreline fumigation. Shoreline fumigation may occur along the shore of the ocean or large lake. When the land is warmer than the water, a sea breeze will form as the warmer lighter air inland rises. As the stable air from over the water moves inland, it is heated from below, resulting in a turbulent boundary layer of air that rises with downwind distance from the shoreline. The plume from a stack source located at the shoreline may intersect

the turbulent layer and be rapidly mixed to the ground, a process called “fumigation,” resulting in high concentrations. In these and other situations, the use of alternative models may be desired.

The use of any alternative model should first be reviewed by the district for suitability to the study application. If an alternative model is used the reasons and argument for its use over a preferred model must be discussed. An understanding of the alternative model, its data requirements, and the quality of data applied with the model must be demonstrated.

## **7.1 Use of Modelled Results in Combination with Monitoring Data**

Monitoring and modeling should be considered complementary tools to assess potential impacts on the local community.

Monitoring data could be used to provide verification of model results if sufficient monitoring data is available at locations impacted by facility emissions. Decisions on the adequacy of the monitoring data would be made on a case-by-case basis. Comparisons between measured and modeled results would depend on the amount of monitored data available. Advance consultation with the district is advisable if a comparison of model results with monitoring data is undertaken.

If model results do not agree with measured data, the facility source characteristics and emission data should be reviewed.

For cases where reliable information is available on the emission rates and source characteristics for a facility, modeled results can identify maximum impact areas and concentration patterns that could assist in siting monitors. Model runs using a number of years of meteorological data would show the variations in the locations and the magnitude of maximum concentrations and can also provide information on the frequency of high concentrations.

The U.S. EPA Guideline on Air Quality Models states that modeling is the preferred method for determining concentrations and that monitoring alone would normally not be accepted for determining emission limitations.

When monitoring data are used to verify modeling results for averaging times from 1 to 24 hours, more robust comparisons would be achieved using a percentile of the data rather than only the maximum concentrations. Percentile comparisons reduce the impacts of outliers in either the monitoring or the model results. For some contaminants, the impact of background sources on measured concentrations might need to be taken into consideration.

## **7.2 Information for Inclusion in a Modeling Assessment**

A suggested checklist of parameters designed to provide an overview of all information that should be submitted for a refined air dispersion modeling assessment is outlined in Appendix B.

The checklist should not be considered exhaustive for all modeling studies; it provides the essential requirements for a general assessment. All sites can have site-specific scenarios that may call for additional information and result in a need for different materials and data to be submitted.

It is the responsibility of the submitter to ensure proper completion and analysis of any air dispersion modeling assessment delivered for review.

### **7.3 Level of Detail of Health Risk Assessments**

Generally, a health risk assessment for CEQA purposes must include all sources of emissions that will emanate from a project. This includes existing and proposed facility-wide emissions. This includes all sources of potential emissions whether or not the project is subject to district permitting requirements. Additionally, all substances that the Office of Environmental Health Hazard Assessment has identified as having toxicity values must be included in the health risk assessment; some districts may allow a less detailed risk assessment.

It is not permissible to omit permitted sources in a CEQA risk assessment, even if these sources will be evaluated during the permit process. The permitting process does not evaluate the cumulative risk associated with the entire facility, only the individual permit unit. A challenge to the completeness of the risk assessments can be made if these sources are not included in the analysis.

It is also not permissible to omit criteria pollutants in the facility risk assessment, assuming that these emissions will be evaluated separately. Criteria pollutants have OEHHA approved RELs that must be included in the chronic and acute hazard indices. Again, a challenge to the completeness of the risk assessments can be made if these substances are omitted.

## **Chapter 8. Exposure Assessment Procedures**

### **8.0 Cancer Risk Assessment Procedure for Inhalation Only Pathway Pollutants**

The following procedure may be used to assess the health risks from facilities for which diesel particulate matter is emitted or other substances identified as only entering the body through the inhalation pathway. Risk Assessments involving substances that enter the body through other pathways must be analyzed for each pathway. A risk assessment involving multipathway substances can be prepared using the HARP program available through the California Air Resources Board.

Cancer Risk Procedure for Inhalation only Substances:

- Model emissions to determine both the:
  - annual average ground-level concentrations, and the
  - one hour maximum concentration (or other period depending on the acutely toxic substance)
- Create a plot file for these ground-level concentrations.
- Open the plot file using Microsoft EXCEL or another spreadsheet program.
- Copy the data from the plot(s) into Excel.
- To determine the cancer risk, apply the following formula to each ground-level concentrations:

$$\text{Cancer Risk} = S_i * C_i * \text{DBR} * A * \text{EF} * \text{ED} * 10^{-6} / \text{AT}$$

Where:

$S_i$  = Slope Factor for substance i  
 $C_i$  = Concentration in the air of substance i  
 DBR = Daily Breathing Rate:

Residential Receptors = 302 L/kg-day (default 80<sup>th</sup> %ile)  
 = 393 L/kg-day (95<sup>th</sup> %ile)

Worker Receptors = 149 L/kg-day

A = Inhalation Absorption Rate = 1

EF = Exposure Frequency:

Residential Receptors = 350 days

Worker Receptors = 245 days

ED = Exposure Duration:

See Section 1.3

AT = Averaging Time = 25,550 days

The result will be cancer risk for each source and receptor combination modeled.

For worker exposures, in addition to adjusting the breathing rate, exposure frequency, and exposure duration for workers versus residents, the emission rate must be adjusted to ensure that the worker risk is based upon the pollutant concentrations to which the worker is exposed. For additional information, see Section 8.2.2b of OEHHA's [Air Toxics Hot Spots Program Risk Assessment Guidelines: The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments](#), August 2003.

## 8.1 Cancer Risk Assessment Procedure for Multi-Pathway Pollutants

The procedure for preparing a multi-pathway risk assessment can be complex. The HARP User Guide and the OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines contains a detailed discussion of how to prepare multi-pathway risk assessments. These documents and others can be found on the CARB website at <http://www.arb.ca.gov/toxics/harp/docs.htm>.

## 8.2 Chronic Noncancer Health Impacts

The procedure for determining the impact of chronically toxic substances is described in detail in the OEHHA state guidelines<sup>38</sup>. Noncancer chronic inhalation impacts are calculated by dividing the annual average concentration by the REL (Reference Exposure Level) for that substance. The REL is defined as the concentration at which no adverse noncancer health effects are anticipated. For a single substance, this result of this calculation is called the Hazard Quotient. The following equation is used to calculate the Hazard Quotient:

$$\text{Hazard Quotient} = C_i/\text{REL}_i$$

Where:

$C_i$  = Concentration in the air of substance  $i$

$\text{REL}_i$  = Chronic noncancer Reference Exposure Level for substance  $i$

For multiple substances, the Hazard Index (HI) is calculated. The HI is calculated by summing the HQs from all substances that affect the same organ system. HQs for different organ systems are not added, for example, do not sum respiratory irritation HQs with cardiovascular effects. The following equation is used to calculate the Hazard Index for the eye irritation endpoint:

$$\text{Hazard Index (HI}_{\text{eye}}) = \text{HQ}_{\text{substance 1(eye)}} + \text{HQ}_{\text{substance 2(eye)}}$$

No exposure duration adjustment (e.g., 9/70) should be made for noncancer assessments.

For a chronic noncancer assessment involving multipathway pollutants, the California Air Resources Board HARP model can be used.

## 8.3 Acute Noncancer Health Impacts

The procedure for determining the impact of acutely toxic substances is also described in detail in the OEHHA state guidelines<sup>39</sup>. The calculation of acute noncancer impacts is similar to the procedure for chronic noncancer impacts. In most cases, for a single substance, the acute Hazard Quotient is the highest one hour air concentration divided by the acute REL for that substance. There are a few substances that have acute RELs for exposure periods other than 1 hour. In those cases, the maximum air concentration for the appropriate exposure period (e.g., 8 hours) is divided by the acute REL.

As with the chronic noncancer calculation, for multiple substances that impact the same organ system, the individual substance HQs are summed to determine the HI.

No exposure period adjustments are necessary for acute health impact calculations.

Acute exposures are calculated for the inhalation pathway only.

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<sup>38</sup> OEHHA Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk, June 2002

# **Appendix A**

## **Meteorological Data**

## **1.0 Preparing Meteorological Data for Refined Modeling**

AERMOD and ISC models require actual hourly meteorological conditions as inputs. The refined models require pre-processed meteorological data that contains information on surface characteristics and upper air definition. This data is typically provided in a raw or partially processed format that requires processing through a meteorological pre-processor. The ISC models make use of a pre-processor called PCRAMMET, while AERMOD uses a pre-processor known as AERMET described further in the following sections.

Airport surface data is available from the National Climatic Data Center (NCDC) and other sources. Mixing height data or upper air data were available from NCDC. If mixing heights have not been calculated for the year of interest, mixing height software is available from EPA for use in calculating mixing heights from upper air data. AERMET is used to process upper air and surface data for use in AERMOD. Unlike PCRAMMET, AERMET produces 2 files: a surface file (\*.sfc) and a profile file (\*.pfl).

### **1.1 Surface Data**

#### **1.1.1 Screening Meteorological Data**

Screening surface data may be used in ISC when no applicable surface data is available for the area to be modeled. Most user interface on the market today can generate screening meteorological data for ISC. Please contact the district before using screening meteorological data to ensure that no data is available for the area of concern.

#### **1.1.2 Hourly Meteorological Data**

Hourly surface data is supported in several formats including:

- CD-144 – NCDC Surface Data: This file is composed of one record per hour, with all weather elements reported in an 80-column card image. Table 1.0 lists the data contained in the CD-144 file format that is needed to pre-process your meteorological data.

**Table 1.0 – CD-144 Surface Data Record (80 Byte Record)**

<b>Element</b>	<b>Columns</b>
Surface Station Number	1-5
Year	6-7
Month	8-9
Day	10-11
Hour	12-13
Ceiling Height (Hundreds of Feet)	14-16
Wind Direction (Tens of Degrees)	39-40
Wind Speed (Knots)	41-42
Dry Bulb Temperature (° Fahrenheit)	47-49
Opaque Cloud Cover	79

- MET-144 – SCRAM Surface Data: The SCRAM surface data format is a reduced version of the CD-144 data with fewer weather variables (28-character record). Table 1.1 lists the data contained in the SCRAM file format.

**Table 1.1 - SCRAM Surface Data Record (28 Byte Record)**

<b>Element</b>	<b>Columns</b>
Surface Station Number	1-5
Year	6-7
Month	8-9
Day	10-11
Hour	12-13
Ceiling Height (Hundreds of Feet)	14-16
Wind Direction (Tens of Degrees)	17-18
Wind Speed (Knots)	19-21
Dry Bulb Temperature (° Fahrenheit)	22-24
Total Cloud Cover (Tens of Percent)	25-26
Opaque Cloud Cover (Tens of Percent)	27-28

- The SCRAM data does not contain the following weather variables, which are necessary for dry and wet particle deposition analysis:
  - Surface pressure: for dry and wet particle deposition;
  - Precipitation type: for wet particle deposition only; or
  - Precipitation amount: for wet particle deposition only.

- SAMSON Surface Data: The SAMSON data contains all of the required meteorological variables for concentration, dry and wet particle deposition, and wet vapor deposition.
- NCDC data can be purchase online from the following web site:  
<http://cdo.ncdc.noaa.gov/qclcd/QCLCD>

If the processing of raw data is necessary, the surface data must be in one of the above formats in order to successfully pre-process the data using PCRAMMET or AERMET.

## 2.0 Mixing Height and Upper Air Data

Upper air data, also known as mixing height data, are required for pre-processing meteorological data required to run the ISC models. It is recommended that only years with complete mixing height data be used. In some instances, mixing height data may need to be obtained from more than one station to complete multiple years of data.

Mixing height data are available from:

- SCRAM BBS –download free of charge, mixing height data for the U.S. for years 1984 through 1991.
- WebMET.com –download free of charge, mixing height and upper air data from across North America, including Ontario.
- Free Upper air data can be downloaded from following web site (FSL Format)  
<http://raob.fsl.noaa.gov/>
- Table 2.1 lists the format of the mixing height data file used by PCRAMMET.

**Table 2.1 - Upper Air Data File (SCRAM / NCDC TD-9689 Format)**

Element	Columns
Upper Air Station Number (WBAN)	1-5
Year	6-7
Month	8-9
Day	10-11
AM Mixing Value	14-17
PM Mixing Value (NCDC)	25-28
PM Mixing Value (SCRAM)	32-35

AERMOD requires the full upper air sounding, unlike ISCST3/ISC-PRIME, which only require the mixing heights. The upper air soundings must be in the NCDC TD-6201 file format or one of the FSL formats.

## 2.1 AERMET and the AERMOD Model

The AERMET program is a meteorological preprocessor that prepares hourly surface data and upper air data for use in the U.S. EPA air quality dispersion model AERMOD. AERMET was designed to allow for future enhancements to process other types of data and to compute boundary layer parameters with different algorithms.

AERMET processes meteorological data in three stages:

- The first stage (Stage1) extracts meteorological data from archive data files and processes the data through various quality assessment checks.
- The second stage (Stage2) merges all data available for 24-hour periods (surface data, upper air data, and on-site data) and stores these data together in a single file.
- The third stage (Stage3) reads the merged meteorological data and estimates the necessary boundary layer parameters for use by AERMOD.

Out of this process two files are written for AERMOD:

- A Surface File of hourly boundary layer parameters estimates;
- A Profile File of multiple-level observations of wind speed, wind direction, temperature, and standard deviation of the fluctuating wind components.

## 2.2 PCRAMMET

The PCRAMMET program is a meteorological preprocessor, which prepares NWS data for use in the various U.S. EPA air quality dispersion models such as ISCST3/ISC-PRIME.

PCRAMMET is also used to prepare meteorological data for use by the CAL3QHCR model.

The operations performed by PCRAMMET include:

- Calculating hourly values for atmospheric stability from meteorological surface observations;
- Interpolating the twice daily mixing heights to hourly values;
- Optionally, calculating the parameters for dry and wet deposition processes;
- Outputting data in the standard (PCRAMMET unformatted) or ASCII format required by regulatory air quality dispersion models.

The input data requirements for PCRAMMET depend on the dispersion model and the model options for which the data is being prepared. The minimum input data requirements for PCRAMMET are:

- The twice-daily mixing heights,
- The hourly surface observations of: wind speed, wind direction, dry bulb temperature, opaque cloud cover, and ceiling height.

For dry deposition estimates, station pressure measurements are required. For wet deposition estimates, precipitation type and precipitation amount measurements for those periods where precipitation was observed are required.

The surface and upper air stations should be selected to ensure they are meteorologically representative of the general area being modeled.

## **2.3 Regional Meteorological Data**

The district has/may prepare regional meteorological data sets for use in Tier 2 modeling in several formats. Please contact the District to determine what data is available:

- Regional pre-processed model ready data for AERMOD, with land characteristics for RURAL and URBAN conditions.
- Regional Merge files enabling customized surface characteristics to be specified and processed through AERMET Stage3.
- Hourly surface and upper air data files preprocessed for use in ISCST.

### **2.3.1 Pre-Processing Steps**

Regional data for AERMOD can be processed in 2 forms:

- Merged: Data that has been processed through Stage2 of AERMET (AERMET stages are described in Section 7.1.3) to produce a “Merge” file. This file can then be processed through AERMET Stage3 with custom surface condition data to produce a meteorological data set specific to the site for use with AERMOD (Tier 3).
- Regional: Data that has been processed through Stage3 of AERMET with predefined Land Use characteristics for “Urban” and “Rural” environments. This data is ready for use with AERMOD (Tier 2).

#### **2.3.1.1 Regional Meteorological Data Processing Background**

Regional meteorological datasets are generated in AERMET, Stage3 processing step, using different wind independent surface conditions. It is assumed that surface conditions can be a weighted average over a radius of 3 km from the meteorological station and split into 12 sectors, or processed with other parameters approved by the district. The surface conditions needed are the albedo (A), the Bowen ratio (Bo) and the surface roughness (Zo). These parameter values can be derived from data in Tables 6.1, 6.2, 6.3 and 4.3 of the AERMET User’s Guide<sup>1</sup>.

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<sup>1</sup> U.S. Environmental Protection Agency, 1998. Revised Draft - User’s Guide for the AERMOD Meteorological Preprocessor (AERMET). Office of Air Quality Planning and Standards, Research Triangle Park, NC.

## **2.4 Availability and Use of District Meteorological Data**

The district may provide meteorological data sets that can be used for air quality studies using ISCST or AERMOD. The data sets should not be modified. Use of custom meteorological data that is locally representative of site conditions can be created and applied for Tier 3 modeling analyses with district approval.

Meteorological data quality is of critical importance, particularly for reliable air dispersion modeling using refined models such as AERMOD. Meteorological data should be collected, processed and analyzed throughout the entire creation phase for completeness and quality control. Missing meteorological data and calm wind conditions can be handled by using EPA's missing data guidance document written by Russ Lee or guidance provided by the District.

The following factors determine the appropriateness of a meteorological data set, the:

- proximity of the meteorological site to the area being modeled,
- complexity of the terrain,
- exposure of the meteorological measurement site, and the
- time period of the data collection.

It should be emphasized that both the spatial and temporal aspects of the data set are the key requirement for determining the appropriateness of a meteorological data set. Not one, but all of these factors must be considered.

The meteorological data that is input to a model should be selected based on its appropriateness for the modeling project. More specifically, the meteorological data should be representative of the wind flow in the area being modeled, so that it can properly represent the transport and diffusion of the pollutants being modeled.

## **2.5 Expectations for Local Meteorological Data Use**

Local meteorological data must be quality reviewed and the origin of the data and any formatting applied to the raw data must be outlined. The regulatory agency should review the plans to use local meteorological data prior to submission of a modeling report.

The sources of all of the data used including cloud data and upper air data must be documented. The proponent also needs to describe why the site chosen is representative for the modeling application. This would include a description of any topographic impacts or impacts from obstructions (trees, buildings etc.) on the wind monitor. Information on the heights at which the wind is measured is also required. The time period of the measurements along with the data completeness and the percentage of calm winds should be reported.

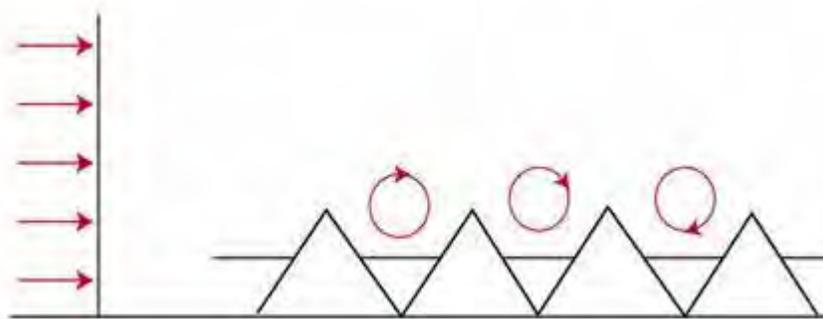
Wind roses showing the wind speed and directions should be provided with the modeling assessment. If wind direction dependent land use was used in deriving the final meteorological file, the selection of the land use should be described.

### 3.0 Land Use Characterization (AERMOD only)

Land use plays an important role in air dispersion modeling from meteorological data processing to defining modeling characteristics such as urban or rural conditions. Land use data can be obtained from digital and paper land-use maps.

These maps will provide an indication into the dominant land use types within an area of study, such as industrial, agricultural, forested and others. This information can then be used to determine dominant dispersion conditions and estimate values for parameters such as surface roughness, albedo, and Bowen ratio.

- **Surface Roughness Length [m]:** The surface roughness length, also referred to surface roughness height, is a measure of the height of obstacles to the wind flow. Surface roughness affects the height above local ground level that a particle moves from the ambient airflow above the ground into a “captured” deposition region near the ground. This height is not equal to the physical dimensions of the obstacles, but is generally proportional to them. Table 1.4 lists typical values for a range of land-use types as a function of season.



**Figure 1.0 - For many modeling applications, surface roughness can be considered to be on the order of one tenth of the height of the roughness elements.**

EPA has developed a modeling tool called AERSURFACE<sup>2</sup> to aid in obtaining realistic and reproducible surface characteristic values of albedo, Bowen ratio, and surface roughness length, for input to AERMET. The tool uses publicly available national land cover datasets and look-up tables of surface characteristics that vary by land cover type and season. AERSURFACE calculates the following 3 parameters for input into AERMET:

<sup>2</sup> AERSURFACE User's Guide, EPA-454/B-08-001 January 2008, [http://www.epa.gov/scram001/dispersion\\_related.htm#aersurface](http://www.epa.gov/scram001/dispersion_related.htm#aersurface)

- **Surface Roughness:**  
The determination of the surface roughness length should be based on an inverse distance weighted geometric mean for a default upwind distance of 1 kilometer relative to the measurement site. Surface roughness length may be varied by sector to account for variations in land cover near the measurement site; however, the sector widths should be no smaller than 30 degrees.
- **Bowen Ratio:**  
The determination of the Bowen ratio should be based on a simple unweighted geometric mean (i.e., no direction or distance dependency) for a representative domain, with a default domain defined by a 10km by 10km region centered on the measurement site.
- **Albedo:**  
The determination of the albedo should be based on a simple unweighted arithmetic mean (i.e., no direction or distance dependency) for the same representative domain as defined for Bowen ratio, with a default domain defined by a 10km by 10km region centered on the measurement site.

AERMOD allows wind direction dependent surface characteristics to be used in the processing of the meteorological data. The AERMET procedure also uses the area-weighted average of the land use within 3 km of the site. The selection of wind direction dependent sectors is described in sections 3.1 to 3.3.

Alternative methods of determining surface roughness height may be proposed. The district should review any proposed values prior to use.

**Table 3.1 –USGS NLCD92 Land Cover Categories used in AERSURFACE**

<b>Classification</b>	<b>Class Number</b>	<b>Land Cover Category</b>
<b>Water</b>	<b>11</b>	<b>Open Water</b>
	<b>12</b>	<b>Perennial Ice/Snow</b>
<b>Developed</b>	<b>21</b>	<b>Low Intensity Residential</b>
	<b>22</b>	<b>High Intensity Residential</b>
	<b>23</b>	<b>Commercial/Industrial/Transportation</b>
<b>Barren</b>	<b>31</b>	<b>Bare Rock/Sand/Clay</b>
	<b>32</b>	<b>Quarries/Strip Mines/Gravel Pits</b>
	<b>33</b>	<b>Transitional</b>
<b>Forested Upland</b>	<b>41</b>	<b>Deciduous Forest</b>
	<b>42</b>	<b>Evergreen Forest</b>
	<b>43</b>	<b>Mixed Forest</b>
<b>Shrubland</b>	<b>51</b>	<b>Shrubland</b>
<b>Non-natural Woody</b>	<b>61</b>	<b>Orchards/Vineyards/Other</b>
<b>Herbaceous Upland</b>	<b>71</b>	<b>Grasslands/Herbaceous</b>
<b>Herbaceous Planted/Cultivated</b>	<b>81</b>	<b>Pasture/Hay</b>
	<b>82</b>	<b>Row Crops</b>
	<b>83</b>	<b>Small Grains</b>
	<b>84</b>	<b>Fallow</b>
	<b>85</b>	<b>Urban/Recreational Grasses</b>
<b>Wetlands</b>	<b>91</b>	<b>Woody Wetlands</b>
	<b>92</b>	<b>Emergent Herbaceous Wetlands</b>

**Table 3.2 –AERSURFACE Seasonal Category Description**

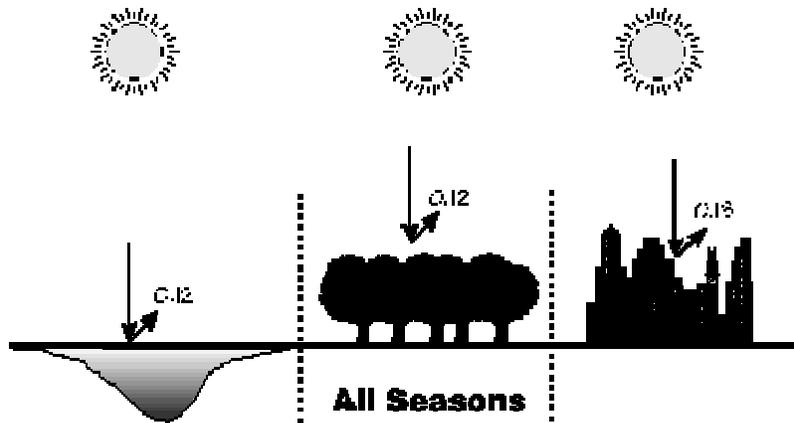
<b>Seasonal Category</b>	<b>Season Description</b>	<b>Default Month Assignments</b>
<b>1</b>	<b>Midsummer with lush vegetation</b>	<b>Jun, Jul, Aug</b>
<b>2</b>	<b>Autumn with unharvested cropland</b>	<b>Sep, Oct, Nov</b>
<b>3</b>	<b>Late autumn after frost and harvest, or winter with no snow</b>	<b>Dec, Jan, Feb</b>
<b>4</b>	<b>Winter with continuous snow on ground</b>	<b>Dec, Jan, Feb</b>
<b>5</b>	<b>Transitional spring with partial green coverage or short annuals</b>	<b>Mar, Apr, May</b>

**Table 3.3 AERSURFACE Seasonal Values of Surface Roughness for the NLCD92 21-Land Cover Classification System**

Class Number	Class Name	Seasonal Surface Roughness (m)				
		1	2	3	4	5
11	Open Water	0.001	0.001	0.001	0.001	0.001
12	Perennial Ice/Snow	0.002	0.002	0.002	0.002	0.002
21	Low Intensity Residential	0.54	0.54	0.50	0.50	0.52
22	High Intensity Residential	1	1	1	1	1
23	Commercial/Industrial/Transportation (Site at airport)	0.1	0.1	0.1	0.1	0.1
	Commercial/Industrial/Transportation (Not at airport)	0.8	0.8	0.8	0.8	0.8
31	Bare Rock/Sand/Clay (Arid Region)	0.05	0.05	0.05	NA	0.05
	Bare Rock/Sand/Clay (Non-arid Region)	0.05	0.05	0.05	0.05	0.05
32	Quarries/Strip Mines/Gravel Pits	0.3	0.3	0.3	0.3	0.3
33	Transitional	0.2	0.2	0.2	0.2	0.2
41	Deciduous Forest	1.3	1.3	0.6	0.5	1
42	Evergreen Forest	1.3	1.3	1.3	1.3	1.3
43	Mixed Forest	1.3	1.3	0.95	0.9	1.15
51	Shrubland (Arid Region)	0.15	0.15	0.15	NA	0.15
	Shrubland (Non-arid Region)	0.3	0.3	0.3	0.15	0.3
61	Orchards/Vineyards/Other	0.3	0.3	0.1	0.5	0.2
71	Grasslands/Herbaceous	0.1	0.1	0.01	0.005	0.05
81	Pasture/Hay	0.15	0.15	0.02	0.01	0.03
82	Row Crops	0.2	0.2	0.02	0.01	0.03
83	Small Grains	0.15	0.15	0.02	0.01	0.03
84	Fallow	0.05	0.05	0.02	0.01	0.02
85	Urban/Recreational Grasses	0.02	0.015	0.01	0.005	0.015
91	Woody Wetlands	0.7	0.7	0.6	0.5	0.7
92	Emergent Herbaceous Wetlands	0.2	0.2	0.2	0.1	0.2

- Noon-Time Albedo:

Noon-time albedo is the fraction of the incoming solar radiation that is reflected from the ground when the sun is directly overhead. Table 3.4 lists typical albedo values as a function of several land use types and season. For practical purposes, the selection of a single value for noon-time albedo, for a land use types and season combination, to process a complete year of meteorological data is desirable. If other conditions are used, the district should review the proposed noon-time albedo values used to pre-process the meteorological data.



**Table 3.4 AERSURFACE Seasonal Values of Albedo for the NLCD92 21-Land Cover Classification System**

Class Number	Class Name	Seasonal Albedo Values				
		1	2	3	4	5
11	Open Water	0.1	0.1	0.1	0.1	0.1
12	Perennial Ice/Snow	0.6	0.6	0.7	0.7	0.6
21	Low Intensity Residential	0.16	0.16	0.18	0.45	0.16
22	High Intensity Residential	0.18	0.18	0.18	0.35	0.18
23	Commercial/Industrial/Transportation (Site at airport)	0.18	0.18	0.18	0.35	0.18
	Commercial/Industrial/Transportation (Not at airport)	0.18	0.18	0.18	0.35	0.18
31	Bare Rock/Sand/Clay (Arid Region)	0.2	0.2	0.2	NA	0.2
	Bare Rock/Sand/Clay (Non-arid Region)	0.2	0.2	0.2	0.6	0.2
32	Quarries/Strip Mines/Gravel Pits	0.2	0.2	0.2	0.6	0.2
33	Transitional	0.18	0.18	0.18	0.45	0.18
41	Deciduous Forest	0.16	0.16	0.17	0.5	0.16
42	Evergreen Forest	0.12	0.12	0.12	0.35	0.12
43	Mixed Forest	0.14	0.14	0.14	0.42	0.14
51	Shrubland (Arid Region)	0.25	0.25	0.25	NA	0.25
	Shrubland (Non-arid Region)	0.18	0.18	0.18	0.5	0.18
61	Orchards/Vineyards/Other	0.18	0.18	0.18	0.5	0.14
71	Grasslands/Herbaceous	0.18	0.18	0.2	0.6	0.18
81	Pasture/Hay	0.2	0.2	0.18	0.6	0.14
82	Row Crops	0.2	0.2	0.18	0.6	0.14
83	Small Grains	0.2	0.2	0.18	0.6	0.14
84	Fallow	0.18	0.18	0.18	0.6	0.18
85	Urban/Recreational Grasses	0.15	0.15	0.18	0.6	0.15
91	Woody Wetlands	0.14	0.14	0.14	0.3	0.14
92	Emergent Herbaceous Wetlands	0.14	0.14	0.14	0.3	0.14

- Bowen Ratio:

The Bowen ratio is a measure of the amount of moisture at the surface. The presence of moisture at the earth's surface alters the energy balance, which in turn alters the sensible heat flux and Monin-Obukhov length. Table 3.5 lists Bowen ratio values as a function of land-use types, seasons and moisture conditions. Bowen ratio values vary depending on the surface wetness. Average moisture conditions would be the usual choice for selecting the Bowen ratio. If other conditions are used the district should review the proposed Bowen ratio values used to pre-process the meteorological data.

**Table 3.5 AERSURFACE Seasonal Values of Bowen Ratio for the NLCD92 21-Land Cover Classification System - Average moisture conditions**

Class Number	Class Name	Seasonal Bowen Ratio Values-Average				
		1	2	3	4	5
11	Open Water	0.1	0.1	0.1	0.1	0.1
12	Perennial Ice/Snow	0.5	0.5	0.5	0.5	0.5
21	Low Intensity Residential	0.8	1	1	0.5	0.8
22	High Intensity Residential	1.5	1.5	1.5	0.5	1.5
23	Commercial/Industrial/Transportation (Site at airport)	1.5	1.5	1.5	0.5	1.5
	Commercial/Industrial/Transportation (Not at airport)	1.5	1.5	1.5	0.5	1.5
31	Bare Rock/Sand/Clay (Arid Region)	4	6	6	NA	3
	Bare Rock/Sand/Clay (Non-arid Region)	1.5	1.5	1.5	0.5	1.5
32	Quarries/Strip Mines/Gravel Pits	1.5	1.5	1.5	0.5	1.5
33	Transitional	1	1	1	0.5	1
41	Deciduous Forest	0.3	1	1	0.5	0.7
42	Evergreen Forest	0.3	0.8	0.8	0.5	0.7
43	Mixed Forest	0.3	0.9	0.9	0.5	0.7
51	Shrubland (Arid Region)	4	6	6	NA	3
	Shrubland (Non-arid Region)	1	1.5	1.5	0.5	1
61	Orchards/Vineyards/Other	0.5	0.7	0.7	0.5	0.3
71	Grasslands/Herbaceous	0.8	1	1	0.5	0.4
81	Pasture/Hay	0.5	0.7	0.7	0.5	0.3
82	Row Crops	0.5	0.7	0.7	0.5	0.3
83	Small Grains	0.5	0.7	0.7	0.5	0.3
84	Fallow	0.5	0.7	0.7	0.5	0.3
85	Urban/Recreational Grasses	0.5	0.7	0.7	0.5	0.3
91	Woody Wetlands	0.2	0.2	0.3	0.5	0.2
92	Emergent Herbaceous Wetlands	0.1	0.1	0.1	0.5	0.1

**Table 3.6 AERSURFACE Seasonal Values of Bowen Ratio for the NLCD92 21-Land Cover Classification System - Wet moisture conditions**

Class Number	Class Name	Seasonal Bowen Ratio Values- Wet				
		1	2	3	4	5
11	Open Water	0.1	0.1	0.1	0.1	0.1
12	Perennial Ice/Snow	0.5	0.5	0.5	0.5	0.5
21	Low Intensity Residential	0.6	0.6	0.6	0.5	0.6
22	High Intensity Residential	1	1	1	0.5	1
23	Commercial/Industrial/Transportation (Site at airport)	1	1	1	0.5	1
	Commercial/Industrial/Transportation (Not at airport)	1	1	1	0.5	1
31	Bare Rock/Sand/Clay (Arid Region)	1.5	2	2	NA	1
	Bare Rock/Sand/Clay (Non-arid Region)	1	1	1	0.5	1
32	Quarries/Strip Mines/Gravel Pits	1	1	1	0.5	1
33	Transitional	0.7	0.7	0.7	0.5	0.7
41	Deciduous Forest	0.2	0.4	0.4	0.5	0.3
42	Evergreen Forest	0.2	0.3	0.3	0.5	0.3
43	Mixed Forest	0.2	0.35	0.35	0.5	0.3
51	Shrubland (Arid Region)	1.5	2	2	NA	1
	Shrubland (Non-arid Region)	0.8	1	1	0.5	0.8
61	Orchards/Vineyards/Other	0.3	0.4	0.4	0.5	0.2
71	Grasslands/Herbaceous	0.4	0.5	0.5	0.5	0.3
81	Pasture/Hay	0.3	0.4	0.4	0.5	0.2
82	Row Crops	0.3	0.4	0.4	0.5	0.2
83	Small Grains	0.3	0.4	0.4	0.5	0.2
84	Fallow	0.3	0.4	0.4	0.5	0.2
85	Urban/Recreational Grasses	0.3	0.4	0.4	0.5	0.2
91	Woody Wetlands	0.1	0.1	0.1	0.5	0.1
92	Emergent Herbaceous Wetlands	0.1	0.1	0.1	0.5	0.1

**Table 3.7 AERSURFACE Seasonal Values of Bowen Ratio for the NLCD92 21-Land Cover Classification System - Dry moisture conditions**

Class Number	Class Name	Seasonal Bowen Ratio Values-Dry				
		1	2	3	4	5
11	Open Water	0.1	0.1	0.1	0.1	0.1
12	Perennial Ice/Snow	0.5	0.5	0.5	0.5	0.5
21	Low Intensity Residential	2	2.5	2.5	0.5	2
22	High Intensity Residential	3	3	3	0.5	3
23	Commercial/Industrial/Transportation (Site at airport)	3	3	3	0.5	3
	Commercial/Industrial/Transportation (Not at airport)	3	3	3	0.5	3
31	Bare Rock/Sand/Clay (Arid Region)	6	10	10	NA	5
	Bare Rock/Sand/Clay (Non-arid Region)	3	3	3	0.5	3
32	Quarries/Strip Mines/Gravel Pits	3	3	3	0.5	3
33	Transitional	2	2	2	0.5	2
41	Deciduous Forest	0.6	2	2	0.5	1.5
42	Evergreen Forest	0.6	1.5	1.5	0.5	1.5
43	Mixed Forest	0.6	1.75	1.75	0.5	1.5
51	Shrubland (Arid Region)	6	10	10	NA	5
	Shrubland (Non-arid Region)	2.5	3	3	0.5	2.5
61	Orchards/Vineyards/Other	1.5	2	2	0.5	1
71	Grasslands/Herbaceous	2	2	2	0.5	1
81	Pasture/Hay	1.5	2	2	0.5	1
82	Row Crops	1.5	2	2	0.5	1
83	Small Grains	1.5	2	2	0.5	1
84	Fallow	1.5	2	2	0.5	1
85	Urban/Recreational Grasses	1.5	2	2	0.5	1
91	Woody Wetlands	0.2	0.2	0.2	0.5	0.2
92	Emergent Herbaceous Wetlands	0.2	0.2	0.2	0.5	0.2

### 3.1 Wind Direction Dependent Land Use

AERMET also provides the ability to specify land characteristics for up to 12 different contiguous, non-overlapping wind direction sectors that define unique upwind surface characteristics. The following properties of wind sectors must be true:

- The sectors are defined clockwise as the direction from which the wind is blowing, with north at 360°.
- The sectors must cover the full circle so that the end value of one sector matches the beginning of the next sector.

- The beginning direction is considered part of the sector, while the ending direction is not.

Each wind sector can have a unique albedo, Bowen ratio, and surface roughness. Furthermore, these surface characteristics can be specified annually, seasonally, or monthly to better reflect site conditions.

## 3.2 Mixed Land Use Types

Study areas may contain several different regions with varying land use. This can be handled by AERMET through the use of wind sector specific characterization, as described in the previous section.

For models such as ISCST3/ISC-PRIME that do not take advantage of sector-specific characterization, the most representative conditions should be applied when land use characteristics are required.

The surface characteristics need to be assessed in a circle with a radius of one to three kilometers from the source. Contact the District to determine the appropriate parameters for meteorological data in accordance with EPA guidance. Data should be chosen for a meteorological data site with surface characteristics similar to those of the area around the source. To prepare the surface data, use the AERSURFACE module of AERMOD or perform a site survey using the standard land uses defined in the AERSURFACE documentation and the default surface roughness length for those land uses.

The surface characteristics are determined by assessing the land use across the monitoring site area and applying the appropriate values to the land characteristic parameters. A weighted average is then computed based on the area of each land use category.

**For example:** If the area under review is 15% cultivated land, 5% desert shrub land, and 80% Urban, the same weighted percentages would be used to derive a weighted average albedo, Bowen ratio, and surface roughness parameters.

## 3.3 Seasonal Land Use Characterization

Land use characteristics can be susceptible to seasonal variation. For example, winter conditions can bring increased albedo values due to snow accumulation.

AERMET allows for season-specific values for surface roughness, albedo, and Bowen ratio to be defined. Other models, such as ISCST3/ISC-PRIME, do not support multiple season surface characteristics to be defined. In such a case, the most representative conditions should be applied when land use characteristics are required.

### **3.4 Standard and Non-Default Surface Characteristics**

The generation of local meteorological data files can incorporate site-specific surface characteristics. It should be noted that any local meteorological files generated for air dispersion modeling should provide a clear reasoning for the values used to describe surface characteristics. The district should review any proposed surface characteristics prior to submission of a modeling report.

## **Appendix B**

### **Modeling and Exposure Assessment Input and Output Data**

<b>1.0</b>	<b>GENERAL INFORMATION</b>	<b>3</b>
1.0.1	SUBMITTAL DATE	3
1.0.2	FACILITY/PROJECT NAME	3
1.0.3	FACILITY/PROJECT LOCATION	3
1.0.4	RISK ASSESSOR NAME	3
<b>1.1</b>	<b>HAZARD IDENTIFICATION</b>	<b>3</b>
1.1.1	TABLE OF ALL TOXIC AIR CONTAMINANTS (TAC) EMITTED BY THE FACILITY/PROJECT INCLUDING:	3
1.1.2	TABLE OF CARCINOGENS,	3
1.1.3	TABLE OF ACUTELY TOXIC TACs, AND	3
1.1.4	TABLE OF CHRONICALLY TOXIC NON-CARCINOGENIC TACs.	3
1.1.5	TABLE SHOWING THE PROCESSES AND THE TACs EMITTED FROM EACH PROCESS.	3
<b>1.2</b>	<b>EXPOSURE ASSESSMENT</b>	<b>3</b>
1.2.1	<b>AIR DISPERSION MODEL OPTIONS</b>	3
1.2.1.1	<i>Model Used</i>	3
1.2.1.2	<i>Regulatory Options Used</i>	3
1.2.1.4	<i>Coordinate System Used</i>	3
1.2.2	<b>SOURCE INFORMATION</b>	3
1.2.2.1	<i>Source Summaries</i>	3
1.2.2.2	<i>Emissions Profile during Abnormal Operations Start-Up or Shutdown</i>	5
1.2.2.3	<i>Building Downwash</i>	5
1.2.2.4	<i>Scaled Plot Plan</i>	5
1.2.2.5	<i>Sensitive Receptors locations</i>	5
1.2.2.6	<i>Points of Maximum Impact</i>	6
1.2.3	<b>TERRAIN CONDITIONS</b>	6
1.2.3.1	<i>Elevated or complex terrain</i>	6
1.2.3.2	<i>Digital Terrain Data</i>	6
1.2.3.3	<i>Elevation data import</i>	6
1.2.4	<b>METEOROLOGICAL DATA</b>	6
1.2.4.1	<i>Regional Meteorological data</i>	6
1.2.4.2	<i>Was a Regional Meteorological Merge data file used?</i>	6
1.2.4.3	<i>Meteorological data preparation</i>	6
1.2.4.4	<i>Local Meteorological data</i>	6
1.2.4.5	<i>Wind Information</i>	6
1.2.4.6	<i>Temperature, clouds, and upper air data</i>	7
1.2.4.7	<i>Turbulence</i>	7
1.2.5	<b>DISPERSION MODEL RESULTS</b>	7
1.2.5.1	<i>Modeling files</i>	7
1.2.5.2	<i>Meteorological Data</i>	7
1.2.5.3	<i>Terrain Data</i>	7
1.2.5.3	<i>Plots and Maps</i>	7
1.2.5.5	<i>Emission Summary</i>	7
1.2.5.6	<i>Discussion</i>	7
<b>1.3</b>	<b>TOXICITY DATA</b>	<b>7</b>
1.3.1	<b>TOXICITY VALUES FOR EACH TAC EMITTED</b>	7
1.3.2	<b>TARGET ORGAN SYSTEMS FOR EACH ACUTE AND NON-CARCINOGENIC CHRONIC SUBSTANCE</b>	8
<b>1.4</b>	<b>RISK CHARACTERIZATION</b>	<b>8</b>
1.4.1	<b>POINTS OF MAXIMUM IMPACT</b>	8
1.4.2	<b>EXPOSURE PATHWAYS</b>	8
1.4.3	<b>GRAPHICAL PRESENTATIONS</b>	8
1.4.4	<b>GUIDELINES AND SOFTWARE</b>	8
<b>2.0</b>	<b>MODELING FILES</b>	<b>8</b>

The following information must be submitted with a risk assessment. It provides the essential requirements for a general assessment. Site-specific scenarios may call for additional information and result in a need for different materials and data to be submitted. It is the responsibility of the submitter to ensure proper completion and analysis of any air dispersion modeling assessment delivered for review. *Consultation with your local air district is strongly recommended.*

## **1.0 General Information**

- 1.0.1** Submittal Date
- 1.0.2** Facility/Project Name
- 1.0.3** Facility/Project Location
- 1.0.4** Risk Assessor Name

## **1.1 Hazard Identification**

- 1.1.1** Table of all toxic air contaminants (TAC) emitted by the Facility/Project including:
  - CAS number,
  - Chemical name(s) – include appropriate common names,
  - Physical state as emitted.
- 1.1.2** Table of carcinogens,
- 1.1.3** Table of acutely toxic TACs, and
- 1.1.4** Table of chronically toxic non-carcinogenic TACs.
- 1.1.5** Table showing the processes and the TACs emitted from each process.

## **1.2 Exposure Assessment**

### **1.2.1 Air Dispersion Model Options**

#### **1.2.1.1 Model Used**

- AERMOD - version number,
- ISCST - version number,
- Other Model - Specify name, version number, and reason for use.

#### **1.2.1.2 Regulatory Options Used**

- Yes
- No - Provide justification for use of non-regulatory options. Note that use of non-regulatory options requires prior approval from the regulatory agency.

#### **1.2.1.3 Dispersion Coefficients Used, and How they were Determined**

- Urban
- Rural

(Urban or Rural conditions can be determined through the use of an Auer Land Use or Population Density analysis.)

#### **1.2.1.4 Coordinate System Used**

- UTM Coordinates
- Local Coordinates
- Other

(AERMOD requires UTM coordinates be used to define all model objects. Use of an alternative coordinate system requires advance consultation with the regulatory agency.)

### **1.2.2 Source Information**

#### **1.2.2.1 Source Summaries**

Create tables which show the following point, area, volume, line, or flare modeling parameters. Following the tables must be a description of the reasoning for each modeling parameter chosen.

#### Point Sources Summary

- Source name
- Source location coordinates
  - X (m)
  - Y (m)
- Table showing the names of each TAC modeled and max hourly and annual emission rate in grams per second.
- Stack heights in meters
- Stack Diameter in meters
- Stack Exit Temperature in degrees K
- Stack Exit Velocity in meters per second
- Stack direction
  - Vertical exhaust direction
  - Horizontal exhaust direction
- Rain Cap Present  
If the stack is either horizontal in orientation or has a rain cap, stack parameters must be adjusted as per guidance.
- Operating Schedule.  
Create tables showing how the normal emission rates vary by source.

#### Area Sources Summary

- Source name
- Source location coordinates (Southwest Vertex):
  - X (m)
  - Y (m)
- Table showing the names of each TAC modeled and emission rate in grams per second-meter<sup>2</sup>.
- Exhaust height in meters
- Easterly Dimension in meters
- Northerly Dimension in meters
- Initial Vertical Dimension in meters
- Angle from North in degrees.
- Operating Schedule.  
Create tables showing how the normal emission rates vary by source.

#### Volume Sources Summary

- Source name
- Source location coordinates (Center of Source):
  - X (m)
  - Y (m)
- Table showing the names of each TAC modeled and emission rate in grams per second.
- Source height in meters
- Initial Horizontal Dimension in meters
- Initial Vertical Dimension in meters

- Operating Schedule.  
Create tables showing how the normal emission rates vary by source.

Line Sources Summary (CAL3QHCR specific; for step by step guidance according to SMAQMD recommendations, see CAPCOA's CEQA Risk Assessment Guidelines)

- Source name (highway, freeway, or major roadway)
- Roadway compass orientation (in terms of x,y; arbitrary origin of 0,0)
- Location of nearest receptor to source and other receptors as required by local air district
- Calculation averaging time (such as 60 min)
- Surface roughness (cm, from 3 to 400)
- Settling velocity (cm/s)
- Deposition velocity (cm/s)
- Site setting, rural or urban
- Form of traffic volume (recommended: 1 for one hour's data)
- Pollutant (P for PM10)
- Hourly ambient background (0 or as recommended by air district)
- Roadway height indicator (AG for at grade; FL for elevated and filled; BR for bridge; DP for depressed)
- Roadway height (AG is 0)

Other input parameters are required for CAL3QHCR. See CAPCOA's CEQA Risk Assessment Guidelines or contact your local air district.

#### 1.2.2.2 Emissions Profile during Abnormal Operations Start-Up or Shutdown

Create table showing how abnormal emission rates vary by source. Abnormal emission rates include start-up or shutdown.

#### 1.2.2.3 Building Downwash

- Describe whether the stack(s) are located within 5L of a structure that is at least 40% of the stack height (L is the lesser of the height or the maximum projected building width for a structure).
- If it is, then prepare a building downwash analysis using the current version of the Building Profile Input Program – PRIME (BPIP-PRIME) and include results in air dispersion modeling assessment.

#### 1.2.2.4 Scaled Plot Plan

Provide a scaled plot plan, preferably in electronic format, displaying:

- Emission release locations,
- Buildings (On site and neighboring),
- Tanks (On site and neighboring),
- Property boundaries,
- Model receptor locations,
- Sensitive receptors locations,
- Fenceline receptors locations.

#### 1.2.2.5 Sensitive Receptors locations

Describe the location and nature of all nearby sensitive receptors (e.g. residences, schools, hospitals, etc...)

#### 1.2.2.6 Points of Maximum Impact

Demonstrate that the actual point of maximum impact, residential point of maximum impact, and the offsite worker point of maximum impact have been reached.

### 1.2.3 Terrain Conditions

#### 1.2.3.1 Elevated or complex terrain

Describe whether the modeled area contains elevated or complex terrain, and provide a discussion on the approach used to determine terrain characteristics of the assessment area.

#### 1.2.3.2 Digital Terrain Data

Describe whether the data for digital terrain is:

- CDED 1-degree,
- CDED 15-minute,
- USGS 7.5-minute Ontario dataset, or
- Other, and describe other.

#### 1.2.3.3 Elevation data import

Describe the technique used to determine elevations of receptors and related model entities such as sources.

### 1.2.4 Meteorological Data

#### 1.2.4.1 Regional Meteorological data

Specify what Regional Meteorological data set was used and note the period of the record.

#### 1.2.4.2 Was a Regional Meteorological Merge data file used?

Specify the Meteorological Data Set Merge file used and summarize land characteristics specified in its processing. This information should be reviewed by the District prior to submission of a modeling report.

#### 1.2.4.3 Meteorological data preparation

Specify the Meteorological Data files used and summarize all steps and values used in processing these standard meteorological data files. This information should be reviewed by the District prior to submission of a modeling report.

#### 1.2.4.4 Local Meteorological data

Specify the source, reliability, and representativeness of the local meteorological data as well as a discussion of data QA/QC and processing of data. State the time period of the measurements, wind direction dependent land use (if used), and any topographic or shoreline influences. This information should be reviewed by the District prior to submission of a modeling report.

#### 1.2.4.5 Wind Information

The following items should be provided and discussed where applicable:

- Speed and direction distributions (wind roses),
- Topographic and/or obstruction impacts,
- Data completeness,

- Percentage of calms

#### 1.2.4.6 Temperature, clouds, and upper air data

The following items should be provided and discussed where applicable:

- Data completeness,
- Mixing layer heights,
- Diurnal and seasonal variations.

#### 1.2.4.7 Turbulence

The following should be provided and discussed if site specific data is being used:

- Frequency distributions,
- Diurnal and seasonal variations.

### 1.2.5 Dispersion Model Results

#### 1.2.5.1 Modeling files

The following electronic model input and output files are to be provided:

- BPIP-PRIME - Input and Output files.
- ISCST3/ISC-PRIME or AERMOD - Input and Output files.
- ISCST3/ISC-PRIME or AERMOD - Plot files
- SCREEN3 - Input and Output files if applicable

#### 1.2.5.2 Meteorological Data

The electronic meteorological data files must be provided.

#### 1.2.5.3 Terrain Data

Digital elevation terrain data files must be provided if included in the analysis.

#### 1.2.5.3 Plots and Maps

Include the following:

- Drawing/site plan with modeling coordinate system noted (digital format preferred).
- Plots displaying concentration/deposition results across study area.

#### 1.2.5.5 Emission Summary

An emission summary table must be provided.

#### 1.2.5.6 Discussion

The results overview should include a discussion of the following items, where applicable:

- The use of alternative models,
- The use of any non-default model options,
- Topographic effects on the predictions,
- All predicted concentrations based on the REL based exposure period.

## 1.3 Toxicity Data

### 1.3.1 Toxicity Values for Each TAC Emitted

A table must be provided that shows the following data for each TAC emitted:

- The cancer potency factors,
- The acute and chronic RELs,
- The averaging times for the acute RELs,

- The pathways the TAC enters the body, and
- The date these factors were updated.

### 1.3.2 Target Organ Systems for Each Acute and Non-Carcinogenic Chronic Substance

A table must be provided that shows the target organs and body systems each acute and non-carcinogenic chronic impact.

## 1.4 Risk Characterization

### 1.4.1 Points of Maximum Impact

The following points of maximum impact need to be identified:

- The Points of Maximum Impact (PMI),
- The Maximum Exposed Individual - Residential (MEIR), and
- The Maximum Exposed Individual – Worker (MEIW).

At these locations the following data must be provided:

- Locations (UTM coordinates, or Latitude/Longitude coordinates, or other coordinates),
- Cancer risk, acute and chronic hazard indices,
- Sources and pollutants that contribute to risks which exceed the district’s cancer risk, or acute, or chronic hazard index significance levels.

### 1.4.2 Exposure Pathways

Identify each pathways used to determine the cancer risk and chronic hazard indices. Provide all assumptions used for pathways (e.g., the percentage of home-grown vegetables consumed locally, etc...).

### 1.4.3 Graphical Presentations

Maps must be provided which show the following:

- Locations of sensitive receptors,
- Location of PMI, MEIR, and MEIW for cancer, acute, and non-cancer chronic risks,
- Isopleth lines showing cancer risk, acute, and chronic hazard indices in magnitudes specified by the Air District (e.g., cancer risk starting at 10 per million and increasing by tens per million.)

### 1.4.4 Guidelines and Software

Specify:

- Describe whether these CAPCOA Guidelines have been applied or other Guidelines were applied,
- The risk assessment software utilized (e.g., Hot Spots Analysis and Reporting Program or HARP),
- If risk assessment software other than HARP is used, then and provide a demonstration that the results will show the same results as HARP,
- Discuss any software used to import model results into HARP.

## 2.0 Modeling Files

The following files from the air quality dispersion model and risk assessment software should be provided:

Air quality dispersion model (if HARP is not used)

- Input file (\*.inp, \*.ADI, \*.dat)
- Output file (\*.out, \*.ADO, \*.lst)
- Meteorological files

- Plotfiles

#### Building Downwash Analysis (BPIP) (if HARP is not used)

- Input file
- Output file

#### Risk assessment software (i.e., HARP):

- Transaction files for the facilities, buildings, and property boundaries (\*.tra)
- Transaction files for the source receptors (\*.rec)
- Facility database for included facilities building, and property boundaries (\*.mdb) as an alternative to the transaction files
- Health factor database (Health.mdb)
- ISC Workbook file with all ISC parameters (\*.isc)
- ISC input file generated by HARP when ISC is run (\*.inp)
- ISC output file generated by HARP when ISC is run (\*.out)
- List of error messages generated by ISC (\*.err)
- Plot file generated by ISC (\*.plt)
- Representative meteorological data used for the facility air dispersion modeling (\*.met)
- Any digital elevation model files (if applicable) (\*.dem)
- Average and maximum  $\chi/Q$  for each source-receptor combination; generated by ISC (\*.xoq)
- ISC binary output file (FOR REFINED ACUTE ANALYSIS ONLY); holds  $\chi/Q$  data for each hour (\*.bin)
- Source/receptor file; contains list of sources and receptors for the ISC run; generated by HARP when you set up ISC (\*.src)
- Emission Rate files (if changes were made to database) (\*.ems)
- Site-specific parameters used for all receptor risk modeling (\*.sit)
- (Screening) Adjustment factor files (IF SCREEN MET IS USED) (\*.adj)
- Point estimate risk reports generated by HARP; this file is updated automatically each time you perform one of the point estimate risk analysis functions ((e.g., acute, chronic, cancer, derived (adjusted). Etc.)) (\*.rsk)
- Database for Census (population) file (census.mdb)
- Map file used to overlay facility and receptors (\*.map)
- HARP Exception Report (ExceptionReport.txt)
- Risk result text files for key receptors (STANDARD REPORT SET) (\*.txt)
- STOCHASTIC Raw sample file (\*.csv)
- STOCHASTIC Sample file (\*.spl)
- STOCHASTIC Summary report (\*.txt)
- Equivalent files for software other than HARP

United States  
Environmental Protection  
Agency

Office of Air Quality  
Planning and Standards  
Research Triangle Park, NC 27711

EPA 454/R-92-019

~~EPA 450/R-92-019~~

October 1992

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Air

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# Screening Procedures for Estimating the Air Quality Impact of Stationary Sources Revised



EPA 454/R-92-019

~~EPA-450/R-92-019~~

OLIS# 2113

# Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Revised

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
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October 1992

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## PREFACE

This document presents current EPA guidance on the use of screening procedures to estimate the air quality impact of stationary sources. The document is an update and revision of the original Volume 10 of the "Guidelines for Air Quality Maintenance Planning and Analysis", and the later Volume 10 (Revised), and is intended to replace Volume 10R as the standard screening procedures for regulatory modeling of stationary sources.

Many of the short-term procedures, outlined in this document, have been implemented in a computerized version in a model entitled SCREEN2. In previous editions of this document, the SCREEN user's guide was contained within an appendix to the document. As of this edition, the SCREEN2 user's guide and documentation is provided as a separate document entitled "SCREEN2 Model User's Guide," EPA-450/4-92-006. Software copies of SCREEN2 may be downloaded from the Office of Air Quality Planning and Standards (OAQPS) Technical Transfer Network (TTN) Bulletin Board System (BBS) via modem by dialing (919) 541-5742. The TTN BBS now serves as the primary source of air dispersion models, replacing the User's Network for Applied Modeling of Air Pollution (UNAMAP). Copies of SCREEN2 in diskette form may be obtained from the National Technical Information Service (NTIS), U.S. Department of Commerce, 5285 Port Royal Road, Springfield, VA 22161.

## ACKNOWLEDGMENTS

Special credit and thanks are due Mr. Thomas E. Pierce, EPA-AREAL, for his assistance with developing the FORTRAN code for the SCREEN model and for his technical suggestions on improving the procedures. Credit is due Mr. Russell F. Lee, who served as EPA Project Officer on the preparation of the original version of the Volume 10 procedures, and who continued to provide valuable technical assistance for this document, and Mr. Laurence J. Budney, author of the revised version of Volume 10, which served as a foundation for development of the current document. The author also acknowledges those who reviewed the document and provided many valuable comments, including the EPA Regional Modeling Contacts, several State meteorologists, and meteorologists within EPA-OAQPS. Credit and thanks are due Mr. Roger W. Brode, for developing the "Screening Procedures for Estimating the Air Quality Impact of Stationary Sources, Draft for Public Comment" documentation for SCREEN. The project officer for SCREEN2, Dennis G. Atkinson, is responsible for the first revision to this document. Mr. Atkinson is on assignment from the National Oceanic and Atmospheric Administration, U.S. Department of Commerce. Final thanks are due James L. Dicke and Joseph A. Tikvart of EPA-OAQPS for their support and insight.

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## LIST OF SYMBOLS

<u>Symbol</u>	<u>Definition</u>
A	Parameter used in building cavity calculations and TIBL height factor
$A_p$	Cross-sectional area of building normal to the wind ( $m^2$ )
B	Parameter used in building cavity calculations
C	Contribution to pollutant concentration ( $g/m^3$ )
$F_b$	Buoyancy flux parameter ( $m^4/s^3$ )
H	Total heat release rate from flare (cal/s)
L	Alongwind horizontal building dimension (length, m)
$L_b$	Lesser of building height or maximum projected width (m)
M	Merged stack parameter
Q	Pollutant emission rate (g/s)
$Q_H$	Sensible heat release rate from flare (cal/s)
R	Net rate of sensible heating by the sun ( $67 \text{ cal}/m^2/s$ )
S	Length of side of square area source (m)
$T_a$	Ambient temperature (K)
$T_s$	Stack gas exit temperature (K)
V	Stack gas volume flow rate ( $m^3/s$ )
W	Crosswind horizontal building dimension (width, m)
$c_p$	Specific heat of air at constant pressure ( $0.24 \text{ cal}/gK$ )
$d_s$	Stack inside diameter (m)
f	Frequency of occurrence of a wind speed and stability category combination
g	Acceleration due to gravity ( $9.806 \text{ m}/s^2$ )
h	Height of release above terrain ( $h = h_s - h_t$ , m)

## LIST OF SYMBOLS (CONT.)

<u>Symbol</u>	<u>Definition</u>
$h_b$	Building height (m)
$h_e$	Plume (or effective stack) height (m)
$h_i$	Height of the top of the plume ( $h_e + 2\sigma_z$ , m)
$h_s$	Physical stack height (m)
$h_T$	Height of the Thermal Internal Boundary Layer (TIBL) (m)
$h_t$	Height of terrain above stack base (m)
$h_{se}$	Effective stack release height for flare (m)
$h_e'$	Plume height modified for stack tip downwash (m)
$m$	Multiplicative factor to account for effects of limited mixing
$p$	Wind speed power law profile exponent
$r$	Factor to adjust 1-hour concentration to longer averaging time
$t_m$	Time required for inversion break-up to extend from stack top to top of plume (s)
$u$	Wind speed (m/s)
$U_c$	Critical wind speed (m/s)
$u_s$	Wind speed at stack height (m/s)
$u_1$	Wind speed at a height of $Z_1$ (m/s)
$u_*$	Friction velocity (m/s)
$u_{10}$	Wind speed at a height of 10m (m/s)
$u\Delta h$	Normalized plume rise ( $m^2/s$ )
$v_s$	Stack gas exit velocity (m/s)
$x$	Downwind distance (m)
$x_{max}$	Downwind distance to maximum ground-level concentration (m)

## LIST OF SYMBOLS (CONT.)

<u>Symbol</u>	<u>Definition</u>
$x_r$	Length of cavity recirculation region (m)
$x_s$	Distance from source to shoreline (m)
$x_y$	Virtual point source distance (m)
$z_i$	Mixing height (m)
$z_m$	Mechanically driven mixing height (m)
$\Delta h$	Plume rise (m)
$\Delta\theta/\Delta z$	Potential temperature gradient with height (K/m)
$\Delta x$	Length of side of urban area (m)
$\pi$	pi (= 3.14159)
$\sigma_y$	Horizontal (lateral) dispersion parameter (m)
$\sigma_{y_0}$	Initial horizontal dispersion parameter for area source (m)
$\sigma_z$	Vertical dispersion parameter (m)
$\chi_B$	Concentration contributions from other (background) sources ( $\text{g}/\text{m}^3$ )
$\chi_f$	Maximum ground-level concentration due to fumigation ( $\text{g}/\text{m}^3$ )
$\chi_{\max}$	Maximum ground-level concentration ( $\text{g}/\text{m}^3$ )
$\chi_p$	Maximum concentration for period greater than 1 hour ( $\text{g}/\text{m}^3$ )
$\chi_1$	Maximum 1-hour ground-level concentration ( $\text{g}/\text{m}^3$ )
$\chi_{24}$	Maximum 24-hour ground-level concentration ( $\text{g}/\text{m}^3$ )
$\chi/Q$	Relative concentration ( $\text{s}/\text{m}^3$ )
$\chi u/Q$	Normalized relative concentration ( $\text{m}^{-2}$ )

## 1. INTRODUCTION

This document is an update and revision of an earlier guideline<sup>1,2</sup> for applying screening techniques to estimate the air quality impact of stationary sources. The application of screening techniques is addressed in Section 4.2.1 of the Guideline on Air Quality Models (Revised).<sup>3</sup> The current document incorporates changes and additions to the technical approach. The techniques are applicable to chemically stable, gaseous or fine particulate pollutants. An important advantage of the current document is that the single source, short-term techniques can be easily executed on an IBM<sup>®</sup> - PC (personal computer) compatible microcomputer with at least 256K of RAM using the SCREEN2 computer code. As with the earlier versions, however, many of the techniques can be applied with a pocket or desk calculator.

The techniques described in this document can be used to evaluate the air quality impact of sources pursuant to the requirements of the Clean Air Act,<sup>4</sup> such as those sources subject to the prevention of significant deterioration (PSD) regulation, addressed in 40 CFR 52.21. The techniques can also be used, where appropriate, for new major or minor sources or modifications subject to new source review regulations, and existing sources of air pollutants, including toxic air pollutants. This document presents a three-phase approach that is applicable to the air quality analysis:

- Phase 1. Apply a simple screening procedure (Section 4.1) to determine if either (1) the source clearly poses no air quality problem or (2) the potential for an air quality problem exists.
- Phase 2. If the simplified screening results indicate a potential threat to air quality, further analysis is warranted, and the detailed screening (basic modeling) procedures described in Sections 4.2 through 4.5 should be applied.
- Phase 3. If the detailed screening results or other factors indicate that a more refined analysis is necessary, refer to the Guideline on Air Quality Models (Revised).<sup>3</sup>

The simple screening procedure (Phase 1) is applied to determine if the source poses a potential threat to air quality. The purpose of first applying a simple screening procedure is to conserve resources by eliminating from further analysis those sources that clearly will not cause or contribute to ambient concentrations in excess of short-term air quality standards or allowable concentration increments. A relatively large degree of "conservatism" is incorporated in that screening procedure to provide reasonable assurance that maximum concentrations will not be underestimated.

If the results of the simple screening procedure indicate a potential to exceed allowable concentrations, then a detailed screening analysis is conducted (Phase 2). The Phase 2 analysis will yield a somewhat conservative first approximation (albeit less conservative than the simple screening estimate) of the source's maximum impact on air quality. If the Phase 2 analysis indicates that the new source does not pose an air quality problem, further modeling may not be necessary. However, there are situations in which analysis beyond the scope of this document (Phase 3) may be required; for example when:

1. A more accurate estimate of the concentrations is needed (e.g., if the results of the Phase 2 analysis indicate a potential air quality problem).
2. The source configuration is complex.
3. Emission rates are highly variable.
4. Pollutant dispersion is significantly affected by nearby terrain features or large bodies of water.

In most of those situations, more refined analytical techniques, such as computer-based dispersion models,<sup>3</sup> can be of considerable help in estimating air quality impact.

In all cases, particularly for applications beyond the scope of this guideline, the services of knowledgeable, well-trained air pollution meteorologists, engineers and air

quality analysts should be engaged. An air quality simulation model applied improperly can lead to serious misjudgments regarding the source impact.

## 2. SOURCE DATA

In order to estimate the impact of a stationary point or area source on air quality, certain characteristics of the source must be known. The following minimum information should generally be available:

- Pollutant emission rate;
- Stack height for a point source and release height for an area source;
- Stack gas temperature, stack inside diameter, and stack gas exit velocity (for plume rise calculations);
- Location of the point of emission with respect to surrounding topography, and the character of that topography;
- A detailed description of all structures in the vicinity of (or attached to) the stack in question. (See the discussion of aerodynamic downwash in Section 4.5.1); and
- Similar information from other significant sources in the vicinity of the subject source (or air quality data or dispersion modeling results that demonstrate the air quality impact of those sources).

At a minimum, impact estimates should be made with source characteristics representative of the design capacity (100 percent load). In addition, the impacts should be estimated based on source characteristics at loads of 50 percent and 75 percent of design capacity, and the maximum impacts selected for comparison to the applicable air quality standard. Refer to Section 9.1.2 in the Guideline on Air Quality Models (Revised)<sup>3</sup> for a further discussion of source data.

### 2.1 Emissions

The analysis of air quality impact requires that the emissions from each source be fully and accurately characterized. If the pollutants are not emitted at a constant rate (most are not), information should be obtained on how emissions vary with season, day

of the week, and hour of the day. In most cases, emission rates vary with the source production rate or rate of fuel consumption. For example, for a coal-fired power plant, emissions are related to the kilowatt-hours of electricity produced, which is proportional to the tonnage of coal used to produce the electricity. Fugitive emissions from an area source are likely to vary with wind speed and both atmospheric and ground moisture content. If pollutant emission data are not directly available, emissions can be estimated from fuel consumption or production rates by multiplying the rates by appropriate emission factors. Emission factors can be determined using three different methods. They are listed below in decreasing order of confidence:

1. Stack-test results or other emission measurements from an identical or similar source.
2. Material balance calculations based on engineering knowledge of the process.
3. Emission factors derived for similar sources or obtained from a compilation by the U.S. Environmental Protection Agency.<sup>5</sup>

In cases where emissions are reduced by control equipment, the effectiveness of the controls must be accounted for in the emissions analysis. The source operator should be able to estimate control effectiveness in reducing emissions and how this effectiveness varies with changes in plant operating conditions.

## 2.2 Merged Parameters for Multiple Stacks

Sources that emit the same pollutant from several stacks with similar parameters that are within about 100m of each other may be analyzed by treating all of the emissions as coming from a single representative stack. For each stack compute the parameter M:

$$M = \frac{h_s V T_s}{Q}, \quad (2.1)$$

where:

$M$  = merged stack parameter which accounts for the relative influence of stack height, plume rise, and emission rate on concentrations

$h_s$  = stack height (m)

$V = (\pi/4) d_s^2 v_s$  = stack gas volumetric flow rate ( $m^3/s$ )

$d_s$  = inside stack diameter (m)

$v_s$  = stack gas exit velocity (m/s)

$T_s$  = stack gas exit temperature (K)

$Q$  = pollutant emission rate (g/s)

The stack that has the lowest value of  $M$  is used as a "representative" stack. Then the sum of the emissions from all stacks is assumed to be emitted from the representative stack; i.e., the equivalent source is characterized by  $h_{s_1}$ ,  $V_1$ ,  $T_{s_1}$  and  $Q$ , where subscript 1 indicates the representative stack and  $Q = Q_1 + Q_2 + \dots + Q_n$ .

The parameters from dissimilar stacks should be merged with caution. For example, if the stacks are located more than about 100m apart, or if stack heights, volumetric flow rates, or stack gas exit temperatures differ by more than about 20 percent, the resulting estimates of concentrations due to the merged stack procedure may be unacceptably high.

### 2.3 Topographic Considerations

It is important to study the topography in the vicinity of the source being analyzed. Topographic features, through their effects on plume behavior, will sometimes be a significant factor in determining ambient ground-level pollutant concentrations. Important features to note are the locations of large bodies of water, elevated terrain, valley configurations, and general terrain roughness in the vicinity of the source.

Section 4.5.2 provides a screening technique for estimating ambient concentrations due to plume impaction at receptors located on elevated terrain features above stack height. The effects of elevated terrain below stack height can be accounted for in Sections 4.2 and 4.3. A screening technique for estimating concentrations under shoreline fumigation conditions is presented in Section 4.5.3. Any other topographic considerations, such as terrain-induced plume downwash and valley stagnation, are beyond the scope of this guideline.

#### 2.4 Source Building Complex

The downwash phenomenon caused by the aerodynamic turbulence induced by a building may result in high ground-level concentrations in the vicinity of an emission source. It is therefore important to characterize the height and width of structures nearby the source. For purposes of these analyses, "nearby" includes structures within a distance of five times the lesser of the height or width of the structure, but not greater than 0.8km (0.5 mile).<sup>6</sup> The screening procedure for building downwash is described in Section 4.5.1.

### 3. METEOROLOGICAL DATA

The computational procedures given in Section 4 for estimating the impact of a stationary source on air quality utilize information on the following meteorological parameters:

- Wind speed and direction
- Stability class
- Mixing height
- Temperature

A discussion of each of these parameters follows.

#### 3.1 Wind Speed and Direction

Wind speed and direction data are required to estimate short-term peak and long-term average concentrations. The wind speed is used to determine (1) plume dilution, and (2) the plume rise downwind of the stack. These factors, in turn, affect the magnitude of and distance to the maximum ground-level concentration.

Most wind data are collected near ground level. The wind speed at stack height,  $u_s$ , can be estimated from the following power law equation:

$$u_s = u_1 \left[ \frac{h_s}{z_1} \right]^p, \quad (3.1)$$

where:

$u_s$  = the wind speed (m/s) at stack height,  $h_s$ ,

$u_1$  = the wind speed at a reference height,  $z_1$  (such as the anemometer height), and

$p$  = the stability-related power law exponent from Table 3-1.

Table 3-1. Wind Profile Exponent as a Function of Atmospheric Stability for Rural and Urban Sites\*

Stability Class	Rural Exponent	Urban Exponent
A	0.07	0.15
B	0.07	0.15
C	0.10	0.20
D	0.15	0.25
E	0.35	0.30
F	0.55	0.30

The power law equation may be used to adjust wind speeds over a height range from about 10 to 300m. Adjustments to heights above 300m should be used with caution. For release heights below 10m the reference wind speed should be used without adjustment. For the procedures in Section 4 the reference height is assumed to be at 10m.

The wind direction is an approximation to the direction of transport of the plume. The variability of the direction of transport over a period of time is a major factor in estimating ground-level concentrations averaged over that time period.

Wind speed and direction data from National Weather Service (NWS), Air Weather Service, and Naval Weather Service stations are available from the National Climatic Data Center (NCDC), Federal Building, Asheville, NC [(704) 259-0682]. Wind data are often also recorded at existing plant sites and at air quality monitoring sites. It is important that the equipment used to record such data be properly designed, sited, and maintained to record data that are reasonably representative of the direction and speed of the plume.

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\*The classification of a site as rural or urban should be based on one of the procedures described in Section 8.2.8 of the Guideline on Air Quality Models (Revised).<sup>3</sup>

Guidance on collection of on-site meteorological data is contained primarily in Reference 7, but also in References 3 and 8.

### 3.2 Stability

Stability categories, as depicted in Tables 3-1 and 3-2, are indicators of atmospheric turbulence. The stability category at any given time will depend upon static stability (related to the change in temperature with height), thermal turbulence (caused by heating of the air at ground level), and mechanical turbulence (a function of wind speed and surface roughness). It is generally estimated by a method given by Turner,<sup>9</sup> which requires information on solar elevation angle, cloud cover, cloud ceiling height, and wind speed (see Table 3-2). Opaque cloud cover should be used if available, otherwise total cloud cover may be used. The solar elevation angle is a function of the time of year and the time of day, and is presented in charts in the Smithsonian Meteorological Tables.<sup>10</sup> The hourly NWS observations include cloud cover, ceiling height, and wind speed. These data are available from NCDC or the SCRAM BBS.\* Methods for estimating atmospheric stability categories from on-site data are presented in Reference 7. For computation of seasonal and annual concentrations, a joint frequency distribution of stability class, wind direction, and wind speed (stability wind rose) is needed. Such distributions, called STAR summaries, can be obtained from NCDC for NWS stations.

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\*Support Center for Regulatory Air Models Bulletin Board System is a component of the TTN (Technology Transfer Network) BBS maintained by OAQPS, accessible via modem by dialing (919) 541-5742.

Table 3-2. Key to Stability Categories\*

Surface Wind Speed at a Height of 10m (m/s)	Day			Night**	
	Incoming Solar Radiation (Insolation)***			Thinly Overcast or $\geq 4/8$ Low Cloud Cover	$\leq 3/8$ Cloud Cover
	Strong	Moderate	Slight		
< 2	A	A - B	B	F	F
2 - 3	A - B	B	C	E	F
3 - 5	B	B - C	C	D	E
5 - 6	C	C - D	D	D	D
> 6	C	D	D	D	D

- \* The neutral class (D) should be assumed for all overcast conditions during day or night.
- \*\* Night is defined as the period from 1 hour before sunset to 1 hour after sunrise.
- \*\*\* Appropriate insolation categories may be determined through the use of sky cover and solar elevation information as follows:

Sky Cover (Opaque or Total)	Solar Elevation Angle > 60°	Solar Elevation Angle $\leq 60^\circ$ but > 35°	Solar Elevation Angle $\leq 35^\circ$ but > 15°
4/8 or Less or Any Amount of High Thin Clouds	Strong	Moderate	Slight
5/8 to 7/8 Middle Clouds (7000 to 16,000ft base)	Moderate	Slight	Slight
5/8 to 7/8 Low Clouds (less than 7000ft base)	Slight	Slight	Slight

### 3.3 Mixing Height

The mixing height is the distance above the ground to which relatively unrestricted vertical mixing occurs in the atmosphere. When the mixing height is low (but still above plume height) ambient ground-level concentrations will be relatively high because the pollutants are prevented from dispersing upward. For estimating long-term average concentrations, it is generally adequate to use an annual-average mixing height rather than daily values.

Mixing height data are generally derived from surface temperatures and from upper air soundings which are made at selected NWS stations. The procedure used to determine mixing heights is one developed by Holzworth.<sup>11</sup> Tabulations and summaries of mixing height data can be obtained from NCDC.

For the purposes of calculations made in Section 4.2 and for use in the SCREEN2 model, a mechanically driven mixing height is estimated to provide a lower limit to the mixing height used during neutral and unstable conditions. The mechanical mixing height is calculated from:<sup>12</sup>

$$Z_m = \frac{0.3 u_*}{f}, \quad (3.2)$$

where:

$u_*$  = friction velocity (m/s)

$f$  = Coriolis parameter ( $9.374 \times 10^{-5} \text{s}^{-1}$  at  $40^\circ$  latitude)

Using a log-linear vertical profile for the wind speed, and assuming a surface roughness length of about 0.3m,  $u_*$  may be estimated from the 10m wind speed,  $u_{10}$ , as

$$u_* = 0.1 u_{10}$$

Substituting for  $u_*$  in (3.2) yields

$$z_m = 320 u_{10} \quad (3.3)$$

If the plume height is calculated to be above the mixing height determined from Equation 3.3, then the mixing height is set at 1m above the plume height for conservatism in SCREEN2.

### 3.4 Temperature

Ambient air temperature must be known in order to calculate the amount of rise of a buoyant plume. Plume rise is proportional to a fractional power of the temperature difference between the stack gases and the ambient air (see Section 4.2). Ambient temperature data are collected hourly at NWS stations, and are available from NCDC or from the SCRAM BBS. For the procedures in Section 4, a default value of 293K is used for ambient temperature if no data are available.

#### 4. ESTIMATING SOURCE IMPACT ON AIR QUALITY

A three-phase approach, as discussed in the introduction, is recommended for estimating the air quality impact of a stationary source:<sup>\*</sup>

Phase 1. Simple screening analysis

Phase 2. Detailed screening (basic modeling) analysis

Phase 3. Refined modeling analysis

The Phase 3 analysis is beyond the scope of this guideline, and the user is referred to the Guideline on Air Quality Models (Revised).<sup>3</sup> This section presents the simple screening procedure (Section 4.1) and the detailed screening procedures (Sections 4.2 through 4.5). All of the procedures, with the partial exception of the procedures in Sections 4.5.2 and 4.5.3, are based upon the bi-variate Gaussian dispersion model assumptions described in the Workbook of Atmospheric Dispersion Estimates.<sup>9</sup> A consistent set of units (meters, grams, seconds) is used throughout:

Distance (m)

Pollutant Emission Rate (g/s)

Pollutant Concentration (g/m<sup>3</sup>)

Wind Speed (m/s)

To convert pollutant concentration to micrograms per cubic meter (µg/m<sup>3</sup>) for comparison with air quality standards, multiply the value in g/m<sup>3</sup> by 1 x 10<sup>6</sup>.

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<sup>\*</sup>The techniques described in this section can be used, where appropriate, to evaluate sources subject to the prevention of significant deterioration regulations (PSD - addressed in 40 CFR 52.21), new major or minor sources subject to new source review regulations, and existing sources of air pollutants, including toxic air pollutants.

#### 4.1 Simple Screening Procedure

The simple screening procedure is the "first phase" that is recommended when assessing the air quality impact of a new point source. The purpose of this screening procedure is to eliminate from further analysis those sources that clearly will not cause or contribute to ambient concentrations in excess of short-term air quality standards.

The scope of the procedure is confined to elevated point sources with plume heights of 10 to 300m, and concentration averaging times of 1-hour to annual. The procedure is particularly useful for sources where the short-term air quality standards are "controlling"; i.e., in cases where meeting the short-term standards provides good assurance of meeting the annual standard for that pollutant. Elevated point sources (i.e., sources for which the emission points are well above ground level) are often in that category, particularly when they are isolated from other sources.

When applying the screening procedure to elevated point sources, the following assumptions must apply:

1. No aerodynamic downwash of the effluent plume by nearby buildings occurs. (Refer to Section 4.5.1 to determine if building downwash is a potential problem.)
2. The plume does not impact on elevated terrain. (Refer to Section 4.5.2 to determine if elevated terrain above stack height may be impacted.)

If the potential for building downwash exists, then SCREEN2 should be used to estimate air quality impact and the simple screening procedure is not applicable.

If the potential for plume impaction on elevated terrain exists, then the calculation procedure described in the indicated section should also be applied, and the higher concentration from the terrain impaction procedure and the simple screening procedure

should be selected to estimate the maximum ground-level concentration. The effects of elevated terrain below stack height should also be accounted for by reducing the computed plume heights by the maximum terrain height above stack base.

The screening procedure utilizes the Gaussian dispersion equation to estimate the maximum 1-hour ground-level concentration for the source in question (Computations 1-6 below). To obtain concentrations for other averaging times up to annual, multiply the 1-hour value by an appropriate factor (Computation 7). Then account for background concentrations (Computation 8) to obtain a total concentration estimate. That estimate is then used, in conjunction with any elevated terrain estimates, to determine if further analysis of the source impact is warranted (Computation 9):

**Step 1.** Estimate the **normalized plume rise** ( $u\Delta h$ ) that is applicable to the source during neutral and unstable atmospheric conditions. (Stable atmospheric conditions are not treated explicitly since this simple screening procedure does not apply to stack heights less than 10m or cases with terrain intercepts.) First, compute the buoyancy flux parameter,  $F_b$ :

$$\begin{aligned} F_b &= \frac{g}{4} v_s d_s^2 \left[ \frac{T_s - T_a}{T_s} \right] \\ &= 3.12V \left[ \frac{T_s - T_a}{T_s} \right], \end{aligned} \tag{4.1}$$

where:

$g$  = acceleration due to gravity ( $9.806 \text{ m/s}^2$ )

$v_s$  = stack gas exit velocity (m/s)\*

$d_s$  = stack inside diameter (m)

$T_s$  = stack gas exit temperature (K)\*

$T_a$  = ambient air temperature (K) (If no ambient temperature data are available, assume that  $T_a = 293\text{K}$ .)

$V = (\pi/4)d_s^2 v_s$  = actual stack gas volume flow rate ( $\text{m}^3/\text{s}$ )

Normalized plume rise ( $u\Delta h$ ) is then given by:

$$u\Delta h = 21.4F_b^{3/4} \text{ when } F_b < 55 \text{ m}^4/\text{s}^3 \quad (4.2)$$

$$u\Delta h = 38.7F_b^{3/5} \text{ when } F_b \geq 55 \text{ m}^4/\text{s}^3$$

**Step 2.** Divide the  $u\Delta h$  value obtained from Equation 4.2 by each of five wind speeds ( $u = 1.0, 2.0, 3.0, 5.0$  and  $10 \text{ m/s}$ ) to estimate the actual plume rise ( $\Delta h$ ) for each wind speed:

$$\Delta h = (u\Delta h)/u$$

**Step 3.** Compute the plume height ( $h_e$ ) that will occur during each wind speed by adding the respective plume rises to the stack height ( $h_s$ ):

$$h_e = h_s + \Delta h$$

If the effects of elevated terrain below stack height are to be accounted for, then reduce each plume height by the maximum terrain height above stack base.

---

\*If stack gas temperature or exit velocity data are unavailable, they may be approximated from guidelines that yield typical values for those parameters for existing sources.<sup>13</sup>

**Step 4.** For each plume height computed in (3), estimate a  $\chi u/Q$  value from Figure 4-1.<sup>14</sup>

**Step 5.** Divide each  $\chi u/Q$  value by the respective wind speed to determine the corresponding  $\chi/Q$  values:

$$\frac{\chi}{Q} = \frac{\chi u/Q}{u}$$

**Step 6.** Multiply the maximum  $\chi u/Q$  value obtained in (5) by the emission rate  $Q$  (g/s), and incorporate a factor of 2 margin of safety, to obtain the maximum 1-hour ground-level concentration  $\chi_1$  (g/m<sup>3</sup>) due to emissions from the stack in question:

$$\chi_1 = 2Q \left[ \frac{\chi}{Q} \right]$$

The margin of safety is incorporated in the screening procedure to account for the potential inaccuracy of concentration estimates obtained through calculations of this type.

If more than one stack is being considered, and the procedure for merging parameters for multiple stacks is not applicable (Section 2.2), (1) through (6) must be applied for each stack separately. The maximum values ( $\chi_1$ ) found for each stack are then added together to estimate the **total** maximum 1-hour concentration.

**Step 7.** To obtain a concentration estimate ( $\chi_p$ ) for an averaging time greater than one hour, multiply the 1-hour value by an appropriate factor,  $r$ .\*

$$\chi_p = r \chi_1$$

---

\*See the discussion in Step 5 of Section 4.2 which addresses multiplication factors for averaging times longer than 1-hour.

**Step 8.** Next, contributions from other sources ( $\chi_B$ ) should be taken into account, yielding the final screening procedure concentration estimate  $\chi_{max}$  ( $g/m^3$ ):

$$\chi_{max} = \chi_p + \chi_B.$$

Procedures on estimating concentrations due to other sources are provided in Section 4.5.5.

**Step 9.** Based on the estimate of  $\chi_{max}$  and (if applicable) estimate of concentrations due to terrain impaction problems, determine if further analysis of the source is warranted. If any of the estimated concentrations exceeds the air quality level of concern (e.g., an air quality standard), proceed to Section 4.2 for further analysis. If the concentrations are below the level of concern, the source can be safely assumed to pose no threat to that air quality level, and no further analysis is necessary.

#### 4.2 Estimating Maximum Short-Term Concentrations

The basic modeling procedures described in the remainder of this document comprise the recommended "second phase" (or detailed screening) that may be used in assessing air quality impacts. The procedures are intended for application in those cases where the simple screening procedure (first phase) indicates a potential air quality problem. As with the first phase (simple screening) analysis in Section 4.1, if elevated terrain above stack height occurs within 50km of the source, then the procedure in Section 4.5.2 should be applied in addition to the procedures in this section. The highest concentration from all applicable procedures should then be selected to estimate the maximum ground-level concentration. Even if the plume is not likely to impact on elevated terrain, the user should account for the effects of elevated terrain below stack height. If the terrain is relatively uniform around the source, then a procedure to account

for terrain effects is to reduce the computed plume height,  $h_c$  (for all stabilities), by the maximum terrain elevation above stack base within a 50km radius from the source. The adjusted plume height can then be used in conjunction with the "flat terrain" procedures described in this section.

If there are only a few isolated terrain features in otherwise flat terrain, then the flat terrain estimates from this section should be expanded to include the procedures of Section 4.3 applied to the locations with elevated terrain. For the additional calculations the computed plume height,  $h_c$  should be reduced by the terrain height above stack base corresponding to the specific terrain features. The procedures in this section can be applied without the aid of a computer (a pocket or desk calculator will suffice). However, they are subject to the same limitations as the simple screening procedure, i.e., no building downwash occurs (see Section 4.5.1), no terrain impaction occurs (Section 4.5.2), and plume heights do not exceed 300m. An alternative approach is to use the SCREEN2 computer code that has been made available by EPA for use on an IBM® - PC compatible microcomputer with at least 256K of RAM. The SCREEN2 code replaces the PTPLU, PTMAX, and PTDIS codes previously used in conjunction with Volume 10R<sup>2</sup> and the original SCREEN model. It is applicable to all of the procedures contained in this section and Section 4.3, but also includes calculations for the special cases of building downwash, fumigation, elevated terrain, area sources and long range transport described in Section 4.5. Complete documentation on the use of these procedures is provided in the SCREEN2 Model User's Guide.

This section (4.2) presents the basic procedures for estimating maximum short-term concentrations for specific meteorological situations. If building downwash occurs (see Section 4.5.1), then SCREEN2 must be used in lieu of these procedures. In Steps 1-3,

plume rise<sup>15,16,17</sup> and a critical wind speed are computed. In Step 4, maximum 1-hour concentrations are estimated. In Step 5, the 1-hour concentrations are used to estimate concentrations for averaging times up to 1 year. Contributions from other sources are accounted for in Step 6.

**Step 1.** Estimate the normalized plume rise ( $u\Delta h$ ) that is applicable to the source during neutral and unstable atmospheric conditions. First, compute the buoyancy flux term,  $F_b$ , using Equation 4.1 (repeated here for convenience):

$$F_b = \frac{g}{4} v_s d_s^2 \left[ \frac{T_s - T_a}{T_s} \right] = 3.12V \left[ \frac{T_s - T_a}{T_s} \right] \quad (4.1),$$

where:

$g$  = acceleration due to gravity (9.806 m/s<sup>2</sup>)

$v_s$  = stack gas exit velocity (m/s)\*

$d_s$  = stack inside diameter (m)

$T_s$  = stack gas exit temperature (K)\*

$T_a$  = ambient air temperature (K) (If no ambient temperature data are available, assume that  $T_a = 293K$ .)

$V = (\pi/4)d_s^2 v_s$  = actual stack gas volume flow rate (m<sup>3</sup>/s)

Normalized plume rise ( $u\Delta h$ ) is then given by:

$$\begin{aligned} u\Delta h &= 21.4F_b^{3/4} \text{ when } F_b < 55 \text{ m}^4/\text{s}^3 \\ u\Delta h &= 38.7F_b^{3/5} \text{ when } F_b \geq 55 \text{ m}^4/\text{s}^3 \end{aligned} \quad (4.2)$$

If the emissions are from a flare, then the normalized plume rise and an effective release height may be determined with the following procedure:

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\*If stack gas temperature or exit velocity data are unavailable, they may be approximated from guidelines that yield typical values for those parameters for existing sources.<sup>13</sup>

(a) Calculate the total heat release rate,  $H$  (cal/s), of the flared gas based on the heat content and the gas consumption rate.

(b) Calculate the buoyancy flux term,  $F_b$ , for the flare:\*

$$F_b = 1.66 \times 10^{-5} \times H \quad (4.3)$$

(c) Calculate the normalized plume rise ( $u\Delta h$ ) from Equation 4.2.

(d) Calculate the vertical height of the flame,  $h_f$  (m), assuming the flame is tilted  $45^\circ$  from the vertical:<sup>19</sup>

$$h_f = 4.56 \times 10^{-3} \times H^{0.478} \quad (4.4)$$

(e) Calculate an effective release height for the tip of the flame:

$$h_{se} = h_s + h_f.$$

Use  $h_{se}$  in place of  $h_s$  along with the value of  $u\Delta h$  calculated from (c) in determining plume heights in the following procedures.

**Step 2.** Estimate the critical wind speed ( $u_c$ ) applicable to the source during neutral and near-neutral atmospheric conditions. The critical wind speed is a function of two opposing effects that occur with increasing wind speed; namely, increased dilution of the effluent as it leaves the stack (which tends to decrease the maximum impact on ground-level concentration) and suppression of plume rise (tending to increase the impact). The wind speed at which the interaction of those opposing effects results in the highest ground-level concentration is the critical wind speed.

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\*This formula was derived from:  $F_b = \frac{gQ_H}{\pi\rho c_p T_a}$  (Eqn. 4.20, Briggs<sup>15</sup>), assuming  $T_a = 293\text{K}$ ,  $\rho = 1205 \text{ g/m}^3$ , and  $c_p = 0.24 \text{ cal/gK}$ , and that the sensible heat release rate,  $Q_H = (0.45)H$ .<sup>18</sup>

The critical wind speed can be estimated through the following approximation:

$$u_c = \frac{u\Delta h}{h_s} \quad (4.5)$$

Assume that the value of  $u_c$  from Equation 4.5 corresponds to the stack height wind speed. If the value of  $u_c$  calculated from Equation 4.5 is less than 1.0 m/s, then use  $u_c = 1.0$  m/s. If the value of  $u_c$  calculated from Equation 4.5 is greater than 15.0 m/s, then use  $u_c = 15.0$  m/s.

**Step 3.** Stable atmospheric conditions may be critical if the emission height is less than 50m. The stable case plume rise ( $\Delta h$ ) should be estimated as follows:

$$\Delta h = 2.6 \left[ \frac{F_b T_a}{u g \Delta \theta / \Delta z} \right]^{1/3} \quad (4.6)$$

The value  $\Delta \theta / \Delta z$  is the change in potential temperature with height. A value of 0.035 K/m for F stability should be used for both urban and rural sites. The classification criteria of a site as rural or urban should be based on one of the procedures described in Section 8.2.8 of the Guideline on Air Quality Models (Revised).<sup>3</sup>

**Step 4.** Estimate maximum 1-hour concentrations that will occur during various dispersion situations. First, using Table 4-1 as a guide, determine the dispersion situations and corresponding calculation procedures applicable to the source being considered. Then apply the applicable calculation procedures, which are described on the following pages, in order to estimate maximum 1-hour concentrations. Then proceed to Step 5.

As discussed earlier and as noted in Table 4-1, the hand calculation procedures presented in this step are limited by certain assumptions, namely that no building downwash occurs (Section 4.5.1), no terrain impaction occurs (Section 4.5.2), and that

Table 4-1. Calculation Procedures to Use with Various Release Heights

Height of Release Above Terrain, h	Applicable Calculation Procedures
$h \geq 50\text{m}$	(a) Unstable / Limited Mixing (b) Near-neutral / High Wind
$10 \leq h < 50\text{m}$	(a) Unstable / Limited Mixing (b) Near-neutral / High Wind (c) Stable
$h < 10\text{m}$ and Ground Level Sources	(b) Near-neutral / High Wind (c) Stable

**NOTE:**\*

If  $h_s < h_b + 1.5L_b$ , refer to Section 4.5.1 on building downwash and use SCREEN2.

If elevated terrain above stack height occurs within 50km, refer to Section 4.5.2.

If fumigation is potentially a problem (e.g., for rural sources with  $h_s \geq 10\text{m}$ ), refer to Section 4.5.3.

If the plume height,  $h_e = h_s + (u\Delta h/u_s)$  is greater than 300m, then the procedures in this section are not applicable (i.e., SCREEN2 may be used without this restriction).

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\* $h = h_s - h_t$

$h_s$  = physical stack height

$h_t$  = terrain height above stack base

$h_b$  = height of nearby structure

$L_b$  = lesser of height or maximum projected width of nearby structure

plume heights are below 300m. For cases involving building downwash or plume heights above 300m, SCREEN2 should be used. Documentation for these procedures is provided in SCREEN2 Model User's Guide.

**Procedure (a): Unstable/Limited Mixing**

During very unstable conditions, the plume from a stack will be mixed to ground level relatively close to the source, resulting in high short-term concentrations. These concentrations can be significantly increased when the unstable conditions occur in conjunction with a limited mixing condition. Limited mixing (also called plume trapping) occurs when a stable layer aloft limits the vertical mixing of the plume. The highest concentrations occur when the mixing height is at or slightly above the plume height.

Calculation Procedure:

1. Compute the plume height,  $h_e$ , that will occur during A stability and 10m wind speeds of 1 and 3 m/s. Adjust the wind speeds from 10m to stack height using Equation 3.1 and the exponent for stability class A. Use the  $u\Delta h$  value computed in Step 1.

$$\begin{aligned} h_e &= h_s + \frac{u\Delta h}{u_s} \\ &= h_s + \Delta h \end{aligned}$$

If  $v_s < 1.5u_s$ , account for stack tip downwash as follows:

$$h_e = h_s + \Delta h + 2\left[\frac{v_s}{u_s} - 1.5\right]d_s \quad (4.7)$$

If elevated terrain is to be accounted for, then reduce the computed plume height for each wind speed by the maximum terrain elevation above stack base.

2. For both wind speeds considered in (1), determine the maximum 1-hour  $\chi u/Q$  using the curve for stability A on Figure 4-2 (rural)<sup>9</sup> or A-B on Figure 4-3 (urban).<sup>20</sup>

3. Compute the maximum 1-hour concentration,  $\chi_1$ , for both cases using:

$$\chi_1 = mQ \frac{\chi u/Q}{u_s}, \quad (4.8)$$

where  $m$  is a conservative factor to account for the increase in concentration expected due to reflections of the plume off the top of the mixed layer. The value of  $m$  depends on the plume height as follows:<sup>\*</sup>

- $m = 2.0$  for  $290\text{m} \leq h_e$
- $m = 1.8$  for  $270\text{m} \leq h_e < 290\text{m}$
- $m = 1.5$  for  $210\text{m} \leq h_e < 270\text{m}$
- $m = 1.2$  for  $180\text{m} \leq h_e < 210\text{m}$
- $m = 1.1$  for  $160\text{m} \leq h_e < 180\text{m}$
- $m = 1.0$  for  $h_e < 160\text{m}$

Select the highest concentration computed.

#### **Procedure (b): Near-neutral/High Wind**

Some buoyant plumes will have their greatest impact on ground-level concentrations during neutral or near-neutral conditions, often in conjunction with high wind speeds.

Calculation procedure:

1. Compute the plume height,  $h_e$ , that will occur during C stability with a stack height wind speed of  $u_s = u_c$ , the value of the critical wind speed computed in Step 2. If  $u_c < 10$  m/s, then also compute the plume height that will occur during C stability with

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<sup>\*</sup>The values of  $m$  are based on an assumed minimum daytime mixing height of about 320m (see Section 3.3).

a 10m wind speed of 10 m/s. Adjust the 10 m/s wind speed from 10m to stack height using Equation 3.1 and the exponent for stability class C. Use the  $u\Delta h$  value computed in Step 1:

$$h_e = h_s + \frac{u\Delta h}{u_s}$$

If  $v_s < 1.5u_s$ , account for stack tip downwash using Equation 4.7. If elevated terrain is to be accounted for, then reduce the computed plume height for each wind speed by the maximum terrain elevation above stack base.

2. For the wind speed(s) considered in (1), determine the maximum 1-hour  $\chi u/Q$  using the curve for stability C on Figure 4-2 (rural)<sup>9</sup> or Figure 4.3 (urban).<sup>20</sup>

3. Compute the maximum 1-hour concentration  $\chi_1$  for each case using:

$$\chi_1 = Q \frac{\chi u/Q}{u_s}$$

and select the highest concentration computed.

### Procedure (c): Stable

Low-level sources (i.e., sources with stack heights less than about 50m) sometimes produce the highest concentrations during stable atmospheric conditions. Under such conditions, the plume's vertical spread is severely restricted and horizontal spreading is also reduced. This results in what is called a fanning plume.

Calculation procedures:

A. For low-level sources with some plume rise, calculate the concentration as follows:

1. Compute the plume height ( $h_e$ ) that will occur during F stability (for rural cases) and 10m wind speeds of 1, 3, and 4 m/s,\* or E stability (for urban cases) and 10m wind speeds of 1, 3, and 5 m/s. Adjust the wind speeds from 10m to stack height, using Equation 3.1 and the appropriate exponent. Use the stable plume rise ( $\Delta h$ ) computed from Equation 4.6 in Step 3:

$$h_e = h_s + \Delta h$$

If  $v_s < 1.5u_s$ , account for stack tip downwash using Equation 4.7. If elevated terrain is to be accounted for, then reduce the computed plume height for each wind speed by the maximum terrain elevation above stack base.

2. For each wind speed and stability considered in (1), find the maximum 1-hour  $\chi u/Q$  from Figure 4-2 (rural)<sup>9</sup> or 4-3 (urban).<sup>20</sup> Compute the maximum 1-hour concentration for each case, using

$$\chi_1 = Q \frac{\chi u/Q}{u_s}$$

and select the highest concentration computed.

B. For low-level sources with no plume rise ( $h_e = h_s$ ), find the maximum 1-hour  $\chi u/Q$  from Figure 4-2 (rural case - assume F stability) or 4-3 (urban case - assume E stability). Compute the maximum 1-hour concentration, assuming a 10m wind speed of 1 m/s. Adjust the wind speed from 10m to stack height using Equation 3.1 and the appropriate exponent.

$$\chi_1 = Q \frac{\chi u/Q}{u_s}$$

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\*Refer to the discussion on worst case meteorological conditions in the SCREEN2 User's Guide for an explanation of the use of F stability with a 4 m/s wind speed.

**Step 5.** Obtain concentration estimates for the averaging times of concern. The maximum 1-hour concentration ( $\chi_1$ ) is the highest of the concentrations estimated in Step 4, Procedures (a) - (c). For averaging times greater than 1-hour, the maximum concentration will generally be less than the 1-hour value. The following discussion describes how the maximum 1-hour value may be used to make an estimate of maximum concentrations for longer averaging times.

The ratio between a longer-term maximum concentration and a 1-hour maximum will depend upon the duration of the longer averaging time, source characteristics, local climatology and topography, and the meteorological conditions associated with the 1-hour maximum. Because of the many ways in which such factors interact, it is not practical to categorize all situations that will typically result in any specified ratio between the longer-term and 1-hour maxima. Therefore, ratios are presented here for a "general case" and the user is given some flexibility to adjust those ratios to represent more closely any particular point source application where actual meteorological data are used. To obtain the estimated maximum concentration for a 3-, 8-, 24-hour or annual averaging time, multiply the 1-hour maximum ( $\chi_1$ ) by the indicated factor:

<u>Averaging Time</u>	<u>Multiplying Factor</u>
3 hours	0.9 (±0.1)
8 hours	0.7 (±0.2)
24 hours	0.4 (±0.2)
Annual	0.08 (±0.02)

The numbers in parentheses are recommended limits to which one may diverge from the multiplying factors representing the general case. For example, if aerodynamic downwash or terrain is a problem at the facility, or if the

emission height is very low, it may be necessary to increase the factors (within the limits specified in parentheses). On the other hand, if the stack is relatively tall and there are no terrain or downwash problems, it may be appropriate to decrease the factors. Agreement should be reached with the Regional Office prior to modifying the factors.

The multiplying factors listed above are based upon general experience with elevated point sources. The factors are only intended as a rough guide for estimating maximum concentrations for averaging times greater than one hour. A degree of conservatism is incorporated in the factors to provide reasonable assurance that maximum concentrations for 3-, 8-, 24-hour and annual values will not be underestimated.

**Step 6.** Add the expected contribution from other sources to the concentration estimated in Step 5. Concentrations due to other sources can be estimated from measured data, or by computing the effect of existing sources on air quality in the area being studied. Procedures for estimating such concentrations are given in Section 4.5.5. At this point in the analysis, a first approximation of maximum short-term ambient concentrations (source impact plus contributions from other sources) has been obtained. If concentrations at specified locations, long-term concentrations, or other special topics must be addressed, refer to applicable portions of Sections 4.3 to 4.5.

#### 4.3 Short-Term Concentrations at Specified Locations

In Section 4.2, maximum concentrations are generally estimated without specific attention to the location(s) of the receptor(s). In some cases, however, it is particularly important to estimate the impact of a source on air quality in specified (e.g., critical) areas. For example, there may be nearby locations at which high pollutant concentrations already occur due to other sources, and where a relatively small addition to ambient

concentrations might cause ambient standards to be exceeded. Another example would be where an isolated terrain feature occurs in otherwise flat terrain, and concentrations at the elevated terrain location may exceed those estimated for flat terrain. These procedures assume that no building downwash occurs (Section 4.5.1), no terrain impaction occurs (Section 4.5.2), and that plume heights do not exceed 300m.

Each of the sources affecting a given location can be expected to produce its greatest impact during certain meteorological conditions. The composite maximum concentration at that location due to the interaction of all the sources may occur under different meteorological conditions than those which produce the highest impact from any one source. Thus, the analysis of this problem can be difficult, and may require substantial use of high-speed computers. Despite the potential complexity of the problem, some preliminary calculations can be made that will at least indicate whether or not a more detailed study is needed. For example, if the preliminary analysis indicates that the estimated concentrations are near or above the air quality standards of concern, a more detailed analysis will probably be required.

Calculation procedure:\*

**Step 1.** Compute the normalized plume rise ( $u\Delta h$ ) for neutral and unstable conditions, utilizing the procedure described in Step 1 of Section 4.2.

**Step 2.** Compute the plume rise,  $\Delta h$ , that will occur during C stability (to represent neutral and unstable conditions) with 10m wind speeds of 1, 3, 5, 10, and 20 m/s. Adjust

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\*If SCREEN2 is used, refer to the discrete distance option described in the SCREEN2 Model User's Guide.

the wind speeds from 10m to stack height using Equation 3.1 and the exponent for stability class C.

$$\Delta h = \frac{u\Delta h}{u_s}$$

**Step 3.** Compute the plume height ( $h_p$ ) that will occur during each wind speed by adding the respective plume rises to the stack height ( $h_s$ ):

$$h_e = h_s + \Delta h$$

If  $v_s < 1.5 u_s$ , account for stack tip downwash using Equation 4.7. If elevated terrain is to be accounted for, then reduce the computed plume height for each wind speed by the terrain elevation above stack base for the specified location.

**Step 4.** For each stability class-wind speed combination listed below, at the downwind distance of the "specified location," determine the  $\chi u/Q$  value from Figures 4-4 through 4-7 (rural) or Figures 4-10 through 4-12 (urban) for non-stable conditions. Note that in those figures (see the captions) very restrictive mixing heights are assumed, resulting in trapping of the entire plume within a shallow layer.

<u>Stability Class</u>	<u>10m Wind Speed (m/s)</u>
A	1, 3
B	1, 3, 5
C	1, 3, 5, 10
D	1, 3, 5, 10, 20

**Step 5.** (If the physical stack height is greater than 50m and flat terrain is being assumed, Steps 5 and 6 may be skipped.) Compute plume heights ( $h_p$ ) that will occur for stability class E and 10m wind speeds of 1, 3, and 5 m/s, and for stability class F (rural

sources only) and 10m wind speeds of 1 and 3 and 4 m/s.\* Adjust the wind speeds from 10m to stack height using Equation 3.1 and the appropriate exponent. Use the stable plume rise ( $\Delta h$ ) computed from Equation 4.6 in Step 3 of Section 4.2:

$$h_e = h_s + \Delta h.$$

If  $v_s < 1.5u_s$ , account for stack tip downwash using Equation 4.7. If elevated terrain is to be accounted for, then reduce the computed plume height for each case by the terrain elevation above stack base for the specified location.

**Step 6.** For each stability class-wind speed combination considered in Step 5, at the downwind distance of the specified location, determine a  $\chi u/Q$  value from Figures 4-8 and 4-9 (or Figure 4-13 for the urban case).

**Step 7.** For each  $\chi u/Q$  value obtained in Step 4 (and Step 6 if applicable), compute  $\chi/Q$ :

$$\frac{\chi}{Q} = \frac{\chi u/Q}{u_s}$$

**Step 8.** Select the largest  $\chi/Q$  and multiply by the source emission rate (g/s) to obtain a 1-hour concentration value ( $\text{g}/\text{m}^3$ ):

$$\chi_1 = Q \left( \frac{\chi}{Q} \right)_{\max}$$

**Step 9.** To estimate concentrations for averaging time greater than 1-hour, refer to the averaging time procedure described earlier (Step 5 of Section 4.2). To account for contributions from other sources, see Section 4.5.5.

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\*Refer to the discussion on worst case meteorological conditions in the SCREEN2 Model User's Guide for an explanation of the use of F stability with a 4m/s wind speed.

#### 4.4 Annual Average Concentrations

This section presents procedures for estimating annual average ambient concentrations caused by a single point source. The procedure for estimating the annual concentration at a specified location is presented first, followed by a suggestion of how that procedure can be expanded to estimate the overall maximum annual concentration (regardless of location). The procedures assume that the emissions are continuous and at a constant rate. The data required are emission rate, stack height, stack gas volume flow rate (or diameter and exit velocity), stack gas temperature, average afternoon mixing height, and a representative stability wind rose.\* Refer to Sections 2 and 3 for a discussion of such data.

##### 4.4.1 Annual Average Concentration at a Specified Location

Calculation procedure:

**Step 1.** (Applicable to stability categories A through D). Using the procedure described in Step 1 of Section 4.2 (Equations 4.1 and 4.2) obtain a normalized plume rise value,  $u\Delta h$ .

**Step 2.** (Applicable to stability categories E and F). Use Equation 4.6 from Step 3 of Section 4.2 to estimate the plume rise ( $\Delta h$ ) as a function of wind speed for both stable categories (E and F) using values of  $\Delta\theta/\Delta z = 0.02$  K/m for category E and  $\Delta\theta/\Delta z = 0.035$  K/m for category F.

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\*The stability wind rose is a joint frequency distribution of wind speed, wind direction and atmospheric stability for a given locality. Stability wind roses for many locations are available from the National Climatic Data Center, Asheville, North Carolina.

**Step 3.** Compute plume rise ( $\Delta h$ ) for each stability-wind speed category in Table 4-2 by (1) substituting the corresponding wind speed for  $u$  in the appropriate equations referenced in Step 1 or 2 above and (2) solving the equation for  $\Delta h$ . The wind speeds listed in Table 4-2 are derived from the wind speed intervals used by NCDC (Table 4-3) in specifying stability-wind roses. The wind speeds may be adjusted from 10m to stack height using Equation 3.1.

**Step 4.** Compute plume height ( $h_e$ ) for each stability-wind speed category in Table 4-2 by adding the physical stack height ( $h_s$ ) to each of the plume rise values computed in Step 3:

$$h_e = h_s + \Delta h$$

**Step 5.** Estimate the contribution to the annual average concentration at the specified location for each of the stability-wind speed categories in Table 4-2. First, determine the vertical dispersion coefficient ( $\sigma_z$ ) for each stability class for the downwind distance ( $x$ ) between the source and the specified location, using Figure 4-14. (**Note:** For **urban F** stability cases, use the  $\sigma_z$  for stability E.) Next, determine the mixing height ( $z_i$ ) applicable to each stability class. For stabilities A to D, use the average afternoon mixing height for the area (Figure 4-15). For **urban** stability E use the average morning mixing height (Figure 4-16). For **rural** stabilities E and F, mixing height is not applicable. Then, use that information as follows: for all stability-wind conditions when the plume height ( $h_e$ ) is greater than the mixing height ( $z_i$ ), assume a zero contribution to the annual concentration at the specified location. For each condition when  $\sigma_z \leq 0.8z_i$  and for all **rural** stability E and F cases, apply the following equation<sup>9</sup> to estimate the contribution  $C$  ( $\text{g}/\text{m}^3$ ):

Table 4-2. Stability-Wind Speed Combinations That Are Considered in Estimating Annual Average Concentrations

Atmospheric Stability Categories	Wind Speed (m/s)					
	1.5	2.5	4.5	7	9.5	12.5
A	*	*				
B	*	*	*			
C	*	*	*	*	*	
D	*	*	*	*	*	*
E	*	*	*			
F	*	*				

\* It is only necessary to consider the stability-wind speed conditions marked with an asterisk.

Table 4-3. Wind Speed Intervals Used by the National Climatic Data Center (NCDC) for Joint Frequency Distributions of Wind Speed, Wind Direction and Stability

Class	Speed Interval		Representative Wind Speed (m/s)
	m/s	knots	
1	0 to 1.8	0 to 3	1.5
2	1.8 to 3.3	4 to 6	2.5
3	3.3 to 5.4	7 to 10	4.5
4	5.4 to 8.5	11 to 16	7.0
5	8.5 to 11.0	17 to 21	9.5
6	> 11.0	> 21	12.5

$$C = \left[ \frac{2.032 Q f}{\sigma_z u x} \right] \exp \left[ -\frac{1}{2} \left( \frac{h_e}{\sigma_z} \right)^2 \right] \quad (4.9)$$

For each condition during which  $\sigma_z > 0.8z_i$ , the following equation<sup>9</sup> is applied:

$$C = \frac{2.55 Q f}{z_i u x} \quad (4.10)$$

In equations 4.9 and 4.10:

Q = pollutant emission rate (g/s)

u = wind speed (m/s)

f = frequency of occurrence of the particular wind speed-stability combination (obtained from the stability-wind rose (STAR) summary available from NCDC) for the wind direction of concern. Only consider the wind speed-stability combinations for the wind direction that will bring the plume closest to the specified location.

**Step 6.** Sum the contributions (C) computed in Step 5 to estimate the annual average concentration at the specified location.

#### 4.4.2 Maximum Annual Average Concentration

To estimate the overall maximum annual average concentration (the maximum concentration regardless of location) follow the procedure for the annual average concentration at a specified location, repeating the procedure for each of several receptor distances, and for all directions. Because of the large number of calculations required, it is recommended that a computer model such as ISCLT2 be used.<sup>21</sup>

## 4.5 Special Topics

### 4.5.1 Building Downwash

In some cases, the aerodynamic turbulence induced by a nearby building will cause a pollutant emitted from an elevated source to be mixed rapidly toward the ground (downwash), resulting in higher ground-level concentration immediately to the lee of the building than would otherwise occur. Thus, when assessing the impact of a source on air quality, the possibility of downwash problems should be investigated. For purposes of these analyses, "nearby" includes structures within a distance of five times the lesser of the height or width of the structure, but not greater than 0.8km (0.5 mile).<sup>6</sup> If downwash is found to be a potential problem, its effect on air quality should be estimated. Also when Good Engineering Practice (GEP) analysis indicates that a stack is less than the GEP height, the following screening procedures should be applied to assess the potential air quality impact. The best approach to determine if downwash will be a problem at a proposed facility is to conduct observations of effluent behavior at a similar facility. If this is not feasible, and if the facility has a simple configuration (e.g., a stack adjacent or attached to a single rectangular building), a simple rule-of-thumb<sup>22</sup> may be applied to determine the stack height ( $h_s$ ) necessary to avoid downwash problems:

$$h_s \geq h_b + 1.5 L_b , \quad (4.11)$$

where  $h_b$  is building height and  $L_b$  is the lesser of either building height or maximum projected building width. In other words, if the stack height is equal to or greater than  $h_b + 1.5 L_b$ , downwash is unlikely to be a problem.

If there is more than one stack at a given facility, the above rule must be successively applied to each stack. If more than one building is involved the rule must be successively applied to each building. Tiered structures and groups of structures should

be treated according to Reference 6. For relatively complex source configurations the rule may not be applicable, particularly when the building shapes are much different from the simple rectangular building for which the above equation was derived. For these cases, refined modeling techniques<sup>3</sup> or a wind tunnel study is recommended.

If it is determined that the potential for downwash exists, then SCREEN2 should be used to estimate the maximum ground-level pollutant concentrations that occur as a result of the downwash. The building downwash screening procedure is divided into the following two major areas of concern:

- A. Cavity Region, and
- B. Wake Region

Generally, downwash has its greatest impact when the effluent is caught in the cavity region. However, the cavity may not extend beyond the plant boundary and, in some instances, impacts in the wake region may exceed impacts in the cavity region. Therefore, impacts in both regions must be considered if downwash is potentially a problem.

When SCREEN2 is run for building downwash calculations, the program prompts the user for the building height, the minimum horizontal building dimension, and the maximum horizontal building dimension.

A. Cavity Region

The cavity calculations are made using methods described by Hosker.<sup>23</sup> Cavity calculations are based on the determination of a critical (i.e., minimum) wind speed required to cause entrainment of the plume in the cavity (defined as being when the plume centerline height equals the cavity height). Two cavity calculations are made, the first using the minimum horizontal dimension alongwind, and the second using the maximum horizontal dimension alongwind. The SCREEN2 output provides the cavity concentration,

cavity length (measured from the lee side of the building), cavity height and critical wind speed for each orientation. The highest concentration value that potentially affects ambient air should be used as the maximum 1-hour cavity concentration for the source. A more detailed description of the cavity effects screening procedure is contained in the SCREEN2 Model User's Guide. For situations significantly different from the worst case, and for complex source configurations, a more detailed analysis is required.<sup>24,25</sup> If this estimate proves unacceptable, one may also wish to consider a field study or fluid modeling demonstration to show maintenance of the NAAQS (National Ambient Air Quality Standard) or PSD increments within the cavity. If such options are pursued, prior agreement on the study plan and methodology should be reached with the Regional Office.

#### B. Wake Region

Wake effects screening can also be performed with SCREEN2. SCREEN2 uses the downwash procedures contained in the User's Guide for the Industrial Source Complex (ISC2) Dispersion Models<sup>21</sup> and applies them to the full range of meteorological conditions described in the SCREEN2 Model User's Guide. SCREEN2 accounts for downwash effects within the "near" wake region (out to ten times the lesser of the building height or projected building width,  $10L_b$ ), and also accounts for the effects of enhanced dispersion of the plume within the "far" wake region (beyond  $10L_b$ ). The same building dimensions as described above for the cavity calculations are used, and SCREEN2 calculates the maximum projected width from the values input for the minimum and maximum horizontal dimensions. The wake effects procedures are described in more detail in the ISC2 manual.

#### 4.5.2 Plume Impaction on Elevated Terrain

There is growing acceptance of the hypothesis that greater concentrations can occur on elevated than on flat terrain in the vicinity of an elevated source.\* That is particularly true when the terrain extends well above the effective plume height. A procedure is presented here to (1) determine whether or not an elevated plume may impact on elevated terrain and, (2) estimate the maximum 24-hour concentration if terrain impaction is likely. The procedure is based largely upon the 24-hour mode of the EPA Valley Model.<sup>26</sup> A similar procedure that accounts for terrain heights above plume height using the Valley Model, and compares results from the Valley Model to simple terrain calculations for terrain between stack height and plume height, is included in the SCREEN2 program. A concentration estimate obtained through the procedure in this section will likely be somewhat greater than provided by the Valley Model or by the SCREEN2 program, primarily due to the relatively conservative plume height that is used in Step 1:

Step 1. Determine if the plume is likely to impact on elevated terrain in the vicinity of the source:

(1) Compute one-half the plume rise that can be expected during F stability and a stack height wind speed ( $u_s$ ) of 2.5 m/s. (The reason for using only one-half the normally computed plume rise is to provide a margin of safety in determining both if the plume may intercept terrain and the resulting ground-level concentration. This assumption is necessary because actual plume heights will be lower with higher stack height wind speeds, and because impacts on intervening terrain above stack height but below the full plume height might otherwise be missed.)

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\*An exception may be certain flat terrain situations where building downwash is a problem (See Section 4.5.1).

$$\Delta h = \frac{2.6 \left[ \frac{F_b T_a}{u_g \Delta \theta / \Delta z} \right]^{1/3}}{2} \quad (4.12)$$

Refer to Steps 1 and 3 of Section 4.2 for a definition of terms.

(2) Compute a conservative plume height ( $h_c$ ) by adding the physical stack height ( $h_s$ ) to  $\Delta h$ :

$$h_c = h_s + \Delta h$$

(3) Determine if any terrain features in the vicinity of the source are as high as  $h_c$ . If so, proceed with Step 2. If that is not the case, the plume is not likely to intercept terrain, and Step 2 is not applicable.\*

**Step 2.** Estimate the maximum 24-hour ground-level concentration on elevated terrain in the vicinity of the source:

(1) Using a topographic map, determine the distance from the source to the nearest ground-level location at the height  $h_c$ .

(2) Using Figure 4-17 and the distance determined in (1), estimate a 24-hour  $\chi/Q$  value.

(3) Multiply the  $(\chi/Q)_{24}$  value by the emission rate  $Q$  (g/s) to estimate the maximum 24-hour concentration,  $\chi_{24}$ , due to plume impaction on elevated terrain:

$$\chi_{24} = Q \left[ \frac{\chi}{Q} \right]_{24}$$

---

\*Even if the plume is not likely to impact on elevated terrain (and for all concentration averaging times of concern) the user should account for the effects of elevated terrain on maximum concentrations. A procedure to account for elevated terrain below stack height is described in Section 4.2 and consists of reducing the computed plume height,  $h_c$  (for all stabilities), by the elevation difference between stack base and location of the receptor(s) in question. The adjusted plume heights can then be used in conjunction with the "flat-terrain" modeling procedures described earlier.

### 4.5.3 Fumigation

Fumigation occurs when a plume that was originally emitted into a stable layer is mixed rapidly to ground-level when unstable air below the plume reaches plume level. Fumigation can cause very high ground-level concentrations.<sup>27</sup> Typical situations in which fumigation occurs are:

1. Breaking up of the nocturnal radiation inversion by solar warming of the ground surface;
2. Shoreline fumigation caused by advection of pollutants from a stable marine environment to an unstable inland environment; and
3. Advection of pollutants from a stable rural environment to a turbulent urban environment.

The following procedure can be used for estimating concentrations due to inversion break-up and shoreline fumigation in rural areas. Sources located within 3km of a large body of water should be evaluated for shoreline fumigation. Procedures for estimating concentrations during the third type, rural/urban, are beyond the scope of this document.

Calculation procedures:

**Step 1.** Compute the plume height ( $h_p$ ) that will occur during F stability and a stack height wind speed of 2.5 m/s:

$$h_e = h_s + \Delta h$$

To obtain a value for  $\Delta h$ , use the procedure described in Step 3 of Section 4.2 with  $u = 2.5$  m/s. If  $v_s < 1.5u_s$ , account for stack tip downwash using Equation 4.7.

**Step 2.** Estimate the downwind distance to maximum ground-level concentration using (a) for inversion break-up and (b) for shoreline fumigation.

(a) For inversion break-up fumigation, use Table 4-4 (derived from Equation (5.5) of Turner's Workbook)<sup>9</sup> to estimate the downwind distance at which the maximum fumigation concentration is expected to occur, which is based on the time required for the

mixed layer to develop from the top of the stack to the top of the plume. If this distance is less than about 2km, then fumigation concentrations are not likely to exceed the limited mixing concentrations estimated in Step 4, Procedure (a), of Section 4.2, and may be ignored.

(b) For shoreline fumigation, the maximum fumigation concentration is expected to occur where the top of the stable plume intercepts the top of the thermal internal boundary layer (TIBL). The distance to this location, measured from the shoreline, may be estimated from Table 4-5. The distances in Table 4-5 are based on the assumption of a parabolic TIBL shape.<sup>28</sup> Subtract the distance from the source to the shoreline from the value in Table 4-5 in order to obtain the downwind distance to the maximum from the source. If the distance obtained is less than 0.2km, then the shoreline fumigation screening procedure should not be applied since the plume/TIBL interaction may be influenced by transitional plume rise effects.

**Step 3.** At the distance estimated in (2), determine the value of  $\sigma_y$  from Figure 4-18 and of  $\sigma_z$  from Figure 4-14 for F stability. Since the effects of buoyancy-induced dispersion (BID) have been incorporated in the distances determined in (2) above, it is recommended that the values for  $\sigma_y$  and  $\sigma_z$  be adjusted for BID effects as follows:

$$\sigma_y' = \sqrt{\sigma_y^2 + \left[\frac{\Delta h}{3.5}\right]^2}, \quad (4.13)$$

$$\sigma_z' = \sqrt{\sigma_z^2 + \left[\frac{\Delta h}{3.5}\right]^2},$$

where  $\Delta h$  is the plume rise determined in (1) above. The maximum fumigation estimate, particularly for shoreline fumigation, is sensitive to the inclusion of BID since it effects the distance to the maximum as well as the actual concentration calculation.

Table 4-4. Downwind Distance (km) to the Maximum Ground Level Concentration for Inversion Break-up Fumigation as a Function of Stack Height ( $h_s$ ) and Plume Height ( $h_p$ )<sup>\*</sup>

$h_s$	Plume Height, $h_p$															
	< 60	60	70	80	90	100	125	150	175	200	225	250	275	300		
10	(< 2)	2.6	3.6	4.7	5.9	7.2	11	16	20	26	32	38	46	53		
20	(< 2)	2.3	3.3	4.3	5.5	6.8	11	15	20	25	31	38	45	52		
30	(< 2)	(< 2)	2.9	3.9	5.1	6.4	10	14	19	24	30	37	44	51		
40	(< 2)	(< 2)	2.5	3.5	4.7	5.9	9.5	14	19	24	30	36	43	50		
50	(< 2)	(< 2)	2.0	3.1	4.2	5.4	9.0	13	18	23	29	35	42	49		
60	-	(< 2)	(< 2)	2.5	3.7	4.9	8.4	12	17	22	28	34	41	48		
70	-	-	(< 2)	(< 2)	3.1	4.3	7.7	12	16	21	27	33	40	47		
80	-	-	-	(< 2)	2.4	3.6	7.1	11	16	21	26	32	39	46		
90	-	-	-	-	(< 2)	2.9	6.3	10	15	20	25	31	38	45		
100	-	-	-	-	-	(< 2)	5.5	9.4	14	19	24	30	37	44		
125	-	-	-	-	-	-	3.2	7.2	12	17	22	28	34	41		
150	-	-	-	-	-	-	-	4.5	9.0	14	19	25	31	37		
175	-	-	-	-	-	-	-	-	5.9	11	16	22	28	34		
200	-	-	-	-	-	-	-	-	-	7.5	13	18	24	31		
225	-	-	-	-	-	-	-	-	-	-	9.1	15	21	27		
250	-	-	-	-	-	-	-	-	-	-	-	11	17	23		
275	-	-	-	-	-	-	-	-	-	-	-	-	13	19		
300	-	-	-	-	-	-	-	-	-	-	-	-	-	14		

<sup>\*</sup> Assume Stability Class F and Wind Speed = 2.5 m/s.

**Step 4.** Compute the maximum fumigation concentration ( $\chi_f$ ), using the following equation:<sup>9</sup>

$$\chi_f = \frac{Q}{\sqrt{2\pi u} \left[ \sigma_y' + \left( \frac{h_e}{8} \right) \right] [h_e + 2\sigma_z']} \quad (4.14)$$

For the inversion break-up case, the concentration  $\chi_f$  can be expected to persist for about 30 to 90 minutes. For shoreline fumigation, the high ground-level concentrations can persist as long as the stable onshore flow persists, up to several hours, although the location may shift as the direction of the onshore flow shifts.

**Step 5.** If the estimated fumigation concentration,  $\chi_f$ , is less than the maximum 1-hour concentration,  $\chi_1$ , estimated from Step 4 of Section 4.2, then the effects of fumigation may be ignored. If the estimated fumigation concentration exceeds the maximum 1-hour concentration estimated from Step 4 of Section 4.2, then the effect of fumigation on longer averaging periods may be accounted for as follows. The value of  $\chi$  used with the multiplying factors in Step 5 (Section 4.2) should be adjusted using a weighted average of  $\chi_1$  and  $\chi_f$ , assuming that  $\chi_f$  persists for 90 minutes. The weighted average should be calculated as follows:

Averaging Time

Adjustment of  $\chi_1$  for Fumigation

3 hours

$$\chi_1' = \frac{\chi_1 + \chi_f}{2}$$

8 hours

$$\chi_1' = \frac{13\chi_1 + 3\chi_f}{16}$$

24 hours

$$\chi_1' = \frac{15\chi_1 + \chi_f}{16}$$

Table 4-5. Downwind Distance (km) to the Maximum Ground Level Concentration for Shoreline Fumigation as a Function of Stack Height ( $h_s$ ) and Plume Height ( $h_p$ )\*

$h_s$	Plume Height, $h_p$														
	< 60	60	70	80	90	100	125	150	175	200	225	250	275	300	
10	(<0.2)	0.22	0.31	0.42	0.54	0.67	1.1	1.6	2.2	2.9	3.6	4.5	5.4	6.5	
20	(<0.2)	(<0.2)	0.28	0.38	0.49	0.62	1.0	1.5	2.1	2.8	3.5	4.4	5.3	6.3	
30	(<0.2)	(<0.2)	0.25	0.34	0.45	0.58	0.96	1.4	2.0	2.7	3.4	4.2	5.2	6.2	
40	(<0.2)	(<0.2)	0.22	0.31	0.41	0.53	0.90	1.4	1.9	2.6	3.3	4.1	5.0	6.0	
50	(<0.2)	(<0.2)	(<0.2)	0.28	0.38	0.49	0.85	1.3	1.8	2.5	3.2	4.0	4.9	5.9	
60	-	(<0.2)	(<0.2)	0.25	0.34	0.45	0.79	1.2	1.8	2.4	3.1	3.9	4.8	5.8	
70	-	-	(<0.2)	0.23	0.31	0.42	0.75	1.2	1.7	2.3	3.0	3.8	4.7	5.6	
80	-	-	-	0.22	0.29	0.39	0.70	1.1	1.6	2.2	2.9	3.7	4.5	5.5	
90	-	-	-	-	0.28	0.36	0.66	1.1	1.5	2.1	2.8	3.6	4.4	5.4	
100	-	-	-	-	-	0.35	0.62	1.0	1.5	2.1	2.7	3.5	4.3	5.2	
125	-	-	-	-	-	-	0.57	0.89	1.3	1.9	2.5	3.2	4.0	4.9	
150	-	-	-	-	-	-	-	0.85	1.2	1.7	2.3	3.0	3.8	4.6	
175	-	-	-	-	-	-	-	-	1.2	1.6	2.2	2.8	3.5	4.4	
200	-	-	-	-	-	-	-	-	-	1.6	2.0	2.6	3.3	4.1	
225	-	-	-	-	-	-	-	-	-	-	2.0	2.5	3.2	3.9	
250	-	-	-	-	-	-	-	-	-	-	-	2.5	3.0	3.7	
275	-	-	-	-	-	-	-	-	-	-	-	-	3.0	3.6	
300	-	-	-	-	-	-	-	-	-	-	-	-	-	3.6	

\* Assume Stability Class F and Wind Speed = 2.5 m/s.

The adjusted value,  $\chi_1'$ , should then be used with the multiplying factors in Step 5 of Section 4.2.

#### 4.5.4 Estimated Concentrations from Area Sources

The SCREEN2 area source algorithm is based on the equation for a finite line segment source. The current version of the Industrial Source Complex (ISC2)<sup>21</sup> model also incorporates this method of calculating downwind concentrations from area sources. This algorithm requires that the area source be square in shape. That is, the length of one side of the square is input to the program. Areas which have irregular shapes can be simulated by dividing the area source into multiple squares that approximate the geometry of the area source. The centerline ground-level concentration at a downwind distance  $x$  (measured from the downwind edge of the area source) is given by:

$$\chi_o = \frac{Q_A K x_o}{\sqrt{2} u_s \sigma_z} \operatorname{erf} \left( \frac{x_o}{\sqrt{2\pi} \sigma_y} \right), \quad (4.15)$$

where:

$Q_A$  = area source emission rate (mass per unit area per unit time)

$K$  = a scaling coefficient to convert calculated concentrations to desired units  
(default value of  $1 \times 10^6$  for  $Q$  in  $\text{g}/\text{m}^2\text{s}$  and concentration in  $\mu\text{g}/\text{m}^3$ )

$x_o$  = length of the side of the area source (m)

It is recommended that, if the separation between an area source and a receptor is less than one length of the side of the area source  $x_0$ , then the area source should be subdivided into smaller area sources.

Estimate maximum short-term (1-hour) concentrations by following the procedure for point sources outlined in Step 4 of Section 4.2, assuming no plume rise,  $\Delta h = 0$ . Do not use the multiplying factors in Step 5 of Section 4.2 to correct for averaging times greater than 1 hour. Concentrations close to an area source will not vary as much as those for point sources in response to varying wind directions, and the meteorological conditions which are likely to give maximum 1-hour concentrations (Procedures (b) and (c) of Section 4.2) can persist for several hours. Therefore it is recommended that the maximum 1-hour concentration be conservatively assumed to apply for averaging periods out to 24 hours.

#### 4.5.5 Volume Sources

SCREEN2 uses a virtual point source algorithm to model the effects of volume sources. Therefore, the Gaussian equation is used to calculate concentrations produced by volume source emissions. This method for calculating volume sources is also used by the Industrial Source Complex (ISC2)<sup>21</sup> model. If the volume source is elevated, the user assigns the effective emissions height  $h_e$ . The user also assigns initial lateral ( $\sigma_{y0}$ ) and vertical ( $\sigma_{z0}$ ) dimensions for the volume source. Lateral ( $x_y$ ) and vertical ( $x_z$ ) virtual distances are added to the actual downwind distance  $x$  for the  $\sigma_y$  and  $\sigma_z$  calculations. The virtual distances are calculated from solutions to the sigma equations as is done for point sources with building downwash.

The volume source option is used primarily to simulate the effects of non-buoyant emissions from sources such as building roof vents. Table 4-6 below summarizes the general procedures suggested for estimating initial lateral ( $\sigma_{y0}$ ) and vertical ( $\sigma_{z0}$ ) dimensions for a single volume source. There are two types of volume sources: (1) surface-based sources, which may also be modeled as area sources, and (2) elevated sources.

Table 4-6. Summary of Suggested Procedures for Estimating Initial Lateral ( $\sigma_{y0}$ ) and Vertical Dimensions ( $\sigma_{z0}$ ) for Single Volume Sources

Description of Source	Initial Dimension	
	Lateral ( $\sigma_{y0}$ )	Vertical ( $\sigma_{z0}$ )
Surface-based source ( $h_e \sim 0$ )	side length divided by 4.3	vertical dimension divided by 2.15
Elevated source ( $h_e > 0$ ) on or adjacent to a building	"	building height divided by 2.15
Elevated source ( $h_e > 0$ ) not on or adjacent to a building	"	vertical dimension divided by 4.3

#### 4.5.6 Contributions from Other Sources

To assess the significance of the air quality impact of a proposed source, the impact of nearby sources and "background" must be specifically determined. (Background includes those concentrations due to natural sources, and distant or unspecified man-made sources.) The impact of the proposed source can be separately estimated, applying the techniques presented elsewhere in Section 4, and then superimposed upon the impact of the nearby sources and background to determine total concentrations in the vicinity of the

proposed source. This section addresses the estimation of concentrations due to nearby sources and background. Three situations are considered:

- A. A proposed source relatively isolated from other sources.
- B. A proposed source in the vicinity of a few other sources.
- C. A proposed source in the vicinity of an urban area or other large number of sources.

It must be noted that in all references to air quality monitoring in the following discussion, it is assumed that the source in question is not yet operating. If the source is emitting pollutants during the period of air quality data collection, care must be taken not to use monitoring data influenced by the impact of the source. Additional guidance on determining background concentrations is provided in Section 9.2 of the Guideline on Air Quality Models (Revised).<sup>3</sup>

A. Relatively Isolated Proposed Source

A proposed source may be considered to be isolated if it is expected that background will be the only other significant contributor to ambient pollutant concentrations in its vicinity. In that case, it is recommended that air quality data from monitors in the vicinity of the proposed source be used to estimate the background concentrations. If monitoring data are not available from the vicinity of the source, use data from a "regional" site; i.e., a site that characterizes air quality across a broad area, including that in which the source is located. Annual average concentrations should be relatively easy to determine from available air quality data. For averaging times of about 24 hours or less, meteorology should be accounted for; i.e., the combined source / background concentration must be calculated for several meteorological conditions to ensure that the maximum total concentration is determined.

## B. Proposed Source in the Vicinity of a Few Other Sources

If there already are a few sources in the vicinity of the proposed facility, the air quality impact of these sources should be accounted for. As long as the number of nearby sources is relatively small, the recommended procedure is to use (1) air quality monitoring data to estimate background concentrations and (2) dispersion modeling to estimate concentrations due to the nearby source(s). Then superimpose those estimates to determine total concentrations in the vicinity of the proposed source.

To estimate background concentrations, follow the same basic procedure as in the case of an isolated source. In this case, however, there is one added complication. Wind direction must be accounted for in order to single out the air quality data that represent background only (i.e., data that are not affected by contributions from nearby sources). Concentrations due to the nearby sources will normally be best determined through dispersion modeling. The modeling techniques presented in this guideline may be used. The user should model each source separately to estimate concentrations due to each source during various meteorological conditions and at an array of receptor locations (e.g., see Sections 4.3 and 4.4.1) where interactions between the effluents of the proposed source and the nearby sources can occur. Significant locations include (1) the area of expected maximum impact of the proposed source, (2) the area of maximum impact of the nearby sources, and (3) the area where all sources will combine to cause maximum impact. It may be necessary to identify those locations through a trial and error analysis.

C. Proposed Source Within an Urban Area or in the Vicinity of a Large Number of Sources

For more than a very small number of nearby sources, it may be impractical to model each source separately. Two possible alternatives for estimating ambient concentrations due to the other sources are to use air quality monitoring data or a multisource dispersion model. If data from a comprehensive air monitoring network are available, it may be possible to rely entirely on the measured data. The data should be adequate to permit a reliable assessment of maximum concentrations, particularly in (1) the area of expected maximum impact of the proposed source, (2) the area of maximum impact of the existing sources and (3) the area where all sources will combine to cause maximum impact. In some cases, the available air quality monitor data will only be adequate to estimate general area-wide background concentrations. In such cases, there is no choice but to use dispersion modeling to estimate concentrations due to the nearby sources. If possible, a multisource dispersion model should be used. The ISCLT model can be applied for long-term concentration estimates, and the MPTER or ISCST model for short-term estimates (MPTER can handle up to 250 point sources but cannot handle building downwash effects). If it is not feasible to apply a multisource model, and there is a considerable number of nearby sources, a rough estimate of maximum concentrations due to those sources can be made by arbitrarily grouping the sources into an area source through the following equation.<sup>29</sup> (The estimate is primarily applicable to receptor locations near the center of the area source, defined below, although it may be considered a reasonable first-approximation for any location within the area):

$$C = 18Q \frac{[\Delta x]^{1/4}}{u}, \quad (4.17)$$

where:

$C$  = maximum short term (1 - 24 hours) contribution to ground-level concentrations from the area source ( $\text{g}/\text{m}^3$ )

$Q$  = average emission rate ( $\text{g}/\text{m}^2/\text{s}$ ) within the area defined by  $\Delta x$

$u$  = assumed average wind speed ( $\text{m}/\text{s}$ ) for the averaging time of concern (use 2  $\text{m}/\text{s}$  if no data are available)

$\Delta x$  = length ( $\text{m}$ ) of one side of the smallest square area that will contain the nearby sources, ignoring relatively small outlying sources or any source that is considerably removed from the other sources.

The best results will be obtained with the above equation when emissions are uniformly distributed over the defined area. Any large point sources in the vicinity should be modeled separately, and the estimated concentrations manually superimposed upon that computed for the area source. Because this is an area source approximation, the adjustment factors for averaging times greater than one hour should not be used.

#### 4.5.7 Long Range Transport

In certain instances it will be necessary to estimate the air quality impact of a proposed source at locations beyond its vicinity (beyond roughly 30 - 50km). To estimate seasonal or annual average concentrations (out to about 100km) the procedures of Section 4.4 provide a rough estimate. The procedures are limited to plume heights greater than 50m, and should not be applied beyond 100km. For short-term estimates (concentration averaging times up to about 24 hours) beyond the vicinity of the source and out to 100km downwind, the following procedure is recommended. The procedure accounts for the meteorological situations with the greatest persistence that are likely to result in the highest concentrations at large distances, i.e., neutral/high wind conditions (Steps 1-4) and stable conditions (Steps 5-7):

**Step 1.** Estimate the normalized plume rise ( $u\Delta h$ ) applicable to neutral and unstable atmospheric conditions. Use the procedure described in Step 1 of Section 4.2.

**Step 2.** Compute plume height,  $h_e$ , that will occur during D stability with a 10m wind speed of 5 m/s. Adjust the wind speed from 10m to stack height, using Equation 3.1 and the exponent for stability class D:

$$h_e = h_s + \frac{u\Delta h}{u_s}$$

**Step 3.** Using Figure 4-19, obtain a  $\chi u/Q$  value for the desired downwind distance (D stability case). (If the plume height is greater than 300m, then the value corresponding to  $h_e = 300\text{m}$  may be used for conservatism.)

**Step 4.** Compute the maximum 1-hour D stability concentration,  $x_{\text{max}}$ , using the  $\chi u/Q$  value obtained in Step 3:

$$x_{\text{max}} = Q \frac{\chi u/Q}{u_s}$$

For  $Q$ , substitute the source emission rate (g/s), and use the value of  $u_s$  determined in Step 2.

**Step 5.** Compute the plume height  $h_e = h_s + \Delta h$  that will occur during E stability with a 10m wind speed of 2 m/s. Adjust the wind speed from 10m to stack height using Equation 3.1 and the exponent for stability class E. Use the stable plume rise ( $\Delta h$ ) computed from Equation 4.6 in Step 3 of Section 4.2:

$$h_e = h_s + \Delta h$$

**Step 6.** From Figure 4-20, obtain a  $\chi u/Q$  value for the same distance considered in Step 3 above. (If the plume height is greater than 300m, then the value corresponding to  $h_e = 300\text{m}$  may be used for conservatism).

**Step 7.** Compute the maximum 1-hour E stability concentration,  $x_{\max}$ , using the  $\chi u/Q$  value obtained in Step 6:

$$x_{\max} = Q \frac{\chi u/Q}{u_s},$$

where  $u_s$  was determined in Step 5.

**Step 8.** Select the higher of the  $x_{\max}$  values computed in Steps 4 and 7. The selected value represents the highest 1-hour concentration likely to occur at the specified distance.

**Step 9.** To estimate concentrations for averaging times up to annual, multiply the 1-hour value by the factors presented in Step 5 of Section 4.2.

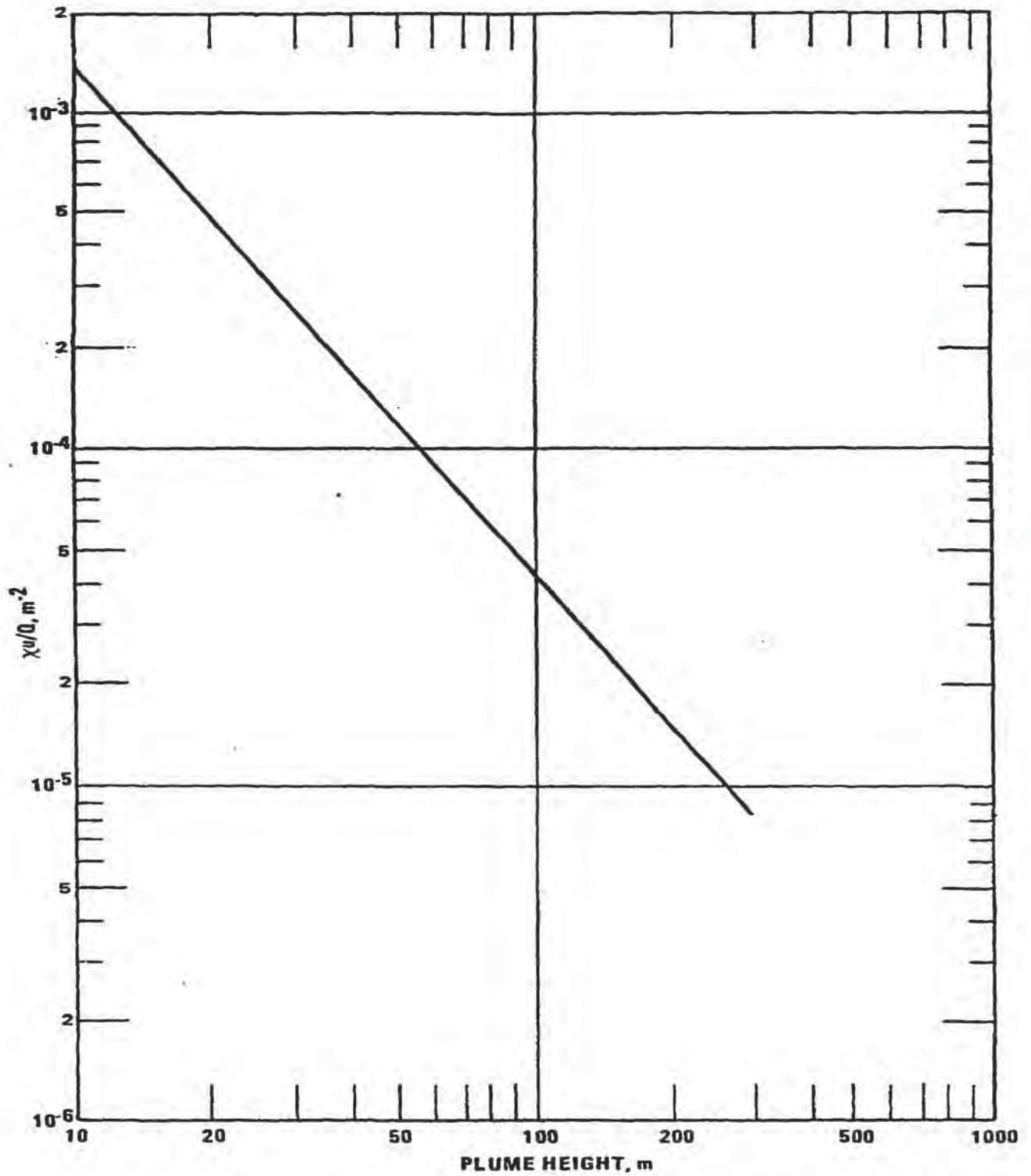


Figure 4-1. Maximum  $\chi_u/Q$  as a function of plume height, H (for use only with the simple screening procedure).

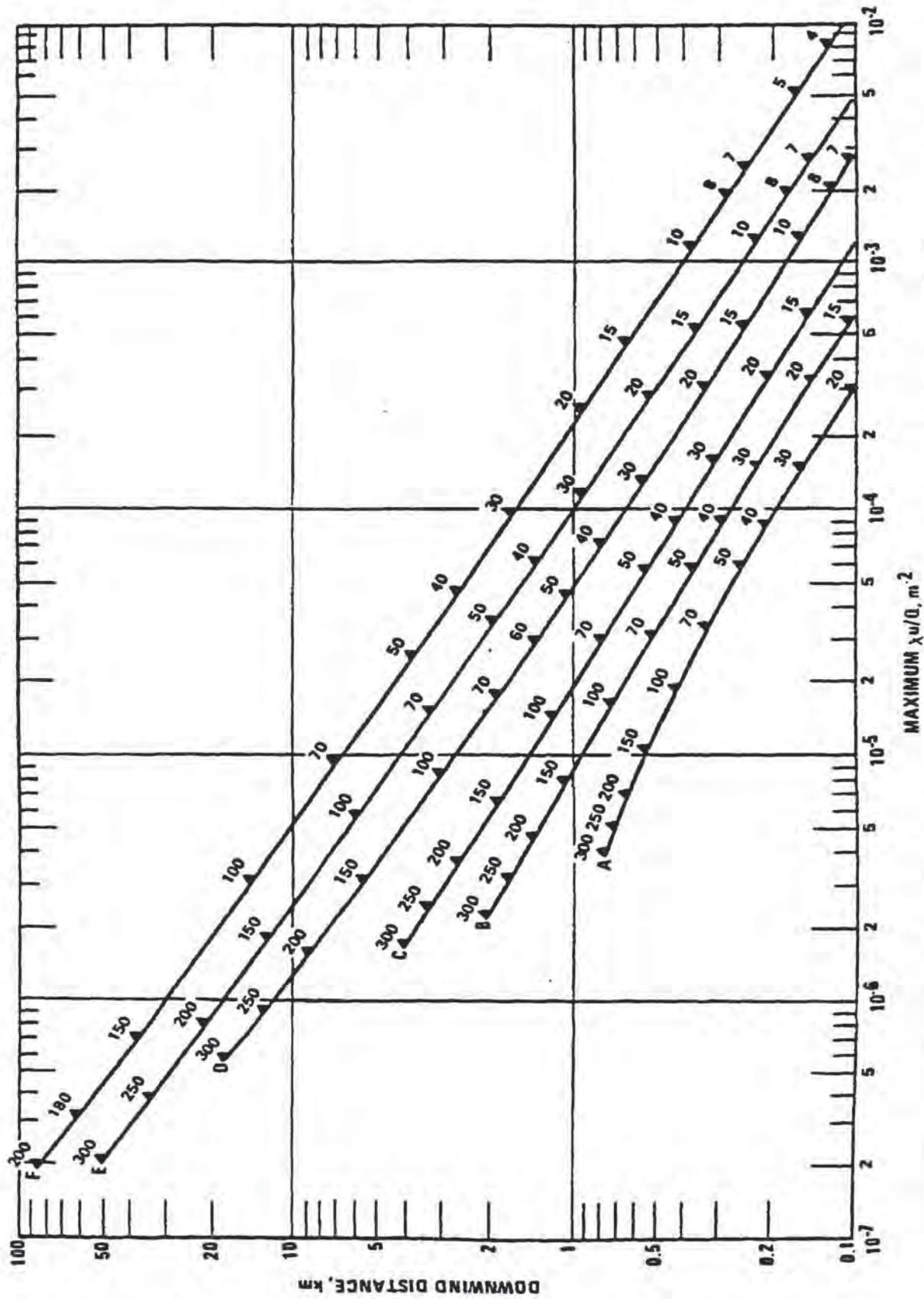


Figure 4-2. Downwind distance to maximum concentration and maximum  $\chi_u/Q$  as a function of stability class for rural terrain.<sup>17</sup> Plume heights (m) are indicated on the curves.

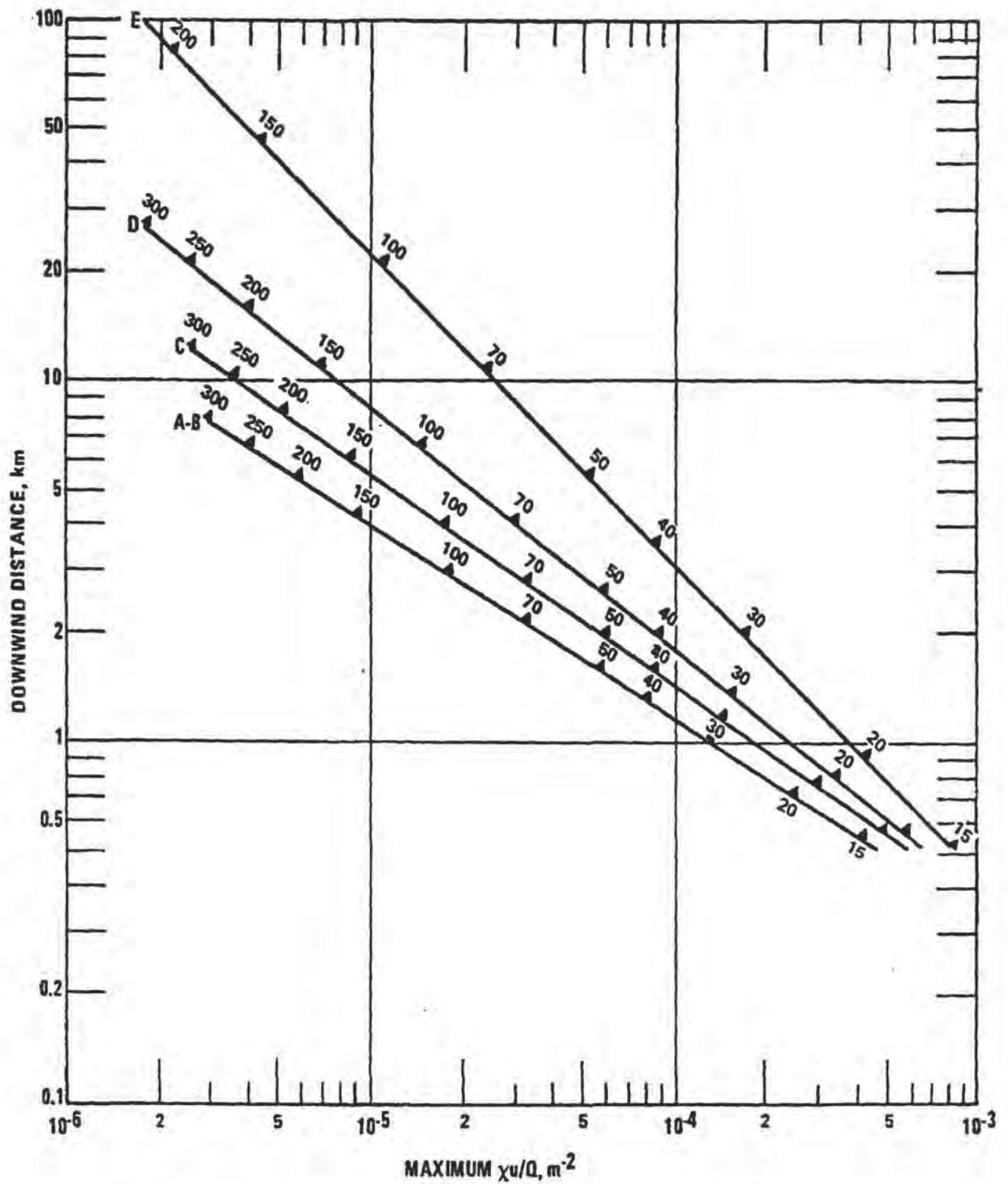


Figure 4-3. Downwind distance to maximum concentration and maximum  $\chi u/Q$  as a function of stability class for urban terrain. Plume heights (m) are indicated on the curves.

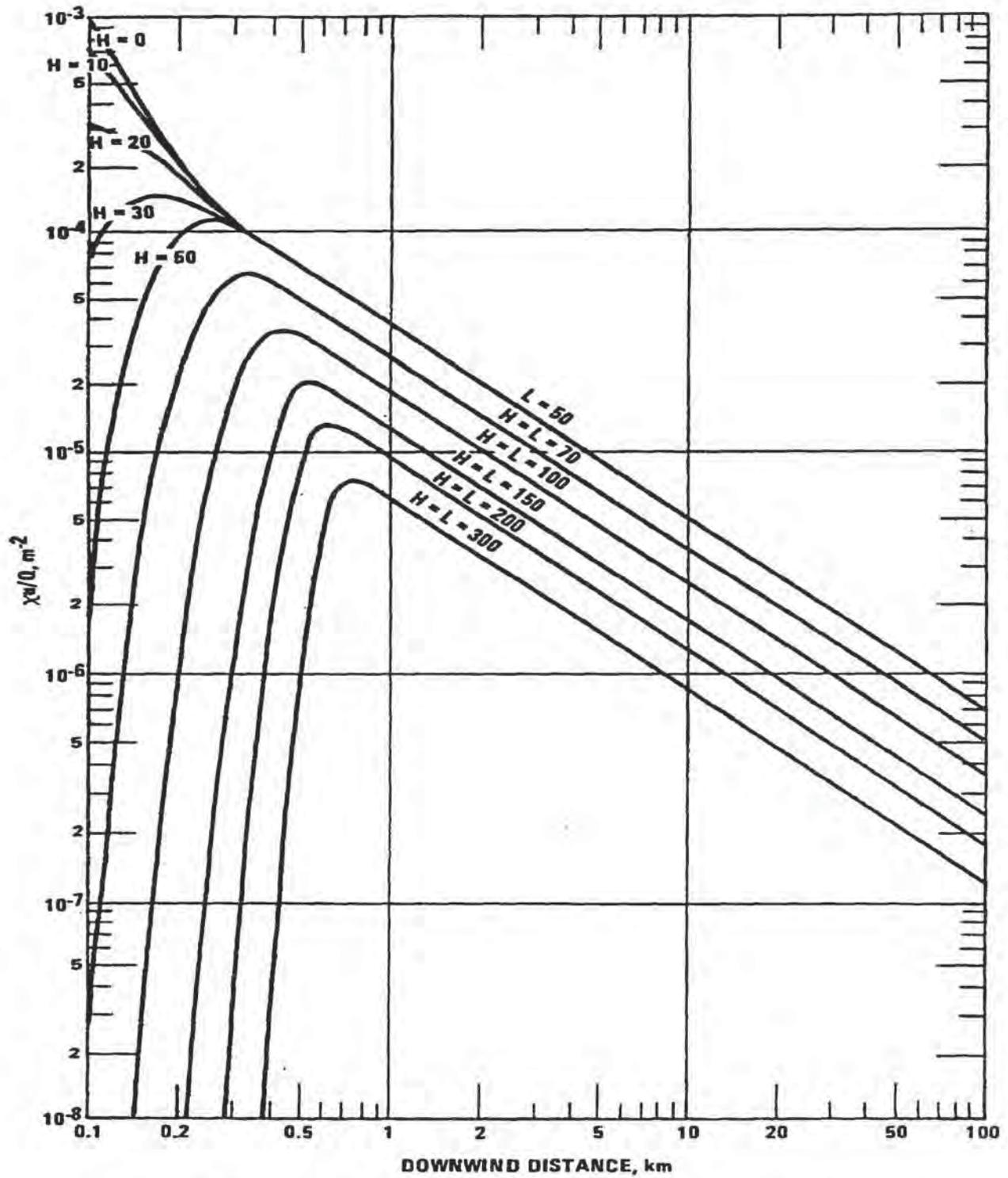


Figure 4-4. Stability class A, rural terrain;  $\chi_w/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

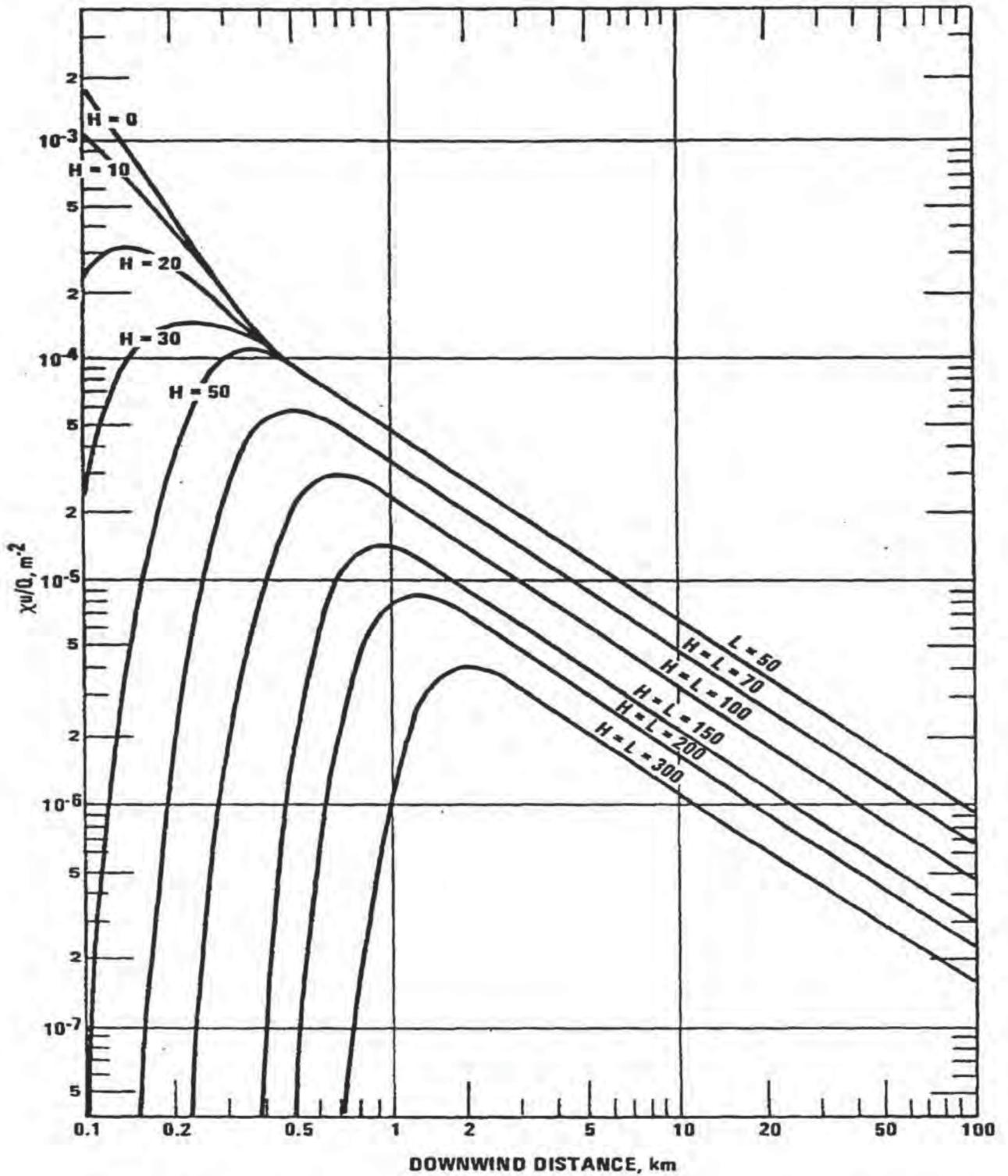


Figure 4-5. Stability class B, rural terrain;  $\chi u/Q$  vs. distance for various plume heights ( $H$ ), assuming very restrictive mixing heights ( $L$ );  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

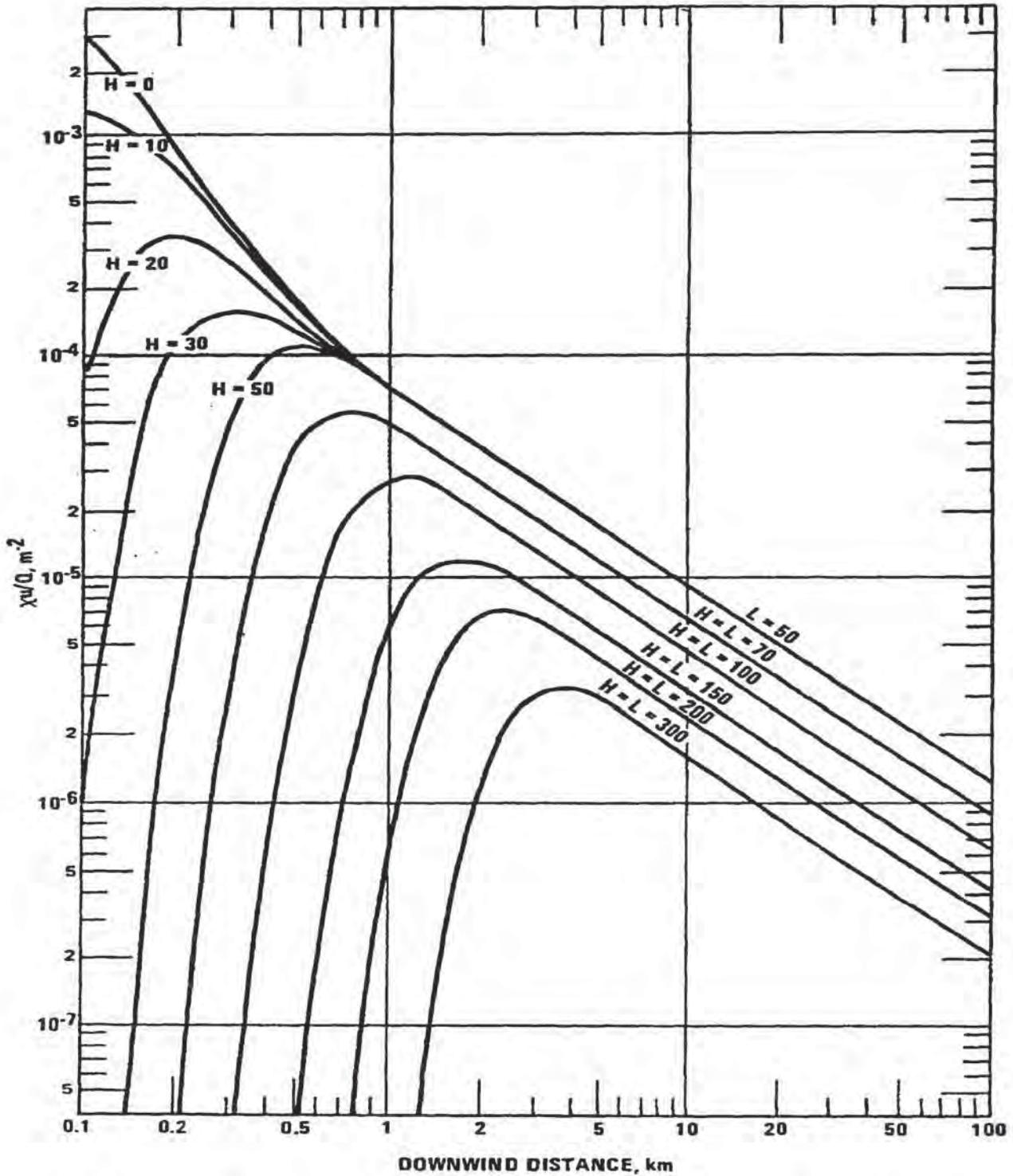


Figure 4-6. Stability class C, rural terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L); L = 50m for  $H \leq 50m$ ; L = H for  $H > 50m$ .

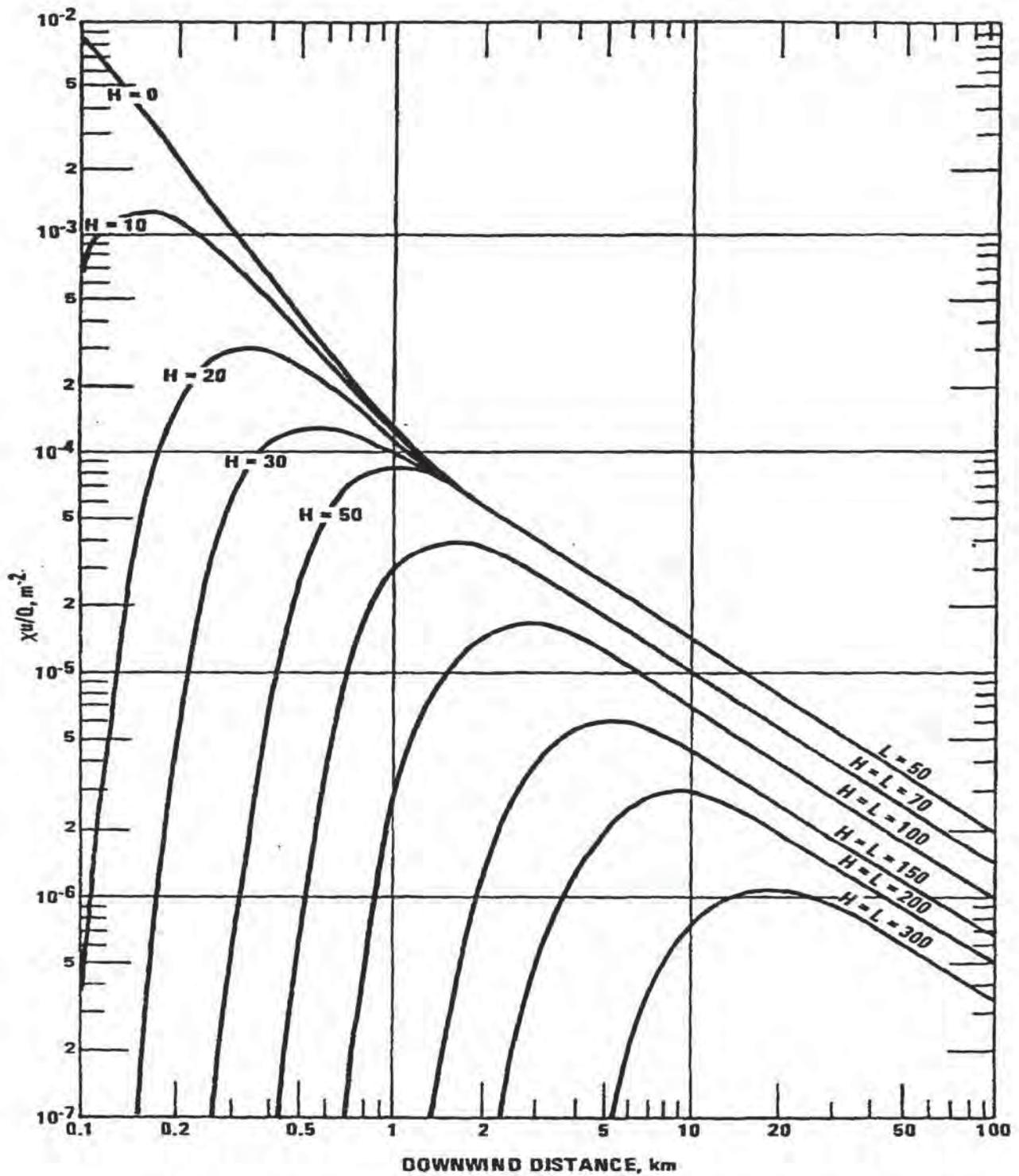


Figure 4-7. Stability class D, rural terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

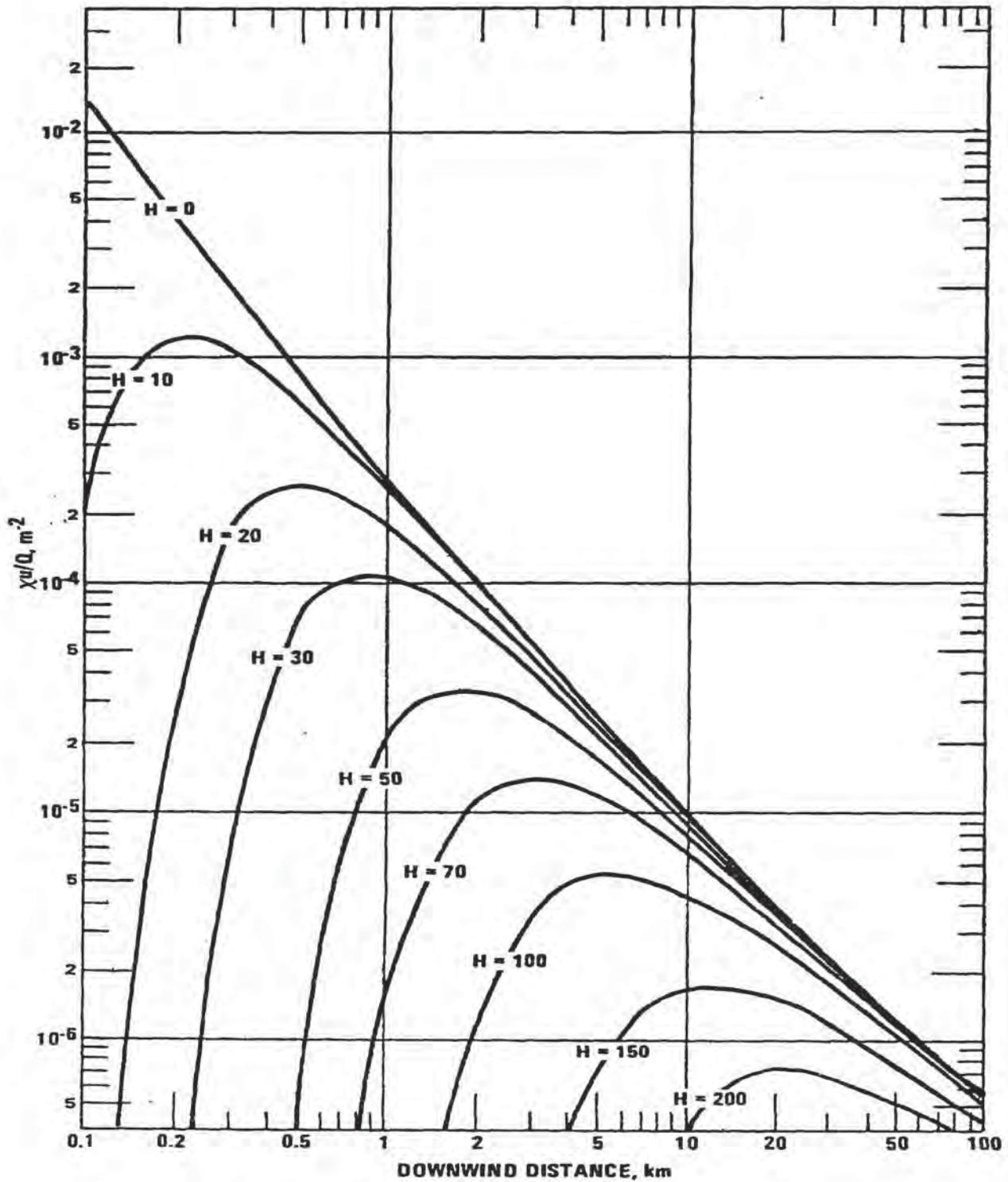


Figure 4-8. Stability class E, rural terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

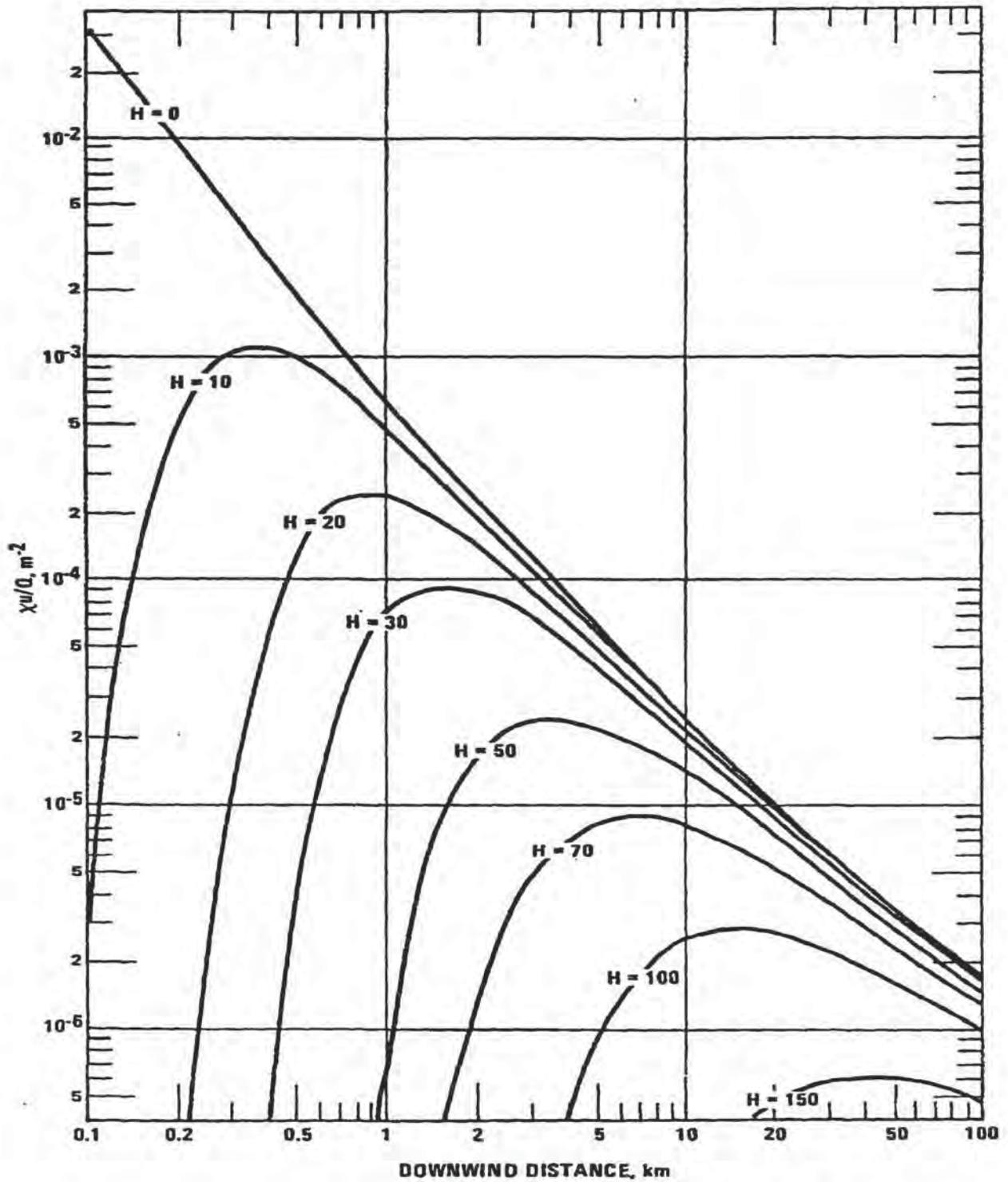


Figure 4-9. Stability class F, rural terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

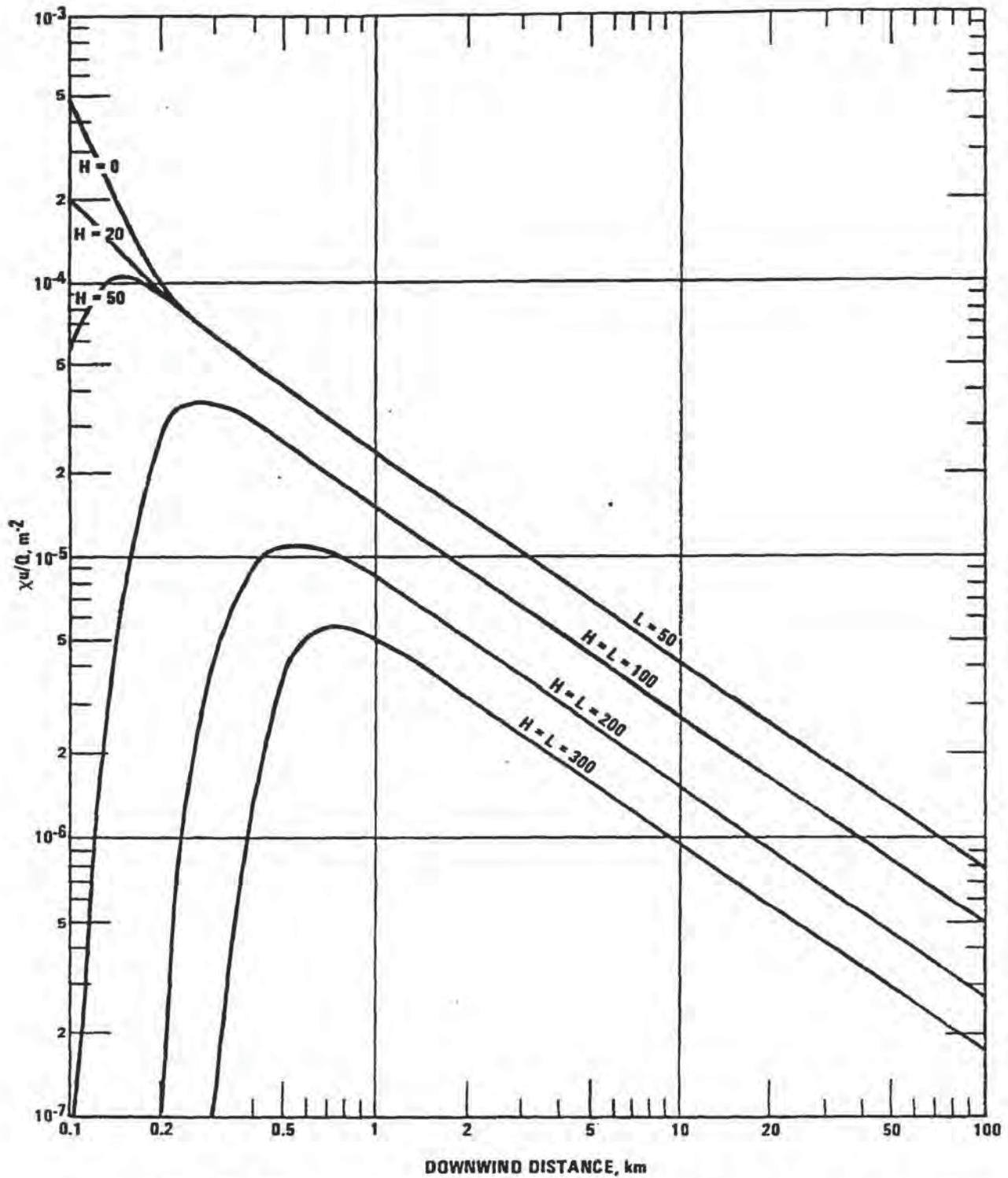


Figure 4-10. Stability classes A and B, urban terrain;  $\chi u/Q$  vs. distance for various plume heights ( $H$ ), assuming very restrictive mixing heights ( $L$ );  $L = 50m$  for  $H \leq 50m$ ;  $L = H$  for  $H > 50m$ .

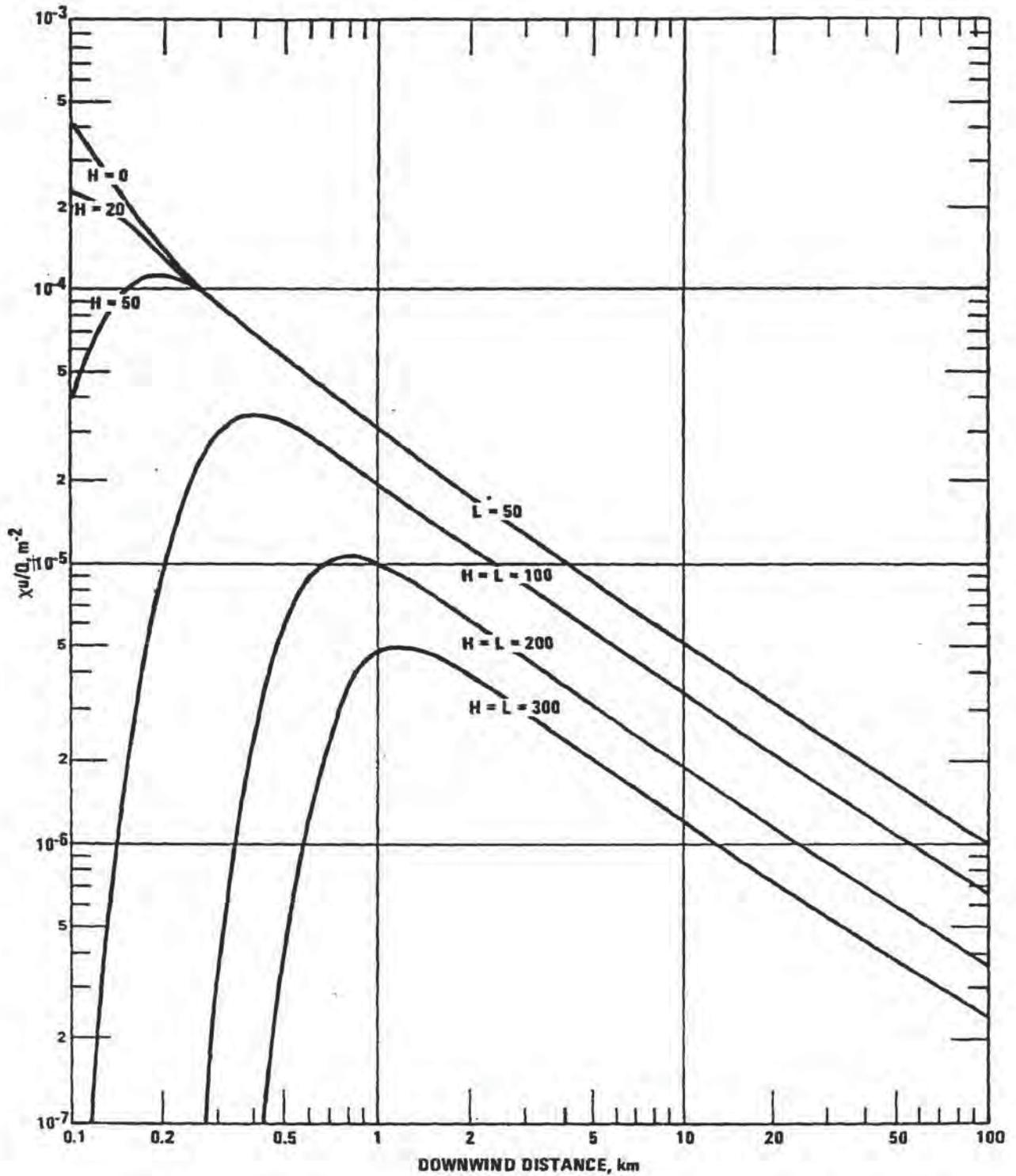


Figure 4-11. Stability class C, urban terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50\text{m}$  for  $H \leq 50\text{m}$ ;  $L = H$  for  $H > 50\text{m}$ .

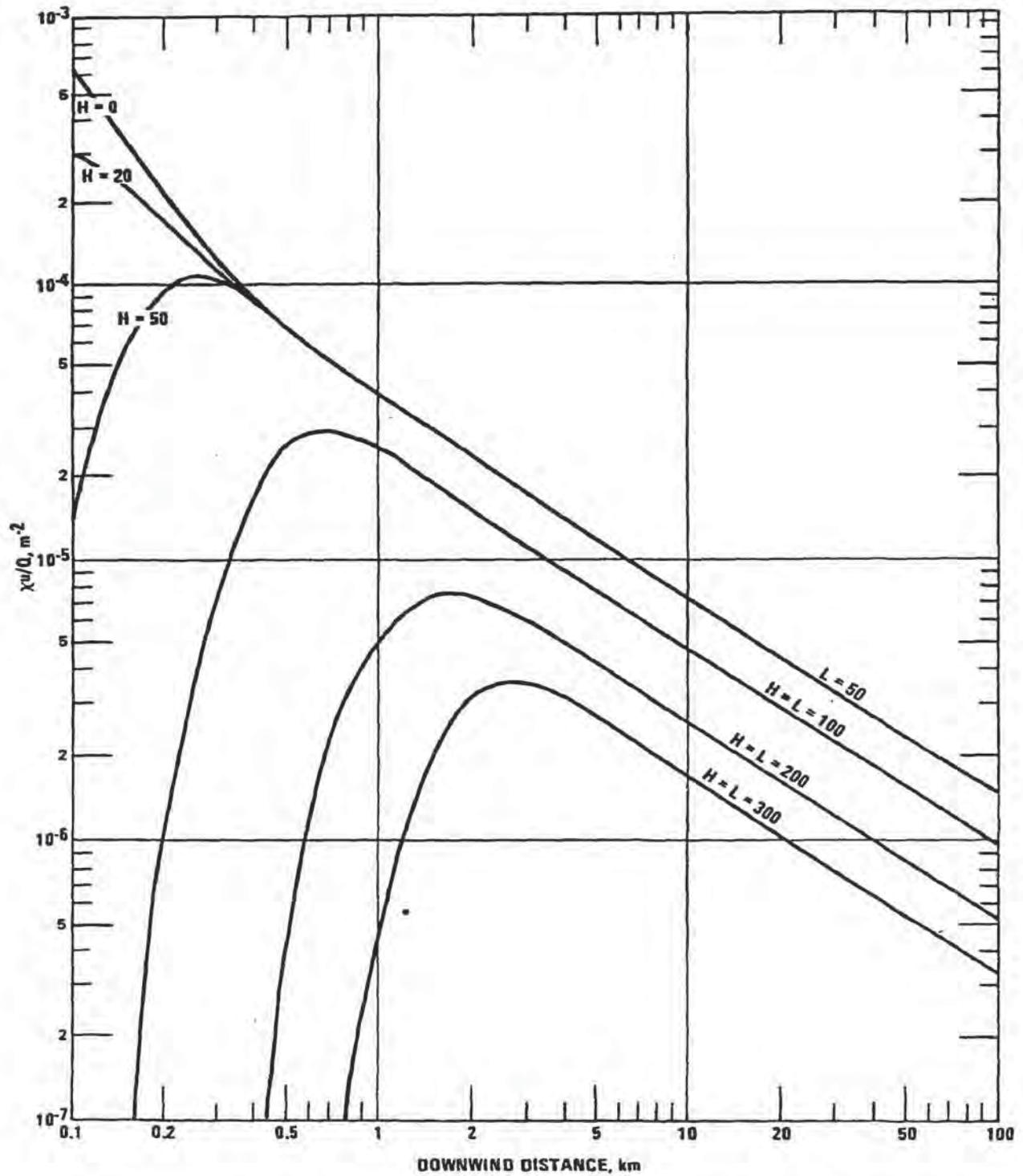


Figure 4-12. Stability class D, urban terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L); L = 50m for  $H \leq 50m$ ; L = H for  $H > 50m$ .

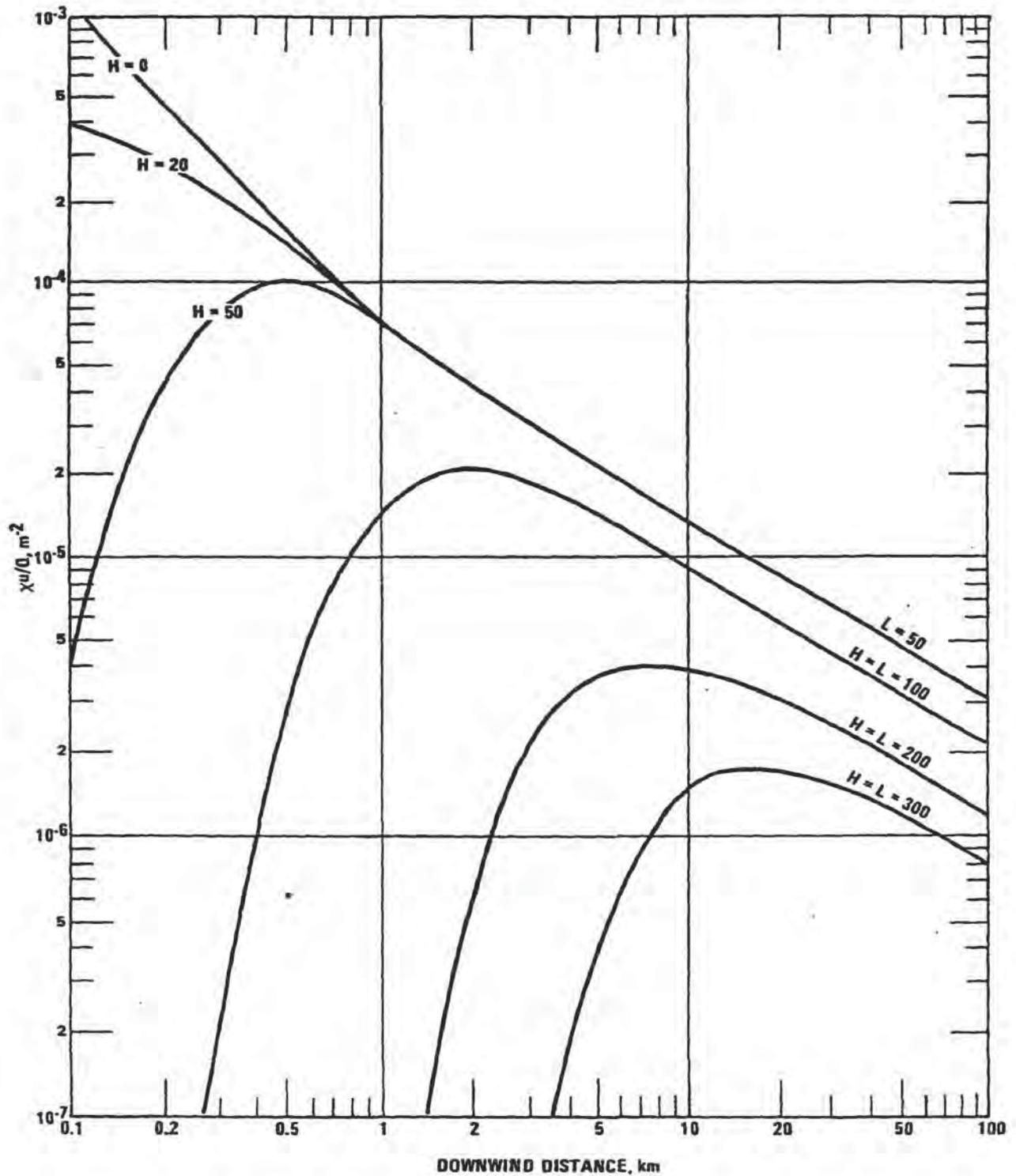


Figure 4-13. Stability class E, urban terrain;  $\chi u/Q$  vs. distance for various plume heights (H), assuming very restrictive mixing heights (L);  $L = 50\text{m}$  for  $H \leq 50\text{m}$ ;  $L = H$  for  $H > 50\text{m}$ .

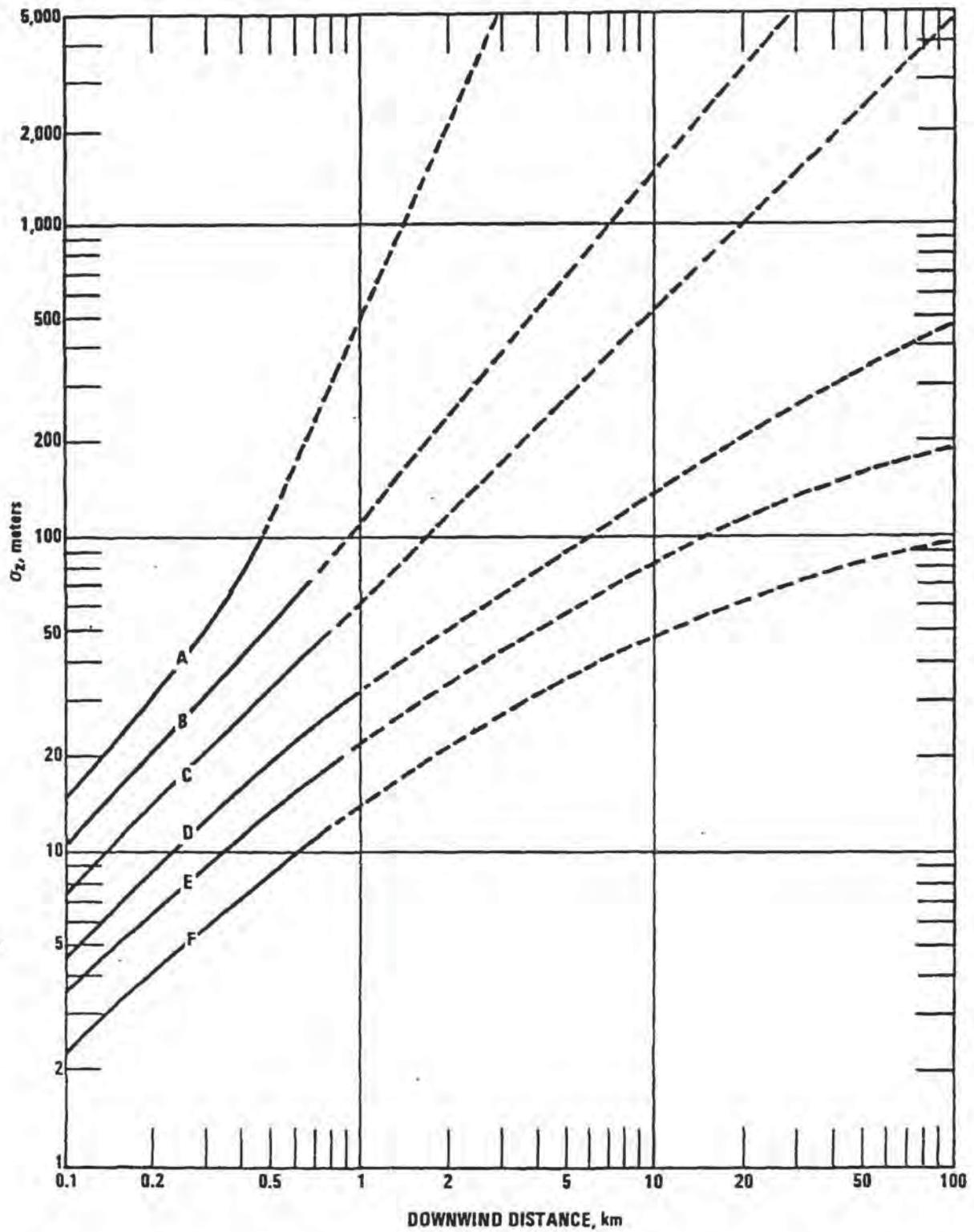


Figure 4-14. Vertical dispersion parameter ( $\sigma_z$ ) as a function of downwind distance and stability class; rural terrain.

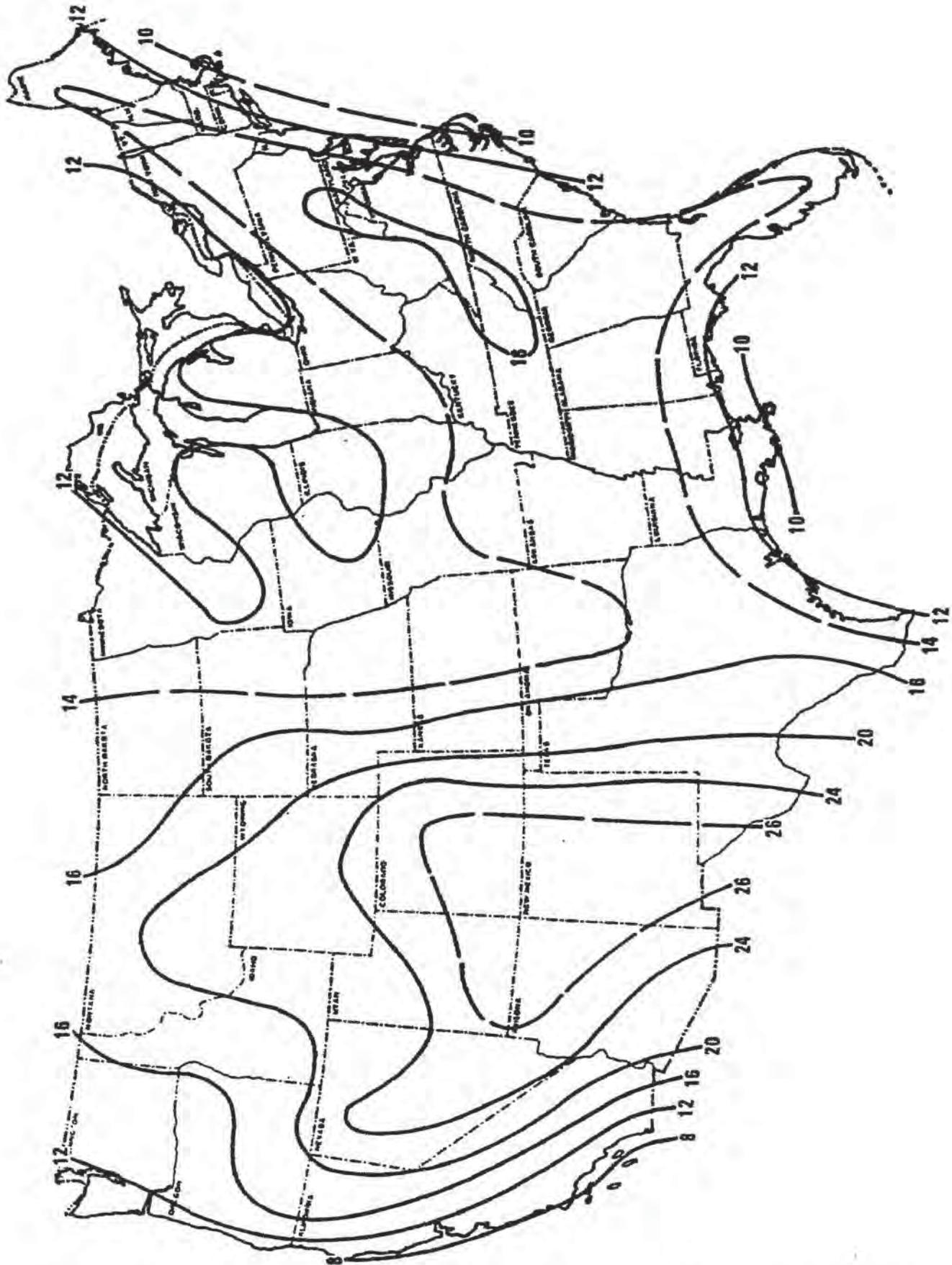


Figure 4-15. Isopleths (hundredths of meters) of mean annual afternoon mixing heights.



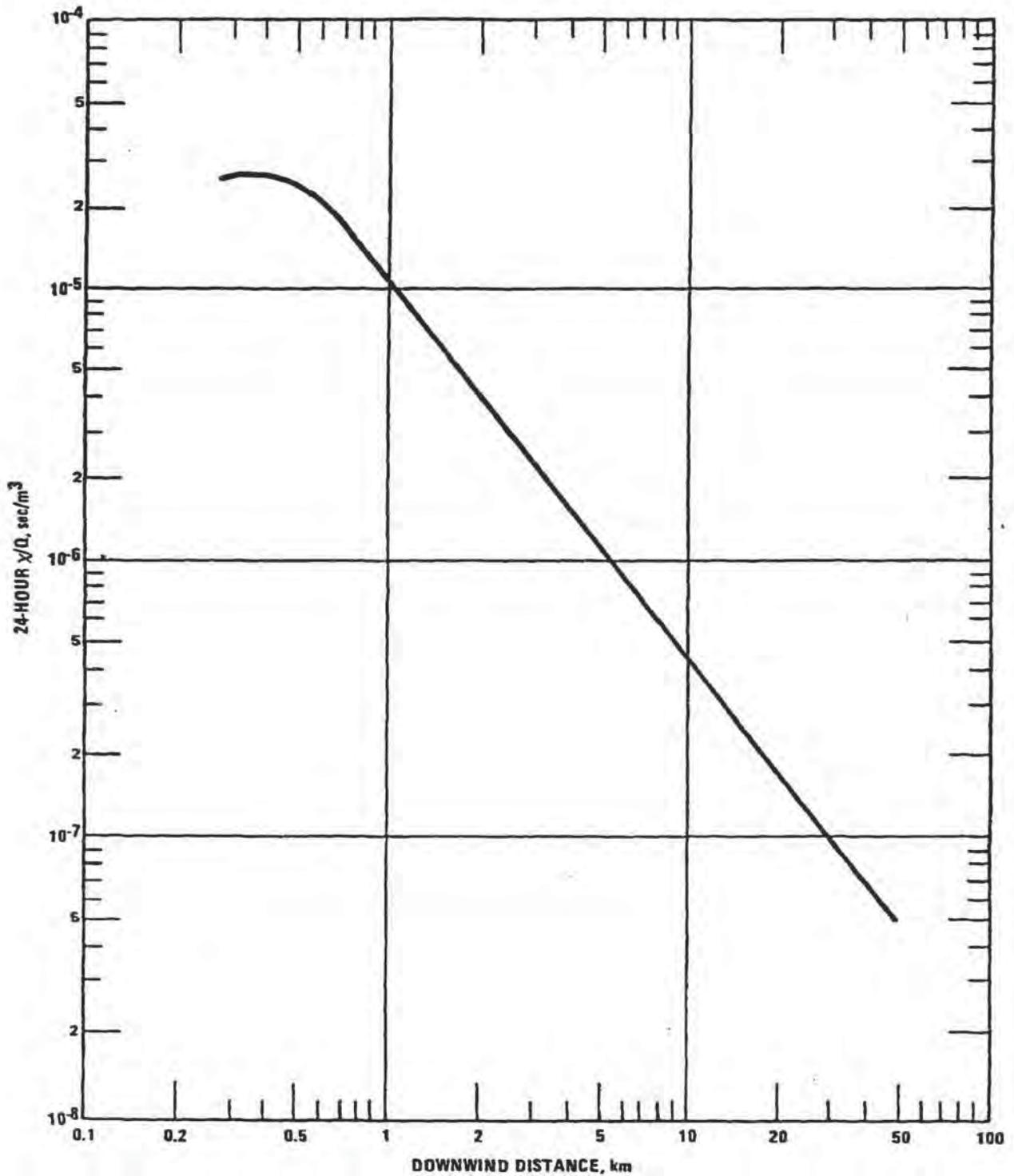


Figure 4-17. 24-hour  $\chi/Q$  vs. downwind distance, obtained from the Valley model. Assumptions include: stability class F, wind speed = 2.5 m/s, and plume height 10m above terrain.

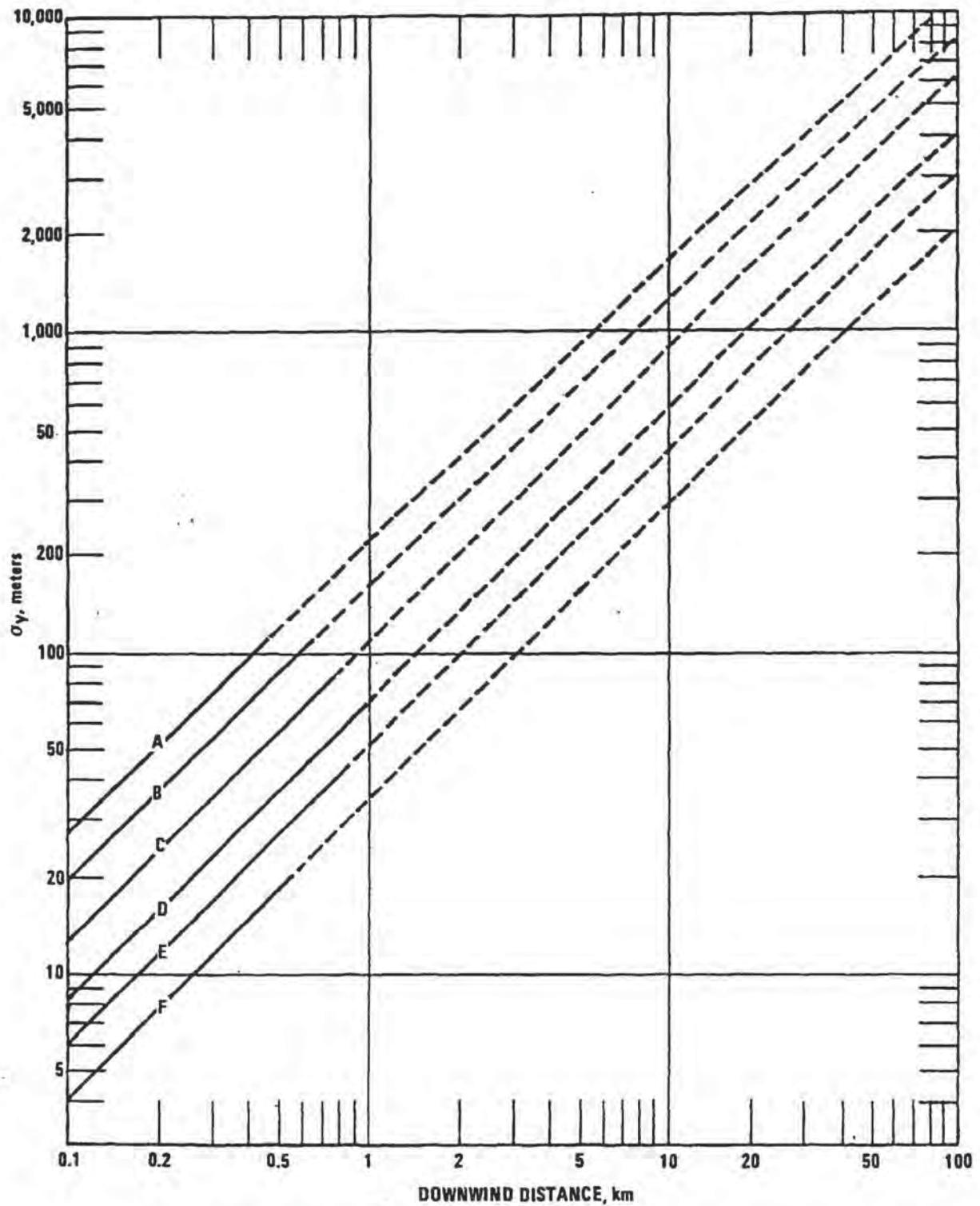


Figure 4-18. Horizontal dispersion parameter ( $\sigma_y$ ) as a function of downwind distance and stability class; rural terrain.

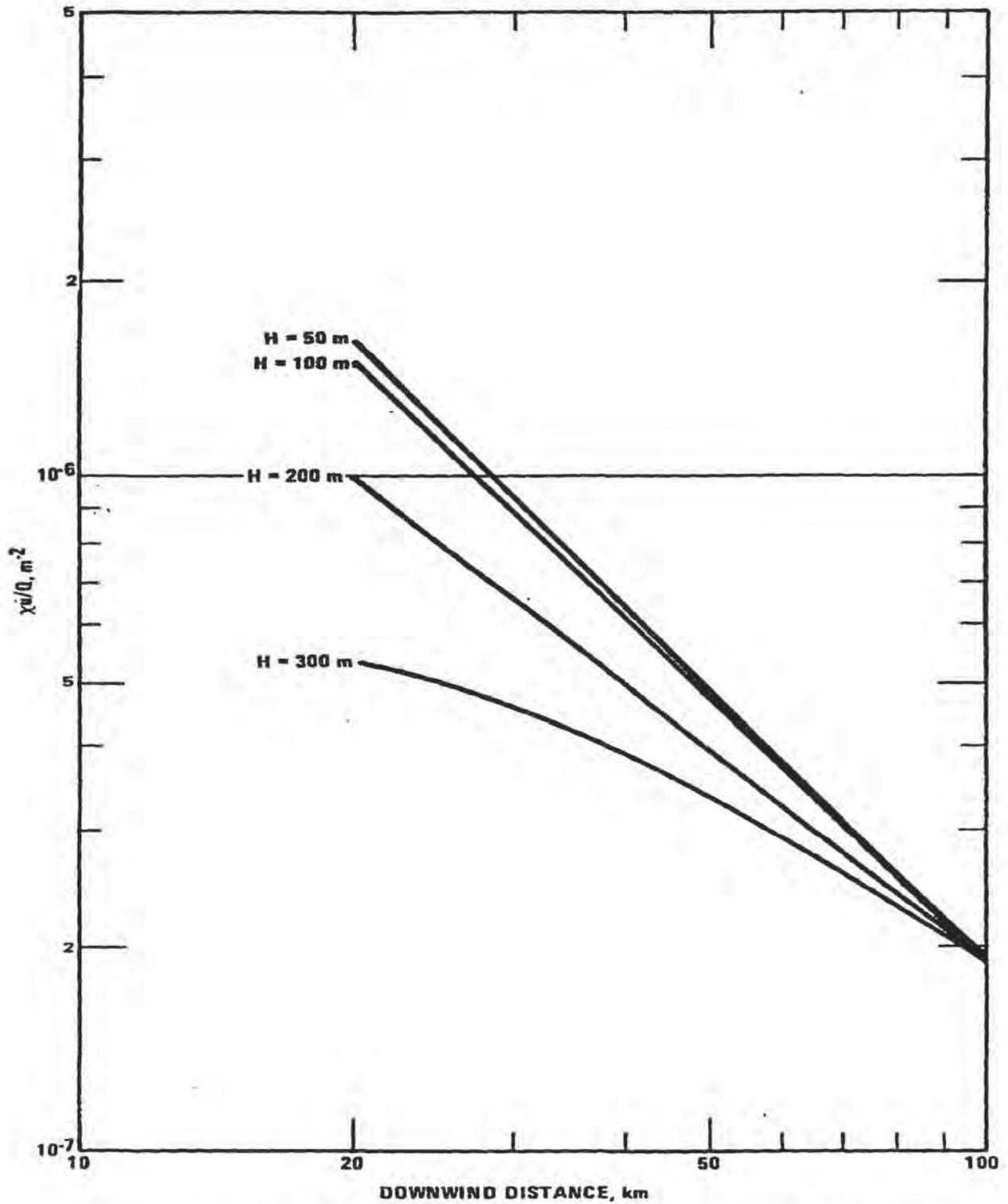


Figure 4-19. Maximum  $\chi u/Q$  as a function of downwind distance and plume height (H), assuming a mixing height of 500m; D stability.

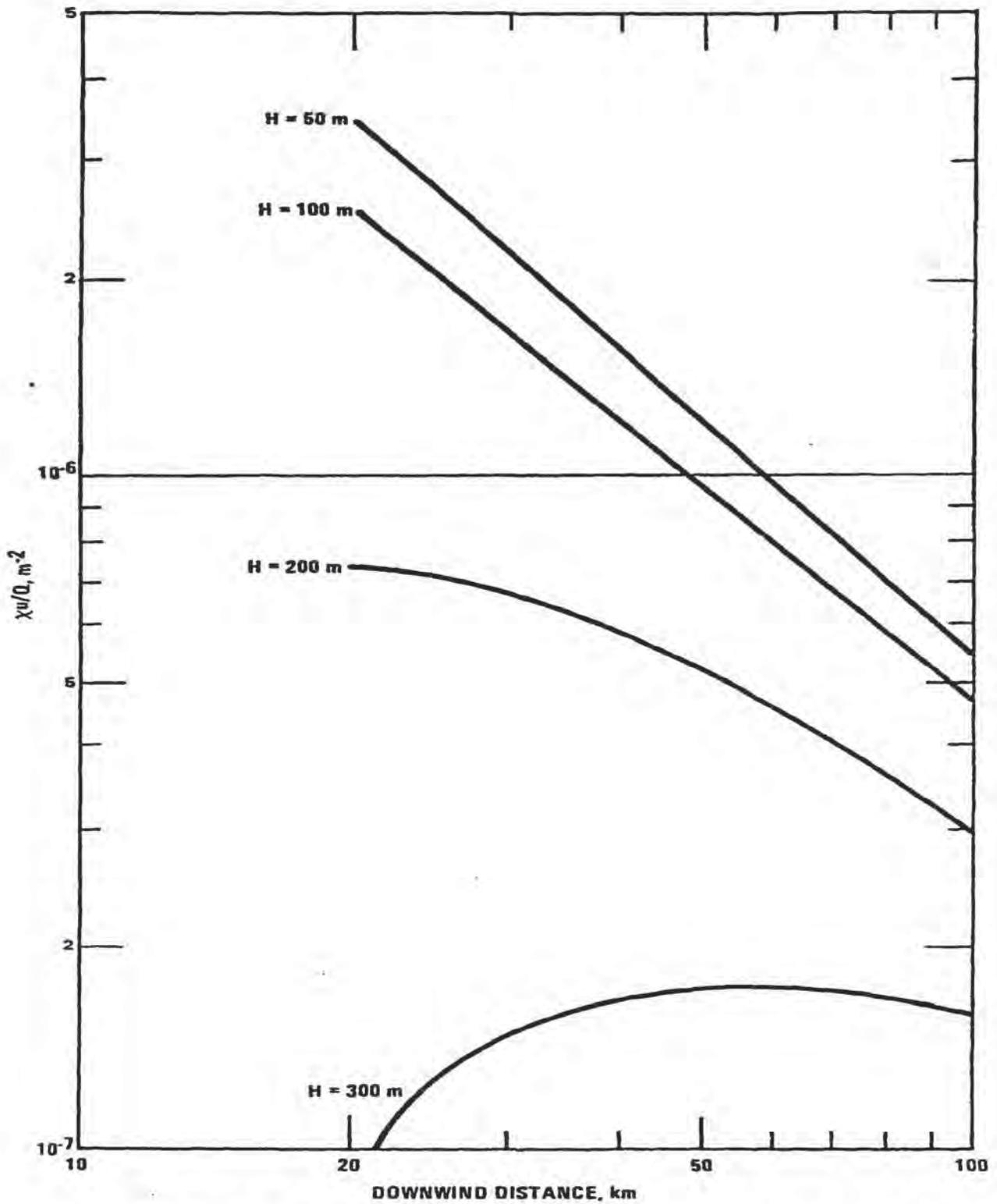


Figure 4-20. Maximum  $\chi u/Q$  as a function of downwind distance and plume height (H); E stability.

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BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

**BAAQMD**  
**Air Toxics NSR Program**  
**Health Risk Screening Analysis**  
**(HRSA) Guidelines**

**January 2010**

**BAY AREA AIR QUALITY MANAGEMENT DISTRICT  
939 ELLIS STREET  
SAN FRANCISCO, CA 94109**

**BAAQMD Air Toxics NSR Program  
Health Risk Screening Analysis (HRSA) Guidelines**

**1. INTRODUCTION**

This document describes the Bay Area Air Quality Management District's guidelines for conducting health risk screening analyses. Any health risk screening analysis (HRSA) that is required pursuant to Regulation 2 Permits, Rule 1 General Requirements or Rule 5 New Source Review of Toxic Air Contaminants shall be conducted in accordance with these guidelines.

In accordance with Regulation 2-5-402, these guidelines generally conform to the Health Risk Assessment Guidelines adopted by Cal/EPA's Office of Environmental Health Hazard Assessment (OEHHA) for use in the Air Toxics Hot Spots Program. In addition, these guidelines are in accordance with State risk assessment and risk management policies and guidelines in effect as of June 1, 2009. Through the District's rule development process, these guidelines will periodically be updated to clarify procedures, amend health effects data, or incorporate other revisions to regulatory guidelines.

**2. PROCEDURES**

The procedures described below constitute the Regulation 2-5-603 Health Risk Screening Analysis Procedures. Any HRSA shall be completed by following the procedures described in the OEHHA Health Risk Assessment Guidelines for the Air Toxics Hot Spots Program that were adopted by OEHHA on October 3, 2003 and any State risk assessment and risk management policies and guidelines in effect as of June 1, 2009.

The OEHHA Health Risk Assessment Guidelines contain several sections which identify (a) the overall methodology, (b) the exposure assessment assumptions and procedures, and (c) the health effects data (cancer potency factors, chronic reference exposure levels, and acute reference exposure levels).

A summary of OEHHA's Health Risk Assessment Guidelines and an index of the relevant documents are located at:

[http://www.oehha.ca.gov/air/hot\\_spots/index.html](http://www.oehha.ca.gov/air/hot_spots/index.html)

OEHHA's risk assessment methodology is located at:

[http://www.oehha.ca.gov/air/risk\\_assess/index.html](http://www.oehha.ca.gov/air/risk_assess/index.html)

The exposure assessment and stochastic technical support document (Part IV of OEHHA's Risk Assessment Guidelines) is located at:

[http://www.oehha.ca.gov/air/exposure\\_assess/index.html](http://www.oehha.ca.gov/air/exposure_assess/index.html)

The Technical Support Document for Cancer Potency Factors: Methodologies for Derivation, Listing of Available Values, and Adjustments to Allow for Early Life Stage Exposures (May 2009) is located at:

[http://www.oehha.ca.gov/air/hot\\_spots/tsd052909.html](http://www.oehha.ca.gov/air/hot_spots/tsd052909.html)

The Technical Support Document for the Derivation of Noncancer Reference Exposure Levels is located at:

[http://www.oehha.ca.gov/air/hot\\_spots/rels\\_dec2008.html](http://www.oehha.ca.gov/air/hot_spots/rels_dec2008.html)

Sections 2.1 through 2.3 below clarify and highlight some of the exposure assessment procedures including exposure assumptions (e.g., breathing rate and exposure duration) and health effect values to be used for conducting HRSAs.

## **2.1 Clarifications of Exposure Assessment Procedures**

This section clarifies and highlights some of the exposure assessment procedures that should be followed when conducting an HRSA. Please note that OEHHA is currently revising the Technical Support Document (TSD) for Exposure Assessment. When the revised TSD for Exposure Assessment is finalized and adopted, the District will revise the HRSA Guidelines accordingly.

### **2.1.1 Breathing Rate**

On October 9, 2003, a statewide interim Risk Management Policy for inhalation-based residential cancer risk was adopted by the California Air Resources Board (ARB) and Cal/EPA's OEHHA (<http://www.arb.ca.gov/toxics/rmpolicy.pdf>). For the HRSA methodology used in the Air Toxics NSR Program, the District has conformed with these State guidelines and adopted the interim exposure assessment recommendations made by ARB and OEHHA. The interim policy recommends where a single cancer risk value for a residential receptor is needed or prudent for risk management decision-making, the potential cancer risk estimate for the inhalation exposure pathway be based on the breathing rate representing the 80<sup>th</sup> percentile value of the breathing rate range of values (302 L/kg-day).

To assess potential inhalation exposure to offsite workers, OEHHA recommends assuming a breathing rate of 149 L/kg-day. This value corresponds to a 70 kg worker breathing 1.3 m<sup>3</sup>/hour (breathing rate recommended by USEPA as an hourly average for outdoor workers) for an eight-hour day.

For children, OEHHA recommends assuming a breathing rate of 581 L/kg-day to assess potential risk via the inhalation exposure pathway. This value represents the upper 95% percentile of daily breathing rates for children.

### 2.1.2 Exposure Time and Frequency

Based on OEHHA recommendations, the District will estimate cancer risk to residential receptors assuming exposure occurs 24 hours per day for 350 days per year. For a worker receptor, exposure is assumed to occur 8 hours per day for 245 days per year. However, for some professions (e.g., teachers) a different schedule may be more appropriate. For children at school sites, exposure is assumed to occur 10 hours per day for 180 days (or 36 weeks) per year.

### 2.1.3 Exposure Duration

Based on OEHHA recommendations, the District will estimate cancer risk to residential receptors based on a 70-year lifetime exposure. Although 9-year and 30-year exposure scenarios may be presented for information purposes, risk management decisions will be made based on 70-year exposure duration for residential receptors. For worker receptors, risk management decisions will be made based on OEHHA's recommended exposure duration of 40 years. Cancer risk estimates for children at school sites will be calculated based on a 9 year exposure duration.

## 2.2 Health Effects Values

Chemical-specific health effects values have been consolidated and are presented in Table 2-5-1 for use in conducting HRSA's. Toxicity criteria summarized in Table 2-5-1 represent health effects values that were adopted by OEHHA/ARB as of June 1, 2009. Although 8-hour RELs for six chemicals were adopted in December 2008, these 8-hour RELs will not be used in conducting HRSA's until OEHHA finalizes and adopts the revised TSD for Exposure Assessment. Prior to use in Regulation 2, Rule 5, any new or revised health effects values adopted by OEHHA/ARB after June 1, 2009 will be reviewed by the District through a rule development process. The District will evaluate the new criteria for implementation, enforcement, and feasibility of compliance with the project risk limits.

### 2.3 Cancer Risk Calculations

In accordance with OEHHA's revised health risk assessment guidelines (specifically, OEHHA's Technical Support Document (TSD) for Cancer Potency Factors, adopted June 1, 2009), calculation of cancer risk estimates should incorporate age sensitivity factors (ASFs).

The revised TSD for Cancer Potency Factors provides updated calculation procedures used to consider the increased susceptibility of infants and children to carcinogens, as compared to adults. The updated calculation procedure includes the use of age-specific weighting factors in calculating cancer risks from exposures of infants, children and adolescents, to reflect their anticipated special sensitivity to carcinogens. OEHHA recommends weighting cancer risk by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age, and by a factor of 3 for exposures that occur from 2 years through 15 years of age. These weighting factors should be applied to all carcinogens. For estimating cancer risk for residential receptors, the incorporation of the ASFs results in a cancer risk adjustment factor of 1.7. For estimating cancer risk for student receptors, a cancer risk adjustment factor of 3 should be applied. For estimating cancer risk for worker receptors, a cancer risk adjustment factor of 1 should be applied.

The cancer risk adjustment factors were developed based on the following:

Receptor	Age Bins	ASF	Duration	Cancer Risk Adjustment Factor
Resident	Third trimester to age 2 years	10	2.25/70	0.32
	Age 2 to age 16 years	3	14/70	0.60
	Age 16 to 70 years	1	54/70	0.77
	Total lifetime			<b>1.7</b>
Student	Age 2 to age 16 years	3	9 years	<b>3</b>
Worker	Age 16 to 70 years	1	40 years	<b>1</b>

Since the exposure duration for a student receptor (9 years), and worker receptor (40 years), falls within a single age bin, the student cancer risk adjustment factor is 3 and the worker cancer risk adjustment factor is 1.

Cancer risk adjustment factors should be used to calculate all cancer risk estimates. Please note that these ASFs represent default values. In cases where there are adequate data for specific carcinogen potency by age, OEHHA will recommend chemical-specific adjustments to cancer risk estimates. In addition, OEHHA is currently revising the TSD for Exposure Assessment. When the revised TSD for Exposure Assessment is finalized and adopted, the District will revise the HRSA Guidelines accordingly.

Below is the equation for calculating cancer risk estimates:

$$\text{Cancer Risk} = \text{Dose} * \text{Cancer Risk Adjustment Factor} * \text{Cancer Potency Factor}$$

## 2.4 Stochastic Risk Assessment

For a stochastic, multipathway risk assessment, the potential cancer risk should be reported for the full distribution of exposure from all exposure pathways included in the risk assessment. For risk management decisions, the potential cancer risk from a stochastic, multipathway risk assessment should be based on the 95<sup>th</sup> percentile cancer risk.

## 3. Assessment of Acrolein Emissions

Currently, CARB does not have certified emission factors or an analytical test method for acrolein. Therefore, since the appropriate tools needed to implement and enforce acrolein emission limits are not available, the District will not conduct a HRSA for emissions of acrolein. When the necessary tools are developed, the District will re-evaluate this specific evaluation procedure and the HRSA guidelines will be revised.

### *References*

- 1 *“Air Toxics “Hot Spots” Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, ”, OEHHA, August 2003*
- 2 *“Air Toxics “Hot Spots” Program Risk Assessment Guidelines, Part IV. Technical Support Document for Exposure Assessment and Stochastic Analysis”, OEHHA, September 2000*
- 3 *“Air Toxics “Hot Spots” Program Risk Assessment Guideline, Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures”, OEHHA, May, 2009.*
- 4 *“Air Toxics “Hot Spots” Program Risk Assessment Guidelines Technical Support Document for the Determination of Noncancer Reference Exposure Levels”, OEHHA, June 2008.*
- 5 *“Guidance for School Site Risk Assessment Pursuant to Health and Safety Code Section 901(f): Guidance for Assessing Exposures and Health Risks at Existing and Proposed School Sites: Final Report”, Integrated Risk Assessment Section, Office of Environmental Health Hazard Assessment, California Environmental Protection Agency, February, 2004.*
- 6 *“Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values”, California Air Resources Board, updated February, 2009.*

**This fact sheet answers the most frequently asked health questions (FAQs) about total petroleum hydrocarbons (TPH). For more information, call the ATSDR Information Center at 1-888-422-8737. This fact sheet is one in a series of summaries about hazardous substances and their health effects. It's important you understand this information because this substance may harm you. The effects of exposure to any hazardous substance depend on the dose, the duration, how you are exposed, personal traits and habits, and whether other chemicals are present.**

**HIGHLIGHTS: TPH is a mixture of many different compounds. Everyone is exposed to TPH from many sources, including gasoline pumps, spilled oil on pavement, and chemicals used at home or work. Some TPH compounds can affect your nervous system, causing headaches and dizziness. TPH has been found in at least 23 of the 1,467 National Priorities List sites identified by the Environmental Protection Agency (EPA).**

## What are total petroleum hydrocarbons?

(Pronounced tōt'l pə-trō'lē-əm hī'drə-kär'bənz)

Total petroleum hydrocarbons (TPH) is a term used to describe a large family of several hundred chemical compounds that originally come from crude oil. Crude oil is used to make petroleum products, which can contaminate the environment. Because there are so many different chemicals in crude oil and in other petroleum products, it is not practical to measure each one separately. However, it is useful to measure the total amount of TPH at a site.

TPH is a mixture of chemicals, but they are all made mainly from hydrogen and carbon, called hydrocarbons. Scientists divide TPH into groups of petroleum hydrocarbons that act alike in soil or water. These groups are called petroleum hydrocarbon fractions. Each fraction contains many individual chemicals.

Some chemicals that may be found in TPH are hexane, jet fuels, mineral oils, benzene, toluene, xylenes, naphthalene, and fluorene, as well as other petroleum products and gasoline components. However, it is likely that samples of TPH will contain only some, or a mixture, of these chemicals.

## What happens to TPH when it enters the environment?

- TPH may enter the environment through accidents, from industrial releases, or as byproducts from commercial or private uses.
- TPH may be released directly into water through spills or leaks.
- Some TPH fractions will float on the water and form surface films.
- Other TPH fractions will sink to the bottom sediments.
- Bacteria and microorganisms in the water may break down some of the TPH fractions.
- Some TPH fractions will move into the soil where they may stay for a long time.

## How might I be exposed to TPH?

- Everyone is exposed to TPH from many sources.
- Breathing air at gasoline stations, using chemicals at home or work, or using certain pesticides.
- Drinking water contaminated with TPH.
- Working in occupations that use petroleum products.
- Living in an area near a spill or leak of petroleum products.
- Touching soil contaminated with TPH.

ToxFAQs Internet address via WWW is <http://www.atsdr.cdc.gov/toxfaq.html>

### How can TPH affect my health?

Some of the TPH compounds can affect your central nervous system. One compound can cause headaches and dizziness at high levels in the air. Another compound can cause a nerve disorder called "peripheral neuropathy," consisting of numbness in the feet and legs. Other TPH compounds can cause effects on the blood, immune system, lungs, skin, and eyes.

Animal studies have shown effects on the lungs, central nervous system, liver, and kidney from exposure to TPH compounds. Some TPH compounds have also been shown to affect reproduction and the developing fetus in animals.

### How likely is TPH to cause cancer?

The International Agency for Research on Cancer (IARC) has determined that one TPH compound (benzene) is carcinogenic to humans. IARC has determined that other TPH compounds (benzo[a]pyrene and gasoline) are probably and possibly carcinogenic to humans. Most of the other TPH compounds are considered not to be classifiable by IARC.

### Is there a medical test to show whether I've been exposed to TPH?

There is no medical test that shows if you have been exposed to TPH. However, there are methods to determine if you have been exposed to some TPH compounds. Exposure to kerosene can be determined by its smell on the breath or clothing. Benzene can be measured in exhaled air and a breakdown product of benzene can be measured in urine. Other TPH compounds can be measured in blood, urine, breath, and some body tissues.

### Has the federal government made recommendations to protect human health?

There are no regulations or advisories specific to TPH. The following are recommendations for some of the TPH fractions and compounds:

The EPA requires that spills or accidental releases into the environment of 10 pounds or more of benzene be reported to the EPA.

The Occupational Safety and Health Administration has set an exposure limit of 500 parts of petroleum distillates per million parts of air (500 ppm) for an 8-hour workday, 40-hour workweek.

### Glossary

Carcinogenicity: Ability to cause cancer.

CAS: Chemical Abstracts Service.

Immune system: Body organs and cells that fight disease.

Pesticides: Chemicals used to kill pests.

### References

Agency for Toxic Substances and Disease Registry (ATSDR). 1999. Toxicological profile for total petroleum hydrocarbons (TPH). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

**Where can I get more information?** For more information, contact the Agency for Toxic Substances and Disease Registry, Division of Toxicology, 1600 Clifton Road NE, Mailstop F-32, Atlanta, GA 30333. Phone: 1-888-422-8737, FAX: 770-488-4178. ToxFAQs Internet address via WWW is <http://www.atsdr.cdc.gov/toxfaq.html> ATSDR can tell you where to find occupational and environmental health clinics. Their specialists can recognize, evaluate, and treat illnesses resulting from exposure to hazardous substances. You can also contact your community or state health or environmental quality department if you have any more questions or concerns.



**San Francisco Bay Regional Water Quality Control Board**

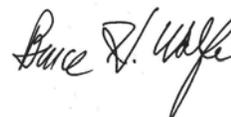
**Order No. R2-2012-0060  
NPDES No. CAG912004**

**GENERAL WASTE DISCHARGE REQUIREMENTS FOR:  
Discharge or Reuse of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting  
from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering  
Requiring Treatment (Groundwater General Permit)**

**Table 1. Administrative Information**

This Order was adopted by the Regional Water Quality Control Board on:	<b>August 8, 2012</b>
This Order shall become effective on:	<b>August 8, 2012</b>
This Order shall expire on:	<b>August 9, 2017</b>
Place and Regulatory Measure ID Nos.	<b>778700 and 383919</b>
The U.S. Environmental Protection Agency (USEPA) and the Regional Water Quality Control Board have classified the discharges under this General National Pollutant Discharge Elimination System (NPDES) Permit as minor discharges based on the discharges' impacts to receiving water bodies.	
To obtain coverage under this General Permit, dischargers must submit a Notice of Intent (NOI) Form as described in Attachment B and a filing fee equivalent to the first year's annual fee. If the NOI is complete, Authorization to Initiate Discharge will be issued by the Regional Water Quality Control Board Executive Officer.	
Authorized Dischargers who need to continue discharging after the expiration date of this Order shall file a completed NOI form no later than 180 days in advance of this Order's expiration date. Such Dischargers for which coverage is extended will become subject to the new Order upon authorization by the Executive Officer.	

I, Bruce H. Wolfe, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on the date indicated above.



Digitally signed  
by Bruce Wolfe  
Date:  
2012.08.13  
16:32:36 -07'00'

Bruce H. Wolfe, Executive Officer

JOHN MULLER, CHAIR | BRUCE H. WOLFE, EXECUTIVE OFFICER

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- Attachment B – Notice of Intent Application Form and Instructions
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- Attachment D – Standard Provisions
- Attachment E – Monitoring and Reporting Program
- Attachment F – Fact Sheet

## I. SCOPE OF GENERAL PERMIT

Facilities that may be covered under this Order are groundwater discharges (typically long term) that fall under one of the three categories in I.A., below, and not otherwise covered by municipal stormwater permits or other applicable NPDES permits. This Order covers discharges from these facilities to all surface waters such as creeks, streams, rivers including flood control canals, lakes, or San Francisco Bay. Such discharges may occur directly to surface waters or through constructed storm drain systems.

A. The three discharge categories are as follows:

1. Aquifer reclamation program well discharges;
2. Reverse osmosis (RO) concentrate from aquifer reclamation program well discharges to estuarine receiving waters; and,
3. Structural dewatering discharges of greater than 10,000 gallons per day and requiring treatment, for pollutants other than fuels and volatile organic compounds, before discharging. (This does not include treatment required for contamination by fuels or volatile organic compounds because such dischargers must seek coverage under a separate general permit, VOC Fuel General Permit No. CAG912002.)

B. Examples of typical discharges to be covered by this permit are provided in Findings II.D.1 through 3, below. Specific facility information for each discharge is required in the Notice of Intent (NOI) Form submitted for that discharge (see Attachment B). Any discharger proposing similar discharges at multiple sites may be covered under one discharge authorization letter subject to the approval of the Regional Water Board Executive Officer on a case-by-case basis. Each outfall will be subject to individual fees.

## II. FINDINGS

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter, the Regional Water Board), finds:

A. **Background.** In April 2007, the Regional Water Board adopted Order No. R2-2007-0033, NPDES Permit No. CAG912004, General Waste Discharge Requirements for Discharge or Reuse of Extracted Brackish Groundwater and Reverse Osmosis Concentrate Resulting from Treatment of Groundwater by Reverse Osmosis and Discharge or Reuse of Extracted and Treated Groundwater Resulting from Structural Dewatering. Order No. R2-2007-0033 included the three discharge categories explained in I.A.1 through 3, above.

B. From July 2007 to June 2012, the Executive Officer authorized 41 discharges pursuant to Order No. R2-2007-0033. Out of these 41 discharges, 12 discharges were under category 1, 1 discharge under category 2, and 28 discharges under category 3.

- C. As of January 3, 2012, the Regional Water Board received notices of termination for 13 discharges and NOIs for 28 discharges. Out of these 28 discharges, 11 discharges are under category 1, 1 discharge under category 2, and 16 discharges under category 3.

For the purposes of this Order, references to the “Discharger” or “permittee” in applicable federal and State laws, regulations, plans, or policy are held to be equivalent to references to the Discharger(s) herein.

- D. **Facility Description(s).** This Order regulates discharges to surface waters from the following sources:

1. Aquifer reclamation program well discharges (typically long term): this consists of extracted groundwater discharges related to protecting, reclaiming, and restoring groundwater quality impacted by, or the possible occurrence of, salinity intrusion.
2. RO concentrate from aquifer reclamation program well discharges to estuarine environments (typically long term): pumped groundwater may be treated by RO so that less saline groundwater may be returned to the drinking water supply and the RO concentrate discharged as waste. RO concentrate discharges to sanitary sewer systems, or that are regulated under a sanitary agency's pretreatment program, are not required to seek coverage under this Order.
3. Long-term structural dewatering of greater than 10,000 gallons per day and requiring treatment for pollutants other than fuels or volatile organic compounds: these are long-term dewatering systems under or around buildings and pipelines to control groundwater infiltration. Buildings and underpass structures are two examples of structures that may require continuous dewatering. Treatment is required where a physical, biological, or chemical treatment process is necessary in order for the structural dewatering discharge to comply with the prohibitions and limitations of this Order. The target of treatment may include naturally-occurring compounds (e.g., sulfides, alkalinity, acidity) that, if not treated, would pollute or contribute to pollution of surface receiving waters. This Order does not cover groundwater that requires treatment due to contamination from fuels or volatile organic compounds. Such discharges must seek coverage under a separate general permit, VOC Fuel General Permit No. CAG912002. This Order requires Dischargers to provide in the NOI (Attachment B) a complete description of the treatment system installed at each facility, if any, and the pollutants that the system will remove.

- E. **Legal Authorities.** This Order is issued pursuant to Clean Water Act (CWA) section 402 and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA) and chapter 5.5, division 7 of the California Water Code (CWC) (commencing with section 13370). It shall serve as a NPDES permit for point source discharges from each facility regulated under this Order to surface waters. This Order also serves as General Waste Discharge Requirements (GWDRs) pursuant to CWC article 4, chapter 4, division 7 of the Water Code (commencing with section 13260).

States may request authority to issue general NPDES permits pursuant to title 40 of the Code of Federal Regulations (40 CFR) section 122.28. On June 8, 1989, the State Water Resources Control Board (State Water Board) submitted an application to the USEPA requesting revisions to its NPDES Program in accordance with 40 CFR 122.28, 123.62, and 403.10. The application included a request to add general permit authority to its approved NPDES Program. On September 22, 1989, USEPA Region 9 approved the State Water Board's request and granted authorization for the State to issue general NPDES permits.

- F. Background and Rationale for Requirements.** The Regional Water Board developed the requirements in this Order based on information submitted as part of NOIs, through monitoring and reporting programs, and other available environmental information. The Fact Sheet (Attachment F), which contains background information and rationale for Order requirements, is hereby incorporated into this Order and constitutes part of the Findings for this Order. Attachments A through E and G are also incorporated into this Order.
- G. California Environmental Quality Act (CEQA).** Under CWC section 13389, this action to adopt an NPDES permit is exempt from Chapter 3 of CEQA.
- H. Technology-based Effluent Limitations.** CWA section 301(b) and NPDES regulations at 40 CFR 122.44 requires that permits include conditions meeting applicable technology-based requirements, at a minimum, and any more stringent effluent limitations necessary to meet applicable water quality standards. Technology-based effluent limitations have not been established by USEPA for the types of discharges authorized by this Order.
- I. Water Quality-Based Effluent Limitations (WQBELs).** CWA section 301(b) and NPDES regulations at 40 CFR 122.44(d) require that permits include limitations more stringent than applicable federal technology-based requirements where necessary to achieve applicable water quality standards. NPDES regulations at 40 CFR 122.44(d)(1)(i) mandate that permits include effluent limitations for all pollutants that are or may be discharged at levels that have the reasonable potential to cause or contribute to an exceedance of a water quality standard, including numeric and narrative objectives within a standard. Where reasonable potential has been established for a pollutant, but there is no numeric criterion or objective for the pollutant, WQBELs must be established using: (1) USEPA criteria guidance under CWA section 304(a), supplemented where necessary by other relevant information; (2) on an indicator parameter for the pollutant of concern; or (3) using a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting the state's narrative criterion, supplemented with other relevant information, as provided in 40 CFR 122.44(d)(1)(vi).
- J. Water Quality Control Plans.** The *Water Quality Control Plan for the San Francisco Bay Basin* (Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives (WQOs) for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve WQOs. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Board, the Office of Administrative Law, and USEPA.

The Basin Plan states that the beneficial uses of any specifically identified water body generally apply to its tributary streams. The Basin Plan may not specifically identify beneficial uses for every receiving water regulated under this Order, but may identify present and potential uses for the downstream water body, to which the receiving water, via an intermediate water body, is a tributary. These potential and existing beneficial uses are municipal and domestic supply, fish migration and fish spawning, industrial service supply, navigation, industrial process supply, marine habitat, agricultural supply, estuarine habitat, groundwater recharge, shellfish harvesting, water contact and non-contact recreation, ocean, commercial, and sport fishing, wildlife habitat, areas of special biological significance, cold freshwater and warm freshwater habitat, and preservation of rare and endangered species for surface waters and municipal and domestic supply, industrial service supply, industrial process supply, agricultural supply, and freshwater replenishment for groundwaters. In addition, the Basin Plan implements State Water Board Resolution No. 88-63, which established State policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply. Requirements of this Order implement the Basin Plan.

On September 18, 1975, the State Water Board adopted the *Water Quality Control Plan for Control of Temperature in the Coastal Interstate Waters and Enclosed Bays and Estuaries of California* (hereinafter the Thermal Plan). The Thermal Plan contains objectives governing cooling water discharges, providing different and specific numeric and narrative water quality objectives for new and existing discharges.

The State Water Board's *Water Quality Control Plan for Enclosed Bays and Estuaries—Part 1, Sediment Quality* became effective on August 25, 2009. This plan supersedes other narrative sediment quality objectives and establishes new sediment quality objectives and related implementation provisions for specifically defined sediments in most bays and estuaries.

- K. National Toxics Rule (NTR) and California Toxics Rule (CTR).** USEPA adopted the NTR on December 22, 1992, and later amended it on May 4, 1995, and November 9, 1999. About 40 criteria in the NTR apply in California. On May 18, 2000, USEPA adopted the CTR. The CTR promulgated new toxics criteria for California and, in addition, incorporated the previously adopted NTR criteria that were applicable in the State. The CTR was amended on February 13, 2001. These rules contain water quality criteria (WQC) for priority pollutants.
- L. State Implementation Policy.** On March 2, 2000, the State Water Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP). The SIP became effective on April 28, 2000, with respect to the priority pollutant criteria promulgated for California by the USEPA through the NTR and to the priority pollutant objectives established by the Regional Water Board in the Basin Plan. The SIP became effective on May 18, 2000, with respect to the priority pollutant criteria promulgated by the USEPA through the CTR. The State Water Board adopted amendments to the SIP on February 24, 2005, that became effective on July 13, 2005. The SIP establishes implementation provisions for priority pollutant criteria and objectives and provisions for chronic toxicity control. Requirements of this Order implement the SIP.

**M. Recycled Water Policy.** The State Water Board adopted Resolution No. 2009-0011 (*Policy for Water Quality Control for Recycled Water*) on February 3, 2009. The policy is intended to promote sustainable local water supplies by increasing the acceptance and promoting the use of recycled water. It sets a goal of increasing recycled water use statewide by at least one million acre feet per year by 2030. The policy also requires Regional Water Boards to exercise their authority to the fullest extent possible to encourage recycled water use and to develop watershed-based salt and nutrient management plans to ensure that groundwater resources are not degraded by recycled water use.

**N. Alaska Rule.** On March 30, 2000, USEPA revised its regulation that specifies when new and revised state and tribal water quality standards (WQS) become effective for CWA purposes. [40 CFR 131.21; 65 Fed. Reg. 24641 (April 27, 2000)] Under the revised regulation (also known as the Alaska Rule), new and revised standards submitted to USEPA after May 30, 2000, must be approved by USEPA before being used for CWA purposes. The final rule also provides that standards already in effect and submitted to USEPA by May 30, 2000, may be used for CWA purposes, whether or not approved by USEPA.

**O. Stringency of Requirements for Individual Pollutants.** This Order contains both technology-based and water quality-based effluent limitations (TBELs and WQBELs, respectively) for individual pollutants. Derivation of these limitations is discussed in the Fact Sheet (Attachment F.) This Order's technology-based pollutant restrictions on pH and chlorine residual implement the minimum applicable federal technology-based requirements and meet requirements of the Basin Plan.

WQBELs have been derived to implement WQOs that protect beneficial uses. Both the beneficial uses and the WQOs have been approved pursuant to federal law and are the applicable federal water quality standards. To the extent that toxic pollutants WQBELs were derived from the CTR, the CTR is the applicable standard pursuant to 40 CFR 131.38. The procedure for calculating individual WQBELs for priority pollutants is based on the SIP. Most beneficial uses and WQOs contained in the Basin Plan were approved under State law and submitted to and approved by USEPA. Any WQOs and beneficial uses submitted to USEPA prior to May 30, 2000, but not approved by USEPA before that date, are nonetheless "applicable water quality standards for the purposes of the CWA" pursuant to 40 CFR 131.21(c)(1).

**P. Antidegradation Policy.** NPDES regulations at 40 CFR 131.12 require that state water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16, which incorporates the federal antidegradation policy where the federal policy applies under federal law and requires that existing quality of waters be maintained unless degradation is justified based on specific findings. The Basin Plan implements, and incorporates by reference, both the State and federal antidegradation policies.

**Q. Anti-Backsliding Requirements.** CWA sections 402(o)(2) and 303(d)(4) and 40 CFR 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit be as stringent as those in the previous permit, with some

exceptions where limitations may be relaxed. This Order retains effluent limitations no less stringent than those established by previous order.

- R. Endangered Species Act.** This Order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code sections 2050 to 2097) or the federal Endangered Species Act (16 U.S.C.A. sections 1531 to 1544). This Order requires compliance with effluent limits, receiving water limits, and other requirements to protect the beneficial uses of waters of the State. Dischargers are responsible for meeting all requirements of applicable State and federal law pertaining to threatened and endangered species.
- S. Monitoring and Reporting.** NPDES regulations at 40 CFR 122.48 require that all NPDES permits specify requirements for recording and reporting monitoring results. CWC sections 13267 and 13383 authorize the Regional Water Board to require technical and monitoring reports. The Monitoring and Reporting Program establishes monitoring and reporting requirements to implement federal and State requirements. This Monitoring and Reporting Program is provided in Attachment E.
- T. Standard and Special Provisions.** Standard Provisions, which apply to all NPDES permits in accordance with 40 CFR section 122.41, and additional conditions applicable to specified categories of permits in accordance with 40 CFR 122.42 and as modified for this Order, are provided in Attachment D. Dischargers must comply with all standard provisions and with those additional conditions that are applicable under 40 CFR 122.42. Dischargers must also comply with the Regional Standard Provisions provided in Attachment G. The Regional Water Board has also included in this Order special provisions applicable to the Dischargers. The Fact Sheet (Attachment F) provides rationale for the special provisions contained in this Order.
- U. Provisions and Requirements Implementing State Law.** The provisions/requirements in subsections IV.C (Reclamation Specifications) and V.B (Groundwater Limitations) of this Order are included to implement State law only. These provisions/requirements are not required or authorized under the federal CWA; consequently, violations of these provisions/requirements are not subject to the enforcement remedies that are available for NPDES violations.
- V. Notification of Interested Parties.** The Regional Water Board notified the Dischargers and interested agencies and persons of its intent to prescribe GWDRs for the discharge and has provided them with an opportunity to submit their written comments and recommendations. The Fact Sheet (Attachment F) provides details of the notification.
- W. Consideration of Public Comment.** The Regional Water Board, in a public meeting, heard and considered all comments pertaining to the discharge. The Fact Sheet (Attachment F) provides details of the public hearing.

IT IS HEREBY ORDERED, that this Order supersedes Order No. R2-2007-0033, except for enforcement purposes, and in order to meet the provisions contained in CWC Division 7 (commencing with section 13000) and regulations adopted thereunder, and the provisions of the federal CWA and regulations and guidelines adopted thereunder, the Dischargers shall comply with the requirements in this Order.

### III. DISCHARGE PROHIBITIONS

- A. The discharge of extracted groundwater or RO concentrate of groundwater is prohibited unless an NOI application for the proposed discharge has been submitted and the Executive Officer has provided the Discharger with an Authorization to Discharge. The discharge of extracted groundwater or RO concentrate of groundwater at a location or in a manner different from that authorized by the Authorization to Discharge is prohibited.
- B. The discharge of extracted groundwater or RO concentrate in excess of the flow rate specified by the Executive Officer in the Authorization to Discharge is prohibited unless an increase in the flow rate is approved by the Executive Officer.
- C. Neither the treatment nor the discharge of pollutants shall create a pollution, contamination, or nuisance, as defined by CWC section 13050.
- D. Discharges to a storm drain shall not cause scouring or erosion at the point where the storm drain discharges into the receiving water, and shall not cause or contribute to scouring of banks, excessive sedimentation, or flooding of the storm drain system or receiving water downstream of the point of discharge.
- E. Discharges of filter backwash water, membrane cleaning solutions, or other waste streams resulting from or associated with the treatment of uncontaminated brackish groundwater by RO and not described as RO concentrate are prohibited.
- F. Discharges of drilling fluids are prohibited.
- G. Discharges of groundwater contaminated with volatile organic compounds (VOC) or fuels are prohibited. Dischargers with VOC or fuels contamination must obtain coverage under the VOC Fuel General Permit, NPDES permit No. CAG912002.
- H. In case of structural dewatering requiring treatment before discharging, bypass or overflow of untreated or partially treated groundwater to waters of the State either at the treatment system or from any of the collection or transport systems or pump stations tributary to the treatment system is prohibited, except as provided for in the conditions stated in section I.G of Attachment D.

### IV. EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

#### A. Effluent Limitations (Surface Water Discharges Only)

1. **Residual Chlorine:** There shall be no detectable levels of residual chlorine in the effluent (a non-detect result using a detection level equal or less than 0.05 milligram per liter will not be

deemed to be out of compliance). This limit only applies to Dischargers that chlorinate their well water.

**2. pH:** The pH of the discharge shall not exceed 8.5 nor be less than 6.5.

**3. Acute Toxicity:**

- a. Representative samples of the effluent, with compliance measured at Monitoring Location EFF-001 as described in the Authorization to Discharge, shall meet the following limits for acute toxicity. Bioassays shall be conducted in compliance with Section V.A of the Monitoring and Reporting Program (MRP) (Attachment E).

The survival of test fish in 96-hour static renewal bioassays with the effluent shall be not less than a three sample moving median of 90% survival and a single test value of not less than 70% survival.

- b. These acute toxicity limitations are further defined as follows:

(1) 3-sample median. A bioassay test showing survival of less than 90 percent represents a violation of this effluent limit, if one or more of the past two or less bioassay tests show less than 90 percent survival.

(2) Single sample. A bioassay test showing survival of less than 70 percent represents a violation of this effluent limit.

- c. Bioassays shall be performed using the most up-to-date USEPA protocol. Bioassays shall be conducted using rainbow trout as the test species in compliance with *Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms*, currently 5<sup>th</sup> Edition (EPA-821-R-02-012), with exceptions granted to the Discharger by the Executive Officer and the Environmental Laboratory Accreditation Program (ELAP) upon the Discharger's request with justification.

**B. Discharge Specifications**

All authorized Dischargers shall conduct receiving water, effluent monitoring, and/or special studies as specified in the MRP (Attachment E) and compare analytical results with the triggers described in Provisions VI.C.6. These triggers are not effluent limitations. Exceedances to triggers, however, do lead to additional requirements, which are designed to mitigate potential adverse impacts and to determine if discharges continue to be suitable for coverage under this Order. All Dischargers shall adhere to applicable procedures, described by Provision VI.C.6.

**C. Reclamation Specification and Land Discharge Specifications**

- 1. Reuse Policy:** The Regional Water Board adopted Resolution No. 88-160 on October 19, 1988. The Resolution urges dischargers of extracted groundwater from site cleanup projects to reclaim their effluent and that when reclamation is not technically and/or economically feasible, to discharge to a publicly owned treatment works (POTW). If neither reclamation nor discharge to a POTW is technically or economically feasible and if beneficial uses of the

receiving water are not adversely affected, it is the intent of the Regional Water Board to authorize the discharge of treated extracted groundwater in accordance with the requirements of this Order.

- 2. Reuse Allowed:** This Order permits reuse or reclamation of extracted or extracted and treated groundwater in conjunction with the discharge to surface water, except for purposes of recharge or reinjection. Reuse of extracted or extracted and treated groundwater can take many forms, such as irrigation of landscaping or agriculture, dust control or soil compaction on construction sites, and industrial water supply.
- 3. Water Reclamation Specifications (Water Reuse Only)**
  - a. Water reclaimed for beneficial reuse shall meet the requirements in Section IV.A - Effluent Limitations.
  - b. Water reclamation activities shall be described in the Discharger's NOI, including the method of any additional treatment and the location and type of water reuse.
  - c. Reclaimed water shall not be allowed to escape from the authorized use area by airborne spray, from conveyance facilities, or by surface flow, except in minor amounts associated with good irrigation practice.
  - d. Reclamation involving irrigation shall not occur when the ground is saturated.
  - e. The use of reclaimed water shall not impair the quality of waters of the State, nor shall it create a nuisance as defined by CWC section 13050(m).
  - f. Adequate measures shall be taken to minimize public contact with reclaimed water and to prevent the breeding of flies, mosquitoes, and other vectors of public health significance during the process of reuse.
  - g. Appropriate public warnings must be posted to advise the public that the water is not suitable for drinking. Signs must be posted in the area, and all reclaimed water valves and outlets appropriately labeled.
  - h. There shall be no cross-connection between the potable-water supplies and piping containing extracted or extracted treated groundwater intended for reuse.
  - i. Water reclamation consisting of recharge or reinjection is not authorized under this Order.
- 4. Land Discharge Specifications:** This Order permits limited land discharges of groundwater in conjunction with the discharge to surface water, except for purposes of significant recharge or reinjection. In general, the specifications in Section IV.C.3 also apply to land discharges.

## V. RECEIVING WATER LIMITATIONS

### A. Surface Water Limitations

Discharges shall not cause the following in surface receiving waters:

1. The discharge of waste shall not cause the following conditions to exist in waters of the State at any place:
  - a. Floating, suspended, or deposited macroscopic particulate matter or foam;
  - b. Bottom deposits or aquatic growths to the extent that such deposits or growths cause nuisance or adversely affect beneficial uses;
  - c. Alteration of temperature, turbidity, or apparent color beyond present natural background levels;
  - d. Visible, floating, suspended, or deposited oil or other products of petroleum origin; and
  - e. Toxic or other deleterious substances to be present in concentrations or quantities that cause deleterious effects on aquatic biota, wildlife, or waterfowl, or render any of these unfit for human consumption either at levels created in the receiving waters or as a result of biological concentration.
  
2. The discharge of waste shall not cause the following limits to be exceeded in waters of the State in any place within one foot of the water surface:
  - a. Dissolved oxygen:
 

<u>For all tidal waters:</u>	
	In the Bay downstream of Carquinez Bridge - 5.0 mg/L minimum
	Upstream of Carquinez Bridge - 7.0 mg/L minimum
<u>For nontidal waters:</u>	
	Waters designated as cold water habitat - 7.0 mg/L minimum
	Waters designated as warm water habitat - 5.0 mg/L minimum
<u>For all inland surface waters:</u>	
	The median dissolved oxygen concentration for any three consecutive months shall not be less than 80% of the dissolved oxygen content at saturation. When natural factors cause concentrations less than that specified above, the discharge shall not cause further reduction in ambient dissolved oxygen concentrations.

- d. Dissolved Sulfide                      Natural background levels
- e. pH:    The pH shall not be depressed below 6.5 nor raised above 8.5, nor caused to vary from normal ambient pH by more than 0.5 pH units. In receiving waters that are naturally alkaline, the discharge shall not cause changes greater than 0.5 units in background ambient pH levels.
- f. Un-ionized Ammonia                      0.025 mg/L as an annual median; 0.16 mg/L as a maximum for Central Bay and upstream; 0.4 mg/L as a maximum for Lower Bay.
- g. Nutrients                                      Waters shall not contain biostimulatory substances in concentrations that promote aquatic growths to the extent that such growths cause nuisance or adversely affect beneficial uses.
- h. Turbidity                                      The discharges shall not cause the following:

Receiving Water	Limit
Dry creek	≥ 50 NTU
< 50 NTU	< 5 NTU incremental increase above background
≥ 50 NTU	< 10 percent increase above background

- 3. Discharges shall not cause or contribute to a violation of any applicable water quality standard for receiving waters adopted by the Regional Water Board or the State Water Board as required by the CWA and regulations adopted there under. If more stringent applicable water quality standards are promulgated or approved pursuant to CWA section 303, or amendments thereto, the Regional Water Board will revise and modify this Order in accordance with such more stringent standards.

**B. Groundwater Limitations**

Discharges shall not cause violations of Basin Plan water quality standards for receiving groundwaters with existing and potential beneficial uses of municipal and domestic supply, industrial water supply, industrial process water supply, agricultural water supply, and/or freshwater replenishment to surface water (see Table 2 numerical triggers in Column A which are protective of municipal and domestic supply, agricultural water supply, and freshwater).

**VI. PROVISIONS**

**A. Standard Provisions**

Dischargers shall comply with federal Standard Provisions included in Attachment D of this Order.

## **B. Monitoring and Reporting Program Requirements**

1. Dischargers shall comply with the Monitoring and Reporting Program (Attachment E), and future revisions thereto, including applicable sampling and reporting requirements in the standard provisions listed in VI.A, above.
2. Dischargers authorized under this permit may be required to comply with additional monitoring requirements. The Executive Officer will specify such additional monitoring requirements in the Authorization to Discharge letter. Examples of additional monitoring that could be required are listed below:
  - a. Monitoring in response to a complaint received about a Facility authorized to discharge under this permit,
  - b. Stormwater monitoring,
  - c. Dioxins and furans monitoring,
  - d. Regional Monitoring Program (RMP) monitoring,
  - e. Additional discharge observations, and
  - f. Additional effluent and ambient priority pollutant scans.

## **C. Special Provisions**

### **1. Reopener Provisions**

The Regional Water Board may modify or reopen this Order prior to its expiration date in any of the following circumstances as allowed by law:

- a. If present or future investigations demonstrate that the discharges governed by this Order have or will have a reasonable potential to cause or contribute to, or will cease to have, adverse impacts on water quality or beneficial uses of the receiving waters.
- b. If new or revised WQOs or total maximum daily loads (TMDLs) come into effect for the San Francisco Bay Estuary and contiguous water bodies (whether Statewide, regional, or site-specific). In such cases, effluent limitations in this Order will be modified as necessary to reflect updated WQOs and waste load allocations in TMDLs. Adoption of effluent limitations contained in this Order is not intended to restrict in any way future modifications based on legally adopted WQOs or TMDLs, or as otherwise permitted under federal regulations governing NPDES permit modifications.
- c. If State Water Board precedential decisions, new policies, new laws, or new regulations on chronic toxicity or total chlorine residual become available. For example, pursuant to CWC section 13170.3, the State Water Board will establish water quality objectives and effluent limitations that are specifically appropriate to brackish groundwater treatment system facilities that produce municipal water supplies for local use.
- d. If an administrative or judicial decision on a separate NPDES permit or WDRs addresses requirements similar to this discharge.

- e. The Discharger may request permit modification based on any of the circumstances described above. In any such request, the Discharger shall include an antidegradation and anti-backsliding analysis.
  - f. Or as otherwise authorized by law.
2. **NOI or Modified NOI Application.** The NOI or Modified NOI application for each point of proposed discharge to a storm drain system shall contain the information required in the NOI Application as explained in attachments B and C of this Order and as may be amended by the Executive Officer.
3. **NOI Review.** Upon receipt of a complete NOI application package for proposed discharge, the Executive Officer will review the application to determine whether the proposed Discharger is eligible to discharge waste under this Order. The application package shall document that the proposed treatment system and associated operation, maintenance, and monitoring plans are capable of ensuring that the discharge will meet the provisions, prohibitions, effluent limitations, and receiving water limitations of this Order.
4. **Discharge Authorization and Termination.** If the Executive Officer determines that the proposed Discharger is eligible to discharge waste under this Order, the Executive Officer will issue an Authorization to Discharge for the proposed discharge. Any Discharger proposing similar discharges at multiple sites may be covered under one discharge authorization letter subject to the approval of the Executive Officer on a case-by-case basis. Each outfall will be subject to individual fees. After notice and opportunity for a hearing, coverage of an individual discharge under this Order may be terminated or modified for cause, including but not limited to, the following:
- a. Violation of any term or condition of this Order;
  - b. In obtaining coverage under this Order, misrepresentation or failure to disclose all relevant facts; and
  - c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

The discharge authorization may be terminated by the Executive Officer at any time.

5. **Non-Compliance Is A Violation.** Upon receipt of the Executive Officer's discharge authorization, the Discharger(s) shall comply with all applicable conditions and limitations of this Order and its attachments. Any permit noncompliance (violations of requirements in this Order or Monitoring Program) constitutes a violation of the CWA and the CWC and is grounds for enforcement action, permit or authorization termination, revocation and reissuance, modification, the issuance of an individual permit, or denial of a renewal application.
6. **Triggers.** The following triggers in Table 2 are not effluent limitations and must not be construed as such. Instead, the triggers are levels above which additional investigation is

required to determine further action and to determine whether a numeric effluent limitation for a particular constituent is necessary. The authorization issued to each Discharger will indicate which trigger column is applicable to that specific discharge. If any constituent in the discharge exceeds the corresponding trigger as listed in Table 2, below, the Discharger shall take monthly influent and effluent samples for three consecutive months for each exceeded constituent and conduct activities as required in Provisions VI.C.7 or VI.C.8. If additional monitoring has already been completed, the Discharger shall summarize the results including a description of plans underway to address the previous exceedance, such as details of source elimination, changes in operation of existing treatment units, or the re-design of any treatment unit.

**Table 2. Trigger Pollutants**

Pollutant	Chemical Abstract Service (CAS) Number	Column A Trigger for discharges to freshwater bodies with municipal and domestic supply, agricultural water supply, and/or freshwater replenishment beneficial uses (µg/L) <sup>[1],[2]</sup>	Column B Trigger for discharges to Bay/Estuary (See Note 2) (µg/L) <sup>[1],[2]</sup>
Turbidity (Units)		5	---
Total Dissolved Solids (TDS)		500,000	---
Conductivity (mmhoms/cm)		200	---
Chloride		142,000	---
Total Solids (TS) - TDS		30,000	30,000
Antimony	7440360	6	4,300
Arsenic	7440382	10	36
Beryllium	7440417	4	---
Cadmium	7440439	2.2	2.2
Chromium (total)	18540299	11	11
Chromium (VI)	18540299	11 <sup>[3]</sup>	11
Copper <sup>[4]</sup>	7440508	20	5.9
Copper <sup>[5]</sup>	7440508	12	3.4
Copper <sup>[6]</sup>	7440508	17	4.7
Lead	7439921	2.5	2.5
Mercury	7439976	0.025	0.025
Nickel <sup>[4]</sup>	7440020	100	30
Nickel <sup>[5]</sup>	7440020	80	13
Nickel <sup>[6]</sup>	7440020	100	19
Selenium	7782492	5.0	5.0
Silver	7440224	3.4	1.9
Thallium	7440280	1.7	6.3
Zinc	7440666	120	81
Cyanide	57125	5.2	2.9
Asbestos	1332214	7 MFibers/L	---
2,3,7,8-TCDD (Dioxin)	1746016	1.3E-08	1.4E-08
Acrylonitrile	107131	0.059	0.66
Bromoform	75252	4.3	360
Chlorodibromomethane	124481	0.401	34
Dichlorobromomethane	75274	0.56	46
1,2-Dichloropropane	78875	0.52	39
1,3-Dichloropropylene	542756	0.5	1,700
1,1,2,2-Tetrachloroethane	79345	0.17	11
Pentachlorophenol	87865	0.28	7.9
2,4,6-Trichlorophenol	88062	2.1	6.5
Benzidine	92875	0.00012	0.00054
Benzo(a)anthracene	56553	0.0044	0.049
Benzo(a)pyrene	50328	0.0044	0.049
Benzo(b)fluoranthene	205992	0.0044	0.049
Benzo(k)fluoranthene	207089	0.0044	0.049

<b>Pollutant</b>	<b>Chemical Abstract Service (CAS) Number</b>	<b>Column A Trigger for discharges to freshwater bodies with municipal and domestic supply, agricultural water supply, and/or freshwater replenishment beneficial uses (µg/L)<sup>[1],[2]</sup></b>	<b>Column B Trigger for discharges to Bay/Estuary (See Note 2) (µg/L)<sup>[1],[2]</sup></b>
Bis(2-chloroethyl)ether	111444	0.031	1.4
Bis(2-ethylhexyl)phthalate	117817	1.8	5.9
Chrysene	218019	0.0044	0.049
Dibenzo(a,h)anthracene	53703	0.0044	0.049
3,3'-Dichlorobenzidine	91941	0.04	0.077
2,4-Dinitrotoluene	121142	0.11	9.1
1,2-Diphenylhydrazine	122667	0.04	0.54
Hexachlorobenzene	118741	0.00075	0.00077
Hexachlorobutadiene	87683	0.44	50
Hexachloroethane	67721	1.9	8.9
Indeno(1,2,3-c,d)pyrene	193395	0.0044	0.049
N-nitrosodimethylamine	62759	0.00069	8.1
N-nitrosodi-n-propylamine	621647	0.005	1.4
Aldrin	309002	0.00013	0.00014
alpha-BHC	319846	0.0039	0.013
beta-BHC	319857	0.014	0.046
gamma-BHC	58899	0.019	0.063
Chlordane	57749	0.00057	0.00059
4,4-DDT	50393	0.00059	0.00059
4,4-DDE	72559	0.00059	0.00059
4,4-DDD	72548	0.00083	0.00084
Dieldrin	60571	0.00014	0.00014
alpha-Endosulfan	959988	0.0087	0.0087
beta-Endosulfan	33213659	0.0087	0.0087
Endrin	72208	0.036	0.0023
Endrin aldehyde	7421934	0.76	0.81
Heptachlor	76448	0.00021	0.00021
Heptachlor epoxide	1024573	0.00010	0.00011
PCBs, sum	1336363	0.00017	0.00017
Toxaphene	8001352	0.0002	0.0002
Odor-Threshold (Units)	---	3	---
Sulfate	---	250,000	---
Foaming Agents	---	500	---
Color (Units)	---	15	---
Aluminum	---	5,000	---
Boron	---	500	---
Cobalt	---	50	---
Fluoride	---	1,000	---
Iron	---	300	---
Lithium	---	2,500	---
Manganese	---	50	---
Molybdenum	---	10	---
Nitrate (as NO3)	---	45,000	---
Nitrate + Nitrite (as N) NO3 + NO2 (as N)	---	5,000	---
Nitrite (as N)	---	1,000	---
Vanadium	---	100	---
Combined Radium-226 and Radium 228 (in pCi/l)	---	5	---
Gross Alpha Particle (includes Radium-226 but excludes Radon and Uranium) (in pCi/l)	---	15	---
Tritium (in pCi/l)	---	20,000	---
Strontium-90 (in pCi/l)	---	8	---
Gross Beta Particle Activity (in pCi/l)	---	50	---
Uranium (in pCi/l)	---	20	---
Fuels Related Pollutants and Solvents	---	Apply for NPDES No CAG912002	

Pollutant	Chemical Abstract Service (CAS) Number	Column A Trigger for discharges to freshwater bodies with municipal and domestic supply, agricultural water supply, and/or freshwater replenishment beneficial uses (µg/L) <sup>[1],[2]</sup>	Column B Trigger for discharges to Bay/Estuary (See Note 2) (µg/L) <sup>[1],[2]</sup>
Related Pollutants			
Table Notes: [1] Units are in µg/L unless noted otherwise right after the name of pollutant [2] If a discharger is reporting non-detect monitoring data with a reporting level higher than the trigger, the reason for the higher detection level shall be consistent with Appendix 4 of the SIP (Minimum Levels) and must be explained within the monitoring report. Please refer to the Regional Water Board web site for the latest version of SIP. [3] If total chromium concentration exceeds 11 µg/L, then analysis for chromium (VI) shall also be conducted. [4] Applicable to Suisun Bay and San Pablo Bay segments of San Francisco Bay. [5] Applicable to Central Bay and Lower Bay segments of San Francisco Bay [6] Applicable to South San Francisco Bay, south of Hayward Shoals.			

7. **Triggers Case 1:** If the results of all three additional discharge samples **do not** exceed the triggers, the Discharger shall report the results in the next Monitoring Report, and shall return to the schedule of sampling and analysis in the MRP (Attachment E).
8. **Triggers Case 2:** If the results of **any one of the three** additional discharge samples exceed the triggers, the Discharger shall investigate the source (e.g., comparing influent and discharge sample results) and investigate source control and/or treatment options for each triggered pollutant. The Discharger shall document its progress on these efforts in the Annual Self-Monitoring Report required by section IX.B of the MRP (Attachment E). Until the Executive Officer determines that the “triggered pollutants” investigation is complete, the Discharger must implement the following monitoring schedule for the triggered pollutants:
- a. In case of a triggered inorganic pollutant; the Discharger shall accelerate monitoring of the discharge to quarterly and provide information, updated annually, confirming that pollutant source is background and explain the reasons why treatment of that pollutant is not feasible. Specifically, the annual monitoring reports shall include site-specific background groundwater concentrations, types of treatment available, and costs of treatment systems for each triggered inorganic pollutant, and
  - b. In case of a triggered organic pollutant; the Discharger shall accelerate monitoring of the effluent to every two weeks and provide information, updated annually, confirming the reason(s) why that pollutant could not be treated to the level not exceeding the trigger for that pollutant.
9. The Executive Officer may require the Discharger to perform additional investigations or take additional actions if the Discharger: (1) exceeds a trigger value for the same pollutant and confirms (Trigger Case 2 above) the exceedance greater than two times in one calendar year; and (2) is not pursuing resolution of trigger exceedances in a timely fashion in the judgment of the Executive Officer. These two trigger exceedances do not include the data collected to verify the trigger (i.e., effluent data collected to confirm the trigger exceedance). These conditions are also grounds for termination of the Authorization to Discharge.

- 10. Individual NPDES Permit May Be Required.** The USEPA Administrator may request the Executive Officer to require any Discharger authorized to discharge waste by this Order to apply for and obtain an individual NPDES permit. The Executive Officer may require any Discharger authorized to discharge waste by this Order to apply for and obtain an individual NPDES permit. Cases where an individual NPDES permit may be required include the following:
- a. The Discharger is not in compliance with the conditions of this Order or as authorized by the Executive Officer;
  - b. A change has occurred in the availability of demonstrated technology or practices for the control or abatement of pollutants applicable to the point source;
  - c. Effluent limitation guidelines are promulgated for point sources covered by this Order; or
  - d. A water quality control plan containing requirements applicable to such point sources is approved.
- 11. Treatment Reliability.** Dischargers shall, at all times, retain a professional engineer certified in the State of California to oversee the design, and operation and maintenance of the treatment system to properly operate and maintain all facilities that are used by the Dischargers to achieve compliance with this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. All of these procedures shall be described in an Operation and Maintenance (O&M) Manual. Dischargers shall keep in a state of readiness all systems necessary to achieve compliance with the conditions of this Order. All systems, both those in service and reserve, shall be inspected and maintained on a regular basis. Records shall be kept of the tests (e.g., analytical or treatment system tests) and made available to the Regional Water Board for at least five years. Additional requirements for compliance with this provision are explained in Attachment B of the Order.
- 12. No Preemption.** This Order permits the discharge of uncontaminated extracted groundwater, extracted and treated groundwater, and RO concentrate resulting from treatment of uncontaminated extracted groundwater by RO, to waters of the State subject to the prohibitions, effluent limitations, and provisions of this Order. It does not pre-empt or supersede the authority of municipalities, flood control agencies, or other local agencies to prohibit, restrict, or control discharges of waste to storm drain systems or other watercourses subject to their jurisdiction. For example, this Order provides no water or groundwater rights and does not preempt the authority of any local or state agencies as relates to water rights.

## VII. COMPLIANCE DETERMINATION

Compliance with the effluent limitations contained in Section IV of this Order will be determined as specified below:

### A. General

Compliance with effluent limitations for priority pollutants shall be determined using sample reporting protocols defined in the MRP and Attachment A of this Order. For purposes of reporting and administrative enforcement by the Regional and State Water Boards, the Discharger shall be deemed out of compliance with effluent limitations if the concentration of the priority pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the reporting level (RL).

## **B. Multiple Sample Data**

When determining compliance with an AMEL **or** MDEL for priority pollutants and more than one sample result is available, the Discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of “Detected, but Not Quantified” (DNQ) or “Not Detected” (ND). In those cases, the Discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:

1. The data set shall be ranked from low to high, ranking the reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant.
2. The median value of the data set shall be determined. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the middle unless one or both of the points are ND or DNQ, in which case the median value shall be the lower of the two data points where DNQ is lower than a value and ND is lower than DNQ.

**ATTACHMENT A – ACRONYMS AND DEFINITIONS****Acronyms**

AMEL	Average Monthly Effluent Limitation
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
BPJ	Best Professional Judgment
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CIWQS	California Integrated Water Quality System
CTR	California Toxics Rule
CV	Coefficient of Variation
CWA	Federal Clean Water Act
CWC	California Water Code
DNQ	Detected, but Not Quantified
DO	Dissolved oxygen
ECA	Effluent Concentration Allowance
EFF	Effluent
GWDRs	General Waste Discharge Requirements
MDEF	Maximum Daily Effluent Limitation
MDL	Method Detection Limit
mg/L	Milligram per Liter
ML	Minimum Level
ND	Not Detected
NTR	National Toxics Rule
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
POTW	Publicly Owned Treatment Work
RL	Reporting Level
RMP	Regional Monitoring Program
RO	Reverse Osmosis
RPA	Reasonable Potential Analysis
SIP	State Implementation Policy
SSTs	Site-Specific Translators
TMDL	Total Maximum Daily Load
µg/L	Microgram per Liter
USEPA	U.S. Environmental Protection Agency
VOC	Volatile Organic Compounds
WQO	Water Quality Objective
WQS	Water Quality Standard

## Definitions

**Arithmetic Mean ( $\mu$ )**, also called the average, is the sum of measured values divided by the number of samples. For ambient water concentrations, the arithmetic mean is calculated as follows:

$$\text{Arithmetic mean} = \mu = \Sigma x / n \quad \text{where: } \Sigma x \text{ is the sum of the measured ambient water concentrations, and } n \text{ is the number of samples.}$$

**Average Monthly Effluent Limitation (AMEL)** is the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

**Bioaccumulative** pollutants are those substances taken up by an organism from its surrounding medium through gill membranes, epithelial tissue, or from food and subsequently concentrated and retained in the body of the organism.

**Carcinogenic** pollutants are substances that are known to cause cancer in living organisms.

**Coefficient of Variation (CV)** is a measure of the data variability and is calculated as the estimated standard deviation divided by the arithmetic mean of the observed values.

**Detected, but Not Quantified (DNQ)** are those sample results less than the RL, but greater than or equal to the laboratory's MDL.

**Dilution Credit** is the amount of dilution granted to a discharge in the calculation of a water quality-based effluent limitation, based on the allowance of a specified mixing zone. It is calculated from the dilution ratio or determined through conducting a mixing zone study or modeling of the discharge and receiving water.

**Duly Authorized Representative** is one whose:

- a. Authorization is made in writing by a principal executive officer or ranking elected official;
- b. Authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as general partner in a partnership, sole proprietor in a sole proprietorship, the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company (A duly authorized representative may thus be either a named individual or any individual occupying a named position).

**Effluent Concentration Allowance (ECA)** is a value derived from the water quality criterion/objective, dilution credit, and ambient background concentration that is used, in conjunction with the coefficient of variation for the effluent monitoring data, to calculate a long-term average (LTA) discharge concentration. The ECA has the same meaning as waste load allocation (WLA) as used in USEPA guidance (Technical Support Document For Water Quality-based Toxics Control, March 1991, second printing, EPA/505/2-90-001).

**Estimated Chemical Concentration** is the estimated chemical concentration that results from the confirmed detection of the substance by the analytical method below the ML value.

**Field Blank** is defined as an individual sample demonstrated to be free from the contaminants of interest and other potentially interfering substances, and treated as a sample in all respects, including exposure to grab-sampling site conditions, storage, preservation, and all analytical procedures. The purpose of the field blank is to determine if the field or sample transporting procedures and environments have contaminated the sample.

**Flow Sample** is defined as the accurate measurement of the average daily flow volume using a properly calibrated and maintained flow-measuring device.

**Grab Sample** is defined as an individual sample collected in a short period of time not exceeding 15 minutes. Grab samples shall be collected during normal peak loading conditions for the parameter of interest, which may or may not be during hydraulic peaks. It is used primarily in determining compliance with maximum daily limits and average monthly limits. Grab samples represent only the condition that exists at the time the wastewater is collected.

**Instantaneous Maximum Effluent Limitation** is the highest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous maximum limitation).

**Instantaneous Minimum Effluent Limitation** is the lowest allowable value for any single grab sample or aliquot (i.e., each grab sample or aliquot is independently compared to the instantaneous minimum limitation).

**Maximum Daily Effluent Limitation (MDEL)** means the highest allowable daily discharge of a pollutant, over a calendar day (or 24-hour period). For pollutants with limitations expressed in units of mass, the daily discharge is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the daily discharge is calculated as the arithmetic mean measurement of the pollutant over the day.

**Median** is the middle measurement in a set of data. The median of a set of data is found by first arranging the measurements in order of magnitude (either increasing or decreasing order). If the number of measurements ( $n$ ) is odd, then the median =  $X_{(n+1)/2}$ . If  $n$  is even, then the median =  $(X_{n/2} + X_{(n/2)+1})/2$  (i.e., the midpoint between the  $n/2$  and  $n/2+1$ ).

**Method Detection Limit (MDL)** is the minimum concentration of a substance that can be measured and reported with 99 percent confidence that the analyte concentration is greater than zero, as defined in title 40 of the Code of Federal Regulations, Part 136, Attachment B, revised as of July 3, 1999.

**Minimum Level (ML)** is the concentration at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method specified sample weights, volumes, and processing steps have been followed.

**Not Detected (ND)** are those sample results less than the laboratory's MDL.

**Ocean Waters** are the territorial marine waters of the State as defined by California law to the extent these waters are outside of enclosed bays, estuaries, and coastal lagoons. Discharges to ocean waters are regulated in accordance with the State Water Board's California Ocean Plan.

**Quality Assurance Officer** is a qualified individual who was not otherwise involved in sample collection, transport, or analysis to investigate the cause of data error.

**Persistent Pollutants** are substances for which degradation or decomposition in the environment is nonexistent or very slow.

**Reporting Level (RL)** is the ML (and its associated analytical method) chosen by the Discharger for reporting and compliance determination from the MLs included in this Order. The MLs included in this Order correspond to approved analytical methods for reporting a sample result that are selected by the Regional Water Board either from Appendix 4 of the SIP in accordance with section 2.4.2 of the SIP or established in accordance with section 2.4.3 of the SIP. The ML is based on the proper application of method-based analytical procedures for sample preparation and the absence of any matrix interferences. Other factors may be applied to the ML depending on the specific sample preparation steps employed. For example, the treatment typically applied in cases where there are matrix-effects is to dilute the sample or sample aliquot by a factor of ten. In such cases, this additional factor must be applied to the ML in the computation of the RL.

**Source of Drinking Water** is any water designated as municipal or domestic supply (MUN) in a Regional Water Board Basin Plan.

**Standard Deviation ( $\sigma$ )** is a measure of variability that is calculated as follows:

$$\sigma = \left( \frac{\sum[(x - \mu)^2]}{(n - 1)} \right)^{0.5}$$

where:

x is the observed value;

$\mu$  is the arithmetic mean of the observed values; and

n is the number of samples.

**Toxicity Reduction Evaluation (TRE)** is a study conducted in a step-wise process designed to identify the causative agents of effluent or ambient toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in toxicity. The first steps of the TRE consist of the collection of data relevant to the toxicity, including additional toxicity testing, and an evaluation of facility operations and maintenance practices, and best management practices. A Toxicity Identification Evaluation (TIE) may be required as part of the TRE, if appropriate. (A TIE is a set of procedures to identify the specific chemical(s) responsible for toxicity. These procedures are performed in three phases (characterization, identification, and confirmation) using aquatic organism toxicity tests.)

**ATTACHMENT B – NOTICE OF INTENT (NOI) APPLICATION FORM**

**Complete and submit this NOI to receive Authorization or Reauthorization to Discharge or Reuse of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering Requiring Treatment under the requirements of NPDES Permit No. CAG912004 (Groundwater General Permit)**

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the design engineer whose signature and engineering license number is documented in this notice, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\_\_\_\_\_  
Name (print)

\_\_\_\_\_  
Signature and Date

\_\_\_\_\_  
Title/Organization

\_\_\_\_\_  
Address

**This Application is for the Groundwater Treatment Facility located at:**

\_\_\_\_\_

**This NOI form and all required attachments shall be submitted to Farhad Azimzadeh by e-mail at [fazimzadeh@waterboards.ca.gov](mailto:fazimzadeh@waterboards.ca.gov). If electronic submittal is not possible, applicants may submit the NOI package to the following address: California Regional Water Quality Control Board, San Francisco Bay Region, located at 1515 Clay Street, Suite 1400, Oakland, California 94612. **Please include a check for \$1,943, or current fee amount, payable to the State Water Resources Control Board.****

**Table B-1. Mark only one as applicable**

<b>1</b>	<b>This is a new discharge.</b>	
<b>2</b>	<b>This discharge is currently authorized under this Order (No. R2-2012-0060), which requires authorized dischargers who need to continue discharging after August 9, 2017, to file a completed NOI form no later than February 10, 2017.</b>	
<b>3</b>	<b>This discharge is currently authorized under this Order, and this Form is submitted for the modification of the current Authorization to Discharge.</b>	
<b>4</b>	<b>This discharge is currently authorized under this Order, and this Form is submitted to report change of the Professional Engineer responsible for the groundwater treatment system (the new Professional Engineer shall affix his/her signature and engineering license number to a new certification report attached to this Form).</b>	

**Table B-2. Mark only one discharge category as applicable**

<b>Category 1</b>	Aquifer reclamation program well discharges.	
<b>Category 2</b>	RO concentrate from aquifer reclamation program well discharges.	
<b>Category 3</b>	Structural dewatering discharges greater than 10,000 gallons per day and requiring treatment. Treatment is required where a physical, biological, or chemical treatment process is necessary in order for the structural dewatering discharge to comply with the prohibitions and limitations of this order.	

**Table B-3. Mark or provide information as applicable**

<b>1</b>	I have contacted the local sanitary sewer agency serving the above address and determined that discharging to the local sanitary sewer system is not a feasible option.	
<b>2</b>	I have contacted the local agencies having jurisdiction over the use of the storm drain system or watercourse and informed them about this proposed discharge.	
<b>3</b>	Approximately, what percentage of the total effluent is reused or will be reused?	%

**Table B-4. Facility and Professional Engineer(s) information**

<b>1</b>	Facility Name Discharger Name Discharger's Contact Person Name, Address, Phone number, and Email Address	
<b>2</b>	Authorized Person to Sign & Submit Reports	
<b>3</b>	Billing Information Contact Person Name, Address, Phone number, and Email Address	
<b>4</b>	Design Professional Engineer's Name, California License Number, Address, Phone Number, and Email Address	
<b>5</b>	Operation and Maintenance (O&M) Professional Engineer's Name, California License Number, Address, Phone Number, and Email Address A copy of the PE certification approving the O&M manual including a copy of O&M manual table of contents must be attached to this application	
<b>6</b>	Professional Engineer has designed the capacity of groundwater treatment system in gallons per minute (gpm) for:	gpm
<b>7</b>	Professional Engineer recommends operating the groundwater treatment system with a flow not exceeding:	gpm
<b>8</b>	Professional Engineer certification report including flow schematics showing every components of the treatment system is attached to this application (the Professional Engineer shall affix his/her signature and engineering license number to this certification report).	
<b>9</b>	In case of using rental equipment in the treatment system, the Professional Engineer shall extend the certification in line 8 above to cover any rental equipment.	
<b>10</b>	Watershed Refer to the State of California Watershed Browser located online at <a href="http://www.conservation.ca.gov/dlrp/watershedportal/WatershedBrowser/Pages/WatershedBrowser.aspx">www.conservation.ca.gov/dlrp/watershedportal/WatershedBrowser/Pages/WatershedBrowser.aspx</a> or the Guide to San Francisco Bay Area Creeks located online at <a href="http://museumca.org/creeks/index.html">http://museumca.org/creeks/index.html</a> .	
<b>11</b>	Aerial Map Please list the complete path of the Discharge and highlight the complete Discharge path in an attached aerial map (e.g., the discharge would travel about quarter of a mile	

	inside a storm drain system before reaching a river (provide the name of the river), and then would travel two miles in the creek before reaching the Bay).	
12	<b>Beneficial Uses of Receiving Water(s)</b> Is this Discharge to freshwater bodies with municipal and domestic supply, agricultural water supply, and/or freshwater replenishment beneficial uses? If yes, please list the beneficial uses (for a list of beneficial uses, please refer to the Chapter 2 of the Water Quality Control Plan (Basin Plan) for the San Francisco Bay Basin at <a href="http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#basinplan">http://www.waterboards.ca.gov/sanfranciscobay/basin_planning.shtml#basinplan</a> .	
13	Brief Project Description and Tentative Completion Date (if applicable)	
14	<b>Modified NOI</b> - I understand that for any significant changes, I need to submit a modified NOI. Examples of significant changes are changing the treatment system or responsible Professional Engineer, an increase in discharge flow rates, or a change in discharge location.	
15	<b>Expiration Date</b> - I understand this authorization letter expires on August 9, 2017, the expiration date of Order No. R2-2012-0060 and if I need to continue discharging after that date, I must file an NOI application no later than February 10, 2017.	

**Table B-5. Treatment System Description**

	Unit	Number	Further Description (size, capacity, location and function) If Applicable
1	Extraction Well(s)		
2	Extraction Wells with Dedicated Treatment Unit(s)		
3	Dedicated Treatment Unit(s)		
4	Settling Tank(s) in series		
5	Settling Tank(s) in parallel		
6	Oil/Water Separator(s)		
7	Filter(s)		
8	Air Strippers with Air Filters		
9	Air Strippers without Air Filters		
10	Oxygenation Treatment Unit(s)		
11	Advanced Treatment Unit(s)		
12	Liquid-phase Granular Activated Carbon (GAC) Vessel(s) in Series		
13	GAC Vessel(s) in Parallel		
14	De-chlorination Unit (applies to Dischargers that chlorinate their well water)		
15	Effluent reuse infrastructure (If so, provide additional detail)		
16	Effluent land discharge infrastructure (If so, provide additional detail)		
17	Energy Dissipater System		
18	Other Treatment Systems		
19	Other BMPs (e.g., range of the RO facility blending ratio)		
20	Bay-edge Groundwater Dewatering for Landfills - dischargers shall provide full description that the Groundwater Dewatering facility is completely separate from the landfill leachate collection system.		

**Table B-6. Discharge location information**

Discharge Point Location	Discharge Point Latitude	Discharge Point Longitude	Receiving Water
Influent Monitoring Point(s)	° ' "	° ' "	
Effluent Monitoring Point(s)	° ' "	° ' "	
Storm-Drain Location (if applicable):	° ' "	° ' "	Storm-Drain
Outfall Location:	° ' "	° ' "	
Upstream Receiving Water Monitoring Location (RSW-001U)			At a point 50 feet upstream from the point of discharge into the receiving water, or if access is limited, at the first point upstream which is accessible.
Downstream Receiving Water Monitoring Location (RSW-001D)			At a point 50 feet downstream from the point of discharge into the receiving water, or if access is limited, at the first point downstream which is accessible.

**Table B-7. List of pollutants (For new and existing discharges. For existing discharges, complete one table for influent and one for effluent.)**

**New Discharge, or Effluent for Existing Discharge**

Monitoring data since effective date of the initial discharge authorization letter or estimated from groundwater monitoring data for new discharges	Pollutant 1	Pollutant 2	Pollutant 3	Add Columns and/or tables as needed (all detected pollutants with effluent limitations and all triggered pollutants exceeding the triggers shall be listed in this table)
Number of Samples				
Maximum Concentration				
Average Concentration (average of detected pollutants only)				
Number of times the effluent limitation was exceeded				
Median Concentration				
Minimum Concentration				
Number of Non-Detects				
Lowest Reporting Limit				
Highest Reporting Limit				
Number of Samples with Lowest Reporting Limit				
Most recent sample Date, Method Number				

Note: The Regional Water Board may modify this form at any time to reflect any new fees and other needed improvements as applicable.

**Influent for Existing Discharge**

Monitoring data since effective date of the initial discharge authorization letter or estimated from groundwater monitoring data for new discharges	Pollutant 1	Pollutant 2	Pollutant 3	Add Columns and/or tables as needed (all detected pollutants with effluent limitations and all triggered pollutants exceeding the triggers shall be listed in this table)
Number of Samples				
Maximum Concentration				
Average Concentration (average of detected pollutants only)				
Number of times the effluent limitation was exceeded				
Median Concentration				
Minimum Concentration				
Number of Non-Detects				
Lowest Reporting Limit				
Highest Reporting Limit				
Number of Samples with Lowest Reporting Limit				
Most recent sample Date, Method Number				

Note: The Regional Water Board may modify this form at any time to reflect any new fees and other needed improvements as applicable.

**ATTACHMENT C – NOTICE OF TERMINATION**

**Complete and Submit to Request Termination of Coverage under the Requirements of General Waste Discharge Requirements for Discharge or Reuse of Extracted Brackish Groundwater, Reverse Osmosis Concentrate Resulting from Treated Brackish Groundwater, and Extracted Groundwater from Structural Dewatering Requiring Treatment**

**NPDES PERMIT NO. CAG912004  
 (Groundwater General Permit)**

For the Groundwater Treatment Facility located at:

\_\_\_\_\_

Type or Print Facility Address above the line

\_\_\_\_\_

CIWQS Place Identification Number

A PDF electronic copy of this Form shall be submitted to **Farhad Azimzadeh by e-mail at [fazimzadeh@waterboards.ca.gov](mailto:fazimzadeh@waterboards.ca.gov)**.

**Table 1. The Following Discharge Category is Terminated (check only one as applicable)**

<b>Category 1</b>	Aquifer reclamation program well discharges.	
<b>Category 2</b>	RO concentrate from aquifer reclamation program well discharges.	
<b>Category 3</b>	Structural dewatering discharges greater than 10,000 gallons per day and requiring treatment. Treatment is required where a physical, biological, or chemical treatment process is necessary in order for the structural dewatering discharge to comply with the prohibitions and limitations of this order.	

I, the Discharger, certify under penalty of law that this notice is prepared under my direction or supervision and last/final date of this discharge was \_\_\_\_\_. I am aware that discharging without a discharge authorization is in violation of the California Water Code.

\_\_\_\_\_

Name (print)

\_\_\_\_\_

Signature and Date

\_\_\_\_\_

Title/Organization (Discharger’s Organization)

\_\_\_\_\_

Address, email, and phone number

Note: The Regional Water Board may modify this form at any time to reflect the new requirements and other needed improvements.

**ATTACHMENT D –STANDARD PROVISIONS****I. STANDARD PROVISIONS – PERMIT COMPLIANCE****A. Duty to Comply**

1. The Discharger must comply with all of the conditions of this Order. Any noncompliance constitutes a violation of the Clean Water Act (CWA) and the California Water Code and is grounds for enforcement action, for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (40 CFR § 122.41(a).)
2. The Discharger shall comply with effluent standards or prohibitions established under Section 307(a) of the CWA for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if this Order has not yet been modified to incorporate the requirement. (40 CFR § 122.41(a)(1).)

**B. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a Discharger in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Order. (40 CFR § 122.41(c).)

**C. Duty to Mitigate**

The Discharger shall take all reasonable steps to minimize or prevent any discharge in violation of this Order that has a reasonable likelihood of adversely affecting human health or the environment. (40 CFR § 122.41(d).)

**D. Proper Operation and Maintenance**

The Discharger shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Discharger to achieve compliance with the conditions of this Order. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems that are installed by a Discharger only when necessary to achieve compliance with the conditions of this Order. (40 CFR § 122.41(e).)

**E. Property Rights**

1. This Order does not convey any property rights of any sort or any exclusive privileges. (40 CFR § 122.41(g).)
2. The issuance of this Order does not authorize any injury to persons or property or invasion of other private rights, or any infringement of state or local law or regulations (40 CFR § 122.5(c)).

## F. Inspection and Entry

The Discharger shall allow the Regional Water Board, State Water Board, United States Environmental Protection Agency (USEPA), and/or their authorized representatives (including an authorized contractor acting as their representative), upon the presentation of credentials and other documents, as may be required by law, to (40 CFR § 122.41(i); Wat. Code, § 13383):

1. Enter upon the Discharger's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this Order (40 CFR § 122.41(i)(1));
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order (40 CFR § 122.41(i)(2));
3. Inspect and photograph, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order (40 CFR § 122.41(i)(3)); and
4. Sample or monitor, at reasonable times, for the purposes of assuring Order compliance or as otherwise authorized by the CWA or the Water Code, any substances or parameters at any location. (40 CFR § 122.41(i)(4).)

## G. Bypass

1. Definitions
  - a. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility. (40 CFR § 122.41(m)(1)(i).)
  - b. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities, which causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production. (40 CFR § 122.41(m)(1)(ii).)
2. Bypass of extracted groundwater. During a dewatering project, the Discharger may allow any bypass of uncontaminated extracted groundwater to occur which originates from uncontaminated extraction well(s). The Discharger shall monitor the water quality of these extractions wells to confirm that the extracted water remains uncontaminated. The Discharger may also allow any bypass to occur which does not cause exceedances of effluent limitation, but only if it is for essential maintenance to assure efficient operation. In this case, weekly monitoring results of pollutants of concern shall be reported in the quarterly monitoring reports.
3. Prohibition of bypass. Bypass is prohibited, and the Regional Water Board may take enforcement action against a Discharger for bypass, unless (40 CFR § 122.41(m)(4)(i)):

- a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage (40 CFR § 122.41(m)(4)(i)(A));
  - b. There were no feasible alternatives to the bypass, such as turning off the extraction wells pump(s), discharge to a POTW, retention of untreated wastes, maintenance during normal periods of equipment downtime, or the use of auxiliary treatment facilities. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventive maintenance (40 CFR § 122.41(m)(4)(i)(B)); and
  - c. The Discharger submitted notice to the Regional Water Board as required under Standard Provisions – Permit Compliance I.G.5 below. (40 CFR § 122.41(m)(4)(i)(C).)
4. The Regional Water Board may not take enforcement action against a Discharger for bypass, if the Regional Water Board determines that the three conditions listed in Standard Provisions – Permit Compliance I.G.3 above have been met. (40 CFR § 122.41(m)(4)(ii).)
5. Notice
    - a. Anticipated bypass of uncontaminated extracted groundwater. If the Discharger knows in advance of the need for a bypass of uncontaminated extracted groundwater, it shall submit the necessary information in the initial or modified Notice of Intent, if possible at least 45 days before the date of the bypass. The necessary information includes but not limited to the name and number of extraction wells, flow rates for each well, the distance to other contaminated wells, and monitoring data such as turbidity, color, conductivity, pH, temperature, metals, TPH, VOC, SVOC, PAHs, Oxygenates.
    - b. Unanticipated bypass. The Discharger shall submit notice of an unanticipated bypass as required in Standard Provisions - Reporting V.E below (24-hour notice). (40 CFR § 122.41(m)(3)(ii).)

## H. Upset

Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the Discharger. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation. (40 CFR § 122.41(n)(1).)

1. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of Standard Provisions – Permit Compliance I.H.2 below are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review. (40 CFR § 122.41(n)(2)).

2. Conditions necessary for a demonstration of upset. A Discharger who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence that (40 CFR § 122.41(n)(3)):
  - a. An upset occurred and that the Discharger can identify the cause(s) of the upset (40 CFR § 122.41(n)(3)(i));
  - b. The permitted facility was, at the time, being properly operated (40 CFR § 122.41(n)(3)(ii));
  - c. The Discharger submitted notice of the upset as required in Standard Provisions – Reporting V.E.2.b below (24-hour notice) (40 CFR § 122.41(n)(3)(iii)); and
  - d. The Discharger complied with any remedial measures required under Standard Provisions – Permit Compliance I.C above. (40 CFR § 122.41(n)(3)(iv).)
3. Burden of proof. In any enforcement proceeding, the Discharger seeking to establish the occurrence of an upset has the burden of proof. (40 CFR § 122.41(n)(4).)

## II. STANDARD PROVISIONS – PERMIT ACTION

### A. General

This Order may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Discharger for modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any Order condition. (40 CFR § 122.41(f).)

### B. Duty to Reapply

If the Discharger wishes to continue an activity regulated by this Order after the expiration date of this Order, the Discharger must submit a completed Notice of Intent form (see Attachment B), 180 days in advance of the Order expiration date, to obtain a new permit. (40 CFR § 122.41(b).)

### C. Transfers

Any authorization to discharge issued under this Order is not transferable to any person except after filing a modified Notice of Intent with the Regional Water Board. If the new Discharger has a different professional engineer, the modified Notice of Intent shall be revised accordingly.\

## III. STANDARD PROVISIONS – MONITORING

- A. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. (40 CFR § 122.41(j)(1).)
- B. Monitoring results must be conducted according to test procedures under 40 CFR Part 136 or other test procedures specified in this Order. (40 CFR § 122.41(j)(4); § 122.44(i)(1)(iv).)

## IV. STANDARD PROVISIONS – RECORDS

**A.** The Discharger shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Order, and records of all data used to complete the application for this Order, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Regional Water Board Executive Officer at any time (40 CFR § 122.41(j)(2).)

**B. Records of monitoring information shall include:**

1. The date, exact place, and time of sampling or measurements (40 CFR § 122.41(j)(3)(i));
2. The individual(s) who performed the sampling or measurements (40 CFR § 122.41(j)(3)(ii));
3. The date(s) analyses were performed (40 CFR § 122.41(j)(3)(iii));
4. The individual(s) who performed the analyses (40 CFR § 122.41(j)(3)(iv));
5. The analytical techniques or methods used (40 CFR § 122.41(j)(3)(v)); and
6. The results of such analyses. (40 CFR § 122.41(j)(3)(vi).)

**C. Claims of confidentiality for the following information will be denied (40 CFR § 122.7(b)):**

1. The name and address of any permit applicant or Discharger (40 CFR § 122.7(b)(1)); and
2. Permit applications and attachments, permits and effluent data. (40 CFR § 122.7(b)(2).)

**V. STANDARD PROVISIONS – REPORTING**

**A. Duty to Provide Information**

The Discharger shall furnish to the Regional Water Board, State Water Board, or USEPA within a reasonable time, any information which the Regional Water Board, State Water Board, or USEPA may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order or to determine compliance with this Order. Upon request, the Discharger shall also furnish to the Regional Water Board, State Water Board, or USEPA copies of records required to be kept by this Order. (40 CFR § 122.41(h); California Water Code (CWC), § 13267.)

**B. Signatory and Certification Requirements**

1. All applications, reports, or information submitted to the Regional Water Board, State Water Board, and/or USEPA shall be signed and certified in accordance with Standard Provisions – Reporting V.B.2, V.B.3, V.B.4, and V.B.5 below. (40 CFR § 122.41(k).)
2. All permit applications shall be signed by a responsible person as explained below:
  - a. **For a corporation.** All permit applications shall be signed by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means: (i) A

- president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. (40 CFR § 122.22(a)(1).)
- b. **For a partnership or sole proprietorship.** All permit applications shall be signed by a general partner or the proprietor, respectively. (40 CFR § 122.22(a)(2).)
- c. **For a municipality, State, federal, or other public agency.** All permit applications shall be signed by either a principal executive officer or ranking elected official. For purposes of this provision, a principal executive officer of a federal agency includes: (i) the chief executive officer of the agency, or (ii) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of USEPA). (40 CFR § 122.22(a)(3).)
3. All reports required by this Order and other information requested by the Regional Water Board, State Water Board, or USEPA shall be signed by a person described in Standard Provisions – Reporting V.B.2 above, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
- a. The authorization is made in writing by a person described in Standard Provisions – Reporting V.B.2 above (40 CFR § 122.22(b)(1));
- b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.) (40 CFR § 122.22(b)(2)); and
- c. The written authorization is submitted to the Regional Water Board. (40 CFR § 122.22(b)(3).)
4. If an authorization under Standard Provisions – Reporting V.B.3 above is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Standard Provisions – Reporting V.B.3 above must be submitted to the Regional Water Board and State Water Board prior to

or together with any reports, information, or applications, to be signed by an authorized representative. (40 CFR § 122.22(c).)

5. Any person signing a document under Standard Provisions – Reporting V.B.2 or V.B.3 above shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.” (40 CFR § 122.22(d).)

### **C. Monitoring Reports**

1. Monitoring results shall be reported at the intervals specified in the Monitoring and Reporting Program (Attachment E) in this Order. (40 CFR § 122.22(l)(4).)
2. Monitoring results must be reported on a Discharge Monitoring Report (DMR) form (40 CFR § 122.41(l)(4)(i).) or paper or electronic forms provided or specified by the Regional Water Board or State Water Board.
3. If the Discharger monitors any pollutant more frequently than required by this Order using test procedures approved under Part 136 or as specified in this Order, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or other reporting form specified by the Regional Water Board. (40 CFR § 122.41(l)(4)(ii).)
4. Calculations for all limitations, which require averaging of measurements, shall utilize an arithmetic mean unless otherwise specified in this Order. (40 CFR § 122.41(l)(4)(iii).)

### **D. Compliance Schedules**

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Order, shall be submitted no later than 14 days following each schedule date. (40 CFR § 122.41(l)(5).)

### **E. Twenty-Four Hour Reporting**

1. The Discharger shall report any noncompliance that may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the Discharger becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the Discharger becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to

reduce, eliminate, and prevent reoccurrence of the noncompliance. (40 CFR § 122.41(l)(6)(i).)

2. The following shall be included as information that must be reported within 24 hours under this paragraph (40 CFR § 122.41(l)(6)(ii)):
  - a. Any unanticipated bypass that exceeds any effluent limitation in this Order. (40 CFR § 122.41(l)(6)(ii)(A).)
  - b. Any upset that exceeds any effluent limitation in this Order. (40 CFR § 122.41(l)(6)(ii)(B).)
3. The Regional Water Board may waive the above-required written report under this provision on a case-by-case basis if an oral report has been received within 24 hours. (40 CFR § 122.41(l)(6)(iii).)

#### **F. Planned Changes**

The discharger shall file with the Executive Officer an amended Notice of Intent at least 60 days before making any material change in the character, location, or volume of the discharge. In case of proposing any change of treatment system or operation and maintenance procedures, a professional engineer certified in State of California shall certify the adequacy of the design and/or the procedures. A modified Notice of Intent is required under this provision only when (40 CFR § 122.41(l)(1)) the alteration or addition could significantly change the nature or increase the quantity of pollutants discharged (pollutants regulated or not regulated by this Order). Three examples of significant changes are a change in discharge location, a change of the engineer responsible for the design and/or operation and maintenance of the treatment system, and an increase in discharge flow rates.

#### **G. Anticipated Noncompliance**

The Discharger shall give advance notice to the Regional Water Board or State Water Board of any planned changes in the permitted facility or activity that may result in noncompliance with the requirements in this Order. (40 CFR § 122.41(l)(2).)

#### **H. Other Noncompliance**

The Discharger shall report all instances of noncompliance not reported under Standard Provisions – Reporting V.C, V.D, and V.E above at the time monitoring reports are submitted. The reports shall contain the information listed in Standard Provision – Reporting V.E above. (40 CFR § 122.41(l)(7).)

#### **I. Other Information**

When the Discharger becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Regional Water Board, State Water Board, or USEPA, the Discharger shall promptly submit such facts or information. (40 CFR § 122.41(l)(8).)

**VI. STANDARD PROVISIONS – ENFORCEMENT**

The Regional Water Board is authorized to enforce the terms of this permit under several provisions of the Water Code, including, but not limited to, sections 13385, 13386, and 13387.

**VII. ADDITIONAL PROVISIONS – NOTIFICATION LEVELS****A. Non-Municipal Facilities**

Existing manufacturing, commercial, mining, and silvicultural Dischargers shall notify the Regional Water Board as soon as they know or have reason to believe (40 C.F.R. § 122.42(a)):

1. That any activity has occurred or will occur that would result in the discharge, on a routine or frequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following "notification levels" (40 C.F.R. § 122.42(a)(1)):
  - a. 100 micrograms per liter ( $\mu\text{g/L}$ ) (40 C.F.R. § 122.42(a)(1)(i));
  - b. 200  $\mu\text{g/L}$  for acrolein and acrylonitrile; 500  $\mu\text{g/L}$  for 2,4-dinitrophenol and 2-methyl-4,6-dinitrophenol; and 1 milligram per liter (mg/L) for antimony (40 C.F.R. § 122.42(a)(1)(ii));
  - c. Five (5) times the maximum concentration value reported for that pollutant in the Report of Waste Discharge (40 C.F.R. § 122.42(a)(1)(iii)); or
  - d. The level established by the Regional Water Board in accordance with section 122.44(f). (40 C.F.R. § 122.42(a)(1)(iv).)
2. That any activity has occurred or will occur that would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant that is not limited in this Order, if that discharge will exceed the highest of the following "notification levels" (40 C.F.R. § 122.42(a)(2)):
  - a. 500 micrograms per liter ( $\mu\text{g/L}$ ) (40 C.F.R. § 122.42(a)(2)(i));
  - b. 1 milligram per liter (mg/L) for antimony (40 C.F.R. § 122.42(a)(2)(ii));
  - c. Ten (10) times the maximum concentration value reported for that pollutant in the Report of Waste Discharge (40 C.F.R. § 122.42(a)(2)(iii)); or
  - d. The level established by the Regional Water Board in accordance with section 122.44(f). (40 C.F.R. § 122.42(a)(2)(iv).)

**ATTACHMENT E – MONITORING AND REPORTING PROGRAM**

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## **ATTACHMENT E – MONITORING AND REPORTING PROGRAM**

National Pollutant Discharge Elimination System (NPDES) regulations at 40 CFR 122.48 require that all NPDES permits specify monitoring and reporting requirements. California Water Code (CWC) Sections 13267 and 13383 also authorize the Regional Water Quality Control Board (Regional Water Board) to require technical and monitoring reports. This Monitoring and Reporting Program establishes monitoring and reporting requirements that implement the federal and State regulations.

### **I. GENERAL MONITORING PROVISIONS**

- A.** The Discharger shall comply with this Monitoring and Reporting Program. The Executive Officer may amend this Monitoring and Reporting Program pursuant to 40 CFR 122.62, 122.63, and 124.5.
- B.** The Discharger shall conduct all monitoring in accordance with Attachment D, section III, and all tests must be performed by laboratories certified for the analyses in accordance with the California Water Code Section 13176. Equivalent test methods must be more sensitive than those specified in 40 CFR 136 and must be specified in the permit or in the related discharge authorization letter.

The Discharger shall report with each sample result the Reporting Level (RL) from the Minimum Levels (MLs) listed in Appendix 4 of the State Implementation Policy or SIP ([http://www.waterboards.ca.gov/water\\_issues/programs/state\\_implementation\\_policy/docs/sip2005.pdf](http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf)). When there is more than one ML value for a given substance, the Discharger may select any one of the analytical methods cited in SIP Appendix 4 for compliance determination, or any other method described in 40 CFR part 136 or approved by the USEPA (such as the 1600 series) if authorized by the Regional Water Board Executive Officer. However, the ML must be below the trigger level and water quality objective. If no ML value is below the trigger level and water quality objective, then the method must achieve an ML no greater than the lowest ML value indicated in SIP Appendix 4. All monitoring instruments and equipment shall be properly calibrated and maintained to ensure accuracy of measurements.

- C.** The number and frequency of bypasses and accidental spills shall be recorded.
- D.** A copy of this Order, a complete copy of the Notice of Intent (NOI) filed, documentation of the Authorization to Initiate Discharge received from the Regional Water Board, a full copy of the Operation and Maintenance (O&M) Manual, and any other documents relevant to the operation and maintenance of the treatment facility shall be stored at or near the treatment facility, and made available to the Regional Water Board upon request. Dischargers shall inspect their facilities as frequently as required by the O&M Manual.

### **II. MONITORING LOCATIONS**

The Discharger shall establish the following monitoring locations to demonstrate compliance with the effluent limitations, discharge specifications, and other requirements in this Order:

**Table E-1. Monitoring Station Locations**

<b>Discharge Point Name (if applicable)</b>	<b>Monitoring Location Name</b>	<b>Monitoring Location Description (include Latitude and Longitude when available)</b>
---	INF-001	At a point in the extraction system immediately prior to inflow to the treatment unit.
001	EFF-001	At a point in the discharge line immediately following treatment and before it joins or is diluted by any other waste stream, body of water, or substance.
---	RSW-001U	At a point 50 feet upstream from the point of discharge into the receiving water, or if access is limited, at the first point upstream which is accessible.
---	RSW-001D	At a point 50 feet downstream from the point of discharge into the receiving water, or if access is limited, at the first point downstream which is accessible.
---	REU-001	At a point immediately prior to reuse location; not applicable if effluent is not reused or reclaimed.
---	LDE-001	At a point immediately prior to land discharge; not applicable if land discharge of groundwater is the same as effluent.

### III. INFLUENT MONITORING REQUIREMENTS

For aquifer reclamation program well discharges (Category 1) and RO concentrate discharges (Category 2), no influent monitoring is required by the Order, unless effluent violation trigger constituent values are exceeded in the previous self-monitoring report. In that event, influent monitoring is required as part of an investigation to determine the cause of the exceedance. For structural dewatering discharges (Category 3), influent monitoring is required if recommended by the Professional Engineer in charge of the operation and maintenance of the treatment system.

### IV. EFFLUENT MONITORING REQUIREMENTS

Dischargers shall perform sampling and analyses according to the schedule in Table E-2 for Aquifer Reclamation Program Well Discharges (Category 1); Table E-3 for RO Concentrate Discharges (Category 2); and/or Table E-4 for Structural Dewatering Discharges (Category 3) in accordance with the following conditions:

- A. Samples of effluent shall be collected on days coincident with influent sampling (if applicable).
- B. When any type of bypass occurs, grab samples shall be collected on a daily basis for all constituents at all affected discharge points that have effluent limits for the duration of the bypass.
- C. If the analytical results show violation of any effluent limitation, the Discharger shall take a confirmation effluent sample, together with receiving water samples (see third column of Table E-2) within 24 hours of knowledge of violation of effluent limit. The Discharger must have the confirmation sample analyzed by expedited methods and obtain results within 24 hours of sample collection. If the analytical results are also in violation of the effluent limit,

the Discharger shall terminate the discharge until it has corrected the cause of violation. In this case, both the initial and confirmed results are violations. However, if the confirmation effluent sampling shows compliance, the Regional Water Board will consider only the initial exceedance as a violation.

## **V. WHOLE EFFLUENT ACUTE TOXICITY TESTING REQUIREMENTS**

The Discharger shall monitor acute toxicity at EFF-001 as follows:

- A.** Compliance with the acute toxicity effluent limitations of this Order shall be evaluated by measuring survival of test organisms to 96-hour static renewal bioassays at Monitoring Location EFF-001.
- B.** Test organisms shall be rainbow trout unless the Executive Officer specifies otherwise in writing.
- C.** All bioassays shall be performed according to the most up-to-date protocols in 40 CFR 136m currently in *Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms*, 5<sup>th</sup> Edition.
- D.** If specific identifiable substances in the discharge can be demonstrated by the Discharger as being rapidly rendered harmless upon discharge to the receiving water, compliance with the acute toxicity limitation may be determined after the test samples are adjusted to remove the influence of those substances. Written approval from the Executive Officer must be obtained to authorize such an adjustment.
- E.** Monitoring of the bioassay water shall include, on a daily basis, the following parameters: pH, dissolved oxygen, ammonia, (if toxicity is observed), temperature, hardness, and alkalinity. These results shall be reported. If a violation of acute toxicity requirements occurs, the bioassay test shall be repeated with new fish as soon as practical and shall be repeated until a test fish survival rate of 90 percent or greater is observed. If the control fish survival rate is less than 90 percent, the bioassay test shall be restarted with new fish and shall continue as soon as practical until an acceptable test is completed (i.e., control fish survival rate is 90 percent or greater).

## **VI. RECLAMATION MONITORING REQUIREMENTS**

The Discharger shall monitor effluent for reuse at Monitoring Location REU-001, as shown on the third column of Table E.2 for Category 1 discharges; Table E.3 for Category 2 discharges; and Table E.4 for Category 3 discharges.

## **VII. LAND DISCHARGE MONITORING REQUIREMENTS**

The Discharger shall monitor effluent for land discharge at Monitoring Location LDE-001, as shown on the third column of Table E.2 for Category 1 discharges; Table E.3 for Category 2 discharges; and Table E.4 for Category 3 discharges.

### VIII. RECEIVING WATER AND EFFLUENT MONITORING REQUIREMENTS – SURFACE WATER AND GROUNDWATER

The Discharger shall monitor receiving water at Monitoring Locations RSW-001U and RSW-001D as shown on column four of Table E.2 for Category 1 discharges; Table E.3 for Category 2 discharges; and Table E.4 for Category 3 discharges as follows:

- A. Receiving water sampling shall occur concurrently with effluent sampling.
- B. Receiving water samples shall be collected at each station on each sampling day during the period within 1 hour following low slack water, if relevant. Where sampling at lower slack water period is not practical, sampling shall be performed during higher slack water period. Samples shall be collected within the discharge plume and 50 feet down current of the discharge point so as to be representative, unless otherwise stipulated.
- C. Samples should be collected within one foot below the surface of the receiving water body. Explanation shall be provided in the monitoring report if this specification could not be met.

**Table E-2. Schedule for Sampling, Measurements, and Analysis for Aquifer Reclamation Program Well Discharges (Category 1)**

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001. Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
Type of Sample is "Grab" unless noted otherwise			
Flow Rate	MGD	D (meter or calculation based on time and pump capacity)	--
Acute Whole Effluent Toxicity	% Survival	Y	--
pH	Standard Units	Q	--
Hardness (as CaCO <sub>3</sub> )	mg/L	Y	--
Total Solids	mg/L	Q	--
Total Dissolved Solids	mg/L	Q	--
Temperature	°C	Q	--
Salinity	ppt	Q	--
Turbidity in Nephelometric Turbidity Units (NTU)	NTU	Q	Q
Chlorine (applicable to facilities that treat effluent with chlorine)	mg/L	D	--
Chlorides	mg/L	Q	--
Dissolved Oxygen	mg/L	Q	--
Conductivity	mmhoms/cm	Q	--
Antimony, Total (see note 1)	µg/L	Y	--
Arsenic, Total (see note 1)	µg/L	Y	--
Beryllium, Total (see note 1)	µg/L	Y	--

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001, Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is "Grab" unless noted otherwise</b>			
Cadmium, Total (see note 1)	µg/L	Y	--
Hexavalent Chromium (see note 1)	µg/L	Y	--
Total Chromium (see note 1)	µg/L	Y	--
Copper, Total (see note 1)	µg/L	Y	--
Cyanide, Total (see note 1)	µg/L	Y	--
Lead, Total (see note 1)	µg/L	Y	--
Mercury, Total (see note 1)	µg/L	Y	--
Nickel, Total (see note 1)	µg/L	Y	--
Selenium, Total (see note 1)	µg/L	Y	--
Silver, Total (see note 1)	µg/L	Y	--
Thallium, Total (see note 1)	µg/L	Y	--
Zinc, Total (see note 1)	µg/L	Y	--
Volatile Organic Compounds	µg/L	1/Permit Term from each outfall	--
Semi Volatile Organic Compounds except Polynuclear Aromatic Hydrocarbons	µg/L	1/Permit Term from each outfall	--
Polynuclear Aromatic Hydrocarbons	µg/L	1/Permit Term from each outfall	--
Other Pollutants not listed above but there is evidence to be present in the influent and/or effluent and being treated. Examples are Benzene, Toluene, Ethylbenzene, and/or Total Xylenes, EPA 8020; and Total Petroleum Hydrocarbons as Gasoline and as Diesel, EPA 8015 Modified	µg/L	Q	--
All Applicable Standard Observations (see note 2)	No Units	Quarterly or whenever attending the Facility	Quarterly or whenever sampling the receiving water
<p>Note 1: The Discharger shall appropriately select analytical procedures that will compensate for salinity in the sample matrix. Inorganic compounds samples shall be analyzed for total (unfiltered) constituents with the reporting levels not exceeding the following: 0.002 µg/L for Mercury and 1.0 µg/L for Cyanide. For all other inorganic compounds, the minimum levels shall not exceed the following if Inductively Coupled Plasma Mass Spectrometry (ICP-MS) analytical technique is utilized: 0.25 µg/L for Cadmium and Silver, 1.0 µg/L for Nickel, Thallium and Zinc; 2.0 µg/L for Arsenic and Selenium; and 0.5 µg/L for Antimony, Beryllium; Total Chromium, Copper, and Lead (SIP Appendix 4 Minimum Levels (<a href="http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf">http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf</a>)). If the Discharger exceeds the trigger for mercury of 0.025, the Discharger shall sample and analyze the additional samples using ultra-clean techniques as described in USEPA methods 1669 and 1631 to eliminate the possibility of artifactual contamination of the sample.</p> <p>Note 2: Standard Observations are explained in Provisions IX.C through IX.E of this document.</p>			
<p><b>Definitions:</b>            ug/L = microgram per liter or parts per billion (ppb), g/day = grams per day, gpm = gallons per minute, mg/L = milligram per liter or parts per million (ppm), gpd = gallons per day, MFL = million fibers per liter, GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; ICP = Inductively Coupled Plasma; and ICPMS = Inductively Coupled Plasma/Mass Spectrometry.</p>			
<p><b>Legend:</b>            D: Once each day.            Q: Once each quarter.            Y: Once each year.</p>			

**Table E-3. Schedule for Sampling, Measurements, and Analysis for RO Concentrate Discharges (Category 2)**

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001. Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is "Grab" unless noted otherwise</b>			
Flow Rate	MGD	D (meter or calculation based on time and pump capacity)	--
Acute Whole Effluent Toxicity	% Survival	M/Q	--
pH	Standard Units	M	--
Hardness (as CaCO <sub>3</sub> )	mg/L	Q	--
Total Solids	mg/L	M	--
Total Dissolved Solids	mg/L	M	--
Temperature	°C	Q	--
Salinity	ppt	M	--
Turbidity in Nephelometric Turbidity Unit (NTU)	NTU	M	Q
Chlorine (applicable to facilities that treat effluent with chlorine)	mg/L	D	--
Chlorides	mg/L	M	--
Dissolved Oxygen	mg/L	M	--
Conductivity	mmhoms/cm	M	--
Antimony, Total (see note 1)	µg/L	Q	--
Arsenic, Total (see note 1)	µg/L	Q	--
Beryllium, Total (see note 1)	µg/L	Q	--
Cadmium, Total (see note 1)	µg/L	Q	--
Hexavalent Chromium (see note 1)	µg/L	Q	--
Total Chromium (see note 1)	µg/L	Q	--
Copper, Total (see note 1)	µg/L	Q	--
Cyanide, Total (see note 1)	µg/L	Q	--
Lead, Total (see note 1)	µg/L	Q	--
Mercury, Total (see note 1)	µg/L	Q	--
Nickel, Total (see note 1)	µg/L	Q	--
Selenium, Total (see note 1)	µg/L	Q	--
Silver, Total (see note 1)	µg/L	Q	--
Thallium, Total (see note 1)	µg/L	Q	--
Zinc, Total (see note 1)	µg/L	Q	--
Volatile Organic Compounds	µg/L	1/within the first year	--
Semi Volatile Organic Compounds except Polynuclear Aromatic Hydrocarbons	µg/L	1/within the first year	--

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001, Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is “Grab” unless noted otherwise</b>			
Polynuclear Aromatic Hydrocarbons	µg/L	1/within the first year	--
Other Pollutants not listed above but where there is evidence to be present in the influent and/or effluent and being treated.	µg/L	Q	--
All Applicable Standard Observations (see note 2)	No Units	Quarterly or whenever attending the Facility	Quarterly or whenever sampling the receiving water
<p>Note 1: The Discharger shall appropriately select analytical procedures that will compensate for salinity in the sample matrix. Inorganic compounds samples shall be analyzed for total (unfiltered) constituents with the reporting levels not exceeding the following: 0.002 µg/L for Mercury and 1.0 µg/L for Cyanide. For all other inorganic compounds, the minimum levels shall not exceed the following if Inductively Coupled Plasma Mass Spectrometry (ICP-MS) analytical technique is utilized: 0.25 µg/L for Cadmium and Silver, 1.0 µg/L for Nickel, Thallium and Zinc; 2.0 µg/L for Arsenic and Selenium; and 0.5 µg/L for Antimony, Beryllium; Total Chromium, Copper, and Lead (SIP Appendix 4 Minimum Levels (<a href="http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf">http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf</a>)). If the Discharger exceeds the trigger for mercury of 0.025, the Discharger shall sample and analyze the additional samples using ultra-clean techniques as described in USEPA methods 1669 and 1631 to eliminate the possibility of artifactual contamination of the sample.</p> <p>Note 2: Standard Observations are explained in Provisions IX.C through IX.E of this document.</p>			
<p><u>Definitions:</u> ug/L = microgram per liter or parts per billion (ppb), g/day = grams per day, gpm = gallons per minute, mg/L = milligram per liter or parts per million (ppm), gpd = gallons per day, MFL = million fibers per liter, GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; ICP = Inductively Coupled Plasma; and ICPMS = Inductively Coupled Plasma/Mass Spectrometry.</p>			
<p><u>Legend:</u>  D: Once each day.  M: Once each month.  Q: Once each quarter.  Y: Once each year.  M/Q: Monthly for the first year of operation, Quarterly thereafter.</p>			

**Table E-4. Schedule for Sampling, Measurements, and Analysis (see note 3) for Structural Dewatering Discharges (Category 3)**

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001, Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is “Grab” unless noted otherwise</b>			
Discharge Flow	MGD	Daily (meter or calculation based on time and pump capacity)	--
Acute Whole Effluent Toxicity	% Survival	Once during the first year of operation and if at least 90% survival rate for the first year, then every three years thereafter.	--
pH	Standard Units	Monthly during the first year of operation and if in full compliance during the first year, then once a quarter thereafter	--
Hardness (as CaCO <sub>3</sub> )	mg/L	1/Year	--
Total Solids (applicable to facilities that treat effluent to remove any form of solids)	mg/L	Monthly	--
Total Dissolved Solids	mg/L	1/Year	--

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001. Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is "Grab" unless noted otherwise</b>			
Temperature	°C	1/Year	--
Salinity	ppt	1/Year	--
Turbidity in Nephelometric Turbidity Unit (NTU) (applicable to facilities that treat effluent to remove any form of solids)	NTU	Monthly during the first year of operation and if in full compliance during the first year, then once a quarter thereafter	1/Every 3 Years
Chlorine (applicable to facilities that treat effluent with chlorine)	mg/L	Daily	--
Chlorides	mg/L	1/Year	--
Dissolved Oxygen	mg/L	1/Year	--
Conductivity	mmhoms/cm	1/Year	--
Antimony, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Arsenic, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Beryllium, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Cadmium, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Hexavalent Chromium (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Total Chromium (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Copper, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Cyanide, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Lead, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Mercury, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Nickel, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Selenium, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Silver, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Thallium, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Effluent EFF-001, Effluent for Reuse REU-001, or Effluent for Land Discharge LDE-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is “Grab” unless noted otherwise</b>			
Zinc, Total (see note 1)	µg/L	1/Year during the first year of operation and if not detected or triggered then 1/Every 3 Years thereafter.	--
Volatile Organic Compounds	µg/L	Once within the first year of operation	--
Semi Volatile Organic Compounds except Polynuclear Aromatic Hydrocarbons	µg/L	Once within the first year of operation	--
Polynuclear Aromatic Hydrocarbons	µg/L	Once within the first year of operation	--
Other Pollutants not listed above but there is evidence to be present in the influent and/or effluent and being treated.	µg/L	Quarterly for the first year of operation and if not detected or triggered then once every three years thereafter	--
All Applicable Standard Observations (see note 2)	No Units	Quarterly or whenever attending the Facility	Quarterly or whenever sampling the receiving water
<p>Note 1: The Discharger shall appropriately select analytical procedures that will compensate for salinity in the sample matrix. Inorganic compounds samples shall be analyzed for total (unfiltered) constituents with the reporting levels not exceeding the following: 0.002 µg/L for Mercury and 1.0 µg/L for Cyanide. For all other inorganic compounds, the minimum levels shall not exceed the following if Inductively Coupled Plasma Mass Spectrometry (ICP-MS) analytical technique is utilized: 0.25 µg/L for Cadmium and Silver, 1.0 µg/L for Nickel, Thallium and Zinc; 2.0 µg/L for Arsenic and Selenium; and 0.5 µg/L for Antimony, Beryllium; Total Chromium, Copper, and Lead (SIP Appendix 4 Minimum Levels (<a href="http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf">http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf</a>)). If the Discharger exceeds the trigger for mercury of 0.025, the Discharger shall sample and analyze the additional samples using ultra-clean techniques as described in USEPA methods 1669 and 1631 to eliminate the possibility of artifactual contamination of the sample.</p> <p>Note 2: Standard Observations are explained in Provisions IX.C through IX.E of this document.</p> <p>Note 3: The monitoring program in this table is the minimum requirements. The Professional Engineer in charge of the treatment system operation may require more frequent monitoring program with additional monitoring parameters.</p> <p>Definitions: ug/L = microgram per liter or parts per billion (ppb), g/day = grams per day, gpm = gallons per minute, mg/L = milligram per liter or parts per million (ppm), gpd = gallons per day, MFL = million fibers per liter GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; ICP = Inductively Coupled Plasma; and ICPMS = Inductively Coupled Plasma/Mass Spectrometry.</p>			

**Table E-5. Additional Monitoring Requirements: Applicable when Limit or Trigger Value is Exceeded in Previous Sample Set**

Monitoring outlined in Table E-5 is required for up to two quarters (as specified below) following an exceedance of an effluent limit or trigger value.

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Influent INF-001	Minimum Sampling Frequency for Effluent EFF-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is “Grab” unless noted otherwise</b>				
		The monitoring requirements in these two columns apply when any constituent in the effluent of a discharge, as monitored per Table E-2, E-3 or E-4, exceeds the corresponding trigger as listed in Table 2 of the Order.		
Flow Rate	MGD	--	D (meter or calculation based)	--

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Influent INF-001	Minimum Sampling Frequency for Effluent EFF-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is "Grab" unless noted otherwise</b>				
			on time and pump capacity)	
Acute Whole Effluent Toxicity	% Survival	--	V	--
pH	Standard Units	V	V	V, Q <sup>4</sup>
Hardness (as CaCO <sub>3</sub> )	mg/L	--	--	Q <sup>5</sup>
Total Solids	mg/L	--	--	Q <sup>4</sup>
Total Dissolved Solids	mg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Temperature	°C	--	--	Q <sup>4</sup>
Salinity	ppt	--	M <sup>4</sup>	M <sup>4</sup>
Turbidity in Nephelometric Turbidity Unit (NTU)	NTU	3 per Q	3 per Q	3 per Q <sup>3</sup>
Chlorine (applicable to facilities that treat effluent with chlorine)	mg/L	--	V	--
Chlorides	mg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Dissolved Oxygen	mg/L	--	--	3 per Q <sup>3</sup>
Conductivity	mmhoms/cm	3 per Q	3 per Q	3 per Q <sup>3</sup>
Antimony, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Arsenic, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Beryllium, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Cadmium, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Hexavalent Chromium (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Total Chromium (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Copper, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Cyanide, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Lead, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Mercury, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Nickel, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Selenium, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Silver, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Thallium, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Zinc, Total (see note 1)	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Volatile Organic Compounds	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Semi Volatile Organic Compounds except Polynuclear Aromatic Hydrocarbons	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
Polynuclear Aromatic Hydrocarbons	µg/L	3 per Q	3 per Q	3 per Q <sup>3</sup>
All Applicable Standard Observations (see note 2)	No Units	Q or whenever attending the Facility	Q or whenever attending the facility	Q or whenever sampling the receiving water
Note 1: The Discharger shall appropriately select analytical procedures that will compensate for salinity in the sample matrix. Inorganic				

Required Analytical Test Method Number, Technique, Standard Methods (SM), USEPA Method Number (EPA), 40 CFR Part (or equivalent)/Sampling Station	Units	Minimum Sampling Frequency for Influent INF-001	Minimum Sampling Frequency for Effluent EFF-001	Minimum Sampling Frequency for Receiving Surface Water RSW-001U and RSW-001D
<b>Type of Sample is “Grab” unless noted otherwise</b>				
<p>compounds samples shall be analyzed for total (unfiltered) constituents with the reporting levels not exceeding the following: 0.002 µg/L for Mercury and 1.0 µg/L for Cyanide. For all other inorganic compounds, the minimum levels shall not exceed the following if Inductively Coupled Plasma Mass Spectrometry (ICP-MS) analytical technique is utilized: 0.25 µg/L for Cadmium and Silver, 1.0 µg/L for Nickel, Thallium and Zinc; 2.0 µg/L for Arsenic and Selenium; and 0.5 µg/L for Antimony, Beryllium; Total Chromium, Copper, and Lead (SIP Appendix 4 Minimum Levels (<a href="http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf">http://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/sip2005.pdf</a>)). If the Discharger exceeds the trigger for mercury of 0.025, the Discharger shall sample and analyze the additional samples using ultra-clean techniques as described in USEPA methods 1669 and 1631 to eliminate the possibility of artifactual contamination of the sample.</p>				
<p>Note 2: Standard Observations are explained in Provisions IX.C through IX.E of this document.</p>				
<p>Note 3: In addition to the monitoring required, during the same period, the Discharger shall take three additional samples (three up-gradient receiving surface water (RSW-001U) and three down-gradient receiving surface water (RSW-001D) for each exceeded constituent.</p>				
<p>Note 4: This parameter should be monitored if changes in this parameter may cause changes in the concentration of the triggered constituent.</p>				
<p>Note 5: Sampling should be performed when Cadmium, Chromium (total), Copper, Lead, Nickel, Silver, or Zinc triggers are exceeded.</p>				
<p><u>Definitions:</u> ug/L = microgram per liter or parts per billion (ppb), g/day = grams per day, gpm = gallons per minute, mg/L = milligram per liter or parts per million (ppm), gpd = gallons per day, MFL = million fibers per liter                      GC = Gas Chromatography; GCMS = Gas Chromatography/Mass Spectrometry; FAA = Flame Atomic Absorption; GFAA = Graphite Furnace Atomic Absorption; Hydride = Gaseous Hydride Atomic Absorption; ICP = Inductively Coupled Plasma; and ICPMS = Inductively Coupled Plasma/Mass Spectrometry.</p>				
<p><u>Legend:</u>                      D: Once each day.                      M: Once each month.                      Q: Once each quarter.                      V: Sampling should be performed within 24 hours after an effluent limit violation is confirmed in EFF-001.</p>				

**IX. OTHER MONITORING REQUIREMENTS**

**A. Chemical Additives Monitoring:** If applicable, monitoring related to chemical usage shall be conducted by the Discharger as required in its treatment system design specification and Operation and Maintenance Manual.

**B. Standard Observations for Receiving Water**

1. Floating and suspended materials (e.g., oil, grease, algae, and other macroscopic particulate matter): presence or absence, source, and size of affected area.
2. Discoloration and turbidity: description of color, source, and size of affected area.
3. Odor: presence or absence, characterization, source, distance of travel, and wind direction.
4. Beneficial water use: presence of water-associated waterfowl or wildlife, fisherperson, and other recreational activities in the vicinity of each sampling station.
5. Hydrographic condition, if relevant:
  - a. Time and height of corrected high and low tides (corrected to nearest National Oceanic and Atmospheric Administration location for the sampling date and time of sample and collection).

- b. Depth of water columns and sampling depths.
6. Weather condition:
  - a. Air temperature.
  - b. Wind direction and estimated velocity.
  - c. Total precipitation during the five days prior to observation.

### **C. Standard Observations for Onsite Usage of Reclaimed Water**

1. Floating and suspended materials of waste origin (to include oil, grease, algae, and other macroscopic particulate matter): presence or absence, source, and size of affected area.
2. Discoloration and turbidity: description of color, source, and size of affected area.
3. Odor: presence or absence, characterization, source, distance of travel, and wind direction.
4. Weather condition:
  - a. Air temperature.
  - b. Wind direction and estimated velocity.
  - c. Total precipitation during the previous five days and on the day of observation.
5. Deposits, discolorations, and/or plugging in the conveyance system that could adversely affect the system reliability and performance.
6. Operation of the valves, outlets, sprinkler heads, and/or pressure shutoff valves in conveyance system.

### **D. Standard Observations for Groundwater Treatment and/or Pumping System**

1. Odor: presence or absence, characterization, source, distance of travel, and wind direction.
2. Weather condition: wind direction and estimated velocity.
3. Deposits, discolorations, and/or plugging in the treatment system (stripping tower, carbon filters, etc.) that could adversely affect the system reliability and performance.
4. Operation of the float and/or pressure shutoff valves installed to prevent system overflow or bypass.

## **X. REPORTING REQUIREMENTS**

### **A. General Monitoring and Reporting Requirements**

The Discharger shall comply with all Standard Provisions (Attachment D) related to monitoring, reporting, and record keeping.

**B. Self-Monitoring Reports (SMRs)**

1. **SMR Format.** At any time during the term of this Order, the State or Regional Water Board may notify the Discharger to electronically submit SMRs using the State Water Board's California Integrated Water Quality System (CIWQS) Program Web site (<http://www.waterboards.ca.gov/ciwqs/index.html>). The CIWQS website will provide additional directions for SMR submittal in the event of a service interruption for electronic submittal.
2. **SMR Due Dates and Contents.** The Discharger shall submit SMRs within 45 days after the end of each calendar quarter, with the contents specified below:
  - a. The Discharger shall attach a cover letter to the SMRs. The information contained in the cover letter shall clearly identify number of permit violations; discuss corrective actions taken or planned; and the proposed time schedule for corrective actions. Identified violations must include a description of the requirement that was violated and a description of the violation. In the cover letter, the Discharger shall also document the volume of the effluent reused during that reporting period.
  - b. The Discharger shall arrange all reported data in a tabular format. The data shall be summarized to clearly illustrate whether the facility is operating in compliance with the effluent limitations. The Discharger shall not include laboratory reports unless requested.
  - c. SMRs must be submitted to the Regional Water Board signed and certified as required by the Standard Provisions (Attachment D) to the address listed below:

California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612  
Attn: NPDES Wastewater Division  
Extracted Brackish Groundwater General NPDES NO. CAG912004
  - d. SMRs shall also include a description of operation and maintenance (O&M) of the groundwater extraction and treatment system consistent with the O&M manual, which shall be available to all personnel who are responsible for operation and maintenance activities.
  - e. SMRs shall include the results of analyses and observations as follows:
    - (1) Calculations for all limitations that require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.
    - (2) A table identifying by method number the analytical procedures used for analyses. Any special methods shall be identified and should have prior approval of the Regional Water Board's Executive Officer.
    - (3) Laboratory results shall be summarized in tabular form but actual laboratory reports do not need to be included in the report. A summary of quality assurance/quality

control activities data such as field, travel, and laboratory blanks shall be reported for each analyzed constituent or group of constituents.

- (4) A summary of the monitoring data to include information such as source of the sample (influent, effluent, or receiving water); the constituents; the methods of analysis used; the laboratory reporting limits in  $\mu\text{g/L}$ ; the sample results ( $\mu\text{g/L}$ ); the date sampled; and the date sample was analyzed.
- (5) Flow (in gpm) and mass removal data (in kilograms).
- (6) Summary of treatment system status during the reporting period (e.g., in operation/on standby) and reason(s) for non-routine treatment system shut down.
- (7) The Discharger shall submit annual SMRs by February 15 of each year, covering the previous calendar year. The annual SMR shall contain all data required for the fourth quarter in addition to summary data required for annual reporting. This report may be submitted in lieu of the SMR for the fourth quarter of a calendar year.
- (8) Annual SMRs shall contain tabular summary of the monitoring data obtained during the previous year. In addition, the annual SMR shall contain a comprehensive discussion of the compliance record and the corrective actions taken or planned that may be needed to bring the Discharger into full compliance with the waste discharge requirements including any trigger study required by Special Provision VI.C.6 and the progress in satisfaction of Special Provisions VI.C.7 and VI.C.8 of this Order. The annual SMR shall document that the annual fee has been paid.
- (9) If, during any calendar quarter, a Discharger becomes aware that any monitoring data obtained for compliance with this Order may be invalid, the Discharger shall submit a claim of invalid monitoring data, as uploaded on CIWQS with a confirmation email to the Regional Water Board staff in charge of this permit, within 45 days after end of that calendar quarter. The Discharger shall include with this claim, the name, phone number, and email of its assigned staff to investigate the cause(s) of errors and the corrective actions taken, or date when actions will be completed to eliminate or reduce future data errors. The Discharger shall also provide, in this claim, a date that the O&M manual will be updated to include errors prevention measures. These preventive measures shall include but not be limited to accelerated monitoring (e.g., twice a month monitoring for at least one month) to provide valid monitoring data indicating the effectiveness of the proposed preventive measures.

f. Additional Specifications for Submitting SMRs to CIWQS — If the Discharger submits SMRs to CIWQS, it shall submit analytical results and other information using one of the following methods:

**Table E-6. SMR Reporting for CIWQS**

Parameter	Method of Reporting	
	EDF/CDF data upload or manual entry	Attached File
All parameters identified in influent, effluent, and receiving water monitoring tables (except	Required for All Results	

Dissolved Oxygen and Temperature)		
Dissolved Oxygen Temperature	Required for Monthly Maximum and Minimum Results Only <sup>(1)</sup>	Discharger may use this method for all results or keep records
Cyanide Arsenic Cadmium Chromium Copper Lead Mercury Nickel Selenium Silver Zinc Dioxins and Furans (by U.S. EPA Method 1613)	Required for All Results <sup>(2)</sup>	
Antimony Beryllium Thallium Pollutants by U.S. EPA Methods 601, 602, 608, 610, 614, 624, and 625	Not Required (unless identified in influent, effluent, or receiving water monitoring tables), but encouraged <sup>(1)</sup>	Discharger may use this method and submit results with application for permit reissuance, unless data submitted by CDF/EDF upload
Analytical Method	Not Required (Discharger may select “data unavailable”) <sup>(1)</sup>	
Collection Time Analysis Time	Not Required (Discharger may select “0:00”) <sup>(1)</sup>	

**Footnotes for Table E-6:**

- [1] The Discharger shall continue to monitor at the minimum frequency specified in the monitoring tables, keep records of the measurements, and make the records available upon request.
- [2] These parameters require EDF/CDF data upload or manual entry regardless of whether monitoring is required by this Monitoring and Reporting Program or other provisions of this Order (except for biosolids, sludge, or ash provisions).

**3. Monitoring periods and reporting for all required monitoring shall be completed according to the following schedule:**

**Table E-7. Monitoring Periods and Reporting Schedule**

Sampling Frequency	Monitoring Period Begins On...	Monitoring Period
Continuous	Effective startup date	All
Daily	Effective startup date	(Midnight through 11:59 PM) or any 24-hour period that reasonably represents a calendar day for purposes of sampling.
Weekly	Effective startup date	Effective startup day through one week after Effective startup date
Monthly	First day of calendar month following the last day of the startup date	1 <sup>st</sup> day of calendar month through last day of calendar month

Quarterly	Closest of January 1, April 1, July 1, or October 1 following (or on) the last day of the startup date	January 1 through March 31 April 1 through June 30 July 1 through September 30 October 1 through December 31
Semiannually	Closest of January 1 or July 1 following (or on) the last day of the startup date	January 1 through June 30 July 1 through December 31
Annually	January 1 following (or on) the last day of the start-up date	January 1 through December 31
Once Every 3 Years	Permit effective date	Once within 3 years of the effective date of the permit
Once per Permit Term (1/5 years)	Permit effective date	Once during the permit term within 12 months prior to applying for permit reissuance

4. RL and MDL Reporting. The Discharger shall report with each sample result the applicable Reporting Level (RL) and the current Method Detection Limit (MDL), as determined by the procedure in 40 CFR Part 136. The Discharger shall report the results of analytical determinations for the presence of chemical constituents in a sample using the following reporting protocols:
- a. Sample results greater than or equal to the RL shall be reported as measured by the laboratory (i.e., the measured chemical concentration in the sample).
  - b. Sample results less than the RL, but greater than or equal to the laboratory's MDL, shall be reported as "Detected, but Not Quantified," or DNQ. The estimated chemical concentration of the sample shall also be reported. For the purposes of data collection, the laboratory shall write the estimated chemical concentration next to DNQ as well as the words "Estimated Concentration" (may be shortened to "Est. Conc.>"). The laboratory may, if such information is available, include numerical estimates of the data quality for the reported result. Numerical estimates of data quality may be percent accuracy ( $\pm$  a percentage of the reported value), numerical ranges (low to high), or any other means considered appropriate by the laboratory.
  - c. Sample results less than the laboratory's MDL shall be reported as "Not Detected," or ND.
  - d. Dischargers are to instruct laboratories to establish calibration standards so that the ML value (or its equivalent if there is differential treatment of samples relative to calibration standards) is the lowest calibration standard. At no time is the Discharger to use analytical data derived from *extrapolation* beyond the lowest point of the calibration curve.

**C. Discharge Monitoring Reports (DMRs) - Not Applicable****D. Other Reports**

1. **Trigger Study Report:** The Discharger shall report the results of any trigger study required by Special Provision – VI.C.6 and the progress in satisfaction of compliance schedule dates specified in Special Provisions VI.C.7, VI.C.8, and VI.C.9 of this Order.
2. **Spill Reports:** If any hazardous substance is discharged in or on any waters of the state, or discharged and deposited where it is, or probably will be discharged in or on any waters of the state, the Discharger shall report such a discharge to this Regional Water Board, at (510) 622-2369 and to Cal/EMA at (800) 852-7550 within 24 hours of becoming aware of the spill. A written report shall be uploaded on CIWQS, with an confirmation email to staff, within five (5) working days and shall contain information relative to:
  - a. Nature of waste or pollutant,
  - b. Quantity involved,
  - c. Duration of incident,
  - d. Cause of spilling,
  - e. Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect, if any,
  - f. Estimated size of affected area,
  - g. Nature of effects (i.e., fish kill, discoloration of receiving water, etc.),
  - h. Corrective measures that have been taken or planned, and a schedule of these activities, and
  - i. Persons/agencies notified.
3. **Reports of Treatment Unit Bypass and Permit Violation:** In the event the Discharger violates or threatens to violate the conditions of the waste discharge requirements and prohibitions or intends to permit a treatment unit bypass due to:
  - a. Maintenance work, power failures, or breakdown of waste treatment equipment,
  - b. Accidents caused by human error or negligence,
  - c. The self-monitoring program results exceeding effluent limitations,
  - d. Any activity that would result in a frequent or routine discharge of any toxic pollutant not limited by this Order, or
  - e. Other causes, such as acts of nature.

The Discharger shall notify the Regional Water Board within 24 hours of when the Discharger or Discharger's agent has knowledge of the incident and confirm this notification in writing and

uploaded on CIWQS with a confirmation email to Regional Water Board staff, within 5 working days of the initial notification. The written report shall include time, date, duration and estimated volume of waste bypassed, method used in estimating volume and person notified of the incident. The report shall include pertinent information explaining reasons for the noncompliance and shall indicate what steps were taken to prevent the problem from recurring.

If a violation of the effluent limitations should occur, the Discharger shall direct the effluent to a holding tank, or the extraction and treatment system shall be shut down. The confirmation sampling shall be conducted when the discharge is directed to a holding tank and contained or right before the extraction and treatment system is shut down. The content of the holding tank shall be retreated until the retreated effluent is in compliance, be discharged to a sanitary sewer system, or be disposed in accord with the provisions of applicable California Code of Regulations. The Discharger shall obtain permission from the sanitary sewer agency for any temporary or permanent discharges to the sanitary sewer.

# ATTACHMENT F – FACT SHEET

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## **ATTACHMENT F – FACT SHEET**

As described in Section II of this Order, this Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order. This Order has been prepared under a standardized format to accommodate a broad range of discharge requirements for dischargers in California. Except where identified as “not applicable”, all sections or subsections are applicable to the discharges regulated under this Order.

This Order is intended to cover discharge or reuse of extracted brackish groundwater, reverse osmosis concentrate from treatment of groundwater by reverse osmosis, and extracted and treated groundwater resulting from structural dewatering.

### **I. PERMIT INFORMATION**

In 2007, the Regional Water Board issued the first NPDES General Permit for the discharge or reuse of extracted brackish groundwater and reverse osmosis concentrate resulting from the treatment of groundwater by reverse osmosis and the discharge or reuse of extracted and treated groundwater resulting from structural dewatering (Extracted Brackish Groundwater General Permit). The Extracted Brackish Groundwater General Permit (Regional Water Board Order No. R2-2007-0033) was adopted on April 11, 2007, became effective July 1, 2007, and expired July 1, 2012. From July 2007 to June 2012, the Regional Water Board’s Executive Officer authorized 41 discharges pursuant to Order No. R2-2007-0033. Out of these 41 discharges, 12 discharges were under category 1, 1 discharge under category 2, and 28 discharges under category 3. (See II.A below for descriptions of the discharge categories.)

The Extracted Brackish Groundwater General Permit needs to be reissued because 7 Dischargers have submitted 28 Notice of Intent (NOI) applications to either continue discharging or initiate the discharge of groundwater to surface water. Out of these 28 discharges, 11 discharges are under category 1, 1 discharge under category 2, and 16 discharges under category 3.

Within the next five years, it is anticipated based on a review of the type of discharges authorized under Order No. R2-2007-0033 that a number of additional construction-related sites will need structural dewatering where the groundwater requires treatment prior to discharge. Some sanitary sewage treatment facilities do not accept new discharges from groundwater extraction sites, and, therefore, a number of sites conducting groundwater extraction will require waste discharge requirements from the Regional Water Board for discharge to surface water. The number of groundwater discharges anticipated exceeds the capacity of available Regional Water Board staff to develop and bring individual waste discharge requirements to the Regional Water Board for adoption. These circumstances create the need for an expedited system to process the anticipated requests. The reissuance of the Extracted Brackish Groundwater General Permit will expedite the processing of requirements and enable the Regional Water Board to better utilize limited staff resources.

The following table (Table F-1) and paragraphs summarize administrative information related to the facilities. As applicable, Table F-1 provides cross-references to the specific sections of the NOI Form, in Attachment B, that each Discharger enrolled under this Order must initially complete and submit as part of the NOI.

**Table F-1. Facility Information**

<b>California Integrated Water Quality System (CIWQS) Regulatory measure and Place ID</b>	A CIWQS Place ID and Regulatory measure identification number will be assigned to a facility when the Executive Officer issues the Authorization to Initiate Discharge
<b>Discharger</b>	NOI Form in Attachment B
<b>Name of Facility</b>	
<b>Facility Address</b>	
<b>Facility Contact, Title, Phone, and email address</b>	
<b>Consultant Name, Phone, and email address</b>	
<b>Authorized Person to Sign and Submit Reports</b>	
<b>Mailing Address and Contact Person Name, Phone, and email address</b>	
<b>Billing Address and Contact Person Name, Phone, and email address</b>	
<b>Type of Project</b>	
<b>Major or Minor Facility</b>	
<b>Pretreatment Program</b>	Not Applicable
<b>Reclamation Requirements</b>	Producer (See NOI in Attachment B)
<b>Facility Permitted Flow</b>	NOI Form in Attachment B
<b>Facility Design Flow</b>	
<b>Watershed</b>	
<b>Receiving Water Type</b>	

- A. Site Owners or Operators who apply for an Authorization to Discharge under this Order and who are granted such authorization are hereinafter called Discharger(s). The groundwater treatment facility is considered the Facility regulated under this Order (hereinafter Facility). For the purposes of this Order, references to the “Discharger(s)” or “permittee(s)” in applicable federal and State laws, regulations, plans, or policy are held to be equivalent to references to the Discharger(s) herein.
  
- B. The Facilities regulated under the previous general NPDES permit, Regional Water Board Order No. R2-2007-0033, discharge wastewater to multiple receiving waters of the State and/or the United States. The terms and conditions of the previous permit were automatically continued in effect until new Waste Discharge Requirements and NPDES permit are adopted pursuant to this Order. During the term of Order No. R2-2007-0033, 41 discharges were authorized to discharge or reuse extracted brackish groundwater and reverse osmosis concentrate resulting from treatment of groundwater by reverse osmosis and discharge or reuse extracted and treated groundwater resulting from structural dewatering to the receiving water documented in the NOI submitted for each discharge.

- C. As of January 2012, seven Dischargers had filed 28 reports of waste discharge by submitting an NOI to continue their discharge authorization under this Order. In the process of reviewing and approving NOIs, supplemental information may be requested from a subset of these facilities. It may also be necessary to visit facilities for which an NOI has been submitted, to observe operations and collect additional data to determine the eligibility of authorizing those discharges under this Order. This Order requires Dischargers to submit monitoring data according to the requirements contained in the Monitoring and Reporting Program (Attachment E). If monitoring data indicate significant contamination by metals, pesticides, or other conservative pollutants, Dischargers authorized under this General Permit may be required to apply for an individual NPDES permit.

## **II. DISCHARGE DESCRIPTION**

The facilities that may be covered under this Order are aquifer reclamation program well discharges, reverse osmosis (RO) concentrate discharges from the aquifer reclamation program, and structural dewatering discharges. This Order covers discharges from these facilities to all surface waters such as creeks, streams, rivers including flood control canals, lakes, or San Francisco Bay. Such discharges may occur directly to surface waters or through constructed storm drain systems.

### **A. Description of Wastewater**

All discharges authorized under this Order originate as groundwater. The Regional Water Board acknowledges that groundwater may contain naturally-occurring or incidental pollutants and various organic pollutants not addressed by the Fuel and VOC General Permit at levels that exceed those found in surface waters and in limited circumstances at concentrations above applicable water quality criteria for surface waters. Such naturally-occurring pollutants of concern include total dissolved solids (TDS) and common metals. In addition, discharges authorized by this Order may include suspended and settleable solids and turbidity that are introduced to discharges due to poorly constructed or deteriorating wells and at the points of discharge by erosion and scouring of the banks and bottoms of receiving waters.

This Order also authorizes the discharge of RO concentrate resulting from the treatment of uncontaminated groundwater by RO. Such discharges may contain naturally-occurring dissolved pollutants that are present in well waters, but these dissolved materials may be concentrated by the RO process. In these discharges, therefore, the pollutants of concern include dissolved solids and common metals.

In summary, this Order regulates discharges to surface water from the three following sources:

1. Aquifer reclamation program well discharges (typically long term): these groundwater extraction facilities are in operation to protect drinking water supply aquifers or other municipal facilities from salt water intrusion. For example, the Alameda County Water District (ACWD) operates a series of wells along the southeast side of San Francisco Bay. Historically, ACWD has discharged and in the future may again discharge up to 30 MGD of extracted brackish groundwater in the Fremont-Newark area to flood control channels. These discharges have been below 5,000 mg/L total dissolved solids.

2. RO concentrate from aquifer reclamation program well discharges to estuarine environments (typically long term): pumped groundwater may be treated by RO so that less saline groundwater may be returned to the drinking water supply and the RO concentrate discharged as waste. For example, this is the case with the ACWD RO facility located in Newark. RO concentrate discharges to a sanitary sewer system are not required to obtain coverage under this Order.
3. Structural dewatering resulting in greater than 10,000 gallons per day and requiring treatment for pollutants other than fuels or volatile organic compounds (typically long term): these are long-term dewatering systems under or around buildings and pipelines to control groundwater infiltration. Buildings and underpass structures are two examples of structures that may require continuous dewatering. Treatment is required where a physical, biological, or chemical treatment process is necessary in order for the structural dewatering discharge to comply with the prohibitions and limitations of this Order. The target of treatment may include naturally occurring compounds (e.g., sulfides, alkalinity, acidity) that, if not treated, would pollute or contribute to pollution of surface receiving waters. This Order does not cover groundwater that requires treatment due to contamination from fuels or volatile organic compounds. Such discharges must seek coverage under a separate general permit, VOC Fuel General Permit No. CAG912002.

## **B. Discharge Points and Receiving Waters**

The Order authorizes discharges to all surface waters of the San Francisco Bay Region, including inland surface waters, enclosed bays, and estuaries. The NOI Form (Attachment B) requires every Discharger to provide the discharge location and a map highlighting the discharge path to surface waters.

## **C. Summary of Existing Requirements**

The effluent limitations contained in the previous order (Regional Water Board Order No. R2-2007-0033) are described below:

1. **Residual Chlorine:** There shall be no detectable levels of residual chlorine in the effluent (a non-detect result using a detection level equal or less than 0.08 milligram per liter will not be deemed to be out of compliance). This limit only applies to Dischargers who chlorinate their well water.
2. **pH:** The pH of the discharge shall not exceed 8.5 nor be less than 6.5.
3. **Acute Toxicity:** Representative samples of the effluent, with compliance measured at Monitoring Location EFF-001 as described in the Authorization to Initiate Discharge, shall meet the following limits for acute toxicity. Bioassays shall be conducted in compliance with Section V.A of the Monitoring and Reporting Program (Attachment E).

The survival of test fish in 96-hour static renewal bioassays with the effluent shall be not less than a three sample moving median of 90% survival and a single test value of not less than 70% survival.

These acute toxicity limitations are further defined as follows:

- a) 3-sample median. A bioassay test showing survival of less than 90 percent represents a violation of this effluent limit, if one or more of the past two or less bioassay tests show less than 90 percent survival.
- b) Single sample. A bioassay test showing survival of less than 70 percent represents a violation of this effluent limit.

Bioassays shall be performed using the most up-to-date USEPA protocol. Bioassays shall be conducted using rainbow trout as the test species in compliance with *Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms*, currently 5<sup>th</sup> Edition (EPA-821-R-02-012), with exceptions granted to the Discharger by the Executive Officer and the Environmental Laboratory Accreditation Program (ELAP) upon the Discharger's request with justification.

#### **D. Compliance Summary**

Except for two, no other Dischargers authorized under the previous Extracted Brackish Groundwater General Permit reported any effluent limits violations. The East Bay Municipal Utility District (EBMUD) reported two residual chlorine and two pH violations, and the City of Mountain View reported a series of acute toxicity violations. Regional Water Board enforcement staff assessed legally-mandated minimum penalties for the EBMUD chlorine and pH violations. After the City of Mountain View reported its acute toxicity violations, the City proactively investigated the cause and contacted the local sanitary sewer agency, received a permit to discharge to the sanitary sewer system, and subsequently terminated the discharge.

#### **E. Planned Changes**

As required in Attachment D, a Discharger authorized under this Order shall submit a modified NOI before making any material change in the character, location, or volume of the discharge.

### **III. APPLICABLE PLANS, POLICIES, AND REGULATIONS**

The requirements contained in the Order are based on the requirements and authorities described in this section:

#### **A. Legal Authorities**

This Order is issued pursuant to section 402 of the federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (USEPA) and chapter 5.5, division 7 of the California Water Code [(CWC), commencing with section 13370]. It shall serve as an NPDES permit for point source discharges from these facilities to surface waters.

This Order also serves as General Waste Discharge Requirements pursuant to CWC article 4, chapter 4, division 7 (commencing with section 13260). States may request authority to issue general NPDES permits pursuant to Code of Federal Regulations, Title 40, Chapter 1, Subchapter D, part 122.28 (40 CFR 122.28). 40 CFR 122.28 provides for the issuance of general permits to regulate discharges of waste which result from similar operations, are the same types of waste, require the same effluent limitations, require similar monitoring, and are more appropriately regulated under a general permit rather than individual permits. This general permit meets the requirements of 40 CFR 122.28 because the discharges and proposed discharges:

- result from similar operations (all involve extraction, treatment, and discharge of groundwater);
- are the same types of waste (all are extracted brackish groundwater or RO concentrate from extracted groundwater);
- require similar effluent limitations for the protection of the beneficial uses of surface waters in the San Francisco Bay Region (this general permit does not cover direct discharges to the Pacific Ocean);
- require similar monitoring; and
- are more appropriately regulated under a general permit rather than individual permits.

## **B. California Environmental Quality Act (CEQA)**

Under CWC section 13389, this action to issue an NPDES permit is exempt from the provisions of CEQA.

## **C. State and Federal Regulations, Policies, and Plans**

- 1. Water Quality Control Plans.** *The Water Quality Control Plan for the San Francisco Bay Basin* (the Basin Plan) is the Regional Water Board's master water quality control planning document. It designates beneficial uses and water quality objectives (WQOs) for waters of the State, including surface and groundwater. It also includes implementation programs to achieve WQOs. The Basin Plan was duly adopted by the Regional Water Board and approved by the State Water Resources Control Board (State Water Board), the Office of Administrative Law, and USEPA.

The Basin Plan designates beneficial uses, establishes WQOs, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. The Basin Plan states that the beneficial uses of any specifically-identified water body generally apply to its tributary streams. The Basin Plan may not specifically identify beneficial uses for every receiving water regulated under this permit, but identifies present and potential uses for the downstream water body, to which the receiving water, via an intermediate water body, is tributary. The potential and existing beneficial uses for surface waters are:

- Municipal and domestic supply
- Fish migration
- Fish spawning

- Industrial service supply
- Navigation
- Industrial process supply
- Marine habitat
- Agricultural supply
- Estuarine habitat
- Groundwater recharge
- Shellfish harvesting
- Water contact recreation
- Non-contact water recreation
- Ocean, commercial, and sport fishing
- Wildlife habitat
- Areas of special biological significance
- Cold freshwater habitat
- Warm freshwater habitat
- Preservation of rare and endangered species

The potential and existing beneficial uses for groundwaters are:

- Municipal and domestic supply
- Industrial service supply
- Industrial process supply
- Agricultural supply
- Freshwater replenishment

In addition, the Basin Plan implements State Water Board Resolution No. 88-63, which established State policy that all waters, with certain exceptions, should be considered suitable or potentially suitable for municipal or domestic supply. Requirements of this Order implement the Basin Plan.

On September 18, 1975, the State Water Board adopted the *Water Quality Control Plan for Control of Temperature in the Coastal Interstate Waters and Enclosed Bays and Estuaries of California* (hereinafter the Thermal Plan). The Thermal Plan contains objectives governing cooling water discharges, providing different and specific numeric and narrative water quality objectives for new and existing discharges.

The State Water Board's *Water Quality Control Plan for Enclosed Bays and Estuaries—Part 1, Sediment Quality* became effective on August 25, 2009. This plan supersedes other narrative sediment quality objectives and establishes new sediment quality objectives and related implementation provisions for specifically defined sediments in most bays and estuaries.

2. **National Toxics Rule (NTR) and California Toxics Rule (CTR).** USEPA adopted the NTR on December 22, 1992, and amended it on May 4, 1995, and November 9, 1999. About 40 criteria in the NTR and apply in California. On May 18, 2000, USEPA adopted the CTR.

The CTR promulgated new toxics criteria for California and, in addition, incorporated the previously adopted NTR criteria that applied in the State. The CTR was amended on February 13, 2001. These rules contain water quality criteria (WQC) for priority toxic pollutants.

- 3. State Implementation Policy.** On March 2, 2000, the State Water Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP). The SIP became effective on April 28, 2000, with respect to the priority pollutant criteria promulgated through the NTR and to the WQOs established in the Basin Plan. The SIP became effective on May 18, 2000, with respect to the priority pollutant criteria promulgated through the CTR. The State Water Board adopted amendments to the SIP on February 24, 2005, that became effective on July 13, 2005. The SIP establishes implementation provisions for priority pollutant criteria and objectives and provisions for chronic toxicity control. Requirements of this Order implement the SIP.
- 4. Alaska Rule.** On March 30, 2000, USEPA revised its regulation that specifies when new and revised state and tribal water quality standards (WQS) become effective for CWA purposes [65 Fed. Reg. 24641 (April 27, 2000), codified at 40 CFR 131.21]. Under the revised regulation (also known as the Alaska Rule), new and revised standards submitted to USEPA after May 30, 2000, must be approved by USEPA before being used for CWA purposes. The final rule also provides that standards already in effect and submitted to USEPA by May 30, 2000, may be used for CWA purposes, whether or not approved by USEPA.
- 5. Antidegradation Policy.** 40 CFR 131.12 requires that state WQS include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution 68-16, which incorporates the federal antidegradation policy where the federal policy applies under federal law and requires that existing quality of waters be maintained unless degradation is justified based on specific findings. The Regional Water Board's Basin Plan implements, and incorporates by reference, both the State and federal antidegradation policies.
- 6. Anti-Backsliding Requirements.** CWA Sections 402(o)(2) and 303(d)(4) and 40 CFR 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit must be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. This Order retains effluent limitations at least as stringent as those established by the previous order.

## D. Impaired Water Bodies on CWA 303(d) List

In October 2011, USEPA approved a revised list of impaired water bodies prepared pursuant to CWA section 303(d), which requires identification of specific waterbodies where it is expected that water quality standards will not be met after implementation of technology-based effluent limitations on point sources. Where it has not already done so, the Regional Water Board plans to adopt Total Maximum Daily Loads (TMDLs) for pollutants on the 303(d) list. TMDLs establish wasteload allocations for point sources and load allocations for non-point source and are established to achieve the water quality standards for the impaired waterbodies. The SIP requires final effluent limitations for all 303(d)-listed pollutants to be based on total maximum daily loads and associated waste load allocations.

## IV. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source dischargers to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations and other requirements in NPDES permits. There are two principal bases for effluent limitations in 40 CFR: Section 122.44(a) requires that permits include applicable technology-based limitations and standards; and Section 122.44(d) requires that permits include water quality-based effluent limitations to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of the receiving water. Where reasonable potential has been established for a pollutant, but there is no numeric criterion or objective for the pollutant, WQBELs may be established: (1) using USEPA criteria guidance under CWA section 304 (a), supplemented where necessary by other relevant information; (2) on an indicator parameter for the pollutant of concern; or (3) using a calculated numeric water quality criterion, such as a proposed state criterion or policy interpreting the state's narrative criterion, supplemented with other relevant information, as provided in 40 CFR 122.44 (d)(1)(vi).

As noted in Section III, above, other applicable plans and regulations contain specifications that form the basis for the requirements in the Order.

Several specific factors affecting the development of limitations and requirements in this Order are discussed as follows:

### A. Discharge Prohibitions

- 1. Prohibition III.A (Unauthorized discharges of extracted brackish groundwater and reverse osmosis concentrate are prohibited):** This discharge prohibition is based on 40CFR122.21(a), duty to apply, and CWC Section 13260, which requires filing of a report of waste discharge (ROWD) before discharges can occur. Thus, discharges not described in an NOI are prohibited.
- 2. Prohibition III.B (Discharges in excess of the authorized flow rate are prohibited):** This prohibition is retained from the previous order. The basis for the prohibition is the same rationale documented for Prohibition III.A. Dischargers have submitted an NOI that included a description of treatment facility design and the maximum design flow rate, certified by a

professional engineer. When considering authorization, the Regional Water Board will consider the potential erosive effects of the discharge on the receiving water. Flow rate will, therefore, be an important consideration in the authorization process and flows in excess of the design flow rate may result in lowering the reliability of achieving compliance with water quality requirements.

3. **Prohibition III.C (No pollution, contamination, or nuisance):** This prohibition is based on CWC section 13050, and has been retained from the previous order.
4. **Prohibition III.D (No discharges at a volume or velocity that causes erosion and/or scouring):** This prohibition is retained from the previous order and is based on the sediment and erosion control goals of section 4.19 of the Basin Plan.
5. **Prohibition III.E (No discharges of filter backwash water, membrane cleaning solutions, or other waste streams associated with reverse osmosis other than reverse osmosis concentrate):** This prohibition is retained from the previous order. Although this Order authorizes the discharge of groundwater and concentrate resulting from treatment of groundwater by reverse osmosis, this prohibition clarifies that the discharge of filter backwash water, membrane cleaning solutions, or other waste streams associated with reverse osmosis (other than reverse osmosis concentrate) are not authorized by this Order.
6. **Prohibition III.F (No discharges of well drilling fluids):** This prohibition is retained from the previous order. Although the Order authorizes only the discharge of uncontaminated groundwater and concentrate resulting from treatment of uncontaminated groundwater by reverse osmosis, this prohibition clarifies that the discharge of well drilling fluids are not authorized by the Order.
7. **Prohibition III.G (Discharges or groundwater contaminated with volatile organic compounds [VOCs] and fuels are prohibited):** Although this prohibition is obvious, it is included to remind potential dischargers of VOC or fuel contaminated groundwater to apply for coverage under the VOC Fuel General Permit.
8. **Prohibition III.H (No bypass or overflow of untreated or partially treated polluted groundwater):** This is based on 40 CFR 122.41(m) and applicable to structural dewatering requiring treatment before discharging.

## **B. Shallow Water Discharges and Basin Plan Discharge Prohibition 1**

The Basin Plan (Chapter 4, Table 4-1, Discharge Prohibition 1) prohibits discharges not receiving a minimum 10:1 initial dilution or to dead end sloughs. In accordance with the Basin Plan, this Order continues to grant Dischargers an exception to the discharge prohibition for discharges to shallow waters. The exception is based on section 4.2 of the Basin Plan, which states that an exception to Prohibition 1 will be considered where:

“A discharge is approved as part of a groundwater cleanup project, and in accordance with Resolution No. 88-160 ‘Regional Board Position on the Disposal of Extracted Groundwater

from Groundwater Clean-Up Projects,’ and it has been demonstrated that neither reclamation nor discharge to a publicly owned treatment works is technically and economically feasible, and the discharger has provided certification of the adequacy and reliability of treatment facilities and a plan that describes procedures for proper operation and maintenance of all treatment facilities.”

The Basin Plan further states:

“Significant factors to be considered by the Regional Water Board in reviewing requests for exceptions will be the reliability of the discharger’s system in preventing inadequately treated wastewater from being discharged to the receiving water and the environmental consequences of such discharges.”

To comply with the exception, this Order requires Dischargers to document in the NOI that neither reclamation nor discharge to a POTW is technically and economically feasible. In addition, to prevent inadequately treated wastewater from being discharged to receiving waters, Dischargers are required to document in the NOI that the discharge of inadequately treated waste will be reliably prevented.

## **C. Technology-Based Effluent Limitations**

### **1. Scope and Authority**

The CWA requires technology-based effluent limitations (TBELs) based on several levels of controls:

- Best practicable treatment control technology (BPT) represents the average of the best performance by plants within an industrial category or subcategory. BPT standards apply to toxic, conventional, and non-conventional pollutants.
- Best available technology economically achievable (BAT) represents the best existing performance of treatment technologies that are economically achievable within an industrial point source category. BAT standards apply to toxic and non-conventional pollutants.
- Best conventional pollutant control technology (BCT) represents the control from existing point sources of conventional pollutants including BOD, TSS, fecal coliform, pH, and oil and grease. The BCT standard is established after considering the “cost reasonableness” of the relationship between the cost of attaining a reduction in effluent discharge and the benefits that would result, and also the cost effectiveness of additional industrial treatment beyond BPT.
- New source performance standards (NSPS) represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that represent state-of-the-art treatment technology for new sources.

The CWA requires USEPA to develop effluent limitations, guidelines, and standards (ELGs) representing application of BPT, BAT, BCT, and NSPS. Section 402(a)(1) of the CWA and 40

CFR 125.3 authorize the use of Best Professional Judgment (BPJ) to derive TBELs on a case-by-case basis where ELGs are not available for certain industrial categories and/or pollutants of concern. Where BPJ is used, the permit writer must consider specific factors outlined in 40 CFR 125.3.

**2. Applicable Technology-Based Effluent Limitations**

Except for residual chlorine and pH, the Order does not establish TBELs. The effluent chlorine residual limitation limit applies only to the Dischargers that chlorinate their well water. Whether the chlorine limitation applies to a particular facility shall be determined based on its NOI, and confirmed in the Notice of Authorization to Discharge for that facility.

Effluent Limitations for residual chlorine and pH are both pursuant to Table 4-2 (page 4-69) of the Basin Plan. While the Basin Plan defines the effluent limit as 0.0 mg/L, a measurement of 0.05 mg/L is considered a violation. The reporting limit was 0.08 mg/L in the previous permit and originally came from negotiations with water treatment plants. Since that time, the lower 0.05 mg/L reporting limit is considered achievable using chlorine test kits consistent with Standard Methods 4500-Cl F and G. This 0.05 mg/L reporting limit is consistent with that imposed by the Regional Water Board in three other permits. These permits are the San Francisco Public Utilities Commission’s Drinking Water Transmission System Order No. R2-2008-0102, the East Bay Municipal Utility District’s Orinda Water Treatment Plant Order No. R2-2009-0067, and the Municipal Regional Stormwater Permit Order No. 2009-0074.

Regional Water Board staff used BPJ in developing TBELs in this Order. BPJ is defined as the highest quality technical opinion developed by a permit writer after consideration of all reasonably available and pertinent data or information that forms the basis for the terms and conditions of an NPDES permit. The authority for BPJ is contained in CWA section 402(a)(1).

Table F-2, below, summarizes the TBELs established by this Order:

**Table F-2. Summary of Technology-Based Effluent Limitations**

No.	Compound	Units	Limitations Established by BPJ
---	pH	Standard Units	6.5 – 8.5
---	Residual Chlorine	mg/L	0.08 <sup>A</sup>

<sup>A</sup> There shall be no detectable levels of residual chlorine in the effluent; a non-detect using a detection level equal or less than 0.05 milligrams per liter will not be deemed out of compliance.

**D. Water Quality-Based Effluent Limitations (WQBELs)**

WQBELs have been derived to implement WQOs that protect beneficial uses. Both the beneficial uses and the WQOs have been approved pursuant to federal law. The procedures for calculating individual WQBELs are based on the SIP and the Basin Plan. Most Basin Plan beneficial uses and WQOs were approved under State law and submitted to and approved by USEPA prior to May 30, 2000. Any WQOs and beneficial uses submitted to USEPA prior to May 30, 2000, but not approved

by USEPA before that date, are nonetheless “applicable water quality standards for purposes of the [Clean Water] Act” pursuant to 40 CFR 131.21(c)(1). Collectively, this Order’s restrictions on individual pollutants are no more stringent than those required by CWA water quality standards.

## 1. Scope and Authority

- a. 40 CFR 122.44(d)(1)(i) mandates that permits include effluent limitations for all pollutants that are or may be discharged at levels that have reasonable potential to cause or contribute to an excursion of a water quality standard, including numeric and narrative objectives within a standard. As specified in 40 CFR 122.44(d)(1)(i), permits are required to include WQBELs for all pollutants “which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard.”

The process for determining “reasonable potential” and calculating WQBELs when necessary is intended to protect the designated beneficial uses of the receiving water as specified in the Basin Plan, and achieve applicable WQOs contained in other state plans and policies, and applicable WQC contained in the CTR and NTR.

- b. NPDES regulations and the SIP provide the basis to establish Maximum Daily Effluent Limitations (MDELs):
  - (1) NPDES Regulations. NPDES regulations at 40 CFR 122.45(d) state, “For continuous discharges all permit effluent limitations, standards, and prohibitions, including those necessary to achieve water quality standards, shall *unless impracticable* be stated as maximum daily and average monthly discharge limitations for all discharges other than publicly owned treatment works.”
  - (2) SIP. SIP section 1.4 requires WQBELs to be expressed as MDELs and average monthly effluent limitations (AMELs).
- c. MDELs are used in this Order to protect against acute water quality effects. The MDELs are necessary for preventing fish kills or mortality to aquatic organisms.

## 2. Applicable Beneficial Uses and Water Quality Criteria and Objectives

The WQOs applicable to the receiving waters for these discharges are from the Basin Plan; the CTR, established by USEPA at 40 CFR 131.38; and the NTR, established by USEPA at 40 CFR 131.36. Some pollutants have WQOs established by more than one of these three sources:

- a. **Basin Plan.** The Basin Plan specifies numeric WQOs for 10 priority toxic pollutants, as well as narrative WQOs for toxicity and bioaccumulation in order to protect beneficial uses. The pollutants for which the Basin Plan specifies numeric objectives are arsenic, cadmium, chromium (VI), copper in fresh and marine water, lead, mercury, nickel, silver, zinc, and cyanide. The narrative toxicity objective states, “All waters shall be maintained free of toxic substances in concentrations that are lethal to or that produce other

detrimental responses in aquatic organisms.” The bioaccumulation objective states, “Controllable water quality factors shall not cause a detrimental increase in concentrations of toxic substances found in bottom sediments or aquatic life. Effects on aquatic organisms, wildlife, and human health will be considered.” Effluent limitations and provisions contained in this Order are designed to implement these objectives, based on available information.

The Basin Plan also contains a narrative objective for surface waters designated for use as a domestic or municipal supply (MUN) which states that these surface waters shall not contain concentrations of constituents in excess of the maximum contaminant levels (MCLs) or secondary MCLs specified in Title 22 of the California Code of Regulations. Effluent limitations and provisions contained in this Order are designed to implement these objectives, based on available information.

- b. CTR.** The CTR specifies numeric aquatic life criteria for 23 priority toxic pollutants and numeric human health criteria for 57 priority toxic pollutants. These criteria apply to all inland surface waters and enclosed bays and estuaries of the San Francisco Bay Region, although Tables 3-3 and 3-4 of the Basin Plan include numeric objectives for certain of these priority toxic pollutants, which supersede criteria of the CTR (except in the South Bay south of the Dumbarton Bridge).

Human health criteria are further identified as “water and organisms” and “organisms only.” Human health criteria are further identified as “water and organisms” and “organisms only.” Discharges covered by this permit could be to waters with or without a MUN designation. However, since the most stringent WQO for all WQBELs are aquatic life criteria, the WQBELs will apply to all discharges.

- c. NTR.** The NTR establishes numeric aquatic life criteria for selenium and numeric “organisms only” human health criteria for 33 toxic pollutants for waters of San Francisco Bay upstream to, and including Suisun Bay and the San Joaquin-Sacramento River Delta.
- d. Sediment Quality Objectives.** The *Water Quality Control Plan for Enclosed Bays and Estuaries – Part 1, Sediment Quality* contains a narrative WQO, “Pollutants in sediments shall not be present in quantities that, alone or in combination, are toxic to benthic communities in bays and estuaries of California.” This WQO is to be implemented by integrating three lines of evidence: sediment toxicity, benthic community condition, and sediment chemistry. The policy requires that is the Regional Water Board determines that a discharge has reasonable potential to cause or contribute to an exceedance of this WQO, it is to impose the WQO as a receiving water limit.
- e. Basin Plan Receiving Water Salinity Policy.** The Basin Plan (like the CTR and the NTR) states that the salinity characteristics (i.e., freshwater vs. saltwater) of the receiving water are to be considered in determining the applicable WQOs. Freshwater criteria apply to discharges to waters with salinities equal to or less than one part per thousand (ppt) at least 95 percent of the time. Saltwater criteria apply to discharges to waters with

salinities equal to or greater than 10 ppt at least 95 percent of the time in a normal water year. For discharges to water with salinities between these two categories, or tidally influenced freshwaters that support estuarine beneficial uses, the WQOs are the lower of the salt or freshwater WQOs (the latter calculated based on ambient hardness) for each substance.

Receiving waters for this Order are the San Francisco Bay and other estuarine and tidally- influenced waters, and inland freshwaters. Aquatic life criteria were based on the most stringent of the fresh and salt water criteria, to be fully protective of all receiving waters.

- f. Receiving Water Hardness.** Ambient hardness values are used to calculate freshwater WQOs that are hardness dependent. In determining the WQOs for this Order, Regional Water Board staff used a hardness value of 100 mg/L as CaCO<sub>3</sub>, which is a conservative value and generally protective of aquatic life in all circumstances contemplated by the Order.
- g. Site Specific Translators.** NPDES regulations at 40 CFR 122.45(c) require that effluent limitations for metals be expressed as total recoverable metal. Since applicable WQOs for metals are typically expressed as dissolved metal, translators must be used to convert metals concentrations from dissolved to total recoverable and vice versa. The CTR includes default translators; however, site-specific conditions, such as water temperature, pH, suspended solids, and organic carbon greatly affect the form of metal (dissolved, non-filterable, or otherwise) present in the water and therefore available to cause toxicity. In general, the dissolved form of the metal is more available and more toxic to aquatic life than non-filterable forms. Site-specific translators can be developed to account for site-specific conditions, thereby preventing exceedingly stringent or under protective WQOs.

Receiving waters for discharges from the facilities covered under this Order are varied, and therefore site specific conditions are varied. In determining the need for and calculating WQBELs for all metals except for copper and nickel, the Regional Water Board has used default translators established by the USEPA in the CTR at 40 CFR 131.38 (b) (2), Table 2 to be protective in all circumstances. Most discharges are anticipated to eventually enter San Francisco Bay, and therefore, the site specific translators were applied in determining criteria for copper and nickel. For copper, the Regional Water Board applied the SSTs adopted by Regional Water Board Resolution No. R2-2007-0042 for North and Central San Francisco Bay, and the SST contained in the Basin Plan Table 7.2.1-1 for South San Francisco Bay. For nickel, the Regional Water Board applied the translators for North and Central San Francisco Bay based on the recommendation of the Clean Estuary Partnership's *North of Dumbarton Bridge Copper and Nickel Development and Selection of Final Translators* (2005), and applied the translators contained in Table 7.2.1-1 of the Basin Plan for South San Francisco Bay. These translators for copper and nickel are summarized below.

**Table F-3. SSTs for Copper and Nickel for San Francisco Bay**

<i>San Francisco Bay Segment</i>	<b>Copper</b>		<b>Nickel</b>	
	<b>AMEL Translator</b>	<b>MDEL Translator</b>	<b>AMEL Translator</b>	<b>MDEL Translator</b>
North	0.38	0.66	0.27	0.57
Central	0.73	0.87	0.65	0.85
South	0.53	0.53	0.44	0.44

### 3. Determining the Need for WQBELs

Assessing whether a pollutant has Reasonable Potential is the fundamental step in determining whether or not a WQBEL is required.

#### a. Reasonable Potential Methodology

For priority pollutants and most other toxic pollutants, the RPA identifies the observed maximum effluent concentration (MEC) for each pollutant based on effluent concentration data. There are three triggers in determining Reasonable Potential according to SIP Section 1.3:

- (1) The first trigger (Trigger 1) is activated if the MEC is greater than or equal to the lowest applicable WQO ( $MEC \geq WQO$ ), which has been adjusted, if appropriate, for pH, hardness, and translator data. If the MEC is greater than or equal to the adjusted WQO, then that pollutant has Reasonable Potential, and a WQBEL is required.
- (2) The second trigger (Trigger 2) is activated if the observed maximum ambient background concentration (B) is greater than the adjusted WQO ( $B > WQO$ ), and the pollutant is detected in any of the effluent samples ( $MEC > ND$ ).
- (3) The third trigger (Trigger 3) is activated if a review of other information determines that a WQBEL is required to protect beneficial uses, even though both MEC and B are less than the WQO/WQC.

#### b. Effluent Data

The Regional Water Board analyzed the Dischargers' priority pollutant data and the nature of the discharges to determine if discharges have Reasonable Potential. Each Discharger covered under Order No. R2-2007-0033 was required to conduct effluent monitoring pursuant to the Self-Monitoring Program for that order. Effluent data used to conduct this RPA consisted of data submitted as part of each facility's submitted Notice of Intent (NOI) to be covered under NPDES Permit CAG912004. The Regional Water Board analyzed effluent quality data from a total of six Dischargers covering a total of 15 discharge locations in the San Francisco Bay Region, collected from 2007 to 2011, to determine if the discharges have Reasonable Potential in each of the three categories.

From this analysis, it was concluded that the data for metals, such as copper, would be excluded for use in the RPA pursuant to SIP 1.2. The reason is that the metals were detected only occasionally and likely due to false positives from salt interference in the analysis or from natural background in the groundwater. Structural dewatering discharge metals data were also excluded for use in the RPA because a few metals were detected only once and not confirmed during confirmation monitoring and were likely due to the use of contaminated rental treatment equipment.

**c. Ambient Background Data**

The SIP states that, for calculating WQBELs, ambient background concentrations are either the observed maximum ambient water column concentrations or, for objectives intended to protect human health from carcinogenic effects, the arithmetic mean of observed ambient water concentrations. Ambient background concentrations are the observed maximum detected water column concentrations for aquatic life protection.

Because the receiving waters for discharges from the facilities covered under this General Permit are varied, receiving water background concentrations were not considered for this RPA.

**d. Reasonable Potential Determination for Priority Pollutants**

The MECs and the most stringent applicable WQC used in the RPA are presented in the following table, along with the RPA results (yes or no) for each pollutant. Reasonable Potential was not determined for all pollutants because there are not applicable WQC for all pollutants, or monitoring data are not available for others. Based on a review of the effluent data, no reasonable potential was found for Category 1, Category 2, or Category 3 discharges. Tables F-4, F-5, and F-6 present the results of the RPA for each category.

**Table F-4. Summary of RPA Results – Category 1 Discharges**

CTR #	Priority Pollutants	MEC or Minimum DL <sup>[1][2]</sup> (µg/L)	Governing Applicable Criteria (µg/L)				RPA Results <sup>[3]</sup>
			Aquatic Life	Human Health			
			(Most stringent of salt and fresh water)	CTR Water + Organisms	Basin Plan Title 22 MCLs	CTR Organisms Only	
1	Antimony	0.19	---	14	6	4300	No
2	Arsenic	2.2	36	---	10	---	No
3	Beryllium	0.008	---	---	4	---	No
4	Cadmium	0.117	1.1	---	5	---	No
5a	Chromium (III)	8.8	207	---	50	---	No
5b	Chromium (VI)	< 0.5	11	---	---	---	No
6	Copper	5.09	4.7 <sup>[4]</sup>	1300	1000	---	Ud
	Copper	5.09	3.4 <sup>[5]</sup>	1300	1000	---	Ud

CTR #	Priority Pollutants	MEC or Minimum DL <sup>[1][2]</sup> (µg/L)	Governing Applicable Criteria (µg/L)				RPA Results <sup>[3]</sup>
			Aquatic Life	Human Health			
			(Most stringent of salt and fresh water)	CTR Water + Organisms	Basin Plan Title 22 MCLs	CTR Organisms Only	
	Copper	5.09	5.9 <sup>[6]</sup>	1300	1000	---	No
7	Lead	0.918	3.2	---	---	---	No
8	Mercury (303d listed)	0.005	0.025	0.050	2	0.051	No
9	Nickel	12	19 <sup>[7]</sup>	610	100	4600	No
	Nickel	12	13 <sup>[8]</sup>	610	100	4600	No
	Nickel	12	30 <sup>[9]</sup>	610	100	4600	No
10	Selenium (303d listed)	0.59	5.0	---	50	---	No
11	Silver	0.7	2.2	---	---	---	No
12	Thallium	0.004	---	1.7	2.0	6.3	No
13	Zinc	17	86	---	5000	---	No
14	Cyanide	< 0.5	2.9 <sup>[10]</sup>	700	150	220,000	No
53	Pentachlorophenol	< 0.5	7.9	0.28	1	8.2	No
55	2,4,6-Trichlorophenol	< 0.5	---	2.1	---	6.5	No
59	Benzidine	< 0.5	---	0.00012	---	0.00054	No
60	Benzo(a)Anthracene	< 0.5	---	0.0044	---	0.049	No
61	Benzo(a)Pyrene	< 0.5	---	0.0044	0.2	0.049	No
62	Benzo(b)Fluoranthene	< 0.5	---	0.0044	---	0.049	No
64	Benzo(k)Fluoranthene	< 0.5	---	0.0044	---	0.049	No
66	Bis(2-Chloroethyl)Ether	< 0.5	---	0.031	---	1.4	No
68	Bis(2-Ethylhexyl)Phthalate	< 0.5	---	1.8	4	5.9	No
73	Chrysene	< 0.5	---	0.0044	---	0.049	No
74	Dibenzo(a,h)Anthracene	< 0.5	---	0.0044	---	0.049	No
78	3,3-Dichlorobenzidine	< 0.5	---	0.04	---	0.077	No
79	Diethyl Phthalate	< 0.5	---	23,000	---	120,000	No
82	2,4-Dinitrotoluene	< 0.5	---	0.11	---	9.1	No
88	Hexachlorobenzene	< 0.5	---	0.00075	1	0.00077	No
89	Hexachlorobutadiene	< 0.5	---	0.44	---	50	No
91	Hexachloroethane	< 0.5	---	1.9	---	8.9	No
96	N-Nitrosodimethylamine	< 0.5	---	0.00069	---	8.1	No
97	N-Nitrosodi-n-Propylamine	< 0.5	---	0.005	---	1.4	No
100	Pyrene	< 0.5	---	960	---	11,000	No

**Table F-5. Summary of RPA Results – Category 2 Discharges**

CTR #	Priority Pollutants	MEC or Minimum DL <sup>[1][2]</sup>	Governing Applicable Criteria (µg/L)	RPA Results <sup>[3]</sup>
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		(µg/L)	Aquatic Life	Human Health			
			(Most stringent of salt and fresh water)	CTR Water + Organisms	Basin Plan Title 22 MCLs	CTR Organisms Only	
1	Antimony	0.31	---	14	6	4300	No
2	Arsenic	3.12	36	---	10	---	No
3	Beryllium	0.029	---	---	4	---	No
4	Cadmium	0.255	1.1	---	5	---	No
5a	Chromium (III)	1.14	207	---	50	---	No
6	Copper	1	4.7 <sup>[4]</sup>	1300	1000	---	No
	Copper	1	3.4 <sup>[5]</sup>	1300	1000	---	No
	Copper	1	5.9 <sup>[6]</sup>	1300	1000	---	No
7	Lead	0.011	3.2	---	---	---	No
8	Mercury (303d listed)	0.0054	0.025	0.050	2	0.051	No
9	Nickel	1	19 <sup>[7]</sup>	610	100	4600	No
	Nickel	1	13 <sup>[8]</sup>	610	100	4600	No
	Nickel	1	30 <sup>[9]</sup>	610	100	4600	No
10	Selenium (303d listed)	0.225	5.0	---	50	---	No
11	Silver	0.49	2.2	---	---	---	No
12	Thallium	0.018	---	1.7	2.0	6.3	No
13	Zinc	15.1	86	---	5000	---	No
14	Cyanide	2.8	2.9 <sup>[10]</sup>	700	150	220,000	No

**Table F-6. Summary of RPA Results – Category 3 Discharges**

CTR #	Priority Pollutants	MEC or Minimum DL <sup>[1][2]</sup> (µg/L)	Governing Applicable Criteria (µg/L)				RPA Results <sup>[3]</sup>
			Aquatic Life	Human Health			
			(Most stringent of salt and fresh water)	CTR Water + Organisms	Basin Plan Title 22 MCLs	CTR Organisms Only	
1	Antimony	0.33	---	14	6	4300	No
2	Arsenic	1.8	36	---	10	---	No
3	Beryllium	< 0.1	---	---	4	---	No
4	Cadmium	0.062	1.1	---	5	---	No
5a	Chromium (III)	0.32	207	---	50	---	No
5b	Chromium (VI)	< 0.1	11	---	---	---	No
6	Copper	3.0	4.7 <sup>[4]</sup>	1300	1000	---	No
	Copper	3.0	3.4 <sup>[5]</sup>	1300	1000	---	No
	Copper	3.0	5.9 <sup>[6]</sup>	1300	1000	---	No
7	Lead	0.59	3.2	---	---	---	No
8	Mercury (303d listed)	0.00133	0.025	0.050	2	0.051	No
9	Nickel	4	19 <sup>[7]</sup>	610	100	4600	No
	Nickel	4	13 <sup>[8]</sup>	610	100	4600	No

CTR #	Priority Pollutants	MEC or Minimum DL <sup>[1][2]</sup> (µg/L)	Governing Applicable Criteria (µg/L)				RPA Results <sup>[3]</sup>
			Aquatic Life	Human Health			
			(Most stringent of salt and fresh water)	CTR Water + Organisms	Basin Plan Title 22 MCLs	CTR Organisms Only	
	Nickel	4	30 <sup>[9]</sup>	610	100	4600	No
10	Selenium (303d listed)	0.78	5.0	---	50	---	No
13	Zinc	27	86	---	5000	---	No
14	Cyanide	<2.0	2.9 <sup>[10]</sup>	700	150	220,000	No

**Footnotes for Tables F-4, F-5, and F-6:**

- [1] The Maximum Effluent Concentration (MEC) is the actual detected concentration unless preceded by a “<” sign, in which case the value shown is the minimum detection level (DL).
- [2] The tables only include results for parameters reported in NOIs submitted by the Dischargers in each Category.
- [3] RPA Results = Yes, if MEC > WQO/WQC, B > WQO/WQC and MEC is detected, or Trigger 3;  
 = No, if MEC and B are < WQO/WQC or all effluent data are undetected;  
 = Undetermined (Ud), if no criteria have been promulgated or there are insufficient data. For metals, specifically copper, Ud was determined because as noted previously the reported discharge data were excluded for use in RPA pursuant to SIP 1.2. Though the detected levels are high as shown in the MECs above, these were in just a few samples. Metals and cyanide were detected only occasionally and generally at low levels likely from analytical interference from salinity in the sample, or natural background in the groundwater extracted. Because this Order would exclude coverage for sites where there is persistent metals contamination, and the relative small load of background metals to the Bay from all the discharges, a finding of undetermined is appropriate.
- [4] Criterion based on the Basin Plan marine SSO for copper and the site-specific translators (0.53 acute and chronic) for the Lower and South Bay.
- [5] Criterion based on the Basin Plan marine SSO for copper and the site-specific translators (0.87 acute, 0.73 chronic) for the Central Bay.
- [6] Criterion based on the Basin Plan marine SSO for copper and the site-specific translators (0.66 acute, 0.38 chronic) for Suisun and San Pablo Bay.
- [7] Criterion based on the Basin Plan marine SSO for nickel and the site-specific translators (0.44 acute and chronic) for the Lower and South Bay.
- [8] Criterion based on the Basin Plan marine WQO for nickel and the site-specific translators (0.85 acute, 0.65 chronic) for the Central Bay.
- [9] Criterion based on the Basin Plan marine WQO for nickel and the site-specific translators (0.57 acute, 0.27 chronic) for Suisun and San Pablo Bay.
- [10] Criterion based on the Basin Plan marine SSO for cyanide.

**e. Constituents with Limited Data**

In some cases, Reasonable Potential cannot be determined because effluent data are limited, or ambient background concentrations are unavailable. When additional data become available, further RPA will be conducted to determine whether numeric effluent limitations are necessary.

**f. Pollutants with No Reasonable Potential**

WQBELs are not included in this Order for constituents that do not demonstrate Reasonable Potential; however, monitoring for those pollutants is still required. If concentrations of these constituents are found to have increased significantly, the Discharger will be required to investigate the sources of the increases. Remedial measures are required if the increases pose a threat to receiving water quality.

**g. RPA Determination for Sediment Quality Objectives**

Pollutants in some receiving water sediments may be present in quantities that alone or in combination are toxic to benthic communities. Efforts are underway to identify stressors

causing such conditions. However, to date there is no evidence directly linking compromised sediment conditions to the discharges subject to this Order; therefore the Regional Water Board cannot draw a conclusion about Reasonable Potential for the discharges to cause or contribute to exceedances of the sediment quality objectives. Nevertheless, the Regional Monitoring Program (RMP) conducted by the San Francisco Estuary Institute continues to monitor San Francisco Bay sediment and seeks to identify stressors responsible for degraded sediment quality. Thus far, the monitoring has provided only limited information about potential stressors and sediment transport. The Regional Water Board is exploring appropriate requirements to impose on dischargers in the region, to obtain additional information that may inform future RPAs.

#### **4. WQBEL Calculations**

##### **a. Development of WQBELs for Specific Pollutants.**

For the CTR pollutants, no Reasonable Potential was determined as described above so no WQBEL is necessary.

#### **5. Whole Effluent Toxicity (WET)**

The Basin Plan requires dischargers to either conduct flow-through effluent toxicity tests or perform static renewal bioassays (Chapter 4, Acute Toxicity) to measure the toxicity of wastewaters and to assess negative impacts upon water quality and beneficial uses caused by the aggregate toxic effect of the discharge of pollutants. This Order retains the effluent limitation for whole effluent acute toxicity. Compliance evaluation with these limitations is based on 96-hour static-renewal bioassays. All bioassays shall be performed according to the USEPA-approved method in 40 CFR Part 136, currently “*Methods for Measuring the Acute Toxicity of Effluents and Receiving Water, 5th Edition.*”

#### **6. Anti-Backsliding and Antidegradation**

Effluent limitations in this Order comply with anti-backsliding and antidegradation requirements because all effluent limitations are as least as stringent as the limitations contained in the previous General Permit.

#### **E. Reclamation Specifications**

Reclamation Specifications are retained from the previous General Permit. Reclamation specifications are required because reuse of treated groundwater is a preferred method of disposal. The basis for these requirements is Resolution No. 88-160.

### **V. RATIONALE FOR RECEIVING WATER LIMITATIONS**

#### **A. Surface Water Limitations**

Receiving water limitations are based on the narrative and numerical objectives contained in Chapter 3 of the Basin Plan and as identified in Section V.A of this Order. The receiving water limit for turbidity has been made more stringent relative to the previous order for consistency with the Municipal Regional Stormwater Permit R2-2009-0074, Provision C.15.b.(2).

## **B. Groundwater Limitations**

Not Applicable.

## **VI. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS**

The principal purposes of a monitoring program are to:

- Document compliance with waste discharge requirements and prohibitions established by the Regional Water Board,
- Facilitate self-policing by the Discharger in the prevention and abatement of pollution arising from waste discharge,
- Develop or assist in the development of limitations, discharge prohibitions, national standards of performance, pretreatment and toxicity standards, and other standards, and
- Prepare water and wastewater quality inventories.

The Monitoring and Reporting Program is a standard requirement in almost all NPDES permits issued by the Regional Water Board, including this Order. It contains definitions of terms and sets out requirements for reporting of routine monitoring data in accordance with NPDES regulations, the CWC, and State and Regional Water Board policies. The Monitoring and Reporting Program also defines the sampling stations and frequency, the pollutants to be monitored, and additional reporting requirements. Pollutants to be monitored include all parameters for which effluent limitations are specified. Monitoring for additional constituents, for which no effluent limitations are established, is also required to provide data for future completion of RPAs.

The following provides the rationale for the monitoring and reporting requirements contained in the Monitoring and Reporting Program for the facilities covered under this Order.

### **A. Influent Monitoring**

No influent monitoring is required by the Order, unless effluent violations or trigger constituent values are exceeded in the previous self-monitoring report. In that event, influent monitoring would be required as an investigatory to determine the cause of the exceedance.

### **B. Effluent Monitoring**

The purpose of effluent monitoring is to determine compliance with effluent limitations and to allow ongoing characterization of discharges to determine potential adverse impacts and to determine continued suitability for coverage under the Order. Effluent monitoring data can also indicate if one or more pollutants are detected at levels less than effluent limits, but greater than trigger levels, which may indicate poor maintenance or other unexpected problems. All effluent monitoring

requirements are retained from the previous order. In addition to discharge rate, effluent is monitored for hardness, pH, total suspended solids, total dissolved solids, salinity and turbidity. If chlorine is applied to well water, chlorine monitoring is required to assure that no measurable chlorine residual remains in effluent. Acute toxicity monitoring is required to determine compliance with effluent limitations and as a general measure of effluent quality. Monitoring is also required for the metals and other priority, toxic pollutants which have water quality criteria established by the NTR and CTR.

### **C. Whole Effluent Toxicity Testing Requirements**

The selected test species and frequency of testing are specified in Basin Plan page 4-9 and Table 4-4 and are the same as previous permit and appropriately cost effective for the Dischargers covered under this Order.

### **D. Receiving Water Monitoring**

The purpose of receiving water monitoring is to provide documentation about the condition of the receiving water should any effluent limit violations occur that may harm the life in the receiving water. The receiving water monitoring frequency is the same as previous permit. For a majority of the constituents, monitoring is only required by the Order if effluent violations or trigger constituent values are exceeded in the previous self-monitoring report. The exceptions are flow rate, salinity, and turbidity, which dischargers are required to monitor on a quarterly basis.

### **E. Other Monitoring Requirements**

The purpose of additional monitoring requirements is to investigate complaints, identify the discharges that should be regulated by individual NPDES permits, coordinate stormwater monitoring with municipalities, and quantify potential impacts of extracted and treated groundwater discharge on the receiving water and the ambient conditions of the receiving waters.

### **F. Reporting Requirements**

Reporting requirements are included in the Monitoring and Reporting Program. The reporting requirements establish requirements for report submittal format.

## **VII. RATIONALE FOR PROVISIONS**

### **A. Standard Provisions (Provision VI.A)**

Standard Provisions, which in accordance with 40 CFR 122.41 and 122.42 apply to all NPDES discharges and must be included in every NPDES permit, are provided in Attachments D of this Order. 40 CFR 122.41(a)(1) and (b) through (n) establish conditions that apply to all state-issued NPDES permits. These conditions must be incorporated into the permits either expressly or by reference. 40 CFR 123.25(a)(12) allows the state to omit or modify conditions to impose more stringent requirements. The Regional Standard Provisions (Attachment G) supplement the Federal Standard Provisions. In accordance with 40 CFR 123.25, this Order omits federal

conditions that address enforcement authority specified in 40 CFR 122.41(j)(5) and (k)(2) because the CWC enforcement authority is more stringent. In lieu of these conditions, this Order incorporates by reference CWC Section 13387(e).

## **B. Monitoring and Reporting Program Requirements (Provision VI.B)**

The Discharger is required to monitor the permitted discharge in order to evaluate compliance with permit conditions. Monitoring requirements are contained in the Monitoring and Reporting Program (Attachment E), Standard Provisions (Attachment D), and Regional Standard Provisions (Attachment G). This provision requires compliance with these documents and is authorized by 40 CFR 122.41(h) and (j), and CWC sections 13267 and 13383.

## **C. Special Provisions (Provision VI.C)**

- 1. Reopener Provisions.** These reopener provisions are based on 40 CFR 122.63 and allow modification of this Order and its effluent limitations as necessary in response to updated WQOs, regulations, or other new relevant information that may be established in the future and other circumstances allowed by law.
- 2. Notice of Intent (NOI) Application.** Provision VI.C.2, Notice of Intent (NOI) Application, is based on 40 CFR 122.28(b).
- 3. NOI Review.** Provision VI.C.3, NOI Review, is based on 40 CFR 122.28(b).
- 4. Discharge Authorization.** Provision VI.C.4, Discharge Authorization, is based on 40 CFR 122.28(b).
- 5. Non-Compliance is a Violation.** Provision VI.C.5, Non-Compliance is a Violation, is based on 40 CFR 122.41(a).
- 6. Triggers.** Provision VI.C.6. In general, the Dischargers authorized under this Order are expected to use Best Management Practices (BMPs) to reduce the potential negative impacts of pollutants in their discharges. However, some pollutants may be detected in the effluent of some of the treatment or discharge systems. These pollutants include both organic and inorganic compounds. The purpose of these provisions is to require Dischargers to do additional activities should any pollutants exceed the triggers in Table 2. These triggers are not effluent limitations and should not be construed as such. Instead, they are levels at which additional investigation is warranted to determine whether a numeric limit for a particular pollutant is necessary. The Table 2, Column A concentration-based triggers for discharges to freshwater bodies are set at the lowest value of the following: Basin Plan Table 3-6 Water Quality Objectives for Agricultural Supply, State Maximum Contaminant Levels, Federal Maximum Contaminant Levels, California Toxics Rule lowest freshwater criterion, or California Toxics Rule criterion for drinking the water and fish consumption. The Table 2, Column B concentration-based triggers for discharges to the Bay/Estuary are set at the lowest value of the following: California Toxics Rule lowest saltwater criterion, California

Toxics Rule lowest freshwater criterion, or California Toxics Rule criterion for fish consumption. The reason for this approach is explained below:

- a. Triggers for Inorganic Compounds.** Antimony, arsenic, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver, thallium, and zinc (hereinafter called inorganic compounds) may be present in groundwater-dewatering discharges, primarily due to background concentrations in the groundwater being extracted. Water Board staff's best professional judgment is that the loading of inorganic compounds from discharges covered by this Order is negligible when compared to loadings from municipal and industrial point-source discharges and stormwater discharges. Based on an analysis documented in the Fact Sheet for Order No. R2-2001-0100, the Regional Water Board has concluded that Bay-wide inorganic compounds loading from extracted brackish groundwater and reverse osmosis concentrate resulting from the treatment of groundwater by reverse osmosis and discharge or reuse of extracted and treated groundwater resulting from structural dewatering represents a very small portion of total inorganic compounds loadings from sources within the Region (including municipal and industrial point-source discharges and stormwater discharges), and therefore, shall cause no impairment of beneficial uses or potential exceedances of inorganic compounds objectives in receiving waters. Therefore, it is acceptable to utilize the trigger monitoring system for these compounds instead of designating them as effluent limits.

Facilities where inorganic compounds have adversely impacted groundwater are not eligible for coverage under this Order. Each Discharger shall submit, as part of the NOI for proposed discharge, analytical results including inorganic compounds concentrations in the influent and effluent, if available, or maximum concentrations in any individual extraction wells, if not operating yet. Based on these data, the Discharger may receive a discharge authorization letter. In some cases after starting up an extraction and treatment system, the effluent concentration of some inorganic compounds may exceed the triggers listed in Table 2. In this case, the Discharger shall take three additional samples and have them analyzed for the inorganic compound of concern and comply with the Provisions VI.C.7, VI.C.8, or VI.C.9.

Triggers for copper and nickel have been updated in the Order from the previous Order to reflect the recently adopted SSOs and SSTs for copper throughout San Francisco Bay, and the SSOs and SSTs for nickel in the South Bay.

- b. Triggers for Organic Compounds.** Dischargers authorized under this Order are expected to use BMPs. Sites where pesticides or other conservative pollutants, such as mercury that does not readily degrade in the environment, have adversely impacted groundwater are not eligible for coverage under this Order. It is possible that organic compounds may be detected in the effluent of some of the discharge systems. This could be due to the movement of the contaminated groundwater from a neighboring site into the capture zone of the facility authorized under this Order, and may occur after discharge has been authorized, and groundwater is mobilized. Table 2 contains concentration-based triggers for conducting additional activities when the trigger compounds have been detected above the trigger value. This provision would allow

Dischargers to continue the discharge while investigating the toxicity and ability to treat any detected volatile or semi-volatile organic compounds, in excess of Table 2 triggers. If a Discharger detects any fuels or solvent-related pollutants in the effluent or any extraction wells, the Discharger shall apply for discharge authorization under general NPDES No. CAG912002 (VOC Fuel General Permit).

**Table F-7. Basis for Table 2 Trigger Compounds**

Pollutant	CAS Number	Agricultural (µg/L) [1]	Minimum State/Federal MCL (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Water & Organisms (µg/L) [1]	Column A Trigger (µg/L) [1],[6]	CTR Lowest Saltwater Criterion (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Organisms Only (µg/L) [1]	Column B Trigger for Discharges to Bay/Estuary (µg/L) [1],[6]
Turbidity (units)	---	---	5	---	---	5	---	---	---	---
Total Dissolved Solids (TDS)	---	10,000,000	500,000	---	---	500,000	---	---	---	---
Conductivity (mmhoms/cm)	---	200	900	---	---	200	---	---	---	---
Chloride	---	142,000	250,000	---	---	142,000	---	---	---	---
Total Solids (TS) – TDS (this trigger is based on BPJ)						30,000				30,000
Antimony	7440360	---	6	---	14	6	---	---	4,300	4,300
Arsenic	7440382	100	10	150	---	10	36	150	---	36
Beryllium	7440417	100	4	---	---	4	---	---	---	---
Cadmium	7440439	---	5	2.2	---	2.2	9.3	2.2	---	2.2
Chromium (Total)	18540299	100	50	180	---	11	---	180	---	11
Chromium (VI)	18540299	---	---	11	11	11 <sup>[2]</sup>	50	11	---	11
Copper <sup>[3]</sup>	7440508	---	1000	20	---	20	5.9	20	---	5.9
Copper <sup>[4]</sup>	7440508	---	1000	12	---	12	3.4	12	---	3.4
Copper <sup>[5]</sup>	7440508	---	1000	17	---	17	4.7	17	---	4.7
Lead	7439921	5,000	15	2.5	---	2.5	8.1	2.5	---	2.5
Mercury	7439976	---	2	0.025	0.050	0.025	0.025	---	0.051	0.025
Nickel <sup>[3]</sup>	7440020	200	100	193	610	100	30	193	4,600	30
Nickel <sup>[4]</sup>	7440020	200	100	80	610	80	13	80	4,600	13
Nickel <sup>[5]</sup>	7440020	200	100	118	610	100	19	118	4,600	19
Selenium	7782492	20	50	5.0	5.0	5.0	71	5.0	---	5.0
Silver	7440224	---	100	3.4	---	3.4	1.9	3.4	---	1.9
Thallium	7440280	---	2	---	1.7	1.7	---	---	6.3	6.3
Zinc	7440666	2,000	5000	120	---	120	81	128	---	81
Cyanide	57125	---	150	5.2	5.2	5.2	2.9 [7]	5.2	220,000	2.9
Asbestos	1332214	---	7 MFL	---	7 MFL	7 MFibers/L	---	---	---	---
2,3,7,8-TCDD	1746016	---	0.00003	---	1.3E-08	1.3E-08	---	---	1.4E-08	1.4E-08
Acrylonitrile	107131	---	---	---	0.059	0.059	---	---	0.66	0.66
Bromoform	75252	---	80	---	4.3	4.3	---	---	360	360
Chlorodibromo methane	124481	---	80	---	0.401	0.401	---	---	34	34
Dichlorobromo methane	75274	---	80	---	0.56	0.56	---	---	46	46
1,2-Dichloropropan	78875	---	5	---	0.52	0.52	---	---	39	39

Pollutant	CAS Number	Agricultural (µg/L) [1]	Minimum State/Federal MCL (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Water & Organisms (µg/L) [1]	Column A Trigger (µg/L) [1],[6]	CTR Lowest Saltwater Criterion (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Organisms Only (µg/L) [1]	Column B Trigger for Discharges to Bay/Estuary (µg/L) [1],[6]
e										
1,3-Dichloropropylene	542756	---	0.5	---	10	0.5	---	---	1,700	1,700
1,1,2,2-Tetrachloroethane	79345	---	1	---	0.17	0.17	---	---	11	11
Pentachlorophenol	87865	---	1	15	0.28	0.28	7.9	15	8.2	8.2
2,4,6-Trichlorophenol	88062	---	---	---	2.1	2.1	---	---	6.5	6.5
Benzidine	92875	---	---	---	0.00012	0.00012	---	---	0.00054	0.00054
Benzo(a)anthracene	56553	---	---	---	0.0044	0.0044	---	---	0.049	0.049
Benzo(a)pyrene	50328	---	0.2	---	0.0044	0.0044	---	---	0.049	0.049
Benzo(b)fluoranthene	205992	---	---	---	0.0044	0.0044	---	---	0.049	0.049
Benzo(k)fluoranthene	207089	---	---	---	0.0044	0.0044	---	---	0.049	0.049
Bis(2-chloroethyl)ether	111444	---	---	---	0.031	0.031	---	---	1.4	1.4
Bis(2-ethylhexyl)phthalate	117817	---	---	---	1.8	1.8	---	---	5.9	5.9
Chrysene	218019	---	---	---	0.0044	0.044	---	---	0.049	0.049
Dibenzo(a,h)anthracene	53703	---	---	---	0.0044	0.0044	---	---	0.049	0.049
3,3'-Dichlorobenzidine	91941	---	---	---	0.04	0.04	---	---	0.077	0.077
2,4-Dinitrotoluene	121142	---	---	---	0.11	0.11	---	---	9.1	9.1
1,2-Diphenylhydrazine	122667		---	---	0.040	0.040	---	---	0.54	0.54
Hexachlorobenzene	118741	---	1	---	0.00075	0.00075	---	---	0.00077	0.00077
Hexachlorobutadiene	87683	---	---	---	0.44	0.44	---	---	50	50
Hexachloroethane	67721	---	---	---	1.9	1.9	---	---	8.9	8.9
Indeno(1,2,3-c,d)pyrene	193395	---	---	---	0.0044	0.0044	---	---	0.049	0.049
N-nitrosodimethylamine	62759	---	---	---	0.00069	0.00069	---	---	8.1	8.1
N-nitrosodi-n-propylamine	621647	---	---	---	0.005	0.005	---	---	1.4	1.4
Aldrin	309002	---	---	3	0.00013	0.00013	1.3	3	0.00014	0.00014
alpha-BHC	319846	---	---	---	0.0039	0.0039	---	---	0.013	0.013
beta-BHC	319857	---	---	---	0.014	0.014	---	---	0.046	0.046
gamma-BHC	58899	---	0.2	---	0.019	0.019	---	---	0.063	0.063

Pollutant	CAS Number	Agricultural (µg/L) [1]	Minimum State/Federal MCL (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Water & Organisms (µg/L) [1]	Column A Trigger (µg/L) [1],[6]	CTR Lowest Saltwater Criterion (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Organisms Only (µg/L) [1]	Column B Trigger for Discharges to Bay/Estuary (µg/L) [1],[6]
Chlordane	57749	---	0.1	0.0043	0.00057	0.00057	0.004	0.0043	0.00059	0.00059
4,4-DDT	50393	---	---	0.001	0.00059	0.00059	0.001	0.001	0.00059	0.00059
4,4-DDE	72559	---	---	---	0.00059	0.00059	---	---	0.00059	0.00059
4,4-DDD	72548	---	---	---	0.00083	0.00083	---	---	0.00084	0.00084
Dieldrin	60571	---	---	0.056	0.00014	0.00014	0.0019	0.056	0.00014	0.00014
alpha-Endosulfan	959988	---	---	0.056	110	0.056	0.0087	0.056	240	0.0087
beta-Endosulfan	33213659	---	---	0.056	110	0.056	0.0087	0.056	240	0.0087
Endrin	72208	---	2	0.036	0.076	0.036	0.0023	0.036	0.81	0.0023
Endrin aldehyde	7421934	---	---	---	0.76	0.76	---	---	0.81	0.81
Heptachlor	76448	---	0.01	0.0038	0.00021	0.00021	0.0036	0.0038	0.00021	0.00021
Heptachlor epoxide	1024573	---	0.01	0.0038	0.00010	0.00010	0.0036	0.0038	0.00011	0.00011
PCBs, sum	1336363	---	0.5	0.014	0.00017	0.00017	0.03	0.014	0.00017	0.00017
Toxaphene	8001352	---	3	0.0002	0.00073	0.0002	0.0002	0.0002	0.00075	0.0002
Turbidity (NTU)	---	---	5	---	---	5	---	---	---	---
Odor-Threshold (Units)	---	---	3	---	---	3	---	---	---	---
Sulfate	---	---	250,000	---	---	250,000	---	---	---	---
Foaming agents	---	---	500	---	---	500	---	---	---	---
Color (units)	---	---	15	---	---	15	---	---	---	---
Aluminum	---	5,000	---	---	---	5,000	---	---	---	---
Boron	---	500	---	---	---	500	---	---	---	---
Cobalt	---	50	---	---	---	50	---	---	---	---
Fluoride	---	1,000	---	---	---	1,000	---	---	---	---
Iron	---	5,000	300	---	---	300	---	---	---	---
Lithium	---	2,500	---	---	---	2,500	---	---	---	---
Manganese	---	200	50	---	---	50	---	---	---	---
Molybdenum	---	10	---	---	---	10	---	---	---	---
Nitrate (as NO3)	---	---	45,000	---	---	45,000	---	---	---	---
Nitrate + Nitrite (as N) NO3 + NO2 (as N)	---	5,000	10,000	---	---	5,000	---	---	---	---
Nitrite (as N)	---	---	1,000	---	---	1,000	---	---	---	---
Vanadium	---	100	---	---	---	100	---	---	---	---
Combined Radium-226 and Radium-228 (in pCi/l)	---	---	5	---	---	5	---	---	---	---
Gross Alpha Particle (includes Radium-226 but excludes Radon and Uranium)	---	---	15	---	---	15	---	---	---	---

Pollutant	CAS Number	Agricultural (µg/L) [1]	Minimum State/Federal MCL (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Water & Organisms (µg/L) [1]	Column A Trigger (µg/L) [1],[6]	CTR Lowest Saltwater Criterion (µg/L) [1]	CTR Lowest Freshwater Criterion (µg/L) [1]	CTR Criteria Organisms Only (µg/L) [1]	Column B Trigger for Discharges to Bay/Estuary (µg/L) [1],[6]
in pCi/l)										
Tritium (in pCi/l)	---	---	20,000	---	---	20,000	---	---	---	---
Strontium-90 (in pCi/l)	---	---	8	---	---	8	---	---	---	---
Gross Beta Particle Activity (in pCi/l)	---	---	50	---	---	50	---	---	---	---
Uranium (in pCi/l)	---	---	20	---	---	20	---	---	---	---
Fuels and Solvents Related Pollutants	---	---	---	---	---	Apply for NPDES No. CAG912002	---	---	---	Apply for NPDES No. CAG912002
Footnotes for Table F-7:										
[1] Unit is µg/L unless noted otherwise right after the name of pollutant										
[2] If total chromium concentration exceeds 11 µg/L, then analysis for chromium(VI) shall also be conducted										
[3] Applicable to Suisun Bay and San Pablo Bay segments of San Francisco Bay.										
[4] Applicable to Central Bay and Lower Bay segments of San Francisco Bay.										
[5] Applicable to South San Francisco Bay, south of Hayward Shoals.										
[6] If a discharger is reporting non-detect monitoring data with a reporting level higher than the trigger, the reason for the higher detection level shall be consistent with the SIP Appendix 4 required minimum levels (please refer to our web site for the latest version of SIP) and must be explained within the monitoring report.										
[7] Basin Plan Table 3-3C marine Site Specific objective										

**8. Individual NPDES Permit May Be Required.** Provision VI.C.11 is retained from the previous order and is based on 40 CFR 122.28(b)(3).

**VIII. PUBLIC PARTICIPATION**

The California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board) is considering the reissuance of general waste discharge requirements (GWDRs) that will serve as a General NPDES Permit. As a step in the GWDRs adoption process, the Regional Water Board has developed tentative GWDRs. The Regional Water Board encourages public participation in the GWDR adoption process.

**A. Notification of Interested Parties**

The Regional Water Board has notified the Dischargers and interested agencies and persons of its intent to prescribe GWDRs for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Notification was provided through the Recorder on May 14, 2012.

## **B. Written Comments**

Staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative GWDRs. Comments should be submitted either in person or by mail to the Executive Officer at the Regional Water Board at the address above on the cover page of this Order.

To be fully responded to by staff and considered by the Regional Water Board, written comments should be received at the Regional Water Board offices by 5:00 p.m. on June 12, 2012.

## **C. Public Hearing**

The Regional Water Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date: August 8, 2012  
Time: 9:00 a.m.  
Location: Elihu Harris State Building (1st Floor auditorium)  
1515 Clay Street  
(Walking distance from City Center 12<sup>th</sup> Street BART station)  
Oakland, CA 94612

Interested persons are invited to attend. At the public hearing, the Regional Water Board will hear testimony, if any, pertinent to the discharge, GWDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

Please be aware that dates and venues may change. Our web address is <http://www.waterboards.ca.gov/sanfranciscobay> where you can access the current agenda for changes in dates and locations.

## **D. Waste Discharge Requirements Petitions**

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Water Board regarding the final GWDRs. The petition must be submitted within 30 days of the Regional Water Board's action to the following address:

State Water Resources Control Board  
Office of Chief Counsel  
P.O. Box 100, 1001 I Street  
Sacramento, CA 95812-0100

## **E. Information and Copying**

Report of Waste Discharges, related documents, tentative effluent limitations and special provisions, comments received, and other information are on file and may be inspected at the address above during regular office hours, which are generally weekdays from 8:00 a.m. to 5:00 p.m., excluding 12:00 p.m. to 1:00 p.m. lunch hours and holidays. Copying of documents may be arranged through the Regional Water Board by calling (510) 622-2300.

#### **F. Register of Interested Persons**

Any person interested in being placed on the mailing list for information regarding the GWDRs and NPDES permit should contact the Regional Water Board, reference this facility, and provide a name, address, and phone number.

#### **G. Additional Information**

Requests for additional information or questions regarding this order should be directed to **Farhad Azimzadeh at (510) 622-2310 or by e-mail at [fazimzadeh@waterboards.ca.gov](mailto:fazimzadeh@waterboards.ca.gov)**.



**CalEEMod<sup>®</sup>**

**California Emissions Estimator Model<sup>®</sup>**

Appendix A  
Calculation Details for  
CalEEMod

Prepared for:  
**California Air Pollution Control Officers  
Association (CAPCOA)**

Prepared by:  
**ENVIRON International Corporation  
San Francisco, California  
and  
California Air Districts**

Revised:  
**July 2013  
CalEEMod v.2013.2**  
*(Previous version February 2011)*

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# 1 Overview of Program

In 2010, ENVIRON International Corporation (ENVIRON) worked with the South Coast Air Quality Management District (SCAQMD), in collaboration with the other air districts in California, to create a new software program, California Emissions Estimator Model (CalEEMod), that calculates air and greenhouse gas (GHG) emissions associated with land use projects. This document provides the detailed methodologies and data source references that are used in the software program. CalEEMod calculates both the criteria emissions and greenhouse gas emissions associated with construction and operational sources as part of development projects. In addition it calculates GHG emissions associated with one-time changes in vegetation land use. These emission estimates can be used for quantification and reporting as part of the California Environmental Quality Act (CEQA) environmental impact reports and other environmental documentation.

This Appendix A serves as the basis for all methods and assumptions for calculating all emission categories. These category modules include construction, operational energy use, operational mobile sources, operational landscape maintenance, operational consumer product use, operational architectural coating use, operational hearth use, indirect emissions from water and wastewater use, vegetation carbon sequestration, and emissions associated with solid waste disposal.

## 1.1 Structure of this document

This Appendix will discuss each major module in detail with appropriate subdivisions. These major modules include the following:

- Project Characteristics
- Land Use
- Construction
- Operational Mobile
- Operational Area Sources
- Energy Use
- Water and Wastewater
- Solid Waste
- Vegetation
- Mitigation
- Results

## 2 Project Characteristics

The Project Characteristics screen has no calculations associated with it. It is used to provide information on appropriate default values in subsequent screens. A detailed description of this

screen and the areas requiring user input is given in the User's Guide main text. Some further information regarding some of the inputs are below.

- Mendocino County requested county subdivisions as follows:
  - Inland
  - Coastal
  - Rural Inland North
  - Rural Inland South
- Santa Barbara County requested county subdivisions as follows:
  - North Santa Barbara County: North of Santa Ynez range
  - South Santa Barbara County: South of Santa Ynez range
- Wind speeds are from District supplied information, nearby weather stations if easily identifiable<sup>1</sup>, or a default of 2.2 m/s.
- Precipitation Frequency was based on data from the Western Regional Climate Center (WRCC)<sup>2</sup> which is an average of all of the stations found in that county, air basin, or district.

## 2.1 Utility Information

Several of the modules require an estimation of the indirect GHG emissions associated with supplying electricity to the Project site. The end user will need to specify the utility company that will be providing electricity to the Project. The default carbon intensities for the major utility companies as well as a state-wide default are based on Table G6 of the California Air Resources Board (ARB) Local Government Operation Protocol version 1.1 or the latest public utilities inventory reports. This is consistent with recommendations in the California Air Pollution Control Officer Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures document. The complete list of the utilities powering California and the reporting year from which the CO<sub>2</sub> intensity factor currently used in CalEEMod can be found in Table 1.2 in Appendix D. The CH<sub>4</sub> and N<sub>2</sub>O values are based on E-grid values for the region since more refined data is not readily available. The end user will also be able to provide an alternative value that is recommended by the local agency, if applicable.

## 2.2 Criteria Pollutants

The criteria pollutants are those pollutants or precursor pollutants to the chemicals that have National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). These pollutants are listed below:

- Particulate Matter: The program will define both Particulate Matter with aerodynamic radius less than 10 microns (PM<sub>10</sub>) and Particulate Matter with aerodynamic radius less than 2.5

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<sup>1</sup> <http://www.wrcc.dri.edu/htmlfiles/westwind.final.html>

<sup>2</sup> <http://www.wrcc.dri.edu/htmlfiles/ca/ca.01.html>

microns (PM<sub>2.5</sub>). Since emission factors for PM<sub>2.5</sub> have not been fully defined, the conversion assumption for each generating source will be described in more detail with the specific modules. Particulate matter will be tracked by subtype which will include fugitive dust and equipment exhaust.

- Carbon Monoxide: The emissions from carbon monoxide (CO) will be calculated for all direct combustion sources associated with the project.
- Lead: The emissions from lead (Pb) will be calculated for all direct combustion sources associated with the project.
- Sulfur Dioxide: The emissions associated with sulfur dioxide (SO<sub>2</sub>) will be calculated for all direct combustion sources associated with the project.
- Nitrogen Oxides: The emissions associated with nitrogen oxides (NO<sub>x</sub>) will be calculated for all direct combustion sources associated with the project or direct emissions associated with area sources. Note that there may be some nitrous oxide (N<sub>2</sub>O) emissions that are calculated under the GHG module indirect sources that will not be incorporated into the nitrogen oxide emission tally for criteria pollutants since these emissions may be out of basin.
- Ozone: The ozone (O<sub>3</sub>) emissions are not calculated directly in this program. Instead the emissions associated with ozone precursors are calculated.
- Ozone Precursors: Ozone precursors will be quantified as reactive organic gases (ROG). ROGs when released will interact in the atmosphere and produce ozone.

By definition, a Volatile Organic Compound (VOC) is an organic compound that can evaporate into an organic gas. VOCs can be either reactive or non-reactive. Over the years, non-reactive VOCs have been exempt from regulation. CalEEMod calculates the VOC emissions from the application of architectural coatings based on the locally required VOC content limit of the coatings. ROG is an organic gas that undergoes a photochemical reaction, thus, is reactive. ROG emissions are generated from the exhaust of mobile sources and these combustion emissions are calculated in CalEEMod based on ARB's ROG emission factors. Both VOC and ROGs are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For the purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably.

### 2.3 Greenhouse Gas Pollutants

The greenhouse gas (GHG) pollutants are those recognized by the state of California under Assembly Bill 32 (AB32). The most common GHGs emitted in association with land use developments include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). All GHGs will be reported on a common currency of carbon dioxide equivalent (CO<sub>2</sub>e). In order to obtain the CO<sub>2</sub>e, an individual GHG is multiplied by its global warming potential (GWP). The GWP designates on a pound for pound basis the potency of the GHG compared to CO<sub>2</sub>. The program

will use GWP from the IPCC Second Assessment Report (SAR)<sup>3</sup>. GWPs from the SAR were selected instead of more recent GWPs since it is the basis used in regulations and international protocols at this time (e.g., California and Federal GHG Reporting Programs, The Climate Registry).

### 3 Land Use

The primary project description data that needs to be entered by the user is a listing of all land use types and size of the land use types that make up the project. CalEEMod contains several land use categories that are mainly based on ITE land use classifications. Some further division of some land uses (mainly warehouses) has been added. The land use subtype is the basis to define several default values used by the modules. The user-defined land use does not have any default information and the end user is required to enter all of the necessary information. The program currently places a value of 0 for all areas where user defined values would be required for a blank land use.

The land use size has several different size metrics that the end user can choose from. In order for the information to be cross-compatible, the user can enter all of the metrics for a given land use or default conversions between the metrics will be used. The cross-comparison data generally came from the following sources:

- The value for average dwelling unit square footage is rounded based on the average square footage reported in the Residential Appliance Saturation Survey (RASS). Retirement communities and congregate care facilities are assumed to be similar in size to multifamily units.
- The conversion value is based on taking the ratios of different metrics reported in the Institute of Transportation Engineers (ITE) trip rate manual.
- Equivalent commercial building metrics as noted in Table B1 of the Energy Information Administration (EIA) Commercial Building Energy Consumption Survey (CBECS).
- South Coast Air Basin land use statistics (see Appendix E for this reference data).

Unlike other programs, CalEEMod does not account for additional acreage associated with commercial buildings. This was deemed unnecessary since parking lots have been separated out as a separate land use and multi-story buildings should have their lot acreage known.

#### 3.1 Population

The population is used to estimate some metrics. The population per dwelling unit is based on the statewide default or information supplied by individual air districts.

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<sup>3</sup> IPCC. 1995. Second Assessment Report. Available at [http://www.ipcc.ch/ipccreports/sar/wg\\_1/ipcc\\_sar\\_wg\\_1\\_full\\_report.pdf](http://www.ipcc.ch/ipccreports/sar/wg_1/ipcc_sar_wg_1_full_report.pdf)

## 4 Construction

The construction module is used to calculate the emissions associated with the construction of the project. Construction emissions have several different types of sources which contribute to emissions of pollutants. These source types include off-road equipment usage, on-road vehicle travel, fugitive dust, architectural coating, and paving off-gassing. Each of these source types is discussed in more detail in the subsequent sections. These emission sources are associated with various types of construction phases. Typical construction phases include demolition, site preparation, grading, trenching, building construction, paving, and architectural coating. The extent to which these phases occur depends on the specific project. For instance, a demolition phase would only occur if demolition of existing structures was required. Similarly, trenching only occurs if the project requires trenching generally associated with underground utilities. Unique aspects and default assumptions associated with these phases is discussed below in the context of the different emission source calculations.

### 4.1 Construction Phase

No emission calculations are associated with this subscreen. The SCAQMD construction survey is used to estimate default phase lengths based on total project acreage as calculated from the acreage entered on the land use screen. If the acreage is in between the acreage in the survey, the next highest acreage tier is used. If the project size defined by the user is between the sizes of two surveyed projects, CalEEMod conservatively uses the phase duration for the larger project. For instance, if the given project is 7 acres, the program will use the phase duration for the 10-acre project rather than that for the 5-acre project. For large acreage sites, the survey was extrapolated by adding additional phase time equivalent to adding phase time from two acreage ranges in the survey. This occurs for sites with acreage larger than 34 acres. In these situations, the user should consider the accuracy of the equipment and phase duration estimations or using site-specific construction schedules and equipment lists.

The date range, work days per week and total days are dynamically linked to each other and will influence one another if the user changes these values.

### 4.2 Off-road Equipment

Construction consists of several types of off-road equipment. Since the majority of the off-road construction equipment used for construction projects are diesel fueled, CalEEMod assumes all of the equipment operates on diesel fuel. However, there are mitigation measures that can be implemented that will allow for use of alternative fueled equipment.

The SCAQMD construction survey is used to estimate default equipment lists based on total project acreage as calculated from the acreage entered on the land use screen. If the acreage is in between the acreage in the survey, the next highest acreage tier is used. For large acreage sites, the survey was extrapolated by adding additional phase time equivalent to adding phase time from two acreage ranges in the survey. This occurs for sites with acreage larger than 34 acres. In these situations, the user should consider the accuracy of the equipment and phase duration estimations or using site-specific construction schedules and equipment lists.

The calculations associated with this screen include the running exhaust emissions from off-road equipment. Since the equipment is assumed to be diesel, there are no starting or evaporative emissions associated with the equipment as these are *de minimis* for diesel-fueled equipment<sup>4</sup>. The software program calculates the exhaust emissions based on California Air Resources Board (ARB) OFFROAD2011 methodology using the equation presented below.<sup>5</sup>

$$\text{Emission}_{\text{DieselEx}} = \sum_i (\text{EF}_i \times \text{Pop}_i \times \text{AvgHp}_i \times \text{Load}_i \times \text{Activity}_i)$$

Where:

*EF* = Emission factor in grams per horsepower-hour (g/bhp-hr) as processed from OFFROAD2011

*Pop* = Population, or the number of pieces of equipment

*AvgHp* = Maximum rated average horsepower

*Load* = Load factor

*Activity* = Hours of operation

*i* = equipment type

The program allows the end user to enter the number of pieces of equipment, horsepower, load factor, and daily hours of operation for each selected equipment type. CalEEMod assigns default parameters for the construction equipment as explained below:

**Emission Factor**

OFFROAD2011 was run for statewide with averaging days of MON-SUN for 22 scenario years each. All scenarios were run for three seasons – Annual, Summer, and Winter. The exhaust emission factors for each equipment at each horsepower range were back calculated from total daily emissions reported in the model output files using the following formula:

$$\text{Emission Factor [g/hp-hr]} = \frac{\text{Total Daily Exhaust} \times 907,184.74}{\text{Activity} \times \text{AvgHP} \times \text{LF}}$$

Where:

- Total Daily Exhaust = Total pollutant emissions [tons/day]
- Activity = Total daily statewide usage of equipment [hours/day]
- AvgHP = Average HP of equipment within the horsepower range [HP]
- LF = Load Factor of equipment [unitless]
- 907,184.74 = Conversion factor tons to grams (2000 lbs/ton x 453.5924 g/lb)

<sup>4</sup> ARB. 2006. Program Structure of the OFFROAD2007. Dec. Available at [http://www.arb.ca.gov/msei/offroad/pubs/offroad\\_overview.pdf](http://www.arb.ca.gov/msei/offroad/pubs/offroad_overview.pdf)

<sup>5</sup> California Air Resource Board (ARB). 2006. Overview: OFFROAD Model Available at [http://www.arb.ca.gov/msei/offroad/pubs/offroad\\_overview.pdf](http://www.arb.ca.gov/msei/offroad/pubs/offroad_overview.pdf)

Total Daily Exhaust and Activity were obtained from OFFROAD2011 model output, while AvgHP and LF were obtained from input files to the model.

### ***AvgHP***

The default average equipment horsepower is from OFFROAD2011. OFFROAD2011 has an average horsepower for each engine tier which was used in developing the emission factor (from equip.csv). This is different than the default horsepower used for default data which is based on the average horsepower of the mode of populations for the various engine horsepower tiers in OFFROAD.

### ***Load***

The load factor is the ratio of the actual output to the maximum output of a piece of equipment. The program uses the OFFROAD2011 load factor as default. Based on OFFROAD2011, the load factor is equipment type-specific and does not vary with horsepower (hp) (e.g., the load factors of a 125-hp dozer and a 500-hp dozer are the same).

### ***Activity***

The default hours of operation are 8 hours a day and 5 days a week over the construction phase duration unless specified otherwise in the equipment list. The construction phase length is used from the construction phase screen.

### ***i (Equipment Type) and Pop***

The default equipment list and number of pieces of equipment for each equipment type is determined based on the size (i.e., acreage) of the construction project based on the construction activity survey performed by the SCAQMD (Appendix E). If the project size defined by the user is between the sizes of two surveyed projects, the program will use the equipment list and number for the larger project. All equipment in the construction category of OFFROAD2011 is included in CalEEMod.

## **Trenching Emissions**

There is no default equipment list associated with trenching emissions at this time. The user can enter site-specific equipment lists for these situations.

## **4.3 Dust From Material Movement**

Fugitive dust is generated by the various source activities occurring at a construction site. This dust contributes PM<sub>10</sub> and PM<sub>2.5</sub> emissions and for detailed emission breakdowns are distinguished from exhaust particulate matter emissions. The program calculates fugitive dust associated with the site preparation and grading phases from three major activities: haul road grading, earth bulldozing, and truck loading. As recommended by SCAQMD, the fugitive dust emissions from the grading phase are calculated using the methodology described in USEPA AP-42.

## Grading Equipment Passes

Fugitive dust emissions from grading equipment passes are estimated using the methodology described in Section 11.9, Western Surface Coal Mining, of the USEPA AP-42.<sup>6</sup> AP-42 estimates the emission factor of PM<sub>10</sub> applying a scaling factor to that of PM<sub>15</sub>. Similarly, the emission factor of PM<sub>2.5</sub> is scaled from that of total suspended particulates (TSP). The equations used to calculate the emission factors for PM<sub>15</sub> and TSP and the scaling factor for those of PM<sub>10</sub> and PM<sub>2.5</sub> are presented below:

$$EF_{PM15} = 0.051 \times (S)^{2.0}, \text{ and } EF_{PM10} = EF_{PM15} \times F_{PM10}$$

$$EF_{TSP} = 0.04 \times (S)^{2.5}, \text{ and } EF_{PM2.5} = EF_{TSP} \times F_{PM2.5}$$

Where:

$EF$  = emission factor (lb/VMT)

$S$  = mean vehicle speed (mph). The AP-42 default value is 7.1 mph.

$F_{PM2.5}$  = PM<sub>2.5</sub> scaling factor. The AP-42 default value is 0.031.

$F_{PM10}$  = PM<sub>10</sub> scaling factor. The AP-42 default value is 0.6.

The grading dust emissions are calculated by multiplying the emission factors with the total vehicle miles traveled (VMT) for the grading equipment (i.e., grader). The VMT are estimated based on the dimensions of the grading area and the blade width of the grading equipment.

$$E = EF \times VMT, \text{ and}$$

$$VMT = A_s / W_b \times 43,560(\text{sqft} / \text{acre}) / 5,280(\text{ft} / \text{mile})$$

Where:

$E$ : emissions (lb)

$EF$ : emission factor (lb/VMT)

$VMT$ : vehicle miles traveled (mile)

$A_s$ : the acreage of the grading site (acre)

$W_b$ : Blade width of the grading equipment. The program uses a default blade width of 12 ft based on Caterpillar's 140 Motor Grader.<sup>7</sup>

Note that the dimensions (i.e., length and width) of the grading site have no impact on the calculation, only the total area to be graded. In order to properly grade a piece of land multiple passes with equipment may be required. The acres is based on the equipment list and days in grading or site preparation phase according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday. The equipment specific grading rates are given in the table below as determined by SCAQMD in consultation with building estimator references.

<sup>6</sup> Available at: <http://www.epa.gov/ttn/chief/ap42/ch11/final/c11s09.pdf>

<sup>7</sup> <http://www.cat.com/cmms/16897760?x=7>

Equipment Type	Acres/8hr-day
Crawler Tractors	0.5
Graders	0.5
Rubber Tired Dozers	0.5
Scrapers	1

### Bulldozing

Similar to the grading equipment passes emission estimation, the bulldozing emission factors for PM<sub>10</sub> and PM<sub>2.5</sub> are scaled from those of PM<sub>15</sub> and TSP. Based on Section 11.9 of AP-42, the dust emission factor for bulldozing is calculated using the following equations:

$$EF_{TSP} = \frac{C_{TSP} \times s^{1.2}}{M^{1.3}}, \text{ and } EF_{PM2.5} = EF_{TSP} \times F_{PM2.5}$$

$$EF_{PM15} = \frac{C_{PM15} \times s^{1.5}}{M^{1.4}}, \text{ and } EF_{PM10} = EF_{PM15} \times F_{PM10}$$

Where:

- EF = emission factor (lb/hr)
- C = arbitrary coefficient used by AP-42
- M = material moisture content (%)
- S = material silt content (%)
- F = scaling factor

C, M, s, and F vary depending on the bulldozed material. The table below summarizes the constants for overburden<sup>8</sup> presented in AP-42<sup>9</sup>.

#### Bulldozing Fugitive Emission Factors

Constant	Overburden
C <sub>TSP</sub>	5.7
C <sub>PM15</sub>	1.0
M	7.9%
s	6.9%
F <sub>PM10</sub>	0.75
F <sub>PM2.5</sub>	0.105

<sup>8</sup> The earth that is between the topsoil and the coal seam (USEPA AP-42).

<sup>9</sup> Tables 11.9-1 and 11.9-3 of USEPA AP-42.

The program uses the constants associated with overburden as default for calculation of bulldozing dust emissions since overburden more closely models the bulldozed materials during the development construction. The dust emissions are calculated by multiplying the emission factor with the hours of operation for the dozers listed in the equipment list using the formula below:

$$E = EF \times Hr$$

Where:

$E$  = emissions (lb)  
 $EF$  = emission factor (lb/hr)  
 $Hr$  = hours of operation

### Truck Loading

Processes such as truck dumping on the pile or loading out from the pile to a truck with a front-end loader also cause fugitive dust emissions. The program calculates these emissions using the methodology described in Section 13.2, Introduction to Fugitive Dust Sources, of USEPA AP-42. The emission factor that is based on the material moisture content and mean wind speed is calculated using the following formula:

$$EF_D = k \times (0.0032) \times \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}}$$

Where:

$EF$  = emission factor (lb/ton)

$K$  = particle size multiplier. The AP-42 default value for  $PM_{10}$  is 0.35 and that for  $PM_{2.5}$  is 0.053

$U$  = mean wind speed. The program selects wind speed based on the value listed on the Project Characteristics screen. It has been converted internally to miles per hour.

$M$  = material moisture content (%). The moisture contents of different materials are listed in Table 13.2.4-1 of AP-42. The program uses the moisture content of cover (12%) as default.

The fugitive dust emissions are calculated by multiplying the emission factor with the throughput of loaded and unloaded material that is entered by the end user.

$$E = EF \times TP$$

Where:

$E$  = emissions (lb)

$EF$  = emission factor (lb/ton)

$TP$  = throughput of loaded and unloaded materials (ton)

CalEEMod assumes that 1.2641662 tons per cubic yard based on a bulk density of 1.5 grams per cubic centimeter. Typical soil densities range from about 1.25 to about 1.6. 1.5 is the approximate density of a silty loam soil which is relatively common in most other parts of the state. The density reported above does not account for watering to suppress dust, it only accounts for natural moisture. This is supported by the several references<sup>10</sup>.

#### 4.4 Demolition

The program calculates the demolition dust emissions using the methodology described in the report prepared for the USEPA by Midwest Research Institute (MRI).<sup>11</sup> The three primary operations that generate dust emission during the demolition phase are mechanical or explosive dismemberment, site removal of debris, and on-site truck traffic on paved and unpaved road. The truck traffic on roads is described with the trips and VMT information.

##### Mechanical or Explosive Dismemberment

Based on the MRI report, there is no AP-42 emission factor data available for this mechanical or explosive dismemberment. Thus, the emission factor for dismemberment and collapse of a structure is calculated using the following AP-42 equation for batch drop operations:

$$EF_D = k \times (0.0032) \times \frac{\left(\frac{U}{5}\right)^{1.3}}{\left(\frac{M}{2}\right)^{1.4}}$$

Where:

$EF_D$  = emission factor (lb PM/ton of debris)

$EF_{D-PM_{10}}$  = 0.0011 lb PM<sub>10</sub>/ton of debris

$EF_{D-PM_{2.5}}$  = 0.00017 lb PM<sub>2.5</sub>/ton of debris

$k$  = particle size multiplier. The AP-42 default value for PM<sub>10</sub> is 0.35 and that for PM<sub>2.5</sub> is 0.053.

<sup>10</sup> <http://www.pedosphere.com/resources/bulkdensity/triangle.cfm?>

Saxton et al., 1986 <http://ddr.nal.usda.gov/bitstream/10113/35/1/IND86070586.pdf>

<sup>11</sup> Midwest Research Institute. 1988. Gap Filling PM10 Emission Factors for Selected Open Area Dust Sources.

$U$  = mean wind speed. The program selects the default mean wind speed based on the wind speed (m/s) provided on the project characteristics screen.

$M$  = material moisture content. The program uses 2% as the default based on the MRI report.

The dust emissions are calculated by multiplying the above emission factors with the total weight of building waste using the following equation:

$$E_D = EF_D \times W$$

Where:

$E_D$  = emissions (lb of PM)

$EF_D$  = emission factor (lb of PM/ton of debris)

$W$  = building waste (ton of debris)

If the total building waste weight is not known, the program will estimate the tonnage using the *building waste tonnage – structural floor space* relationship determined from a 1976 analysis by Murphy and Chatterjee of the demolition of 12 commercial brick, concrete, and steel buildings. The following data are cited directly from the MRI report:

1 ft<sup>2</sup> floor space = 10 ft<sup>3</sup> original building volume,

1 ft<sup>3</sup> building volume = 0.25 ft<sup>3</sup> waste volume,

1 yd<sup>3</sup> building waste = 0.5 ton weight,

Mean truck capacity = 20 yd<sup>3</sup> haulage volume, and therefore

1 ft<sup>2</sup> represents 0.046 ton of waste material.

The total building waste is then calculated using the following equation:

$$E_D = EF_D \times SF \times 0.046(\text{ton} / \text{ft}^2)$$

Where:

$E_D$  = emissions (lb of PM)

$EF_D$  = emission factor (lb of PM/ton of debris)

$SF$  = building square footage (ft<sup>2</sup>)

### Debris Loading

The dust emission factor of PM<sub>10</sub> and PM<sub>2.5</sub> in pounds per ton building waste is estimated based on the measured total suspended particulates (TSP) emission factor using the following equation:

$$EF_L = k \times EF_{L-TSP}$$

Where:

$EF_L$  = emission factor (lb/ton)

$k$  = particle size multiplier. The AP-42 default value for PM<sub>10</sub> is 0.35 and that for PM<sub>2.5</sub> is 0.053.

The default value for  $EF_{L-TSP}$  is 0.058 lb/ton, the average of the two TSP factor (i.e. 0.053 and 0.063 lb/ton) measured from two tests of the filling of trucks with crushed limestone using a front-end loader.

The dust emissions from debris loading are then calculated following the same methodology used for mechanical and or explosive dismemberment:

$$E_L = EF_L \times SF \times 0.046(\text{ton} / \text{ft}^2)$$

Where:

- $E_L$  = emissions (lb)
- $EF_L$  = emission factor (lb/ton)
- $SF$  = building square footage ( $\text{ft}^2$ )

#### 4.5 Trips and VMT

The number of worker, vendor, and hauling trips and associated vehicle miles traveled (VMT) are used to determine both the exhaust emissions associated with on-road vehicle use and fugitive dust emissions.

##### Trips

Worker trips for all construction phases except building construction and architectural coating is based on 1.25 workers per equipment in that phase resulting in one roundtrip per worker. For building construction workers, the trip number is estimated using the trip generation rate from a survey conducted by SMAQMD. This has been reanalyzed and results in slightly different numbers than used by other programs and that was previously reported in some agency documents. The analysis and data supporting these values can be found in Appendix E. The land types selected for the project are grouped into four categories presented in the following table which also presents the associated SMAQMD trip generation rates.

**Building Construction Worker and Vendor Trip Rates**

Land Use SubType	Rate Metric	Worker Trip Rate	Vendor Trip Rate
Single Family	Daily Trips per DU	0.36	0.1069
Multi-Family	Daily Trips per DU	0.72	0.1069
Commercial/Retail	Daily Trips per 1000 sqft	0.32	0.1639
Office/Industrial	Daily Trips per 1000 sqft	0.42	0.1639
Source: SCAQMD's analysis of SMAQMD Building Construction Worker and Vendor trip rates found in Appendix E.			

Architectural coating worker trips are 20% of building construction phase trips. Vendor trips are only associated with building construction and is based on the land uses and trip rate indicated in the table above.

Haul trips are based on the amount of material that is demolished, imported or exported assuming a truck can handle 16 cubic yards of material. For phased trips, the truck is assumed

to be full both ways. For non-phased trips, the truck is assumed to be empty one direction and thus results in more haul trips calculated.

**VMT**

The VMT is estimated from the trip lengths input in this screen. The default trip length for workers is based on the location H-W trip length. The default trip length for vendors is the C-NW trip length. The hauling trip length default is set at 20 miles.

**On-Road Vehicle Emissions**

Construction generates on-road vehicle exhaust, evaporative, and dust emissions from personal vehicles for worker and vendor commuting, and trucks for soil and material hauling. These emissions are based on the number of trips and VMT along with emission factors from EMFAC2011.

EMFAC2011 was run in Burden mode with model year breakdown for all counties, air basins, air districts and statewide average with default settings for 22 scenario years each.<sup>12</sup> All scenarios were run for three seasons – Annual, Summer, and Winter.

Running emissions for all pollutants and PM emissions from tire and brake wear were divided by the VMT of each respective vehicle class from each scenario year and adjusted for unit conversions to derive emission factors in units of grams per VMT. All other emissions (including evaporative) were divided by the number of trips to derive emission factors in units of grams per trip.

For all CO<sub>2</sub> emissions (running, startup, and idling), emission reductions due to Pavley I were applied to LDA, LDT1, LDT2, and MDV for each vehicle model year, and summed to arrive at the total CO<sub>2</sub> emissions for each scenario year. Reductions from Low Carbon Fuel Standards and Pavley I are reflected in CO<sub>2</sub> emissions for scenario years 2011 and after. VMT fractions, calculated as the ratio of VMT for each vehicle class to total VMT for all vehicles were also derived for each scenario year. These values are based on ARB’s EMFAC post processor. The emissions from mobile sources were calculated with the trip rates, trip lengths and emission factors for running from EMFAC2011 as follows:

$$\text{Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$  = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$  = emission factor for running emissions

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<sup>12</sup> 1990, 2000, 2005, 2010 to 2025 inclusive, 2030, 2035, and 2040

Evaporative emissions, starting and idling emissions are multiplied by the number of trips times the respective emission factor for each pollutant.

**Brake Wear and Tire Wear Emissions**

As vehicles are driven, particulate matter is generated from degradation of brakes and tires. This is calculated based on the EMFAC emission factors for each vehicle class and the total VMT traveled by that vehicle class according to the following equation:

$$\text{Emission}_{\text{brakewear, tirewear}} = \sum_{\text{class}} (\text{E.F.}_{\text{brakewear, tirewear, class}} \times \text{VMT}_{\text{class}})$$

**Vehicle Mix**

The user can select the type of vehicle mix. The EMFAC mix is the total mix of all vehicles provided by EMFAC. The program can also assume that the workers’ personal vehicles consist of 50% light-duty auto (or passenger car), 25% light-duty truck type 1 (LDT1), and 25% light-duty truck type 2 (LDT2). The gross vehicle weight (GVW) from EMFAC2011 for each type of vehicle is presented below<sup>13</sup>:

Gross Vehicle Weights

Vehicle Type	GVW (lb)
LDA	All
LDT1	0 - 3,750
LDT2	3,751 - 5,750

For vendor trips, CalEEMod has the option to choose the EMFAC mix or also choose all HHDT or all MHDT vehicles. The program default assumes that all vendors’ vehicles are heavy heavy-duty trucks (HHDT) with GVW between 33,000 and 60,000 lb based on EMFAC2011.

For hauling trips, CalEEMod has the option to choose the EMFAC mix, all MHDT, all HHDT or a 50% mix of MHDT and HHDT vehicles.

**4.6 On-Road Fugitive Dust**

CalEEMod calculates all on-road fugitive dust associated with paved and unpaved roads consistent with the method discussed in the traffic section. All vehicle miles traveled from worker commuting, vendor commutes, soil hauling, and demolition hauling are accounted for. The same equations described in section 5.3 are used here with the variables coming from this screen.

<sup>13</sup> ARB. EMFAC2007 version 2.30 User’s Guide.

Available at: [http://www.arb.ca.gov/msei/onroad/downloads/docs/user\\_guide\\_emfac2007.pdf](http://www.arb.ca.gov/msei/onroad/downloads/docs/user_guide_emfac2007.pdf)

## 4.7 Architectural Coatings

Volatile organic compounds<sup>14</sup> (VOC) off-gassing emissions result from evaporation of solvents contained in surface coatings. The program calculates the VOC evaporative emissions from application of residential and non-residential surface coatings using the following equation:

$$E_{AC} = EF_{AC} \times F \cdot A_{\text{paint}}$$

Where:

$E$  = emissions (lb VOC)

$EF$  = emission factor (lb/sqft)

$A$  = building surface area (sqft). The program assumes the total surface for painting equals 2.7 times the floor square footage for residential and 2 times that for nonresidential square footage defined by the user.<sup>15</sup> All of the land use information provided by a metric other than square footage will be converted to square footage using the default conversions or user defined equivalence.

$F$  = fraction of surface area. The default values based on SCAQMD methods used in their coating rules are 75% for the interior surfaces and 25% for the exterior shell.

The emission factor (EF) is based on the VOC content of the surface coatings and is calculated estimated using the equation below:

$$EF_{AC} = C_{VOC} / 454(\text{g/lb}) \times 3.785(\text{L/Gal}) / 180(\text{sqft})$$

Where:

$EF$  = emission factor (lb/sqft)

$C$  = VOC content (g/L). This varies by location and year

The emission factors for coating categories are calculated using the equation above based on default VOC content provided by the air districts or ARB's statewide limits<sup>16</sup>.

CalEEMod also calculates the VOC emissions from the painting of stripes, handicap symbols, directional arrows and car space descriptions in parking lots. Please refer to Appendix E for the studies conducted to determine a default percent of parking lot square footage that is painted.

The equation for striping emission is the same as that for  $E_{AC}$  above, but  $A_{\text{paint}}$  is:

$$A_{\text{paint}} = A_{\text{PL}} \times P\%$$

<sup>14</sup> This program will assume that all VOCs are represented by reactive organic gases (ROGs)

<sup>15</sup> The factors 2.7 and 2 are based on page A9-124 of SCAQMD's 1993 CEQA Guide.

<sup>16</sup> Received via email from James Koizumi dated April 27, 2010.

Where:

$A_{PL}$  = Parking lot area (sqft)

$P\%$  = Default percent of parking lot area that is painted

The VOC content limit is based on the exterior coating of the region where the project is located. If the user has more specific VOC content limit on the coating being applied the default can be overridden but the user is expected to explain and justify the change in the “Remarks” box at the bottom of the screen.

#### 4.8 Asphalt Paving Off-Gassing Emissions

While there is no specific screen associated with asphalt paving emissions, CalEEMod estimates VOC off-gassing emissions associated with asphalt paving of parking lots using the following equation:

$$E_{AP} = EF_{AP} \times A_{Parking}$$

Where:

$E$  = emissions (lb)

$EF$  = emission factor (lb/acre). The SMAQMD default emission factor is 2.62 lb/acre.<sup>17</sup>

$A$  = area of the parking lot (acre)

The size (acre) of the parking lot is calculated by multiplying the paved area associated with each parking stall with the capacity of the parking lot, or the number of parking stalls.

$$A_{Parking\_lot} = A_{Parking\_Stall} \times Capacity$$

Where the paved area associated with parking stall includes the area of the parking stall and that of the immediate access road, or aisle.

$$A_{Parking\_Stall} = W_{Stall} \times D_{Stall} + W_{Stall} \times W_{Aisle}$$

Where:

$A$  = area (sqft)

$W$  = width (ft)

$D$  = depth (ft)

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<sup>17</sup> Sacramento Metropolitan Air Quality Management District. 1994. Air quality thresholds of significance, first edition. Sacramento, CA.

The dimensions (i.e., width and depth) of a parking stall and the aisle width vary depending on the local government planning guidance. The program conservatively assumes 400 square feet (0.009 acre) of paved area per parking stall as default based on the city guidance or municipal code of the following cities in the State of California and a one-way aisle:

Table 4.4 Parking Stall Size Estimate

Location	Dimensions									
	Compact					Full Size				
	Width (ft)	Depth (ft)	Aisle Width (ft)	Area (two-way) (sqft)	Area (one-way) (sqft)	Width	Depth	Aisle	Area (two-way) (sqft)	Area (one-way) (sqft)
City of San Jose <sup>18</sup>	8	16	20	208	288	9	18	26	279	396
Menlo Park <sup>19</sup>	8	16.5	23	224	316	9	18	23	265.5	369
Escondido Municipal Code <sup>20</sup>	8.5	16	24	238	340	8.5	18	24	255	357
Davis <sup>21</sup>	8	16	20	208	288	9	18	20	252	342

The program allows the end user to override the total acres assumed in the land use screen.

#### 4.9 Maximum Daily Construction Emissions

Since construction phases may or may not overlap in time, the maximum daily construction emissions will not necessarily be the sum of all possible daily emissions. CalEEMod therefore calculates the maximum daily emissions for each construction phase. The program will then add together the maximum daily emissions for each construction phase that overlaps in time. Finally the program will report the highest of these combined overlapping phases as a daily maximum. For fugitive dust calculations during grading, the maximum amount of acres graded in a day is determined by the number of grading equipment which is assumed to operate for 8 hours.

<sup>18</sup> Available at: [http://www.sanjoseca.gov/planning/pdf/Off-Street\\_Parking\\_Design\\_Standards.pdf](http://www.sanjoseca.gov/planning/pdf/Off-Street_Parking_Design_Standards.pdf)

<sup>19</sup> Available at: [http://www.ci.menlo-park.ca.us/departments/trn/park\\_guide.pdf](http://www.ci.menlo-park.ca.us/departments/trn/park_guide.pdf)

<sup>20</sup> Available at: [http://www.qcode.us/codes/escondido/view.php?topic=33-39-33\\_768&frames=on](http://www.qcode.us/codes/escondido/view.php?topic=33-39-33_768&frames=on)

<sup>21</sup> Available at: <http://cityofdavis.org/cmo/citycode/detail.cfm?p=40&q=1890>

## 5 Operational Mobile

CalEEMod calculates the emissions associated with on-road mobile sources. These are associated with residents, workers, customers, and delivery vehicles visiting the land use types in the project. The emissions associated with on-road mobile sources includes running and starting exhaust emissions, evaporative emissions, brake and tire wear, and fugitive dust from paved and unpaved roads. Starting and evaporative emissions are associated with the number of starts or time between vehicle uses and the assumptions used in determining these values are described below. All of the other emissions are dependent on vehicle miles traveled (VMT). The methods and assumptions used by the program are described in the following sections.

### 5.1 Vehicle Trips

The first step in determining the number of starts and vehicle miles traveled is to determine the number of trips associated with the various project land uses. These trips are calculated based on either an average daily or a peak daily. The average daily is used when calculating annual emissions from a project, and peak daily is used when calculating peak daily summer or winter emissions. Since CalEEMod has different trip rates for different days of the week, the daily maximum will be determined based on the highest total of either weekday, Saturday, or Sunday trip emissions. To calculate average daily trips, the weekday trips are multiplied by five and added to the Saturday and Sunday trips, then divided by 7. The average daily trip rates for the individual land uses being modeled are used by CalEEMod in the calculation of a project's annual vehicle miles traveled and as just described are determined from the following equation:

Average Daily Trip Rate  $_i =$

$$(Triprate_{Weekday} \times 5 + Triprate_{Sat} + Triprate_{Sun})_i / 7 \times LandUse_i$$

Where

Trip Rate = Weekday, Saturday, or Sunday daily trip generation rate

Land Use = Size metric for a land use type (e.g., number of dwelling units)

$i$  = Land use type

For peak daily trips, CalEEMod chooses the highest trip rate amongst weekday, Saturday and Sunday data, and multiplies by the size metric to get total peak daily trips.

Trip rate describes the amount of trips generated by each land use. Multiplying trip rate per unit size of land use (e.g., per dwelling unit, per 1,000 sqft, etc.) by land use size yields total daily trips generated by each land use. The Institute of Transportation Engineers (ITE) trip

generation rate<sup>22</sup> are used as default in the program except for an interim warehouse trip rate which is based on an analysis by SCAQMD staff presented in Appendix E. Like all standard references, it should be noted that ITE has guidance about how their trip rates should be used. For example, some land uses (e.g., electronic superstore, fast food without drive-thru, general heavy industrial, government (civic center), hardware/paint store, movie theater without a matinee) are based on a limited number of survey samples so the user might consider gaining more refined trip rate information for their project. If the user needs more specific information than the default trip rates provided by CalEEMod, they are encouraged to consult with licensed traffic engineers. If more accurate trip rate information is available, the user has the ability to override the default Trip Rate. The end user will be required to provide justification from alternative sources of data (e.g., project-specific traffic study) that demonstrate that a different trip rate is appropriate for their project. Metropolitan Planning Organizations (MPOs) may be another source of trip generation rates specific for the given region.

### Trip Type

Once the total number of trips for a land use type is determined, the next step is to determine the trip type. The trip type breakdown describes the purpose of the trip generated at each land use. For example, the trip type breakdown indicates the percentage of trips generated at single family home for work, for shopping, and for other purposes. Multiplying the total trips for a land use by trip type breakdown percentage yields trips of a given trip type. Two sets of trip type breakdown are used in CalEEMod— residential breakdown and commercial breakdown.

**Residential trip type:** These include home-work (H-W), home-shop (H-S), or home-other (H-O). A home-work trip represents the trip from the home to the workplace. A home-shop trip represents the trip from the home to a land use where shopping takes place (generally retail). A home-other represents all other types of trips generated from the resident such as school, entertainment, etc. The trip type breakdown is from district supplied information or the 1999 Caltrans Statewide Travel Survey is used as default or specific information obtained from the various Districts. It is recommended that the District or Project Applicant go to accredited sources such as the regional Metropolitan Planning Organization (MPO) to obtain trip type breakdown specific for the given region. The trip type breakdown can be overwritten if users can provide sufficient justification for alternative sources of data (e.g., project-specific traffic study) that demonstrate a different breakdown.

**Commercial trip type:** These include commercial-customer (C-C), commercial-work (C-W) and commercial-nonwork (C-NW). A commercial-customer trip represents a trip made by someone who is visiting the commercial land use to partake in the services offered by the site. The commercial-work trip represents a trip made by someone who is employed by the commercial land use sector. The commercial-nonwork trip represents a trip associated with the commercial land use other than by customers or workers. An example of C-NW trips includes trips made by delivery vehicles of goods associated with the land use. The trip type breakdown from the

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<sup>22</sup> ITE. 2008. Trip Generation 8<sup>th</sup> Edition. In September 2012, ITE published the 9<sup>th</sup> edition that updated some of the trip rates from the 8<sup>th</sup> edition. The updates are not yet incorporated into CalEEMod but the user has the ability to override the trip rate default.

number of workers and or truck trips from ITE and an analysis of information provided for the SCAB was used as default to assign the trip type breakdowns for all land uses. If an exact match to a land use was not available, data from a similar land use was used as a surrogate. Trip type breakdown can be overwritten if users can provide justification for alternative sources of data (e.g., project-specific traffic study) that demonstrates different breakdown.

### Primary Trip Lengths

Each trip type has a primary trip length associated with it. These trip lengths are based on the location and urbanization selected on the project characteristic screen. These values were supplied by the districts or use a default average for the state. Each district (or county) also assigns trip lengths for urban and rural settings. For residential projects, average primary trip lengths of all trip types are determined with the below equation. Commercial and industrial land use types use a similar equation based on their trip types.

Average Primary Trip Length  $i$  =

$$H - W_{miles} \times H - W_{trip\%} + H - S_{miles} \times H - S_{trip\%} + H - O_{miles} \times H - O_{trip\%}$$

Where

$H - W_{miles}$	= Home to Work trip length
$H - W_{trip\%}$	= % of the total primary trips that are Home to Work trips
$H - S_{miles}$	= Home to Shopping trip length
$H - S_{trip\%}$	= % of the total primary trips that are Home to Shopping trips
$H - O_{miles}$	= Home to Other trip length
$H - O_{trip\%}$	= % of the total primary trips that are Home to Other trips
$i$	= land use type.

### Primary, Pass-by and Diverted Trip Links

Trip link types further describe the characteristics of the trip attracted to each land use, whether it's a primary trip, a diverted link trip, or a pass-by trip. For example, a commercial customer pass-by trip could be a person going from home to shop on his/her way to work. In addition, a commercial customer diverted-link trip could be a person going from home to work, and on its way making a diversion to shop. Pass-by trips generate virtually no additional running emissions but could generate additional resting and startup emissions. Diverted trips generate less running emissions compared to primary trips, and can also generate additional resting and startup emissions. The average VMT associated with a trip is adjusted by modifying the primary

trip length to account for reductions from pass-by and diverted trips. The trip lengths mentioned above are for primary trip links. For pass-by trip links the trip length will be 0.1 miles and diverted trip links the trip length will be 25% of the primary trip length.

An average overall trip length can be calculated as follows:

$$\text{Average Overall Trip Length}_i = \text{Link\%}_{\text{primary}} \times \text{TripLength}_{\text{Avg Primary}} + \text{Link\%}_{\text{diverted}} \times 0.25 \times \text{TripLength}_{\text{Avg Primary}} + \text{Link\%}_{\text{passby}} \times 0.1 \text{ mile}$$

Where

Link % = percentage of link types

Trip Length<sub>AvgPrimary</sub> = Average primary trip length for each trip type

i = land use type

The trip link percentage from the ITE Generation book and SANDAG are used as default. The trip link percentage can be overwritten if users can provide justification for alternative sources of data (e.g., project-specific traffic study) that demonstrate different breakdown. If diverted or pass-by trips are not desired, the end user can change the default percentages to zero for these and have primary equal 100%.

### Vehicle Miles Traveled

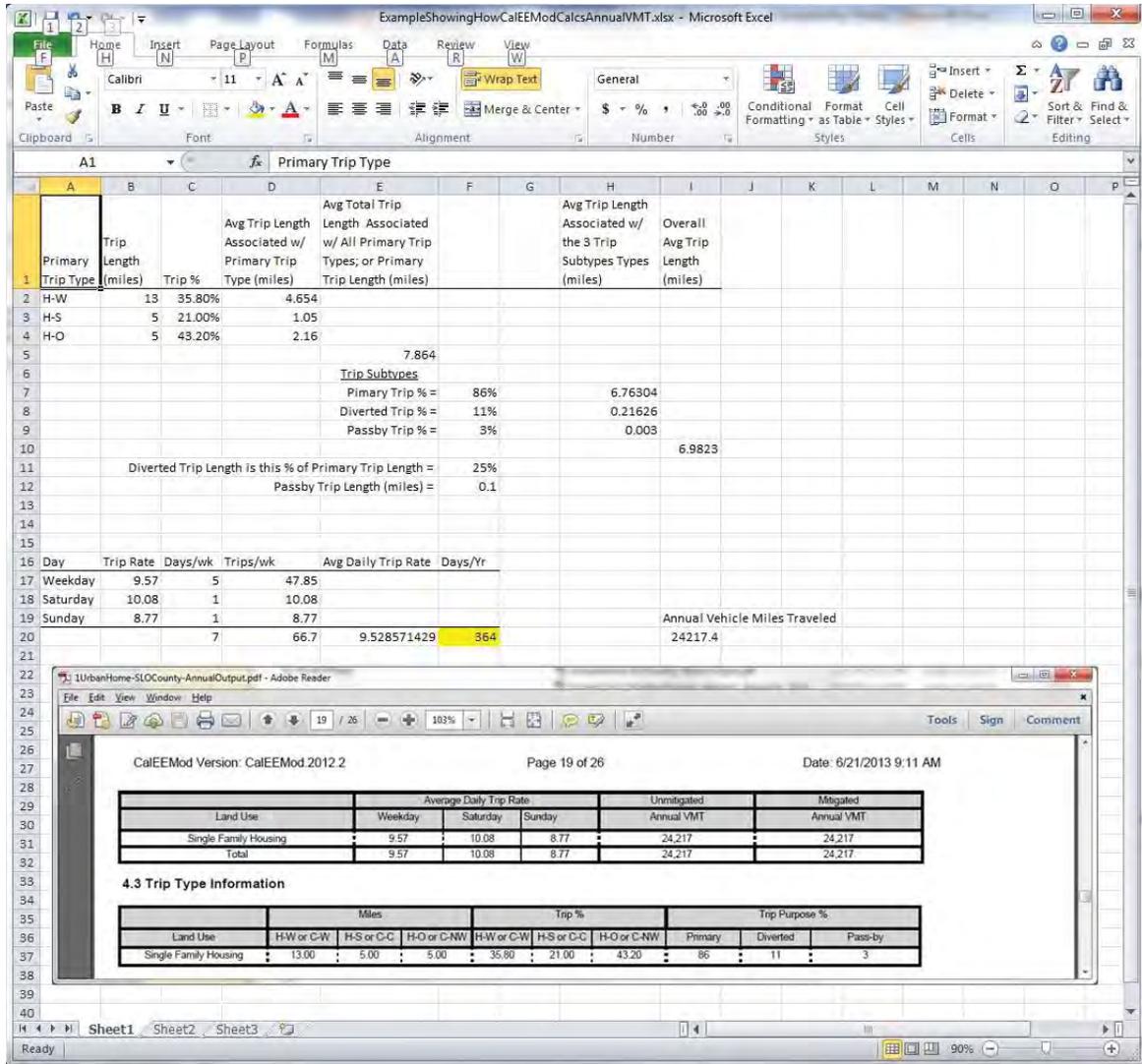
The daily vehicle miles traveled (VMT<sub>d</sub>) for a modeled project is calculated with the below equation using average daily trip rates and lengths calculated from equations above. CalEEMod calculates Annual VMT by multiplying VMT<sub>d</sub> by 365 days/year.

$$\text{VMT}_d = \sum (\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.

The following screen shot shows an example of how CalEEMod calculated the Annual VMT for a single residential dwelling in an urban setting.



## 5.2 Vehicle Emissions

The emissions from mobile sources were calculated with the trip rates, trip lengths and emission factors for running from EMFAC2011 as follows:

$$\text{Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$  = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$  = emission factor for running emissions

In order to obtain the emission factor for running emissions, EMFAC2011 was run in Burden mode with model year breakdown for all counties, air basins, air districts and statewide average

with default settings for 22 scenario years each.<sup>23</sup> All scenarios were run for three seasons – Annual, Summer, and Winter. Running emissions for all pollutants and PM emissions from tire and brake wear were divided by the VMT of each respective vehicle class from each scenario year and adjusted for unit conversion to derive emission factors in units of grams per VMT. For all CO<sub>2</sub> emissions (running, startup, and idling), emission reductions due to Pavley I were applied to LDA, LDT1, LDT2, and MDV for each vehicle model year, and summed to arrive at the total CO<sub>2</sub> emissions for each scenario year. Reductions from Low Carbon Fuel Standards and Pavley I are reflected in CO<sub>2</sub> emissions for scenario years 2011 and after. VMT fractions, calculated as the ratio of VMT for each vehicle class to total VMT for all vehicles were also derived for each scenario year.

Similarly, evaporative, starting, and idling emissions were divided by the number of trips to derive emission factors in units of grams per trip. Evaporative emissions, starting and idling emissions are multiplied by the number of trips times the respective emission factor for each pollutant.

**Brake Wear and Tire Wear Emissions**

As vehicles are driven, particulate matter is generated from degradation of brakes and tires. This is calculated based on the EMFAC emission factors for each vehicle class and the total VMT traveled by that vehicle class according to the following equation:

$$\text{Emission}_{\text{brakewear, tirewear}} = \sum_{\text{class}} (\text{E.F.}_{\text{brakewear, tirewear, class}} \times \text{VMT}_{\text{class}})$$

**5.3 Road Dust**

Vehicles that drive on both paved and unpaved roads generate fugitive dust by dispersing the silt from the roads. The following equation is used to calculate the fugitive dust emissions associated with paved roads:

$$E_{ext} = [ k (sL)^{0.91} \times (W)^{1.02} ] (1 - P/4N)$$

Where:

- E<sub>ext</sub> = annual or other long-term average emission factor in the same units as k,
- k = particle size multiplier for particle size range and units of interest (see below),
- sL = road surface silt loading (grams per square meter) (g/m<sup>2</sup>),
- W = average weight (tons) of *all the vehicles* traveling the road (2.4 tons)

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<sup>23</sup> 1990, 2000, 2005, 2010 to 2025 inclusive, 2030, 2035, and 2040

$P$  = number of “wet” days with at least 0.254 mm (0.01 in) of precipitation during the averaging period, and

$N$  = number of days in the averaging period (e.g., 365 for annual, 91 for seasonal, 30 for monthly).

The above is the average emission factor by land use for paved roads. The default values for the required parameters are based on recommendations in AP-42. For daily emissions it is assumed to have no precipitation.

The following equation is used to calculate the fugitive dust emissions associated with unpaved roads:

$$E.F._{dust,i} = \left( \frac{k(s/12)^1(S/30)^{0.5}}{(M/0.5)^{0.2}} - C \right) \left( 1 - \frac{P}{365} \right)$$

Where:

$k$  = particle size multiplier for particle size range and units of interest (see below)

$s$  = surface material silt content (%)

$M$  = surface material moisture content (%)

$S$  = mean vehicle speed (mph)

$C$  = emission factor for 1980's vehicle fleet exhaust, brake wear and tire wear, and

$P$  = number of days in a year with at least 0.254 mm (0.01 in) of precipitation

The above is the average emission factor by land use for unpaved roads. For daily emissions it is assumed to have no precipitation.

By default, CalEEMod assumes the percentage of paved and unpaved roads for each district as provided by the district. The end user is allowed to modify the percentage of unpaved roads if specific information is available.

Once emission factors are determined, dust emissions can be calculated by

$$\text{Emissions}_{dust} = \sum_i (E.F._{dust,i} \times \text{VMT})$$

The VMT is the same used in vehicle trips.

### 5.4 Operational Off-Road Equipment

CalEEMod also calculates emissions from off-road equipment (e.g., forklifts, cranes, loaders, generator sets, etc.) used during the operation of the land use being analyzed. This is an optional calculation so the user would need to provide the type and number of off-road equipment being used during operation. From that information, CalEEMod provides horsepower, load factor, hours of operation and fuel type. The user has the ability to override the defaults. The emission factors are from OFFROAD2011. Please refer to section 4.2 for the equations in calculating emissions from off-road equipment.

## 6 Area Sources

The area source module is used to calculate direct sources of air emissions located at the project site. This includes hearths, consumer product use, architectural coatings, and landscape maintenance equipment. This does not include the emissions associated with natural gas usage in space heating, water heating, and stoves as these are calculated in the building energy use module.

### 6.1 Hearths

GHG emissions from the combustion of wood or biomass are calculated and are considered biogenic emissions of CO<sub>2</sub>. Some protocols do not consider these emissions to be a part of the emission inventory. Therefore, these CO<sub>2</sub> emissions will be kept distinct from the anthropogenic GHG emissions. The method to calculate the criteria and biogenic GHG emissions associated with wood stoves is shown. Emissions from wood stoves are calculated using the formula below for each wood stove type:

$$\text{Wood hearth emissions (MT/year)} = \frac{\text{Emission Rate (g CO}_2\text{ per kg wood burned)}}{\text{Wood Burned (tons per year)}} \times 907,185 \frac{\text{g}}{\text{ton}} \times \text{number of stoves} \times \frac{1 \text{ MT CO}_2}{1 \times 10^6 \text{ g CO}_2}$$

where:

Emission Rate = Based on AP-42<sup>24</sup>.

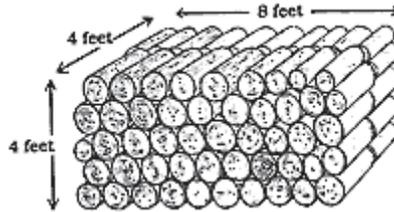
Wood Burned = Weight of wood burned per year per residential unit.

Number of stoves = Number of this type of stove in the project.

Using the formula above and the number of residential units with wood stoves, it is possible to estimate the GHG emissions from wood stoves. Default values for the emission factors and the amount of wood burned by different hearth types and the percentage of different hearths in various areas of California are based on ARB, USEPA, and district supplied emission factor values for hearths and woodstoves. The number of wood stoves or hearths is based on percentages supplied by districts or state defaults. If applicable, CalEEMod incorporates the restrictions on the number of wood burning fireplaces and stoves from SJVUAPCD Rule 4901

<sup>24</sup> US EPA AP-42, Chapter 1.9 (<http://www.epa.gov/ttnchie1/ap42/ch01/bgddocs/b01s09.pdf>) and Chapter 1.10 (<http://www.epa.gov/ttnchie1/ap42/ch01/bgddocs/b01s10.pdf>)

Amended 10/16/2008. For projects in the San Luis Obispo region, the wood burned per year is 2,016.5 lbs/year (3,081 lbs/cord X 0.6545 cords/year). For visual clarification, a standard cord of wood is defined as a stack of wood with a volume of 128 cubic feet (4 ft. x 4 ft. x 8 ft.)



Criteria pollutant emissions from wood stoves or hearths are computed by CalEEMod in a similar manner with emission factors also coming from AP-42<sup>25</sup>.

#### 6.1.1.1 Natural Gas Fireplaces/Stoves

GHG emissions associated with natural gas fired fireplaces are calculated using emission factors from the California Climate Action Registry (CCAR). The criteria pollutant emission factors are based on AP-42. The average heating rate in British Thermal Units (BTU) per hour for fireplaces in homes is 60,000 BTU/hr<sup>26</sup>. Default values for annual fireplace usage needs to be determined for each county. Natural gas is assumed to have 1,020 BTU per standard cubic foot<sup>27</sup>. Criteria pollutant emissions from natural gas fireplaces/stoves are computed by CalEEMod in a similar manner with emission factors also coming from AP-42<sup>27</sup>.

## 6.2 Consumer Products

Consumer products are chemically formulated products used by household and institutional consumers, including, but not limited to, detergents; cleaning compounds; polishes; floor finishes; cosmetics; personal care products; home, lawn, and garden products; disinfectants; sanitizers; aerosol paints; and automotive specialty products; but does not include other paint products, furniture coatings, or architectural coatings. SCAQMD did an evaluation of consumer product use compared to the total square footage of buildings using data from ARB consumer product Emission Inventory. This analysis can be found in Appendix E. To calculate the ROG emissions from consumer product use, the following equation is used:

$$\text{Emissions} = \text{EF} \cdot \text{BuildingArea}$$

Where:

$$\text{EF} = \text{pounds of VOC per building square foot per day}$$

<sup>25</sup> US EPA AP-42, Chapter 1.9. Page 3, Table 1.9-1 (<http://www.epa.gov/ttnchie1/ap42/ch01/bgdocs/b01s09.pdf>) and Chapter 1.10 (<http://www.epa.gov/ttnchie1/ap42/ch01/bgdocs/b01s10.pdf>)

<sup>26</sup> SCAQMD Rule 445 Staff Report - <http://www.aqmd.gov/hb/2008/March/080337a.html> and SCAQMD Final EA - <http://www.aqmd.gov/ceqa/documents/2008/aqmd/finalEA/FEA445.pdf>.

<sup>27</sup> USEPA. 1998. AP-42 Emission Factors. Chapter 1.4 Natural Gas Combustion, Pages 5-6, Tables 1.4-1 and 1.4-2, <http://www.epa.gov/ttnchie1/ap42/ch01/final/c01s04.pdf>.

The factor is  $2.14 \times 10^{-5}$  lbs/sqft/day for everyplace except SCAQMD

The factor is  $2.04 \times 10^{-5}$  lbs/sqft/day for SCAQMD areas.

Building Area = The total square footage of all buildings including residential square footage.

### 6.3 Architectural Coatings

VOC off-gassing emissions result from evaporation of solvents contained in surface coatings such as in paints and primers. The program calculates the VOC evaporative emissions from application of residential and non-residential surface coatings using the following equation:

$$E_{AC} = EF_{AC} \times F \cdot A_{\text{paint}} \times \text{Reapplication}$$

Where:

$E$  = emissions (lb)

$EF$  = emission factor (lb/sqft)

$F$  = fraction of surface area. The default values based on SCAQMD are 25% for the exterior surface and 75% for the interior.

$A$  = building surface area (sqft). The program assumes the total surface area for painting equals 2.7 times the floor square footage for residential land use and 2 times the floor square footage for nonresidential land use.<sup>28</sup> All land use information provided by a metric other than square footage will be converted to square footage using the default conversions or user-defined equivalence.

Reapplication = Rate at which surfaces are repainted.

The emission factor is based on the VOC content of the surface coatings and is calculated estimated using the equation below:

$$EF_{AC} = C_{VOC} / 454(\text{g/lb}) \times 3.785(\text{L/Gal}) / 180(\text{sqft})$$

Where:

$EF$  = emission factor (lb/sqft)

$C$  = VOC content (g/L). This is anticipated to vary by district and year.

#### Reapplication rate

All land use buildings are assumed to be repainted at a rate of 10% of area per year. This is based on the assumptions used by SCAQMD.

### 6.4 Landscape Equipment

Landscape maintenance includes fuel combustion emissions from equipment such as lawn mowers, roto tillers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers, as

<sup>28</sup> The factors 2.7 and 2 are based on page A9-124 of SCAQMD's 1993 CEQA Guide.

well as air compressors, generators, and pumps. The emissions associated from landscape equipment use were processed using OFFROAD 2011 and ARB's Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003<sup>29</sup>). The information was used along with the total building square footage and dwelling units in California to determine two emission factors. The first is for the commercial landscape equipment which is in terms of grams per square foot of non-residential building space per day. The second is the for the residential landscape equipment which is in terms of grams per dwelling unit per day. These emission factors are multiplied by the number of summer days or winter days that represent the number of operational days. For example, pieces of equipment that would typically be used in snow conditions were used with winter days this includes equipment such as snow blowers while all others were used with summer days. For those regions with 365 or 330 summer days (South Coast, Sacramento, San Joaquin Valley), it is assumed non-residential (e.g., commercial land uses) landscaping equipment would likely only operate during the week (not weekends) so operational days are 250 days per year.

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<sup>29</sup> [http://www.arb.ca.gov/msei/offroad/techmemo/Lawn\\_and\\_Garden\\_Activity.doc](http://www.arb.ca.gov/msei/offroad/techmemo/Lawn_and_Garden_Activity.doc)

## 7 Energy Use

GHGs are emitted as a result of activities in buildings for which electricity and natural gas are used as energy sources. Combustion of any type of fuel emits criteria pollutants and GHGs directly into the atmosphere; when this occurs in a building this is a direct emission source<sup>30</sup> associated with that building and the program will include all of the criteria and GHG pollutants. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a non-residential building, the electricity generation typically takes place offsite at the power plant; electricity use in a non-residential building generally causes emissions in an indirect manner and therefore only GHG emissions will be calculated from electricity generation.

Fuel oil, kerosene, liquefied petroleum gas, and wood can also be used as fuels, but generally contribute only in small amounts as combustion sources within buildings. As such, these minor emissions are not accounted for in the program.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building such as in plug-in appliances. In California, Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting.<sup>31</sup> Non-building energy use, or “plug-in” energy use can be further subdivided by specific end-use (refrigeration, cooking, office equipment, etc.). The program will calculate the non-residential energy use by:

1. Calculating energy use from systems covered by Title 24 (HVAC system, water heating system, and the lighting system).
2. Calculating energy use from lighting.
3. Calculating energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

The program will convert the resulting energy use quantities to GHG emissions by multiplying by the appropriate emission factors obtained by incorporating information on local electricity production. The following sections describe the methodologies employed to estimate GHG emissions.

### Estimate of Non-residential Energy Use Intensity

The program uses the California Commercial End Use Survey (CEUS)<sup>32</sup> database to develop energy intensity values (electricity or natural gas usage per square feet per year) for non-residential buildings. The methods used to estimate energy use are described below.

<sup>30</sup> California Climate Action Registry (CCAR) General Reporting Protocol (GRP), Version 3.1 (January). Available at: [http://www.climateregistry.org/resources/docs/protocols/grp/GRP\\_3.1\\_January2009.pdf](http://www.climateregistry.org/resources/docs/protocols/grp/GRP_3.1_January2009.pdf) Chapter 8

<sup>31</sup> Title 24, Part 6, of the California Code of Regulations: California's Energy Efficiency Standards for Residential and Nonresidential Buildings. <http://www.energy.ca.gov/title24/>

<sup>32</sup> California Energy Commission (CEC). California Commercial End-Use Survey Results. Data available from Itron Inc. at <http://capabilities.itron.com/CeusWeb/Chart.aspx>

### 7.1.1.1 CEUS Database

The CEUS data from the CEC<sup>33</sup> lists energy use intensity by CEUS building type, CEUS end-use, and CEC forecasting climate zone<sup>34</sup>. Each default land use in the program is mapped to an appropriate CEUS building type. The list of end uses from CEUS was grouped to some general end-use categories and distinguishes if the end use is related to Title-24 building systems.

Since 1978, the CEC has established building energy efficiency standards to conserve electricity and natural gas and prevent the state from having to build more power plants. The standards are updated periodically. As noted in User's Guide, the 2005 standards were used in CARB's Scoping Plan and are based on average savings for improvements from 2002 to 2005 ("Impact Analysis for 2005 Energy Efficiency Standards"). More recently, the 2008 standards<sup>35</sup> are based on improvements from 2005 to 2008 ("Impact Analysis 2008 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings"). The energy efficiency standards (part 6) are currently being considered in 2013 but not yet approved<sup>36</sup>. Thus, the 2013 standards are yet to be included in CalEEMod. Because the CEUS data uses 2002 survey data, the tool adjusts CEUS baseline Title 24 usage rates to reflect the 2008 Title 24 improvements. The default energy intensities reported are adjusted to 2008 Title 24 part 6. Adjustments for 2005 Title 24 part 6 are available by checking the "using historical data" box to incorporate Title 24 2005 in calculations. The 2005 Title 24 standard (part 6) were in effect when CARB developed its Scoping Plan 2020 No Action Taken predictions. Once the box is clicked, hit the "Default" button to download the historical (2005) data. Appendix E describes in detail the method used to analyze the CEUS data.

### 7.1.1.2 Residential Energy Use

The energy use from residential land uses is calculated based on the Residential Appliance Saturation Survey (RASS). Similar to CEUS, this is a comprehensive energy use assessment that includes the end use for various climate zones in California. Detailed discussions of processing the RASS data to obtain the lookup tables is described in Appendix E.

### 7.1.1.3 Other Land Use Energy Use

There are a few remaining land use categories that have not been included in the CEUS or RASS data. These include golf courses, parks, and recreational pools. These do not currently have default energy use values listed in the program. However, there have been published studies regarding the energy use from lighting, ventilation and elevators in parking lots and structures. From the parking lot land use category, the user has the option to choose parking lot, unenclosed parking structure, unenclosed parking structure with elevators, enclosed parking structure, or enclosed parking structure with elevators. CalEEMod calculates the energy use from lighting in open parking lots and unenclosed (no walls) parking structures; lighting and

<sup>33</sup> Workbooks downloaded from <http://capabilities.itron.com/CeusWeb/Chart.aspx> for all building categories

<sup>34</sup> A few climate zones were not included in the CEUS study. These climate zones will be mapped to another related climate zone that was included in the study.

<sup>35</sup> <http://www.energy.ca.gov/2008publications/CEC-400-2008-001/CEC-400-2008-001-CMF.PDF>

<sup>36</sup> <http://www.energy.ca.gov/title24/2013standards/index.html>

ventilation in enclosed parking structures; and elevators in those parking structures with them. With the energy use (kWh) amount, CalEEMod is able to calculate the corresponding criteria and GHG emissions. Refer to Appendix E for the details on the assessment of the various studies conducted on energy use rates and energy consumption from operation of car parking facilities in California. In addition, Appendix E provides the reasoning as to which references are used as default values in determining energy use. Appendix E also provides guidance if the user wants to override the default (e.g., the number of elevators is known). The following table provides a summary of the energy use factors included in CalEEMod. Depending on the type of parking land use description, the model uses the appropriate factor (or factors if structure with elevator).

Type of Parking	Energy Use	Total Annual (kWh per sq ft)
Open parking lot	Lighting	0.876
Unenclosed parking structure	Lighting	2.63
Enclosed parking structure	Lighting, ventilation	6.55
Parking structure with elevators	Elevators	0.19

## 7.2 Emissions from Energy use

The natural gas energy use will contribute both criteria and GHG emissions. The emission factors for natural gas combustion are based on AP-42 and CCAR. Electricity use will also contribute to both criteria and GHG emissions. However, the emissions from electricity use are only quantified for GHGs since criteria pollutant emissions occur at the site of the power plant which is likely to be offsite. Emissions are calculated by multiplying the energy use times the carbon intensity and other GHGs of the utility district per kilowatt hour. See section 8.2 for the electricity carbon intensity. In general:

$$\text{Emissions} = \sum_i (\text{EF} \times \text{Energy Intensity} \times \text{Size})$$

Where:

- EF = emission factor based on AP-42 or CCAR (kW-hr/sq ft or /DU)
- Energy Intensity = energy intensity for a land use (CO<sub>2</sub>e/kW-hr)
- Size = size of the building or Dwelling units (sq ft or DU)
- i = land use type

## 8 Water and Wastewater

The amount of water used and wastewater generated by a project has indirect GHG emissions associated with it. These emissions are a result of the energy used to supply, distribute, and treat the water and wastewater. It will often be the case that the water treatment and wastewater treatment occur outside of the project area. In this case, it is still important to quantify the energy and associated GHG emissions attributable to the water use. In addition to the indirect GHG emissions associated with energy use, wastewater treatment can directly emit both methane and nitrous oxide.

### 8.1 Annual Indoor and Outdoor Water Use by Land Use Category

Total residential indoor and outdoor water use for all of California for the year 2000 is reported in Table ES-1 of the Pacific Institute “Waste Not Want Not” report.<sup>37</sup> These values were divided by the total number of occupied households in California in the year 2000<sup>38</sup> to give water demand per dwelling unit. It is assumed that these water use values are representative of all residential dwelling unit types (single-family, apartment, condo, etc.) and will be used unless alternate values are supplied by the air districts or the end user.

Data for most commercial and industrial land uses was obtained from Appendices E and F of the Pacific Institute’s “Waste Not Want Not” report.<sup>39</sup> Total gallons of water used per day per metric were reported, where the metric is employee, student, room, acre, or square foot, depending on the land use. For example, water use at office and retail land uses was reported in a metric of gallons per employee per day, while water use at hotels and motels was reported in a metric of gallons per room per day. The total daily water use was converted to annual water use based on the number of days of operation for that land use. For example, it was assumed that schools operate for 180 days per year while offices operate for 225 days per year (excluding weekends and holidays). Figures in Appendices E and F of the Pacific Institute report shows the percent of water use dedicated to landscape irrigation; this percent was multiplied by the total water use to obtain the outdoor water use. The remainder was assigned to indoor water use.

For a few land uses (library, place of worship, movie theater, arena, and civic center), The Pacific Institute report did not provide sufficient data and so the American Water Works Association Research Foundation’s Commercial and Institutional End Uses of Water report<sup>40</sup>

<sup>37</sup> Gleick, P.H.; Haasz, D.; Henges-Jeck, C.; Srinivasan, V.; Cushing, K.K.; Mann, A. 2003. Waste Not, Want Not: The Potential for Urban Water Conservation in California. Published by the Pacific Institute for Studies in Development, Environment, and Security. Full report available online at: [http://www.pacinst.org/reports/urban\\_usage/waste\\_not\\_want\\_not\\_full\\_report.pdf](http://www.pacinst.org/reports/urban_usage/waste_not_want_not_full_report.pdf). Appendices available online at: [http://www.pacinst.org/reports/urban\\_usage/appendices.htm](http://www.pacinst.org/reports/urban_usage/appendices.htm)

<sup>38</sup> US Census Bureau. 2000 Census. Table QT-H1: General Housing Characteristics 2000. Available online at: [http://factfinder.census.gov/servlet/QTTable?\\_bm=y&-geo\\_id=04000US06&-qr\\_name=DEC\\_2000\\_SF1\\_U\\_QTH1&-ds\\_name=DEC\\_2000\\_SF1\\_U&-redoLog=false](http://factfinder.census.gov/servlet/QTTable?_bm=y&-geo_id=04000US06&-qr_name=DEC_2000_SF1_U_QTH1&-ds_name=DEC_2000_SF1_U&-redoLog=false).

<sup>39</sup> Gleick et al. 2003. Appendices E and F.

<sup>40</sup> Dziegielewski, B.; Kiefer, J.C.; Optiz, E.M.; Porter, G.A.; Lantz, G.L.; DeOreo, W.B.; Mayer, P.W.; Nelson, J.O. 2000. Commercial and Institutional End Uses of Water. Published by the American Water Works Association Research Foundation.

was used. This data is specific to Southern California and was obtained from sample sizes ranging from 1 to 26. In all cases, the total gallons of water used per employee per day was reported.

Specifically for industrial land use categories, the default indoor water use rate is 231,250 gallons/work-year/ thousand square feet. This value was computed by dividing the annual water use in California industry (Table ES-6 in Gleick et al. 2002; 963,071,916 gallons/industrial work day) by the industrial work area in California (Dun & Bradstreet, Business Population Report aggregated by Standard Industrial Classification (SIC) and Census Block, May 2002; 1,041,386 thousand square feet). This yields 925 gallons/work-day/thousand square feet and the annual value is derived using 250 workdays in a year. For those industrial projects where the anticipated water use rate is known or can be estimated from similar projects, the project specific indoor water use rate should overwrite the default value and specific rationale needs to be entered in the Remarks section of the Water and Wastewater CalEEMod input page.

Indoor water end-use intensities were also obtained from the Pacific Institute report.<sup>41</sup> End-use categories include toilets, showerheads, bathroom faucets, kitchen faucets, dishwashers, clothes washers, and leaks. End-use intensity is given in terms of percent of total indoor water use. For example, The Pacific Institute estimates that toilets contribute to 33% of indoor residential water use. Water end-use intensity must be known in order to calculate the expected water and GHG savings from installing low-flow or high-efficiency water fixtures.

**8.2 Electricity Intensity Factors**

Electricity intensity factors were obtained from the 2006 CEC report, “Refining Estimates of Water-Related Energy Use in California.” The electricity intensity factors are reported in units of kWh per million gallons (MG) of water used, and represent the amount of electricity needed to (1) supply and convey the water from the source, (2) treat the water to usable standards, and (3) distribute the water to individual users. The sum of these factors gives the total electricity required to supply, treat, and distribute water for outdoor uses. For indoor uses, the electricity needed to process the resulting wastewater is also included. The program will allow the end user to specify project specific electricity intensity factors if they are available for the project.

CO<sub>2</sub>e emissions associated with *indoor water use* are calculated according to the following equation:

$$\text{GHG emissions} = \text{Water}_{\text{indoor}} \times \text{Electricity}_{\text{indoor}} \times \text{Utility}$$

Where:

- GHG emissions = Tonnes CO<sub>2</sub>e
  - Water<sub>indoor</sub> = Total volume of water used indoors (million gallons)
  - Electricity<sub>indoor</sub> = Electricity required to supply, treat, and distribute water and the resulting wastewater (kWh/million gallons)
- This is assigned for each location.

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<sup>41</sup> Gleick et al. 2003. Residential end-use intensities found in Figure 2-4c of main report. Commercial end-use intensities found in Appendix E.

$$\text{Utility} = \text{Carbon intensity of Local Utility (CO}_2\text{e/kWh)}$$

CO<sub>2</sub>e emissions associated with *outdoor water use* are calculated according to the following equation:

$$\text{GHG emissions} = \text{Water}_{\text{outdoor}} \times \text{Electricity}_{\text{outdoor}} \times \text{Utility}$$

Where:

$$\text{GHG emissions} = \text{Tonnes CO}_2\text{e}$$

$$\text{Water}_{\text{outdoor}} = \text{Total volume of water used outdoors (million gallons)}$$

$$\text{Electricity}_{\text{outdoor}} = \text{Electricity required to supply, treat, and distribute water (kWh/million gallons)}$$

This is assigned for each location.

$$\text{Utility} = \text{Carbon intensity of Local Utility (CO}_2\text{e/kWh)}$$

The sum of emissions from indoor and outdoor water use for each land use category gives the total CO<sub>2</sub>e emissions associated with water use at the Project.

### 8.3 Wastewater Treatment Methods by County and Air District

Depending on the method, the treatment of wastewater can produce methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and carbon dioxide (CO<sub>2</sub>) emissions, which are all greenhouse gases. Methane and nitrous oxide emissions are converted to carbon dioxide equivalent (CO<sub>2</sub>e) emissions based on their GWP. When a development generates waste and wastewater, the waste is typically either treated on-site in septic tanks or sent to a centralized wastewater treatment plant to be treated by one of several possible methods. The various wastewater treatment methods employed by each county or air district and the percent of total wastewater treated by each method was used if provided, otherwise the default percentage used in ARB's GHG emission inventories was used. Wastewater treatment methods include on-site septic tanks and centralized wastewater treatment plants which may be composed of aerobic processes, or facultative lagoons. The solids from the latter two treatments could be digested anaerobically to produce digester gas. In some cases, the combusted digester gas may be part of a cogeneration system which recovers the heat generated from combustion and generates electricity which is used for on-site processes. Thus, for aerobic and facultative lagoons wastewater treatment, digestion (*listed in the last two column on the wastewater screen*) should equal 100% percent. For septic systems, the digestion could be zero percent or 100 percent.

The majority of nitrous oxide emissions are generated when treated wastewater is discharged to water bodies as effluent. The default assumption is for non-recycled water. The program calculates total GHG emissions from wastewater treatment based on the region-specific distribution of wastewater treatment methods which the end user can modify with project specific data.

### 8.4 Wastewater Treatment Methods – Calculation of Greenhouse Gas Emissions

The GHGs emitted from each type of wastewater treatment are based on the ARB’s Local Government Operations Protocol (LGOP)<sup>42</sup>, which are in turn based on USEPA methodologies.<sup>43</sup> The methodologies are summarized below.

Wastewater (or sewage) treatment can occur one of three ways - aerobically, in septic tanks or in facultative lagoons, specifically described below. In CalEEMod, the following defaults for sewage treatment options were used unless an air district provided an alternative percentage of treatment appropriate to the particular project region. The user has the ability to override the defaults but the total percentage must equal 100% and must justify the reason for the change in the “Remarks” box at the bottom of the screen.

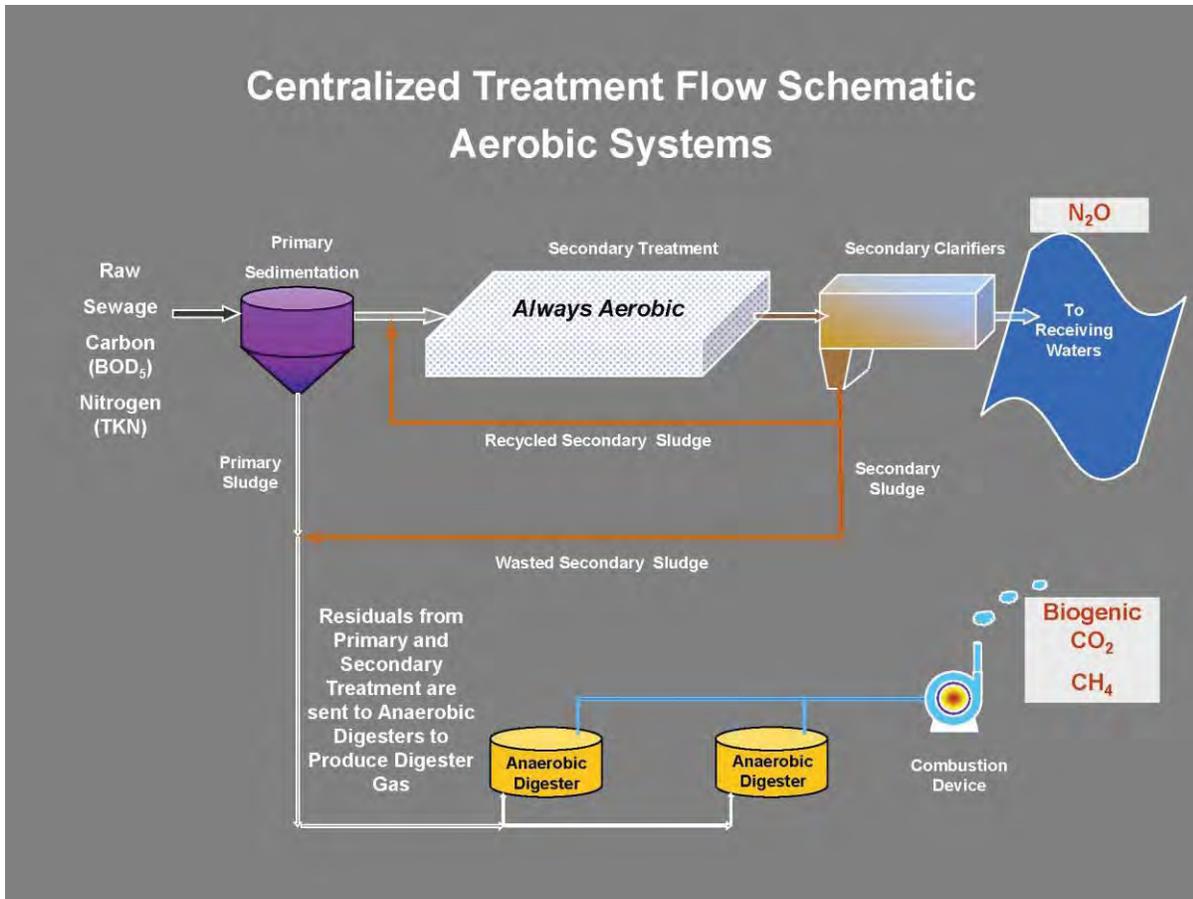
Statewide Default Treatment Distribution		
Septic Tank (%)	Aerobic (%)	Facultative Lagoons (%)
10.33	87.46	2.21

Solids produced from primary treatment, aerobic processes, or facultative lagoons are typically digested in anaerobic digesters. The gas produced by these digesters may be flared or burned in some other simple device, or sent to a cogeneration process for heat recovery and/or electrical generation. The default condition is to assume no cogeneration; however, the user has the ability to input an estimate of the percentage of the digester gas combusted in such systems ranging from 0% to 100%.

Anaerobic decomposition in septic tanks and facultative lagoons can produce fugitive emissions of methane. The following figure provides an example of the process flow for a centralized wastewater treatment facility that treats the sewage aerobically, produces digester gas in anaerobic digesters and combusts the gas. The figure also shows where the GHG emissions are occurring in the process.

<sup>42</sup> CARB. 2008. Local Government Operations Protocol. Chapter 10: Wastewater Treatment Facilities. Available online at: [http://www.arb.ca.gov/cc/protocols/localgov/pubs/final\\_lgo\\_protocol\\_2008-09-25.pdf](http://www.arb.ca.gov/cc/protocols/localgov/pubs/final_lgo_protocol_2008-09-25.pdf)

<sup>43</sup> USEPA. 2008. Inventory of US Greenhouse Gas Emissions and Sinks: 1990-2006. Chapter 8: Waste. Available online at: [http://www.epa.gov/climatechange/emissions/downloads/08\\_CR.pdf](http://www.epa.gov/climatechange/emissions/downloads/08_CR.pdf)



As depicted in the figure above, nitrous oxide is produced when treated wastewater is released as effluent into aquatic environments such as rivers and estuaries. Although nitrification/denitrification processes within the wastewater treatment plant may also produce nitrous oxide, the USEPA estimated that this contributed to less than 3% of national N<sub>2</sub>O emissions associated with wastewater in 2005.<sup>44</sup> Therefore, the program assumes that all N<sub>2</sub>O emissions are generated from effluent discharged into aquatic environments.

CO<sub>2</sub> emissions are generated from both aerobic and anaerobic processes, as well as from the combustion of digester gas, but CalEEMod only calculates combustion emissions because there are currently no authoritative emission factors for process CO<sub>2</sub> emissions. When digester gas is combusted to generate electricity, fossil fuel emissions are offset by this renewable power generation. CalEEMod allows the user to provide an estimate of how much renewable power is expected from the project and will debit the biogenic combustion CO<sub>2</sub> with the CO<sub>2</sub> that would otherwise have been sourced from fossil fuel combustion.

<sup>44</sup> USEPA. 2008. Page 8-7.

**Septic Systems**

Developments may use *septic systems* to treat wastewater on-site. These systems utilize microbes to decompose wastewater anaerobically. A by-product of this anaerobic decomposition is methane, which is quantified using **Equation 10.5** from LGOP:

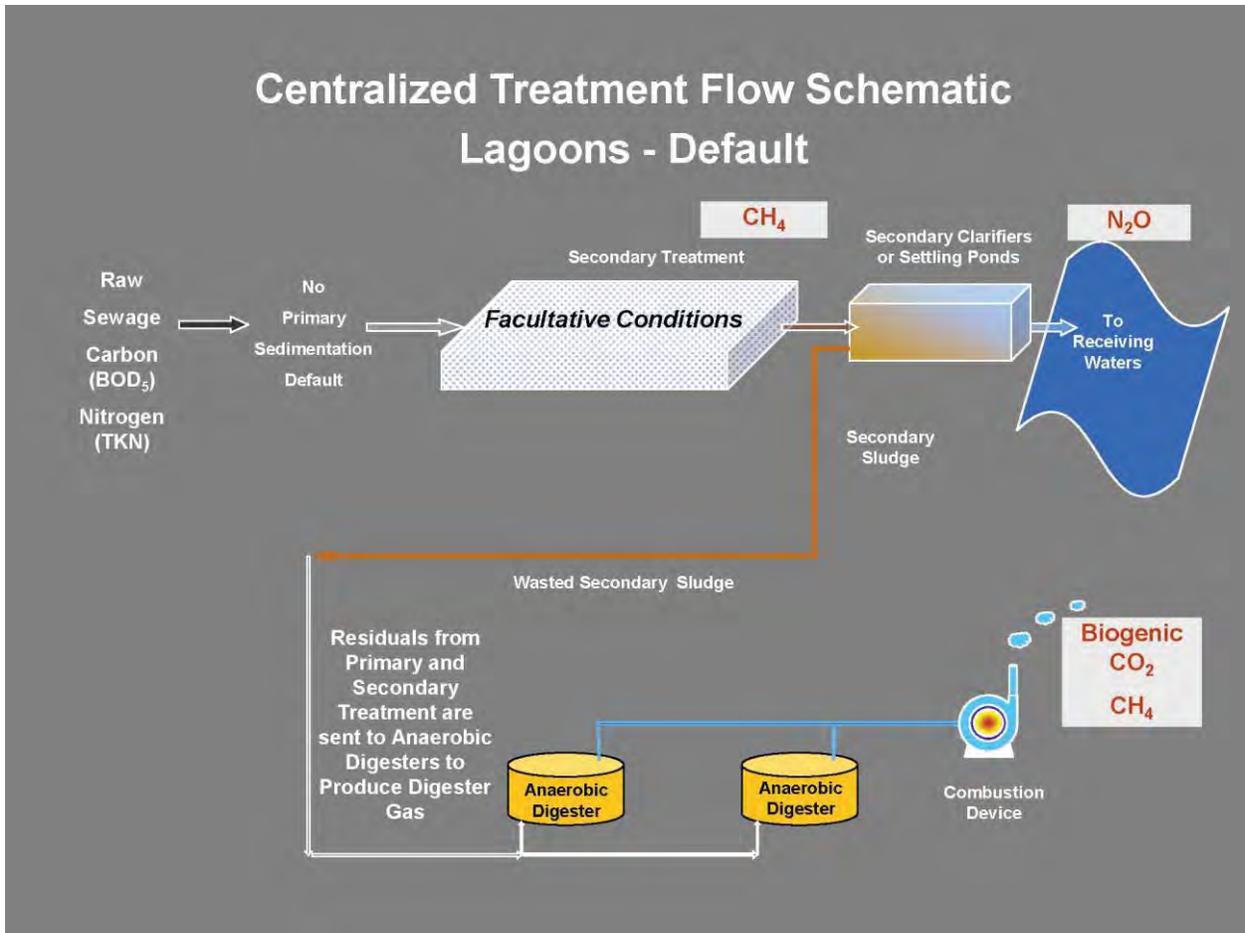
$$\text{CH}_4 \text{ emissions (MT)} = \text{Wastewater} \times \text{BOD}_5 \text{ load} \times 10^{-6} \times \text{Bo} \times \text{MCF}_{\text{septic}} \times 10^{-3}$$

Term	Description	Value	Unit	Reference
Wastewater	= volume of wastewater	INPUT	liters	User
BOD <sub>5</sub> load	= concentration of BOD <sub>5</sub> in wastewater	200	mg / liter wastewater	
10 <sup>-6</sup>	= conversion factor	--	kg / mg	--
Bo	= maximum CH <sub>4</sub> -producing capacity for domestic wastewater	0.6	kg CH <sub>4</sub> / kg BOD <sub>5</sub> removed	LGOP default
MCF <sub>septic</sub>	= CH <sub>4</sub> correction factor for septic systems	0.5	--	LGOP default
10 <sup>-3</sup>	= conversion factor	--	MT / kg	--

The LGOP provides default values for all terms in the equation except BOD<sub>5</sub> load, which is the amount of BOD<sub>5</sub> sent to these decentralized systems per day. BOD, or Biochemical Oxygen Demand, measures the degradable organic component of the wastewater that could deplete dissolved oxygen in receiving waters if left untreated (BOD<sub>5</sub> is the measurement of dissolved oxygen depletion from a liquid sample held for a 5-day test). The program assumes a default BOD<sub>5</sub> load value of 200 mg per liter of wastewater. This value is typical for residential and commercial wastewater. A higher value is typically associated with certain types of industrial wastewater.

**Facultative Lagoons**

Centralized wastewater treatment facilities may use *facultative lagoons* to treat wastewater. The following figure is an example of the treatment process if facultative lagoons provide the secondary treatment assuming process solids are sent to anaerobic digesters and the digester gas is combusted. In addition, the figure shows where the GHG emissions are occurring in the process.



The methane emissions expected from facultative lagoons are calculated using **Equation 10.3** from LGOP:

$$\text{CH}_4 \text{ emissions (MT)} = \text{Wastewater} \times \text{BOD}_5 \text{ load} \times 10^{-6} \times (1 - F_P) \times B_o \times \text{MCF}_{\text{anaerobic}} \times F_{\text{removed}} \times 10^{-3}$$

Term	Description	Value	Unit	Reference
Wastewater	= volume of wastewater	INPUT	liters	User
BOD <sub>5</sub> load	= concentration of BOD <sub>5</sub> in wastewater	200	mg / liter wastewater	
10 <sup>-6</sup>	= conversion factor	--	kg / mg	--
F <sub>P</sub>	= fraction of BOD <sub>5</sub> removed in primary treatment	0	--	no primary treatment
B <sub>o</sub>	= maximum CH <sub>4</sub> -producing capacity for domestic wastewater	0.6	kg CH <sub>4</sub> / kg BOD <sub>5</sub> removed	LGOP default
MCF <sub>anaerobic</sub>	= CH <sub>4</sub> correction factor for anaerobic systems	0.8	--	LGOP default

$F_{\text{removed}}$	=	fraction of overall lagoon BOD <sub>5</sub> removal performance	1	--	LGOP default (see Eq. 10.4)
$10^{-3}$	=	conversion factor	--	MT / kg	--

The LGOP provides default values for all terms in the equation except BOD<sub>5</sub> load and  $F_p$ , the fraction of BOD<sub>5</sub> removed in primary treatment, if present. As before, the program assumes a default BOD<sub>5</sub> load value of 200 mg per liter of wastewater. The program assumes  $F_p = 0$ , indicating no primary treatment.

### Anaerobic Digestion

*Anaerobic digesters* produce methane-rich biogas which is typically combusted on-site. In some cases the biogas is combusted simply for the purpose of converting methane to CO<sub>2</sub>, which has a lower global warming potential than methane. In many cases, a cogeneration system is used to harvest the heat from combustion and use it to generate electricity for on-site energy needs. In both cases, inherent inefficiencies in the system result in incomplete combustion of the biogas, which results in remaining methane emissions. The methane emissions from incomplete combustion of digester gas are quantified using **Equation 10.1** from LGOP:

$$\text{CH}_4 \text{ emissions (MT)} = \text{Wastewater} \times \text{Digester Gas} \times F_{\text{CH}_4} \times \rho_{\text{CH}_4} \times (1-\text{DE}) \times 0.0283 \times 10^{-3} \times 10^{-3}$$

Term	Description	Value	Unit	Reference
Wastewater	= volume of wastewater	INPUT	gallons	User
Digester Gas	= volume of biogas generated per volume of wastewater treated	0.01	ft <sup>3</sup> biogas / gallon wastewater	USEPA 2008
$F_{\text{CH}_4}$	= fraction of CH <sub>4</sub> in biogas	0.65	--	USEPA 2008
$\rho_{\text{CH}_4}$	= density of CH <sub>4</sub> at standard conditions	662.00	g / m <sup>3</sup>	LGOP default
DE	= CH <sub>4</sub> destruction efficiency	0.99	--	LGOP default
0.0283	= conversion factor	--	m <sup>3</sup> / ft <sup>3</sup>	LGOP default
$10^{-3}$	= conversion factor	--	MT / kg	--
$10^{-3}$	= conversion factor	--	kg / g	--

The LGOP provides default values for all terms in the equation except the volume of digester gas produced per day (Digester Gas), and the fraction of methane in the biogas ( $F_{\text{CH}_4}$ ). The program assumes a digester gas production of 0.01 cubic feet of biogas per gallon of

wastewater treated based on USEPA methodology.<sup>45,46</sup> The program assumes  $F_{CH_4} = 0.65$  based on the USEPA methodology.<sup>47</sup>

The amount of biogenic CO<sub>2</sub> produced from the combustion of biogas is calculated using the following equation based on flow sent to centralized systems (i.e., not sent to septic tanks):

$$\text{Biogenic CO}_2 \text{ emissions (MT CO}_2\text{)} = \text{Wastewater} \times \text{Digester Gas} \times F_{CH_4} \times EF / 2204.623$$

Where:

Wastewater	=	Volume of Wastewater sent to centralized systems (gallons)
Digester Gas	=	Volume of biogas produced from wastewater treatment 0.01 ft <sup>3</sup> biogas / gallon wastewater treated
$F_{CH_4}$	=	Fraction of CH <sub>4</sub> in biogas 0.65
EF	=	Emission factor for methane combustion <sup>48</sup> 0.120 lb CO <sub>2</sub> / ft <sup>3</sup> CH <sub>4</sub>
2204.623	=	Conversion factor from lb CO <sub>2</sub> to MT CO <sub>2</sub>

If a *cogeneration system* is used to generate electricity from the combusted biogas, the following equation derived from USEPA’s Solid Waste Management and Greenhouse Gases report<sup>49</sup> is used to calculate the amount of electricity generated based on flow sent to centralized systems.

$$\text{Electricity Generated (kWh)} = \text{Wastewater} \times \text{Digester Gas} \times F_{CH_4} \times HHV_{CH_4} \times ECF \times EFF$$

Where:

Wastewater	=	Volume of Wastewater sent to centralized systems (gallons)
Digester Gas	=	Volume of biogas produced from wastewater treatment

<sup>45</sup> USEPA 2008. Page 8-9. USEPA estimates 1.0 cubic feet of digester gas per person per day and 100 gallons of wastewater per person per day.

<sup>46</sup> USEPA reports 1.0 cubic feet of digester gas per person per day based on Metcalf & Eddy, Inc., 1991, “Wastewater Engineering: Treatment, Disposal, and Reuse,” 3<sup>rd</sup> Ed. McGraw Hill Publishing. USEPA reports 100 gallons of wastewater per person per day based on Great Lakes-Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers, 2004, “Recommended Standards for Wastewater Facilities (Ten-State Standards).” USEPA also reports 100 gallons of wastewater per person per day on the USEPA Water & Wastewater Pricing website, based on the U.S. Geological Survey Circular 1200, 1995, “Estimated Use of Water in the United States in 1995.” Available online at: <http://www.epa.gov/waterinfrastructure/pricing/>. Accessed May 2010.

<sup>47</sup> USEPA. 2008. Page 8-9. USEPA cites Metcalf & Eddy, Inc., 1991, “Wastewater Engineering: Treatment, Disposal, and Reuse,” 3<sup>rd</sup> Ed. McGraw Hill Publishing.

<sup>48</sup> USDOE. 2005. Form EIA-1605: Long Form for Voluntary Reporting of Greenhouse Gases. Available online at: [ftp://ftp.eia.doe.gov/pub/oiaf/1605/cdrom/pdf/FormEIA-1605\\_2004\\_Instructions.pdf](ftp://ftp.eia.doe.gov/pub/oiaf/1605/cdrom/pdf/FormEIA-1605_2004_Instructions.pdf)

<sup>49</sup> USEPA. 2006. Solid Waste Management and Greenhouse Gases: A Life-Cycle Assessment of Emissions and Sinks, 3rd Ed. Sections 6.2-6.5. Available online at: <http://www.epa.gov/climatechange/wycd/waste/downloads/fullreport.pdf>

0.01 ft<sup>3</sup> biogas / gallon wastewater treated

F <sub>CH4</sub>	=	Fraction of CH <sub>4</sub> in biogas 0.65
HHV	=	Heating value of methane 1,012 BTU / ft <sup>3</sup> CH <sub>4</sub>
ECF	=	Energy conversion factor 0.00009 kWh/BTU
EFF	=	Efficiency Factor <sup>50</sup> 0.85

Since this amount of electricity is generated on-site and no longer needs to be supplied by the local electricity utility, the indirect CO<sub>2</sub>e emissions associated with that utility electricity generation are also avoided. The avoided CO<sub>2</sub>e emissions are calculated by multiplying the amount of electricity generated (in kWh) by the local utility carbon-intensity factor from Table 2.8.

Net CO<sub>2</sub> emissions are then the difference between the CO<sub>2</sub> produced from the combustion of digester gas and the CO<sub>2</sub> avoided by generating renewable energy, thus:

$$\text{Net CO}_2 \text{ Emissions} = \text{CO}_2 \text{ (digester gas combustion)} - \text{CO}_2 \text{ (avoided emissions)}$$

Nitrous oxide is produced when treated wastewater is discharged to aquatic environments such as rivers or estuaries. The nitrogen which remains in treated wastewater effluent is converted to nitrous oxide in a multi-step process accomplished by bacteria which is present in soil and aquatic environments. The nitrous oxide emissions are quantified using **Equation 10.9** from the LGOP:

$$\text{N}_2\text{O emissions (MT)} = \text{Wastewater} \times 10^{-6} \times \text{N Load} \times 44/28 \times \text{EF effluent} \times 10^{-3}$$

Term	Description	Value	Unit	Reference
Wastewater	= volume of wastewater	INPUT	liters	User
10 <sup>-6</sup>	= conversion factor	--	kg / mg	--
N Load	= mass of nitrogen discharged per volume of wastewater	26	mg / liter of wastewater	USEPA 2013 (CA Statewide Average)
44/28	= Ratio of molecular weights for N <sub>2</sub> O and N <sub>2</sub>			USEPA 2008

<sup>50</sup> Ibid. USEPA assumes a 15% system efficiency loss, to account for system down-time. USEPA assumes that methane is flared during down-time.

EF effluent	=	N <sub>2</sub> O effluent emission factor	0.005	kg N <sub>2</sub> O / kg N	LGOP default
10 <sup>-3</sup>	=	conversion factor	--	MT / kg	--

The LGOP provides default values for all terms in the equation except N Load, the total mass of nitrogen discharged in the wastewater effluent per day. CalEEMod assumes N Load = 26 mg N per liter of wastewater effluent based on the USEPA methodology.<sup>51</sup> This value is appropriate for residential and commercial wastewater. A higher value may be more appropriate for certain types of industrial wastewater.

Methane and nitrous oxide emissions are converted to carbon dioxide equivalent emissions by multiplying by their GWPs. The GWPs for methane and nitrous oxide are 21 and 310, respectively.<sup>52</sup>

## 9 Solid Waste

Municipal solid waste (MSW) is the amount of material that is disposed of by land filling, recycling, or composting. CalEEMod calculates the indirect GHG emissions associated with waste that is disposed of at a landfill. The program uses annual waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses. If waste disposal information was not available, waste generation data was used. CalEEMod uses the overall California Waste Stream composition to generate the necessary types of different waste disposed into landfills. The program quantifies the GHG emissions associated with the decomposition of the waste which generates methane based on the total amount of degradable organic carbon.<sup>53</sup> The program will also quantify the CO<sub>2</sub> emissions associated with the combustion of methane, if applicable. Default landfill gas concentrations were used as reported in Section 2.4 of AP-42. The IPCC has a similar method to calculate GHG emissions from MSW in its 2006 Guidelines for National Greenhouse Gas Inventories.

The amount of methane and CO<sub>2</sub> generated is calculated as:

$$Gen = DOC \cdot DANF \cdot 0.5$$

Where:

<sup>51</sup> USEPA. 2013. California Statewide average. USEPA Database at [http://cfpub.epa.gov/dmr/ez\\_search.cfm](http://cfpub.epa.gov/dmr/ez_search.cfm)

<sup>52</sup> Provided in Appendix E, Table E.1 of CARB's LGOP. As specified in Appendix E, Second Assessment Report (SAR) GWPs are still used by international convention and the United States.

<sup>53</sup> Landfill gas generation is dependent upon the amount, type, age and moisture content of the disposed waste. The United States Environmental Protection Agency (USEPA) has developed emission factors for landfill gas as specified in Section 2.4 of AP-42 which are incorporated in the LANDGEM model. This model uses a first order decay equation that will vary with time. However, there is no need to use a time-varying emissions model, as we are interested in total emissions of gases that could be emitted from a ton of waste. Therefore, instead of using the LANDGEM model, the volume of landfill gas from solid waste will be based on the total amount of degradable organic carbon.

Gen = Amount of CO<sub>2</sub> or methane generated

DOC = Degradable organic carbon

DANF = Degradable anaerobic fraction (0.5)

0.5 = Assumes half anaerobic carbon is methane and other half is CO<sub>2</sub>.

IPCC lists default values for the DOC in its 2006 Guidelines in Table 2.4.

The amount of methane and CO<sub>2</sub> emitted is calculated by assuming collection and destruction efficiencies. The end user will be able to select if the landfill the waste is sent to has a landfill gas collection system. The collection efficiency will be assumed to be 75% if this is selected otherwise it will be 0%. The destruction efficiency is assumed to be 98%. The calculations take into account the oxidation of methane to CO<sub>2</sub> as it rises through the landfill. The methane and CO<sub>2</sub> emitted are described as:

$$Emit_{methane} = Gen \cdot [Collect \cdot (1 - destruct) + (1 - Collect) \cdot (1 - ox)]$$

$$Emit_{CO_2} = Gen \cdot [Collect \cdot destruct + (1 - Collect) \cdot (ox) + 1]$$

Where

Emit<sub>methane</sub> = Methane emitted per ton of green waste

Emit<sub>CO2</sub> = Carbon dioxide emitted per ton of green waste

Gen = Amount of CO<sub>2</sub> or methane generated

Collect = Collection efficiency of landfill gas (75%)

Destruct = Destruction efficiency of landfill gas (98%)

Ox = Oxidation efficiency of methane (10%)

The CO<sub>2</sub> emissions will be classified as biogenic emissions. The amount of methane emitted will be multiplied by its GWP to convert to CO<sub>2</sub>e.

## 10 Vegetation

The program calculates GHG emissions associated with the vegetation activities of land use change and the planting of new trees.

The program calculates GHG emissions from vegetation activities according to the IPCC protocol for vegetation since it has default values that work well with the information typically available for development projects. This method is similar to the CAR Forest Protocol<sup>54</sup> and the Center for Urban Forest Research Tree Carbon Calculator<sup>55</sup>, but it has more general default values available that will generally apply to all areas of California without requiring detailed site-specific information<sup>56</sup>.

### 10.1 Land Use Change

A development which changes land use type results in changes in CO<sub>2</sub> sequestration from the atmosphere which would not have been captured had there been no land-type change.

Overall Change in Sequestered CO<sub>2</sub> [MT CO<sub>2</sub>]

$$= \sum_i (SeqCO_2)_i \times (area)_i - \sum_j (SeqCO_2)_j \times (area)_j$$

Where:

SeqCO <sub>2</sub>	=	mass of sequestered CO <sub>2</sub> per unit area [MT CO <sub>2</sub> /acre]
area	=	area of land for specific land use type [acre]
i	=	index for final land use type
j	=	index for initial land use type

Overall change in sequestered CO<sub>2</sub> is the summation of sequestered CO<sub>2</sub> from initial land use type multiplied by area of land for initial land use type subtracted by the summation of sequestered CO<sub>2</sub> from final land use type multiplied by area of land for final land use type.

There is no reduction in GHG emissions associated with preservation of a land.

#### SeqCO<sub>2</sub>

The mass of sequestered CO<sub>2</sub> per unit area [MT CO<sub>2</sub>/acre] is dependent on the specific land use type. The program uses default CO<sub>2</sub> sequestration values from CCAR for each land use that will be preserved or created:

<sup>54</sup> CCAR. 2007. Forest Sector Protocol Version 2.1. September. Available at: [http://www.climateregistry.org/resources/docs/protocols/industry/forest/forest\\_sector\\_protocol\\_version\\_2.1\\_sept2007.pdf](http://www.climateregistry.org/resources/docs/protocols/industry/forest/forest_sector_protocol_version_2.1_sept2007.pdf)

<sup>55</sup> Available at: <http://www.fs.fed.us/ccrc/topics/urban-forests/ctcc/>

<sup>56</sup> The CAR Forest Protocol and Urban Forest Research Tree Carbon Calculator are not used since their main focus is annual emissions for carbon offset considerations. As such they are designed to work with very specific details of the vegetation that is not available at a CEQA level of analysis.

Land Use	Sub-Category	Default CO <sub>2</sub> accumulation per acre (MT CO <sub>2</sub> / acre)
Forest Land	Scrub	14.3
	Trees	111
Cropland	--	6.20
Grassland	--	4.31
Wetlands	--	0

The default annual CO<sub>2</sub> is calculated by multiplying total biomass (MT dry matter/acre) from IPCC data by the carbon fraction in plant material (0.47), then using the ratio of molecular weights (44/12) to convert from MT of carbon (C) to MT of carbon dioxide (CO<sub>2</sub>).

#### Vegetation Type

Vegetation types are defined by IPCC as follows:

##### **(i) Forest Land**

This category includes all land with woody vegetation consistent with thresholds used to define Forest Land in the national greenhouse gas inventory. It also includes systems with a vegetation structure that currently fall below, but *in situ* could potentially reach the threshold values used by a country to define the Forest Land category.

##### **(ii) Cropland**

This category includes cropped land, including rice fields, and agro-forestry systems where the vegetation structure falls below the thresholds used for the Forest Land category.

##### **(iii) Grassland**

This category includes rangelands and pasture land that are not considered Cropland. It also includes systems with woody vegetation and other non-grass vegetation such as herbs and brushes that fall below the threshold values used in the Forest Land category. The category also includes all grassland from wild lands to recreational areas as well as agricultural and silvi-pastoral systems, consistent with national definitions.

##### **(iv) Wetlands**

This category includes areas of peat extraction and land that is covered or saturated by water for all or part of the year (e.g., peatlands) and that does not fall into the Forest Land, Cropland, Grassland or Settlements categories. It includes reservoirs as a managed sub-division and natural rivers and lakes as unmanaged sub-divisions.

#### Area

The user must specify area of land in acres for specific final and initial land use types. These area changes include not only the area of land that will be converted to buildings, but also areas disrupted by the construction of utility corridors, water tank sites, and associated borrow and

grading areas. Areas temporarily disturbed that will eventually recover to become vegetated will not be counted as vegetation removed as there is no net change in vegetation or land use.<sup>57</sup>

## 10.2 Sequestration

Planting trees will sequester CO<sub>2</sub> and is considered to result in a one-time carbon-stock change. Trees sequester CO<sub>2</sub> while they are actively growing. The amount of CO<sub>2</sub> sequestered depends on the type of tree.

$$\text{Total Sequestered CO}_2 = (\text{Growing Period} \times \sum_{i=1}^n [\text{Sequestration } i \times \text{Trees } i])$$

Where:

Growing Period = Growing period for all trees, expressed in years (20).

$n$  = Number of broad species classes.

Sequestration  $i$  = Default annual CO<sub>2</sub> accumulation per tree for broad species class  $i$ .

Trees  $i$  = Number of net new trees of broad species class  $i$ .

Total Sequestered CO<sub>2</sub> is the growing period for all trees multiplied by the summation of annual CO<sub>2</sub> accumulation multiplied by the number of new trees per broad species class.

### Growing Period

The program assumes the IPCC active growing period of 20 years. Thereafter, the accumulation of carbon in biomass slows with age, and will be completely offset by losses from clipping, pruning, and occasional death. Actual active growing periods are subject to, among other things, species, climate regime, and planting density. Note that trees may also be replaced at the end of the 20-year cycle, which would result in additional years of carbon sequestration. However, this would be offset by the potential net release of carbon from the removal of the replaced tree.

<sup>57</sup> This assumption facilitates the calculation as a yearly growth rate and CO<sub>2</sub> removal rate does not have to be calculated. As long as the disturbed land will indeed return to its original state, this assumption is valid for time periods over 20 years.

Sequestration

The program uses default annual CO<sub>2</sub> accumulation per tree for broad species class as follows:

<b>Broad species class</b>	<b>Default annual CO<sub>2</sub> accumulation per tree<sup>1</sup> (MT CO<sub>2</sub>/ year)</b>
Aspen	0.0352
Soft maple	0.0433
Mixed hardwood	0.0367
Hardwood maple	0.0521
Juniper	0.0121
Cedar/larch	0.0264
Douglas fir	0.0447
True fir/Hemlock	0.0381
Pine	0.0319
Spruce	0.0337
Miscellaneous <sup>2</sup>	0.0354

1. IPCC's carbon (C) values converted to carbon dioxide (CO<sub>2</sub>) using ratio of molecular weights (44/12).
2. Average of all other broad species classes. To be assumed if tree type is not known.

# 11 Mitigation

## 11.1 Construction Mitigation Measures and Regulatory Adjustments

The section below describes the types of reduction in emissions that CalEEMod incorporates. All end user information required in this section will require the end user to supply a source to support the parameter they select. This source will be displayed in the result output to enhance the communication of the assumptions used in determining the final mitigated emissions reported.

### Mitigation Measures for Onsite Off-Road Construction Diesel Equipment

The emissions mitigation measures for onsite off-road construction diesel equipment include use of alternative fuel, electric equipment, diesel particulate filter (DPF), oxidant catalyst, newer tier engines, and dust suppression. The program has options allowing the user to apply mitigation measures to single piece of equipment or the entire fleet.

#### Exhaust Emissions Reduction

**Alternative Fuel:** The use of alternative fuels (i.e., biodiesel, compressed natural gas, propane, etc.) can change the emissions for both criteria and GHG emissions. Alternative fuels can change emissions (increase or decrease) for each pollutant. These values are based on values for alternative fuels in OFFROAD2011. Therefore they may not be available for all pieces of equipment. The biodiesel emissions are based on a report from NREL<sup>58</sup>. Biodiesel emissions are separated into both biogenic and non-biogenic CO<sub>2</sub> emissions. These values may be a slight under estimation since no starting or evaporative emissions are calculated in the program.

**Electric Equipment:** The use of electric equipment reduces emissions by 100% for all criteria pollutants. However, there are indirect GHG emissions associated with the electricity use. This is calculated by converting the horsepower to kilowatts and multiplying by the electricity carbon intensity factor. This is only available for those pieces of equipment where values have been identified as listed in the CAPCOA's Quantification of Greenhouse Gas Mitigation Measures.

**DPF:** The use of DPFs reduces the emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. The program allows the end user to choose filters that meet different ARB standardized abatement and certification levels as needed<sup>59</sup>. The program also allows the end user to enter filter specification in case a filter with higher abatement level becomes available.

**Diesel Oxidation Catalyst:** The use of an oxidation catalyst assumes the combination operation of a selective catalytic reduction (SCR) that reduces NOx emissions by 0 to 40% percent<sup>60</sup>. Minor PM emissions reductions are also achieved.

**Newer Tier Engines:** The program allows the end user to choose newer engines that meet more stringent USEPA tier emissions standards than is anticipated from the statewide fleet mix.

<sup>58</sup> <http://www.nrel.gov/docs/fy06osti/37508.pdf> (see Table 2)

<sup>59</sup> <http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

<sup>60</sup> [www.aqmd.gov/ceqa/handbook/mitigation/offroad/TableIII.doc](http://www.aqmd.gov/ceqa/handbook/mitigation/offroad/TableIII.doc)

If this option is checked, user will be required to enter the expected tier level, and CalEEMod will use the emission standard of the selected tier for the emissions calculation<sup>61</sup>.

The mitigation measure-pollutant applicability matrix presented in the table below:

Mitigation Measure	Applicability						
	VOC	SOx	NOx	PM <sub>10</sub>	PM <sub>2.5</sub>	GHG Anthropogenic	GHG Biogenic
Alternative Fuel		x	x	x	x	x	x
Electric Equipment	x	x	x	x	x	x	x
DPF				x	x		
Diesel Oxidation Catalyst/SCR			x	x	x		
Newer Tier Engines	x	x	x	x	x		
User Input	x	x	x	x	x	x	x

**Fugitive Dust Emissions Reduction**

The mitigation measures in this section apply the specified percent reduction in PM<sub>10</sub> or PM<sub>2.5</sub> to the applicable fugitive dust calculations. Watering of unpaved roads recalculates the unpaved road equations using the updated values supplied by the user in this section. These are based on mitigation measures described by SCAQMD<sup>62</sup>.

**11.2 Mobile Mitigation**

All mitigation associated with mobile sources is consistent with the methods described in CAPCOA’s Quantification of GHG Mitigation Measures.

**11.3 Hearths Mitigation Measures**

The end user will be able to change the default percentage of hearths including no hearths or all natural gas hearths. This will recalculate the number of hearths and the corresponding emissions.

**11.4 Architectural Coating Mitigation**

The end user can select lower VOC content in paints than required by regulation. This value will be used instead of the usual emission factor.

**11.5 Landscape Equipment Mitigation**

The end user will be able to specify the percentage of landscape equipment that will be electric. This will be incorporated consistent with CAPCOA Mitigation Measures methodology.

<sup>61</sup> ARB and USEPA Off-Road Compression-Ignition (Diesel) Engine Standard available here: [http://www.arb.ca.gov/msprog/ordiesel/documents/Off-Road\\_Diesel\\_Std.xls](http://www.arb.ca.gov/msprog/ordiesel/documents/Off-Road_Diesel_Std.xls)

<sup>62</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/MM\\_fugitive.html](http://www.aqmd.gov/ceqa/handbook/mitigation/fugitive/MM_fugitive.html)

**11.6 Improve Building Envelope Beyond Title 24 part 6**

The end user will enter their commitment to improve building envelope related systems (space heating, space cooling, water heating, and ventilation) beyond current Title 24 regulations. The end user will enter the percentage improvement.

**11.7 Install Energy Efficient Appliances**

The end user can designate the appliances that they will install that meet USEPA's Energy Star criteria. In order to meet CEQA enforceability criteria, these appliances need to be supplied by the builder. The program will use the average savings for an Energy Star appliance as reported in the Energy Star's most recent annual report. The following appliances will be available: refrigerators, dish washers, fans, and clothes washers. The reduction will only apply to these end uses.

**11.8 Install Renewable or Alternative Energy systems**

The end user will be able to specify the percentage of the electricity use that will be supplied from renewable or alternative energy systems. This includes energy from sources such as photovoltaic cells, wind turbines, geothermal sources, and fuel cells. The end user will enter the total annual kilowatt-hours anticipated to be generated or the percentage of the annual building energy that will be supplied by the alternative energy systems. Information on how to calculate these can be found in CAPCOA's Quantification of Greenhouse Gas Mitigation Measures.

**11.9 Water Mitigation**

All water mitigation methods are consistent with those described in the CAPCOA Quantifying GHG Mitigation Measures document.

**11.10 Waste Mitigation**

The amount of waste disposed will be reduced by the percentage entered by the user. There is no reallocation of the type of material disposed.

# Air Toxics Hot Spots Program

Risk Assessment Guidelines

Guidance Manual for  
Preparation of Health Risk  
Assessments

February 2015



Air, Community, and Environmental Research Branch  
Office of Environmental Health Hazard Assessment  
California Environmental Protection Agency

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*February 2015*

**Air Toxics Hot Spots Program  
Risk Assessment Guidelines**

**The Air Toxics Hot Spots Program Guidance Manual  
for Preparation of Health Risk Assessments**

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## Preface

The draft of the *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (Guidance Manual) is a description of the algorithms, recommended exposure variates, cancer and noncancer health values, and the air modeling protocols needed to perform a health risk assessment (HRA) under the Air Toxics Hot Spots Information and Assessment Act of 1987 (Health and Safety Code Section 44300 et seq., see Appendix B). The Children's Environmental Health Protection Act of 1999 (Health and Safety Code Section 39606, also contained in Appendix B), which requires explicit consideration of infants and children in assessing risks from air toxics, necessitated revisions of the methods for both noncancer and cancer risk assessment, and of the exposure variates. This draft version of the Guidance Manual updates the previous version (OEHHA, 2003), and reflects advances in the field of risk assessment along with explicit consideration of infants and children.

The information presented in the draft manual is compiled from three technical support documents (TSDs) released by the Office of Environmental Health Hazard Assessment (OEHHA) for the Hot Spots Program. The three TSDs (which are also revised versions, replacing the original four Hot Spots TSDs adopted between 1999 and 2003) underwent public comment and peer review and were adopted for use in the Air Toxics Hot Spots program by the Director of OEHHA. The Technical Support Document for the Derivation of Noncancer Reference Exposure Levels (June, 2008) addressed the methodology for deriving acute, chronic and eight hour Reference Exposure Levels. The Technical Support Document for Cancer Potency Factors (May 2009) addresses the methodology for deriving cancer potency factors and adjusting cancer potency to account for the increased sensitivity of early-in-life exposure to carcinogens. The Technical Support Document for Exposure Assessment and Stochastic Analysis (June 2012) presents the exposure model for the Hot Spots program and reviews the available literature on exposure and relevant fate and transport variates. All three TSDs are available on OEHHA's web site at: [http://www.oehha.ca.gov/air/hot\\_spots/index.html](http://www.oehha.ca.gov/air/hot_spots/index.html). Excerpts of these three TSDs are presented in this document. There is relatively little new information in the Guidance Manual since the adoption of the TSDs.

The draft Guidance Manual was released for public review. Public comments were received and changes were made in response to some comments. Responses were developed to all public comments. Both the Guidance Manual and OEHHA's response to comments were then reviewed by the State's Scientific Review Panel on Toxic Air Contaminants (SRP), who previously reviewed the three TSDs upon which this guidance is based. Following review by the SRP, OEHHA finalized this Guidance Manual. This Guidance Manual supersedes the risk assessment methods presented in the *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA, 2003), which in turn replaced earlier guidance provided by the California Air Pollution Control Officer's Association (CAPCOA, 1993). This manual updates health effects values, exposure pathway variates (e.g., breathing rates), and

continues to use a tiered approach for performing HRAs based on current science and policy assessment. The Technical Support Document for Cancer Potency Factors (OEHHA, 2009) recommends a tenfold early-in-life potency factor adjustment for the third trimester and ages zero to less than two, and a threefold adjustment factor for ages two to less than sixteen. In addition, we recommend evaluating residency periods of nine, thirty and seventy years. This means that exposure variates are needed for the third trimester, ages zero to less than two, ages two to less than nine, ages two to less than 16, ages 16 to less than 30, and ages 16 to 70.

The tiered approach presented in this draft manual provides a risk assessor with flexibility and allows consideration of site-specific differences. Furthermore, risk assessors can tailor the level of effort and refinement of an HRA by using the point-estimate exposure variates or the stochastic treatment of distributions of exposure variates. The four-tiered approach to risk assessment primarily applies to residential cancer risk assessment. Compared to the OEHHA 2003 document, the exposure pathways in the Guidance Manual remain the same. The exposure and risk algorithms are similar, but they have been revised to accept new data or variables that are used in the tiered risk assessment approach.

The draft manual also contains example calculations and an outline for a modeling protocol and an HRA report. A software program, the Hot Spots Analysis and Reporting Program (HARP), has been developed by the Air Resources Board in consultation with OEHHA and Air Pollution Control/Air Quality Management District representatives. The HARP software, which is being updated with the new exposure variates and health values, is the recommended model for calculating and presenting HRA results for the Hot Spots Program. Information on obtaining the HARP software can be found on the ARB's web site at [www.arb.ca.gov](http://www.arb.ca.gov) under the Hot Spots Program.

The intent of the Guidance Manual and the HARP software is to incorporate children's health concerns, update risk assessment practices, and to provide consistent risk assessment procedures. The use of consistent risk assessment methods and report presentation has many benefits, such as expediting the preparation and review of HRAs, minimizing revision and resubmission of HRAs, allowing a format for facility comparisons, and cost-effective implementation of HRAs and the Hot Spots Program. Risk assessments prepared with this Guidance Manual may be used for permitting new or modified stationary sources, or public notification, and risk reduction requirements of the Hot Spots Program. The use of uniform procedures allows comparison of risks from different facilities and enables identification of facilities that are problematic from a public health perspective. OEHHA reviews the HRAs to insure they are adequate for decision making, but does not play a role in permitting decisions that may result from the HRAs. OEHHA will provide advice to the Districts when requested on any of the risk assessment methods or health values they have used.

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# 1 - Introduction

## 1.1 Development of Guidelines

The Air Toxics Hot Spots Information and Assessment Act is designed to provide information to state and local agencies and to the general public on the extent of airborne emissions from stationary sources and the potential public health impacts of those emissions. The Hot Spots Act requires that the Office of Environmental Health Hazard Assessment (OEHHA) develop risk assessment guidelines for the Hot Spots program (Health and Safety Code (HSC) Section 44360(b)(2)) (see Appendix B for the text of the HSC). In addition, the Hot Spots Act specifically requires OEHHA to develop a “likelihood of risks” approach to health risk assessment. In response, OEHHA developed a tiered approach to risk assessment where a point estimate approach is first employed. If a more detailed analysis is needed, OEHHA has developed a stochastic, or probabilistic, approach using exposure factor distributions that can be applied in a stochastic estimate of the exposure. A detailed presentation of the tiered approach, risk assessment algorithms, selected exposure variates (e.g., breathing rate), and distributions with a literature review is presented in the *Air Toxics Hot Spots Program Risk Assessment Guidelines; Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012). A summary of this information can be found in Chapter 5 of this document.

The Technical Support Document for the Derivation of Noncancer Reference Exposure Levels (OEHHA, 2008) addresses dose response relationships for noncancer health effects and the methodology for deriving acute, chronic and 8-hour Reference Exposure Levels (RELs). Currently there are 53 acute RELs, 82 chronic RELs, and 10 eight-hour RELs. Review and revision of RELs to take into account new information and sensitive subpopulations including infants and children is an ongoing process. All draft RELs for individual chemicals revised under the current noncancer methodology will undergo public comment and peer review, as mandated by the Hot Spots Act. The Technical Support Document for Cancer Potency Factors (OEHHA, 2009) addresses the methodology for deriving cancer potency factors and adjusting cancer potency to account for the increased sensitivity to early-in-life exposure to carcinogens. This document contains inhalation cancer potency factors and oral cancer potency factors for 142 toxicants and toxicant compound classes developed by OEHHA or developed by other authoritative bodies and endorsed by OEHHA. The OEHHA website ([www.oehha.ca.gov](http://www.oehha.ca.gov)) should be consulted for the most current adopted chronic, acute and 8-hour RELs and cancer potency factors. In addition, for a small subset of these substances that are subject to airborne deposition and hence human oral and dermal exposure, oral chronic RELs and oral cancer potency factors have been developed by OEHHA. A summary of cancer and noncancer health effects values can be found in Appendix L and Chapters 6 and 7 of the Guidance Manual. All three Technical Support Documents have undergone public and peer review and have been approved by the state’s Scientific Review Panel on Toxic Air Contaminants and adopted by OEHHA. The Guidance Manual is undergoing the same public and peer review process.

The Guidance Manual contains a description of the algorithms, recommended exposure variates, and cancer and noncancer health values, and modeling protocols needed to perform a Hot Spots risk assessment under the Hot Spots Act (see Appendix B). The information for the Guidance Manual is taken from the three TSDs. The Guidance Manual supersedes the risk assessment methods presented in the Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA, 2003).

The Guidance Manual is intended to address health risks from airborne contaminants released by stationary sources. Some of the methodology used is common to other regulatory risk assessment applications, particularly for California programs. However, if the reader needs to prepare a Health Risk Assessment (HRA) under another program, the HRA may need additional analyses. Therefore, appropriate California and federal agencies should be contacted. For example, if a facility must comply with HRA requirements under the Resource Conservation and Recovery Act (RCRA) or the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the California Department of Toxic Substances Control (DTSC) must be contacted to determine if an HRA written to comply with AB 2588 will also satisfy RCRA/CERCLA requirements.

## 1.2 Use of the Guidance Manual

The intent in developing this Guidance Manual is to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources. The Air Resources Board (ARB) website ([www.arb.ca.gov](http://www.arb.ca.gov)) provides more information on the Hot Spots Program and risk management guidelines, including recommendations for permitting existing, new, or modified stationary sources. The use of consistent risk assessment procedures and report presentation allows comparison of one facility to another, expedites the review of HRAs by reviewing agencies, and minimizes revision and resubmission of HRAs.

OEHHA recognizes that no one risk assessment procedure or set of exposure variates could perfectly address the many types of stationary facilities in diverse locations in California. Therefore a tiered risk assessment approach was developed to provide flexibility and allow consideration of site-specific differences. The tiered approach to risk assessment is discussed in detail in Chapter 8 of this Guidance.

These guidelines should be used in conjunction with the emission data collected and reported pursuant to requirements of the ARB's *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5)*, and the *Emission Inventory Criteria and Guidelines Report for the Air Toxics "Hot Spots" Program* (EICG Report), which is incorporated by reference therein (see ARB's web site: <http://www.arb.ca.gov/ab2588/2588guid.htm> for the most current version, which was approved on August 27, 2007). This regulation outlines requirements for the collection of emission data, based on an inventory plan, which must be approved by the Air Pollution Control or Air Quality Management District (District). The emissions reported under this program are routine or predictable and include continuous

and intermittent releases and predictable process upsets or leaks. Emissions for unpredictable releases (e.g., accidental catastrophic releases) are not reported under this program.

For landfill sites, these guidelines should be applied to the results of the landfill testing required under Health and Safety Code Section 41805.5 as well as to any emissions reported under the emission inventory requirements of the Air Toxics Hot Spots Act (e.g., from flares or other on-site equipment). Districts should be consulted to determine the specific landfill testing data to be used.

### **1.3 Who is Required to Conduct a Risk Assessment**

The Hot Spots Act requires that each local Air Pollution Control District or Air Quality Management District (hereinafter referred to as District) determine which facilities will prepare an HRA. As defined under the Hot Spots Act, an HRA includes a comprehensive analysis of the dispersion of hazardous substances in the environment, their potential for human exposure, and a quantitative assessment of both individual and population-wide health risks associated with those levels of exposure.

Districts are to determine which facilities will prepare an HRA based on a prioritization process outlined in the law. The process by which Districts identify priority facilities for risk assessment involves consideration of potency, toxicity, quantity of emissions, and proximity to sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. The District may also consider other factors that may contribute to an increased potential for significant risk to human receptors. As part of this process Districts categorize facilities as high, intermediate, or low priority. The District prioritization process is described in the *CAPCOA Air Toxics Hot Spots Program Facility Prioritization Guidelines, July 1990* (CAPCOA, 1990), although some Districts may have adopted their own method for prioritizing facilities for the purposes of AB2588, permitting, etc. Consult the District for updates to the Prioritization Guidelines. See the Hot Spots Program on ARB's web site at [www.arb.ca.gov](http://www.arb.ca.gov) for more information on facility prioritization procedures.

Facilities designated by a District as "high priority" are required to submit an HRA to the District within 150 days of designation. Districts may grant a 30-day extension. However, a District may require any facility to prepare and submit an HRA according to the District priorities established for purposes of the Hot Spots Act.

## 1.4 The Hot Spots Analysis and Reporting Program (HARP) Software

The ARB and the Districts have identified a critical need for software to assist with the programmatic aspects of the Hot Spots Program. HARP is computer software used by the ARB, OEHHA, Districts, and facility operators to promote statewide consistency, efficiency, and cost-effective implementation of HRAs and the Hot Spots Program. The HARP software package includes: 1) an Emissions Inventory Database Module, 2) an Air Dispersion Modeling Module, and 3) a Risk Analysis Module. The user-friendly Windows-based package provides for:

1. Electronic implementation of the risk assessment methods presented in the OEHHA guidelines (Guidance Manual);
2. Electronic data transfer from facilities and Districts;
3. The production of reports;
4. Facility prioritization;
5. Air dispersion modeling (AERMOD) of multiple emission releases or facilities for cumulative impact evaluations;
6. A summary report of acute, 8-hour, and chronic health hazard quotients or indices, and cancer risk at the point of maximum impact (PMI), maximally exposed individual resident (MEIR), maximally exposed individual worker (MEIW) and other receptors to be evaluated as needed;
7. Mapping displays of facility property boundaries, risk isopleths, and elevation contours;
8. The ability to display combined risk contours from multiple emission sources;
9. Output of data for use in other “off-the-shelf” Geographic Information Systems (GIS) programs for additional types of analysis; and
10. Census data for determining population-related health impacts showing the number of people exposed at various cancer risk levels and cancer burden.

## 1.5 Risk Assessment Review Process

The Hot Spots Act risk assessments are reviewed by the local District and by OEHHA. The Districts focus their review on the emissions data and the air dispersion modeling. OEHHA provides comments on the HRA’s general concordance with the Guidelines Manual and the completeness of the reported health risks. The District, taking into account the comments of OEHHA, approves the HRA or returns it to the facility for revision and resubmission. If the HRA is not revised and resubmitted by the facility within 60 days, the District may modify the HRA and approve it as modified. Based on the approved HRA, the District determines if there is a significant health risk associated with emissions from the facility. If the District determines that facility emissions pose a significant health risk, the facility operator provides notice to all exposed individuals regarding the results of the HRA and may be required to take steps to reduce emissions by implementing a risk reduction audit and plan. Notification is to be made according to

procedures specified by the District. Each District determines its own levels of significance for cancer and noncancer health effects for notification and risk reduction. See the Hot Spots Program on ARB's web site at [www.arb.ca.gov](http://www.arb.ca.gov) for more information on significance levels selected by each District.

## 1.6 Uncertainty in Risk Assessment

OEHHA has striven to use the best science available in developing these risk assessment guidelines. However, there is a great deal of uncertainty associated with the process of risk assessment. The uncertainty arises from lack of data in many areas necessitating the use of assumptions. The assumptions used in these guidelines are designed to err on the side of health protection in order to avoid underestimation of risk to the public. Sources of uncertainty, which may overestimate or underestimate risk, include: 1) extrapolation of toxicity data in animals to humans, 2) uncertainty in the estimation of emissions, 3) uncertainty in the air dispersion models, and 4) uncertainty in the exposure estimates. In addition to uncertainty, there is a natural range or variability in measured parameters defining the exposure scenario. Scientific studies with representative sampling and large enough sample sizes can characterize this variability. In the specific context of a Hot Spots risk assessment, the source of variability with the greatest quantitative impact is variation among the human population in such properties as height, weight, food consumption, breathing rates, and susceptibility to chemical toxicants. OEHHA captures at least some of the variability in exposure by developing data driven distributions of intake rates, where feasible, in the TSD for Exposure Assessment (OEHHA, 2012).

Interactive effects of exposure to more than one carcinogen or toxicant are addressed in the risk assessment with default assumptions of additivity. Cancer risks from all carcinogens addressed in the HRA are added. Similarly, non-cancer hazard quotients for substances impacting the same target organ/system are added to determine the hazard index (HI). Although such effects of multiple chemicals are assumed to be additive by default, several examples of synergism (interactive effects greater than additive) are known. For substances that act synergistically, the HRA could underestimate the risks. Some substances may have antagonistic effects (lessen the toxic effects produced by another substance). For substances that act antagonistically, the HRA could overestimate the risks.

Other sources of uncertainty, which may underestimate or overestimate risk, can be found in exposure estimates where little or no data are available (e.g., soil half-life and dermal penetration of some substances from a soil matrix).

The differences among species and within human populations usually cannot be easily quantified and incorporated into risk assessments. Factors including metabolism, target site sensitivity, diet, immunological responses, and genetics may influence the response to toxicants. The human population is much more diverse both genetically and culturally (e.g., lifestyle, diet) than inbred experimental animals. The intraspecies variability among humans is expected to be much greater than in laboratory animals.

In most cases, cancer potency values have been estimated only for the single most affected tumor site. This represents a source of uncertainty in the cancer risk assessment. Adjustment for tumors at multiple sites induced by some carcinogens may result in a higher potency. Some recent assessments of carcinogens include such adjustments. Other uncertainties arise 1) in the assumptions underlying the dose-response model used, and 2) in extrapolating from large experimental doses, where other toxic effects may compromise the assessment of carcinogenic potential, to usually much smaller environmental doses.

When occupational epidemiological data are used to generate a carcinogenic potency or a health protective level for a non-carcinogen, less uncertainty is involved in the extrapolation from workplace exposures to environmental exposures. When using human data, no interspecies extrapolation is necessary eliminating a significant source of uncertainty. However, children are a subpopulation with hematological, nervous, endocrine, and immune systems that are still developing and may be more sensitive to the effects of toxicants. The worker population and risk estimates based on occupational epidemiological data are more uncertain for children than adults. Current risk assessment guidelines include procedures designed to address the possibly greater sensitivity of infants and children, but there are only a few compounds for which these effects have actually been measured experimentally. In most cases, the adjustment relies on default assumptions which may either underestimate or overestimate the true risks faced by infants and children exposed to toxic substances or carcinogens.

Risk estimates generated by an HRA should not be interpreted as the expected rates of disease in the exposed population but rather as estimates of potential for disease, based on current knowledge and a number of assumptions.

In the Hot Spots program, cancer risk is often expressed as the maximum number of new cases of cancer projected to occur in a population of one million people due to exposure to the cancer-causing substance over a 30-year residential period. However, there is uncertainty associated with the cancer risk estimate. An individual's risk of contracting cancer from exposure to facility emissions may be less or more than the risk calculated in the risk assessment. An individual's risk not only depends on the individual's exposure to a specific chemical but also on his or her genetic background, health, diet, lifestyle choices and other environmental and workplace exposures. OEHHA uses health-protective exposure assumptions to avoid underestimating risk. For example, the risk estimate for airborne exposure to chemical emissions uses the health-protective assumption that the individual has a high breathing rate and exposure began early in life when cancer risk is highest.

A Reference Exposure Level (REL) is the concentration level at or below which no adverse non-cancer health effects are anticipated for the specified exposure duration. RELs are based on the most sensitive, relevant, adverse health effect reported in the medical and toxicological literature. RELs are designed to protect the most sensitive individuals in the population by the inclusion of factors that account for uncertainties as well as individual differences in human susceptibility to chemical exposures. The factors used in the calculation of RELs are meant to err on the side of public health

protection in order to avoid underestimation of non-cancer hazards. Exceeding the REL does not automatically indicate an adverse health impact. However, increasing concentrations above the REL value increases the likelihood that the health effect will occur.

Risk assessments under the Hot Spots program are often used to compare one source with another and to prioritize concerns. Consistent approaches to risk assessment are necessary to fulfill this function.

### 1.7 Tiered Approach to Risk Assessment

OEHHA developed a tiered approach to accommodate consideration of site-specific data that may be more appropriate for a given facility than the default variate. The first tier is the simplest point estimate approach to estimating exposure to facility emissions. Tier 1 is the first step in conducting a comprehensive risk assessment using algorithms and point estimates of input values described in the *Technical Support Document for Exposure Assessment and Stochastic Analysis*. (OEHHA, 2012) Each facility conducts a Tier 1 risk assessment to promote consistency across the state in facility risk assessments and facilitate comparisons across facilities. To be health-protective, high-end estimates for the key intake exposure variates are used for the dominant exposure pathways.

Tier 2 allows use of site-specific point estimates of exposure variates as long as these estimates can be justified. For example, if there are data indicating that consumption of fish from an impacted body of water is lower than the OEHHA-recommended fish consumption rate, then the facility can use that data to generate a point estimate for sport-fish consumption from that body of water. The risk assessor must supply the data and methods used for the site-specific estimates, and the site-specific estimates must be reproducible and approved by both the District and OEHHA.

Tier 3 risk assessment involves stochastic analysis of exposure using data-based distributions for the key exposure variates compiled in the OEHHA (2012) *Technical Support Document*. Since a stochastic approach to risk assessment provides more information about the range of risk estimates based on the range of exposures, Tier 3 can serve as a useful supplement to the Tier 1 and 2 approaches. Variance propagation methods (e.g., Monte Carlo analysis) are used to derive a range of cancer risk estimates reflecting the known variability in the inputs. Finally, a Tier 4 approach would use distributions of exposure variates that may be more appropriate for a site, such as the distribution of fish consumption rates for a specific body of water impacted by a facility. As in a Tier 2 approach, the risk assessment must supply the data and methods used for the site-specific distributions for exposure variates, and the site-specific estimates must be justified to and reproducible by the Districts and OEHHA.

### 1.8 References

CAPCOA, 1990. *CAPCOA Air Toxics Hot Spots Program Facility Prioritization Guidelines*. California Air Pollution Control Officers Association, July 1990.

OEHHA, 2003. Air Toxics Hot Spots Risk Assessment Guidelines: The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments.

OEHHA, 2008. Air Toxics Hot Spots Risk Assessment Guidelines Technical Support Document for the Derivation of Noncancer Reference Exposure Levels. Available online at: <http://www.oehha.ca.gov>

OEHHA, 2009. Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures. May 2009. Available online at: <http://www.oehha.ca.gov>

OEHHA, 2012. Air Toxics Hot Spots Program Risk Assessment Guidelines; Technical Support Document for Exposure Assessment and Stochastic Analysis. Available online at <http://www.oehha.ca.gov>

## 2 - Overview of Health Risk Assessment

### 2.1 The Model for Risk Assessment

The standard approach currently used for health risk assessment (HRA) was originally proposed by the National Academy of Sciences in the 1983 book: *Risk Assessment in the Federal Government: Managing the Process* (NAS, 1983) and was updated in the Academy's 1994 book: *Science and Judgment in Risk Assessment* (NAS, 1994). In 2009 the National Academy published *Science and Decisions: Advancing Risk Assessment* (NAS, 2009), in which a number of recommendations are made on improving the risk assessment process and expanding it to include community concerns and cumulative risks. The four steps involved in the risk assessment process are 1) hazard identification, 2) exposure assessment, 3) dose-response assessment, and 4) risk characterization. These four steps are briefly discussed below.

### 2.2 Hazard Identification

For air toxics sources, hazard identification involves the pollutant(s) of concern emitted by a facility, and the types of adverse health effects associated with exposure to the chemical(s), including whether a pollutant is a potential human carcinogen or is associated with other types of adverse health effects. For the Air Toxics Hot Spots Program (Hot Spots), the emitted substances that are addressed in a risk assessment are found in the list of substances designated in the ARB's *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5)*, and the *Emission Inventory Criteria and Guidelines Report* (EICG Report), which is incorporated by reference therein (ARB, 2007). This list of substances is contained in Appendix A of this document and the EICG Report. The list of substances also identifies those substances that are considered human carcinogens or potential human carcinogens.

### 2.3 Exposure Assessment

The purpose of the exposure assessment is to estimate the extent of public exposure to emitted substances. For the Hot spots program, in practice this means estimating exposures for those emitted substances for which potential cancer risk or noncancer health hazards for acute, repeated 8-hour, and chronic exposures will be evaluated. This involves emission quantification, modeling of environmental transport, evaluation of environmental fate, identification of exposure routes, identification of exposed populations, and estimation of short-term (e.g., 1-hour maximum), 8-hour average, and long-term (annual) exposure levels. These activities are described in Chapters 4 and 5. Chapter 5 also discusses the tiered approach to risk assessment.

The ARB's Emission Inventory Criteria and Guidelines (EICG) Report provides assistance in determining those substances that must be evaluated in an HRA and the reporting requirements of facilities, while the Hot Spots Analysis and Reporting Program (HARP) software can be used to model ground level concentrations at specific off-site

locations resulting from facility emissions. The United States Environmental Protection Agency (U.S. EPA) has adopted the AERMOD air dispersion model into its list of regulatory approved models, in place of the previously used ISCST3 model. AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain (U.S. EPA, 2009). The Air Resources Board recommends AERMOD for Hot Spots risk assessments. The AERMOD air modeling software will be incorporated into the HARP software, which allows the user to input all dispersion parameters directly into the program to generate air dispersion data. Alternatively, the air dispersion data may be generated separately from HARP using other air dispersion models, and then imported into HARP to generate risk estimates. Data imported into HARP must already be in the format required by HARP. HARP has the flexibility to generate a summary of the risk data necessary for an HRA by either of the above approaches.

Most of the toxicants assessed under the Hot Spots program are volatile organic compounds that remain as gases when emitted into the air. These chemicals are not subject to appreciable deposition to soil, surface waters, or plants. Therefore, human exposure via ingestion or dermal exposure, at least at concentrations typically encountered in the ambient air, is not considered for volatile organic compounds in the Hot Spots risk assessments. While some models indicate potential for dermal exposure to certain volatile organic compounds, at this time, the Hot spots program does not consider this pathway. Significant exposure to volatile organic toxicants emitted into the air occurs through the inhalation pathway, and this pathway is the primary consideration in the Hot Spots risk assessments. A small subset of Hot Spots substances consists of semi-volatile organic and metal toxicants emitted partially or totally as particles subject to deposition. Ingestion and dermal pathways as well as the inhalation pathway must be evaluated for these chemicals. A few of these semi-volatile organic and metal toxicants must also include the breast milk ingestion pathway. Additional ingestion pathways may also need to be evaluated depending on the pathways of exposure for the specific receptor of interest. Table 5.1 in Chapter 5, Table 6.4 in Chapter 6, and Table 7.1 in Chapter 7 list the substances that must be evaluated for multipathway impacts. HARP is designed to assess potential health impacts posed by substances that must be analyzed by a multipathway approach.

## 2.4 Dose-Response Assessment

Dose-response assessment is the process of characterizing the relationship between exposure to an agent and incidence of an adverse health effect in exposed populations. In quantitative carcinogenic risk assessment, the dose-response relationship is expressed in terms of a potency slope that is used to calculate the probability or risk of cancer associated with an estimated exposure. Cancer potency factors are expressed as the 95<sup>th</sup> percent upper confidence limit of the slope of the dose response curve estimated assuming continuous lifetime exposure to a substance. Typically, potency factors are expressed as units of inverse dose (e.g., (mg/kg BW/day)<sup>-1</sup>) or inverse concentration (e.g., (µg/m<sup>3</sup>)<sup>-1</sup>). It is assumed in cancer risk assessments that risk is directly proportional to dose and that there is no threshold for carcinogenesis.

The Office of Environmental Health Hazard Assessment (OEHHA) has compiled cancer potency factors, which should be used in risk assessments for the Hot Spots program, in Table 7.1. Cancer potency factors listed in Table 7.1 were derived either by the U.S. EPA or by OEHHA, underwent public and peer-review, and were adopted for use in the program. Chapter 8 describes procedures for use of potency values in estimating excess cancer risk. For a detailed description of cancer potency factors, refer to the *Technical Support Document for Cancer Potency Factors* (OEHHA, 2009).

For noncarcinogenic effects, dose-response data developed from animal or human studies are used to develop acute, 8-hour, and chronic noncancer Reference Exposure Levels (RELs). The acute, 8-hour and chronic RELs are defined as the concentration at which no adverse noncancer health effects are anticipated even in sensitive members of the general population, with infrequent one hour exposures, repeated 8-hour exposures over a significant fraction of a lifetime, or continuous exposure over a significant fraction of a lifetime, respectively. The most sensitive health effect is chosen to develop the REL if the chemical affects multiple organ systems. Unlike cancer health effects, noncancer health effects are generally assumed to have thresholds for adverse effects. In other words, injury from a pollutant will not occur until exposure to that pollutant has reached or exceeded a certain concentration (i.e., threshold) and/or dose. The acute, 8-hour, and chronic RELs are air concentrations intended to be below the threshold for health effects for the general population.

The actual threshold for health effects in the general population is generally not known with any precision. Uncertainty factors are applied to the Lowest Observed Adverse Effects Level (LOAEL) or No Observed Adverse Effects Level (NOAEL) or Benchmark Concentration values from animal or human studies to help ensure that the chronic, 8-hour and acute REL values are below the threshold for human health for nearly all individuals. This guidance manual provides the acute, 8-hour, and chronic Reference Exposure Levels in Tables 6.1 through 6.3. Some substances that pose a chronic or repeated 8-hour inhalation hazard may also present a chronic hazard via non-inhalation routes of exposure (e.g., ingestion of contaminated water, foods, or soils, and dermal absorption). The oral RELs for these substances are presented in Table 6.4. The methodology and derivations for acute, 8-hour, and chronic, RELs are described in the *Technical Support Document for the Derivation of Noncancer Reference Exposure Levels* (OEHHA, 2008).

## **2.5 Risk Characterization**

This is the final step of risk assessment. In this step, modeled concentrations and exposure information, which are determined through exposure assessment, are combined with potency factors and RELs that are developed through dose-response assessment. The use of cancer potency factors to assess total cancer risk and the use of the hazard index approach for evaluating the potential for noncarcinogenic health effects are described in Chapter 8. Example calculations for determining (inhalation) cancer risk and noncancer acute, 8-hour, and chronic hazard quotients and hazard indices are presented in Appendix I. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

Under the Hot Spots Act, health risk assessments are to quantify both individual and population-wide health impacts (Health and Safety Code, Section 44306) (Appendix B). The health risk assessments are facility specific and the calculated risk should be combined for all pollutants emitted by a single facility. For example, cancer risk from multiple carcinogens is considered additive. For exposures to multiple non-carcinogen pollutants, a hazard index approach is applied for air contaminants affecting the same organ system. All substances emitted by the facility that are on the Hot Spots Act list of substances must be identified in the HRA, including those on the list that do not have a potency value or REL.

For assessing risk, OEHHA has developed two methods for determining dose via inhalation, dermal absorption, and ingestion pathways. These two methods, the point estimate approach and the stochastic exposure assessment approach, are described below and in Chapters 5 and 8. Detailed presentations of these methods can be found in: *Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012).

### **2.5.1 Point Estimate Approach**

OEHHA provides information in this document on average and high-end values for key exposure pathways (e.g., breathing rate for the inhalation exposure pathway). The average and high-end of point estimates in this document are defined in terms of the probability distribution of values for that variate. The mean represents the average values for point estimates and the 95<sup>th</sup> percentiles represent the high-end point estimates from the distributions identified in OEHHA (2012). Thus, within the limitations of the data, average and high-end point estimates are supported by the distribution.

Tier 1 of the tiered approach to risk assessment, which is briefly discussed in Section 2.5.3 and presented in more detail in Chapter 8, utilizes a combination of the average and high-end point estimates to more realistically estimate exposure in multipathway risk assessments. This method uses high-end exposure estimates for the pathways that are the main drivers of exposure and the average point estimate for the other non-driving exposure pathways. This approach will lessen the issue of compounding high-end exposure estimates, while retaining a health-protective approach for the more important exposure pathways. It is unlikely that an individual receptor would be on the high-end of exposure for all exposure pathways. See Chapter 8 for detailed discussions of how this multipathway methodology is applied to cancer and noncancer calculations. The HARP software can perform this analysis (referred to as the derived approach in the HARP software).

In addition to using an estimate of average and high-end consumption rates, cancer risk evaluations at individual receptors are presented for 9, 30, and 70-year exposure durations. The 9 and 30-year durations correspond to the average and high-end of residency time recommended by U.S. EPA (1997). The California data presented in Appendix L of the Exposure TSD (OEHHA, 2012) are generally supportive of the nationwide data. The 9 and 70-year exposure durations present potential impacts over the range of residency periods, while the 30-year exposure duration is recommended

for use as the basis for estimating cancer risk at the MEIR in all HRAs. Population-wide impacts should use the 70-year exposure duration.

The parameters used for all exposure durations assume exposure begins in the last trimester of pregnancy and progresses through the exposure duration of interest (e.g., 9, 30, or 70 years). These assumptions are thus protective of children. Children have higher intake rates on a per kilogram body weight basis (e.g., they breathe, drink and eat more per kg body weight than adults) and thus receive a higher dose from contaminated media. See Chapter 5 for the point estimates that can be used to estimate impacts for children. Chapters 5 and 8 discuss how to calculate cancer risk based on various exposure durations and point estimates. Appendix I contains an example calculation and Chapter 9 clarifies how to present the findings in an HRA.

### **2.5.2 Stochastic Exposure Assessment**

OEHHA was directed under the Air Toxics “Hot Spots” program (SB 1731, Calderon, stat. 1992; Health and Safety Code Section 44360(b)(2)) to develop a “likelihood of risk” approach to risk assessment. To satisfy this requirement, OEHHA developed a stochastic approach to risk assessment that utilizes distributions for exposure variates such as breathing rate and water consumption rate rather than a single point estimate. The variability in exposure can be propagated through the risk assessment model using the distributions as input and a Monte Carlo or similar method. The result of such an analysis is a range of risks that at least partially characterizes variability in exposure.

Distributions of key exposure variates that are presented in the *Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012) were taken from the literature, if adequate, or developed from raw data of original studies. Intake variates such as vegetable consumption are relatively data rich; for these variates reasonable probability distributions can be constructed. However, the data necessary to characterize the variability in risk assessment variates are not always available. For example, for the fate and transport variates (e.g., fish bioaccumulation factors), there are only a few measurements for a given chemical available which precludes the adequate characterization of a probability distribution. We only developed distributions for those key exposure variates that were adequately characterized by data. Development of distributions is described in detail in the *Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012).

### 2.5.3 Tiered Approach to Risk Assessment

OEHHA recommends using a tiered approach to risk assessment. Tier 1 is a standard point estimate approach using the recommended point estimates presented in this document. If site-specific information is available to modify some point estimates developed in the *Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012) and is more appropriate to use than the recommended point estimates in this document, then Tier 2 allows use of that site-specific information. Site-specific information should be presented to the District before being used. The District may contact OEHHA for additional advice. Note that all non-default variates need to be adequately justified to OEHHA and the Districts to be used. In Tier 3, a stochastic approach to exposure assessment is used with the data distributions developed in the TSD (OEHHA, 2012) and presented in this document. Tier 4 is also a stochastic approach but allows for utilization of site-specific distributions, if they are justifiable (to OEHHA and the Districts) and more appropriate for the site under evaluation than those recommended in this document. Persons preparing an HRA that has a Tier 2 through Tier 4 evaluation must also include the results of a Tier 1 evaluation. Tier 1 evaluations are required for all HRAs prepared for the Hot Spots Program to promote consistency across the state for all facility risk assessments and allow comparisons across facilities. Chapter 8 provides a summary of the tiered approach and the TSD (OEHHA, 2012) discusses it in detail. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

## 2.6 References

ARB, 2007. *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5), and the Emission Inventory Criteria and Guidelines Report* (EICG Report).

NAS, 1983. National Academy of Sciences. *Risk Assessment in the Federal Government: Managing the Process*. National Research Council. National Academy Press, Washington D.C.

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## 3 - Hazard Identification - Air Toxics Hot Spots Emissions

### 3.1 The Air Toxics Hot Spots List of Substances and Emissions Inventory

For air toxics sources, hazard identification involves identifying pollutants of concern and whether these pollutants are potential human carcinogens or associated with other types of adverse health effects. For the Air Toxics Hot Spots (Hot Spots) Program, the emitted substances that are addressed in a health risk assessment (HRA) are found in the list of hazardous substances designated in the Air Resources Board's (ARB's) *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5)*, and the *Emission Inventory Criteria and Guidelines Report (EICG Report)*, which is incorporated by reference therein (ARB, 2007). This list of substances is contained in both Appendix A of this document and the EICG Report. The list of substances also identifies those substances that are considered human carcinogens or potential human carcinogens.

The substances included on the Hot Spots Program list of substances are defined in the statute as those substances found on lists developed by the following sources:

- International Agency for Research on Cancer (IARC);
- U.S. Environmental Protection Agency (U.S. EPA);
- U.S. National Toxicology Program (NTP);
- ARB Toxic Air Contaminant Identification Program List;
- Hazard Evaluation System and Information Service (HESIS) (State of California);
- Proposition 65 (Safe Drinking Water and Toxic Enforcement Act of 1986) list of carcinogens and reproductive toxicants (State of California);
- Any additional substance recognized by the State Board as presenting a chronic or acute threat to public health when present in the ambient air.

All substances emitted by the facility that are on the Hot Spots Act list of substances must be identified in the HRA.

The ARB EICG Report (ARB, 2007) specifies that each facility subject to the Hot Spots Act must submit an Emission Inventory Report to the local air pollution control or air quality management district. This Emission Inventory Report must identify and account for all listed substances used, manufactured, formulated, or released by the facility. All routine, predictable releases must be reported. These inventory reports include the emission data necessary to estimate off-site levels of facility-released Hot Spots substances. These inventory reports will be discussed in further detail in Chapter 4. See Chapter 9 for an outline that specifies the content and recommended format for presenting the air dispersion modeling and HRA results. As presented in Appendix A, the EICG Report divides the list into three groups for reporting purposes. Potency or severity of toxic effects and potential for facility emission were considered in placing compounds into the three groups.

For the first group (listed in these guidelines in Appendix A-I), all emissions of these substances must be quantified in the HRA. For substances in the second group (listed in these guidelines in Appendix A-II), emissions are not quantified; however, facilities must report whether the substance is used, produced, or otherwise present on-site (i.e., these substances are simply listed in a table in the HRA). Lastly, substances in the third group (Appendix A-III) also only need to be reported in a table in the HRA if they are manufactured by the reporting facility.

Facilities that must comply with the Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation and Liability Act (RCRA/CERCLA) requirements for risk assessment need to consult the California Department of Toxic Substances Control (DTSC) Remedial Project Manager to determine which substances must be evaluated in their risk assessment. Some RCRA/CERCLA facilities may emit substances which are not currently listed under the Hot Spots Program but which may require evaluation in a RCRA/CERCLA risk assessment.

### **3.2 References**

ARB, 2007. *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5), and the Emission Inventory Criteria and Guidelines Report (EICG Report).*

## 4 - Air Dispersion Modeling

The information contained in this section is primarily an abbreviated version of the material found in Chapter 2 of the Air Toxics Hot Spots Risk Assessment Guidelines; Exposure Assessment and Stochastic Analysis Technical Support Document (OEHHA, 2012). Several references have been included in this section to indicate those areas that are covered in more detail in Chapter 2 of the Technical Support Document. However, some air dispersion concepts and procedures have been added to assist the reader in the health risk assessment (HRA) process. In particular, a brief summary of the Hot Spots Analysis and Reporting Program (HARP) software applicability to air dispersion analysis has been included. The HARP software has been developed by the Air Resources Board (ARB), in consultation with OEHHA and Air Pollution Control or Air Quality Management District (District) representatives. The HARP software is the recommended model for calculating and presenting HRA results for the Air Toxics Hot Spots Program (Hot Spots). Information on obtaining the HARP software can be found under the Hot Spots Program on the ARB's web site at [www.arb.ca.gov](http://www.arb.ca.gov). See Chapter 9 for an outline that specifies the content and recommended format for presenting the air dispersion modeling and HRA results.

The U.S. EPA has adopted the AERMOD air dispersion model into their list of regulatory approved models, in place of the previously used ISCST3 model. AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain (U.S. EPA, 2009). The Air Resources Board recommends AERMOD for Hot Spots risk assessments.

### 4.1 Air Dispersion Modeling in Exposure Assessment: Overview

Estimates of air concentrations of emitted toxicants in the surrounding community from a facility's air emissions are needed in order to determine cancer and noncancer risks. One approach to determining the concentration of air pollutants emitted from the facility is to do air monitoring in the surrounding community. However, there are a number of disadvantages to this approach. Ambient air monitoring is costly because good estimates of an annual average concentration typically require monitoring at least one day in six over a year. Because it is costly, monitoring is usually limited to a select number of pollutants, and a limited number of sites. There can be significant risks from some chemicals at or even below the monitoring detection limit, which can add considerable uncertainty to risk estimates if many of the measurements are below or near the detection limit. Monitoring measures not only facility emissions but also general ambient background as well. It can be difficult and expensive to distinguish between the two using monitoring, particularly if general ambient background levels are high relative to the contribution of facility emissions. These limitations often make it impractical to use monitoring in a program such as the Air Toxics Hot Spots program with hundreds of facilities.

Air dispersion models have several advantages over monitoring. Modeling can provide greater spatial detail and the costs are relatively cheap by comparison. For example, dispersion models can estimate the pollutant concentration in air at many receptor locations (hundreds to thousands) and for a multitude of averaging periods. Air dispersion models have been validated using air monitoring.

There are, however, uncertainties associated with the typical usage of air dispersion modeling. The use of meteorological data from the nearest airport may not ideally be the best representation of localized conditions. Gaussian plume air dispersion models ignore calm hours. This can bias model predictions towards underestimation. Some dispersion models offer limited chemical reactions within the algorithms; however, we generally assume the pollutant is inert for the near-field atmospheric travel time. This may bias estimated concentrations towards over-prediction for those pollutants that are highly reactive in the atmosphere. Air dispersion model results are only as good as the emissions estimates and emissions estimates can be uncertain. However, on the whole, the advantages of air dispersion modeling for a program like the Air Toxics Hot Spots far outweigh the disadvantages.

Professional judgment is required throughout the dispersion modeling process. The local air quality district has final authority on modeling protocols. The following guidance is intended to assist in the understanding of dispersion modeling for risk assessments.

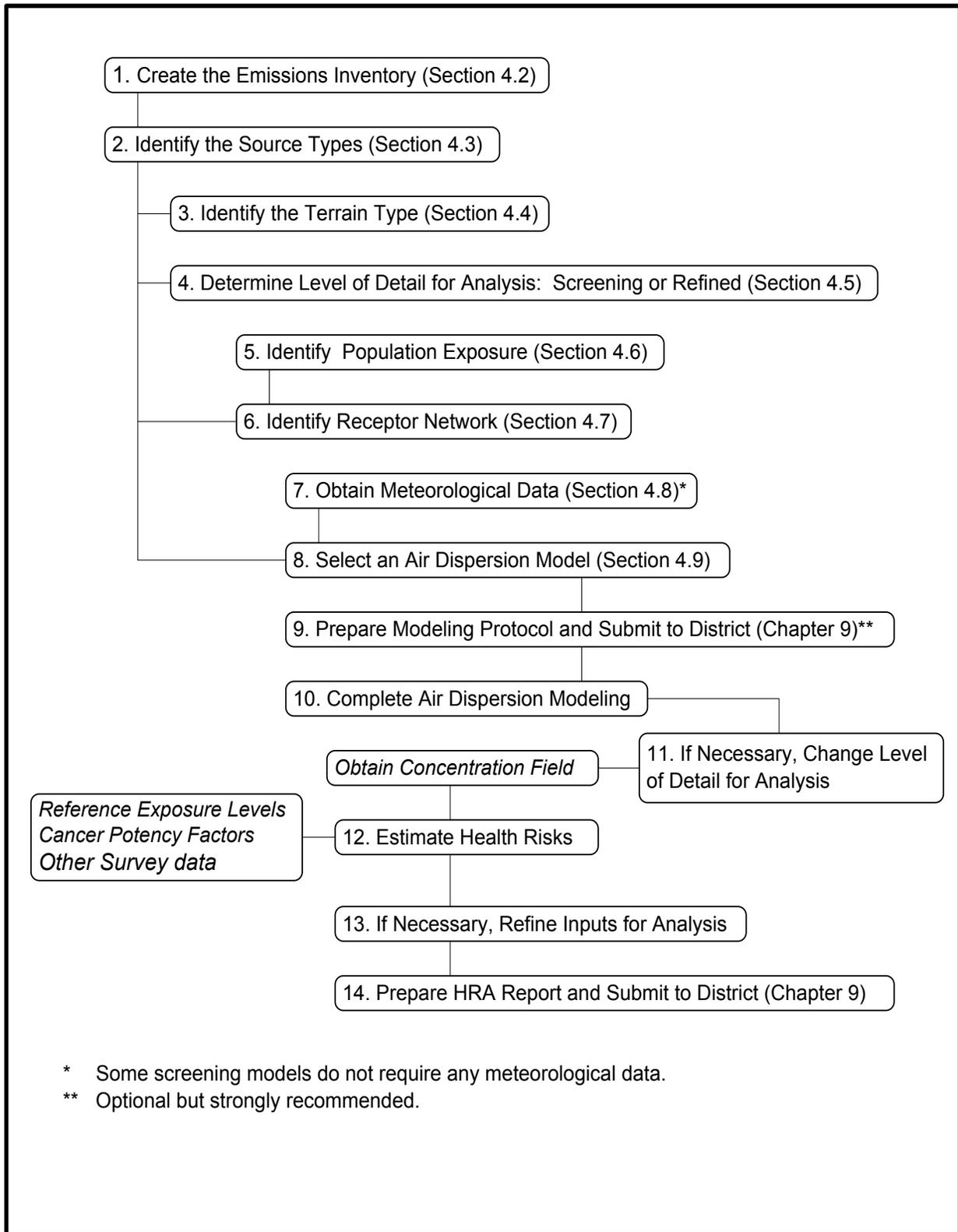
Air dispersion modeling includes the following steps (see Figure 1):

1. Create an emission inventory of the toxic releases (Section 4.2)
2. Identify the source types (Section 4.3)
3. Identify the terrain type and land use (Section 4.4)
4. Determine the detail needed for the analysis: screening or refined (Section 4.5)
5. Identify the population exposure (Section 4.6)
6. Identify the receptor network (Section 4.7)
7. Obtain meteorological data (for refined air dispersion modeling only) (Section 4.8)
8. Select an air dispersion model (Section 4.9)
9. Prepare a modeling protocol and submit to the local Air District (hereafter referred to as "the District") (Section 4.14)
10. Complete the air dispersion analysis
11. If necessary, redefine the receptor network and return to Step 10

12. Complete the risk assessment
13. If necessary, refine the inputs and/or the model selection and return to Step 8
14. Present the HRA results (Chapter 9 provides an outline that specifies the content and recommended format of HRA results).

The output of the air dispersion modeling analysis includes a receptor field of ground level concentrations of the pollutant in ambient air. These concentrations can be used to estimate an inhaled or ingested dose for the estimation of multipathway cancer risk, or used to determine a hazard index for acute (inhalation), and chronic noncancer multipathway risks. It should be noted that in the Air Toxics “Hot Spots” program, facilities simulate the dispersion of the chemical emitted as an inert compound, and do not model any atmospheric transformations or dispersion of products from such reactions. The U.S. EPA Guideline on Air Quality Models (U.S. EPA, 2005) should be consulted when evaluating reactive pollutants for other regulatory purposes.

**Figure 1 Overview of the Air Dispersion Modeling Process.**



## 4.2 Emission Inventories

The Emission Inventory Reports (Inventory Reports) developed under the Hot Spots Program provide data to be used in the HRA and in the air dispersion modeling process. The Inventory Reports contain information regarding emission sources, emitted substances, emission rates, emission factors, process rates, and release parameters (area and volume sources may require additional release data beyond that generally available in Emissions Inventory reports). This information is developed according to the ARB's *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5)*, and the *Emission Inventory Criteria and Guidelines Report (EICG Report)*, which is incorporated by reference therein (ARB, 2007).

Updated emission data for process changes, emission factor changes, material/fuel changes, or shutdown must be approved by the District prior to the submittal of the health risk assessment (HRA). Ideally, the District review of updated emissions could be completed within the modeling protocol. In addition, it must be stated clearly in the risk assessment if the emission estimates are based on updated or revised emissions (e.g., emission reductions). This section summarizes the requirements that apply to the emission data which are used for Air Toxics "Hot Spots" Act risk assessments.

### 4.2.1 Air Toxics Hot Spots Emissions

As noted in Chapter 3, Hazard Identification, the HRA should identify all substances emitted by the facility, which are on the Hot Spots Act list of substances (see Appendix A of the Guidance Manual or the EICG Report). The EICG Report specifies that Inventory Reports must identify and account for all listed substances used, manufactured, formulated, or released by the facility. All routine, predictable releases must be reported. Under the regulations, the list is divided into three groups for reporting purposes. The first group (listed in Appendix A-I of the Inventory Guidelines Report) has all pollutants whose emissions must be quantified. The second group (listed in Appendix A-II of the Inventory Guidelines Report) includes substances where emissions do not need to be quantified; however, facilities must report whether the substance is used, produced, or otherwise present on-site. The third group (listed in Appendix A-III of the Emissions Inventory Guidelines Report) includes substances whose emissions need not be reported unless the substance is manufactured by the facility. Chemicals or substances in the second and third groups should be listed in a table in the risk assessment.

Facilities that must comply with the Resource Conservation and Recovery Act and Comprehensive Environmental Response, Compensation and Liability Act (RCRA/CERCLA) requirements for risk assessment need to consult the Department of Toxic Substances Control (DTSC) Remedial Project Manager to determine which substances must be evaluated in their risk assessment in addition to the list of "Hot Spots" chemicals. Some RCRA/CERCLA facilities may emit chemicals that are not currently listed under the "Hot Spots" Program. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

#### 4.2.1.1 Emission Estimates Used in the Risk Assessment

The HRA must include emission estimates for all substances that are required to be quantified in the facility's emission inventory report. Specifically, HRAs should include both annual average emissions and maximum 1-hour emissions for each pollutant. Maximum 1-hour emissions are used for acute noncancer health impacts while annual emissions are used for chronic exposures (i.e., chronic and 8-hour noncancer health impacts or cancer risk assessment).

Emissions for each substance must be reported for individual emitting processes associated with unique devices within a facility. Total facility emissions for an individual air contaminant will be the sum of emissions, reported by process, for that facility. Information on daily and annual hours of operation, and relative monthly activity, must be reported for each emitting process. Devices and emitting processes must be clearly identified and described and must be consistent with those reported in the emissions inventory report.

The HRA should include tables that present the emission information (i.e., emission rates for each substance released from each process) in a clear and concise manner. The District may allow the facility operator to base the HRA on more current emission estimates than those presented in the previously submitted emission inventory report (i.e., actual enforceable emission reductions realized by the time the HRA is submitted to the District). If the District allows the use of more current emission estimates, the District must review and approve the new emissions estimates prior to use in the HRA. The HRA report must clearly state what emissions are being used and when any reductions became effective. Specifically, a table presenting emission estimates included in the previously submitted emission inventory report as well as those used for the HRA should be presented. The District should be consulted concerning the specific format for presenting the emission information. Chapter 9 provides an outline that specifies the content and recommended format of HRA results. A revised emission inventory report must be submitted to the District prior to submitting the HRA and forwarded by the District to the ARB, if revised emission data are used.

##### 4.2.1.1.1 *Molecular Weight Adjustments for the Emissions of Metal Compounds*

For most of the Hot Spots toxic metals, the OEHHA cancer potency factors, acute and chronic RELs apply to the weight of the toxic metal atom contained in the overall compound. Some of the Hot Spots compounds contain various elements along with the toxic metal atom (e.g., "Nickel hydroxide", CAS number 12054-48-7, has a formula of  $H_2NiO_2$ ). Therefore, an adjustment to the reported pounds of the overall compound is needed before applying the OEHHA cancer potency factor for "Nickel and compounds" to such a compound. This ensures that the cancer potency factor, acute or chronic REL is applied only to the fraction of the overall weight of the emissions that are associated with health effects of the metal. In other cases, the Hot Spots metals are already reported as the metal atom equivalent (e.g., CAS 7440-02-0, "Nickel"), and these cases do not use any further molecular weight adjustment. (Refer to Note [7] in Appendix A,

List of Substances in the EICG Report for further information on how the emissions of various Hot Spots metal compounds are reported.)

The appropriate molecular weight adjustment factors (MWF) to be used along with the OEHHA cancer potency factors, acute and chronic RELs for Hot Spots metals can be found in the MWF column<sup>1</sup> of the table containing OEHHA/ARB Approved Health Values for use in Hot Spots Facility Risk Assessments that is in Appendix L of this document.

As an example, the compound “Nickel hydroxide” has a molecular formula of  $H_2NiO_2$ . The atomic weight of each of the elements in this compound, and the fraction they represent of the total weight, are therefore as follows:

<u>Element</u>	<u>Number of atoms</u>	<u>Atomic Weight</u>	<u>Fraction of Total Weight = MWF</u>
1 x Nickel (Ni)	1 x	58.70	$58.70 / 92.714 = \mathbf{0.6332}$ (MWF for Nickel)
2 x Oxygen (O)	2 x	15.999	
2 x Hydrogen (H)	2 x	1.008	
Total Molecular Weight of $H_2NiO_2$ :		92.714	

So, for example, assume that 100 pounds of “Nickel hydroxide” emissions are reported under CAS number 12054-48-7. To get the Nickel atom equivalent of these emissions, multiply by the listed MWF (0.6332) for Nickel hydroxide:

- 100 pounds x 0.6332 = 63.32 pounds of Nickel atom equivalent.

This step should be completed prior to applying the OEHHA cancer potency factor for “Nickel and compounds” in a calculation for a prioritization score or risk assessment calculation. (Note - The HARP software automatically applies the appropriate MWF for each Hot Spots chemical (by CAS number), so the emissions should not be manually adjusted when using HARP. Therefore, if using HARP, you would use 100 pounds for Nickel hydroxide and HARP will make the MWF adjustment for you. If not using HARP, you would use 63.32 pounds.)

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<sup>1</sup> The value listed in the MWF column for Asbestos is not a molecular weight adjustment. This is a conversion factor for adjusting mass and fibers or structures. See Appendix C for more information on Asbestos reporting and risk assessment information or see the EICG report for reporting guidance.

#### 4.2.1.2 Release Parameters

Emission release parameters (e.g., stack height and inside diameter, stack gas exit velocity, release temperature and emission source location in UTM coordinates) are needed as inputs to the air dispersion model. The Inventory Guidelines specify the release parameters that must be reported for each stack, vent, ducted building, exhaust site, or other site of exhaust release. Additional information may be required to characterize releases from non-stack (volume and area) sources; see U.S. EPA dispersion modeling guidelines or specific user's manuals. This information should also be included in the air dispersion section of the risk assessment. This information must be presented in tables included in the risk assessment. Note that some dimensional units needed for the dispersion model may require conversion from the units reported in the Inventory Report (e.g., Kelvin (K) vs. degrees Fahrenheit (°F)). Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

#### 4.2.1.3 Operation Schedule

The HRA should include a discussion of the facility operation schedule and daily emission patterns. For AB2588 purposes, emissions should be reported based on routine and predictable operations. Weekly or seasonal emission patterns may vary and should be discussed. This is especially important in a refined HRA. Diurnal emission patterns should be simulated in the air dispersion model because of diurnal nature of meteorological observations. Diurnal evaluations are important to include since diurnal weather patterns and emission releases may cause significant differences in the concentration at a receptor of interest.

A table should be included listing the emission schedule on an hourly and yearly basis. In addition, the emission schedule and exposure schedule should corroborate any exposure adjustment factors used for approximating an inhaled dose. For more information about exposure adjustment factors, see Section 4.8.1. Alternatively, exposure adjustments can be made through refining the air dispersion analysis. See Section 4.11.1.2(h) for special case modeling or Appendix M. An alternative to including modeling that addresses diurnal influences would be to include a sensitivity study showing, and/or text explaining, the reason(s) why there are no significant differences due to diurnal influences on the emissions from the facility or at the receptor(s) of interest. For more guidance, you can contact the district or reviewing authority. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

#### 4.2.1.4 Emission Controls

The HRA should include a description of control equipment, the emitting processes it serves, and its efficiency in reducing emissions of substances on the Air Toxics "Hot Spots" list. The EICG Report requires that this information be included in the Inventory Reports, along with the emission data for each emitting process. If the control equipment did not operate full-time throughout the year, then the reported overall control efficiency must be adjusted to account for any predictable downtime of the

control equipment. Any entrainment of toxic substances to the atmosphere from control equipment should be accounted for; this includes fugitive releases during maintenance and cleaning of control devices (e.g., baghouses and cyclones). Contact the District for guidance with control equipment adjustments. Recommended default deposition rates that are used when calculating potential noninhalation health impacts are listed in Section 5.3.2. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

#### **4.2.2 Landfill Emissions**

Emission estimates for landfill sites should be based on testing required under Health and Safety Code, Section (HSC) 41805.5 (AB 3374, Calderon) and any supplemental AB 2588 source tests or emission estimates used to characterize air toxics emissions from landfill surfaces or through off-site migration. The District should be consulted to determine the specific Calderon data to be used in the HRA. The “Hot Spots” Program HRA for landfills should also include emissions of listed substances for all applicable power generation and maintenance equipment at the landfill site. Processes that need to be addressed include stationary internal combustion engines, flares, evaporation ponds, composting operations, boilers, and gasoline dispensing systems.

### **4.3 Source Characterization**

Pollutants are released into the atmosphere in many different ways. The release conditions need to be properly identified and characterized to appropriately use the air dispersion models.

#### **4.3.1 Source Type**

Source types can be identified as point, line, area, or volume sources for input to the air dispersion model. Several air dispersion models have the capability to simulate more than one source type.

##### **4.3.1.1 Point Sources**

Point sources are probably the most common type of source and most air dispersion models have the capability to simulate them. Typical examples of point sources include exhaust stacks. Isolated vents from buildings are special examples of point sources.

##### **4.3.1.2 Line Sources**

The version 12345 or newer of the AERMOD can accommodate line sources. Line sources can be also treated as a special case of either an area or a volume source. Examples of line sources include: conveyor belts and rail lines, freeways, and busy roadways. Not all mobile sources may be subject to the Hot Spots program; however, non-motor vehicles that operate within a facility (e.g., ships, trains, and cranes, etc.) are subject to the Hot Spots program. For more information, see the ARB’s Emission Inventory and Criteria Guidelines document or ARB’s interpretation and guidance

memorandum to CAPCOA regarding mobile sources which are subject to the “Hot Spots” program. This memo can be found at <http://www.arb.ca.gov/ab2588/motorv.pdf>.

Mobile sources and rail lines are required to be evaluated under SB 352. SB 352 requires a risk assessment performed under the Hot Spots risk assessment guidance for proposed school sites within 500 feet of a busy roadway. Dedicated air dispersion models are available for motor vehicle emissions from roadways which are a special type of line source. These models (i.e., CALINE3, CAL3QHCR, and CALINE4) are designed to simulate the mechanical turbulence and thermal plume rise due to the motor vehicle activity on the roadway. However, these dedicated models use the Pasquill-Gifford dispersion stability classes for dispersion; the AERMOD dispersion model uses a more advanced continuous stability estimation method based on observations. The limitation with AERMOD is that the user needs to estimate initial mixing (Szo and Syo) for mechanical turbulence and thermal plume rise. Consult with the District prior to conducting roadway modeling to determine model use.

For practical information on how to simulate roadway emission dispersion using these models, see the California Air Pollution Control Officer’s Association (CAPCOA) website at <http://www.capcoa.org> or the Sacramento Metropolitan AQMD (SMAQMD) website at <http://www.airquality.org/ceqa/RoadwayProtocol.shtml>. The SMAQMD has a document titled, “Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways”(January, 2010). The ARB recommends this document for SB-352 risk assessments.

#### 4.3.1.3 Area Sources

Emissions that are to be modeled as area sources are typical of fugitive sources characterized by non-buoyant emissions containing negligible vertical extent (e.g., no plume rise or emissions distributed over a large horizontal area).

Fugitive particulate (PM<sub>2.5</sub>, PM<sub>10</sub>, TSP) emission sources include areas of disturbed ground (e.g., open pits, parking lots) which may be present during operational phases of a facility’s life. Also included are areas of exposed material (e.g., storage piles and slag dumps) and segments of material transport where potential fugitive emissions may occur (uncovered haul trucks or rail cars, emissions from unpaved roads). Fugitive emissions may also occur during stages of material handling where particulate material is exposed to the atmosphere (uncovered conveyors, hoppers, and crushers).

Other fugitive emissions emanating from many points of release may be modeled as area sources. Examples include fugitive emissions from valves, flanges, venting, and other connections that occur at ground level or at an elevated level or deck if on a building or structure. Modern dispersion models include an option for an initial vertical extent (Szo) where needed.

Modeling portable equipment as an area source is a case-by-case situation that should be discussed with the District or reviewing authority. Situations may exist where this type of operation is best represented as another type of release.

#### 4.3.1.4 Volume Sources

Non-point sources with emissions containing an initial vertical extent should be modeled as volume sources. The initial vertical extent may be due to plume rise or a vertical distribution of numerous smaller sources over a given area. Examples of volume sources include buildings with natural fugitive or passive ventilation, and line sources such as conveyor belts and rail lines.

#### 4.3.2 *Quantity of Sources*

The number of sources at a facility may influence the selection of the air dispersion model. Some dispersion models are capable of simulating only one source at a time, and are therefore referred to as single-source models (e.g., AERSCREEN).

In some cases, for screening purposes, single-source models may be used in situations involving more than one source using one of the following approaches:

- Combining all sources into one single “representative” source

In order to be able to combine all sources into one single source, the individual sources must have similar release parameters. For example, when modeling more than one stack as a single “representative” stack, the stack gas exit velocities and temperatures must be similar. In order to obtain a conservative estimate, the values leading to the higher concentration estimates should typically be used (e.g., the lowest stack gas exit velocity and temperature, the height of the shortest stack, and a receptor distance and spacing that will provide maximum concentrations, etc.).

- Running the model for each individual source and superimposing results

Superimposition of results of single sources of emissions is the actual approach followed by all the Gaussian models capable of simulating more than one source. Simulating sources in this manner may lead to conservative estimates if worst-case meteorological data are used or if the approach is used with a model that automatically selects worst-case meteorological conditions, especially wind direction. The approach will typically be more conservative the farther apart the sources are because each run would use a different worst-case wind direction.

Additional guidance regarding source merging is provided by the U.S. EPA (1995a). It should be noted that depending upon the population distribution, the total burden can actually increase when pollutants are more widely dispersed. If the total burden from the facility or zone of impact (see Section 4.6.1) could increase for the simplifying modeling assumptions described above, the District should be consulted.

#### 4.4 **Terrain Type**

Two types of terrain characterizations are required to select the appropriate model. One classification is made according to land type and another one according to terrain topography.

#### 4.4.1 *Terrain Type – Land Use*

Some air dispersion models (e.g., CALINE) use different dispersion coefficients (sigmas) depending on the land use over which the pollutants are being transported. The land use type is also used by some models to select appropriate wind profile exponents. Traditionally, the land type has been categorized into two broad divisions for the purposes of dispersion modeling: urban and rural. Accepted procedures for determining the appropriate category are those suggested by Irwin (1978): one based on land use classification and the other based on population.

The land use procedure is generally considered more definitive. Population density should be used with caution and should not be applied to highly industrialized areas where the population density may be low. For example, in low population density areas a rural classification would be indicated, but if the area is sufficiently industrialized the classification should already be “urban” and urban dispersion parameters should be used.

If the facility is located in an area where land use or terrain changes abruptly, for example, on the coast, the District should be consulted concerning the classification. If need be, the model should be run in both urban and rural modes and the District may require a classification that biases estimated concentrations towards over prediction. As an alternative, the District may require that receptors be grouped according to the terrain between source and receptor.

AERMOD is the U.S. EPA’s preferred dispersion model for a wide range of applications in rural or urban conditions. The users should refer to section 5.0 of the AERMOD Implementation Guide to determine urban or rural conditions.

The Land Use and the Population Density Procedures discussed above are described as follows.

##### 4.4.1.1 Land Use Procedure

- (1) Classify the land use within the total area  $A$ , circumscribed by a 3 km radius circle centered at the source using the meteorological land use typing scheme proposed by Auer (1978) and shown in Table 4.1.
- (2) If land use types I1, I2, C1, R2 and R3 account for 50 percent or more of the total area  $A$  described in (1), use urban dispersion coefficients. Otherwise, use appropriate rural dispersion coefficients.

##### 4.4.1.2 Population Density Procedure

- (1) Compute the average population density ( $p$ ) per square kilometer with  $A$  as defined in the Land Use procedure described above. (Population estimates are also required to determine the exposed population; for more information see Section 4.6.3.)

(2) If  $p$  is greater than 750 people/km<sup>2</sup> use urban dispersion coefficients, otherwise, use appropriate rural dispersion coefficients.

**Table 4.1 Identification and classification of land use types (Auer, 1978)**

Used to define rural and urban dispersion coefficients in certain models.

Type	Use and Structures	Vegetation
I1	<i>Heavy Industrial</i> Major chemical, steel and fabrication industries; generally 3-5 story buildings, flat roofs	Grass and tree growth extremely rare; <5% vegetation
I2	<i>Light-moderate industrial</i> Rail yards, truck depots, warehouses, industrial parks, minor fabrications; generally 1-3 story buildings, flat roofs	Very limited grass, trees almost totally absent; <5% vegetation
C1	<i>Commercial</i> Office and apartment buildings, hotels; >10 story heights, flat roofs	Limited grass and trees; <15% vegetation
R1	<i>Common residential</i> Single family dwelling with normal easements; generally one story, pitched roof structures; frequent driveways	Abundant grass lawns and light-moderately wooded; >70% vegetation
R2	<i>Compact residential</i> Single, some multiple, family dwelling with close spacing; generally <2 story, pitched roof structures; garages (via alley), no driveways	Limited lawn sizes and shade trees; <30% vegetation
R3	<i>Compact residential</i> Old multi-family dwellings with close (<2 m) lateral separation; generally 2 story, flat roof structures; garages (via alley) and ash pits, no driveways	Limited lawn sizes, old established shade trees; <35% vegetation
R4	<i>Estate residential</i> Expansive family dwelling on multi-acre tracts	Abundant grass lawns and lightly wooded; >80% vegetation
A1	<i>Metropolitan natural</i> Major municipal, state, or federal parks, golf courses, cemeteries, campuses; occasional single story structures	Nearly total grass and lightly wooded; >95% vegetation
A2	Agricultural rural	Local crops (e.g., corn, soybean); >95% vegetation
A3	<i>Undeveloped</i> Uncultivated; wasteland	Mostly wild grasses and weeds, lightly wooded; >90% vegetation
A4	Undeveloped rural	Heavily wooded; >95% vegetation
A5	<i>Water surfaces</i> Rivers, lakes	

#### 4.4.2 *Terrain Type - Topography*

Surface conditions and topographic features generate turbulence, modify vertical and horizontal winds, and change the temperature and humidity distributions in the boundary layer of the atmosphere. These in turn affect pollutant dispersion and models differ in their need to take these factors into account.

The classification according to terrain topography should ultimately be based on the topography at the receptor location with careful consideration of the topographical features between the receptor and the source. Differentiation of simple versus complex terrain is unnecessary with AERMOD. In complex terrain, AERMOD employs the well-known dividing-streamline concept in a simplified simulation of the effects of plume-terrain interactions. For other plume models, topography can be classified as follows:

##### 4.4.2.1 Simple Terrain (also referred to as “Rolling Terrain”)

Simple terrain is all terrain located below stack height including gradually rising terrain (i.e., rolling terrain). Note that *Flat Terrain* also falls in the category of simple terrain.

##### 4.4.2.2 Intermediate Terrain

Intermediate terrain is terrain located above stack height and below plume height. The recommended procedure to estimate concentrations for receptors in intermediate terrain is to perform an hour-by-hour comparison of concentrations predicted by simple and complex terrain models. The higher of the two concentrations should be reported and used in the risk assessment.

##### 4.4.2.3 Complex Terrain

Complex terrain is terrain located above plume height. Complex terrain models are necessarily more complicated than simple terrain models. There may be situations in which a facility is “overall” located in complex terrain but in which the nearby surroundings of the facility can be considered simple terrain. In such cases, receptors close to the facility in this area of simple terrain will “dominate” the risk analysis and there may be no need to use a complex terrain model. It is unnecessary to determine which terrain dominates the risk analysis for users of AERMOD.

#### 4.5 **Level of Detail: Screening vs. Refined Analysis**

Air dispersion models can be classified according to the level of detail which is used in the assessment of the concentration estimates as “screening” or “refined”. Refined air dispersion models use more robust algorithms capable of using representative meteorological data to predict more representative and usually less conservative estimates. Refined air dispersion models are, however, more resource intensive than their screening counterparts. It is advisable to first use a screening model to obtain conservative concentration estimates and calculate health risks. If the health risks are estimated to be above the threshold of concern, then use of a refined model to calculate

more representative concentration and health risk estimates would be warranted. There are situations when screening models represent the only viable alternative (e.g., when representative meteorological data are not available). The district or reviewing authority should be consulted to determine the appropriate method for determining the level of detail in the modeling analysis. The HARP software will incorporate the capability of using either representative meteorological data from AERMOD or the default meteorological conditions from the AERSCREEN model.

It is acceptable to use a refined air dispersion model in a “screening” mode for this program’s health risk assessments. In this case, a refined air dispersion model is used:

- with worst-case meteorology instead of representative meteorology;
- with a conservative averaging period conversion factor to calculate longer term concentration estimates (see Section 4.10 for more discussion on screening air dispersion models and adjustments factors).

Note that use of worst case meteorology in a refined model is not the normal practice in New Source Review or Ambient Air Quality Standard evaluation modeling.

## 4.6 Population Exposure

The level of detail required for the analysis (e.g., screening or refined), and the procedures to be used in determining geographic resolution and exposed population require case-by-case analysis and professional judgment. The District should be consulted before beginning the population exposure estimates, and as results are generated, further consultation may be necessary. Some suggested approaches and methods for handling the breakdown of population and performance of a screening or detailed risk analysis are provided in this section.

In addition to estimating individual cancer risk at specific points such as the MEI (maximally exposed individual), OEHHA recommends determining the number of people who reside within the  $1 \times 10^{-6}$ ,  $1 \times 10^{-5}$ ,  $1 \times 10^{-4}$ , and higher cancer risk isopleths. For noncancer population evaluations, the number of people who reside within the 0.5, one, five, or higher hazard index isopleths should be reported. The HARP software can provide population exposure estimates as cancer burden or as the number of persons exposed to a selected (user identified) health risk/impact level. Information on obtaining the HARP software can be found under the Hot Spots Program on the ARB’s web site at [www.arb.ca.gov](http://www.arb.ca.gov). Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

### 4.6.1 Zone(s) of Impact

As part of the estimation of the population exposure for the cancer risk analysis, it is necessary to determine the geographic area affected by the facility’s emissions. An initial approach to define a “zone of impact” surrounding the source is to generate an isopleth where the total excess lifetime cancer risk from inhalation exposure to all emitted carcinogens is greater than  $10^{-6}$  (one in 1,000,000).

For noncarcinogens, a second, third, and fourth isopleth (to represent the chronic, 8-hour, and acute impacts) should be created to define the zone of impact for the hazard index from both inhalation and noninhalation pathways greater than or equal to 1.0. For clarity these isopleths may need to be presented on separate maps in the HRA.

Contact the District or reviewing authority to discuss inclusion of isopleth maps if all potential health risks fall within the facility boundary and no receptors have, or will ever, be present within the boundary (also see Section 4.7.1 for a discussion of on-site receptors).

The initial “zone of impact” can be determined as follows:

- Use a screening dispersion model (e.g., AERSCREEN) to obtain concentration estimates for each emitted pollutant at varying receptor distances from the source. Several screening models feature the generation of an automatic array of receptors which is particularly useful for determining the zone of impact. In order for the model to generate the array of receptors the user needs to provide some information normally consisting of starting distance, increment and number of intervals.
- Calculate total cancer risk and hazard index (HI) for each receptor location by using the methods provided in the risk characterization sections in Chapter 8 of the Air Toxics Hot Spots Risk Assessment Guidance Manual.
- Find the distance where the total inhalation cancer risk is equal to  $10^{-6}$ ; this may require redefining the receptor array in order to have two receptor locations that bound a total cancer risk of  $10^{-6}$ . Next, find the distance where the chronic, 8-hour, and acute health hazard indices are declared significant by the District (e.g., acute, 8-hour, or chronic HI = 1.0).

Some Districts may prefer to use a cancer risk of  $10^{-7}$  or an HI of 0.5 as the zone of impact. Therefore, the District should be consulted before modeling efforts are initiated. If the zone of impact is greater than 25 km from the facility at any point, then the District should be consulted. The District may specify limits on the area of the zone of impact. Ideally, these preferences would be presented in the modeling protocol (see Section 4.14).

Note that when depicting the risk assessment results, risk isopleths must present the total cancer and noncancer risk from both inhalation and noninhalation pathways. The zone of impact should be clearly shown on a map with geographic markers of adequate resolution (see Section 4.6.3.1). The text below discusses methodology for defining the zone of impact and has format recommendations. Chapter 9 provides an outline that specifies the content and recommended format of all HRA results.

The zone of impact can be defined once the exposure assessment (air dispersion modeling) process has determined the pollutant concentrations at each designated off-site receptor and a risk analysis (see Chapter 8) has been performed. For clarity, the cancer and noncancer zone(s) of impact should be presented on separate maps. A

map illustrating the carcinogenic zone of impact is required. The District may at its discretion ask for the map illustrating the potential carcinogenic zone of impact to identify the zone of impact for the minimum exposure pathways (inhalation, soil, dermal, and mother's milk) and the zone of impact for all applicable pathways of exposure (minimum pathways plus site/route dependent pathways). Two maps may be needed to accomplish this. The legend of these maps should state the level(s) used for the zone of impact and identify the exposure pathways that were included in the assessment.

The noncancer maps should also clearly identify the noncancer zones of impact. These include the acute (inhalation) zone of impact, 8-hour (inhalation) zone of impact and the chronic (including both inhalation, multipathway) zone of impact. The District may at its discretion require separate chronic inhalation and chronic multipathway zones of impact maps. For clarity, presentation of the two chronic zones of impact may also require two or more maps. The legend of these maps should state the level(s) used for the zone of impact and identify the exposure pathways (and target organs) that were included in the assessment. Further information regarding the methods for determination of hazard indices and cancer risk are discussed in Chapter 8 and Appendix I.

#### **4.6.2 Screening Population Estimates for Risk Assessments**

A screening risk assessment should include an estimate of the maximum exposed population. For screening risk assessments, a detailed description of the exposed population is not required. The impact area to be considered should be selected to be health protective (i.e., will not underestimate the number of exposed individuals). A health-protective assumption is to assume that all individuals within a large radius of the facility are exposed to the maximum concentration. If a facility must also comply with the RCRA/CERCLA risk assessment requirements, health effects to on-site workers may also need to be addressed. The DTSC's Remedial Project Manager should be consulted on this issue. The District should be consulted to determine the population estimate that should be used for screening purposes. Guidance for one screening method is presented here.

1. Use a screening dispersion model (e.g., AERSCREEN) to obtain concentration estimates for each emitted pollutant at varying receptor distances from the source. Several screening models feature the generation of an automatic array of receptors that is particularly useful for determining the zone of impact. In order for the model to generate the array of receptors, the user needs to provide some information normally consisting of starting distance, increment, and number of intervals.
2. Calculate the potential cancer risk and hazard index for each receptor location by using the methods provided in the risk characterization sections of this document (Chapter 8).
3. Find the distance where the potential cancer risk is equal to District specified levels (e.g.,  $10^{-6}$ ); this may require redefining the receptor array in order to have

two receptor locations that bound a total cancer risk of  $10^{-6}$ . This exercise should be repeated for the noncancer health impacts.

4. Calculate cancer burden by estimating the number of people in the grid and stipulate that all are exposed at the highest level.

#### **4.6.3 Refined Population Estimates for Risk Assessments**

The refined HRA requires a detailed analysis of the population exposed to emissions from the facility. Where possible, a detailed population exposure analysis provides estimates of the number of individuals in residences and offsite workplaces, as well as at sensitive receptor sites such as schools, daycare centers and hospitals. The District may require that locations with high densities of sensitive individuals be identified (e.g., schools, daycare centers, hospitals). These population analyses can include exposure estimates for workers and residents through the use of land use maps or other tools. The overall exposed residential and worker populations should be apportioned into smaller geographic subareas. The information needed for each subarea is:

1. The number of exposed persons, and
2. The receptor location at which the calculated ambient air concentration is assumed to be representative of the exposure to the entire population in the subarea.

A multi-tiered approach is suggested for the population analysis. Census tracts, which the facility could significantly impact, should be identified (see Section 4.6.3.1). A census tract should be divided into smaller subareas if it is close to the facility where ambient concentrations vary widely. The District may determine that census tracts provide sufficient resolution near the facility to adequately characterize population exposure or they may prefer the census information to be evaluated using smaller blocks. Further downwind where ambient concentrations are less variable, the census tract level may be acceptable to the District. The District may determine that the aggregation of census tracts (e.g., when the census tracts making up a city are combined) is appropriate for receptors that are considerable distances from the facility.

If a facility must also comply with the RCRA/CERCLA HRA requirements, health effects to on-site workers may also need to be addressed. The DTSC's Remedial Project Manager should be consulted on this issue. In some cases it may be appropriate to evaluate risks to on-site receptors. The district should be consulted about special cases for which evaluation of on-site receptors is appropriate, such as facilities frequented by the public or where people may reside (e.g., military facilities).

##### **4.6.3.1 Census Tracts**

For a refined risk assessment, the boundaries of census tracts can be used to define the geographic area to be included in the population exposure analysis. Digital maps showing the census tract boundaries in California can be obtained from "The Thomas

Guide”® on the World Wide Web. Statistics for each census tract can be obtained from the U.S. Census Bureau. The website address for the U.S. Census Bureau is <http://www.census.gov>. Numerous additional publicly accessible or commercially available sources of census data can be found on the World Wide Web. A specific example of a census tract is given in Appendix K. The HARP software includes U.S. census data and is a recommended tool for performing population exposure estimates.

The two basic steps in defining the area under analysis are:

(1) Identify the “zone of impact” (as defined previously in Section 4.6.1) on a map detailed enough to provide for resolution of the population to the subcensus tract level. (The U.S. Geological Survey (USGS) 7.5-minute series maps and the maps within the HARP software provide sufficient detail.) This is necessary to clearly identify the zone of impact, location of the facility, and sensitive receptors within the zone of impact. If significant development has occurred since the USGS survey, this should be indicated. A specific example of a 7.5-minute series map is given in Appendix K.

(2) Identify all census tracts within the zone of impact using a U.S. Bureau of Census or equivalent map (e.g., Thomas Brothers, HARP Software). If only a portion of the census tract lies within the zone of impact, then only the population that falls within the isopleth should be used in the population estimate or burden calculation. To determine this level of detail, local planning and zoning information may need to be collected. When this more detailed information is not available, then a less refined approach is to include the census data if the centroid of the census block falls within the isopleths of interest. The census tract boundaries should be transferred to a map, such as a USGS map (referred to hereafter as the “base map”).

An alternative approach for estimating population exposure in heavily populated urban areas is to apportion census tracts to a Cartesian grid cell coordinate system. This method allows a Cartesian coordinate receptor concentration field to be merged with the population grid cells. This process can be computerized and minimizes manual mapping of centroids and census tracts. The HARP software includes this function and will provide population estimates that are consistent with the methodology discussed here.

The District may determine that aggregation of census tracts (e.g., which census tracts making up a city can be combined) is appropriate for receptors that are located at considerable distances from the facility. If the District permits such an approach, it is suggested that the census tract used to represent the aggregate be selected in a manner to ensure that the approach is health protective. For example, the census tract included in the aggregate that is nearest (downwind) to the facility should be used to represent the aggregate.

#### *4.6.3.1.1 Subcensus Tract*

Within each census tract are smaller population units. These units [urban block groups (BG) and rural enumeration districts (ED)] contain about 1,100 persons. BGs are

further broken down into statistical units called blocks. Blocks are generally bounded by four streets and contain an average of 70 to 100 persons. However, this range in population is an average and population units may vary significantly. In some cases, the EDs are very large and identical to a census tract.

The area requiring detailed (subcensus tract) resolution of the exposed residential and worker population will need to be determined on a case-by-case basis through consultation with the District. The District may determine that census tracts provide sufficient resolution near the facility to adequately characterize population exposure.

Employment population data can be obtained at the census tract level from the U.S. Census Bureau or from local planning agencies. This degree of resolution will generally not be sufficient for most risk assessments. For the area requiring detailed analysis, zoning maps, general plans, and other planning documents should be consulted to identify subareas with worker populations.

The boundaries of each residential and employment population area should be transferred to the base map.

#### **4.6.4 Sensitive Receptor Locations**

Individuals who may be more sensitive to toxic exposures than the general population are distributed throughout the total population. Sensitive populations may include young children and chronically ill individuals. The District may require that locations with high densities of sensitive individuals be identified (e.g., schools, nursing homes, residential care facilities, daycare centers, and hospitals). The HRA should state what the District requirements are regarding identification of sensitive receptor locations.

Although protection of sensitive individuals is incorporated into OEHHA's risk assessment methodology in both cancer risk and noncancer risk assessment, the assessment of risk at the specific location of such sensitive individuals (e.g., schools, hospitals, or nursing homes) may be useful to assure the public that such individuals are being considered in the analysis. For some chemicals (e.g., mercury and manganese) children have been specifically identified as the sensitive subpopulation for noncancer health impacts, so it can be particularly appropriate to assess school sites.

### **4.7 Receptor Siting**

#### **4.7.1 Receptor Points**

The modeling analysis should contain a network of receptor points with sufficient detail (in number and density) to permit the estimation of the maximum concentrations. Locations that must be identified include:

- The maximum estimated off-site impact or point of maximum impact (PMI),
- The maximum exposed individual at an existing residential receptor (MEIR),
- The maximum exposed individual at an existing occupational worker receptor (MEIW).

Note that some situations may also require that on-site receptor (worker or residential) locations be evaluated. The risk assessor can contact the District or reviewing authority for guidance if on-site exposure situations are present at the emitting facility. However, these on-site locations should be included in the HRA. Some examples where the health impacts of on-site receptors may be appropriate could be military base housing, prisons, universities, day care facilities, or locations where the public may have regular access for the appropriate exposure period (e.g., a lunch time café or museum for acute exposures). When a receptor lives and works on the facility, site, or property, then these receptors should be evaluated and reported under both residential and worker scenarios and the one that is most health protective should be used for risk management decisions. The cancer risk estimates for the onsite residents may use a 30-year exposure duration while the 25-year exposure duration is used for a worker. Under a Tier 2 analysis, alternate exposure durations may be evaluated and presented with all assumptions supported.

All of these locations (i.e., PMI, MEIR, and MEIW) must be identified for potential multipathway carcinogenic and noncarcinogenic effects. It is possible that the estimated PMI, MEIR, and MEIW risk for cancer, chronic noncancer, 8-hour, and acute noncarcinogenic risks occur at different locations or that some of these evaluations may not be necessary (e.g., the receptor does not exist). For example, some facilities will not have off-site workers in the vicinity of the facility and will not need to evaluate worker exposure, or the exposure situation may only require the evaluation of short-term carcinogenic or acute noncancer impacts (see Section 8.2.10 for a discussion of short-term projects). The approval to revise the exposure assessment for a receptor, or to omit the MEIW receptor, should be verified in writing with the District or reviewing authority and included in the HRA.

Other sensitive receptor locations may also be of interest and required to be included in the HRA. The District or reviewing authority should be consulted to determine which sensitive receptor locations must be included.

The results from a screening model (if available) can be used to identify the area(s) where the maximum concentrations are likely to occur. Receptor points should also be located at the population centroids (see Section 4.7.2) and sensitive receptor locations (see Section 4.6.4). The exact configuration of the receptor array used in an analysis will depend on the topography, population distribution patterns, and other site-specific factors. All receptor locations should be identified in the HRA using UTM (Universal Transverse Mercator) coordinates and receptor number. The receptor numbers in the summary tables should match receptor numbers in the computer output (e.g., HARP output files). In addition to actual UTM coordinates, the block/street locations (i.e., north side of 3,000 block of Smith Street) should be provided in the HRA for the PMI, MEIR, and MEIW for carcinogenic and noncarcinogenic health effects. Chapter 9 provides an outline that specifies the content and recommended format of HRA results.

#### 4.7.1.1 Receptor Height

To evaluate localized impacts, receptor height should be taken into account at the point of maximum impact on a case-by-case basis. For example, receptor heights may have to be included to account for receptors significantly above ground level. Flagpole receptors at the height of the breathing zone of a person may need to be considered when the source receptor distance is less than a few hundred meters. Consideration must also be given to the noninhalation pathway analysis which requires modeling of chemical deposition onto soil or water at ground level. For the inhalation pathway, a health protective approach is to select a receptor height from 0 meters to 1.8 meters that will result in the highest predicted downwind concentration. Final approval of this part of the modeling protocol should be with the District or reviewing authority.

#### 4.7.2 ***Centroid Locations***

For each subarea analyzed, a centroid location (the location at which a calculated ambient concentration is assumed to represent the entire subarea) should be determined. When population is uniformly distributed within a population unit, a geographic centroid based on the shape of the population unit can be used. If only a portion of the census tract lies within the isopleth or area of interest, then only the population that falls within the isopleth should be used in the calculation for population exposure. To determine this level of detail, local planning and zoning information may need to be collected. Where populations are not uniformly distributed, a population-weighted centroid may be used. Another alternative uses the concentration at the point of maximum impact within that census tract as the concentration to which the entire population of that census tract is exposed. While this less refined approach is commonly accepted, Districts should be contacted to approve this method prior to its use in a risk assessment.

The centroids represent locations that should be included as receptor points in the dispersion modeling analysis. Annual average concentrations should be calculated at each centroid using the modeling procedures presented in this chapter.

For census tracts and BG/EDs, judgments can be made using census tracts maps and street maps to determine the centroid location. At the block level, a geographic centroid is sufficient.

#### 4.7.3 ***Spatial Averaging***

Since the inception of the “Hot Spots” and California’s Air Toxics Programs, HRA results for an individual receptor have typically been based on air dispersion modeling results at a single point or location. With a few exceptions, this method has been traditionally used for all types of receptors (e.g., PMI, MEIR, MEIW, pathway receptors, etc.). The assumptions used in risk assessment are designed to prevent underestimation of health impacts to the public resulting in a health protective approach. However, basing risk estimates on a single highest point (PMI, MEIR, or MEIW) does not take into account that a person does not remain at one location on their property, or in one location at the

workplace over an extended period of time. Therefore, the average air concentration over a small area is likely to be more representative than using the air concentration at a single point, particularly in those situations where concentrations fall off rapidly around that single point. The concept of averaging air concentrations over a small area is known as spatial averaging.

In order to understand how spatial averaging can impact air dispersion modeling results with various types of facilities, the ARB, in conjunction with the OEHHA, performed sensitivity analyses to evaluate the impacts of spatially averaging air dispersion modeling results (see Appendix C of the Air Toxics Hot Spots Program Risk Assessment Guidelines: Technical Support Document for Exposure Assessment and Stochastic Analysis (EASA)). Based on these sensitivity analyses, it is reasonable and appropriate to include spatial averaging techniques in air toxic risk assessments as supplemental information to Tier 1 information (i.e., modeling results that are based on the air concentration from a single point or location). While all risk assessments must include results based on Tier 1 methodology, the spatially averaged concentrations around the point of interest (e.g., PMI, MEIR, MEIW, multipathway exposure evaluations, etc.) could also be included as an option in risk assessments and acceptable for risk management decisions subject to approval by the District or reviewing agency. Spatial averaging is an option for the purpose of additional refinement to the risk assessment.

A few reasons that support the inclusion of spatially averaged modeled concentrations in risk assessment include the following:

- Averaging results over a small domain will give a more representative picture of individual exposure and risk than an estimate based on one single location within their property.
- Spatial averaging will allow air dispersion modeling and risk assessment results to be characterized as the estimated concentration and risk in a discrete area of interest, rather than an exact value for a single location.
- From a risk communication standpoint, the ARB and OEHHA feel it is more appropriate to present the modeling output and the calculated health impacts as the potential impacts within a small or discrete area, rather than an exact value at a specific point on a grid or map.
- Spatial averaging is the recommended procedure in ARB's Lead Risk Management Guidelines (2001) and has been used in several complex source HRAs [e.g., Roseville Railyard (2004), Ports of LA/LB (2006), Port of Oakland (2008)].
- Spatially averaging the deposition concentrations over pasture land, a garden, or a water body for multipathway exposure scenarios is a planned upgrade for the HARP Software. This will provide an option that will refine multipathway exposure assessments. Average deposition on these types of areas (e.g., a water body) is not necessarily well represented by the single highest point of deposition, or deposition at the geographic center of the water body. Likewise, since produce is grown over the entire surface of the garden and cows graze the

entire pasture, deposition is better estimated by evaluating the entire area rather than using a single point.

#### 4.7.3.1 Spatial Averaging Methodology

The spatial averaging sensitivity study in Appendix C of the EASA is based on simulating emissions from point, volume, area, and line sources. Most source types (e.g., point) are simulated as a small, medium or large source. Line sources are only simulated as small and large. In addition, meteorological data collected at five different locations in California were used. Nested spatial average grids of various domains were used to study the differences on the spatial average concentration. In the case of the 20 meter by 20 meter spatial average nested grid, the spatial average concentration showed little change over the PMI for medium and large sources. In the case for small sources, the spatial average concentration is approximately 45% to 80% of the PMI concentration. Individual source type and meteorological conditions will cause variations in these results.

The results of the spatial averaging sensitivity study in Appendix C of the EASA shows that sources with low plume rise that result in a PMI, MEIW, or MEIR located at or near the property fence line are most sensitive to spatial averaging. Source types with high plume rise (e.g., tall stacks) show a PMI far downwind where the concentration gradient is more gradual and therefore spatial averaging has a lesser effect. While spatial averaging can be used regardless of source size or the location of the PMI, the following conditions generally apply when a source is a good candidate for spatial averaging:

- The MEIR, MEIW, or PMI is located at the fence line or close to the emission source.
- The concentration gradient is high near the PMI. This is more associated with low level plumes such as fugitive, volume, area, or short stacks.
- A long term average is being calculated to represent a multi-year risk analysis based on one to five years of meteorological data. Note that spatial averaging should **not** be used for short term (acute) calculations.

In general, the method for calculating the spatial average in air toxic risk assessments includes the following steps:

1. Locate the point(s) of interest and receptor(s) (i.e., PMI, MEIW, MEIR, and any additional receptor locations of interest or concern) with a grid resolution spacing of no greater than five meters. To achieve this, two or more modeling runs with successively finer nested grid resolutions may be needed to find the final location where the nested grid that will be used for spatial averaging will be placed.

2. Center the spatial average nested grid on the each receptor's location of interest determined in step 1. Limit the nested grid to no larger than 20 meters by 20 meters or 400 square meters. Note that if a portion of the centered and nested grid falls within the facility boundary and the receptor location of interest is outside of the boundary, then adjustments to the nested grid to obtain the spatially-averaged concentration for the offsite receptor are reasonable. This may be done by either repositioning the nested grid to cover 400 square meters of off-boundary area surrounding the receptor or center the nested grid and delete any on-site grid points so that only the offsite grid points surrounding the receptor are used in the spatially averaged concentration. The grid resolution spacing should be no greater than five meters. With a five meter grid resolution, the 20 meter by 20 meter domain will result in 25 receptors. The size, shape, and placement of the domain and the resolution of points are subject to approval by the District, ARB, or other reviewing authority. See the Sections 4.7.3.1.2 and 4.7.3.1.3 below for additional discussion on domain sizing and grid spacing at worksites, pastures, gardens, and water bodies.
3. Some configurations of source activity and meteorological conditions result in a predominant downwind plume center line that is significantly askew from one of the four ordinate directions. In this case, a tilted nested grid is necessary to coincide with the dominant plume centerline. Polar receptors are easier to implement than a tilted rectangular grid. The domain of the polar receptor field should be limited to a 15 meter radius. See Appendix C of the EASA for detailed instructions on tilted polar receptors.
4. Calculate the arithmetic mean of the long term period average concentration (e.g., annual average) of the nested grid of receptors to represent the spatial average. This average is used in the risk calculations.
5. Document and include all methods, assumptions, data, maps, and files used in the spatial averaging analysis and clearly present this information in the risk assessment following the requirements of the District or reviewing authority. Note that in the update to the HARP software, functionality will be included that will assist with spatial averaging and the methodology discussed.

The following sections discuss the use of spatial averaging for various receptor types and exposure pathways.

#### *4.7.3.1.1 Residential Receptors*

Follow the steps in Section 4.7.3 outlining the spatial averaging methodology. To remain health protective when evaluating a residential receptor, spatial averaging should not take place using large nested domains. The domain used for spatial averaging should be no larger than 20 meters by 20 meters with a maximum grid spacing resolution of equal to or less than five meters. This domain represents an area

that is approximately the size of a small urban lot. The size of the domain and resolution of points shall be subject to approval by the District, ARB, or other reviewing authority.

#### 4.7.3.1.2 *Worker Receptors*

Offsite worker locations (e.g. MEIW) may also be a candidate for spatial averaging. However, workers can be at the same location during almost their entire daily work shift (e.g., desk/office workers). When this is the situation, then the traditional method of using a single location and corresponding modeled concentration is appropriate. If spatial averaging is used, care should be taken to determine the proper domain size and grid resolution. Follow the steps in Section 4.7.3 outlining the spatial averaging methodology. To be consistent with the residential receptor assumptions and remain health protective, a modeling domain size no larger than 20 meters by 20 meters is recommended with a grid spacing resolution of equal to or less than five meters. However, if workers routinely and continuously move throughout the worksite over a space greater than 20 meters by 20 meters, then a larger domain may be considered.

The HRA or modeling protocol shall support all assumptions used, including, but not limited to, documentation for all workers showing the area where each worker routinely performs their duties and the percentage of time spent in those areas. The final domain size should not be greater than the smallest area of worker movement. Other considerations for determining domain size and grid spacing resolution may include an evaluation of the concentration gradients across the worker area. The grid spacing used within the domain to find the concentration that will be used to calculate health impacts should be sufficient in number and detail to obtain a representative concentration across the area of interest. The size of the domain and resolution of points shall be subject to approval by the District, ARB, or other reviewing authority.

#### 4.7.3.1.3 *Pastures, Gardens, or Water Bodies*

The simplified approach of using the concentration (deposition rate) at the centroid, a specific point of interest, or the PMI location for an area being evaluated for noninhalation exposures (e.g., a body of water used for fishing, a pasture used for grazing, area of a garden, etc.) is acceptable for use in HRA. However, evaluating deposition concentrations over pasture land, a garden, or a water body for multipathway exposure scenarios using spatial averaging could give more representative estimates of the overall deposition rate. Use of spatial averaging in this application is subject to approval by the District, ARB, or other reviewing authority.

If spatial averaging will be done, follow the steps in Section 4.7.3.1 outlining the spatial averaging methodology. When using spatial averaging over the deposition area, care should be taken to determine the proper domain size to make sure it includes all reasonable areas of potential deposition. The size and shape of the area of interest (e.g., pasture or water body) should be identified and used for the modeling domain. The grid spacing or resolution used within the domain should be sufficient in detail to obtain a representative deposition concentration across the area of interest. One way

to determine the grid resolution is to include an evaluation of the concentration gradients across the deposition area. The HRA or modeling protocol shall support all assumptions used, including, but not limited to, documentation of the deposition area (e.g., size and shape of the pasture, garden, or water body, maps, representative coordinates, grid resolution, concentration gradients, etc.). The size of the domain and grid resolution is subject to approval by the reviewing authority.

In lieu of following the details in the paragraph above, the approach used for the other receptors (e.g., MEIR, MEIW) that uses a domain size not greater than 20 meters by 20 meters, located on the PMI within the area of interest, with a maximum grid spacing resolution of five meters, can be used. This default refined approach would apply to deposition areas greater than 20 meters by 20 meters. For smaller deposition areas, the simplified approach of using the PMI for the area, the concentration at the centroid or a specific point of interest, or averaging over the actual smaller domain can be used. This again is subject to approval by the reviewing authority.

The HRA or modeling protocol shall support all assumptions used, including, but not limited to, documentation of the deposition area (e.g., size and shape of the water body, pasture, or garden; all data; maps; representative coordinates, and etc.), and the details clarifying how and where the averaging was done (e.g., location and magnitude of concentration gradients, the grid spacing used).

#### **4.8 Meteorological Data**

Refined air dispersion models require hourly meteorological data. The first step in obtaining meteorological data should be to check with the District and the ARB for data availability. Other sources of data include the National Weather Service (NWS), National Climatic Data Center (NCDC), Asheville, North Carolina, ARB meteorological database (METDB), military stations and private networks. Meteorological data for a subset of NWS stations are available from the U.S. EPA Support Center for Regulatory Air Models (SCRAM). The SCRAM can be accessed at [www.epa.gov/scram001/main.htm](http://www.epa.gov/scram001/main.htm). All meteorological data sources should be approved by the District. Data not obtained directly from the District or the ARB should be checked for quality, representativeness, and completeness. It should be approved by the District before use. U.S. EPA provides guidance (U.S. EPA, 1995e) for these data. Meteorological data may need further processing. Data users can consult with the District or the ARB on how to process the raw meteorological data. The risk assessment should indicate if the District required the use of a specified meteorological data set. All memos indicating District approval of meteorological data should be attached in an appendix. If no representative meteorological data are available, screening procedures should be used as indicated in Section 4.10.

The analyst should acquire enough meteorological data to ensure that the worst-case meteorological conditions are represented in the model results. The US-EPA Guideline on Air Quality Models (U.S. EPA 2005) prefers that the latest five years of consecutive meteorological data be used to represent long term averages (i.e., cancer and chronic impacts). Previous OEHHA guidance allowed the use of the worst-case year to save

computer time. The processing speed of modern computers has increased to the point where processing five years of data over one year is no longer burdensome. However, the District may determine that one year of representative meteorological data is sufficient to adequately characterize the facility's impact. This may especially be the case when five years of quality consecutive data are not available.

To determine long term average concentrations the data can be averaged. For calculation of the one-hour maximum concentrations needed to evaluate acute effects, the worst-case year should be used in conjunction with the maximum hourly emission rate. For example, the long term average concentration and one-hour maximum concentration at a single receptor for five years of meteorological data are calculated below:

Year	Annual Average ( $\mu\text{g}/\text{m}^3$ )	Maximum One-Hour ( $\mu\text{g}/\text{m}^3$ )
1	7	100
2	5	80
3	9	90
4	8	110
5	6	90
5-year average	7	

In the above example, the long-term average concentration over five years is  $7 \mu\text{g}/\text{m}^3$ . Therefore,  $7 \mu\text{g}/\text{m}^3$  should be used to evaluate carcinogenic and chronic effects (i.e., annual average concentration). The one-hour maximum concentration is the highest one-hour concentration in the five-year period. Therefore,  $110 \mu\text{g}/\text{m}^3$  is the peak one-hour concentration that should be used to evaluate acute effects.

The higher hourly concentration usually occurs when meteorological dispersion conditions become worse, such as, calm or light wind, inversion, etc. Inversion usually happens in late afternoon through early morning. As the sun goes down, the atmospheric temperature near surface starts to fall, usually faster than the temperature in the upper atmosphere causing a temperature inversion layer to form and extend downward. This inversion layer usually sustains throughout the night, and remains until early morning. Because of the inversion (cold air sitting on warm air at the top of the inversion layer), pollutant vertical mixing is very low in the morning.

When predicted concentrations are high and the mixing height is very low for the corresponding averaging period, the modeling results deserve additional consideration. For receptors in the near field, it is within the model formulation to accept a very low mixing height for short durations. However, it would be unlikely that the very low mixing height would persist long enough for the pollutants to travel into the far field. In the

event that the analyst identifies any of these time periods, they should be discussed with the District on a case-by-case basis.

#### **4.8.1 Meteorological Data Formats**

Most short-term dispersion models require input of hourly meteorological data in a format which depends on the model. U.S. EPA provides software for processing meteorological data for use in U.S. EPA recommended dispersion models. U.S. EPA recommended meteorological processors include the Meteorological Processor for Regulatory Models (MPRM), PCRAMMET, and AERMET. Use of these processors will ensure that the meteorological data used in an U.S. EPA recommended dispersion model will be processed in a manner consistent with the requirements of the model.

Meteorological data for a subset of NWS stations are available on the World Wide Web at the U.S. EPA SCRAM address, <http://www.epa.gov/scram001>.

#### **4.8.2 Treatment of Calms**

Calms are hours when the wind speed is below the starting threshold of the anemometer. Gaussian plume models require a wind speed and direction to estimate plume dispersion in the downwind direction.

U.S. EPA's policy is to disregard calms until such time as an appropriate analytical approach is available. The recommended U.S. EPA models contain a routine that eliminates the effect of the calms by nullifying concentrations during calm hours and recalculating short-term and annual average concentrations. Certain models lacking this built-in feature can have their output processed by U.S. EPA's CALMPRO program (U.S. EPA, 1984a) to achieve the same effect. Because the adjustments to the concentrations for calms are made by either the models or the postprocessor, actual measured on-site wind speeds should always be input to the preprocessor. These actual wind speeds should then be adjusted as appropriate under the current U.S. EPA guidance by the preprocessor.

Following the U.S. EPA methodology, measured on-site wind speeds of less than 1.0 m/s, but above the instrument threshold, should be set equal to 1.0 m/s by the preprocessor when used as input to Gaussian models. Calms are identified in the preprocessed data file by a wind speed of 1.0 m/s and a wind direction equal to the previous hour. For input to AERMOD, no adjustment should be made to the site specific wind data. AERMOD can produce model estimates for conditions when the wind speed may be less than 1 m/s but still greater than the instrument threshold. Some air districts provide pre-processed meteorological data for use in their district that treats calms differently. Local air districts should be consulted for available meteorological data. In addition, to reduce the number of calms and missing winds in the surface data, EPA has developed a pre-processor – AERMINUTE – to process 1-minute ASOS wind data for generating hourly average wind speed and directions for input to AERMET in Stage 2. The details can be found in the EPA's AERMINUTE User's Instructions at:

[http://www.epa.gov/ttn/scram/models/aermod/aerminute\\_userguide\\_v11059\\_draft.pdf](http://www.epa.gov/ttn/scram/models/aermod/aerminute_userguide_v11059_draft.pdf)

If the fraction of calm hours is excessive, then an alternative approach may need to be considered to characterize dispersion. The Calpuff model modeling system can simulate calm winds as well as complex wind flow and therefore is a viable alternative. The local air district should be consulted for alternative approaches.

#### **4.8.3 Treatment of Missing Data**

Missing data refer to those hours for which no meteorological data are available from the primary on-site source for the variable in question. When missing values arise, they should be handled in one of the following ways listed below, in the following order of preference:

- (1) If there are other on-site data, such as measurements at another height, they may be used when the primary data are missing. If the height differences are significant, corrections based on established vertical profiles should be made. Site-specific vertical profiles based on historical on-site data may also be appropriate to use if their determination is approved by the reviewing authority. If there is question as to the representativeness of the other on-site data, they should not be used.
- (2) If there are only one or two missing hours, then linear interpolation of missing data may be acceptable, however, caution should be used when the missing hour(s) occur(s) during day/night transition periods.
- (3) If representative off-site data exist, they may be used. In many cases this approach may be acceptable for cloud cover, ceiling height, mixing height, and temperature. This approach will rarely be acceptable for wind speed and direction. The representativeness of off-site data should be discussed and agreed upon in advance with the reviewing authority.
- (4) An imputation methodology may be acceptable, provided it is well-documented, sufficiently justified, and properly applied.
- (5) Failing any of the above, the data field should be coded as missing using missing data codes appropriate to the applicable meteorological pre-processor.

Appropriate model options for treating missing data, if available in the model, should be employed. Substitutions for missing data should only be made in order to complete the data set for modeling applications, and should not be used to attain the “regulatory completeness” requirement of 90%. That is, the meteorological data base must be 90% complete on a monthly basis (before substitution) in order to be acceptable for use in air dispersion modeling. The use of any data substitution technique should be thoroughly documented to provide the District or reviewing authority with all the information necessary to determine its approvability.

If the recommended methods for addressing missing meteorological data cannot be achieved as described, then alternative approaches should be discussed and developed in conjunction with the District or reviewing authority.

#### **4.8.4 Representativeness of Meteorological Data**

The atmospheric dispersion characteristics at an emission source need to be evaluated to determine if the collected meteorological data can be used to adequately represent atmospheric dispersion for the project.

Such determinations are required when the available meteorological data are acquired at a location other than that of the proposed source. In some instances, even though meteorological data are acquired at the location of the pollutant source, they still may not correctly characterize the important atmospheric dispersion conditions.

Considerations of representativeness are always made in atmospheric dispersion modeling whether the data base is "on-site" or "off-site." These considerations call for the judgment of a meteorologist or an equivalent professional with expertise in atmospheric dispersion modeling. If in doubt, the District should be consulted.

##### **4.8.4.1 Spatial Dependence**

The location where the meteorological data are acquired should be compared to the source location for similarity of terrain features. For example, in complex terrain, the following considerations should be addressed in consultation with the District:

- Aspect ratio of terrain, i.e., ratio of:
  - Height of valley walls to width of valley;
  - Height of ridge to length of ridge; and
  - Height of isolated hill to width of hill at its base
- Slope of terrain
- Ratio of terrain height to stack/plume height
- Distance of source from terrain (i.e., how close to valley wall, ridge, isolated hill)
- Correlation of terrain feature to prevailing meteorological conditions

Likewise, if the source is located on a plateau or plain, the source of meteorological data used should be from a similar plateau or plain.

Judgments of representativeness should be made only when sites are climatologically similar. Sites in nearby, but different air sheds, often exhibit different weather patterns. For instance, meteorological data acquired along a shoreline are not normally representative of inland sites and vice versa.

Meteorological data collected need to be examined to determine if drainage, transition, and synoptic flow patterns are characteristics of the source, especially those critical to the regulatory application. Consideration of orientation, temperature, and ground cover should be included in the review.

An important aspect of space dependence is height above the ground. Where practical, meteorological data should be acquired at the release height, as well as above or below, depending on the buoyancy of the source's emissions. AERMOD at a minimum requires wind observations at a height above ground between seven times the local surface roughness height and 100 meters.

#### 4.8.4.2 Temporal Dependence

To be representative, meteorological data must be of sufficient duration to define the range of sequential atmospheric conditions anticipated at a site. As a minimum, one full year of on-site meteorological data is necessary to prescribe this time series. Multiple years of data are used to describe variations in annual and short-term impacts. Consecutive years from the most recent, readily available 5-year period are preferred to represent these yearly variations.

#### 4.8.4.3 Further Considerations

It may be necessary to recognize the non-homogeneity of meteorological variables in the air mass in which pollutants disperse. This non-homogeneity may be essential in correctly describing the dispersion phenomena. Therefore, measurements of meteorological variables at multiple locations and heights may be required to correctly represent these meteorological fields. Such measurements are generally required in complex terrain or near large land-water body interfaces.

It is important to recognize that, although certain meteorological variables may be considered unrepresentative of another site (for instance, wind direction or wind speed), other variables may be representative (such as temperature, dew point, cloud cover). Exclusion of one variable does not necessarily exclude all. For instance, one can argue that weather observations made at different locations are likely to be similar if the observers at each location are within sight of one another - a stronger argument can be made for some types of observations (e.g., cloud cover) than others. Although by no means a sufficient condition, the fact that two observers can "see" one another supports a conclusion that they would observe similar weather conditions.

Other factors affecting representativeness include change in surface roughness, topography and atmospheric stability. Currently there are no established analytical or statistical techniques to determine representativeness of meteorological data. The establishment and maintenance of an on-site data collection program generally fulfills the requirement for "representative" data. If in doubt, the District should be consulted.

#### **4.8.5 *Alternative Meteorological Data Sources***

It is necessary, in the consideration of most air pollution problems, to obtain data on site-specific atmospheric dispersion. Frequently, an on-site measurement program must be initiated. As discussed in Section 4.8.3, representative off-site data may be used to substitute for missing periods of on-site data. There are also situations where current or past meteorological records from a National Weather Service station may suffice. These considerations call for the judgment of a meteorologist or an equivalent professional with expertise in atmospheric dispersion modeling. More information on Weather Stations including: National Weather Service (NWS), military observations, supplementary airways reporting stations, upper air and private networks, is provided in “On-Site Meteorological Program Guidance for Regulatory Modeling Applications” (U.S. EPA, 1995e).

##### **4.8.5.1 Recommendations**

On-site meteorological data should be processed to provide input data in a format consistent with the particular models being used. The input format for U.S. EPA short-term regulatory models is defined in U.S. EPA’s MPRM. The input format for AERMOD is defined in the AERMET meteorological pre-processor. Processors are available on the SCRAM web site. The actual wind speeds should be coded on the original input data set. Wind speeds less than 1.0 m/s but above the instrument threshold should be set equal to 1.0 m/s by the preprocessor when used as input to Gaussian models. Wind speeds below the instrument threshold of the cup or vane, whichever is greater, should be considered calm, and are identified in the preprocessed data file by a wind speed of 1.0 m/s and a wind direction equal to the previous hour. For input to AERMOD, no adjustment should be made to the site specific wind data. AERMOD can produce model estimates for conditions when the wind speed may be less than 1 m/s but still greater than the instrument threshold.

If data are missing from the primary source, they should be handled as follows, in order of preference: (1) substitution of other representative on-site data; (2) linear interpolation of one or two missing hours; (3) substitution of representative off-site data; (4) use of a well-documented and justified imputation methodology; or (5) coding as a missing data field, according to the discussions in Section 4.8.3. The use of any data substitution technique should be thoroughly documented to provide the District or reviewing authority with all the information necessary to determine its approvability.

If the data processing recommendations in this section cannot be achieved, then alternative approaches should be discussed and developed in conjunction with the District or reviewing authority.

#### **4.8.6 *Quality Assurance and Control***

The purpose of quality assurance and maintenance is the generation of a representative amount (90% of hourly values for a year on a monthly basis) of valid data. For more information on data validation consult reference U.S. EPA (1995e). Maintenance may

be considered the physical activity necessary to keep the measurement system operating as it should. Quality assurance is the management effort to achieve the goal of valid data through plans of action and documentation of compliance with the plans.

Quality assurance (QA) will be most effective when following a QA Plan which has been signed-off by appropriate project or organizational authority. The QA Plan should contain the following information (paraphrased and particularized to meteorology from Lockhart):

1. Project description - how meteorology data are to be used
2. Project organization - how data validity is supported
3. QA objective - how QA will document validity claims
4. Calibration method and frequency - for data
5. Data flow - from samples to archived valid values
6. Validation and reporting methods - for data
7. Audits - performance and system
8. Preventive maintenance
9. Procedures to implement QA objectives - details
10. Management support - corrective action and reports

It is important for the person providing the quality assurance (QA) function to be independent of the organization responsible for the collection of the data and the maintenance of the measurement systems. Ideally, the QA auditor works for a separate company.

#### **4.9 Model Selection**

There are several air dispersion models that can be used to estimate pollutant concentrations and new ones are likely to be developed. U.S. EPA added AERMOD, which incorporates the PRIME downwash algorithm, to the list of preferred models in 2005 as a replacement to ISCST3. CalPuff was added in 2003. The latest version of the U.S. EPA recommended models can be found at the SCRAM Bulletin board located at <http://www.epa.gov/scram001>. However, any model, whether a U.S. EPA guideline model or otherwise, must be approved for use by the local air district. Recommended models and guidelines for using alternative models are presented in this section. All air dispersion models used to estimate pollutant concentrations for risk assessment analyses must be in the public domain. Classification according to terrain, source type and level of analysis is necessary before selecting a model (see Section 4.4). The selection of averaging times in the modeling analysis is based on the health effects of concern. Annual average concentrations are required for an analysis of carcinogenic or other chronic effects. One-hour maximum concentrations are required for analysis of acute effects.

##### **4.9.1 Recommended Models**

Recommended air dispersion models to estimate concentrations for risk assessment analyses are generally referenced in US EPA's Guideline on Air Quality Models

available at <http://www.epa.gov/scram001>. Currently AERMOD is recommended for most refined risk assessments in flat or complex terrain and in rural or urban environments<sup>1</sup>. In addition, CalPuff is available where spatial wind fields are highly variable or transport distances are large (e.g., 50 km). AERSCREEN is a screening model based on AERMOD. AERSCREEN can be used when representative meteorological data are unavailable. CTSCREEN is available for screening risk assessments in complex terrain. The most current version of the models should be used for risk assessment analysis. Some facilities may also require models capable of special circumstances such as dispersion near coastal areas. For more information on modeling special cases see Sections 4.12 and 4.13.

Most air dispersion models contain provisions that allow the user to select among alternative algorithms to calculate pollutant concentrations. Only some of these algorithms are approved for regulatory application such as the preparation of health risk assessments. The sections in this guideline that provide a description of each recommended model contain information on the specific switches and/or algorithms that must be selected for regulatory application.

To further facilitate the model selection, the District should be consulted for additional recommendations on the appropriate model(s) or a protocol submitted for District review and approval (see Section 4.14.1).

#### **4.9.2 Alternative Models**

Alternative models are acceptable if applicability is demonstrated or if they produce results identical or superior to those obtained using one of the preferred models referenced in Section 4.9.1. For more information on the applicability of alternative models refer to the following documents:

- U.S. EPA (2005). "Guideline on Air Quality Models" Section 3.2.2
- U.S. EPA (1992). "Protocol for Determining the Best Performing Model"
- U.S. EPA (1985a). "Interim Procedures for Evaluating Air Quality Models – Experience with Implementation"
- U.S. EPA (1984b). "Interim Procedures for Evaluating Air Quality Models (Revised)"

#### **4.10 Screening Air Dispersion Models**

A screening model may be used to provide a maximum concentration that is biased toward overestimation of public exposure. Use of screening models in place of refined modeling procedures is optional unless the District specifically requires the use of a refined model. Screening models are normally used when no representative meteorological data are available and may be used as a preliminary estimate to determine if a more detailed assessment is warranted.

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<sup>1</sup> AERMOD was promulgated by U.S. EPA as a replacement to ISCST3 on November 9, 2006.

Some screening models provide only 1-hour average concentration estimates. Other averaging periods can be estimated based on the maximum 1-hour average concentration in consultation and approval of the responsible air district. Because of variations in local meteorology, the exact factor selected may vary from one district to another. Table 4.2 provides guidance on the range and typical values applied. The conversion factors are designed to bias predicted longer term averaging periods towards overestimation.

**Table 4.2 Recommended Factors to Convert Maximum 1-hour Avg. Concentrations to Other Averaging Periods (U.S. EPA, 2011, 1995a; ARB, 1994).**

Averaging Time	Range	Typical SCREEN3 Recommended	AERSCREEN Recommended
3 hours	0.8 - 1.0	0.9	1.0
8 hours	0.5 - 0.9	0.7	0.9
24 hours	0.2 - 0.6	0.4	0.6
30 days	0.2 - 0.3	0.3	
Annual	0.06 - 0.1	0.08	0.1

AERSCREEN automatically provides the converted concentration for longer than 1-hour averaging periods. For area sources, the AERSCREEN 3, 8, and 24-hour average concentration are equal to the 1-hour concentration. No annual average concentration is calculated. SCREEN3 values are shown for comparison purposes.

#### **4.10.1 AERSCREEN**

The AERSCREEN (U.S. EPA, 2011) model is now available and should be used in lieu of SCREEN3 with approval of the local District. AERSCREEN is a screening level air quality model based on AERMOD. AERSCREEN does not require the gathering of hourly meteorological data. Rather, AERSCREEN requires the use of the MAKEMET program which generates a site specific matrix of meteorological conditions for input to the AERMOD model. MAKEMET generates a matrix of meteorological conditions based on local surface characteristics, ambient temperatures, minimum wind speed, and anemometer height.

AERSCREEN is currently limited to modeling a single point, capped stack, horizontal stack, rectangular area, circular area, flare, or volume source. More than one source may be modeled by consolidating the emissions into one emission source.

### 4.10.2 Valley Screening

The Valley model is designed to simulate a specific worst-case condition in complex terrain, namely that of a plume impaction on terrain under stable atmospheric conditions. The algorithms of the VALLEY model are included in other models such as SCREEN3 and their use is recommended in place of the VALLEY model. The usefulness of the VALLEY model and its algorithms is limited to pollutants for which only long-term average concentrations are required. For more information on the Valley model consult the user's guide (Burt, 1977).

#### 4.10.2.1 Regulatory Options

Regulatory application of the Valley model requires the setting of the following values during a model run:

- Class F Stability (rural) and Class E Stability (urban)
- Wind Speed = 2.5 m/s
- 6 hours of occurrence of a single wind direction (not exceeding a 22.5 deg sector)
- 2.6 stable plume rise factor

### 4.10.3 CTSCREEN

The CTSCREEN model (Perry et al., 1990) is the screening mode of the Complex Terrain Dispersion Model (CTDMPLUS). CTSCREEN can be used to model single point sources only. It may be used in a screening mode for multiple sources on a case by case basis in consultation with the District. CTSCREEN is designed to provide conservative, yet theoretically sounder, worst-case 1-hour concentration estimates for receptors located on terrain above stack height. Internally-coded time-scaling factors are applied to obtain other averages (see Table 4.3). These factors were developed by comparing the results of simulations between CTSCREEN and CTDMPLUS for a variety of scenarios and provide conservative estimates (Perry et al., 1990).

CTSCREEN produces identical results as CTDMPLUS if the same meteorology is used in both models. CTSCREEN accounts for the three-dimensional nature of the plume and terrain interaction and requires detailed terrain data representative of the modeling domain. A summary of the input parameters required to run CTSCREEN is given in Table 4.4. The input parameters are provided in three separate text files. The terrain topography file (TERRAIN) and the receptor information file (RECEPTOR) may be generated with a preprocessor that is included in the CTSCREEN package. In order to generate the terrain topography file the analyst must have digitized contour information.

**Table 4.3 Time-scaling factors internally coded in CTSCREEN**

Averaging Period	Scaling Factor
3 hours	0.7
24 hour	0.15
Annual	0.03

**Table 4.4 Input Parameters Required to Run CTSCREEN**

Parameter	File
Miscellaneous program switches	CTDM.IN
Site Latitude and Longitude (degrees)	CTDM.IN
Site TIME ZONE	CTDM.IN
Meteorology Tower Coordinates (user units)	CTDM.IN
Source Coordinates: x and y (user units)	CTDM.IN
Source Base Elevation (user units)	CTDM.IN
Stack Height (m)	CTDM.IN
Stack Diameter (m)	CTDM.IN
Stack Gas Temperature (K)	CTDM.IN
Stack Gas Exit Velocity (m/s)	CTDM.IN
Emission Rate (g/s)	CTDM.IN
Surface Roughness for each Hill (m)	CTDM.IN
Meteorology: Wind Direction (optional)	CTDM.IN
Terrain Topography	TERRAIN
Receptor Information (coordinates and associated hill number)	RECEPTOR

## 4.11 Refined Air Dispersion Models

Refined air dispersion models are designed to provide more representative concentration estimates than screening models. In general, the algorithms of refined models are more robust and have the capability to account for site-specific meteorological conditions. For more information regarding general aspects of model selection see Section 4.9.

### 4.11.1 *AERMOD*

For a wide variety of applications in all types of terrain, the recommended model is AERMOD. AERMOD is a steady-state plume dispersion model for assessment of pollutant concentrations from a variety of sources. AERMOD simulates transport and dispersion from multiple point, area, or volume sources based on an up-to-date characterization of the atmospheric boundary layer. Sources may be located in rural or urban areas and receptors may be located in simple or complex terrain. AERMOD accounts for building wake effects (i.e., plume downwash) based on the PRIME building downwash algorithms. The model employs hourly sequential preprocessed meteorological data to estimate concentrations for averaging times from one hour to one year (also multiple years). AERMOD is designed to operate in concert with two pre-processor codes: AERMET processes meteorological data for input to AERMOD, and AERMAP processes terrain elevation data and generates receptor information for input to AERMOD. Guidance on input requirements may be found in the AERMOD Users Guide.

#### 4.11.1.1 Regulatory Options

U.S. EPA regulatory application of AERMOD requires the selection of specific switches (i.e., algorithms) during a model run. All the regulatory options can be set by selecting the DFAULT keyword. The U.S. EPA regulatory options, automatically selected when the DFAULT keyword is used, are:

- Stack-tip downwash
- Incorporates the effects of elevated terrain
- Includes calms and missing data processing routines
- Does not allow for exponential decay for applications other than a 4-hour half life for SO<sub>2</sub>

Additional information on these options is available in the AERMOD User's Guide.

#### 4.11.1.2 Special Cases

- a. Building Downwash:  
AERMOD automatically determines if the plume is affected by the wake region of buildings when their dimensions are given. The specification of building dimensions does not necessarily mean that there will be downwash. See

Section 4.13.1 for guidance on how to determine when downwash is likely to occur.

b. Area Sources:

The area source algorithm in AERMOD estimates source emission strength by integrating an area upwind of the receptor location. Receptors may be placed within the area itself, downwind of the area or adjacent to the area. However, since the vertical distribution parameter ( $\sigma_z$ ) goes to zero as the downwind distance goes to zero, the plume function solution is infinite for a downwind receptor distance of zero. In order to avoid such singularity in the plume function solution, the AERMOD model arbitrarily sets the plume function to zero when the receptor distance is less than one meter. As a result, the area source algorithm will not provide reliable solutions for receptors located within or adjacent to very small areas, with dimensions on the order of a few meters across. In these cases, the receptor should be placed at least one meter outside of the area.

c. Volume Sources:

The volume source algorithms in AERMOD require an estimate of the initial distribution of the emission source. The initial distribution of emissions for a volume source is in the horizontal and vertical directions. When modeling volume source emissions, one needs to provide initial horizontal ( $\sigma_{y0}$ ) and vertical ( $\sigma_{z0}$ ) dimensions as accurate as possible so that pollutant buoyancy and dispersion are also calculated accurately. US EPA's AERMOD User Guide provides suggested procedures to estimate these initial dimensions based on source type (Table 3-1) (U.S. EPA, 2004a).

d. Line Sources:

Examples of line sources include conveyor belts or roads. Depending on the source, these can be modeled three ways; as a line source, as a series of volume sources, or as an elongated area source. Where the emission source is neutrally buoyant, such as a conveyor belt, AERMOD can be used according to the user guide. In the event that the line source is a roadway, then additional considerations are required.

At the present time, CALINE (CALINE3, CAL3QHCR, and CALINE4) is the only model dedicated to modeling the enhanced mechanical and thermal turbulence created by motor vehicles traveling on a roadway. Of these, CAL3QHCR is the only model that accepts hourly meteorological data and can estimate annual average concentrations. However, CALINE uses the Pasquill-Gifford stability categories which are used in the ISCST model. AERMOD is now the preferred plume model over ISCST3 with continuous plume dispersion calculations based on observations but AERMOD does not include the enhanced roadway turbulence. Therefore, in the case where roadway emissions dominate the risk assessment, it may be most important to simulate the enhanced thermal and mechanical turbulence from motor vehicles with the CAL3QHCR model.

In the case where roadway emissions are a subset of all emissions for the risk assessment, including roadway emissions along with facility emissions, it may be best to use AERMOD for all emissions, roadway and facility, in order to maintain continuity with one dispersion model for the risk assessment. If AERMOD is used, it is important to consider that a major freeway may act similar to a large building which can cause some mixing and therefore initial vertical dispersion. This dispersion could be estimated with sensitivity studies based on wind speed, wind angle, roadway orientation, roadway width, and etc. This could be a complex estimation and needs very adept modeling skills. Roadway modeling should be evaluated on a case-by-case basis in consultation with the District or the reviewing authority.

Line sources inputs include a composite fleetwide emission factor, roadway geometry, hourly vehicle activity (i.e., diurnal vehicle per hour pattern), hourly meteorological data, and receptor placement. For practical information on how to simulate roadway emissions using these models, see CAPCOA's website at <http://www.capcoa.org> or the Sacramento Metropolitan AQMD (SMAQMD) website at <http://www.airquality.org/ceqa/RoadwayProtocol.shtml>. The SMAQMD has a document titled, "Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways" (January, 2010).

- e. Complex Terrain:  
AERMOD uses the Dividing Streamline ( $H_c$ ) concept for complex terrain. Above  $H_c$ , the plume is assumed to be "terrain following" in the convective boundary layer. Below  $H_c$ , the plume is assumed to be "terrain impacting" in the stable boundary layer. AERMOD computes the concentration at any receptor as a weighted function between the two plume states (U.S. EPA, 2004b).
- f. Deposition:  
AERMOD contains algorithms to model settling and deposition and requires additional information to do so including particle size distribution. For more information consult the AERMOD User's Guide (U.S. EPA, 2004a).
- g. Diurnal Considerations:  
Systematic diurnal changes in atmospheric conditions are expected along the coast (or any large body of water) or in substantially hilly terrain. The wind speed and direction are highly dependent on time of day as the sun rises and begins to heat the Earth. The sun heats the surface of the land faster than the water surface. Therefore the air above the land warms up sooner than over water. This creates a buoyant effect of warm air rising over land and the cool air from over water moves in to fill the void. Near large bodies of water (e.g., the ocean) this is known as a sea breeze. In complex terrain this is known as upslope flow as the hot air follows the terrain upwards. When the sun sets and the surface of the land begins to cool, the air above also cools and creates a draining effect. Near the water this is the land breeze; in complex terrain this is known as downslope or drainage flow. In addition, for the sea breeze, the atmospheric

conditions change rapidly from neutral or stable conditions over water to unstable conditions over land.

Near the large bodies of water the sea breeze is typical in the afternoon and the land breeze is typical for the early morning before sunrise. In complex terrain upslope flow is typical in the afternoon, while drainage flow is typical at night. Diurnal profiles need to be evaluated in conjunction with the facility emissions since sources can have varied emission profiles (e.g., some sources are continuously emitting while others are intermittent). These intermittent emission profiles may be influenced by diurnal patterns; therefore, they need to be evaluated to properly estimate potential exposures. For these reasons, it is especially important to simulate facility emissions with a hourly diurnal pattern reflective of source activity so that the risk assessment is representative of daily conditions.

- h. 8-hour Modeling for the Offsite Worker's Exposure and Residential Exposure:  
If the ground level air concentrations from a facility operating 5 days a week, 8 hours per day have been estimated by a 24 hour per day annual average, an adjustment factor can be applied to estimate the air concentration that an offsite worker with the same schedule would be exposed to. The 24-hour annual average concentration is multiplied times 4.2.

If the meteorology during the time that the facility is emitting is used, hourly model simulations need to be post-processed to cull out the data needed for the offsite worker exposure. See Appendix M for information on how to calculate the refined offsite worker concentrations using the hourly raw results from the AERMOD air dispersion model. For more discussion on worker exposure, see Section 4.8.1.

Eight-hour exposure modeling can be used to evaluate the potential for health impacts (including effects of repeated exposures) in children and teachers exposed during school hours. Although not required in the HRA, 8-hour exposure modeling could also be performed at the discretion of the District to a residential scenario (i.e., the MEIR) where a facility operates only a portion of the day and exposure to residences are not adequately reflected by averaging concentrations over a 24 hour day.

#### 4.11.1.3 HARP Dispersion Analysis

It is highly recommended that air dispersion analysis be performed using the HARP software. HARP can perform refined dispersion analysis by utilizing the U.S. EPA standard program AERMOD. In the future, the updated version of HARP will link the AERMOD outputs with risk assessment modules.

#### **4.11.2 CTDMPPLUS**

CTDMPLUS is a Gaussian air quality model for use in all stability conditions in complex terrain. In comparison with other models, CTDMPPLUS requires considerably more

detailed meteorological data and terrain information that must be supplied using specifically designed preprocessors. CTDMPLUS was designed to handle up to 40 point sources.

#### **4.12 Modeling to Obtain Concentrations used for Various Health Impacts**

The following section outlines how emissions and air dispersion modeling results are used or adjusted for a receptor that is exposed to either a non-continuous or continuously emitting source.

##### **4.12.1 Emission Rates for Cancer, Chronic, and Acute Health Impacts**

As discussed in Section 4.2.1.1, the HRA should include both annual average emissions and maximum 1-hour emissions for each pollutant emitted by the facility. Maximum 1-hour emissions are used for acute noncancer health impacts while annual emissions are used for chronic exposures (i.e., chronic and 8-hour noncancer health impacts or cancer risk assessment). When applying the emission rates in the air dispersion analysis, it is important not to artificially inflate or deplete the reported emission inventory.

For annual average emissions, the emissions are spread evenly over the entire year for continuous emitting sources. However, for sources where the emission patterns vary (i.e., non-continuous emitting sources), the emission rate should also account for the facility's emission schedule. If appropriate, the variable emissions rate option (e.g., hour-of-day) should be used in the air dispersion analysis. For more information consult the AERMOD User's Guide (U.S. EPA, 2004a). Also, when calculating emission rates for acute health impacts, it is important the emission rates never exceed the reported maximum 1-hour emissions.

##### **4.12.2 Modeling and Adjustments for Inhalation Cancer Risk at a Worksite**

Modeled long-term averages are typically used for cancer risk assessments for residents and workers. In an inhalation cancer risk assessment for an offsite worker, the long-term average should represent what the worker breathes during their work shift. However, the long-term averages calculated from AERMOD typically represent exposures for receptors that were present 24 hours a day and seven days per week (i.e., the schedule of a residential receptor). To estimate the offsite worker's concentration, there are two approaches. The more refined, complex, and time consuming approach is to post-process the hourly raw dispersion model output and examine the hourly concentrations that fall within the offsite worker's shift. See Appendix M for information on how to simulate the long-term concentration for the offsite worker that can be used to estimate inhalation cancer risk.

In lieu of post-processing the hourly dispersion model output, the more typical approach is to obtain the long-term average concentration as you would for modeling a residential receptor and approximate the worker's inhalation exposure using an adjustment factor. The actual adjustment factor that is used to adjust the concentration may differ from the example below based on the specifics of the source and worker receptor

(e.g., work-shift overlap). Once the worker's inhalation concentration is determined, the inhalation dose is calculated using additional exposure frequency and duration adjustments. See Chapter 5 for more information on the inhalation dose equation.

#### 4.12.2.1 Non-Continuous Sources

When modeling a non-continuously emitting source (e.g., operating for eight hours per day and five days per week), the modeled long-term average concentrations are based on 24 hours a day and seven days per week for the period of the meteorological data set. Even though the emitting source is modeled using a non-continuous emissions schedule, the long-term concentration is still based on 24 hours a day and seven days per week. Thus, this concentration includes the zero hours when the source was not operating. For the offsite worker inhalation risk, we want to determine the long-term concentration the worker is breathing during their work shift. Therefore, the long-term concentration needs to be adjusted so it is based only on the hours when the worker is present. For example, assuming the emitting source and worker's schedules are the same, the adjustment factor is  $4.2 = (24 \text{ hours per day} / 8 \text{ hours per shift}) \times (7 \text{ days in a week} / 5 \text{ days in a work week})$ . In this example, the long term residential exposure is adjusted upward to represent the exposure to a worker. Additional concentration adjustments may be appropriate depending on the work shift overlap. These adjustments are discussed below.

The calculation of the adjustment factor from a non-continuous emitting source is summarized in the following steps.

- a. Obtain the long-term concentrations from air dispersion modeling as is typical for residential receptors (all hours of a year for the entire period of the meteorological data set).
- b. Determine the coincident hours per day and days per week between the source's emission schedule and the offsite worker's schedule.
- c. Calculate the worker adjustment factor (WAF) using Equation 4.1. When assessing inhalation cancer health impacts, a discount factor (*DF*) may also be applied if the offsite worker's schedule partially overlaps with the source's emission schedule. The discount factor is based on the number of coincident hours per day and days per week between the source's emission schedule and the offsite worker's schedule (see Equation 4.2). The *DF* is always less than or equal to one.

Please note that worker adjustment factor does not apply if the source's emission schedule and the offsite worker's schedule do not overlap. Since the worker is not present during the time that the source is emitting, the worker is not exposed to the source's emission (i.e., the *DF* in Equation 4.2 becomes 0).

$$WAF = \frac{H_{residential}}{H_{source}} \times \frac{D_{residential}}{D_{source}} \times DF \quad \text{Eq. 4.1}$$

Where:

$WAF$  = the worker adjustment factor

$H_{residential}$  = the number of hours per day the long-term residential concentration is based on (always 24 hours)

$H_{source}$  = the number of hours the source operates per day

$D_{residential}$  = the number of days per week the long-term residential concentration is based on (always 7 days)

$D_{source}$  = the number of days the source operates per week

$DF$  = a discount factor for when the offsite worker's schedule partially overlaps the source's emission schedule. Use 1 if the offsite worker's schedule occurs within the source's emission schedule. If the offsite worker's schedule partially overlaps with the source's emission schedule, then calculate the discount factor using Equation 4.2 below.

$$DF = \frac{H_{coincident}}{H_{worker}} \times \frac{D_{coincident}}{D_{worker}} \quad \text{Eq. 4.2}$$

Where:

$DF$  = the discount factor for assessing cancer impacts

$H_{coincident}$  = the number of hours per day the offsite worker's schedule and the source's emission schedule overlap

$D_{coincident}$  = the number of days per week the offsite worker's schedule and the source's emission schedule overlap

$H_{worker}$  = the number of hours the offsite worker works per day

$D_{worker}$  = the number of days the offsite worker works per week

- d. The final step is to estimate the offsite worker's inhalation concentration by multiplying the worker adjustment factor with the long-term residential concentration. The worker's concentration is then plugged into the dose equation and risk calculation.

The HARP software has the ability to calculate worker impacts using an approximation factor and, in the future, it will have the ability to post-process refined worker concentrations using the hourly raw results from an air dispersion analysis.

#### 4.12.2.2 Continuous Sources

If the source is continuously emitting, then the worker is assumed to breathe the long-term annual average concentration during their work shift. Equation 4.1 becomes one and no concentration adjustments are necessary in this situation when estimating the inhalation cancer risk. Note however, if an assessor does not wish to apply the assumption the worker breathes the long-term annual average concentration during the work shift, then a refined concentration can be post-processed as described in Appendix M. All alternative assumptions should be approved by the reviewing authority and supported in the presentation of results.

#### 4.12.3 **Modeling and Adjustments for Noncancer 8-Hour RELs**

For 8-hour noncancer health impacts, we evaluate if the receptor (e.g., worker or resident) is exposed to an 8 hour average concentration, occurring daily, that exceeds the 8-hour REL. The 8 hour RELs were derived primarily for the offsite worker scenario. Although not required in an HRA, residential receptors can be evaluated with an 8-hour

REL at the discretion of the District or Reviewing authority. For ease, we use a worker receptor in this discussion and in the discussion below for a non-continuously emitting source. The daily average concentration is intended to represent the long-term average concentration the worker is breathing during the work shift. In general, there are two approaches for estimating the concentration used for the 8-hour hazard index. The more refined, complex, and time consuming approach is to post-process the hourly dispersion model output and use only the hourly concentrations that are coincident with the offsite worker hours to obtain the long-term concentration. See Appendix M for information on how to simulate the daily average concentration through air dispersion modeling.

Before proceeding through a refined analysis described in Appendix M, the assessor may wish to approximate the long-term concentration, as described below, and calculate the 8-hour hazard index. In lieu of post-processing the hourly dispersion model output described in Appendix M, the more typical approach is to obtain the long-term average concentration as you would for modeling a residential receptor and approximate the worker's inhalation concentration using an adjustment factor. The method for applying the adjustment factor is described in the section below.

The results from the 8-hour hazard index calculations should not be combined with the chronic or acute hazard indices. Each of the potential noncancer health impacts should be reported independently. See Chapter 8 for more discussion on calculating health impacts.

#### 4.12.3.1 Non-Continuous Sources

When modeling a non-continuously emitting source (e.g., operating for eight hours per day and five days per week), the modeled long-term average concentrations are based on 24 hours a day and seven days per week for the period of the meteorological data set. Even though the emitting source is modeled using a non-continuous emissions schedule, the long-term concentration is still based on 24 hours a day and seven days per week. Thus, this concentration includes the zero hours when the source was not operating. For the offsite worker 8-hour hazard index, we want to determine the long-term average daily concentration the worker may be breathing during their work shift. This is similar to the cancer approximation adjustment method with one difference; there is no adjustment for partial overlap between the worker's schedule and the source's emission schedule. The reason for this difference in methodology is because the 8-hour REL health factors are designed for repeated 8-hour exposures and cannot readily be adjusted to other durations of exposure. The 8-hour RELs should be used for typical daily work shifts of 8-9 hours. For further questions, assessors should contact OEHHA, the District, or reviewing authority to determine if the 8-hour RELs should be used in your HRA. Any discussions or directions to exclude the 8-hour REL evaluation should be documented in the HRA.

When calculating the long-term average daily concentration for the 8-hour REL comparison, the long-term residential concentration needs to be adjusted so it is based only on the operating hours of the emitting source with the assumption the offsite

worker's shift falls within the emitting source's schedule. For example, assuming the emitting source operates 8 hours per day, 5 days per week and the offsite worker's schedule falls anywhere within this period of emissions, then the adjustment factor is  $4.2 = (24 \text{ hours per day} / 8 \text{ hours of emissions per day}) \times (7 \text{ days in a week} / 5 \text{ days of emissions per week})$ . In this example, the long term residential exposure is adjusted upward to represent the 8-hour exposure to a worker. No adjustments are applied for partial work shift overlap with the emitting source. If the source emits at night, then see Appendix N for additional recommendations.

Using the approximation factor is a screening method. If the 8-hour hazard index is above a threshold of concern with this method, the district or assessor should contact OEHHA for further guidance regarding the substance of concern. If necessary, further evaluation can be performed using the refined daily average modeling methodology discussed in Appendix M.

The calculation of the adjustment factor from a non-continuous emitting source is summarized in the following steps.

- b. Obtain the long-term concentrations from air dispersion modeling as is typical for residential receptors (all hours of a year for the entire period of the meteorological data set).
- c. Calculate the worker adjustment factor (WAF) using Equation 4.3. The source's emission schedule is assumed to overlap offsite worker's schedule. Note that the worker adjustment factor and the 8-hour inhalation REL do not apply if the source's emission schedule and the offsite worker's schedule do not overlap at some point.

$$WAF = \frac{H_{residential}}{H_{source}} \times \frac{D_{residential}}{D_{source}} \quad \text{Eq. 4.3}$$

Where:

$WAF$  = the worker adjustment factor

$H_{residential}$  = the number of hours per day the long-term residential concentration is based on (always 24 hours)

$H_{source}$  = the number of hours the source operates per day

$D_{residential}$  = the number of days per week the long-term residential concentration is based on (always 7 days).

$D_{source}$  = the number of days the source operates per week.

- d. The final step is to estimate the offsite worker's daily average inhalation concentration by multiplying the WAF with the long-term residential concentration. The worker's concentration is then used to calculate the 8-hour hazard index. This method using the approximation factor is a screening method. If the 8-hour hazard index is above a threshold of concern, the district or assessor should contact OEHHA for further guidance regarding the substance of concern.

In the future, the HARP software will have the ability to use 8-hour RELs, calculate worker impacts using an approximation factor, and to post-process worker concentrations using the hourly raw results from an air dispersion analysis.

#### 4.12.3.2 Continuous Sources

If the source is continuously emitting, then the worker is assumed to breathe the long-term annual average concentration during their work shift and no concentration adjustments are made when estimating 8-hour health impacts. Note however, if an assessor does not wish to assume the worker breathes the long-term annual average concentration during the work shift, then a refined concentration can be post-processed as described in Appendix M. All alternative assumptions should be approved by the reviewing authority and supported in the presentation of results.

Note that 8-hour RELs are not typically used for continuously emitting sources for residential receptors. In this situation it is only necessary to estimate a chronic Hazard Index using the annual average concentrations and chronic RELs. However, there may be situations where the District may wish to assess an 8-hour Hazard Index, for example, where there are significant differences in modeled concentration of emissions during the day due to diurnal wind patterns.

#### **4.12.4 Modeling and Adjustment Factors for Noncancer Chronic RELs**

Potential chronic noncancer health impacts use the long-term annual average concentration regardless of the emitting facility's schedule. No adjustment factors should be used to adjust this concentration. Chronic RELs are used to assess not only residential health impacts, but in many cases worker health impacts as well. There are currently only a limited number of substances with an 8-hour inhalation REL, and a facility may emit only, or mostly, substances that currently have just a chronic REL. Until there are 8-hour RELs for all the Hot Spots substances emitted from a specified facility, we recommend determining the chronic HI for the MEIW to adequately protect the offsite worker.

The results from the chronic hazard index calculations are not combined with the 8-hour or acute hazard indices. All potential noncancer results should be reported independently. See Chapter 8 for more discussion on calculating health impacts.

#### **4.12.5 Modeling and Adjustments for Oral Cancer Potencies and Oral RELs**

When estimating the cancer risk or noncancer health impacts from noninhalation pathways, no adjustment is made to the long-term annual average concentration regardless of the emitting facility's schedule. Since the media (e.g., soil) at the receptor location where deposition takes place for noninhalation pathways is continuously present, the concentrations used for all noninhalation pathways are not adjusted (up or down) by an adjustment factor. However, some adjustments are made to the concentration once the pollutants reach the media, for example, pollutants undergo decay in soils. In addition, when the dose for each pathway is calculated, exposure adjustments may also be made. See Chapter 5 of this document and the Technical

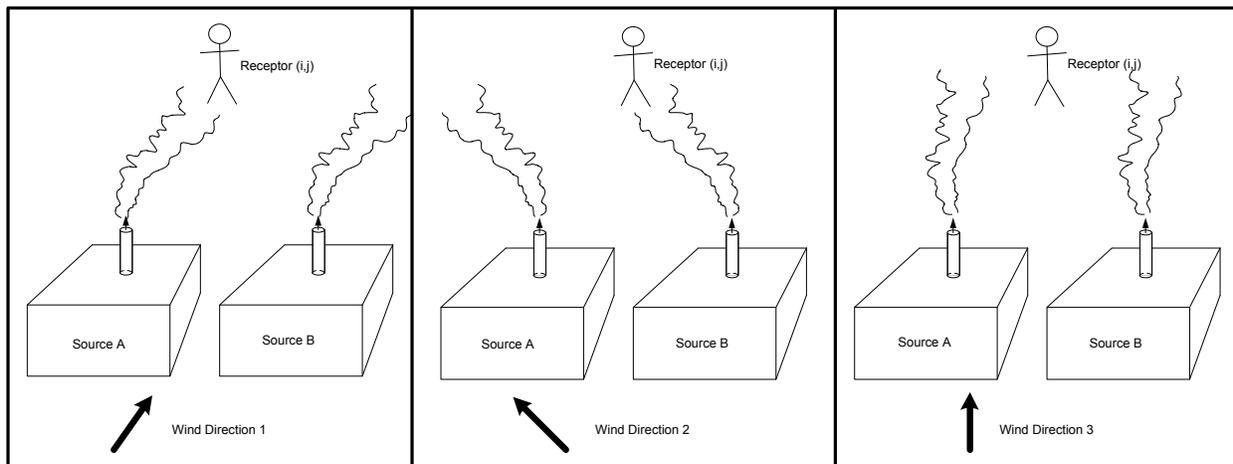
Support Document for Exposure Assessment and Stochastic Analysis (OEHHA, 2012) to get more information on these types of adjustments. Oral cancer potencies and oral RELs are used to assess both residential or worker health impacts.

#### **4.12.6 Modeling One-Hour Concentrations using Simple and Refined Acute Calculations**

Modeled one-hour concentrations are needed for the acute health hazard index calculations. HARP has two methods to calculate this concentration: Simple and Refined. As an aid to understanding the differences between Simple and Refined, Figure 2 shows three possible conditions showing how wind direction may vary and impact a downwind receptor (i,j) differently from just two sources (A and B).

For the Simple calculation, HARP stores only the maximum one-hour concentration at each receptor (i,j) from each source (A and B) as the dispersion model marches down each hour of the simulation (e.g., one to five years of hourly data). At the end of the simulation period, HARP reports back only the maximum impacts at each receptor from each source regardless of which hour of the simulation period this occurred. For example, the Simple Maximum Acute Impacts would be the summation of Source A impacts from Wind Direction 1 and Source B impacts from Wind Direction 2 as shown in Figure 2.

For the Refined simulation, HARP stores each hourly concentration at each receptor (i,j) from each source. At the end of the simulation period, HARP evaluates the coincident impact at each receptor from all sources for each hour of the simulation period. In this case the maximum impacts will be identified by a particular hour of the period with associated wind speed, direction, and atmospheric conditions. For example, the Refined Maximum Acute impact from Sources A and B on receptor (i,j) could be from any wind direction (1,2, or 3) as shown in Figure 2. Since HARP stores all simulations for all sources – at all receptors – for all hours to calculate the refined impacts, there is great potential to fill large amounts of disk storage space. The Refined simulation provides a more representative picture of the maximum acute hazard index from a facility. The Simple calculation will provide an upper bound to the acute hazard index.

**Figure 2 Acute Scenarios**

### 4.13 Modeling Special Cases; Specialized Models

Special situations arise in modeling some sources that require considerable professional judgment; a few are outlined below. It is recommended that the reader consider retaining professional consultation services if the procedures are unfamiliar. The following sections, taken mostly from the document “On-Site Meteorological Program Guidance for Regulatory Modeling Applications” (U.S. EPA, 1995e), provide general information on data formats and representativeness. Some Districts may have slightly different recommendations from those given here.

#### 4.13.1 Building Downwash

The entrainment of a plume in the wake of a building can result in the “downwash” of the plume to the ground. This effect can increase the maximum ground-level concentration downwind of the source. Therefore, stack sources must be evaluated to determine whether building downwash is a factor in the calculation of maximum ground-level concentrations.

The PRIME algorithm, included with AERMOD, has several advances in modeling building downwash effects including enhanced dispersion in the wake, reduced plume rise due to streamline deflection and increased turbulence, and continuous treatment of the near and far wakes (Schulman, 2000).

Complicated situations involving more than one building may necessitate the use of the Building Profile Input Program (BPIP) which can be used to generate the building dimension section of the input file of the ISC models (U.S. EPA, 1993). The BPIP program calculates each building’s direction-specific projected width. The Building Profile Input Program for PRIME (BPIP-PRM) is the same as BPIP but includes an algorithm for calculating downwash values for input into the PRIME algorithm which is contained in such models as AERMOD. The input structure of BPIP-PRM is the same as that of BPIP.

### **4.13.2 Deposition**

There are two types of deposition: wet deposition and dry deposition. Wet deposition is the incorporation of gases and particles into rain-, fog- or cloud water followed by a precipitation event and also rain scavenging of particles during a precipitation event. Wet deposition of gases is therefore more important for water soluble chemicals; particles (and hence particle-phase chemicals) are efficiently removed by precipitation events (Bidleman, 1988). Dry deposition refers to the removal of gases and particles from the atmosphere.

In the Air Toxics “Hot Spots” program, deposition is quantified for particle-bound pollutants and not gases. Wet deposition of water-soluble gas phase chemicals is thus not considered. When calculating pollutant mass deposited to surfaces without including depletion of pollutant mass from the plume, airborne concentrations remaining in the plume and deposition to surfaces can be overestimated, thereby resulting in overestimates of both the inhalation and multi-pathway risk estimates. However, neglecting deposition in the air dispersion model, while accounting for it in the multipathway health risk assessment, is a conservative, health protective approach (CAPCOA, 1987; Croes, 1988). Misapplication of plume depletion can also lead to possible underestimates of multi-pathway risk and for that reason no depletion is the default assumption. If plume depletion is incorporated, then some consideration for possible resuspension is warranted. An alternative modeling methodology accounting for plume depletion can be discussed with the Air District and used in an approved modeling protocol.

Although not generally used, several air dispersion models can provide downwind concentration estimates that take into account the upwind deposition of pollutants to surfaces and the consequential reduction of mass remaining in the plume. Air dispersion models having deposition and plume depletion algorithms require particle distribution data that are not always readily available. These variables include particle size, mass fraction, and density for input to AERMOD. In addition, the meteorological fields need to include additional parameters including relative humidity, precipitation, cloud cover, and surface pressure. Consequently, depletion of pollutant mass from the plume often is not taken into account.

In conclusion, multipathway risk assessment analyses normally incorporate deposition to surfaces in a screening mode, specifically by assigning a default deposition velocity of 2 cm/s for controlled sources and 5 cm/s for uncontrolled sources in lieu of actual measured size distributions (ARB, 1989). For particles (and particle-phase chemicals), the deposition velocity depends on particle size and is minimal for particles of diameter approximately 0.1-1 micrometer; smaller and larger particles are removed more rapidly.

### **4.13.3 Short Duration Emissions**

Short-duration emissions (i.e., much less than an hour) require special consideration. In general, “puff models” provide a better characterization of the dispersion of pollutants having short-duration emissions. Continuous Gaussian plume models have traditionally

been used for averaging periods as short as about 10 minutes and are not recommended for modeling sources having shorter continuous emission duration.

#### **4.13.4 Fumigation**

Fumigation occurs when a plume that was originally emitted into a stable layer in the atmosphere is mixed rapidly to ground-level when unstable air below the plume reaches plume level. Fumigation can cause very high ground-level concentrations. Typical situations in which fumigation occurs are:

- Breaking up of a nocturnal radiation inversion by solar warming of the ground surface (rising warm unstable air); note that the break-up of a nocturnal radiation inversion is a short-lived event and should be modeled accordingly.
- Shoreline fumigation caused by advection of pollutants from a stable marine environment to an unstable inland environment
- Advection of pollutants from a stable rural environment to a turbulent urban environment

SCREEN3 incorporates concentrations due to inversion break-up and shoreline fumigation and is limited to maximum hourly evaluations. The Offshore and Coastal Dispersion Model incorporates overwater plume transport and dispersion as well as changes that occur as the plume crosses the shoreline – hourly meteorological data are needed from both offshore and onshore locations.

#### **4.13.5 Raincap on Stack**

The presence of a raincap or any obstacle at the top of the stack hinders the momentum of the exiting gas. The extent of the effect is a function of the distance from the stack exit to the obstruction and of the dimensions and shape of the obstruction.

On the conservative side, the stack could be modeled as having a non-zero, but negligible exiting velocity, effectively eliminating any momentum rise. Such an approach would result in final plume heights closer to the ground and therefore higher concentrations nearby. There are situations where such a procedure might lower the actual population-dose and a comparison with and without reduced exit velocity should be examined.

Plume buoyancy is not strongly reduced by the occurrence of a raincap. Therefore, if the plume rise is dominated by buoyancy, it is not necessary to adjust the stack conditions. (The air dispersion models determine plume rise by either buoyancy or momentum, whichever is greater.)

The stack conditions should be modified when the plume rise is dominated by momentum and in the presence of a raincap or a horizontal stack. Sensitivity studies with the SCREEN3 model, on a case-by-case basis, can be used to determine whether

plume rise is dominated by buoyancy or momentum. The District should be consulted before applying these procedures.

- Set exit velocity to 0.001 m/sec
- Turn stack tip downwash off
- Reduce stack height by 3 times the stack diameter

Stack tip downwash is a function of stack diameter, exit velocity, and wind speed. The maximum stack tip downwash is limited to three times the stack diameter in the AERMOD air dispersion model. In the event of a horizontal stack, stack tip downwash should be turned off and no stack height adjustments should be made. Note: This approach may not be valid for large (several meter) diameter stacks.

An alternative, more refined, approach could be considered for stack gas temperatures which are slightly above ambient (e.g., ten to twenty degrees Fahrenheit above ambient). In this approach, the buoyancy and the volume of the plume remain constant and the momentum is minimized.

- Turn stack tip downwash off
- Reduce stack height by 3 times the stack diameter ( $3D_o$ )
- Set the stack diameter ( $D_b$ ) to a large value (e.g., 10 meters)
- Set the stack velocity to  $V_b = V_o (D_o/D_b)^2$

Where  $V_o$  and  $D_o$  are the original stack velocity and diameter and  $V_b$  and  $D_b$  are the alternative stack velocity and diameter for constant buoyancy. This approach is advantageous when  $D_b \gg D_o$  and  $V_b \ll V_o$  and should only be used with District approval.

In the presence of building downwash and in the event that PRIME downwash is being utilized in AERMOD, an alternative approach is recommended. PRIME algorithms use the stack diameter to define initial plume radius and to solve conservation laws. The user should input the actual stack diameter and exit temperature but set the exit velocity to a nominally low value (e.g., 0.001 m/s). Also since PRIME does not explicitly consider stack-tip downwash, no adjustments to stack height should be made.

Currently U.S. EPA is BETA testing options for capped and horizontal releases in AERMOD. It is expected that these options will replace the above guidance when BETA testing is complete.

#### **4.13.6 Landfill Sites**

Landfills should be modeled as area sources. The possibility of non-uniform emission rates throughout the landfill area should be investigated. A potential cause of non-uniform emission rates would be the existence of cracks or fissures in the landfill cap (where emissions may be much larger). If non-uniform emissions exist, the landfill should be modeled with several smaller areas assigning an appropriate emission factor to each one of them, especially if there are nearby receptors (distances on the same order as the dimensions of the landfill).

#### 4.14 Specialized Models

Some models have been developed for application to very specific conditions. Examples include models capable of simulating sources where both land and water surfaces affect the dispersion of pollutants and models designed to simulate emissions from specific industries.

##### 4.14.1 *Buoyant Line and Point Source Dispersion Model (BLP)*

BLP is a Gaussian plume dispersion model designed for the unique modeling problems associated with aluminum reduction plants, and other industrial sources where plume rise and downwash effects from stationary line sources are important.

###### 4.14.1.1 Regulatory Application

Regulatory application of BLP model requires the selection of the following options:

- rural (IRU=I) mixing height option;
- default (no selection) for all of the following: plume rise wind shear (LSHEAR), transitional point source plume rise (LTRANS), vertical potential temperature gradient (DTHTA), vertical wind speed power law profile exponents (PEXP), maximum variation in number of stability classes per hour (IDELS), pollutant decay (DECFA), the constant in Briggs' stable plume rise equation (CONST2), constant in Briggs' neutral plume rise equation (CONST3), convergence criterion for the line source calculations (CRIT), and maximum iterations allowed for line source calculations (MAXIT); and
- terrain option (TERAN) set equal to 0.0, 0.0, 0.0, 0.0, 0.0, 0.0.

For more information on the BLP model consult the user's guide (Schulman and Scire, 1980).

##### 4.14.2 *Offshore and Coastal Dispersion Model (OCD)*

OCD (DiCristofaro and Hanna, 1989) is a straight-line Gaussian model developed to determine the impact of offshore emissions from point, area or line sources on the air quality of coastal regions. OCD incorporates "over-water" plume transport and dispersion as well as changes that occur as the plume crosses the shoreline. Hourly meteorological data are needed from both offshore and onshore locations. Additional data needed for OCD are water surface temperature, over-water air temperature, mixing height, and relative humidity.

Some of the key features include platform building downwash, partial plume penetration into elevated inversions, direct use of turbulence intensities for plume dispersion, interaction with the overland internal boundary layer, and continuous shoreline fumigation.

#### 4.14.2.1 Regulatory Application

OCD has been recommended for use by the Minerals Management Service for emissions located on the Outer Continental Shelf (50 FR 12248; 28 March 1985). OCD is applicable for over-water sources where onshore receptors are below the lowest source height. Where onshore receptors are above the lowest source height, offshore plume transport and dispersion may be modeled on a case-by-case basis in consultation with the District.

#### **4.14.3 *Shoreline Dispersion Model (SDM)***

SDM (PEI, 1988) is a hybrid multipoint Gaussian dispersion model that calculates source impact for those hours during the year when fumigation events are expected using a special fumigation algorithm and the MPTER regulatory model for the remaining hours.

SDM may be used on a case-by-case basis for the following applications:

- tall stationary point sources located at a shoreline of any large body of water;
- rural or urban areas;
- flat terrain;
- transport distances less than 50 km;
- 1-hour to 1-year averaging times.

#### **4.15 Interaction with the District**

The risk assessor must contact the District to determine if there are any specific requirements. Examples of such requirements may include, but are not limited to: specific receptor location guidance, specific usage of meteorological data, and specific report format (input and output). See Chapter 9 for more information on the format and content of modeling protocols and HRAs.

##### **4.15.1 *Submittal of Modeling Protocol***

It is strongly recommended that a modeling protocol be submitted to the District for review and approval prior to extensive analysis with an air dispersion model. The modeling protocol is a plan of the steps to be taken during the air dispersion modeling process. Following is an example of the format that may be followed in the preparation of the modeling protocol. **Consult with the District to confirm format and content requirements or to determine the availability of District modeling guidelines before submitting the protocol.**

## **Outline for a Modeling Protocol**

### ***I. Introduction***

***Include the facility name, address, and a brief overview describing the facility's operations.***

- Provide a description of the terrain and topography surrounding the facility and potential receptors.
- Indicate the format in which data will be provided. Ideally, the report and summary of data will be on paper and all data and model input and output files will be provided electronically (e.g., compact disk or CD).
- Identify the guidelines used to prepare the protocol (e.g., District Guidelines).

### ***II. Emissions***

***For each pollutant and process whose emissions are required to be quantified in the HRA, list the annual average emissions (pounds/year and grams/second) and the maximum one-hour emissions (pounds/hour and grams/second)<sup>2</sup>. Maximum 1-hour emissions are used for acute noncancer health impacts while annual emissions are used for chronic exposures (i.e., chronic and 8-hour noncancer health impacts or cancer risk assessment).***

- Identify the reference and method(s) used to determine emissions (e.g., source tests, emission factors, etc.). Clearly indicate any emission data that are not reflected in the previously submitted emission inventory report. In this event, a revised emission inventory report will need to be submitted to the District.
- Identify if this will be a multipathway assessment based on emitted substances.

### ***III. Models / Modeling Assumptions***

***Specify the model and modeling assumptions***

- Identify the model(s) to be used, including the version number.
- Identify the model options that will be used in the analysis.

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<sup>2</sup> Except radionuclides, for which annual and hourly emissions are reported in Curies/year and millicuries/hour, respectively.

- Identify the modeling domain(s) and the spacing of receptor grid(s). Grid spacing should be sufficient in number and detail to capture the concentration at all of the receptors of interest.
- Indicate complex terrain options that may be used, if applicable.
- Identify the source type(s) that will be used to represent the facility's operations (e.g., point, area, or volume sources, flare options or other).
- Indicate the preliminary source characteristics (e.g., stack height, gas temperature, exit velocity, dimensions of volume source, etc.).
- Identify and support the use of urban or rural dispersion coefficients for those models that require dispersion coefficients. For other models, identify and support the parameters required to characterize the atmospheric dispersion due to land characteristics (e.g., surface roughness, Monin-Obukhov length).

#### **IV. Meteorological Data**

***Specify the type, source, and year(s) of hourly meteorological data (e.g., hourly surface data, upper air mixing height information).***

- State how the data are representative for the facility site.
- Describe QA/QC procedures.
- Identify any gaps in the data; if gaps exist, describe how the data gaps are filled.

#### **V. Deposition**

- Specify the method to calculate deposition (if applicable).

#### **VI. Receptors**

***Specify the type and location of receptors. Include all relevant information describing how the individual and population-related receptors will be evaluated.***

- Identify and describe the location(s) of known or anticipated potential sensitive receptors, the point of maximum impact (PMI), and the maximum exposed individual residential (MEIR) and worker (MEIW) receptors. Identify any special considerations or grids that will be used to model these receptors. This information should correspond with information provided in Section III (e.g., fine receptor spacing of 20 meters at the fence line and centered on the maximum impacts; coarse receptor spacing of 100 meters out to 2,000 meters; extra coarse spacing of 1,000 meters out to 20,000 meters).

- Identify if spatial averaging will be used. Include necessary background information on each receptor including how the domain and spacing will be determined for each receptor or exposure pathway.
- Describe how the cancer burden or population impact estimates are calculated. Clarify the same information for the presentation of noncancer population impacts (e.g., centroids of the census tracts in the area within the zone of impact).
- Specify that actual UTM coordinates and the block/street locations (i.e., north side of 3,000 block of Smith Street), where possible, will be provided for specified receptor locations.
- Identify and support the use of any exposure adjustments (e.g., time a location, diurnal).
- Include the list of anticipated exposure pathways that will be included and indicate which substance will be evaluated in the multipathway assessment. Identify if sensitive receptors are present and which receptors will be evaluated in the HRA.

## **VII. Maps**

### ***Identify how the information will be graphically presented.***

- Indicate which cancer risk isopleths will be plotted for the cancer zone of impact (e.g.,  $10^{-7}$ ,  $10^{-6}$  see Section 4.6.1).
- Indicate the hazard quotients or hazard indices to be plotted for the noncancer acute, 8 hour, and chronic zones of impact (e.g., 0.5, 1.0, etc.).

## **4.16 Health Risk Assessment Report**

This section describes the information related to the air dispersion modeling process that needs to be reported in the risk assessment. This section is also presented in Chapter 9, Summary of the Requirements for a Modeling Protocol and a Health Risk Assessment Report, in Section 9.2. The District may have specific requirements regarding format and content (see Section 4.15). Sample calculations should be provided at each step to indicate how reported emissions data were used. Reviewing agencies must receive input, output, and supporting files of various model analyses on computer-readable media (e.g., CD).

### **4.16.1 Information on the Facility and its Surroundings**

Report the following information regarding the facility and its surroundings:

- Facility Name

- Location (UTM coordinates and street address)
- Land use type (see Section 2.4)
- Local topography
- Facility plot plan identifying:
  - source locations
  - property line
  - horizontal scale
  - building heights
  - emission sources

#### **4.16.2 Source and Emission Inventory Information<sup>3</sup>**

##### **4.16.2.1 Release Parameters**

Report the following information for each release location in table format:

- Release location identification number
- Release name
- Release type (e.g., point, volume, area, line, pit, etc.)
- Source identification number(s) used by the facility that emit out of this release location
- Release location using UTM coordinates
- Release parameters by release type (e.g., shown for point source):
  - Stack height (m), stack diameter (building dimensions for downwash), exhaust gas exit velocity (m/s), exhaust gas volumetric flow rate (ACFM), exhaust gas exit temperature (K), etc.

##### **4.16.2.2 Source Description and Operating Schedule**

The description and operating schedule for each source should be reported in table form including the following information:

- Source identification number used by the facility
- Source name
- Number of operating hours per day and per year (e.g., 0800-1700, 2700 hr/yr)
- Number of operating days per week (e.g., Mon-Sat)
- Number of operating days or weeks per year (e.g., 52 wk/yr excluding major holidays)
- Release point identification number(s) for where source emissions are released

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<sup>3</sup> Health and Safety Code section 44346 authorizes facility operators to designate certain "Hot Spots" information as trade secret. Section 44361(a) requires districts to make health risk assessments available for public review upon request. Section 44346 specifies procedures to be followed upon receipt of a request for the release of trade secret information. See also the Inventory Guidelines Report regarding the designation of trade secret information in the Inventory Reports.

- Fraction of source emissions emitted at each release point by release point ID number

#### 4.16.2.3 Emission Control Equipment and Efficiency

Report emission control equipment and efficiency by source and by substance

#### 4.16.2.4 Emissions Data Grouped By Source

Report emission rates for each toxic substance, grouped by source (i.e., emitting device or process identified in Inventory Report), in table form including the following information:

- Source name
- Source identification number
- Substance name and CAS number (from Inventory Guidelines)
- Annual average emissions for each substance (lb/yr)
- Hourly maximum emissions for each substance (lb/hr)

#### 4.16.2.5 Emissions Data Grouped by Substance

Report facility total emission rate by substance for all emitted substances listed in the Air Toxics "Hot Spots" Program including the following information:

- Substance name and CAS number (from Inventory Guidelines)
- Annual average emissions for each substance (lb/yr)
- Hourly maximum emissions for each substance (lb/hr)

#### 4.16.2.6 Emission Estimation Methods

Report the methods used in obtaining the emissions data indicating whether emissions were measured or estimated. Clearly indicate any emission data that are not reflected in the previously submitted emission inventory report and submit a revised emission inventory report to the district. A reader should be able to reproduce the risk assessment without the need for clarification.

#### 4.16.2.7 List of Substances

Include tables listing all "Hot Spots" Program substances which are emitted, plus any other substances required by the District. Indicate substances to be evaluated for cancer risks and noncancer health impacts.

### **4.16.3 *Exposed Population and Receptor Location***

Report the following information regarding exposed population and receptor locations. See Chapter 9 and specific sections within this chapter for more detailed information.

- Description of zone of impact including map showing the location of the facility, boundaries of zone of impact, census tracts, emission sources, sites of maximum exposure, and the location of all appropriate receptors. This should be a true map (one that shows roads, structures, etc.), drawn to scale, and not just a schematic drawing. USGS 7.5 minute maps or GIS based maps are usually the most appropriate choices. (If significant development has occurred since the user's survey, this should be indicated.)
- Separate maps for the cancer risk zone of impact and the hazard index (noncancer) zone of impact(s). The cancer zone of impact should include isopleths down to at least the 1/1,000,000 risk level. Because some districts use a level below 1/1,000,000 to define the zone of impact, the District should be consulted. Three separate maps (to represent both chronic, 8-hour, and acute HI) should be created to define the zone of impact for the hazard index from both inhalation and noninhalation pathways greater than or equal to 0.5. The point of maximum impact (PMI), maximum exposed individual at a residential receptor (MEIR), the maximum exposed individual worker (MEIW), and any other locations of interest for both cancer and noncancer risks should be located on the maps.
- Tables identifying population units and sensitive receptors (UTM coordinates, receptor IDs, and street addresses of specified receptors).
- Heights or elevations of the receptor points.
- For each receptor type (e.g., PMI, MEIR, MEIW, and any other location(s) of interest) that will utilize spatial averaging, the domain size and grid resolution must be clearly identified. If another domain or grid resolution other than 20 meters by 20 meters with 5-meter grid spacing will be used for a receptor, then care should be taken to determine the proper domain size and grid resolution that should be used. For a worker, the HRA shall support all assumptions used, including, but not limited to, documentation for all workers showing the area where each worker routinely performs their duties. The final domain size should not be greater than the smallest area of worker movement. Other considerations for determining domain size and grid spacing resolution may include an evaluation of the concentration gradients across the worker area. The grid spacing used within the domain should be sufficient in number and detail to obtain a representative concentration across the area of interest. When spatial averaging over the deposition area of a pasture, garden, or water body, care should be taken to determine the proper domain size to make sure it includes all reasonable areas of potential deposition. The size and shape of the pasture, garden, or water body of interest should be identified and used for the modeling domain. The grid spacing or resolution used within the domain should be sufficient in detail to obtain a representative deposition concentration across the area of interest. One way to determine the grid resolution is to include an evaluation of the concentration gradients across the deposition area. The HRA shall support all assumptions used, including, but not limited to, documentation of the deposition area (e.g., size and shape of the pasture or water body, maps,

representative coordinates, grid resolution, concentration gradients, etc.). The use or spatial averaging is subject to approval by the reviewing authority. This includes the size of the domain and grid resolution that is used for spatial averaging of a worksite or multipathway deposition area.

#### **4.16.4 Meteorological Data**

If meteorological data were not obtained directly from the District, then the report must clearly indicate the data source and time period used. Meteorological data not obtained from the District must be submitted in electronic form along with justification for their use including information regarding representativeness and quality assurance.

The risk assessment should indicate if the District required the use of a specified meteorological data set. All memos indicating the District's approval of meteorological data should be attached in an appendix.

#### **4.16.5 Model Selection and Modeling Rationale**

The report should include an explanation of the model chosen to perform the analysis and any other decisions made during the modeling process. The report should clearly indicate the name of the models that were used, the level of detail (screening or refined analysis) and the rationale behind the selection.

Also report the following information for each air dispersion model used:

- version number
- selected options and parameters in table form
- Identify the modeling domain(s) and the spacing of receptor grid(s). Grid spacing should be sufficient in number and detail to capture the concentration at all receptors of interest.

#### **4.16.6 Air Dispersion Modeling Results**

- Maximum hourly and annual average concentrations of chemicals at appropriate receptors such as the residential and worker MEI receptors
- Annual average and maximum one-hour (and 30-day average for lead only) concentrations of chemicals at appropriate receptors listed and referenced to computer printouts of model outputs
- Model printouts (numbered), annual concentrations, maximum hourly concentrations
- Disk with input/output files for air dispersion program (e.g., the AERMOD input file containing the regulatory options and emission parameters, receptor locations, meteorology, etc.)
- Include tables that summarize the annual average concentrations that are calculated for all the substances at each site. The use of tables that present the relative contribution of each emission point to the receptor concentration is recommended. (These tables should have clear reference to the computer

model which generated the data. It should be made clear to any reader how data from the computer output were transferred to these tables.) [As an alternative, the above two tables could contain just the values for sites of maximum impact (i.e., PMI, MEIR and MEIW), and sensitive receptors, if required. All the values would be found in the Appendices.]

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#### 4.17 References

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## 5 - Exposure Assessment

### Estimation of Concentration and Dose

#### 5.1 Introduction

This chapter provides a summary of how toxicant ground level air concentrations estimated from air dispersion modeling or monitoring results are used to determine dose at receptors of interest. This chapter includes all the algorithms and data (e.g., point estimates, distributions, and transfer factors) that are needed to determine the substance-specific concentration in exposure media and the dose at a receptor of interest. The determination of exposure concentration and dose precedes the calculations of potential health impacts. See Chapter 8 and Appendix I for information on calculating potential health impacts.

At a minimum, three receptors are evaluated in Hot Spots health risk assessments (HRA) (see Section 4.7); these are:

- the Point of Maximum Impact (PMI),
- the Maximally Exposed Individual Resident (MEIR), and
- the Maximally Exposed Individual Worker (MEIW).

The PMI is defined as the receptor point(s) with the highest acute, 8-hour, chronic, or cancer health impact outside the facility boundary. The facility boundary is defined as the property line. Often the fence is on the property line. The MEIR is typically defined as the existing off-site residence(s) (i.e., house, apartment or other dwelling) with the highest acute, chronic, or cancer health impact. Calculating an 8-hour hazard index is not required for the MEIR, but can be performed at the discretion of the District. The MEIW is typically defined as the existing offsite workplace with the highest acute, 8-hour, chronic, or cancer health impact.

In addition, it may be necessary to determine risks at sensitive receptors (e.g., schools, day care centers, elder care centers, and hospitals). The District or reviewing authority should be consulted in order to determine the appropriate sensitive receptors for evaluation. Some situations may require that on-site receptor (worker or residential) locations be evaluated. Some examples where the health impacts of on-site receptors may be appropriate could be military base housing, prisons, universities, or locations where the public may have regular access for the appropriate exposure period (e.g., a lunch time café or museum for acute exposures). The risk assessor should contact the Air Pollution Control or Air Quality Management District (the District) for guidance about any on-site exposure situations at the emitting facility. These on-site locations should be included in the health risk assessment (HRA). If the facility emits multiple substances from two or more stacks, the acute, 8-hour, chronic, and cancer health impacts at the PMI may be located at different physical locations. The MEIR or MEIW cancer, acute, 8-hour, and chronic receptors may also be at different locations.

The process for determining dose at the receptor location, and ultimately potential health impacts, will likely include air dispersion modeling, and, with less frequency, air monitoring data. Air dispersion modeling combines the facility emissions and release parameters and uses default or site-specific meteorological conditions to estimate downwind, ground-level concentrations at various (user-defined) receptor locations. Air dispersion modeling is described in Chapter 4 and is presented in detail in the *Air Toxics Hot Spots Program Risk Assessment Guidelines; Technical Support Document for Exposure Assessment and Stochastic Analysis* (OEHHA, 2012a).

In summary, the process of using air dispersion modeling results as the basis of an HRA follows these four steps:

- Air dispersion modeling is used to estimate annual average and maximum one-hour ground level concentrations (GLC). The air dispersion modeling results are expressed as an air concentration or in terms of (Chi over Q) for each receptor point. (Chi over Q) is the modeled downwind air concentration (Chi) based on an emission rate of one gram per second (Q). (Chi over Q) is expressed in units of micrograms per cubic meter per gram per second, or  $(\mu\text{g}/\text{m}^3)/(\text{g}/\text{s})$ . (Chi over Q) is sometimes written as  $(\chi/Q)$  and is sometimes referred to as the dilution factor.
- When multiple substances are evaluated, the  $\chi/Q$  is normally utilized since it is based on an emission rate of one gram per second. The  $\chi/Q$  at the receptor point of interest is multiplied by the substance-specific emission rate (in g/s) to yield the substance-specific ground-level concentration (GLC) in units of  $\mu\text{g}/\text{m}^3$ . The following equations illustrate this point.

$$\text{GLC} = \left( \chi/Q \right) \times (Q_{\text{substance}})$$

$$\chi/Q = (\text{Chi over Q}) \text{ in } \left( \frac{\mu\text{g}/\text{m}^3}{\text{g}/\text{s}} \right), \text{ from model results with unit emission rate}$$

$$Q_{\text{substance}} = \text{substance specific emission rate} \left( \frac{\text{g}}{\text{s}} \right)$$

- The applicable exposure pathways (e.g., inhalation, soil contact, fish consumption) are identified for the emitted substances, and the receptor locations are identified. This determines which exposure algorithms in this chapter are ultimately used to estimate dose. After the exposure pathways are identified, the fate and transport algorithms described in this chapter are used to estimate concentrations in the applicable exposure media (e.g., soil or water) and the exposure algorithms are used to determine the substance-specific dose.
- The dose is used with cancer and noncancer health values to calculate the potential health impacts for the receptor (Chapter 8). An example calculation

using the high-end point-estimates for the inhalation (breathing) exposure pathway can be found in Appendix I. Appendix I and Chapters 5 (this Section) and 8 also contain information on how the annual average and maximum one-hour ground level concentrations are used for chronic, 8-hour, and acute health risk calculations.

The algorithms in this chapter are also used to calculate media concentrations and dose in the rare instance, for the Hot Spots program, when monitoring equipment was used rather than air dispersion modeling to obtain a receptor's substance-specific GLC. One situation that is specific to monitored data is the treatment of results below the sampling method level of detection (LOD). In short, it is standard risk assessment practice when monitoring results are reported both above and below the LOD to use one-half of the LOD for those sample concentrations reported below the LOD. If all testing or monitoring results fall below the LOD, then assessors should contact the District for appropriate procedures. For more information about reporting emissions under the Hot Spots Program, see the ARB's *Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5)*, and the *Emission Inventory Criteria and Guidelines Report (EICG Report)*, which is incorporated by reference therein (ARB, 2007).

The recommended model for calculating and presenting HRA results for the Hot Spots Program is the HARP software, available from the Air Resources Board (ARB). More information on HARP and directions for downloading the software can be found on the ARB's web site at <http://www.arb.ca.gov/toxics/harp/downloads.htm>.

## 5.2 Criteria for Exposure Pathway Evaluation

In order to determine total dose to the receptor the applicable pathways of exposure need to be identified. The inhalation pathway must be evaluated for all Hot Spots substances emitted by the facility. A small subset of Hot Spots substances is subject to deposition onto soil, plants, and water bodies. These substances need to be evaluated by the appropriate noninhalation pathways, as well as by the inhalation pathway, and the results must be presented in all HRAs. These substances include semi-volatile organic chemicals and heavy metals. Such substances are referred to as multipathway substances. Two steps are necessary to determine if a substance should be evaluated for multipathway impacts:

1. Determine whether the substance or its group (e.g., dioxins, PAHs) is listed in Table 5.1.
2. Determine if the substance has an oral reference exposure level (REL) listed in Table 6.4, or if it has an oral cancer slope factor listed in Table 7.1. Two other references for checking the presence of oral health factors are OEHHA's website (OEHHA, 2012b) and the *Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values* on the Air Resources Board website (ARB, 2012). Oral or noninhalation exposure pathways include the ingestion of soil, angler-caught fish, drinking water from surface water sources, mother's milk,

homegrown produce, beef, pork, chicken, eggs and cow's milk. The dermal pathway is also evaluated via contact with contaminated soil.

For all multipathway substances, the minimum exposure pathways that must be evaluated at every residential site (in addition to inhalation) are soil ingestion and dermal exposure. If dioxins, furans, PCBs, PAHs or lead are emitted, then the breast-milk consumption pathway also becomes mandatory. The other exposure pathways (e.g., the ingestion of homegrown produce or angler-caught fish) are evaluated on a site-by-site basis. If the resident can be exposed through an impacted exposure pathway, then it must be included in the HRA. However, if there are no vegetable gardens or fruit trees within the zone of impact for a facility, for example, then the produce pathways need not be evaluated. Note that on-site residential receptors are potentially subject to inhalation and noninhalation exposure pathways. Table 8.2 identifies the residential and worker receptor exposure pathways that are mandatory and those that are dependent on the site-specific decisions. While residents can be exposed through several exposure pathways, worker receptors are only evaluated for inhalation, soil ingestion, and dermal exposure using point estimates.

Table 5.1 shows the multipathway substances that, based on available scientific data, can be considered for each noninhalation exposure pathway. The exposure pathways that are evaluated for a substance depend on two factors: 1) whether the substance is considered a multipathway substance for the Hot Spots Program (Table 5.1), and 2) what the site-specific conditions are. A multipathway substance may be excluded from a particular exposure pathway because its physical-chemical properties can preclude significant exposure via the pathway. For example, some water-soluble substances do not appreciably bioaccumulate in fish; therefore, the fish pathway is not appropriate. In addition, if a particular exposure pathway is not impacted by the facility or is not present at the receptor site, then the pathway is not evaluated. For example, if a fishable water body is not impacted by the facility, or the water source is impacted but no receptor uses it for fishing, then the angler-caught fish pathway is not evaluated.

**Table 5.1 Specific Pathways to be Analyzed for Each Multipathway Substance**

Substance	Soil Ingestion	Dermal	Meat, Milk & Egg Ingestion	Fish Ingestion	Exposed Vegetable Ingestion	Leafy Vegetable Ingestion	Protected Vegetable Ingestion	Root Vegetable Ingestion	Water Ingestion	Breast Milk Ingestion
<b><i>Inorganic chemicals</i></b>										
Arsenic & compounds	X	X	X	X	X	X	X	X	X	
Beryllium & compounds	X	X	X	X	X	X	X	X	X	
Cadmium & compounds	X	X	X	X	X	X	X	X	X	
Chromium VI & compounds	X	X	X <sup>a</sup>	X	X	X	X	X	X	
Fluorides (soluble compounds)	X	X	X		X	X	X	X	X	
Lead & compounds	X	X	X	X	X	X	X	X	X	X
Mercury & compounds	X	X	X	X	X	X	X	X	X	
Nickel & compounds	X	X	X	X	X	X	X	X	X	
Selenium & compounds	X	X	X	X	X	X	X	X	X	
<b><i>Organic chemicals</i></b>										
Creosotes	X	X	X	X	X	X			X	X
Diethylhexylphthalate	X	X	X	X	X	X			X	
Hexachlorobenzene	X	X	X	X	X	X			X	
Hexachlorocyclohexanes	X	X	X	X	X	X			X	
4,4'-Methylene dianiline	X	X			X	X			X	
Pentachlorophenol <sup>b</sup>										
PCBs	X	X	X	X	X	X			X	X
Polychlorinated dibenzo-p-dioxins and dibenzofurans	X	X	X	X	X	X			X	X
PAHs	X	X	X	X	X	X			X	X

<sup>a</sup> Cow's milk only; no multipathway analysis for meat and egg ingestion

<sup>b</sup> To be evaluated by pathway in future amendments to the Hot Spots Program

### 5.3 Estimation of Concentrations in Air, Soil, and Water

Once emissions exit the source, the substances emitted will be dispersed in the air. The substances in the exhaust gas with high vapor pressures will remain largely in the vapor phase, and substances with lower vapor pressures will tend to adsorb to fly ash or other particulate matter. The emission plume may contain both vapor phase substances and particulates. A semivolatile organic toxicant can partition into both vapor and particulate phases. Particulates will deposit on vegetation, on soil, and in water at a rate that is dependent on the particle size. Use the 0.02 m/s deposition rate for emission sources that have verifiable particulate matter control devices or for emission sources that may be uncontrolled but only emit particulate matter that is less than 2.5 microns (e.g., internal combustion engines). The following algorithms are used to estimate concentrations in environmental media including air, soil, water, vegetation, and animal products.

### 5.3.1 Air

The ground level concentration (GLC, or  $C_{\text{air}}$  as shown in EQ 5.3.1) of a substance in air is a function of the facility emission rate and the dilution factor ( $\chi/Q$ ) at the points under evaluation.

#### **A. Equation 5.3.1:**

$$C_{\text{air}} = Q_{\text{substance}} \times \chi/Q$$

1.  $C_{\text{air}}$  = Ground level concentration ( $\mu\text{g}/\text{m}^3$ )
2.  $Q_{\text{substance}}$  = Substance emission rate (g/sec)
3.  $\chi/Q$  = Dilution factor provided by dispersion modeling ( $\mu\text{g}/\text{m}^3/\text{g}/\text{sec}$ )

#### **a. Recommended values for EQ 5.3.1:**

1.  $Q_{\text{substance}}$  = Facility-specific, substance emission rate
2.  $\chi/Q$  = For point of interest, site specific, from dispersion modeling

#### **b. Assumptions for EQ 5.3.1:**

1. No plume depletion
2. Emission rate is constant, i.e., assumes steady state

### 5.3.2 Soil

The average concentration of the substance in soil ( $C_s$ ) is a function of the deposition, accumulation period, chemical specific soil half-life, mixing depth, and soil bulk density. For simplicity and health protection, the Tier 1 default assumes 70-year soil deposition for the accumulation period at end of 70-year facility lifetime. The risk assessor may also choose a supplemental Tier 2 approach, subject to District approval or reviewing authority approval, in which the assessor applies a soil accumulation period based on the facility's start date of operation (e.g., historical date when emissions began), or the current exposure conditions, and the expected duration of operation.

#### **A. Equation 5.3.2 A:**

$$C_s = \text{Dep} \times X / (K_s \times \text{SD} \times \text{BD} \times T_t)$$

1.  $C_s$  = Average soil concentration over the evaluation period ( $\mu\text{g}/\text{kg}$ )
2. Dep = Deposition on the affected soil area per day ( $\mu\text{g}/\text{m}^2\text{-d}$ )
3. X = Integral function for soil accumulation (d), see **EQ 5.3.2 C** below
4.  $K_s$  = Soil elimination constant ( $\text{d}^{-1}$ )
5. SD = Soil mixing depth (m)
6. BD = Soil bulk density ( $\text{kg}/\text{m}^3$ )
7.  $T_t$  = Soil exposure duration or soil accumulation period (d)

**a: Recommended default values for EQ 5.3.2 A:**

1. Dep = Calculated in EQ 5.3.2 B
2. X = Calculated in EQ 5.3.2 C
3.  $K_s$  = Calculated in EQ 5.3.2 D
4. SD = 0.01 (m) for playground setting (soil ingestion and dermal pathways) and 0.15 (m) for agricultural setting (produce and meat pathways)
5. BD = 1,333 ( $\text{kg}/\text{m}^3$ )
6.  $T_t$  = 25,550 (d) = 70 years

**b: Assumptions for EQ 5.3.2 A:**

1. Substances are uniformly mixed in soil.
2. Substances are not leached or washed away, except where evidence exists to the contrary.
3. It is assumed that toxicants accumulate in the soil for 70 years from deposition over the 70 year lifespan of the facility. Use 70-year soil accumulation ( $T_t$ ) for Tier 1 estimation of 9-, 30- and 70-year residential exposure, and 25-year off-site worker exposure.
4. For a receptor ingesting mother's milk, the mother is exposed from birth to 25 years of age; the infant is then born and receives mother's milk for one year. Default assumes 70-year soil accumulation for mother's milk pathway. See Table 5.1 for information on which substances or groups of substances must be evaluated by the mother's milk pathway.

**B. Equation 5.3.2 B:**

$$\text{Dep} = C_{\text{air}} \times \text{Dep-rate} \times 86,400$$

1.  $C_{\text{air}}$  = Ground level concentration ( $\mu\text{g}/\text{m}^3$ )
2. Dep-rate = Vertical rate of deposition (m/sec)
3. 86,400 = Seconds per day conversion factor (sec/d)

**a: Recommended default values for EQ 5.3.2 B:**

1.  $C_{\text{air}}$  = Calculated above in EQ 5.3.1 A
2. Dep-rate = Use 0.02 meters/second for controlled sources, or 0.05 meters/second for uncontrolled sources.

**b: Assumptions for EQ 5.3.2 B:**

1. Deposition rate remains constant. A deposition rate must be used when determining potential noninhalation health impacts. In the absence of facility specific information on the size of the emitted particles, the default values for deposition rate should be used. Currently, the default value of 0.02 meters per second is used for emission sources that have verifiable particulate matter control devices or for emission sources that may be uncontrolled but only emit particulate matter that is less than 2.5 microns

(e.g., internal combustion engines). The 0.05 meters per second default value is used for risk assessment if the emissions are uncontrolled. If other deposition rate factors are used, sufficient support documentation must be included with the HRA.

**C. Equation 5.3.2 C:**

$$X = \left[ \frac{e^{-K_s \cdot T_f} - e^{-K_s \cdot T_o}}{K_s} \right] + T_t$$

1.  $e = 2.718$
2.  $K_s$  = Soil elimination constant
3.  $T_f$  = End of soil accumulation evaluation period (d)
4.  $T_o$  = Beginning of soil accumulation evaluation period (d)
5.  $T_t$  = Total days of soil exposure (soil accumulation period)  $T_f - T_o$  (d)

**a: Recommended default values for EQ 5.3.2 C:**

- 1:  $K_s$  = Calculated in EQ 5.3.2 D
- 2:  $T_f$  = 25,550 (d) = 70 years. Total soil exposure time at end of facility operation
- 3:  $T_o$  = 0 (d) The initial time (start period) of soil exposure to all receptors that are impacted by the soil pathway.

Note: Under a Tier 2 scenario, the risk assessor may also adjust  $T_f$  and  $T_t$ , subject to District approval, to replicate current soil accumulation and expected accumulation at the end of facility operation.

**D. Equation 5.3.2 D:**

$$K_s = 0.693 / t_{1/2}$$

1. 0.693 = Natural log of 2
2.  $t_{1/2}$  = Chemical specific soil half-life (d)

**a: Recommended default values for EQ 5.3.2 D:**

1.  $t_{1/2}$  = Chemical-specific. See Table 5.2

**5.3.3 Water**

The water pathway is evaluated if a standing water body (e.g., pond or lake) is impacted by facility emissions and is used as a source for drinking water by food-producing animals or humans, or is a source of angler-caught fish. The average concentration of the substance in water ( $C_w$ ) is a function of direct deposition and material carried in by surface run-off. However, only the contribution from direct deposition will be considered at this time.

**A. Equation 5.3.3 A:**

$$C_w = C_{depw}$$

1.  $C_w$  = Average concentration in water ( $\mu\text{g}/\text{kg}$ )
2.  $C_{depw}$  = Contribution due to direct deposition ( $\mu\text{g}/\text{kg}$ )

**B. Equation 5.3.3 B:**

$$C_{\text{depw}} = \text{Dep} \times \text{SA} \times 365 / (\text{WV} \times \text{VC})$$

1. Dep = Deposition on water body per day ( $\mu\text{g}/\text{m}^2/\text{d}$ )
2. SA = Water surface area ( $\text{m}^2$ )
3. 365 = Days per year (d/yr)
4. WV = Water volume (kg)
5. VC = Number of volume changes per year

**a: Recommended default values for EQ 5.3.3 B:**

1. Dep = Calculated above in EQ 5.3.2 B
2. SA = Site specific water surface area ( $\text{m}^2$ )
3. WV = Site specific water volume in (kg) (1L = 1 kg)
4. VC = Site specific number of volume changes per year  
(SA, WV, and VC values can be obtained from the appropriate Department of Water Resources (DWR) Regional office)

**b: Assumptions for EQ 5.3.3 B:**

1. With the exception of dilution via number of volume changes per year, all material deposited into the water remains suspended or dissolved in the water column and is available for bioaccumulation in fish.

**5.3.4 Estimation of Concentrations in Vegetation, Animal Products, and Mother's Milk**

Estimates of the concentration of the substance in vegetation, animal products and mother's milk require the use of the results of the air, water, and soil environmental fate evaluation. Plants, animals and nursing mothers will be exposed to the substances at the concentrations previously calculated in Section 5.31 to 5.33 above.

**5.3.4.1 Vegetation**

The average concentration of a substance in and on vegetation ( $C_v$ ) is a function of direct deposition of the substance onto the vegetation and of root translocation or uptake from soil contaminated by the substance. We currently recommend root translocation only for the inorganic compounds.

**A. Equation 5.3.4.1 A:**

$$C_v = C_{\text{depv}} + C_{\text{trans}}$$

1.  $C_v$  = Average concentration in and on specific types of vegetation ( $\mu\text{g}/\text{kg}$ )
2.  $C_{\text{depv}}$  = Concentration due to direct deposition ( $\mu\text{g}/\text{kg}$ )
3.  $C_{\text{trans}}$  = Concentration in vegetation due to root translocation or uptake ( $\mu\text{g}/\text{kg}$ ) – see EQ 5.3.4.1 C below

**B. Equation 5.3.4.1 B:**

$$C_{\text{depv}} = [\text{Dep} \times \text{IF} / (k \times Y)] \times (1 - e^{-kT})$$

1. Dep = Deposition on affected vegetation per day ( $\mu\text{g}/\text{m}^2/\text{d}$ )
2. IF = Interception fraction
3. k = Weathering constant ( $\text{d}^{-1}$ )
4. Y = Yield ( $\text{kg}/\text{m}^2$ )
5. e = Base of natural logarithm (2.718)
6. T = Growth period (d)

**a: Recommended default values for EQ 5.3.4.1 B:**

1. Dep = Calculated above in EQ 5.3.2 B
2. IF = Crop specific:
  - a: Root crops = 0.0
  - b: Leafy crops = 0.2
  - c: Protected crops = 0.0
  - d: Exposed crops = 0.1
  - e: Pasture = 0.7
3. k = 0.1 ( $\text{d}^{-1}$ )
4. Y = 2 ( $\text{kg}/\text{m}^2$ ) for root, leafy, protected, exposed and pasture [CA Department of Food and Agriculture dot maps]
5. T = 45 (d) for leafy crops  
T = 90 (d) for exposed crops

**b: Crop-type definitions for EQ 5.3.4.1 B:**

1. **Leafy** crop category consists of broad-leafed vegetables in which the leaf is the edible part. Examples include spinach, lettuce, cabbage, and kale.
2. **Root** crop category includes vegetables in which the edible portion is underground. Examples are potato, radish, and carrot.
3. **Exposed** produce category consists of crops with a small surface area subject to air deposition. Examples include strawberries, tomato, cucumber, zucchini, green bean and bell pepper.
4. **Protected** produce category consists of crops in which the edible part is not exposed to air deposition (e.g., the exposed skin of the crop is removed and not eaten). Examples are corn, pea, pumpkin and oranges.

Tables H-9 through H-15 in Appendix H provide more examples of various leafy, root, exposed and protected crop types.

**c: Assumptions for EQ 5.3.4.1 B:**

1. No deposition on root or protected crops
2. No uptake and translocation of deposited chemicals onto crops

**C. Equation 5.3.4.1 C: (for inorganic compounds)**

$$C_{\text{trans}} = C_s \times UF_2$$

1.  $C_s$  = Average soil concentration ( $\mu\text{g}/\text{kg}$ )
2.  $UF_2$  = Uptake factor based on soil concentration

**a: Recommended default values for EQ 5.3.4.1 C:**

1.  $C_s$  = Calculated above in EQ 5.3.2 A
2.  $UF_2$  = See Table 5.2

**D. Equation 5.3.4.1 D: (for organic compounds)**

$$UF_2 = [(0.03 \times K_{ow}^{0.77}) + 0.82] / [(K_{oc})(F_{oc})]$$

1. 0.03 = Empirical constant
2.  $K_{ow}$  = Octanol:water partition factor
3. 0.77 = Empirical constant
4. 0.82 = Empirical constant
5.  $K_{oc}$  = Organic carbon partition coefficient
6.  $F_{oc}$  = Fraction organic carbon in soil

**a: Recommended default values for EQ 5.3.4.1 D:**

1.  $K_{ow}$  = Chemical specific, see Table 5.2
2.  $K_{oc}$  = Chemical specific, see Table 5.2
3.  $F_{oc}$  = 0.1

**b: Assumptions for EQ 5.3.4.1 D:**

1. OEHHA currently has no recommended root uptake factors for organic compounds listed in Table 5.2. Evidence suggests this route is insignificant compared to airborne deposition. Nevertheless, if it becomes necessary in specific cases to assess root uptake for an organic compound, Equation 5.3.4.1 D would be the algorithm OEHHA recommends using to assess root uptake.

**5.3.4.2 Animal Products**

The average concentration of the substance in animal products ( $C_{fa}$ ) depends on which routes of exposure exist for the animals. Animal exposure routes include inhalation, soil ingestion, ingestion of contaminated feed and pasture, and ingestion of contaminated water.

**A. Equation 5.3.4.2:**

$$C_{fa} = (\text{Inhalation} + \text{Water ingestion} + \text{Feed ingestion} + \text{Pasture/Grazing ingestion} + \text{Soil ingestion}) * T_{co}$$

1.  $C_{fa}$  = Average concentration in farm animals and their products ( $\mu\text{g}/\text{kg}$ )
2. Inhalation, water ingestion, etc. = Dose through inhalation, water ingestion, etc. ( $\mu\text{g}/\text{d}$ )
3.  $T_{co}$  = Chemical-specific transfer coefficient of contaminant from diet to animal product ( $\text{d}/\text{kg}$ )

**a: Recommended default values for EQ 5.3.4.2:**

1.  $T_{co}$  = See Tables 5.3a and 5.3b

**b: Assumptions for EQ 5.3.4.2:**

1. The  $T_{co}$  for a given chemical is the same for all exposure routes

**5.3.4.2.1 Inhalation****A. Equation 5.3.4.2.1:**

$$\text{Inhalation} = BR_a \times C_{air}$$

1. Inhalation = Dose through inhalation ( $\mu\text{g}/\text{d}$ )
2.  $BR_a$  = Breathing rate for animal ( $\text{m}^3/\text{d}$ )
3.  $C_{air}$  = Ground-level concentration ( $\mu\text{g}/\text{m}^3$ )

**a: Recommended default values for EQ 5.3.4.2.1:**

1.  $BR_a$  = See Table 5.4
2.  $C_{air}$  = Calculated above in EQ 5.3.1 A

**b: Assumptions for EQ 5.3.4.2.1:**

1. All material inhaled is 100% absorbed

**5.3.4.2.2 Water Ingestion**

The water ingestion pathway is applied if there are surface water sources of drinking water, such as springs, ponds or lakes, which are exposed to airborne deposition of facility emissions. Due to the site-specific nature for this exposure pathway, OEHHA recommends that the risk assessor conduct a survey at the site to estimate the fraction of contaminated drinking water ingested by the animals, if such sources exist.

**A. Equation 5.3.4.2.2:**

$$\text{Water ingestion} = WI_a \times FSW \times C_w$$

1. Water ingestion = Dose through water ingestion ( $\mu\text{g}/\text{d}$ )
2.  $WI_a$  = Water ingestion for animal ( $\text{kg}/\text{d}$ )
3. FSW = Fraction of water ingested from a contaminated body of water (site-specific)
4.  $C_w$  = Average concentration in water ( $\mu\text{g}/\text{kg}$ )  
For water 1 kg = 1 L

**a: Recommended default values for EQ 5.3.4.2.2:**

1.  $WI_a$  = See Table 5.4
2. FSW = Site specific fraction, need to survey water ingestion practices in affected area
3.  $C_w$  = Calculated above in EQ 5.3.3 A

**5.3.4.2.3 Feed Ingestion**

The fraction of feed intake by cattle, pigs and poultry that is contaminated by facility emissions can vary considerably depending on the manner in which the animals are raised. Due to the site-specific nature for this exposure pathway, OEHHA recommends that the risk assessor conduct a survey at the site to estimate the fraction of contaminated feed eaten by the animals. For a Tier 1 assessment, default values are provided by OEHHA (see Table 5.4 and Table 5.4 footnotes) for estimation of exposure to the animals.

Agricultural mixing depth should be used for calculating soil concentration for feed and pasture contamination.

**5.3.4.2.3.1 Feed Ingestion****A. Equation 5.3.4.2.3.1:**

$$\text{Feed ingestion} = (1.0 - FG) \times FI \times L \times C_v$$

1. Feed ingestion = Dose through the ingestion of feed ( $\mu\text{g}/\text{d}$ ) that is harvested after it is impacted by source emissions
2. FG = Fraction of diet provided by grazing (site-specific)
3. FI = Feed ingestion rate ( $\text{kg}/\text{d}$ )
4. L = Fraction of locally grown (source impacted) feed that is not pasture (site-specific)
5.  $C_v$  = Concentration in feed ( $\mu\text{g}/\text{kg}$ )

**a: Recommended default values EQ 5.3.4.2.3.1:**

1. FG = Default values in Table 5.4 footnote b, although a site-specific survey for the fraction of diet provided by grazing is recommended
2. FI = See Table 5.4
3. L = Default values in Table 5.4 footnote b, although a site-specific survey for fraction of locally grown (source impacted) feed that is not pasture is recommended
4.  $C_v$  = As calculated above in EQ 5.3.4.1 A

**b: Assumptions for EQ 5.3.4.2.3.1:**

1. Feed (FI) transported from an off-site location (i.e., not grown locally) is not contaminated by facility emissions.

## 5.3.4.2.3.2 Pasture/Grazing ingestion

**A. Equation 5.3.4.2.3.2:**

<b>Pasture/Grazing ingestion = <math>FG \times C_v \times FI</math></b>
---

1. Pasture/Grazing ingestion = Dose through pasture/grazing ( $\mu\text{g}/\text{d}$ )
2. FG = Fraction of diet provided by grazing (site-specific)
3.  $C_v$  = Concentration in pasture/grazing material ( $\mu\text{g}/\text{kg}$ )
4. FI = Feed ingestion rate ( $\text{kg}/\text{d}$ )

**a: Recommended default values EQ 5.3.4.2.3.2:**

1. FG = Default values in Table 5.4 for fraction of diet provided by grazing, although a site-specific survey is recommended
2.  $C_v$  = As calculated above in EQ 5.3.4.1 A
3. FI = See Table 5.4

## 5.3.4.2.4 Soil ingestion

The feeds provided to dairy and beef cattle may contain small quantities of soil. A larger fraction of soil by weight of food is taken up during grazing. Rooting behavior by pigs with access to soil will result in soil ingestion. Likewise, poultry with free access to soil or pasture will also ingest soil. Defaults for soil ingestion are shown in Table 5.4.

**A. Equation 5.3.4.2.4 A:**

<b>Soil ingestion = <math>SI_a \times C_s</math></b>
--

1. Soil ingestion = Dose through soil ingestion ( $\mu\text{g}/\text{d}$ )
2.  $SI_a$  = Soil ingestion rate for animal ( $\text{kg}/\text{d}$ )
3.  $C_s$  = Average soil concentration ( $\mu\text{g}/\text{kg}$ )

**a: Recommended default values for EQ 5.3.4.2.4 A:**

1.  $SI_a$  = Calculated below
2.  $C_s$  = Calculated above in EQ 5.3.2 A

**B. Equation 5.3.4.2.4 B:**

$$SI_a = [(1 - FG) \times FS_f \times FI] + [FG \times FS_p \times FI]$$

1. FG = Fraction of diet provided by grazing
2.  $FS_f$  = Soil ingested as a fraction of feed ingested
3. FI = Feed ingestion rate (kg/d)
4.  $FS_p$  = Soil ingested as a fraction of pasture ingested

**a: Recommended default values for EQ 5.3.4.2.4 B:**

1. FG = Site specific fraction of diet provided by grazing
2.  $FS_f$  = See Table 5.4
3. FI = See Table 5.4
4.  $FS_p$  = See Table 5.4

**b: Assumptions for EQ 5.3.4.2.4 B:**

1. The transfer coefficient is the same for all exposure routes.
2. Soil ingested in feed ( $FS_f$ ) transported from an off-site location (i.e., not grown locally) is assumed not to be contaminated by facility emissions.

**5.3.4.3 Bioaccumulation in Angler-Caught Fish**

The average concentration in fish ( $C_f$ ) is based on the concentration in water and a chemical-specific bioaccumulation factor.

**A. Equation 5.3.4.3:**

$$C_t = C_w \times BAF$$

1.  $C_t$  = Concentration in wet weight tissue (muscle) of fish ( $\mu\text{g}/\text{kg}$ )
2.  $C_w$  = Concentration in water ( $\mu\text{g}/\text{kg}$ )
3. BAF = Fish bioaccumulation factor (unitless)

**a: Recommended default values for Equation 5.3.4.3:**

1.  $C_w$  = As calculated above in Equation 5.3.3 A
2. BAF = Chemical-specific; see Table 5.2

**b: Assumptions for Equation 5.3.4.3:**

1. For conversion of a chemical concentration in a volume of water shown as  $\mu\text{g/L}$ , 1 L water = 1 kg water; thus, for concentration of chemical in water,  $\mu\text{g/L} = \mu\text{g/kg}$ .
2. For organic chemicals, BAFs lipid-normalized to adult rainbow trout with 4% lipid content in muscle tissue
3. For organic chemicals, BAFs based on the freely dissolved fraction in water under conditions of average particulate organic carbon and dissolved organic carbon in U.S. lakes and other water bodies
4. For inorganic compounds, BAFs based on wet weight muscle tissue concentration and on the total water concentration of the inorganic compound in water.
5. Contaminant concentrations are uniform in water based on dispersion

**5.3.4.4 Bioaccumulation in Mother's Milk**

The average concentration of a chemical in mother's milk ( $C_m$ ) is a function of the mother's exposure through all exposure routes (i.e., inhalation, ingestion via food, drinking water, and soil, and dermal absorption via skin contact with soil contaminated with the chemical), the contaminant half-life in the mother's body, and transfer of absorbed chemical to mother's milk. The contaminant half-life in the body and transfer to mother's milk is incorporated in biotransfer coefficients ( $T_{co}$ ) in Equation 5.3.4.4. See the TSD (OEHHA, 2012a), Appendix J for details on development of biotransfer factors. The substances assessed by the mother's milk pathway are shown in Table 5.1.

**A. Equation 5.3.4.4:**  $C_m = [(D_{\text{inder}} \times T_{co_{m\_inder}}) + (D_{\text{ing}} \times T_{co_{m\_ing}})] \times BW$

1.  $C_m$  = Concentration in mother's milk (mg/kg-milk)
2.  $D_{\text{inder}}$  = The sum of  $DOSE_{\text{air}}$  +  $DOSE_{\text{dermal}}$  through inhalation and dermal absorption (mg/kg-BW-day)
3.  $D_{\text{ing}}$  = The sum of  $DOSE_{\text{food}}$  +  $DOSE_{\text{soil}}$  +  $DOSE_{\text{water}}$  through ingestion (mg/kg-BW-day)
4.  $T_{co_{m\_inder}}$  = Biotransfer coefficient from inhalation and dermal absorption to mother's milk (d/kg-milk)
5.  $T_{co_{m\_ing}}$  = Biotransfer coefficient from ingestion to mother's milk (d/kg-milk)
6.  $BW$  = Body weight of mother (Kg)

**a: Recommended cancer risk default values for EQ 5.3.4.4:**

1.  $D_{ing}$  = As calculated through ingestion of soil in EQ 5.4.3.1.1 + home-grown produce in EQ 5.4.3.2.1 + home-raised animal products in EQ 5.4.3.2.2 + drinking water in EQ 5.4.3.3.1 + angler-caught fish in EQ 5.4.3.4.1
2.  $D_{inder}$  = As calculated through inhalation in EQ 5.4.1.1 + dermal exposure in EQ 5.4.2.1
3.  $Tco_{m\_inder}$  = See Table 5.5
4.  $Tco_{m\_ing}$  = See Table 5.5

**b: Recommended noncancer risk default values for EQ 5.3.4.4:**

1.  $D_{ing}$  = As calculated through ingestion of soil in EQ 5.4.3.1.2 + home-grown produce and home-raised animal products in EQ 5.4.3.2.3 + drinking water in EQ 5.4.3.3.2 + angler-caught fish in EQ 5.4.3.4.2
2.  $D_{inder}$  = As calculated through inhalation in EQ 5.4.1.1 + dermal exposure in EQ 5.4.2.2
3.  $Tco_{m\_inder}$  = See Table 5.5
4.  $Tco_{m\_ing}$  = See Table 5.5

**c: Assumptions for EQ 5.3.4.4:**

1. Default age of mother at birth is 25 years of age, then nurses the infant for 1 year; Use 16<30 year old high-end (95<sup>th</sup> percentile) daily breathing rate and intake rates for  $D_{ing}$  and  $D_{inder}$  for estimating dose to mother.
2. For inhalation dose to mother's milk, it is recommended that the EF variate in EQ 5.4.1.1 is left out for calculation of inhalation dose in the mother's milk pathway.
3. Biotransfer coefficient,  $Tco_{m\_inder}$ , the same for both inhalation and dermal pathways based on lack of first-pass metabolism through the liver for both of these pathways.
4. Biotransfer coefficient,  $Tco_{m\_ing}$ , the same for all ingestion pathways based on first-pass metabolism through the liver.
5. For chemicals in Table 5.5 lacking either an oral or inhalation Tco, use the oral Tco for the absent inhalation Tco (i.e., for PCDDs and PCDFs and dioxin-like PCBs), or the inhalation Tco for the absent oral Tco (i.e., for lead) in Equation 5.3.4.4.
6. The concentration in the mother's milk is determined using the derived approach to risk assessment. This method allows use of the high-end dose point estimate for driving exposure pathways and the average dose point estimates for other exposure pathways. See Sections 8.2.6 (cancer) and 8.3.3 (noncancer) for the description of the methodology on how to implement the derived methodology.

**Table 5.2a Substance-Specific Default Values for Organic Multipathway Substances**

Multipathway Substance	Log K <sub>oc</sub>	Log K <sub>ow</sub>	Fish BAF	Root Uptake Factors				GRAF <sup>2</sup>	Soil HalfLife (days)
				Root	Leafy	Exposed	Protected		
<b>Creosotes</b>	NA	NA	8 x 10 <sup>+2</sup>	NA	NA	NA	NA	1.0	4.3 x 10 <sup>+2</sup>
<b>Diethylhexyl-phthalate</b>	5.34 <sup>1</sup>	7.63 <sup>1</sup>	4 x 10 <sup>+1</sup>	NA	NA	NA	NA	1.0	1.5 x 10 <sup>+1</sup>
<b>Dioxins and Furans</b>	NA	NA	3 x 10 <sup>+5</sup>	NA	NA	NA	NA	0.43	7.0 x 10 <sup>+3</sup>
<b>Hexachlorobenzene</b>	NA	NA	8 x 10 <sup>+4</sup>	NA	NA	NA	NA	1.0	1.0 x 10 <sup>+8</sup>
<b>Hexachlorocyclohexanes</b>	NA	NA	3 x 10 <sup>+3</sup>	NA	NA	NA	NA	1.0	9.4 x 10 <sup>+1</sup>
<b>4,4'-Methylene dianiline</b>	2.24 <sup>3</sup>	1.59 <sup>4</sup>	NA	NA	NA	NA	NA	1.0	4.6 x 10 <sup>+2</sup>
<b>Pentachlorophenol<sup>5</sup></b>									
<b>Polycyclic Aromatic Hydrocarbons (PAHs)</b>	NA	NA	8 x 10 <sup>+2</sup>	NA	NA	NA	NA	1.0	4.3 x 10 <sup>+2</sup>
<b>Polychlorinated Biphenyls</b>	NA	NA	2 x 10 <sup>+6</sup>	NA	NA	NA	NA	1.0	3.2 x 10 <sup>+3</sup>

(1) Averaged log Kow and Koc values determined by most reliable methods (Staples et al., 1997)

(2) GRAF (Gastrointestinal Relative Absorption Factor). The guidelines allow for adjusting for bioavailability where the evidence warrants. For example, there are good data which indicate that dioxin is not as available to an organism when bound to soil or fly ash matrices relative to when it is in solution or in food. Therefore, a bioavailability factor is incorporated into the model to account for this difference. When information becomes available for other chemicals of concern, this type of bioavailability will be incorporated into the model.

(3) Measured by Hansch et al. (1985)

(4) Estimated according to methodology of Lyman et al. (1990)

(5) To be evaluated for specific default values in future amendments to the Hot Spots Program.

NA - Data Not Available or Not Applicable

**Table 5.2b Substance-Specific Default Values for Inorganic Multipathway Substances**

Multipathway Substance	Log K <sub>oc</sub>	Log K <sub>ow</sub>	Fish BAF	Root Uptake Factors				GRAF <sup>1</sup>	Soil HalfLife (days)
				Root	Leafy	Exposed	Protected		
<b>Arsenic &amp; Inorganic Compounds</b>	NA	NA	2 x 10 <sup>+1</sup>	8 x 10 <sup>-3</sup>	1 x 10 <sup>-2</sup>	2 x 10 <sup>-2</sup>	7 x 10 <sup>-2</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Beryllium &amp; Compounds</b>	NA	NA	4 x 10 <sup>+1</sup>	5 x 10 <sup>-3</sup>	2 x 10 <sup>-4</sup>	8 x 10 <sup>-3</sup>	3 x 10 <sup>-4</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Cadmium &amp; Compounds</b>	NA	NA	4 x 10 <sup>+1</sup>	8 x 10 <sup>-2</sup>	1 x 10 <sup>-1</sup>	2 x 10 <sup>-2</sup>	1 x 10 <sup>-2</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Chromium VI &amp; Compounds</b>	NA	NA	2 x 10 <sup>+1</sup>	3 x 10 <sup>+0</sup>	3 x 10 <sup>-1</sup>	2 x 10 <sup>-2</sup>	7 x 10 <sup>-2</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Fluorides (soluble compounds)</b>	NA	NA	NA	9 x 10 <sup>-3</sup>	4 x 10 <sup>-2</sup>	4 x 10 <sup>-3</sup>	4 x 10 <sup>-3</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Lead &amp; Compounds</b>	NA	NA	2 x 10 <sup>+1</sup>	4 x 10 <sup>-3</sup>	8 x 10 <sup>-3</sup>	7 x 10 <sup>-3</sup>	3 x 10 <sup>-3</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Mercury &amp; Inorganic Compounds<sup>2</sup></b>	NA	NA	8 x 10 <sup>+1</sup>	2 x 10 <sup>-2</sup>	2 x 10 <sup>-2</sup>	9 x 10 <sup>-3</sup>	1 x 10 <sup>-2</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Nickel and compounds</b>	NA	NA	2 x 10 <sup>+1</sup>	6 x 10 <sup>-3</sup>	1 x 10 <sup>-2</sup>	3 x 10 <sup>-3</sup>	3 x 10 <sup>-2</sup>	1.0	1.0 x 10 <sup>+8</sup>
<b>Selenium &amp; compounds</b>	NA	NA	1 x 10 <sup>+3</sup>	7 x 10 <sup>-2</sup>	6 x 10 <sup>-2</sup>	4 x 10 <sup>-2</sup>	3 x 10 <sup>-1</sup>	1.0	1.0 x 10 <sup>+8</sup>

(1) GRAF (Gastrointestinal Relative Absorption Factor). The guidelines allow for adjusting for bioavailability where the evidence warrants. For example, there are good data which indicate that dioxin is not as available to an organism when bound to soil or fly ash matrices relative to when it is in solution or in food. Therefore, a bioavailability factor is incorporated into the model to account for this difference. When information becomes available for other chemicals of concern, this type of bioavailability will be incorporated into the model.

(2) Methyl mercury (MeHg) is not represented in the category "mercury & inorganic compounds". The BAF for methyl mercury is orders of magnitude higher than for inorganic mercury. Assessment of MeHg for the fish pathway is not directly applicable to the Hot Spots program, as no facilities are known to emit MeHg directly into the air (OEHHA, 2012; OEHHA, 2006), but it may be formed by action of microbes in sediment. Assessing the methylation of mercury deposited into a water body is difficult, and is also very water body-specific. At this time OEHHA cannot address this issue in the Hot Spots program, but will consider addressing this problem in future amendments of the Guidance.

NA - Data Not Available or Not Applicable.

**Table 5.3a Animal Transfer Coefficients for Persistent Organic Chemicals**

Organic Chemical	Tco (d/kg) <sup>a</sup>				
	Cow's Milk	Chicken Egg	Chicken Meat	Cattle Meat	Pig Meat
Diethylhexylphthalate	9 x 10 <sup>-5</sup>	0.04	0.002	6 x 10 <sup>-4</sup>	5 x 10 <sup>-4</sup>
Hexachlorobenzene	0.02	20	10	0.2	0.08
Hexachlorocyclohexanes	0.01	7	5	0.2	0.09
PAHs	0.01	0.003	0.003	0.07	0.06
Polychlorinated biphenyls					
Congener 77	0.001	6	4	0.07	0.4
81	0.004	10	7	0.2	0.4
105	0.01	10	7	0.6	0.7
114	0.02	10	7	0.9	0.7
118	0.03	10	7	1	0.7
123	0.004	10	7	0.2	0.7
126	0.04	10	7	2	0.7
156	0.02	10	8	0.9	2
157	0.01	10	8	0.5	2
167	0.02	10	8	1	2
169	0.04	10	8	2	2
189	0.005	10	8	0.2	1
Unspeciated (PCB 126) <sup>b</sup>	0.04	10	7	2	0.7
PCDD/Fs					
Congener 2,3,7,8-TCDD	0.02	10	9	0.7	0.1
1,2,3,7,8-PeCDD	0.01	10	9	0.3	0.09
1,2,3,4,7,8-HxCDD	0.009	10	6	0.3	0.2
1,2,3,6,7,8-HxCDD	0.01	10	6	0.4	0.1
1,2,3,7,8,9-HxCDD	0.007	7	3	0.06	0.02
1,2,3,4,6,7,8-HpCDD	0.001	5	2	0.05	0.2
OCDD	0.0006	3	1	0.02	0.1
2,3,7,8-TCDF	0.004	10	6	0.1	0.02
1,2,3,7,8-PeCDF	0.004	30	10	0.1	0.01
2,3,4,7,8-PeCDF	0.02	10	8	0.7	0.09
1,2,3,4,7,8-HxCDF	0.009	10	5	0.3	0.1
1,2,3,6,7,8-HxCDF	0.009	10	6	0.3	0.09
2,3,4,6,7,8-HxCDF	0.008	5	3	0.3	0.06
1,2,3,7,8,9-HxCDF	0.009	3	3	0.3	0.03
1,2,3,4,6,7,8-HpCDF	0.002	3	1	0.07	0.06
1,2,3,4,7,8,9-HpCDF	0.003	3	1	0.1	0.02
OCDF	0.002	1	0.6	0.02	0.03
Unspeciated (2,3,7,8-TCDD) <sup>b</sup>	0.02	10	9	0.7	0.1

<sup>a</sup> All Tco values were rounded to the nearest whole number.

<sup>b</sup> For unspciated mixtures, use PCB 126 Tcos to represent the class of PCBs, and 2378-TCDD Tcos to represent the class of PCDDs/Fs.

**Table 5.3b Animal Transfer Coefficients for Inorganic Chemicals**

Inorganic Metals and Chemicals	Tco (d/kg) <sup>a</sup>				
	Cow's Milk	Chicken Egg	Chicken Meat	Cattle Meat	Pig Meat
Arsenic	$5 \times 10^{-5}$	0.07	0.03	$2 \times 10^{-3}$	0.01 <sup>b</sup>
Beryllium	$9 \times 10^{-7}$	0.09	0.2	$3 \times 10^{-4}$	0.001
Cadmium	$5 \times 10^{-6}$	0.01	0.5	$2 \times 10^{-4}$	0.005
Chromium (VI)	$9 \times 10^{-6}$	NA <sup>c</sup>	NA	NA	NA
Fluoride	$3 \times 10^{-4}$	0.008	0.03	$8 \times 10^{-4}$	0.004 <sup>b</sup>
Lead	$6 \times 10^{-5}$	0.04	0.4	$3 \times 10^{-4}$	0.001 <sup>b</sup>
Mercury	$7 \times 10^{-5}$	0.8	0.1	$4 \times 10^{-4}$	0.002 <sup>b</sup>
Nickel	$3 \times 10^{-5}$	0.02	0.02	$3 \times 10^{-4}$	0.001
Selenium	0.009	3	0.9	0.04	0.5

<sup>a</sup> All Tco values were rounded to the nearest whole number.

<sup>b</sup> The meat Tco was estimated using the metabolic weight adjustment ratio of 4.8 from cattle to pig

<sup>c</sup> NA – no data available or was not applicable

**Table 5.4 Point Estimates for Animal Pathway**

Parameter	Beef Cattle	Lactating Dairy Cattle	Pigs	Meat Poultry	Egg-laying Poultry
BW (body weight in kg)	533	575	55	1.7	1.6
BR <sub>a</sub> (inhalation rate in m <sup>3</sup> /d)	107	115	7	0.4	0.4
WL <sub>a</sub> (water consumption in kg/d)	45	110	6.6	0.16	0.23
FI (Food Intake in kg/d)	9	22	2.4	0.13	0.12
DMI <sup>a</sup> and/or pasture grazing <sup>b</sup>					
FS <sub>f</sub> (soil fraction of feed)	0.01	0.01	NA	NA	NA
FS <sub>p</sub> (soil fraction of pasture)	0.05	0.05	0.04	0.02	0.02

<sup>a</sup> Dry matter intake

<sup>b</sup> For beef and dairy cattle, pasture grazing is assumed to be leafy vegetation (grasses, including greenchop) and accounts for half of the cattle's diet (FG=0.5 in Section 5.3.4.2.3). The default assumes on-site pasture grazing contaminated by facility emissions. Fraction of feed or dry matter intake (e.g., hay, grain) grown on-site is assumed to be contaminated by facility emissions and fraction of feed that is grown off-site is not assumed to be contaminated. A default may be used that assumes all feed is grown off-site (L=0 in Section 5.3.4.2.3), but a survey is recommended to verify the fractions of feed grown on-site and off-site.

For pigs with access to soil, but usually confined to a pen, default assumes no pasture grazing (FG=0 in Section 5.3.4.2.3). For feed, estimated intake consists of equal portions of all plant types including exposed, leafy, protected and root in which 10% (L=0.1 in Section 5.3.4.2.3) of the diet is homegrown and contaminated by facility emissions. The fraction of feed that was transported from an off-site location is assumed not to be contaminated by facility emissions.

For poultry including egg-laying and broiler chickens that have access to soil, default assumes no pasture grazing (FG=0 in Section 5.3.4.2.3). Estimated feed intake is composed of equal proportions of all plant types with 5% (L=0.05 in Section 5.3.4.2.3) homegrown and contaminated by facility emissions. The fraction of feed grown off-site and transported to the receptor was not contaminated by facility emissions.

NA - Not applicable. Assume FS<sub>f</sub> is equal to zero.

**Table 5.5 Mother's Milk Transfer Coefficients (Tco<sub>m</sub>)<sup>a</sup>**

<b>Chemical/chem. group</b>	<b>Tco<sub>m</sub> (day/kg-milk)</b>
PCDDs - oral <sup>b</sup>	3.7
PCDFs - oral <sup>b</sup>	1.8
Dioxin-like PCBs - oral <sup>b</sup>	1.7
PAHs – inhalation <sup>c</sup>	1.55
PAHs – oral	0.401
Lead - inhalation <sup>d</sup>	0.064

<sup>a</sup> These compound classes represent the chemicals of greatest concern for the mother's milk pathway under the Hot Spots program. It is expected that additional transfer coefficients will be developed for other multipathway chemicals in the Hot Spots Program as data becomes available and is reviewed.

<sup>b</sup> Use the oral Tco<sub>m</sub> for the inhalation and dermal pathways. The PCDD, PCDF and dioxin-like PCB Tcos were derived using a Random-effects model from individual Tco<sub>m</sub> estimates for 7 PCDDs, 9 PCDFs and 12 dioxin-like PCBs (See OEHHA, 2012, Appendix J).

<sup>c</sup> Use the inhalation Tco<sub>m</sub> for the dermal pathway

<sup>d</sup> Use the inhalation Tco<sub>m</sub> for the ingestion and dermal pathways

## 5.4 Estimation of Dose

Once the concentrations of substances are estimated in air, soil, water, plants, and animal products, they are used to evaluate estimated exposure to people. Exposure is evaluated by calculating the daily dose in milligrams per kilogram body weight per day (mg/kg/d). The following algorithms calculate this dose for exposure through inhalation, dermal absorption, and ingestion pathways. All chemicals must be assessed for exposure through inhalation. If there are emissions of one or more of the subset of semi- or non-volatile multipathway substances, the soil ingestion pathway and the dermal soil exposure pathway are also assessed. The mother's milk pathway may also be a mandatory pathway depending on the multipathway substance released (See Table 5.1). The other exposure pathways may also need to be assessed if a survey of the exposure site shows they are present (e.g., ingestion of water, home-grown crops, home-raised animal products, and angler-caught fish).

This section contains average and high-end point estimates and data distributions for adults and children for many exposure pathways. The point-estimates and data distributions for children fall within the 3<sup>rd</sup> trimester, 0<2, 2<9, and 2<16 year age groupings. The point-estimates and data distributions for adults fall within the 16<30 and 16-70 year age groupings. When evaluating 9-, 30-, and 70-year exposure durations for cancer risk assessment, assessors will use distributions starting at the third trimester.

Workers are assessed for cancer risk as adults using 8-hour breathing rate point estimates (See Table 5.8). Point estimates for workers are listed under "offsite worker." OEHHA has not developed stochastic distributions for worker exposure. Therefore, there is no Tier 3 stochastic approach for offsite worker cancer risk assessment.

### 5.4.1 *Estimation of Exposure through Inhalation*

The dose through the inhalation route is estimated for cancer risk assessment and noncancer hazard assessment. Both residential and offsite worker exposures are considered. Since residential exposure includes near-continuous long-term exposure at a residence and workers are exposed only during working hours (i.e., 8 hours/day), different breathing rate distributions are used.

#### 5.4.1.1 Residential Inhalation Dose for Cancer Risk Assessment

Exposure through inhalation is a function of the breathing rate, the exposure frequency, and the concentration of a substance in the air. For residential exposure, the breathing rates are determined for specific age groups, so inhalation dose (Dose-air) is calculated for each of these age groups, 3<sup>rd</sup> trimester, 0<2, 2<9, 2<16, 16<30 and 16-70 years. OEHHA used the mother's breathing rates to estimate dose for the 3<sup>rd</sup> trimester fetus assuming the dose to the fetus during the 3<sup>rd</sup> trimester is the same as the mother's dose. These age-specific groupings are needed in order to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8). A Tier 1 evaluation uses the high-end point estimate (i.e., the 95<sup>th</sup> percentiles) breathing rates for the inhalation

pathway in order to avoid underestimating cancer risk to the public, including children. A possible exception for using high-end breathing rates are when there is exposure to multipathway substances and two of the non-inhalation pathways drive the risk, rather than the inhalation pathway (see Chapter 8).

**A. Equation 5.4.1.1:**  $\text{Dose-air} = C_{\text{air}} \times \{\text{BR/BW}\} \times A \times \text{EF} \times 10^{-6}$

1. Dose-air = Dose through inhalation (mg/kg/d)
2.  $C_{\text{air}}$  = Concentration in air ( $\mu\text{g}/\text{m}^3$ )
3.  $\{\text{BR/BW}\}$  = Daily Breathing rate normalized to body weight (L/kg body weight - day)
4. A = Inhalation absorption factor (unitless)
5. EF = Exposure frequency (unitless), days/365 days
6.  $10^{-6}$  = Micrograms to milligrams conversion, liters to cubic meters conversion

**a: Recommended default values for EQ 5.4.1.1:**

1.  $\{\text{BR/BW}\}$  = Daily breathing rates by age groupings, see As supplemental information, the assessor may wish to evaluate the inhalation dose by using the mean point estimates in Table 5.6 to provide a range of breathing rates for cancer risk assessment to the risk manager.
2. Table (point estimates) and Table 5.7 (parametric model distributions for Tier III stochastic risk assessment). For Tier 1 residential estimates, use 95<sup>th</sup> percentile breathing rates in Table 5.6.
3. A = 1
4. EF = 0.96 (350 days/365 days in a year for a resident)

**b: Assumption for EQ 5.4.1.1:**

1. The fraction of chemical absorbed (A) is the same fraction absorbed in the study on which the cancer potency or Reference Exposure Level is based.

As supplemental information, the assessor may wish to evaluate the inhalation dose by using the mean point estimates in Table 5.6 to provide a range of breathing rates for cancer risk assessment to the risk manager.

**Table 5.6 Point Estimates of Residential Daily Breathing Rates for 3<sup>rd</sup> trimester, 0<2, 2<9, 2<16, 16<30 and 16-70 years (L/kg BW-day)**

	3 <sup>rd</sup> Trimester <sup>a</sup>	0<2 years	2<9 years	2<16 years	16<30 years	16<70 years
	L/kg-day					
Mean	225	658	535	452	210	185
95th Percentile	361	1090	861	745	335	290

<sup>a</sup> 3<sup>rd</sup> trimester **breathing rates** based on breathing rates of pregnant women using the assumption that the dose to the fetus during the 3rd trimester is the same as that to the mother.

**Table 5.7 Daily Breathing Rate Distributions by Age Group for Residential Stochastic Analysis (L/kg BW-day)**

	3 <sup>rd</sup> Trimester	0<2 years	2<9 years	2<16 years	16<30 years	16-70 years
Distribution	Max extreme	Max extreme	Max extreme	Log-normal	Logistic	Logistic
Minimum	78	196	156	57	40	13
Maximum	491	2,584	1,713	1,692	635	860
Scale	59.31	568.09	125.59		40.92	36.19
Likeliest	191.50	152.12	462.61			
Location				-144.06		
Mean	225	658	535	452	210	185
Std Dev	72	217	168	172	75	67
Skewness	0.83	2.01	1.64	1.11	0.83	1.32
Kurtosis	3.68	10.61	7.88	6.02	5.17	10.83
<b>Percentiles</b>						
5%	127	416	328	216	96	86
10%	142	454	367	259	118	104
25%	179	525	427	331	161	141
50%	212	618	504	432	207	181
75%	260	723	602	545	252	222
80%	273	758	631	572	261	233
90%	333	934	732	659	307	262
95%	361	1090	861	745	335	290
99%	412	1430	1140	996	432	361

#### 5.4.1.2 Offsite Worker (MEIW) Inhalation Dose for Cancer Risk Assessment

For worker exposure, the default assumes working age begins at 16 years, and that exposures to facility emissions occur during the work shift, typically up to 8 hours per day during work days. Breathing rates that occur over an 8-hour period vary depending on the intensity of the activity (See Table 5.8), and are used to estimate the inhalation dose. The 8-hour breathing rates may also be useful for cancer risk assessment of children and teachers exposed at schools during school hours.

Another risk management consideration for the offsite worker scenario for cancer assessment of a Hot Spots facility is whether there are women of child-bearing age at the MEIW location and whether the MEIW has a daycare center. Since the third trimester is only a short segment of the 25 year exposure duration used for the MEIW, the resulting risk estimate would not differ significantly. An exception to this assumption is high exposure to carcinogens over a short period, as might occur during short-term projects (see Section 8.2.10). In this case, risk assessment during the third trimester may be warranted. However, if there is onsite daycare at the MEIW, then the risks to the children will be underestimated using the offsite adult worker scenario due to increased exposure (per kg body weight) and increased sensitivity to carcinogen exposure (see Section 8.2.1). In this case, the Districts may wish to include a calculation of inhalation dose for the children in the onsite daycare, assuming they could be there from 0 to age 6 years.

Exposed workers may be engaged in activities ranging from desk work, which would reflect breathing rates of sedentary/passive or light activities, to farm worker activities, which would reflect breathing rates of moderate intensity (See Table 5.9). OEHHA recommends default (Tier 1) point estimate 8-hour breathing rates in L/kg-8-hrs based on the mean and 95<sup>th</sup> percentile of moderate intensity activities, 170 and 230 L/kg-8-hrs, respectively, for adults 16-70 years old.

Many facilities operate non-continuously, as in only 8-10 hours per day, but the air dispersion modeling is performed as if the emissions were uniformly emitted over 24 hours a day, 7 days per week. The air dispersion computer model used, including AERMOD and other models, typically calculate an annual average air concentration based on actual operating conditions but also include the hours of nonoperation in the average concentration.

Therefore, there are two components that determine the worker exposure to facility emissions:

- 1) What is the estimated concentration the worker is exposed to (i.e., breathes), during the work shift, and
- 2) What is the amount of time the offsite worker's schedule overlaps with the facility's emission schedule?

There are two approaches to estimating the modeled concentration the worker is breathing during the work shift. The first approach uses a worker adjustment factor (i.e.,

the WAF) to approximate what the worker is breathing based on the modeling run used for residential receptors. The second approach uses a special modeling run with the hourly raw results from an air dispersion analysis and is described in Appendix M.

The first and more basic approach is to obtain the long term average concentration as you would for modeling a residential receptor, then adjusting this exposure concentration using the calculated WAF (EQ 5.4.1.2 B) to estimate the concentration the offsite worker is exposed to during the work shift (shown as  $(C_{\text{air}} \times \text{WAF})$  in EQ 5.4.1.2 A). This method is characteristic of a default approach used in a Tier 1 assessment. Once the exposure concentration is determined, the worker's inhalation dose (Dose-air) can be calculated as shown in EQ 5.4.1.2 A.

The second approach for determining the air concentration the worker is exposed to uses a refined modeling run where the hourly raw dispersion model output are post processed to examine the hourly concentrations that fall within the offsite worker's shift. This method provides a more representative estimate of the air concentration, but is more complex, and time consuming than the first method. See Appendix M for information on how to simulate the long term concentration for the offsite worker that can be used to estimate inhalation cancer risk.

The HARP software has the ability to calculate worker impacts using an approximation factor and, in the future, it will have the ability to post process refined worker concentrations using the hourly raw results from an air dispersion analysis.

If the off-site worker's shift does not completely overlap the emission schedule of the facility, then a Discount Factor (DF) may be applied to the WAF. Calculation of the DF is shown in EQ 5.4.1.2 C. The default assumption is that the offsite worker's shift falls completely within the emission schedule of the facility, in which case  $DF=1$ . Use of a DF less than 1 requires a survey at the MIEW to verify that some portion of the off-site worker shift is not subject to the facility emissions.

**A. Equation 5.4.1.2 A:**  $\text{Dose-air} = (C_{\text{air}} \times \text{WAF}) \times \{\text{BR}/\text{BW}\} \times A \times \text{EF} \times 10^{-6}$

1. Dose-air = Dose through inhalation (mg/kg/d)
2.  $C_{\text{air}}$  = Annual average concentration in air ( $\mu\text{g}/\text{m}^3$ )
3. WAF = Worker air concentration adjustment factor (unitless)
4.  $\{\text{BR}/\text{BW}\}$  = Eight-hour breathing rate normalized to body weight (L/kg body weight - day)
5. A = Inhalation absorption factor (unitless)
6. EF = Exposure frequency (unitless), days/365 days)
7.  $10^{-6}$  = Micrograms to milligrams conversion, Liters to cubic meters conversion

**a: Recommended default values for EQ 5.4.1.2 A:**

1. WAF = See EQ. 5.4.1.2 B for formula to calculate WAF, or App. M for refined post-processing modeling to calculate WAF.
2.  $\{\text{BR}/\text{BW}\}$  = For workers, use age 16-70 year, 95<sup>th</sup> percentile, moderate intensity 8-hour point estimate breathing rates (see Table 5.8). No worker breathing rate distributions exist for stochastic risk assessment.
3. A = 1
4. EF = 0.68 (250 days / 365 days). Equivalent to working 5 days/week, 50 weeks/year.

**b: Assumption for EQ 5.4.1.2 A:**

1. The fraction of chemical absorbed (A) through the lungs is the same fraction absorbed in the study on which the cancer potency factor is based.
2. The source emits during the daylight hours. Calculate WAF (EQ 5.4.1.2 B) if a special post-processing modeling run described in App. M was not completed. For nighttime emissions and exposure scenarios, see Appendix N.

**B. Equation 5.4.1.2 B:**

$$\text{WAF} = (H_{\text{res}} / H_{\text{source}}) \times (D_{\text{res}} / D_{\text{source}}) \times \text{DF}$$

1. WAF = Worker adjustment factor (unitless)
2.  $H_{\text{res}}$  = Number of hours per day the annual average residential air concentration is based on (always 24 hours)
3.  $H_{\text{source}}$  = Number of hours the source operates per day
4.  $D_{\text{res}}$  = Number of days per week the annual average residential air concentration is based on (always 7 days)
5.  $D_{\text{source}}$  = Number of days the emitting source operates per week
6. DF = Discount factor, for when the offsite worker's schedule partially overlaps the source's emission schedule

**b: Recommended default values for EQ 5.4.1.2 B:**

1. DF = 1 for offsite worker's schedule occurring within the source's emission schedule. A site-specific survey may be used to adjust the DF using EQ 5.4.1.2 C.

**C. Equation 5.4.1.2 C:**

$$\text{DF} = (H_{\text{coincident}} / H_{\text{worker}}) \times (D_{\text{coincident}} / D_{\text{worker}})$$

1.  $H_{\text{coincident}}$  = Number of hours per day the offsite worker's schedule and the source's emission schedule coincide
2.  $H_{\text{worker}}$  = Number of hours the offsite worker works per day
3.  $D_{\text{coincident}}$  = Number of days per week the offsite worker's schedule and the source's emission schedule coincide
4.  $D_{\text{worker}}$  = Number of days the offsite worker works per week

Tier 2 adjustments for EQ 5.4.1.2 A-C may be used for:

1. Eight-hour breathing rate. Point estimates in Table 5.8 for lower breathing rates of sedentary/passive and light intensity work activities may be substituted in site-specific Tier 2 scenarios. Table 5.9 can be used to estimate breathing rate intensities for various job activities. Use of different breathing rates requires a survey of the exposed workplace and approval by Air District, ARB and OEHHA.
2. Discount Factor (DF) in EQ 5.4.1.2 C. If a site-specific survey of the offsite worker schedule only partially overlaps with the source's emission schedule, then a DF less than 1 may be calculated. Use of a DF less than 1 requires a survey of the exposed workplace and approval by the Air District or ARB.

The 8-hour breathing rates are based on minute ventilation rates derived by U.S. EPA (2009). U.S. EPA employed a metabolic equivalent (METs) approach for estimating breathing rates. This method determines daily time-weighted averages of energy expenditure (expressed as multipliers of the basal metabolic rate) across different levels of physical activity. The 8-hour breathing rates shown in Table 5.8 are divided into three categories:

Sedentary & Passive Activities (METs  $\leq$  1.5)

Light Intensity Activities (1.5 < METs  $\leq$  3.0)

Moderate Intensity Activities (3.0 < METs  $\leq$  6.0)

For example, a METS = 1 is roughly equivalent to energy expenditure during sleep and is close to the basal metabolic rate. A METS activity that is two to three times greater (METS = 2 to 3) is characteristic of light intensity activities, such as administrative office work or sales work as shown in Table 5.9.

Under a Tier 1 scenario, the risk assessor may simply use the 95<sup>th</sup> percentile breathing rate for moderate intensity activities of 230 L/kg-8 hrs in Eq. 5.4.1.2 A to calculate the daily dose via the inhalation route to the worker. In an example of a Tier 2 scenario, the risk assessor surveys the workplace and determines that the worker(s) at the MEIW receptor are primarily sitting at a desk performing administrative-type work on a computer. Referring to Table 5.9, this activity corresponds most closely to “administrative office work” with a mean activity level of 1.7 and a SD = 0.3. This level of activity is considered “light intensity activity” (i.e., 1.5 < METs  $\leq$  3.0). With the prior approval of the Air District or ARB, the risk assessor may then use the 95<sup>th</sup> percentile breathing rate of 100 L/kg-8 hr for light intensity activities in Equation 5.4.1.2 A.

**Table 5.8. Eight-Hour Breathing Rate (L/kg per 8 Hrs) Point Estimates for Males and Females Combined<sup>a,b</sup>**

	0<2 years	2<9 years	2<16 years	16<30 years	16-70 years
<b>Sedentary &amp; Passive Activities (METs <math>\leq</math> 1.5)</b>					
Mean	200	100	80	30	30
95 <sup>th</sup> Percentile	250	140	120	40	40
<b>Light Intensity Activities (1.5 &lt; METs <math>\leq</math> 3.0)</b>					
Mean	490	250	200	80	80
95 <sup>th</sup> Percentile	600	340	270	100	100
<b>Moderate Intensity Activities (3.0 &lt; METs <math>\leq</math> 6.0)</b>					
Mean	890	470	380	170	170
95 <sup>th</sup> Percentile	1200	640	520	240	230

<sup>a</sup> For pregnant women, OEHHA recommends using the mean and 95<sup>th</sup> percentile 8-hour breathing rates based on moderate intensity activity of 16<30 year-olds for 3rd trimester.

<sup>b</sup> Breathing rates in the table may be used for worker, school, or residential exposures

**Table 5.9. METS Distributions for Workplace and Home Activities**

Activity Description	Mean	Median	SD	Min	Max
<b>Workplace Activities</b>					
Administrative office work	1.7	1.7	0.3	1.4	2.7
Sales work	2.9	2.7	1.0	1.2	5.6
Professional	2.9	2.7	1.0	1.2	5.6
Precision/production/craft/repair	3.3	3.3	0.4	2.5	4.5
Technicians	3.3	3.3	0.4	2.5	4.5
Private household work	3.6	3.5	0.8	2.5	6.0
Service	5.2	5.3	1.4	1.6	8.4
Machinists	5.3	5.3	0.7	4.0	6.5
Farming activities	7.5	7.0	3.0	3.6	17.0
Work breaks	1.8	1.8	0.4	1.0	2.5
<b>Household/Neighborhood Activities</b>					
Sleep or nap	0.9	0.9	0.1	0.8	1.1
Watch TV	1.0	1.0	-	1.0	1.0
General reading	1.3	1.3	0.2	1.0	1.6
Eat	1.8	1.8	0.1	1.5	2.0
Do homework	1.8	1.8	-	1.8	1.8
General personal needs and care	2.0	2.0	0.6	1.0	3.0
Indoor chores	3.4	3.0	1.4	2.0	5.0
Care of plants	3.5	3.5	0.9	2.0	5.0
Clean house	4.1	3.5	1.9	2.2	5.0
Home repairs	4.7	4.5	0.7	4.0	6.0
General household chores	4.7	4.6	1.3	1.5	8.0
Outdoor chores	5.0	5.0	1.0	2.0	7.0
Walk/bike/jog (not in transit) age 20	5.8	5.5	1.8	1.8	11.3
Walk/bike/jog (not in transit) age 30	5.7	5.7	1.2	2.1	9.3
Walk/bike/jog (not in transit) age 40	4.7	4.7	1.8	2.3	7.1

Table 5.10 lists some WAFs for a few typical scenarios. For example, if the source is continuously emitting, then the offsite worker is assumed to breathe the long-term annual average concentration during their work shift. The WAF then becomes one and no concentration adjustments are necessary in this situation when estimating the inhalation cancer risk. If the source is non-continuously emitting for 8 hours/day, 5 days/week and the offsite worker's shift completely overlaps the emitting facility's operating schedule, then the WAF would be 4.2:

$$(24 \text{ hrs/day} / 8 \text{ hrs/day}) \times (7 \text{ days/week} / 5 \text{ days/week}) = 4.2$$

If the offsite worker's 8 hour/day shift only overlaps the emitting facility's operation schedule for 4 hrs/day, then the WAF is 2.1 because the DF = 0.5 will reduce the WAF by half:  $DF = (4 \text{ hrs/day} / 8 \text{ hrs/day}) \times (5 \text{ days/week} / 5 \text{ days/week}) = 0.5$

**Table 5.10: Example Worker Adjustment Factors (WAF) to Convert a Long-Term Daily Average Emission Concentration to an Off-Site Worker Receptor Exposure**

Off-Site Workers' Shift Overlap with Facility's Emission Schedule <sup>a</sup>	Facility Operating Schedule	Adjustment Factor
8 hrs/day, 5 days/week	Continuous (24 hrs/7 days/week)	1.0
8 hrs/day, 5 days/week <sup>b</sup>	Non-continuous (8 hrs/5 days/week)	4.2
4 hrs/day, 5 days/week	Non-continuous (8 hrs/5 days/week)	2.1

<sup>a</sup> Worker works 8 hours per day, 5 days per week

<sup>b</sup> Workers' work hours completely overlap the facilities operating hours

#### 5.4.1.3 Inhalation Dose for Children at Schools and Daycare Facilities for Cancer Risk Assessment

The 8-hour breathing rates and inhalation dose equations (EQ 5.4.1.2 A-C) may also be used to estimate risk to children when exposures occur while at school or at day care facilities. Breathing rate point estimates to use in Table 5.8 depend on the ages of the children at the exposed schools and day cares. As a Tier 1 default, moderate intensity breathing rates are recommended. Equations 5.4.1.2 A-C is used in the same way to estimate dose in children as it is for workers.

#### 5.4.1.4 Non-Cancer Inhalation Exposure for Workers and Residents

For typical daily work shifts of 8-9 hours, acute, 8-hour and chronic Reference Exposure Levels (RELs) described in Chapter 8 are used in health risk assessments to characterize the noncancer risks using the Hazard Index approach described in Chapter 8 and in OEHHA (2008). Uncertainty factors are already incorporated into the RELs used to assess noncancer risk, as explained in Chapter 8, so all that is needed to evaluate the noncancer hazard is the air concentration that the worker is exposed to. The modeled maximum 1-hour air concentration is determined for acute hazard assessment and the annual average air concentration is determined for chronic hazard assessment. The modeled average air concentration during a work shift is determined for 8-hour hazard assessment using the adjusted annual average air concentration described below.

The 8-hour RELs are primarily designed to address offsite worker inhalation exposure at the MEIW because they better characterize the daily intermittent exposures of workers than the chronic RELs do. They are used in estimating the 8 hour Hazard Index for offsite workers. The 8-hour RELs should be used for typical daily work shifts of 8-9 hours. For further questions, assessors should contact OEHHA, the District, or reviewing authority to determine if the 8-hour RELs should be used in your HRA. Any discussions or directions to exclude the 8-hour REL evaluation should be documented in the HRA.

Note, however, there are only a handful of 8-hour RELs currently adopted for use in the Hot Spots program. Therefore, we also recommend performing chronic noncancer exposure assessment for the offsite worker (MEIW) based on the annual average air concentration at the MEIW. Evaluation of the chronic Hazard Index should help protect workers who routinely work longer than 8 hour shifts. Exposure to multipathway substances also requires noncancer hazard assessment for the dermal and oral soil exposure pathways for offsite workers. Because there are few 8-hour RELs currently available, hazard assessment for the noninhalation pathways for multipathway substances is only applied when estimating the chronic Hazard Index.

In addition, the Districts may wish to determine if there is an onsite daycare at the MEIW and include a calculation of the chronic and 8-hour inhalation dose for children, although onsite hazard assessment is not a requirement for a Hot Spots risk assessment.

As explained in Section 5.4.1.2 for cancer risk, the modeled annual average air concentration is adjusted to the air concentration that the worker is actually exposed to if the facility operates non-continuously. The typical method for this adjustment is by calculating the Worker Adjustment Factor (WAF) shown in EQ 5.4.1.4 B and multiplying this value by the annual average air concentration ( $C_{air}$ , in  $\mu\text{g}/\text{m}^3$ ) in EQ 5.4.1.4 A.

Unlike cancer risk assessment, no discount factor (DF) is applied in noncancer assessment for partial overlap between the worker's schedule and the source's emission schedule. Adjustments for worker vacations, work shifts for shortened weeks (e.g., 1 - 4 days), and worker time away on weekends are also not appropriate.

An alternative refined post-processing method, described in Appendix M, may be used to estimate the air concentration the worker is exposed to during their work schedule. OEHHA may be consulted about the particular chemical involved if it is important to make a more refined analysis.

The equation to adjust the annual average air concentration to a worker 8-hour exposure concentration (i.e., the adjusted annual average ground level concentration) is expressed as:

**A. Equation 5.4.1.4 A:**

$$\text{Adjusted } C_{air} (\mu\text{g}/\text{m}^3) = C_{air} \times \text{WAF}$$

Where WAF is determined as:

**B. Equation 5.4.1.4 B:**

$$\text{WAF} = (H_{res} / H_{source}) \times (D_{res} / D_{source})$$

**a: Assumptions for EQ 5.4.1.4 B:**

1. No adjustment of the WAF allowed for partial overlap of the worker's schedule and the source's emission schedule.

Alternatives for calculating off-site worker Adjusted  $C_{air}$  in EQ 5.4.1.4 A-B:

1. Rather than calculate the WAF for a non-continuous emitting facility, a post-processing of the hourly raw dispersion model output and examination of the hourly concentrations that fall within the offsite worker's shift can be conducted to estimate the air concentration the worker is exposed to. This method is a more refined, complex, and time consuming approach, but should result in a more representative exposure concentration. See Appendix M for information on how to simulate the exposure concentration for the off-site worker.
2. For continuously-emitting facilities (i.e., 24 hrs/day, 7 days/week), if an assessor does not wish to assume the worker breathes the long-term annual average concentration during the work shift, then a refined concentration can also be post-processed as described in Appendix M. All alternative assumptions should be approved by the reviewing authority and supported in the presentation of results.

For residential exposure to non-continuously operating facilities, the modeled maximum 1-hour and chronic air concentrations at the MEIR are determined for noncancer hazard assessment. Hazard assessment for repeated 8-hour exposure at the MEIR is not required. Chronic exposure assessment based on the annual average air concentration should adequately protect individuals, in part because residents are considered to be present at the MEIR at or near 24 hrs per day. Many facilities operate for periods longer than 8 hours per day and the hazards are better characterized based on chronic exposure. Nevertheless, differences between 8-hour and chronic exposures (i.e., higher daily 8-hour exposures vs. lower longer daily exposure 24 hrs/day) may result in different toxicological responses including potentially greater toxicological responses with either 8-hour or chronic exposure. There may also be cases such as special meteorological situations (e.g., significant diurnal-nocturnal meteorological differences) where the 8-hour REL will be more protective than the chronic REL. Thus, the air districts may also elect to have an 8-hour hazard assessment performed at the MEIR, using daily 8 hour exposures and the 8 hr RELs.

Eight-hour exposure assessment is not recommended for continuously emitting sources for residential receptors. In this situation it is only necessary to estimate chronic exposure based on the annual average concentration. However, there may be situations where the air district may wish to assess an 8-hour residential exposure to continuously operating facilities, for example, where there are significant differences in modeled concentration of emissions during the day due to diurnal wind patterns.

For estimating the air concentration from non-continuously operating facilities, EQ 5.4.1.4.A is also used to adjust the annual average concentration to what the residents are exposed to. This is the air concentration that the 8-hour REL will be compared to as discussed in Chapter 8. The alternative refined post-processing method described in Appendix M may also be used to estimate residential exposure.

In summary, the requirements for noncancer hazard assessment using the Hazard Index approach at the MEIW and MEIR are as follows.

For offsite worker exposure:

- Acute hazard assessment based on the maximum 1-hour air concentrations and 1-hour RELs
- Eight-hour hazard assessment based on daily average 8-hour exposure (estimated using adjusted annual average air concentration in EQ 5.4.1.4 A and B or by post-processing method in App. M) for those substances with 8-hour RELs
- Chronic hazard assessment based on annual average exposure and chronic RELs, and oral chronic RELs for noninhalation routes of multipathway substances

For residential exposure:

- Acute hazard assessment based on the maximum 1-hour air concentration and 1-hour RELs
- Eight-hour hazard assessment based on daily average 8-hour exposure not required, but can be performed at the discretion of the air districts for exposure to non-continuously operating facilities based on the adjusted annual average air concentration (EQ 5.4.1.4 A and B or method in App. M). Eight-hour assessments not recommended for exposure to continuously operating facilities
- Chronic hazard assessment based on annual average exposure and chronic RELs, and oral chronic RELs for noninhalation routes of multipathway substances

#### 5.4.1.5 Exposure Frequency and Age Groupings for Noncancer Hazard Assessment

For cancer risk, the basic assumption is that risk is associated with cumulative dose of carcinogen. Thus, the dose used to estimate cancer risk can be adjusted for exposure frequency, as well as time spent within the MEIR or MEIW location. Chronic RELs are not necessarily related to cumulative dose. Thus, adjusting the estimated dose used to calculate hazard index for exposure frequency or time away from the MEIR or MEIW is not appropriate.

The average daily dose for chronic noncancer assessment is based on exposure beginning at birth to 70 years of age, necessitating calculation of a time-weighted average for age 0-2, 2-16 and 16-70 years. Since we are not applying Age Sensitivity Factors for assessing non-cancer hazard, the 3<sup>rd</sup> trimester is not explicitly called out for determining dose, as it is for cancer risk assessment. Rather adult exposure is considered, which would include pregnant women in any trimester. Both inhalation and oral RELs incorporate safety factors to protect sensitive human populations.

#### **5.4.2 Estimation of Exposure through Dermal Absorption**

Exposure through dermal absorption (dose-dermal) is a function of the soil or dust loading of the exposed skin surface, the amount of skin surface area exposed, and the concentration and availability of the substance. In the previous edition of OEHHA's

exposure guidelines document (OEHHA, 2000), we recommended using specified average and high-end point estimate values for four of the variates (body weight, exposed surface area of skin, soil load on skin and frequency of exposure) in the stochastic analysis for dermal dose. This equation required multiplying values together, which could lead to overly conservative exposure estimates when high-end values were used. By combining information from the four variates into one composite distribution, over-conservatism may be avoided.

To this end, OEHHA created a new variate, “annual dermal load”, or ADL, which is a composite of the body surface area (BSA) per kg body weight, exposure frequency, and soil adherence variates. Point estimates from the composite “annual dermal load” can be used for point estimate assessments while parameters and information on the type of distribution (e.g., lognormal) can be used for Tier III stochastic risk assessments. For details on the development of the ADL, refer to the Technical Support Document for Exposure and Stochastic Analysis (OEHHA, 2012).

#### 5.4.2.1 Dermal Dose for Cancer Risk Assessment

The dose through residential dermal exposure to contaminated soil varies by age and is calculated for each age group (e.g., 3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 and 16-70 yrs). These age-specific groupings are needed in order to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8). This pathway is also assessed for exposure to offsite workers; a separate ADL for offsite workers is presented in Table 5.11. Children at a MEIW daycare, if present, may also be assessed for exposure if the District deems it advisable.

#### **A. Equation 5.4.2.1:**

$$\text{Dose}_{\text{dermal}} = \text{ADL} \times C_s \times \text{ABS} \times 10^{-9} / 365$$

1.  $\text{Dose}_{\text{dermal}}$  = Exposure dose through dermal absorption (mg/kg-d)
2. ADL = Annual dermal load (mg soil/kg BW-yr)
3.  $C_s$  = Average soil concentration ( $\mu\text{g}/\text{kg}$ )
4. ABS = Fraction absorbed across skin (unitless)
5.  $10^{-9}$  = Conversion factor for chemical & soil ( $\mu\text{g}$  to mg, mg to kg)
6.  $1/365$  = Conversion factor for ADL from yrs to days

#### **a: Recommended default values for EQ 5.4.2.1:**

1. ADL = See Table 5.11 (point estimates) & Table 5.12 a-d (distributions)
2.  $C_s$  = Calculated above in EQ 5.3.2 A
3. ABS = See Table 5.13

#### **b: Assumption for EQ 5.4.2.1:**

1. The ADL for the third trimester of the fetus is based on the ADL of the mother; when normalized to body weight, we assume that exposure to the

mother and the fetus will be the same. The mother's exposure is based on that of adults 16-30 years of age in Table 5.11 and 5.12d.

2. Exposure frequency (EF) for vacation time spent away from exposure does not appear as a variate in EQ 5.4.2.1, as it is incorporated in the ADL and includes a 2-week vacation per year away from dermal soil exposure for both residents and offsite workers.

Climate will strongly influence people's choice of clothing. Due to California's varied climatic regions and existing data on clothing choices at different temperatures, three levels of climatic conditions, warm, mixed, and cold, are used to describe California's climate regions:

1. A warm climate is characteristic of Southern California areas such as Los Angeles, which can have warm to hot temperatures throughout the year.
2. A "mixed" climate is one that has warm-to-hot temperatures during much of the year (daily highs over 80 degrees are common), roughly from April to October, and cold temperatures (lows near or below freezing) during the remainder of the year. The mountains and central valley are examples of a mixed climate.
3. A cold climate is representative of San Francisco, Eureka, and other northern coastal communities, which have cool temperatures (daily highs of less than 65 degrees) for the majority of the year and can receive a considerable amount of fog and rainfall.

OEHHA recommends consulting the local air district for assistance on selecting the most appropriate climate.

**Table 5.11 Recommended Annual Dermal Load Point Estimates (in mg/kg-yr) for Dermal Exposure**

	3 <sup>rd</sup> Trimester <sup>a</sup>	Children 0<2 yrs	Children 2<9 yrs	Children 2<16 yrs	Adults <sup>b</sup>	Offsite Worker <sup>c</sup>
<b>Warm climate</b>						
Mean	1.2 x 10 <sup>3</sup>	3.6 x 10 <sup>3</sup>	7.5 x 10 <sup>3</sup>	6.4 x 10 <sup>3</sup>	1.2 x 10 <sup>3</sup>	2.6 x 10 <sup>3</sup>
95 <sup>th</sup> percentile	2.6 x 10 <sup>3</sup>	4.3 x 10 <sup>3</sup>	9.1 x 10 <sup>3</sup>	8.5 x 10 <sup>3</sup>	2.6 x 10 <sup>3</sup>	5.0 x 10 <sup>3</sup>
<b>Mixed climate</b>						
Mean	1.1 x 10 <sup>3</sup>	2.2 x 10 <sup>3</sup>	6.6 x 10 <sup>3</sup>	5.7 x 10 <sup>3</sup>	1.1 x 10 <sup>3</sup>	2.6 x 10 <sup>3</sup>
95 <sup>th</sup> percentile	2.4 x 10 <sup>3</sup>	2.9 x 10 <sup>3</sup>	8.7 x 10 <sup>3</sup>	8.1 x 10 <sup>3</sup>	2.4 x 10 <sup>3</sup>	5.0 x 10 <sup>3</sup>
<b>Cold climate</b>						
Mean	0.7 x 10 <sup>3</sup>	1.2 x 10 <sup>3</sup>	3.1 x 10 <sup>3</sup>	2.8 x 10 <sup>3</sup>	0.7 x 10 <sup>3</sup>	2.6 x 10 <sup>3</sup>
95 <sup>th</sup> percentile	2.1 x 10 <sup>3</sup>	1.9 x 10 <sup>3</sup>	5.2 x 10 <sup>3</sup>	5.1 x 10 <sup>3</sup>	2.1 x 10 <sup>3</sup>	5.0 x 10 <sup>3</sup>

<sup>a</sup> The ADL for the 3rd trimester of the fetus is based on the ADL of the mother; when normalized to body weight, we assume that exposure to the mother and the fetus will be the same

<sup>b</sup> Residential adult ADLs are for both 16<30 and 16-70 year age groups

<sup>c</sup> Assumes exposure only to face, hands and forearms regardless of climate region

**Tables 5.12a - d Annual Dermal Load Distributions by Age Group  
and Climate for Stochastic Analysis**

**Table 5.12a Annual Dermal Load (mg/kg-yr) Distributions for the  
0<2 Year Age Group**

Climate Type	Warm climate	Mixed climate	Cold climate
Distribution	Student's t	Logistic	Triangular
Minimum			$0.2 \times 10^3$
Likeliest			$0.7 \times 10^3$
Maximum			$2.6 \times 10^3$
Scale	0.41	0.28	
Deg. freedom	3		
Midpoint	$3.6 \times 10^3$		
Mean	$3.6 \times 10^3$	$2.2 \times 10^3$	$1.2 \times 10^3$
50 <sup>th</sup> percentile	$3.6 \times 10^3$	$2.2 \times 10^3$	$0.9 \times 10^3$
90 <sup>th</sup> percentile	$4.1 \times 10^3$	$2.8 \times 10^3$	$1.9 \times 10^3$
95 <sup>th</sup> percentile	$4.3 \times 10^3$	$2.9 \times 10^3$	$1.9 \times 10^3$
99 <sup>th</sup> percentile	$4.7 \times 10^3$	$3.1 \times 10^3$	$2.1 \times 10^3$

**Table 5.12b Annual Dermal Load (mg/kg-yr) Distributions for the  
2<9 Year Age Group**

Climate Type	Warm climate	Mixed climate	Cold climate
Distribution	Min extreme	Min extreme	Triangular
Minimum			$0.4 \times 10^3$
Likeliest	$8.0 \times 10^3$	$7.3 \times 10^3$	$1.9 \times 10^3$
Maximum			$6.9 \times 10^3$
Scale	0.1	1.3	
Mean	$7.5 \times 10^3$	$6.6 \times 10^3$	$3.1 \times 10^3$
50 <sup>th</sup> percentile	$7.7 \times 10^3$	$6.5 \times 10^3$	$2.3 \times 10^3$
90 <sup>th</sup> percentile	$8.7 \times 10^3$	$8.4 \times 10^3$	$5.1 \times 10^3$
95 <sup>th</sup> percentile	$9.1 \times 10^3$	$8.7 \times 10^3$	$5.2 \times 10^3$
99 <sup>th</sup> percentile	$9.7 \times 10^3$	$9.4 \times 10^3$	$5.7 \times 10^3$

**Table 5.12c Annual Dermal Load (mg/kg-yr) Distributions for the 2<16 Year Age Group**

Climate Type	Warm climate	Mixed climate	Cold climate
Distribution	Min extreme	Logistic	Triangular
Minimum			$0.3 \times 10^3$
Likeliest	$7.2 \times 10^3$		$1.6 \times 10^3$
Maximum			$6.9 \times 10^3$
Scale	1.29	0.91	
Mean	$6.4 \times 10^3$	$5.7 \times 10^3$	$2.8 \times 10^3$
50 <sup>th</sup> percentile	$6.6 \times 10^3$	$5.7 \times 10^3$	$2.2 \times 10^3$
90 <sup>th</sup> percentile	$8.1 \times 10^3$	$7.7 \times 10^3$	$4.8 \times 10^3$
95 <sup>th</sup> percentile	$8.5 \times 10^3$	$8.1 \times 10^3$	$5.1 \times 10^3$
99 <sup>th</sup> percentile	$9.3 \times 10^3$	$8.9 \times 10^3$	$5.6 \times 10^3$

**Table 5.12d Annual Dermal Load (mg/kg-yr) Distributions for Residential Adults (Age 16-30 and 16-70 Years)<sup>a</sup> and Offsite Workers**

Receptor	Residential Adult			Offsite Worker
Climate Type	Warm	Mixed	Cold	All Climates <sup>b</sup>
Distribution	Beta	Beta	Gamma	Lognormal
Minimum	$0.2 \times 10^3$	$0.02 \times 10^3$		
Maximum	$3.3 \times 10^3$	$0.3 \times 10^3$		
Scale			0.07	
Mean	$1.2 \times 10^3$	$1.1 \times 10^3$	$0.7 \times 10^3$	$2.6 \times 10^3$
50 <sup>th</sup> percentile	$1.2 \times 10^3$	$1.0 \times 10^3$	$0.5 \times 10^3$	$2.3 \times 10^3$
90 <sup>th</sup> percentile	$2.4 \times 10^3$	$2.1 \times 10^3$	$1.6 \times 10^3$	$4.5 \times 10^3$
95 <sup>th</sup> percentile	$2.6 \times 10^3$	$2.4 \times 10^3$	$2.1 \times 10^3$	$5.0 \times 10^3$
99 <sup>th</sup> percentile	$2.9 \times 10^3$	$2.6 \times 10^3$	$2.3 \times 10^3$	$6.4 \times 10^3$

<sup>a</sup> The ADL distribution for the 3rd trimester is based on the ADL distribution of the mother; we assume the same ADL distribution for residential adult (the mother) and the fetus

<sup>b</sup> Face, hands and forearms are exposed only, regardless of climate

**Table 5.13 Dermal Absorption Fraction Factors (ABS) as Percent from Soil for Semi-Volatile and Solid Chemicals under the OEHHA “Hot Spots” Program**

<b>Chemical</b>	<b>ABS</b>
<b><i>Inorganic chemicals</i></b>	
Arsenic	6
Beryllium	3
Cadmium	0.2
Chromium (VI)	2
Fluorides (soluble compounds)	3
Lead	3
Mercury	4
Nickel	2
Selenium	3
<b><i>Organic chemicals</i></b>	
Creosotes	13
Diethylhexylphthalate	9
Hexachlorobenzene	4
Hexachlorocyclohexanes	3
4,4'methylene dianiline	10
Pentachlorophenol	<sup>a</sup>
Polychlorinated biphenyls	14
Polychlorinated dibenzo-p-dioxins and dibenzofurans	3
Polycyclic aromatic hydrocarbons	13

<sup>a</sup> To be determined in future amendments to the Hot Spots Program

Skin permeability is related to the solubility or strength of binding of the chemical in the delivery matrix (soil or other particles) versus the receptor matrix, the skin's stratum corneum. Fractional dermal absorption point estimate values were derived by OEHHA from available literature sources for the semi-volatile and nonvolatile chemicals in the “Hot Spots” program. The rationale for the chemical-specific dermal absorption fraction values, and the use of default values in cases where sufficient data are lacking, can be found in Appendix F of the Technical Support Document for Exposure and Stochastic Analysis (OEHHA, 2012).

#### 5.4.2.2 Chronic Noncancer Dermal Dose

Dermal exposure, and thus annual dermal load (ADL), varies by age group. Therefore, a time-weighted average ADL for age 0-70 years (0-2, 2-16, and 16-70 years) is estimated for chronic residential exposure using ADL values in Table 5.12. This exposure pathway is also assessed for offsite workers using the offsite worker ADL values in Table 5.12d. Children at a MEIW daycare, if present, may also be assessed for exposure if the District deems it advisable. The contribution to the dermal dose is determined for each age group in EQ 5.4.2.2:

**A. Equation 5.4.2.2:**  $\text{Dose}_{\text{dermal}} = \text{ADL} \times \text{Cs} \times \text{ABS} \times 10^{-9} \times \text{ED}/\text{AT} \times (1/350)$

1.  $\text{Dose}_{\text{dermal}}$  = Exposure dose through dermal absorption (mg/kg/d)
2. ADL = Annual dermal load (mg/kg-yr), age-specific
3. Cs = Average soil concentration ( $\mu\text{g}/\text{kg}$ )
4. ABS = Fraction absorbed across skin (unitless)
5.  $10^{-9}$  = Conversion factor for chemical & soil ( $\mu\text{g}$  to mg, mg to kg)
6. 1/350 = Conversion factor for ADL from yrs to days (Note: this conversion is needed to remove EF, expressed as 350 days/365 days, from the ADLs in Table 5.12a-d)
7. ED = Exposure duration for specified age groups: 2 yrs for 0<2, 14 yrs for 2<16, 54 yrs for 16-70 for residential exposure,
8. AT = Averaging time for residential exposure – 70 yrs

**a: Recommended default values for EQ 5.4.2.2:**

1. ADL = See Table 5.11 for point estimates by age group, climate region and receptor type (resident or worker)
2. Cs = Calculated above in EQ 5.3.2 A
3. ABS = See Table 5.13

**b: Recommended off-site worker default modifications to EQ 5.4.2.2:**

1. Chronic dermal dose to the off-site worker assumes only adult exposure and is incorporated into the off-site worker ADL in Table 5.12d.
2. A time-weighted average estimate of dose is not necessary and the ED and AT variates are left out of EQ 5.4.2.2 for dermal dose to the worker.

**c: Recommended nursing mother default modifications to EQ 5.4.2.2:**

1. For dermal dose to mother's milk, use the ADL for age 16-30 years in Table 5.12d.
2. The ED and AT variates in EQ 5.4.2.2 are left out for dermal dose in the mother's milk pathway.

**d: Assumptions for EQ 5.4.2.2:**

1. For cancer risk assessment, Exposure Frequency (EF) for vacation time away from exposure is incorporated into the ADLs shown in Tables 5.11 and 5.12 using the basic assumption that cancer risk is associated with cumulative dose of carcinogen. The dose used to estimate cancer risk can be adjusted for EF, and for time spent within the MEIR or MEIW location. Chronic RELs are not necessarily related to cumulative dose. Thus, adjusting the estimated dose for EF at the MEIR or MEIW is not appropriate, and the unadjusted daily rate is used in EQ 5.4.2.2.
2. For worker exposure, the annual average concentration should not be adjusted to account for worker and facility emission schedules, as done for

inhalation cancer risk assessment. The pollutant will be deposited and accumulate in the soil in the absence or presence of the worker; therefore, the total deposition and soil concentration will be dependent on the annual average air concentration.

For residential chronic exposure, the dermal dose contribution for each age group is summed together to obtain the time-weighted average daily dermal dose for chronic hazard assessment:

$$\begin{aligned} & (\text{ADL age } 0 < 2 \times C_s \times \text{ABS} \times 10^{-9} \times 2 / 70 \times (1/350)) + \\ & (\text{ADL age } 2 < 16 \times C_s \times \text{ABS} \times 10^{-9} \times 14 / 70 \times (1/350)) + \\ & (\text{ADL age } 16 - 70 \times C_s \times \text{ABS} \times 10^{-9} \times 54 / 70 \times (1/350)) = \text{Chronic Dose}_{\text{dermal}} \end{aligned}$$

### 5.4.3 Estimation of Exposure through Ingestion

Exposure through ingestion is a function of the concentration of the substance in the ingested soil, water, and food, the gastrointestinal absorption of the substance, and the amount ingested.

#### 5.4.3.1 Exposure through Ingestion of Soil

There are no distributions for soil ingestion currently recommended. Tier III stochastic risk assessments should include a high-end point estimate of soil ingestion, soil loading, exposure frequency and soil area.

##### 5.4.3.1.1 *Soil Ingestion Dose for Cancer Risk*

The exposure dose through residential soil ingestion varies by age and is calculated for each age group ((e.g., 3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 and 16-70 yrs). These age-specific groupings are needed in order to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8). This pathway is also assessed for exposure to off-site workers. Children at a MEIW daycare, if present, may also be assessed for exposure if the District deems it advisable. The dose from inadvertent soil ingestion can be estimated by the point estimate approach using the following general equation:

**A. Equation 5.4.3.1.1:** 
$$\text{DOSE}_{\text{soil}} = C_{\text{soil}} \times \text{GRAF} \times \text{SIR} \times 10^{-9} \times \text{EF}$$

1.  $\text{DOSE}_{\text{soil}}$  = Dose from soil ingestion (mg/kg BW-day)
2.  $10^{-9}$  = Conversion factor ( $\mu\text{g}$  to mg, mg to kg)
3.  $C_{\text{soil}}$  = Concentration of contaminant in soil ( $\mu\text{g}/\text{kg}$ )
4. GRAF = Gastrointestinal relative absorption fraction, chemical-specific (unitless)
5. SIR = Soil ingestion rate (mg/kg BW-day)
6. EF = Exposure frequency (unitless), (days/365 days)

**a: Recommended default values for EQ 5.4.3.1.1:**

1.  $C_{\text{soil}}$  = Calculated above in EQ 5.3.2 A
2. GRAF = See Table 5.2
3. SIR = See Table 5.14
4. EF = 350 d/year resident, 250 d/year worker

In this approach, it is assumed that the soil ingested contains a representative concentration of the contaminant(s) and the concentration is constant over the exposure period.

The term **GRAF**, or gastrointestinal relative absorption factor, is defined as the fraction of contaminant absorbed by the GI tract relative to the fraction of contaminant absorbed from the matrix (feed, water, other) used in the study(ies) that is the basis of either the cancer potency factor (CPF) or the Reference Exposure Level (REL). If no data are available to distinguish absorption in the toxicity study from absorption from the environmental matrix in question (i.e., soil), then  $\text{GRAF} = 1$ . The GRAF allows for adjustment for absorption from a soil matrix if it is known to be different from absorption across the GI tract in the study used to calculate the CPF or REL. In most instances, the GRAF will be 1.

**Table 5.14 Recommended Soil Ingestion Rate (SIR) Estimates for Adults and Children (mg/kg-day)\***

Age Groups (years)	Mean (mg/kg-day)	95 <sup>th</sup> % (mg/kg-day)
3rd Trimester <sup>a</sup>	0.7	3
0<2	20	40
2<9	5	20
2<16	3	10
16<30	0.7	3
16 to 70	0.6	3
PICA adult	NR	-

<sup>a</sup> Assumed to be the mother's soil ingestion rate (adult age 16 <30)

\* Soil includes outdoor settled dust

NR = No recommendation

#### 5.4.3.1.2 Chronic Noncancer Dose for Soil Ingestion

The soil ingestion rate varies by age. A time-weighted average approach is used to combine soil intake rates of the age groupings (i.e., 0<2 yrs, 2<16 yrs, and 16-70 yrs) to determine the residential soil ingestion dose for chronic noncancer hazard assessment. This pathway is also assessed for exposure to offsite workers using the adult intake values for age 16-70 years in Table 5.14. Children at a MEIW daycare, if present, may also be assessed for exposure if the District deems it advisable. The contribution to the soil ingestion dose by each age group is determined in EQ 5.4.3.1.2:

**A. Equation 5.4.3.1.2:**  $\text{DOSE}_{\text{soil}} = C_{\text{soil}} \times \text{GRAF} \times \text{SIR} \times 10^{-9} \times \text{ED}/\text{AT}$

1.  $\text{DOSE}_{\text{soil}}$  = Dose from soil ingestion (mg/kg BW-day)
2.  $10^{-9}$  = Conversion factor ( $\mu\text{g}$  to mg, mg to kg)
3.  $C_{\text{soil}}$  = Concentration of contaminant in soil ( $\mu\text{g}/\text{kg}$ )
4. GRAF = Gastrointestinal relative absorption fraction, unitless; chemical-specific
5. SIR = Soil ingestion rate (mg/kg BW-day)
6. ED = Exposure duration for a specified age group: 2 yrs for 0<2, 14 yrs for 2<16, 54 yrs for 16-70
7. AT = Averaging time for lifetime exposure – 70 yrs

**a: Recommended default values for EQ 5.4.3.1.2:**

1.  $C_{\text{soil}}$  = Calculated above in EQ 5.3.2 A
2. GRAF = See Table 5.2
3. SIR = See Table 5.14; use 16-70 age group SIR for workers

**b: Recommended off-site worker default modifications to EQ 5.4.3.1.2:**

1. A time-weighted average estimate of dose is not necessary and the ED and AT variates are left out of EQ 5.4.3.1.2 for oral soil dose to the worker.

**c: Recommended nursing mother default modifications to EQ 5.4.3.1.2:**

1. For mother's ingested soil dose to milk, use the SIR for age 16-30 years in Table 5.14.
2. The ED and AT variates in EQ 5.4.3.1.2 are left out for soil ingestion dose in the mother's milk pathway.

**d: Assumptions for EQ 5.4.3.1.2:**

1. For worker exposure, the annual average concentration should not be adjusted to account for overlap of worker and facility emission schedules. The pollutant will be deposited and accumulate in the soil in the absence or presence of the worker; therefore, the total deposition and soil concentration will be dependent on the annual average air concentration.

For residential exposure, the soil ingestion dose contribution for each age group is summed together to obtain the time-weighted average daily soil intake dose for chronic hazard assessment:

$$(\text{SIR for age } 0 < 2 \text{ yrs} \times C_{\text{soil}} \times \text{GRAF} \times 10^{-9} \times 2 / 70) +$$

$$(\text{SIR for age } 2 < 16 \text{ yrs} \times C_{\text{soil}} \times \text{GRAF} \times 10^{-9} \times 14 / 70) +$$

$$(\text{SIR for age } 16 - 70 \text{ yrs} \times C_{\text{soil}} \times \text{GRAF} \times 10^{-9} \times 54 / 70) = \text{Chronic Dose}_{\text{soil}}$$

**5.4.3.2 Exposure through Ingestion of Food**

The exposure through food ingestion can be through ingestion of home-grown plant products (categorized as leafy, protected, exposed and root produce), home-raised animals (categorized as meat, cow's milk and eggs), angler-caught fish and mother's milk. When a specific food pathway is a dominant pathway (e.g., homegrown produce), and multiple pathways such as home raised meat, milk, and eggs categories all need to be assessed, the 95<sup>th</sup> percentile default consumption rate for the driving exposure pathway is used, while the mean consumption values for the remaining exposure pathways (i.e., food categories) are used. See Section 8.2.6 for a complete discussion of the methodology on how to implement the derived methodology.

**5.4.3.2.1 *Dose for Cancer Risk from Home-Grown Produce***

Exposure through ingesting home-grown produce (DOSE<sub>p</sub>) is a function of the type of crop (i.e., exposed, leafy, protected, root), gastrointestinal relative absorption factor, bioavailability and the fraction of plant ingested that is homegrown. The calculation is done for each type of crop, then summed to get total dose for this pathway. The

exposure dose through ingestion of home-grown produce varies by age and is calculated for each age group (e.g., 3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 and 16-70 yrs). These age-specific groupings are needed in order to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8).

**A. Equation 5.4.3.2.1:**

$$\text{DOSEp} = C_v \times \text{IP} \times \text{GRAF} \times L \times \text{EF} \times 10^{-6}$$

1. DOSEp = Exposure dose through ingestion of home-grown produce (mg/kg/d)
2.  $C_v$  = Concentration in specific type of crop, i.e., exposed, leafy, protected, root ( $\mu\text{g}/\text{kg}$ )
3. IP = Consumption of specific type of crop (g/kg BW\*day)
4. GRAF = Gastrointestinal relative absorption factor (unitless)
5. L = Fraction of plant type consumed that is home-grown or locally grown (unitless)
6. EF = Exposure frequency (unitless, days/365 days)
7.  $10^{-6}$  = Conversion factors ( $\mu\text{g}/\text{kg}$  to mg/g)

**a: Recommended default values for Equation 5.4.3.2.1:**

1.  $C_v$  = Calculated above in EQ 5.3.4.1 A
2. IP = See Table 5.15 (point estimates) and 5.16a-e (distributions)
3. GRAF = See Table 5.2
4. L = Site-specific survey is recommended. Otherwise, see Table 5.17 for Tier I default values
5. EF = 0.96 (350 d/365 d in a yr)

Once the dose for each type of crop that applies is calculated (See Section 5.3.4.1 for definition of crops types), the doses are summed to get the total dose for the home-grown produce pathway:

$$\text{Total DOSEp} = \text{DOSEp (leafy)} + \text{DOSEp (root)} + \text{DOSEp (exposed)} + \text{DOSEp (protected)}$$

The total home-grown produce dose will need to be calculated for each age group that applies.

**5.4.3.2.2 Dose for cancer risk from home-raised meat, eggs, and cow's milk**

Exposure through ingesting home-raised or farm animal products ( $\text{DOSE}_{\text{fa}}$ ) is a function of the type of food (meat, eggs and cow's milk), gastrointestinal relative absorption factor, bioavailability and the fraction of food ingested that is home-raised. The only meat sources considered here are beef, pork and poultry. Unlike the home-grown produce pathway, the dose is calculated and presented separately for each type of home-raised food. The age-specific groupings to determine dose (3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 yrs or 16-70 yrs) is needed in order to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8).

**A. Equation 5.4.3.2.2:**

$$\text{DOSE}_{\text{fa}} = C_{\text{fa}} \times I_{\text{fa}} \times \text{GRAF} \times L \times \text{EF} \times 10^{-6}$$

1.  $\text{DOSE}_{\text{fa}}$  = Exposure dose through ingestion of home-raised animal product (mg/kg/d)
2.  $C_{\text{fa}}$  = Concentration in animal product, e.g., beef, pork, poultry, dairy, eggs ( $\mu\text{g}/\text{kg}$ )
3.  $I_{\text{fa}}$  = Consumption of animal product (g/kg BW-day)
4. GRAF = Gastrointestinal relative absorption factor (unitless)
5. L = Fraction of animal product consumed that is home-raised or locally produced (unitless)
6. EF = Exposure frequency (unitless, days/365 days)
7.  $10^{-6}$  = Conversion factors ( $\mu\text{g}/\text{kg}$  to mg/g)

**a: Recommended default values for EQ 5.4.3.2.2:**

1.  $C_{\text{fa}}$  = Calculated above in EQ 5.3.4.2 A
2.  $I_{\text{fa}}$  = See Table 5.15 (point estimates) and Table 5.16a-e (distributions)
3. GRAF = See Table 5.2
4. L = Site-specific survey is recommended. Otherwise, see Table 5.17 for Tier I default values
5. EF = 0.96 (350 days / 365 days in a year)

**5.4.3.2.3 Chronic Noncancer Dose for Ingestion of Food**

For oral noncancer hazard assessment, a time-weighted average approach is used to combine food ingestion rates for the age groups (i.e., 0<2, 2<16 and 16-70 yrs) to estimate the chronic dose for residential exposure. The equation used to estimate dose through home-grown produce and home-raised meat/eggs/cow's milk is similar and is shown below in one equation. Similar to the cancer risk dose calculation, home-grown produce is presented as a total dose for all types of crops (See Section 5.4.3.2.1) and home-raised animal product dose is presented separately for each type of animal product that applies (See Section 5.4.3.2.2).

The contribution to the food intake dose is determined for each age group in EQ 5.4.3.2.3:

**A. Equation 5.4.3.2.3:**  $\text{DOSE}_{\text{food}} = C_{\text{food}} \times I_{\text{food}} \times \text{GRAF} \times L \times 10^{-6} \times \text{ED}/\text{AT}$

1.  $\text{DOSE}_{\text{food}}$  = Exposure dose through ingestion of home-grown produce or home-raised animal product (mg/kg/d)
2.  $C_{\text{food}}$  = Concentration ( $\mu\text{g}/\text{kg}$ ) in produce (e.g., exposed, leafy, protected, root) or animal product (e.g., beef, pork, poultry, dairy, eggs)
3.  $I_{\text{food}}$  = Consumption of produce or animal product (g/kg BW-day)
4. GRAF = Gastrointestinal relative absorption factor (unitless)
5. L = Fraction of produce or animal product consumed that is home-grown (unitless)
6.  $10^{-6}$  = Conversion factors ( $\mu\text{g}/\text{kg}$  to mg/g)
7. ED = Exposure duration for a specified age group (2 yrs for 0<2, 14 yrs for 2<16, 54 yrs for 16-70)
8. AT = Averaging time for lifetime exposure: 70 yrs

**a: Recommended default values for EQ 5.4.3.2.3:**

1.  $C_{\text{food}}$  = Calculated above in EQ 5.3.4.1 A (for home-grown produce) or EQ 5.3.4.2 A (for home-raised animal products)
2.  $I_{\text{food}}$  = Age-specific, see Table 5.15 for point estimates
3. GRAF = See Table 5.2
4. L = Site-specific survey is recommended. Otherwise, see Table 5.17 for Tier I default values

**b: Recommended nursing mother default modifications to EQ 5.4.3.2.3:**

1. For the mother's dose to milk through ingested food, use the food intake rates for age 16-30 years in Table 5.15 and 5.16d.
2. The ED and AT variates in EQ 5.4.3.2.3 are left out for ingested food dose in the mother's milk pathway.

Following calculation of the intake dose contributions for each age group, the intake rates for home-grown produce and the intake rates for home-raised animal products are summed separately to obtain the residential time-weighted average intake dose for chronic residential exposure to home-grown produce and to home-raised animal products:

$$(I_{\text{food}} \text{ for age } 0<2 \text{ yrs} \times C_{\text{food}} \times \text{GRAF} \times L \times 10^{-6} \times 2 / 70) +$$

$$(I_{\text{food}} \text{ for age } 2<16 \text{ yrs} \times C_{\text{food}} \times \text{GRAF} \times L \times 10^{-6} \times 14 / 70) +$$

$$(I_{\text{food}} \text{ for age } 16-70 \text{ yrs} \times C_{\text{food}} \times \text{GRAF} \times L \times 10^{-6} \times 54 / 70) = \text{Chronic Dose}_{\text{food}}$$

**Table 5.15 Recommended Average and High End Point Estimate Values for Home Produced Food Consumption (g/kg-day)**

Food Category	Third Trimester		Ages 0<2		Ages 2<9	
	Avg.	High End	Avg.	High End	Avg.	High End
Produce						
Exposed	1.9	5.9	11.7	30.2	7.4	21.7
Leafy	0.9	3.2	3.8	10.8	2.5	7.9
Protected	1.7	5.8	5.9	17.5	4.7	13.3
Root	1.7	4.6	5.7	15.3	3.9	10.8
Meat						
Beef	2.0	4.8	3.9	11.3	3.5	8.6
Poultry	0.9	2.9	2.9	10.5	2.2	7.8
Pork	1.8	4.7	4.5	11.4	3.7	9.0
Milk	5.4	15.9	50.9	116	23.3	61.4
Eggs	1.6	4.2	6.1	15.0	3.9	9.4
	Ages 2>16		Ages 16<30		Ages 16-70	
	Avg.	High End	Avg.	High End	Avg.	High End
Produce						
Exposed	1.9	5.9	1.9	5.9	1.8	5.6
Leafy	0.9	3.2	0.9	3.2	1.1	3.4
Protected	1.7	5.8	1.7	5.8	1.6	5.2
Root	1.7	4.6	1.7	4.6	1.5	4.2
Meat						
Beef	2.0	4.8	2.0	4.8	1.7	4.4
Poultry	0.9	2.9	0.9	2.9	0.9	2.8
Pork	1.8	4.7	1.8	4.7	1.5	3.8
Milk	5.4	15.9	5.4	15.9	4.3	13.2
Eggs	1.6	4.2	1.6	4.2	1.3	3.4

<sup>a</sup> Food consumption values for 3<sup>rd</sup> trimester calculated by assuming that the fetus receives the same amount of contaminated food on a per kg BW basis as the mother (adult age 16 to less than 30).

**Table 5.16a - e Parametric Models of Per Capita Food Consumption by Age Group for Stochastic Analysis****Table 5.16a Per Capita Food Consumption (g/kg-day) for Ages 0<2**

Food Category	Distrib. Type	Anderson-Darling Statistic	Mean	Std. Dev	Location	Scale	Shape	Like-liest
Produce								
Exposed	Gamma	60			0.01	6.56	0.830	
Leafy	Gamma	167			0.01	3.30	1.161	
Protected	LogN	67	6.03	7.31				
Root	Gamma	83			0.06	4.44	1.28	
Meat								
Beef	LogN	16	1.97	1.73				
Poultry	LogN	58	4.5	4.08				
Pork	LogN	230	3.00	4.46				
Dairy	Max Ext.	169				27.82		33.79
Eggs	LogN	172	6.11	4.21				

**Table 5.16b Per Capita Food Consumption (g/kg-day) for Ages 2<9**

Food Category	Distribution Type	Anderson-Darling Statistic	Mean	Std. Dev	Location	Scale	Shape	Rate
Produce								
Exposed	Exponential	206						0.14
Leafy	LogN	127	2.64	3.89				
Protected	Weibull	68			0.02	4.76	1.063	
Root	LogN	60	3.95	3.85				
Meat								
Beef	LogN	35	3.55	2.79				
Poultry	LogN	17	3.71	2.67				
Pork	LogN	66	2.25	2.84				
Milk	LogN	12	23.4	20.78				
Eggs	LogN	38	3.93	3.00				

**Table 5.16c Per Capita Food Consumption (g/kg-day) for Ages 2<16**

Food Category	Distribution Type	Anderson-Darling Statistic	Mean	Std. Dev	Location	Scale	Shape
Produce							
Exposed	Gamma	60			0.01	6.54	0.8325
Leafy	LogN	68	1.83	2.91			
Protected	Gamma	47			0.00	3.69	0.9729
Root	LogN	51	3.10	3.44			
Meat							
Beef	LogN	10	2.96	2.49			
Poultry	LogN	27	2.98	2.52			
Pork	LogN	48	1.84	2.79			
Milk	LogN	35	16.8	19.2			
Eggs	LogN	71	3.16	2.95			

**Table 5.16d Per Capita Food Consumption (g/kg-day) for Ages 16-30<sup>a</sup>**

Food Category	Distribution Type	Anderson-Darling Statistic	Mean	Std. Dev	Location	Scale	Shape
Produce							
Exposed	Gamma	70			0.01	2.05	0.9220
Leafy	Weibull	191			0.00	0.88	0.8732
Protected	LogN	93	1.81	3.31			
Root	LogN	43	1.69	1.69			
Meat							
Beef	LogN	26	1.98	1.54			
Poultry	LogN	26	1.80	1.42			
Pork	LogN	242	1.01	1.74			
Milk	Gamma	22			0.02	5.66	0.9421
Eggs	LogN	29	1.55	1.36			

<sup>a</sup> These distributions are also recommended for the third trimester. Food consumption values for 3<sup>rd</sup> trimester are calculated by assuming that the fetus receives the same amount of contaminated food on a per kg BW basis as the mother (adult age 16<30).

**Table 5.16e Per Capita Food Consumption (g/kg-day) for Ages 16-70**

Food Category	Distribution Type	Anderson-Darling Statistic	Mean	Std. Dev	Location	Scale	Shape
Produce							
Exposed	Gamma	148			0.01	2.07	0.8628
Leafy	Gamma	83			0.00	1.15	0.9713
Protected	Gamma	78			0.01	1.90	0.8325
Root	Gamma	14			0.00	1.28	1.166
Meat							
Beef	LogN	20	1.75	1.40			
Poultry	LogN	18	1.53	1.18			
Pork	LogN	190	0.97	1.59			
Milk	Gamma	20			0.00	4.50	0.9627
Eggs	LogN	30	1.3	1.01			

**Table 5.17 Default Values for L in EQs 5.4.3.2.1., 5.4.3.2.2 and 5.4.3.2.3: Fraction of Food Intake that is Home-Produced**

Food Type	Households that Garden <sup>a</sup>	Households that Farm <sup>a</sup>
Avg. Total Veg & Fruits	0.137	0.235
	Households that Garden/Hunt <sup>b</sup>	Households that Farm <sup>b</sup>
Beef	0.485	0.478
Pork	0.242	0.239
Poultry	0.156	0.151
Eggs	0.146	0.214
Total Dairy (Cow's milk)	0.207	0.254

<sup>a</sup> As a default for home-produced leafy, exposed, protected and root produce, OEHHA recommends 0.137 as the fraction of produce that is home-grown. The households that grow their own vegetables and fruits are the population of concern. In rural situations where the receptor is engaged in farming, OEHHA recommends 0.235 as the default value for fraction of leafy, exposed, protected and root produce that is home-grown.

<sup>b</sup> OEHHA recommends the fraction home-raised under "Households that raise animals/hunt" (for beef, pork, poultry (chicken), eggs and dairy (cow's milk), with the exception of rural household receptors engaged in farming. OEHHA recommends that the fractions listed under "Households that farm" be used for the rural household receptors.

#### 5.4.3.3 Exposure through Ingestion of Water

Intake of drinking water varies by age on a ml per kg body weight per day basis resulting in differences in exposure dose by age. The age-specific groupings to determine dose are needed in order to properly use the age sensitivity factors for

cancer risk assessment (see Chapter 8) and to calculate a time-weighted average dose for chronic noncancer assessment.

#### 5.4.3.3.1 Dose for Cancer Risk through Ingestion of Water

DOSE<sub>water</sub> is calculated for each age group (i.e., 3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 yrs and 16-70 yrs), then incorporated into EQ 8.2.5 in Chapter 8 to determine cancer risk through exposure in drinking water.

**A. Equation 5.4.3.3.1:** 
$$\text{DOSE}_{\text{water}} = C_w \times \text{WIR} \times \text{ABS}_{\text{swa}} \times \text{Fdw} \times \text{EF} \times 10^{-6}$$

1. DOSE<sub>water</sub> = Exposure dose through ingestion of water (mg/kg BW/d)
2. C<sub>w</sub> = Water concentration (µg/L)
3. WIR = Water ingestion rate (ml/kg BW-day)
4. ABS<sub>swa</sub> = Gastrointestinal relative absorption factor (unitless)
5. Fdw = Fraction of drinking water from contaminated source
6. EF = Exposure frequency (unitless, days/365 days)
7. 10<sup>-6</sup> = Conversion factors (mg/µg)(L/ml)

#### **a: Recommended default values for EQ 5.4.3.3.1:**

1. C<sub>w</sub> = Calculated above 5.3.3 A
2. WIR = See 5.18 (point estimates) and Table 5.19 (distributions)
3. ABS<sub>swa</sub> = Default set to 1
4. Fdw = Default set to 1, although a site-specific survey is recommended for this variate
5. EF = 0.96 (350 days/365 days in a year)

#### 5.4.3.3.2 Chronic Noncancer Dose through Ingestion of Water

Because water intake varies by age group, a time-weighted average intake approach is used to determine the daily water ingestion dose for chronic residential exposure. The contribution to the water ingestion dose is determined for each age group (i.e., 0<2, 2<16 and 16-70 yrs) in EQ 5.4.3.3.2.

**A. Equation 5.4.3.3.2:**

$$\text{DOSE}_{\text{water}} = C_w \times \text{WIR} \times \text{ABS}_{\text{swa}} \times \text{Fdw} \times 10^{-6} \times \text{ED/AT}$$

1.  $\text{DOSE}_{\text{water}}$  = Exposure dose through ingestion of water (mg/kg BW/d)
2.  $C_w$  = Water concentration ( $\mu\text{g/L}$ )
3. WIR = Water ingestion rate (ml/kg BW-day)
4.  $\text{ABS}_{\text{swa}}$  = Gastrointestinal absorption factor
5. Fdw = Fraction of drinking water from contaminated source (site-specific)
6.  $10^{-6}$  = Conversion factors (mg/ $\mu\text{g}$ )(L/ml)
7. ED = Exposure duration for a specified age group: 2 yrs for 0<2, 14 yrs for 2<16, 54 yrs for 16-70
8. AT = Averaging time for residential exposure: 70 yrs

**a: Recommended default values for EQ 5.4.3.3.2:**

1.  $C_w$  = Calculated above in 5.3.3 A
2. WIR = See 5.18 (point estimates)
3.  $\text{ABS}_{\text{swa}}$  = Default set to 1
4. Fdw = Default set to 1, although a site-specific survey is recommended for this variate

**b: Recommended nursing mother default modifications to EQ 5.4.3.3.2:**

1. For the dose to mother's milk through water ingestion, use the WIR for age 16-30 years in Table 5.18.
2. The ED and AT variates in EQ 5.4.3.3.2 are left out for ingested water dose in the mother's milk pathway.

The water intake dose contribution for each age group is summed together to obtain the time-weighted average daily residential water ingestion dose:

$$(\text{WIR for age } 0<2 \text{ yrs} \times C_w \times \text{ABS}_{\text{swa}} \times \text{Fdw} \times 10^{-6} \times 2 / 70) +$$

$$(\text{WIR for age } 2<16 \text{ yrs} \times C_w \times \text{ABS}_{\text{swa}} \times \text{Fdw} \times 10^{-6} \times 14 / 70) +$$

$$(\text{WIR for age } 16-70 \text{ yrs} \times C_w \times \text{ABS}_{\text{swa}} \times \text{Fdw} \times 10^{-6} \times 54 / 70) = \text{Chronic Dose}_{\text{water}}$$

**Table 5.18 Recommended Point Estimate  
Tap Water Intake Rates (ml/kg-day)**

Point Estimates				
Using Mean Values	For the Age Period	9-year scenario	30-year scenario	70-year scenario
	3 <sup>rd</sup> trimester	18	18	18
	0<2 years	113	113	113
	2<9 years	26	-	-
	2<16 years	-	24	24
	16-30 years	-	18	-
	16-70 years	-	-	18
Using 95 <sup>th</sup> -percentile values	For the Age Period	9-year scenario	30-year scenario	70-year scenario
	3 <sup>rd</sup> trimester	47	47	47
	0<2 years	196	196	196
	2<9 years	66	-	-
	2<16 years	-	61	61
	16-30 years	-	47	-
	16-70 years	-	-	45

**Table 5.19 Recommended Distributions of Tap Water Intake Rates  
(ml/kg-day) for Stochastic Risk Assessment**

	9-year scenario	30-year scenario	70-year scenario
0<2 years	<b>Max Extreme</b> Likeliest = 93 Scale = 35	<b>Max Extreme</b> Likeliest = 93 Scale = 35	<b>Max Extreme</b> Likeliest = 93 Scale = 35
2<9 years	<b>Weibull</b> Location = 0.02 Scale = 29 Shape = 1.3		
2<16 years		<b>Gamma</b> Location = 0.19 Scale = 15.0 Shape = 1.6	<b>Gamma</b> Location = 0.19 Scale = 15.0 Shape = 1.6
16-30 years		<b>Gamma</b> location=0.49 scale=13.6 shape=1.26	
16-70 years			<b>Beta</b> min=0.17 max=178 alpha=1.5 beta= 12.9

#### 5.4.3.4 Exposure through Ingestion of Angler-caught Fish

Exposure through ingestion of angler-caught fish ( $DOSE_{fish}$ ) is a function of the fraction of fish ingested that is caught in the exposed water body, which differs for each age grouping, and the gastrointestinal absorption factor. Ingestion of angler-caught fish on a mg/kg body weight per day basis varies by age resulting in differences in exposure dose by age. The age-specific groupings to determine dose is needed primarily to properly use the age sensitivity factors for cancer risk assessment (see Chapter 8) and to calculate a time-weighted average dose for chronic noncancer assessment.

##### 5.4.3.4.1 *Cancer Risk Dose via Ingestion of Angler-Caught Fish*

$DOSE_{fish}$  is calculated for each age group separately (i.e., 3rd trimester, 0<2 yrs, 2<9 yrs, 2<16 yrs, 16<30 yrs and 16-70 yrs), then incorporated into EQ 8.2.5 in Chapter 8 to determine cancer risk through exposure to angler-caught fish.

**A. Equation 5.4.3.4.1:**  $DOSE_{fish} = C_t \times I_{fish} \times Gf \times L \times EF \times 10^{-6}$

1.  $DOSE_{fish}$  = Dose via ingestion of angler-caught fish (mg/kg BW-day)
2.  $C_t$  = Concentration in fish muscle tissue ( $\mu\text{g}/\text{kg}$ )
3.  $I_{fish}$  = Angler-caught fish ingestion rate (g/kg BW per day)
4.  $Gf$  = Gastrointestinal absorption factor (unitless)
5.  $L$  = Fraction of fish caught at exposed site (unitless)
6.  $EF$  = Exposure frequency (days/365 days)
7.  $10^{-6}$  = Conversion factor (mg/ $\mu\text{g}$ , kg/g)

##### **a: Recommended default values for Equation 5.4.3.4.1:**

1.  $C_t$  = Calculated above in Equation 5.3.4.7
2.  $I_{fish}$  = See Table 5.20 (point estimates) and Table 5.21 (distributions)
3.  $Gf$  = Default set to 1
4.  $L$  = Default set to 1 for fraction of fish caught locally, although a site-specific survey is recommended for this variate
5.  $EF$  = 0.96 (350 days/365 days in a yr)

##### 5.4.3.4.2 *Chronic Noncancer Dose via Ingestion of Angler-Caught Fish*

Angler-caught fish consumption varies by age group. A time-weighted average intake for residential consumption over 70 years is used to determine dose for average and high-end exposure. The contribution to the angler-caught fish consumption dose is determined for each age group in EQ 5.4.3.4.2:

**A. Equation 5.4.3.4.2:**  $\text{DOSE}_{\text{fish}} = C_t \times I_{\text{fish}} \times Gf \times L \times 10^{-6} \times \text{ED}/\text{AT}$ 

1.  $\text{DOSE}_{\text{fish}}$  = Dose via ingestion of angler-caught fish (mg/kg BW-day)
2.  $C_t$  = Concentration in fish muscle tissue ( $\mu\text{g}/\text{kg}$ )
3.  $I_{\text{fish}}$  = Angler-caught fish ingestion rate (g/kg BW per day)
4.  $Gf$  = Gastrointestinal absorption factor (unitless)
5.  $L$  = Fraction of fish caught at exposed site (unitless)
6.  $10^{-6}$  = Conversion factor (mg/ $\mu\text{g}$ , kg/g)
7.  $\text{ED}$  = Exposure duration for a specified age group: 2 yrs for 0<2, 14 yrs for 2<16 and 54 yrs for 16-70
8.  $\text{AT}$  = Averaging time for chronic exposure – 70 yrs

**a: Recommended default values for Equation 5.4.3.4.2:**

1.  $C_t$  = Calculated above in Equation 5.3.4.7
2.  $I_{\text{fish}}$  = See Table 5.20 (point estimates)
3.  $Gf$  = Default set to 1
4.  $L$  = Default set to 1 for fraction of fish caught locally, although a site-specific survey is recommended for this variate

**b: Recommended nursing mother default modifications to EQ 5.4.3.4.2:**

1. For the dose to mother's milk through fish consumption, use the  $I_{\text{fish}}$  for age 16-30 years in Table 5.20.
2. The  $\text{ED}$  and  $\text{AT}$  variates in EQ 5.4.3.4.2 are left out for the dose via fish consumption in the mother's milk pathway.

Following calculation of the angler-caught fish consumption dose contribution for each age group, 0<2 yr, 2<16 yr and 16-70 yr fish consumption doses are summed together to obtain the residential chronic dose:

$$(\text{I}_{\text{fish}} \text{ for age } 0<2 \text{ yrs} \times C_t \times Gf \times L \times 10^{-6} \times 2 / 70) +$$

$$(\text{I}_{\text{fish}} \text{ for age } 2<16 \text{ yrs} \times C_t \times Gf \times L \times 10^{-6} \times 14 / 70) +$$

$$(\text{I}_{\text{fish}} \text{ for age } 16-70 \text{ yrs} \times C_t \times Gf \times L \times 10^{-6} \times 54 / 70) = \text{Chronic Dose}_{\text{fish}}$$

**Table 5.20 Point Estimate Values for Angler-Caught Fish Consumption (g/kg-day) by Age Group**

	Third Trimester	0 <2 Years	2<9 Years	2<16 Years	16<30 Years	16-70 Years
Mean	0.38	0.18	0.36	0.36	0.38	0.36
95 <sup>th</sup> Percentile	1.22	0.58	1.16	1.16	1.22	1.16

**Table 5.21 Empirical Distribution for Angler-Caught Fish Consumption (g/kg-day)**

Mean	Percentile									
	10 <sup>th</sup>	20 <sup>th</sup>	30 <sup>th</sup>	40 <sup>th</sup>	50 <sup>th</sup>	60 <sup>th</sup>	70 <sup>th</sup>	80 <sup>th</sup>	90 <sup>th</sup>	95 <sup>th</sup>
<b>Third trimester, 2&lt;9, 2&lt;16, 16&lt;30 and 16-70-year age groups</b>										
0.36	0.06	0.09	0.12	0.16	0.21	0.27	0.36	0.50	0.79	1.16
<b>0&lt;2-year age group</b>										
0.18	0.03	0.05	0.06	0.08	0.11	0.14	0.18	0.25	0.40	0.58

#### 5.4.3.5 Mother's Milk

Exposure through mother's milk ingestion (Dose-Im) is a function of the average concentration of the substance in mother's milk and the amount of mother's milk ingested. The minimum pathways that the nursing mother is exposed to include inhalation, soil ingestion, and dermal, since the chemicals evaluated by the mother's milk pathway are multipathway chemicals. Other pathways may be appropriate depending on site conditions (e.g., the presence of vegetable gardens or home grown chickens). The compounds currently considered for the mother's milk pathway are:

1. Dioxins and Furans (PCDDS and PCDFs)
2. Polychlorinated biphenyls (PCBs)
3. Polycyclic Aromatic Hydrocarbons (PAHs), including creosotes
4. Lead

These compound classes represent the chemicals of greatest concern for the mother's milk pathway under the Hot Spots program, and for which data are available to estimate transfer coefficients. It is expected that additional transfer coefficients will be developed for other multipathway chemicals in the Hot Spots Program as data becomes available and is reviewed. The nursing mother in the mother's milk pathway is not herself subject to the mother's milk pathway. The summed average daily dose (mg/kg BW-day) from all pathways is calculated for the nursing mother using the equations that follow.

5.4.3.5.1 *Cancer Risk Dose to Infant via Mother's Milk***A. Equation 5.4.3.5.1:**

$$\text{Dose-Im} = C_m \times \text{BMI}_{\text{bw}} \times \text{EF} \times 10^{-3}$$

1. Dose-Im = Dose to infant through ingestion of mother's milk (mg/kg BW per day)
2.  $C_m$  = Concentration of contaminant in mother's milk (mg/kg milk)
3.  $\text{BMI}_{\text{bw}}$  = Daily breast-milk ingestion rate (g/kg BW-day)
4. EF = Frequency of exposure (days / 365 days)
5.  $10^{-3}$  = Conversion factor (kg to g)

**a: Recommended default values for EQ 5.4.3.5.1:**

1.  $C_m$  = See EQ 5.3.4.8
2.  $\text{BMI}_{\text{bw}}$  = See Table 5.22 for point estimates. For distribution (parametric model) for Tier 3 stochastic risk assessments see Table 5.23.
3. EF = 1 (all 365 days of the first year of birth)

**b: Assumptions for EQ 5.4.3.5.1:**

1. For the MEIR, mother is exposed from birth up to 25 years of age when the infant is born. The exposed infant is then fully breastfed only during the first year of life.
2. For cancer risk assessment, exposure of breast-feeding infants to contaminants in breast milk applies only to the first year of the 0<2 yr age group for calculation of risk to this group, which then can be summed with the risk calculated for the other age groups (See Chapter 8).

5.4.3.5.2 *Chronic Noncancer Dose to Infant via Mother's Milk*

For oral noncancer hazard assessment, exposure of the infant through mother's milk ingestion occurs during the first year of life. After one year of age, the mother's milk pathway is not a factor for noncancer assessment.

**A. Equation 5.4.3.5.2:**

$$\text{Dose-Im} = C_m \times \text{BMI}_{\text{bw}} \times 10^{-3}$$

1. Dose-Im = Dose to infant through ingestion of mother's milk (mg/kg BW/d)
2.  $C_m$  = Concentration of contaminant in mother's milk (mg/kg milk)
3.  $\text{BMI}_{\text{bw}}$  = Daily breast-milk ingestion rate (g/kg BW-day)
4.  $10^{-3}$  = Conversion factor (kg to g)

**a: Recommended default values for EQ 5.4.3.5.2:**

1.  $C_m$  = See EQ 5.3.4.8
2.  $\text{BMI}_{\text{bw}}$  = See Table 5.22 for point estimates

**Table 5.22 Default Point Estimates for Breast Milk Intake ( $\text{BMI}_{\text{bw}}$ ) for Breastfed Infants**

Infant Group	Intake (g/kg-day)
<i>Fully breastfed over the first year (i.e., fed in accordance with AAP recommendations)</i>	
Mean	101
95 <sup>th</sup> percentile	139

**Table 5.23 Recommended Distribution of Breast Milk Intake Rates Among Breastfed Infants for Stochastic Assessment\* (Averaged Over an Individual's First Year of Life)**

	Mean (SD)	Percentile							
		5	10	25	50	75	90	95	99
Intake (g/kg-day)	101 (23)	62	71	85	101	116	130	139	154

\* For stochastic analysis, the mother's milk data are normally distributed.

## 5.5 References

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## 6 - Dose-Response Assessment for Noncarcinogenic Endpoints

### 6.1 Derivation of Toxicity Criteria for Noncancer Health Effects

Dose-response assessment describes the quantitative relationship between the amount of exposure to a substance (the dose) and the incidence or occurrence of an adverse health impact (the response). Dose-response information for noncancer health effects is used to determine Reference Exposure Levels (RELs). Inhalation RELs are air concentrations or doses at or below which adverse noncancer health effects are not expected even in sensitive members of the general population under specified exposure scenarios. The acute RELs are for infrequent 1 hour exposures that occur no more than once every two weeks in a given year, although this time frame of exposure does not necessarily apply to chemicals that can bioaccumulate (e.g., dioxins and furans, PCBs, and various metals). The chronic RELs are for 24 hour per day exposures for at least a significant fraction of a lifetime, defined as about 8 years ( $\geq 12$  percent of a 70-year lifespan). The 8-hour RELs are for repeated 8-hour exposures for a significant fraction of a lifetime such as the exposures that offsite workers might typically receive. Eight-hour RELs are only available for 10 chemicals at present, but OEHHA will develop 8-hour RELs as we re-evaluate our existing RELs to ensure they are protective of children's health, and as we develop RELs for new chemicals. There are oral chronic RELs for some chemicals in the Hot Spots program that are semivolatile or nonvolatile and thus subject to deposition and oral ingestion or dermal exposure. The methodology for developing RELs is similar to that used by U.S. EPA in developing the inhalation Reference Concentrations (RfCs) and oral Reference Doses (RfDs).

Review and revision of RELs to take into account new information and sensitive subpopulations including infants and children is an ongoing process. All draft RELs for individual chemicals revised under the current noncancer methodology will undergo public comment and peer review, as mandated by the Hot Spots Act.

The first step in determining an acute, 8-hour, or chronic REL is to determine a point of departure. The point of departure is preferably determined by the benchmark concentration procedure applied to human or animal studies, but if this method of calculation cannot be used with a particular data set, a no observed adverse effect level (NOAEL) or lowest observed adverse effect level (LOAEL) may be used as the point of departure. The benchmark concentration method (also referred to as the benchmark dose method for oral exposures) is a preferred method to estimate a point of departure because it takes all of the available dose-response data into account to statistically estimate, typically, a 5 percent response rate.

Dosimetric or toxicokinetic adjustments are often made to the point of departure to adjust for differences in dosimetry or kinetics across species or among humans. Time adjustments are generally applied to adjust experimental exposure to the exposure of

interest for the REL (e.g., 1 hour for acute, continuous for chronic). A modified Haber's equation is used where needed to adjust studies with different exposure times to the one-hour period needed for acute RELs. A simple Haber's law ( $C \times T$ ) adjustment for exposure period duration is used for most 8-hour and chronic RELs.

The time and dosimetry adjusted point of departure is divided by uncertainty factors that reflect the limitations in the current toxicology of the chemical. For example, an interspecies uncertainty factor is applied to account for the differences between humans and animals when an animal study is used. An intraspecies uncertainty factor is usually included to account for differences in susceptibility among the human population. In addition, where benchmark dose modeling is not suitable and a NOAEL is not available, a LOAEL to NOAEL uncertainty factor may be applied when the LOAEL serves as the point of departure. If a chronic study is not available to serve as a basis for a chronic REL, then a subchronic uncertainty factor (for chronic and 8-hour RELs only) may also be applied. Finally, if there are data deficiencies, for example, lack of a developmental toxicity study for a chemical, then a database deficiency factor may be applied. The individual uncertainty factors, which range from 2 to 10 depending on the limitations in the data, are multiplied together for a total uncertainty factor. The point of departure is then divided by the total UF to obtain the REL.

The most sensitive toxicological end point is selected as the basis for the REL when there are multiple adverse health effects. The selection of the most sensitive endpoint as the basis for a REL helps ensure that the REL is protective for all health effects. The use of uncertainty factors helps ensure that the REL is protective for nearly all individuals, including sensitive subpopulations, within the limitations of current scientific knowledge. For detailed information on the methodology and derivations for RELs, including guidance on selection of uncertainty factors, see the Air Toxics Hot Spots Risk Assessment Guidelines Technical Support Document for the Derivation of Noncancer Reference Exposure Levels (OEHHA, 2008).

It should be emphasized that exceeding the acute or chronic REL does not necessarily indicate that an adverse health impact will occur. The REL is not the threshold where population health effects would first be seen. However, levels of exposure above the REL have an increasing but undefined probability of resulting in an adverse health impact, particularly in sensitive individuals (e.g., depending on the toxicant, the very young, the elderly, pregnant women, and those with acute or chronic illnesses). The significance of exceeding the REL is dependent on the seriousness of the health endpoint, the strength and interpretation of the health studies, the magnitude of combined safety factors, and other considerations. In addition, there is a possibility that a REL may not be protective of certain small, unusually sensitive human subpopulations. Such subpopulations can be difficult to identify and study because of their small numbers, lack of knowledge about toxic mechanisms, and other factors. It may be useful to consult OEHHA staff when a REL is exceeded (hazard quotient or hazard index is greater than 1.0). Chapter 8 discusses the methods used for determining potential noncancer health impacts and Appendix I presents example calculations used to determine a hazard quotient (HQ) and hazard indices (HI).

Tables 6.1 through 6.3 list the currently adopted acute, 8-hour, and chronic inhalation RELs. Some substances that pose a long-term inhalation hazard may also present a chronic hazard via non-inhalation (oral, dermal) routes of exposure. The oral RELs for these substances are presented in Table 6.3. Appendix L provides a consolidated listing of all the acute, 8-hour, and chronic RELs with the respective target organs that are approved for use by OEHHA and ARB for the Hot Spots Program. Periodically, new or updated RELs are adopted by OEHHA and these guidelines will be updated to reflect those changes. See OEHHA's web site at [www.oehha.ca.gov](http://www.oehha.ca.gov) (look under "Air", then select "Hot Spots Guidelines") to determine if any new or updated RELs have been adopted since the last guideline update.

## 6.2 Acute Reference Exposure Levels

OEHHA developed acute RELs for assessing potential noncancer health impacts for short-term, one-hour peak exposures to facility emissions (OEHHA, 2008; <http://www.oehha.ca.gov/air/allrels.html>). By definition, an acute REL is an exposure that is not likely to cause adverse health effects in a human population, including sensitive subgroups, exposed to that concentration (in units of micrograms per cubic meter or  $\mu\text{g}/\text{m}^3$ ) for the specified exposure duration on an intermittent basis.

The target organ systems and the acute RELs for each substance are presented in Table 6.1. Many acute RELs are based on mild adverse effects, such as mild irritation of the eyes, nose, or throat, or may result in other mild adverse physiological changes. For most individuals, it is expected that the mild irritation and other adverse physiological changes will not persist after exposure ceases. For RELs that have been recently developed or revised, the notation "sensory irritation" has been added in parenthesis in Table 6.1 for those chemicals that have an acute REL based on sensory irritation of the respiratory system (i.e., nose, throat) and/or eyes.

Other acute RELs are based on reproductive/developmental endpoints, such as teratogenicity or fetotoxicity, which are considered severe adverse effects. The inhalation pathway is the only pathway to assess for acute exposure. Other non-inhalation pathways of exposure are evaluated for worker and residential scenarios where the exposures are chronic or repeated daily in nature. The oral RELs are used to evaluate the non-inhalation pathways of exposure. Noninhalation (oral) RELs are discussed in Section 6.5. Chapter 8 discusses the methods used for determining noncancer acute health impacts. Appendix I presents an example calculation used to determine an HQ and HI.

**Table 6.1 Acute Inhalation Reference Exposure Levels (RELs) and Acute Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Acute Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Acute Hazard Index Target Organ Systems(s)
Acetaldehyde	75-07-0	$4.7 \times 10^{+2}$	Eyes; Respiratory System (sensory irritation)
Acrolein	107-02-8	$2.5 \times 10^{+0}$	Eyes; Respiratory System (sensory irritation)
Acrylic Acid	79-10-7	$6.0 \times 10^{+3}$	Eyes; Respiratory System
Ammonia	7664-41-7	$3.2 \times 10^{+3}$	Eyes; Respiratory System
Arsenic and Inorganic Arsenic Compounds (including arsine)	7440-38-2	$2.0 \times 10^{-1}$	Development; Cardiovascular System; Nervous System
Benzene	71-43-2	$2.7 \times 10^{+1}$	Reproductive/Developmental; Immune System; Hematologic System
Benzyl Chloride	100-44-7	$2.4 \times 10^{+2}$	Eyes; Respiratory System
1,3-Butadiene	106-99-0	$6.6 \times 10^{+2}$	Development
Caprolactam	105-60-2	$5.0 \times 10^{+1}$	Eyes (sensory irritation)
Carbon Disulfide	75-15-0	$6.2 \times 10^{+3}$	Nervous System; Reproductive/Developmental
Carbon Monoxide <sup>a</sup>	630-08-0	$2.3 \times 10^{+4}$	Cardiovascular System
Carbon Tetrachloride	56-23-5	$1.9 \times 10^{+3}$	Alimentary System (Liver); Nervous System Reproductive/Developmental
Chlorine	7782-50-5	$2.1 \times 10^{+2}$	Eyes; Respiratory System
Chloroform	67-66-3	$1.5 \times 10^{+2}$	Nervous System; Respiratory System; Reproductive/Developmental
Chloropicrin	76-06-2	$2.9 \times 10^{+1}$	Eyes; Respiratory System
Copper and Compounds	7440-50-8	$1.0 \times 10^{+2}$	Respiratory System
1,4-Dioxane	123-91-1	$3.0 \times 10^{+3}$	Eyes; Respiratory System
Epichlorohydrin	106-89-8	$1.3 \times 10^{+3}$	Eyes; Respiratory System
Ethylene Glycol Monobutyl Ether	111-76-2	$1.4 \times 10^{+4}$	Eyes; Respiratory System
Ethylene Glycol Monoethyl Ether	110-80-5	$3.7 \times 10^{+2}$	Reproductive/Developmental
Ethylene Glycol Monoethyl Ether Acetate	111-15-9	$1.4 \times 10^{+2}$	Nervous System; Reproductive/Developmental
Ethylene Glycol Monomethyl Ether	109-86-4	$9.3 \times 10^{+1}$	Reproductive/Developmental
Formaldehyde	50-00-0	$5.5 \times 10^{+1}$	Eyes (sensory irritation)
Hydrogen Chloride	7647-01-0	$2.1 \times 10^{+3}$	Eyes; Respiratory System
Hydrogen Cyanide	74-90-8	$3.4 \times 10^{+2}$	Nervous System
Hydrogen Fluoride	7664-39-3	$2.4 \times 10^{+2}$	Eyes; Respiratory System
Hydrogen Selenide	7783-07-5	$5.0 \times 10^{+0}$	Eyes; Respiratory System
Hydrogen Sulfide <sup>a</sup>	7783-06-4	$4.2 \times 10^{+1}$	Nervous System
Isopropanol	67-63-0	$3.2 \times 10^{+3}$	Eyes; Respiratory System
Mercury and Inorganic Mercury Compounds	7439-97-6	$6.0 \times 10^{-1}$	Nervous System; Development
Methanol	67-56-1	$2.8 \times 10^{+4}$	Nervous System
Methyl Bromide	74-83-9	$3.9 \times 10^{+3}$	Nervous System; Respiratory System; Reproductive/Developmental

Substance	Chemical Abstract Service Number (CAS)	Acute Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Acute Hazard Index Target Organ Systems(s)
Methyl Chloroform	71-55-6	$6.8 \times 10^{-4}$	Nervous System
Methyl Ethyl Ketone	78-93-3	$1.3 \times 10^{-4}$	Eyes; Respiratory System
Methylene Chloride	75-09-2	$1.4 \times 10^{-4}$	Nervous System; Cardiovascular System
Nickel and Nickel Compounds	7440-02-0	$2.0 \times 10^{-1}$	Immune System
Nitric Acid	7697-37-2	$8.6 \times 10^{-1}$	Respiratory System
Nitrogen Dioxide <sup>a</sup>	10102-44-0	$4.7 \times 10^{-2}$	Respiratory System
Ozone <sup>a</sup>	10028-15-6	$1.8 \times 10^{-2}$	Eyes; Respiratory System
Perchloroethylene (Tetrachloroethylene)	127-18-4	$2.0 \times 10^{-4}$	Eyes; Nervous System; Respiratory System
Phenol	108-95-2	$5.8 \times 10^{-3}$	Eyes; Respiratory System
Phosgene	75-44-5	$4.0 \times 10^{-0}$	Respiratory System
Propylene Oxide	75-56-9	$3.1 \times 10^{-3}$	Eyes; Respiratory System; Reproductive/Developmental
Sodium Hydroxide	1310-73-2	$8.0 \times 10^{-0}$	Eyes; Skin; Respiratory System
Styrene	100-42-5	$2.1 \times 10^{-4}$	Eyes; Respiratory System; Reproductive/Developmental
Sulfates <sup>a</sup>	N/A	$1.2 \times 10^{-2}$	Respiratory System
Sulfur Dioxide <sup>a</sup>	7446-09-5	$6.6 \times 10^{-2}$	Respiratory System
Sulfuric Acid and Oleum	7664-93-9 8014-95-7	$1.2 \times 10^{-2}$	Respiratory System
Tetrachloroethylene (Perchloroethylene)	127-18-4	$2.0 \times 10^{-4}$	Eyes; Nervous System; Respiratory System
Toluene	108-88-3	$3.7 \times 10^{-4}$	Nervous System; Respiratory System; Eyes; Reproductive/Developmental
Triethylamine	121-44-8	$2.8 \times 10^{-3}$	Nervous System; Eyes
Vanadium Pentoxide	1314-62-1	$3.0 \times 10^{-1}$	Eyes; Respiratory System
Vinyl Chloride	75-01-4	$1.8 \times 10^{-5}$	Nervous System; Eyes; Respiratory System
Xylenes (m,o,p-isomers)	1330-20-7	$2.2 \times 10^{-4}$	Eyes; Respiratory System; Nervous System

<sup>a</sup> California Ambient Air Quality Standard

### 6.3 8-hour Reference Exposure Levels

OEHHA has developed 8-hour RELs for assessing potential noncancer health impacts for exposures to the general public that occur on a recurrent basis, but only during a portion of each day (OEHHA, 2008; <http://www.oehha.ca.gov/air/allrels.html>). Eight-hour RELs are compared to air concentrations that represent an average (daily) 8-hour exposure. They were designed to address off-site worker exposure at the MEIW, but may also be used at the Districts' discretion to characterize 8-hour residential noncancer exposures, particularly for non-continuous facility operations where exposure is based on air concentrations during facility operation (i.e., the zero emission hours are not included) rather than averaged over 24-hours/day, 7 days/week as assessed for chronic exposure. The 8-hour RELs can also be used to assess exposure of students and teachers while at school (OEHHA, 2008). These RELs were developed because of concerns that applying the chronic REL in some scenarios was

overly conservative. By definition, an 8-hour REL is an exposure that is not likely to cause adverse health effects in a human population, including sensitive subgroups, exposed to that concentration (in units of micrograms per cubic meter or  $\mu\text{g}/\text{m}^3$ ) for an 8-hour exposure duration on a regular (including daily) basis.

The RELs, target organ systems, and the averaging time for substances that can present a potential hazard from inhalation for 8 hours on a daily basis are presented in Table 6.2. Chapter 8 discusses the methods used for determining noncancer 8-hour health impacts. Appendix I presents an example calculation used to determine an HQ and HI.

Any substances in Table 6.2 with Development or Reproductive System as a target organ system are represented in HARP and in the Appendix L REL tables under the single endpoint "Reproductive/Development".

**Table 6.2 Eight-Hour Inhalation Reference Exposure Levels (RELs) and 8-Hour Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Chronic Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Chronic Inhalation Hazard Index Target Organ System(s)
Acetaldehyde	75-07-0	$3.0 \times 10^{-2}$	Respiratory System
Acrolein	107-02-8	$7.0 \times 10^{-1}$	Respiratory System
Arsenic & Inorganic Arsenic Compounds	7440-38-2	$1.5 \times 10^{-2}$	Cardiovascular System; Development; Nervous System; Respiratory System; Skin
Benzene	71-43-2	$3.0 \times 10^{+0}$	Hematologic System
1,3-Butadiene	106-99-0	$9.0 \times 10^{+0}$	Reproductive System
Caprolactam	105-60-2	$7.0 \times 10^{+0}$	Respiratory System
Formaldehyde	50-0-0	$9.0 \times 10^{+0}$	Respiratory System
Manganese & Manganese Compounds	7439-96-5	$1.7 \times 10^{-1}$	Nervous System
Mercury & Inorganic Mercury Compounds	7439-97-6	$6.0 \times 10^{-2}$	Nervous System; Development; Kidney
Nickel & Nickel Compounds	7440-02-0	$6.0 \times 10^{-2}$	Respiratory System; Immune System

#### 6.4 Chronic Reference Exposure Levels

OEHHA has developed chronic RELs for assessing noncancer health impacts from long-term exposure. (OEHHA, 2008; see also <http://www.oehha.ca.gov/air/allrels.html>) A chronic REL is a concentration level (expressed in units of micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) for inhalation exposure and in a dose expressed in units of milligrams per kilogram-day (mg/kg-day) for oral exposures) at or below which no adverse health effects are anticipated following long-term exposure. Long-term exposure for these purposes has been defined by U.S. EPA as at least 12% of a lifetime, or about eight years for humans. Table 6.3 lists the chronic noncancer RELs that should be used in

the assessment of chronic health effects from inhalation exposure. Appendix L provides a consolidated listing of all the acute, 8-hour and chronic RELs and target organs that are approved for use by OEHHA and ARB for the Hot Spots Program. Periodically, new or updated RELs are adopted by OEHHA. See OEHHA's web site <http://www.oehha.ca.gov/air/allrels.html> to determine if any new or updated RELs have been adopted since the last guideline update.

The organ system(s) associated with each chronic REL are also presented in Table 6.3. Any substances in Table 6.3 with Development or Reproductive System as a target organ system are represented in HARP and in the Appendix L REL tables under the single endpoint "Reproductive/Development". Chapter 8 discusses the methods used for determining potential noncancer health impacts and Appendix I presents example calculations used to determine a HQ and HI.

**Table 6.3 Chronic Inhalation Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Chronic Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Chronic Inhalation Hazard Index Target Organ System(s)
Acetaldehyde <sup>a</sup>	75-07-0	$1.4 \times 10^{+2}$	Respiratory System
Acrolein	107-02-8	$3.5 \times 10^{-1}$	Respiratory System
Acrylonitrile	107-13-1	$5.0 \times 10^{+0}$	Respiratory System
Ammonia	7664-41-7	$2.0 \times 10^{+2}$	Respiratory System
Arsenic & Inorganic Arsenic Compounds	7440-38-2	$1.5 \times 10^{-2}$	Cardiovascular System; Development; Nervous System; Respiratory System; Skin
Benzene	71-43-2	$3.0 \times 10^{+0}$	Hematologic System
Beryllium and Beryllium Compounds	7440-41-7	$7.0 \times 10^{-3}$	Immune System; Respiratory System
1,3-Butadiene	106-99-0	$2.0 \times 10^{+0}$	Reproductive System
Cadmium and Cadmium Compounds	7440-43-9	$2.0 \times 10^{-2}$	Kidney; Respiratory System
Caprolactam	105-60-2	$2.2 \times 10^{+0}$	Respiratory System
Carbon Disulfide	75-15-0	$8.0 \times 10^{+2}$	Nervous System; Reproductive System
Carbon Tetrachloride	56-23-5	$4.0 \times 10^{+1}$	Alimentary System (Liver); Development; Nervous System
Chlorine	7782-50-5	$2.0 \times 10^{-1}$	Respiratory System
Chlorine Dioxide	10049-04-4	$6.0 \times 10^{-1}$	Respiratory System
<b>Chlorinated Dibenzo-<i>p</i>-dioxins<sup>b</sup></b>			
2,3,7,8-Tetrachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	1746-01-6	$4.0 \times 10^{-5}$	Alimentary System (Liver); Development; Endocrine System; Hematologic System; Reproductive System; Respiratory System
1,2,3,7,8-Pentachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	40321-76-4	$4.0 \times 10^{-5}$	
1,2,3,4,7,8-Hexachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	39227-28-6	$4.0 \times 10^{-4}$	
1,2,3,6,7,8-Hexachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	57653-85-7	$4.0 \times 10^{-4}$	
1,2,3,7,8,9-Hexachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	19408-74-3	$4.0 \times 10^{-4}$	
1,2,3,4,6,7,8-Heptachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	35822-46-9	$4.0 \times 10^{-3}$	
1,2,3,4,6,7,8,9-Octachlorodibenzo- <i>p</i> -dioxin <sup>b</sup>	3268-87-9	$1.3 \times 10^{-1}$	

**Table 6.3 Chronic Inhalation Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Chronic Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Chronic Inhalation Hazard Index Target Organ System(s)
<b>Chlorinated Dibenzofurans<sup>b</sup></b>			
2,3,7,8-Tetrachlorodibenzofuran <sup>b</sup>	5120-73-19	$4.0 \times 10^{-4}$	Alimentary System (Liver); Development; Endocrine System; Hematologic System; Reproductive System; Respiratory System
1,2,3,7,8-Pentachlorodibenzofuran <sup>b</sup>	57117-41-6	$1.3 \times 10^{-3}$	
2,3,4,7,8-Pentachlorodibenzofuran <sup>b</sup>	57117-31-4	$1.3 \times 10^{-4}$	
1,2,3,4,7,8-Hexachlorodibenzofuran <sup>b</sup>	70648-26-9	$4.0 \times 10^{-4}$	
1,2,3,6,7,8-Hexachlorodibenzofuran <sup>b</sup>	57117-44-9	$4.0 \times 10^{-4}$	
1,2,3,7,8,9-Hexachlorodibenzofuran <sup>b</sup>	72918-21-9	$4.0 \times 10^{-4}$	
2,3,4,6,7,8-Hexachlorodibenzofuran <sup>b</sup>	60851-34-5	$4.0 \times 10^{-4}$	
1,2,3,4,6,7,8-Heptachlorodibenzofuran <sup>b</sup>	67562-39-4	$4.0 \times 10^{-3}$	
1,2,3,4,7,8,9-Heptachlorodibenzofuran <sup>b</sup>	55673-89-7	$4.0 \times 10^{-3}$	
1,2,3,4,6,7,8,9-Octachlorodibenzofuran <sup>b</sup>	39001-02-0	$1.3 \times 10^{-1}$	
Chlorobenzene	108-90-7	$1.0 \times 10^{+3}$	Alimentary System (Liver); Kidney; Reproductive System
Chloroform	67-66-3	$3.0 \times 10^{+2}$	Alimentary System (Liver); Development; Kidney
Chloropicrin	76-06-2	$4.0 \times 10^{-1}$	Respiratory System
Chromium VI & Soluble Chromium VI Compounds (except chromic trioxide)	18540-29-9	$2.0 \times 10^{-1}$	Respiratory System
Chromic Trioxide (as chromic acid mist)	1333-82-0	$2.0 \times 10^{-3}$	Respiratory System
Cresol Mixtures	1319-77-3	$6.0 \times 10^{+2}$	Nervous System
1,4-Dichlorobenzene	106-46-7	$8.0 \times 10^{+2}$	Alimentary System (Liver); Kidney; Nervous System; Respiratory System
1,1-Dichloroethylene (Vinylidene Chloride)	75-35-4	$7.0 \times 10^{+1}$	Alimentary System (Liver)
Diesel Exhaust <sup>a</sup>	N/A	$5.0 \times 10^{+0}$	Respiratory System
Diethanolamine	111-42-2	$3.0 \times 10^{+0}$	Hematologic System; Respiratory System
N,N-Dimethylformamide	68-12-2	$8.0 \times 10^{+1}$	Alimentary System (Liver); Respiratory System
1,4-Dioxane	123-91-1	$3.0 \times 10^{+3}$	Alimentary System (Liver); Cardiovascular System; Kidney
Epichlorohydrin	106-89-8	$3.0 \times 10^{+0}$	Eyes; Respiratory System
1,2-Epoxybutane	106-88-7	$2.0 \times 10^{+1}$	Cardiovascular System; Respiratory System
Ethylbenzene	100-41-4	$2.0 \times 10^{+3}$	Alimentary System (Liver); Kidney; Development; Endocrine System
Ethyl Chloride	75-00-3	$3.0 \times 10^{+4}$	Alimentary System (Liver); Development
Ethylene Dibromide	106-93-4	$8.0 \times 10^{-1}$	Reproductive System
Ethylene Dichloride	107-06-2	$4.0 \times 10^{+2}$	Alimentary System (Liver)
Ethylene Glycol	107-21-1	$4.0 \times 10^{+2}$	Development; Kidney; Respiratory System
Ethylene Glycol Monoethyl Ether	110-80-5	$7.0 \times 10^{+1}$	Hematologic System; Reproductive System
Ethylene Glycol Monoethyl Ether Acetate	111-15-9	$3.0 \times 10^{+2}$	Development

**Table 6.3 Chronic Inhalation Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Chronic Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Chronic Inhalation Hazard Index Target Organ System(s)
Ethylene Glycol Monomethyl Ether	109-86-4	$6.0 \times 10^{+1}$	Reproductive System
Ethylene Glycol Monomethyl Ether Acetate	110-49-6	$9.0 \times 10^{+1}$	Reproductive System
Ethylene Oxide	75-21-8	$3.0 \times 10^{+1}$	Nervous System
Fluorides (except hydrogen fluoride)	N/A	$1.3 \times 10^{+1}$	Bone and Teeth; Respiratory System
Formaldehyde	50-00-0	$9.0 \times 10^{+0}$	Respiratory System
Glutaraldehyde	111-30-8	$8.0 \times 10^{-2}$	Respiratory System
Hexane (n-)	110-54-3	$7.0 \times 10^{+3}$	Nervous System
Hydrazine	302-01-2	$2.0 \times 10^{-1}$	Alimentary System (Liver); Endocrine System
Hydrogen Chloride	7647-01-0	$9.0 \times 10^{+0}$	Respiratory System
Hydrogen Cyanide	74-90-8	$9.0 \times 10^{+0}$	Cardiovascular System; Endocrine System; Nervous System
Hydrogen Fluoride	7664-39-3	$1.4 \times 10^{+1}$	Bone and Teeth; Respiratory System
Hydrogen Sulfide	7783-06-4	$1.0 \times 10^{+1}$	Respiratory System
Isophorone	78-59-1	$2.0 \times 10^{+3}$	Alimentary System (Liver); Development
Isopropanol	67-63-0	$7.0 \times 10^{+3}$	Development; Kidney
Maleic Anhydride	108-31-6	$7.0 \times 10^{-1}$	Respiratory System
Manganese & Manganese Compounds	7439-96-5	$9.0 \times 10^{-2}$	Nervous System
Mercury & Inorganic Mercury Compounds	7439-97-6	$3.0 \times 10^{-2}$	Nervous System; Development; Kidney
Methanol	67-56-1	$4.0 \times 10^{+3}$	Development
Methyl Bromide	74-83-9	$5.0 \times 10^{+0}$	Development; Nervous System; Respiratory System
Methyl Chloroform	71-55-6	$1.0 \times 10^{+3}$	Nervous System
Methyl Isocyanate	624-83-9	$1.0 \times 10^{+0}$	Reproductive System; Respiratory System
Methyl tertiary-Butyl Ether	1634-04-4	$8.0 \times 10^{+3}$	Alimentary System (Liver); Eyes; Kidney
Methylene Chloride	75-09-2	$4.0 \times 10^{+2}$	Cardiovascular System; Nervous System
4,4'-Methylene Dianiline (& its dichloride)	101-77-9	$2.0 \times 10^{+1}$	Alimentary System (Liver); Eyes
Methylene Diphenyl Isocyanate	101-68-8	$7.0 \times 10^{-1}$	Respiratory System
Naphthalene	91-20-3	$9.0 \times 10^{+0}$	Respiratory System
Nickel & Nickel Compounds (except nickel oxide)	7440-02-0	$1.4 \times 10^{-2}$	Hematologic System; Respiratory System
Nickel Oxide	1313-99-1	$2.0 \times 10^{-2}$	Respiratory System
Perchloroethylene (Tetrachloroethylene) <sup>a</sup>	127-18-4	$3.5 \times 10^{+1}$	Alimentary System (Liver); Kidney
Phenol	108-95-2	$2.0 \times 10^{+2}$	Alimentary System (Liver); Cardiovascular System; Kidney; Nervous System
Phosphine	7803-51-2	$8.0 \times 10^{-1}$	Alimentary System (Liver); Hematologic System; Kidney; Nervous System; Respiratory System

**Table 6.3 Chronic Inhalation Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service Number (CAS)	Chronic Inhalation REL ( $\mu\text{g}/\text{m}^3$ )	Chronic Inhalation Hazard Index Target Organ System(s)
Phosphoric Acid	7664-38-2	$7.0 \times 10^{+0}$	Respiratory System
Phthalic Anhydride	85-44-9	$2.0 \times 10^{+1}$	Respiratory System
<b>Polychlorinated biphenyls (PCBs)<sup>b</sup></b>			
3,3',4,4'-Tetrachlorobiphenyl (77) <sup>b</sup>	35298-13-3	$4.0 \times 10^{-1}$	Alimentary System (Liver); Developmental; Endocrine System; Hematologic System; Reproductive System; Respiratory System
3,4,4',5-Tetrachlorobiphenyl (81) <sup>b</sup>	70362-50-4	$1.3 \times 10^{-1}$	
2,3,3',4,4'-Pentachlorobiphenyl (105) <sup>b</sup>	32598-14-4	$1.3 \times 10^{+0}$	
2,3,4,4',5-Pentachlorobiphenyl (114) <sup>b</sup>	74472-37-0	$1.3 \times 10^{+0}$	
2,3',4,4',5-Pentachlorobiphenyl (118) <sup>b</sup>	31508-00-6	$1.3 \times 10^{+0}$	
2',3,4,4',5-Pentachlorobiphenyl (123) <sup>b</sup>	65510-44-3	$1.3 \times 10^{+0}$	
3,3',4,4',5-Pentachlorobiphenyl (126) <sup>b</sup>	57465-28-8	$4.0 \times 10^{-4}$	
2,3,3',4,4',5-Hexachlorobiphenyl (156) <sup>b</sup>	38380-08-4	$1.3 \times 10^{+0}$	
2,3,3',4,4',5'-Hexachlorobiphenyl (157) <sup>b</sup>	69782-90-7	$1.3 \times 10^{+0}$	
2,3',4,4',5,5'-Hexachlorobiphenyl (167) <sup>b</sup>	52663-72-6	$1.3 \times 10^{+0}$	
3,3',4,4',5,5'-Hexachlorobiphenyl (169) <sup>b</sup>	32774-16-6	$1.3 \times 10^{-3}$	
2,3,3',4,4',5,5'-Heptachlorobiphenyl (189) <sup>b</sup>	39635-31-9	$1.3 \times 10^{+0}$	
Propylene	115-07-1	$3.0 \times 10^{+3}$	Respiratory System
Propylene Glycol Monomethyl Ether	107-98-2	$7.0 \times 10^{+3}$	Alimentary System (Liver)
Propylene Oxide	75-56-9	$3.0 \times 10^{+1}$	Respiratory System
Selenium and Selenium compounds (other than Hydrogen Selenide)	7782-49-2	$2.0 \times 10^{+1}$	Alimentary System (Liver); Cardiovascular System; Nervous System
Silica (crystalline, respirable)	N/A	$3.0 \times 10^{+0}$	Respiratory System
Styrene	100-42-5	$9.0 \times 10^{+2}$	Nervous System
Sulfuric Acid	7664-93-9	$1.0 \times 10^{+0}$	Respiratory System
Toluene	108-88-3	$3.0 \times 10^{+2}$	Development; Nervous System; Respiratory System
2,4-Toluene Diisocyanate	584-84-9	$7.0 \times 10^{-2}$	Respiratory System
2,6-Toluene Diisocyanate	91-08-7	$7.0 \times 10^{-2}$	Respiratory System
Trichloroethylene <sup>a</sup>	79-01-6	$6.0 \times 10^{+2}$	Eyes; Nervous System
Triethylamine	121-44-8	$2.0 \times 10^{+2}$	Eyes
Vinyl Acetate	108-05-4	$2.0 \times 10^{+2}$	Respiratory System
Xylenes (m, o, p-isomers)	1330-20-7	$7.0 \times 10^{+2}$	Nervous System; Respiratory System; Eyes

<sup>a</sup> These peer-reviewed values were developed under the Toxic Air Contaminant (TAC) Program mandated by AB1807 (California Health and Safety Code Sec. 39650 *et seq.*).

<sup>b</sup> The OEHHA has adopted the World Health Organization Toxicity Equivalency Factor (TEF) scheme for evaluating the cancer risk and noncancer hazard due to exposure to samples containing mixtures of polychlorinated dibenzo-*p*-dioxins (PCDD) (also referred to as chlorinated dioxins and dibenzofurans), polychlorinated dibenzofurans (PCDF) and polychlorinated biphenyls (PCBs). The TEF values are revised from time to time to reflect new data and increased scientific knowledge. Currently OEHHA recommends use of the 2005 revision to the WHO TEF values (WHO<sub>05</sub>-TEF). See Appendix E for more information about the scheme and for the methodology for calculating 2,3,7,8-tetrachlorodibenzo-*p*-dioxin (TCDD) equivalents for PCDD and PCDFs. For

convenience, OEHHA has calculated chronic REL values for speciated PCDDs, PCDFs and PCBs based on the WHO<sub>05</sub> TEF values and the chronic REL for 2,3,7,8-TCDD using the procedure discussed in Appendix E. The chronic REL values can be used to calculate a hazard index when the mixtures are speciated from individual congener ground level concentrations. In those cases where speciation of dioxins and furans has not been performed, then 2,3,7,8-TCDD serves as the surrogate for dioxin and furan emissions.

N/A Not Applicable

## 6.5 Chronic Oral (Noninhalation) Reference Exposure Levels

As specified throughout the guidelines, estimates of long-term exposure resulting from facility air emissions of specific compounds must be analyzed for both inhalation and noninhalation (multipathway) pathways of exposure for humans. Facilities often emit substances under high temperature and pressure in the presence of particulate matter. While some of these substances are expected to remain in the vapor phase, other substances such as metals and semi-volatile organics can be either emitted as particles, form particles after emission from the facility, or adhere to existing particles. Some substances will partition between vapor and particulate phases. Substances in the particulate phase can be removed from the atmosphere by settling and, thus, potentially present a significant hazard via noninhalation pathways.

Particulate-associated chemicals can be deposited directly onto soil, onto the leaves or fruits of crops, or onto surface waters. Exposure via the oral route is the predominant noninhalation pathway, resulting in the noninhalation RELs being referred to as 'oral RELs' in this document. The oral RELs are used for both ingestion and dermal exposures, and are applied using the chronic non-inhalation exposures in the residential scenario and the worker scenarios. The oral RELs are expressed as doses in milligrams of substance (consumed and dermally absorbed) per kilogram body weight per day (mg/kg-day).

Table 6.4 lists the chronic noncancer RELs to be used in the assessment of chronic health effects from noninhalation pathways of exposure. Any substances in Table 6.4 with Development or Reproductive System as a target organ system are represented in HARP and in the Appendix L REL tables under the single endpoint "Reproductive/Development". Appendix L provides a consolidated listing of all chronic RELs and target organs that are approved for use by OEHHA and ARB for the Hot Spots Program. Periodically, new or updated RELs are adopted by OEHHA and these guidelines will be updated to reflect those changes. See OEHHA's web page at <http://www.oehha.ca.gov/air/allrels.html> to determine if any new or updated RELs have been adopted since the last guideline update. Chapter 8 discusses the methods used for determining potential noncancer health impacts and Appendix I presents example calculations used to determine a HQ and HI.

**Table 6.4 Chronic Noninhalation ‘Oral’ Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service No. (CAS)	Chronic Oral REL (mg/kg-day)	Chronic Oral Hazard Index Target Organ System(s)
Arsenic & Inorganic Arsenic Compounds	7440-38-2	$3.5 \times 10^{-6}$	Development; Nervous System; Respiratory System; Cardiovascular System; Skin
Beryllium and Beryllium Compounds	7440-41-7	$2.0 \times 10^{-3}$	Alimentary System (Gastrointestinal Tract)
Cadmium and Cadmium Compounds	7440-43-9	$5.0 \times 10^{-4}$	Kidney
<b>Chlorinated Dibenzo-<i>p</i>-dioxins<sup>a</sup></b>			
2,3,7,8-Tetrachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	1746-01-6	$1.0 \times 10^{-8}$	Alimentary System (Liver); Developmental; Endocrine System; Hematologic System; Reproductive System; Respiratory System
1,2,3,7,8-Pentachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	40321-76-4	$1.0 \times 10^{-8}$	
1,2,3,4,7,8-Hexachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	39227-28-6	$1.0 \times 10^{-7}$	
1,2,3,6,7,8-Hexachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	57653-85-7	$1.0 \times 10^{-7}$	
1,2,3,7,8,9-Hexachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	19408-74-3	$1.0 \times 10^{-7}$	
1,2,3,4,6,7,8-Heptachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	35822-46-9	$1.0 \times 10^{-6}$	
1,2,3,4,6,7,8,9-Octachlorodibenzo- <i>p</i> -dioxin <sup>a</sup>	3268-87-9	$3.3 \times 10^{-5}$	
<b>Chlorinated Dibenzofurans<sup>a</sup></b>			
2,3,7,8-Tetrachlorodibenzofuran <sup>a</sup>	5120-73-19	$1.0 \times 10^{-7}$	Alimentary System (Liver); Developmental; Endocrine System; Hematologic System; Reproductive System; Respiratory System
1,2,3,7,8-Pentachlorodibenzofuran <sup>a</sup>	57117-41-6	$3.3 \times 10^{-7}$	
2,3,4,7,8-Pentachlorodibenzofuran <sup>a</sup>	57117-31-4	$3.3 \times 10^{-8}$	
1,2,3,4,7,8-Hexachlorodibenzofuran <sup>a</sup>	70648-26-9	$1.0 \times 10^{-7}$	
1,2,3,6,7,8-Hexachlorodibenzofuran <sup>a</sup>	57117-44-9	$1.0 \times 10^{-7}$	
1,2,3,7,8,9-Hexachlorodibenzofuran <sup>a</sup>	72918-21-9	$1.0 \times 10^{-7}$	
2,3,4,6,7,8-Hexachlorodibenzofuran <sup>a</sup>	60851-34-5	$1.0 \times 10^{-7}$	
1,2,3,4,6,7,8-Heptachlorodibenzofuran <sup>a</sup>	67562-39-4	$1.0 \times 10^{-6}$	
1,2,3,4,7,8,9-Heptachlorodibenzofuran <sup>a</sup>	55673-89-7	$1.0 \times 10^{-6}$	
1,2,3,4,6,7,8,9-Octachlorodibenzofuran <sup>a</sup>	39001-02-0	$3.3 \times 10^{-5}$	
Chromium VI & Soluble Chromium VI Compounds (including chromic trioxide)	18540-29-9	$2.0 \times 10^{-2}$	Hematologic System
Fluorides (including hydrogen fluoride)	7664-39-3	$4.0 \times 10^{-2}$	Bone and Teeth
Mercury & Mercury Inorganic Compounds	7439-97-6	$1.6 \times 10^{-4}$	Kidney; Nervous System; Development
Nickel & Nickel Compounds (including nickel oxide)	7440-02-0	$1.1 \times 10^{-2}$	Development
<b>Polychlorinated biphenyls (PCBs) (speciated)<sup>a</sup></b>			
3,3',4,4'-Tetrachlorobiphenyl (77) <sup>a</sup>	35298-13-3	$1.0 \times 10^{-4}$	Alimentary System (Liver); Developmental; Endocrine System; Hematologic System; Reproductive System; Respiratory System
3,4,4',5-Tetrachlorobiphenyl (81) <sup>a</sup>	70362-50-4	$3.3 \times 10^{-5}$	
2,3,3',4,4'-Pentachlorobiphenyl (105) <sup>a</sup>	32598-14-4	$3.3 \times 10^{-4}$	
2,3,4,4',5-Pentachlorobiphenyl (114) <sup>a</sup>	74472-37-0	$3.3 \times 10^{-4}$	
2,3,4,4',5-Pentachlorobiphenyl (118) <sup>a</sup>	31508-00-6	$3.3 \times 10^{-4}$	
2',3,4,4',5-Pentachlorobiphenyl (123) <sup>a</sup>	65510-44-3	$3.3 \times 10^{-4}$	
3,3',4,4',5-Pentachlorobiphenyl (126) <sup>a</sup>	57465-28-8	$1.0 \times 10^{-7}$	
2,3,3',4,4',5-Hexachlorobiphenyl (156) <sup>a</sup>	38380-08-4	$3.3 \times 10^{-4}$	
2,3,3',4,4',5'-Hexachlorobiphenyl (157) <sup>a</sup>	69782-90-7	$3.3 \times 10^{-4}$	
2,3',4,4',5,5'-Hexachlorobiphenyl (167) <sup>a</sup>	52663-72-6	$3.3 \times 10^{-4}$	
3,3',4,4',5,5'-Hexachlorobiphenyl (169) <sup>a</sup>	32774-16-6	$3.3 \times 10^{-7}$	
2,3,3',4,4',5,5'-Heptachlorobiphenyl (189) <sup>a</sup>	39635-31-9	$3.3 \times 10^{-4}$	

**Table 6.4 Chronic Noninhalation ‘Oral’ Reference Exposure Levels (RELs) and Chronic Hazard Index Target Organ System(s)**

Substance	Chemical Abstract Service No. (CAS)	Chronic Oral REL (mg/kg-day)	Chronic Oral Hazard Index Target Organ System(s)
Selenium and Selenium Compounds (other than hydrogen selenide)	7782-49-2	$5.0 \times 10^{-3}$	Alimentary System (Liver); Cardiovascular System; Nervous System

<sup>a</sup> The OEHHA has adopted the World Health Organization Toxicity Equivalency Factor (TEF) scheme for evaluating the cancer risk and noncancer risk due to exposure to samples containing mixtures of polychlorinated dibenzo-*p*-dioxins (PCDD) (also referred to as chlorinated dioxins and dibenzofurans), polychlorinated dibenzofurans (PCDF), and polychlorinated biphenyls (PCBs). The TEF values are revised from time to time to reflect new data and increased scientific knowledge. Currently OEHHA recommends use of the 2005 revision to the WHO TEF values (WHO<sub>05</sub>-TEF). See Appendix E for more information about the scheme and for the methodology for calculating 2,3,7,8-equivalents for PCDD and PCDFs. For convenience, OEHHA has calculated chronic ‘oral’ REL values for speciated PCDDs, PCDFs, and PCBs based on the WHO<sub>05</sub> TEF values and the chronic ‘oral’ REL for 2,3,7,8-tetrachlorodibenzo-*p*-dioxin using the procedure discussed in Appendix E. The chronic ‘oral’ REL values can be used to calculate a hazard index when the mixtures are speciated from individual congener ground level concentrations. In those cases where speciation of dioxins and furans has not been performed, then 2,3,7,8-TCDD serves as the surrogate for dioxin and furan emissions.

## 6.6 References

OEHHA, 2008. Air Toxics Hot Spots Risk Assessment Guidelines Technical Support Document for the Derivation of Noncancer Reference Exposure Levels. Available online at: <http://www.oehha.ca.gov>

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## 7 - Dose-Response Assessment for Carcinogens

### 7.1 Introduction

Dose-response assessment characterizes the quantitative relationship between the amount of exposure to a substance (the dose) and the incidence or occurrence of injury (the response). The process often involves establishing a toxicity value or criterion to use in assessing potential health risk. The toxicity criterion, or health guidance value, for carcinogens is the cancer potency slope (potency factor), which describes the potential risk of developing cancer per unit of average daily dose over a 70-year lifetime. Cancer inhalation and oral potency factors have been derived by the Office of Environmental Health Hazard Assessment (OEHHA) or by the United States Environmental Protection Agency (U.S. EPA) and approved by the State's Scientific Review Panel on Toxic Air Contaminants. They are available for many of the substances listed in Appendix A (List of Substances) as carcinogens. Table 7.1 and Appendix L list the inhalation and oral cancer potency factors that should be used in multipathway health risk assessments (HRAs) for the Hot Spots Program.

The details on the methodology of dose-response assessment for carcinogens and the approved cancer potency factors are provided in the Air Toxics Hot Spots Risk Assessment Guidelines. Part II. Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures. May, 2009. (OEHHA, 2009; see [http://www.oehha.ca.gov/air/hot\\_spots/tsd052909.html](http://www.oehha.ca.gov/air/hot_spots/tsd052909.html)).

### 7.2 Carcinogenic Potency

Cancer potency factors used for both the inhalation and oral routes in the Hot Spots program are generally the 95% upper confidence limits (UCL) on the modeled dose-response slope at the low dose range. The cancer slope factor assumes continuous lifetime exposure to a substance, and is expressed in units of inverse dose [i.e.,  $(\text{mg}/\text{kg}/\text{day})^{-1}$ ]. Another common potency expression is in units of inverse concentration [ $(\mu\text{g}/\text{m}^3)^{-1}$ ] when the slope is based on exposure concentration rather than dose; this is termed the unit risk factor. To accommodate the use of age-specific exposure variates, the Hot Spots program has translated the unit risk factors based on concentration to units of inverse dose. This allows calculation of risk for age groupings, as exposure varies with age. It also allows for application of Age Sensitivity Factors for early life exposures.

It is assumed in cancer risk assessments that risk is directly proportional to dose and that, for most carcinogens, there is no threshold for carcinogenesis. The derivation of inhalation and oral cancer potency factors takes into account information on pharmacokinetics, when available, and on the mechanism of carcinogenic action.

Table 7.1 and Appendix L list inhalation and oral cancer potency factors that should be used in risk assessments for the Hot Spots Program. Chapter 8 describes procedures for use of potency factors in estimating potential cancer risk.

### **7.2.1 Inhalation Cancer Potency Factors**

The risk assessment methodology and algorithms presented in Chapter 8 express the inhalation cancer slope factors in units of inverse dose (i.e.,  $(\text{mg}/\text{kg}/\text{day})^{-1}$ ). Breathing rates, expressed in units of liters per kilogram of body weight-day ( $\text{L}/\text{kg}\text{-day}$ ), are multiplied with the air concentrations, coupled with the appropriate unit conversion factor, to estimate dose in  $\text{mg}/\text{kg}\text{-day}$ . This allows estimation of average and high-end cancer risk point estimates. Estimation of a distribution of cancer risk based on variability in breathing rate can be obtained by Monte Carlo methods using the distributions of breathing rates in  $\text{L}/\text{kg}\text{-day}$ , which can then be converted to a dose distribution in  $\text{mg}/\text{kg}$  BW based on the intake rate. Unit risk factors [in the units of inverse concentration (i.e.,  $(\mu\text{g}/\text{m}^3)^{-1}$ ), which were used in previous guidelines for the Hot Spots program, are still listed in the TSD (OEHHA, 2009) and may prove useful in other risk assessment applications.

The average daily inhalation dose ( $\text{mg}/\text{kg}\text{-day}$ ) multiplied by the cancer potency factor ( $\text{mg}/\text{kg}\text{-day}$ )<sup>-1</sup> will give the inhalation cancer risk (unitless), which is an expression of the chemical's cancer risk during a 70-year lifespan of exposure. For example, an inhalation cancer risk of  $5 \times 10^{-6}$  is the same as stating that an individual has an estimated probability of developing cancer from their exposure of 5 chances per million people exposed. A more complete description of how potential cancer risk is calculated from the exposure dose and cancer potency factors is provided in Chapter 8. Appendix I presents an example calculation for determining cancer risk.

A list of current inhalation potency factors is provided in Table 7.1. Periodically, new or revised cancer potency factors will be peer reviewed by the State's Scientific Review Panel on Toxic Air Contaminants (SRP) and adopted by the Director of OEHHA. For new or updated numbers, consult the OEHHA web site at ([http://www.oehha.ca.gov/air/hot\\_spots/tsd052909.html](http://www.oehha.ca.gov/air/hot_spots/tsd052909.html)) to determine if any new or updated cancer potency factors have been adopted since this guideline update. New cancer potency factors that have been approved by the SRP and adopted by the Director of OEHHA should be incorporated into Hot Spots risk assessment for facilities that emit those chemicals.

### **7.2.2 Oral Cancer Potency Factors**

Under the Hot Spots Program, a few substances are evaluated for exposure and risk from non-inhalation pathways – these are referred to as multipathway substances. Multipathway substances have the potential to impact a receptor through inhalation and noninhalation (oral and dermal) exposure routes. These substances include heavy metals and semi-volatile organic substances such as dioxins, furans, and polycyclic aromatic hydrocarbons (PAHs). These substances commonly exist in the particle

phase or partially in the particle phase when emitted into the air. They can therefore be deposited onto soil, vegetation, and water. Noninhalation exposure pathways considered under the Hot Spots Program include the ingestion of soil, homegrown produce, meat, milk, surface water, breast milk, and fish as well as dermal exposure to contaminants deposited in the soil. See Table 5.1 for a list of the multipathway substances.

Table 7.1 and Appendix L list oral cancer potency factors in units of  $(\text{mg}/\text{kg}\text{-day})^{-1}$  that should be used for assessing the potential cancer risk for these substances through noninhalation exposure pathways. The cancer risk from these individual pathways is calculated by multiplying the dose  $(\text{mg}/\text{kg}\text{-day})$  times the oral cancer potency factor  $(\text{mg}/\text{kg}\text{-day})^{-1}$  to yield the potential cancer risk (unitless) from non-inhalation exposures. Chapter 5 provides all of the algorithms to calculate exposure dose through all of the individual exposure pathways. Appendix I provides a sample calculation for dose and cancer risk using the inhalation exposure pathway.

Three carcinogens (cadmium, beryllium, and nickel), although subject to deposition, are only treated as carcinogenic by the inhalation route and not by the oral route. Therefore, there are no oral cancer potency factors for these substances. However, the oral doses of these substances need to be estimated because of their noncancer toxicity. See Chapters 6 and 8, and Appendices I and L for dose-response factors, and calculations to address these substances.

Table 7.1 Inhalation and Oral Cancer Potency Factors

Substance	Chemical Abstract Service Number (CAS)	Inhalation Potency Factor (mg/kg-day) <sup>-1</sup>	Oral Slope Factor (mg/kg-day) <sup>-1</sup>
Acetaldehyde	75-07-0	1.0 x 10 <sup>-2</sup>	
Acetamide	60-35-5	7.0 x 10 <sup>-2</sup>	
Acrylamide	79-06-1	4.5 x 10 <sup>+0</sup>	
Acrylonitrile	107-13-1	1.0 x 10 <sup>+0</sup>	
Allyl chloride	107-05-1	2.1 x 10 <sup>-2</sup>	
2-Aminoanthraquinone	117-79-3	3.3 x 10 <sup>-2</sup>	
Aniline	62-53-3	5.7 x 10 <sup>-3</sup>	
Arsenic (inorganic)	7440-38-2	1.2 x 10 <sup>+1</sup>	1.5 x 10 <sup>+0</sup>
Asbestos #	1332-21-4	2.2 x 10 <sup>+2#</sup>	
Benz[a]anthracene <sup>BaP</sup>	56-55-3	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Benzene	71-43-2	1.0 x 10 <sup>-1</sup>	
Benzydine	92-87-5	5.0 x 10 <sup>+2</sup>	
Benzo[a]pyrene	50-32-8	3.9 x 10 <sup>+0</sup>	1.2 x 10 <sup>+1</sup>
Benzo[b]fluoranthrene <sup>BaP</sup>	205-99-2	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Benzo[j]fluoranthrene <sup>BaP</sup>	205-82-3	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Benzo[k]fluoranthrene <sup>BaP</sup>	207-08-9	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Benzyl chloride	100-44-7	1.7 x 10 <sup>-1</sup>	
Beryllium	7440-41-7	8.4 x 10 <sup>+0</sup>	
Bis(2-chloroethyl) ether	111-44-4	2.5 x 10 <sup>+0</sup>	
Bis(chloromethyl)ether	542-88-1	4.6 x 10 <sup>+1</sup>	
1,3-Butadiene	106-99-0	6.0 x 10 <sup>-1</sup>	
Cadmium (and compounds)	7440-43-9	1.5 x 10 <sup>+1</sup>	
Carbon tetrachloride	56-23-5	1.5 x 10 <sup>-1</sup>	
<b>Chlorinated Dibenzo-p-dioxins <sup>A</sup></b>			
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746-01-6	1.3 x 10 <sup>+5</sup>	1.3 x 10 <sup>+5</sup>
1,2,3,7,8-Pentachlorodibenzo-p-dioxin	40321-76-4	1.3 x 10 <sup>+5</sup>	1.3 x 10 <sup>+5</sup>
1,2,3,4,7,8-Hexachlorodibenzo-p-dioxin	39227-28-6	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,6,7,8-Hexachlorodibenzo-p-dioxin	57653-85-7	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,7,8,9-Hexachlorodibenzo-p-dioxin	19408-74-3	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	35822-46-9	1.3 x 10 <sup>+3</sup>	1.3 x 10 <sup>+3</sup>
1,2,3,4,,6,7,8,9-Octachlorodibenzo-p-dioxin	3268-87-9	3.9 x 10 <sup>+1</sup>	3.9 x 10 <sup>+1</sup>
<b>Chlorinated Dibenzofurans <sup>A</sup></b>			
2,3,7,8-Tetrachlorodibenzofuran	5120-73-19	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,7,8-Pentachlorodibenzofuran	57117-41-6	3.9 x 10 <sup>+3</sup>	3.9 x 10 <sup>+3</sup>
2,3,4,7,8-Pentachlorodibenzofuran	57117-31-4	3.9 x 10 <sup>+4</sup>	3.9 x 10 <sup>+4</sup>
1,2,3,4,7,8-Hexachlorodibenzofuran	70648-26-9	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,6,7,8-Hexachlorodibenzofuran	57117-44-9	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
1,2,3,7,8,9-Hexachlorodibenzofuran	72918-21-9	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
2,3,4,6,7,8-Hexachlorodibenzofuran	60851-34-5	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>

Table 7.1 Inhalation and Oral Cancer Potency Factors

Substance	Chemical Abstract Service Number (CAS)	Inhalation Potency Factor (mg/kg-day) <sup>-1</sup>	Oral Slope Factor (mg/kg-day) <sup>-1</sup>
1,2,3,4,6,7,8-Heptachlorodibenzofuran	67562-39-4	1.3 x 10 <sup>+3</sup>	1.3 x 10 <sup>+3</sup>
1,2,3,4,7,8,9-Heptachlorodibenzofuran	55673-89-7	1.3 x 10 <sup>+3</sup>	1.3 x 10 <sup>+3</sup>
1,2,3,4,,6,7,8,9-Octachlorodibenzofuran	39001-02-0	3.9 x 10 <sup>+1</sup>	3.9 x 10 <sup>+1</sup>
Chlorinated paraffins	108171-26-2	8.9 x 10 <sup>-2</sup>	
Chloroform	67-66-3	1.9 x 10 <sup>-2</sup>	
4-Chloro- <i>o</i> -phenylenediamine	95-83-0	1.6 x 10 <sup>-2</sup>	
<i>p</i> -Chloro- <i>o</i> -toluidine	95-69-2	2.7 x 10 <sup>-1</sup>	
Chromium (hexavalent)	18540-29-9	5.1 x 10 <sup>+2</sup>	5 x 10 <sup>-1</sup>
Chrysene <sup>BaP</sup>	218-01-9	3.9 x 10 <sup>-2</sup>	1.2 x 10 <sup>-1</sup>
Creosote	8001-58-9	*	
<i>p</i> -Cresidine	120-71-8	1.5 x 10 <sup>-1</sup>	
Cupferron	135-20-6	2.2 x 10 <sup>-1</sup>	
2,4-Diaminoanisole	615-05-4	2.3 x 10 <sup>-2</sup>	
2,4-Diaminotoluene	95-80-7	4.0 x 10 <sup>+0</sup>	
Dibenz[ <i>a,h</i> ]acridine <sup>BaP</sup>	226-36-8	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Dibenz[ <i>a,l</i> ]acridine <sup>BaP</sup>	224-42-0	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Dibenz[ <i>a,h</i> ]anthracene <sup>BaP</sup>	53-70-3	4.1 x 10 <sup>+0</sup>	4.1 x 10 <sup>+0</sup>
Dibenzo[ <i>a,e</i> ]pyrene <sup>BaP</sup>	192-65-4	3.9 x 10 <sup>+0</sup>	1.2 x 10 <sup>+1</sup>
Dibenzo[ <i>a,h</i> ]pyrene <sup>BaP</sup>	189-64-0	3.9 x 10 <sup>+1</sup>	1.2 x 10 <sup>+2</sup>
Dibenzo[ <i>a,l</i> ]pyrene <sup>BaP</sup>	189-55-9	3.9 x 10 <sup>+1</sup>	1.2 x 10 <sup>+2</sup>
Dibenzo[ <i>a,l</i> ]pyrene <sup>BaP</sup>	191-30-0	3.9 x 10 <sup>+1</sup>	1.2 x 10 <sup>+2</sup>
7H-Dibenzo[ <i>c,g</i> ]carbazole <sup>BaP</sup>	194-59-2	3.9 x 10 <sup>+0</sup>	1.2 x 10 <sup>+1</sup>
1,2-Dibromo-3-chloropropane	96-12-8	7.0 x 10 <sup>+0</sup>	
1,4-Dichlorobenzene	106-46-7	4.0 x 10 <sup>-2</sup>	
3,3'-Dichlorobenzidine	91-94-1	1.2 x 10 <sup>+0</sup>	
1,1-Dichloroethane	75-34-3	5.7 x 10 <sup>-3</sup>	
Diesel exhaust <sup>B</sup>	NA	1.1 x 10 <sup>+0</sup>	
Diethylhexylphthalate	117-81-7	8.4 x 10 <sup>-3</sup>	8.4 x 10 <sup>-3</sup>
<i>p</i> -Dimethylaminoazobenzene	60-11-7	4.6 x 10 <sup>+0</sup>	
7,12-Dimethylbenz[ <i>a</i> ]anthracene <sup>BaP</sup>	57-97-6	2.5 x 10 <sup>+2</sup>	2.5 x 10 <sup>+2</sup>
1,6-Dinitropyrene <sup>BaP</sup>	42397-64-8	3.9 x 10 <sup>+1</sup>	1.2 x 10 <sup>+2</sup>
1,8-Dinitropyrene <sup>BaP</sup>	42397-65-9	3.9 x 10 <sup>+0</sup>	1.2 x 10 <sup>+1</sup>
2,4-Dinitrotoluene	121-14-2	3.1 x 10 <sup>-1</sup>	
1,4-Dioxane	123-91-1	2.7 x 10 <sup>-2</sup>	
Epichlorohydrin	106-89-8	8.0 x 10 <sup>-2</sup>	
Ethyl benzene	100-41-4	8.7 x 10 <sup>-3</sup>	1.1 x 10 <sup>-2</sup>
Ethylene dibromide	106-93-4	2.5 x 10 <sup>-1</sup>	
Ethylene dichloride	107-06-2	7.2 x 10 <sup>-2</sup>	
Ethylene oxide	75-21-8	3.1 x 10 <sup>-1</sup>	

Table 7.1 Inhalation and Oral Cancer Potency Factors

Substance	Chemical Abstract Service Number (CAS)	Inhalation Potency Factor (mg/kg-day) <sup>-1</sup>	Oral Slope Factor (mg/kg-day) <sup>-1</sup>
Ethylene thiourea	96-45-7	4.5 x 10 <sup>-2</sup>	
Formaldehyde	50-00-0	2.1 x 10 <sup>-2</sup>	
Hexachlorobenzene	118-74-1	1.8 x 10 <sup>+0</sup>	
Hexachlorocyclohexanes (technical grade)	608-73-1	4.0 x 10 <sup>+0</sup>	4.0 x 10 <sup>+0</sup>
Hydrazine	302-01-2	1.7 x 10 <sup>+1</sup>	3.0 x 10 <sup>+0</sup>
Indeno[1,2,3- <i>cd</i> ]pyrene <sup>BaP</sup>	193-39-5	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
Lead and lead compounds	7439-92-1	4.2 x 10 <sup>-2</sup>	8.5 x 10 <sup>-3</sup>
Lindane	58-89-9	1.1 x 10 <sup>+0</sup>	1.1 x 10 <sup>+0</sup>
Methyl tertiary-butyl ether	1634-04-4	1.8 x 10 <sup>-3</sup>	
3-Methylcholanthrene <sup>BaP</sup>	56-49-5	2.2 x 10 <sup>+1</sup>	2.2 x 10 <sup>+1</sup>
5-Methylchrysene <sup>BaP</sup>	3697-24-3	3.9 x 10 <sup>+0</sup>	1.2 x 10 <sup>+1</sup>
4, 4'-Methylene bis(2-chloroaniline) (MOCA)	101-14-4	1.5 x 10 <sup>+0</sup>	
Methylene chloride	75-09-2	3.5 x 10 <sup>-3</sup>	
4,4'-Methylenedianiline	101-77-9	1.6 x 10 <sup>+0</sup>	1.6 x 10 <sup>+0</sup>
Michler's ketone	90-94-8	8.6 x 10 <sup>-1</sup>	
Naphthalene	91-20-3	1.2 x 10 <sup>-1</sup>	
Nickel (and compounds)	7440-02-0	9.1 x 10 <sup>-1</sup>	
5-Nitroacenaphthene <sup>BaP</sup>	602-87-9	1.3 x 10 <sup>-1</sup>	1.3 x 10 <sup>-1</sup>
6-Nitrochrysene <sup>BaP</sup>	7496-02-8	3.9 x 10 <sup>+1</sup>	1.2 x 10 <sup>+2</sup>
2-Nitrofluorene <sup>BaP</sup>	607-57-8	3.9 x 10 <sup>-2</sup>	1.2 x 10 <sup>-1</sup>
1-Nitropyrene <sup>BaP</sup>	5522-43-0	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
4-Nitropyrene <sup>BaP</sup>	57835-92-4	3.9 x 10 <sup>-1</sup>	1.2 x 10 <sup>+0</sup>
N-Nitroso- <i>n</i> -butylamine	924-16-3	1.1 x 10 <sup>+1</sup>	
N-Nitroso- <i>N</i> -methylethylamine	10595-95-6	2.2 x 10 <sup>+1</sup>	
N-Nitrosodi- <i>n</i> -propylamine	621-64-7	7.0 x 10 <sup>+0</sup>	
N-Nitrosodiethylamine	55-18-5	3.6 x 10 <sup>+1</sup>	
N-Nitrosodimethylamine	62-75-9	1.6 x 10 <sup>+1</sup>	
N-Nitrosodiphenylamine	86-30-6	9.0 x 10 <sup>-3</sup>	
<i>p</i> -Nitrosodiphenylamine	156-10-5	2.2 x 10 <sup>-2</sup>	
N-Nitrosomorpholine	59-89-2	6.7 x 10 <sup>+0</sup>	
N-Nitrosopiperidine	100-75-4	9.4 x 10 <sup>+0</sup>	
N-Nitrosopyrrolidine	930-55-2	2.1 x 10 <sup>+0</sup>	
Pentachlorophenol	87-86-5	1.8 x 10 <sup>-2</sup>	
Perchloroethylene	127-18-4	2.1 x 10 <sup>-2</sup>	5.1 x 10 <sup>-2</sup>
<b>Polychlorinated biphenyls (PCBs) (unspeciated mixture)</b>	1336-36-3		
(high risk) <sup>P1</sup>		2.0 x 10 <sup>+0</sup>	2.0 x 10 <sup>+0</sup>
(low risk) <sup>P2</sup>		4.0 x 10 <sup>-1</sup>	4.0 x 10 <sup>-1</sup>
(lowest risk) <sup>P3</sup>		7.0 x 10 <sup>-2</sup>	7.0 x 10 <sup>-2</sup>

Table 7.1 Inhalation and Oral Cancer Potency Factors

Substance	Chemical Abstract Service Number (CAS)	Inhalation Potency Factor (mg/kg-day) <sup>-1</sup>	Oral Slope Factor (mg/kg-day) <sup>-1</sup>
<b>Polychlorinated biphenyls<sup>P4</sup> (PCBs) (speciated)</b>			
3,3',4,4'-Tetrachlorobiphenyl (77)	35298-13-3	1.3 x 10 <sup>+1</sup>	1.3 x 10 <sup>+1</sup>
3,4,4',5-Tetrachlorobiphenyl (81)	70362-50-4	3.9 x 10 <sup>+1</sup>	3.9 x 10 <sup>+1</sup>
2,3,3',4,4'- Pentachlorobiphenyl (105)	32598-14-4	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
2,3,4,4',5- Pentachlorobiphenyl (114)	74472-37-0	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
2,3',4,4',5- Pentachlorobiphenyl (118)	31508-00-6	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
2',3,4,4',5- Pentachlorobiphenyl (123)	65510-44-3	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
3,3',4,4',5- Pentachlorobiphenyl (126)	57465-28-8	1.3 x 10 <sup>+4</sup>	1.3 x 10 <sup>+4</sup>
2,3,3',4,4',5-Hexachlorobiphenyl (156)	38380-08-4	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
2,3,3',4,4',5'-Hexachlorobiphenyl (157)	69782-90-7	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
2,3',4,4',5,5'-Hexachlorobiphenyl (167)	52663-72-6	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
3,3',4,4',5,5'- Hexachlorobiphenyl (169)	32774-16-6	3.9 x 10 <sup>+3</sup>	3.9 x 10 <sup>+3</sup>
2,3,3',4,4',5,5'- Heptachlorobiphenyl (189)	39635-31-9	3.9 x 10 <sup>+0</sup>	3.9 x 10 <sup>+0</sup>
Potassium bromate	7758-01-2	4.9 x 10 <sup>-1</sup>	
1,3-Propane sultone	1120-71-4	2.4 x 10 <sup>+0</sup>	
Propylene oxide	75-56-9	1.3 x 10 <sup>-2</sup>	2.4 x 10 <sup>-1</sup>
1,1,2,2-Tetrachloroethane	79-34-5	2.0 x 10 <sup>-1</sup>	
Thioacetamide	62-55-5	6.1 x 10 <sup>+0</sup>	
2,4-Toluene diisocyanate	584-84-9	3.9 x 10 <sup>-2</sup>	
2,6-Toluene diisocyanate	91-08-7	3.9 x 10 <sup>-2</sup>	
1,1,2-Trichloroethane (vinyl trichloride)	79-00-5	5.7 x 10 <sup>-2</sup>	
Trichloroethylene	79-01-6	7.0 x 10 <sup>-3</sup>	1.5 x 10 <sup>-2</sup>
2,4,6-Trichlorophenol	88-06-2	7.0 x 10 <sup>-2</sup>	
Urethane	51-79-6	1.0 x 10 <sup>+0</sup>	
Vinyl chloride	75-01-4	2.7 x 10 <sup>-1</sup>	

**Notes for Table 7.1**

- # Asbestos:  $[100 \text{ PCM fibers/m}^3]^{-1}$  A unit risk factor of  $2.7 \times 10^{-6} (\mu\text{g/m}^3)^{-1}$  and an inhalation cancer potency factor of  $2.2 \times 10^{+2} (\text{mg/kg BW*day})^{-1}$  are available (see Appendix C for explanation).
- BaP PAHs and PAH Derivatives: Many have potency equivalency factors relative to benzo[a]pyrene (see Appendix G). For multipathway chemicals, including PAHs, the oral slope factor is considered the same as the inhalation potency factor unless otherwise noted in the Table.
- A Polychlorinated Dibenzo-*p*-dioxins, Polychlorinated Dibenzofurans and speciated polychlorinated biphenyls: (see Appendix E). For convenience, OEHHA has calculated cancer potency factors for speciated polychlorinated dibenzo-*p*-dioxin, polychlorinated dibenzofuran and polychlorinated biphenyl congeners using the procedure in Appendix E.
- B Diesel Exhaust is listed as a Toxic Air Contaminant by the Air Resources Board as "Particulate Matter from Diesel-Fueled Engines". (See Appendix D)
- \* Creosote: Can be calculated using Potency Equivalency Factors contained in the benzo[a]pyrene Toxic Air Contaminant document and in Appendix G of these guidelines.
- P1 Polychlorinated Biphenyls (PCBs): High Risk is for use in cases where congeners with more than four chlorines do not comprise less (are greater) than one-half percent of total PCBs. The high risk number is the default for unspciated PCB mixtures.
- P2 The low risk number is generally not applicable to the Hot Spots program. The Hot Spots program addresses PCBs emitted by stationary facilities. It cannot be assumed that such emissions would occur by simple evaporation. There is a dermal absorption factor applied in evaluation of the dermal pathway for PCBs so the medium risk would not apply to dermal exposure (OEHHA, 2009). The water pathway does not include an assumption that PCB isomers are water soluble, so the medium number would not apply to the water pathway.
- P3 Polychlorinated Biphenyls (PCBs): Lowest Risk is for use in cases where congeners with more than four chlorines comprise less than one-half percent of total PCBs. In order for the low number to be used, scientific justification needs to be presented.
- P4 Number in parentheses is the IUPAC #, the PCB nomenclature is IUPAC. For multipathway chemicals, including PCBs, the oral slope factor is considered the same as the inhalation potency factor unless otherwise noted in the Table.

**7.3 References**

OEHHA, 2009. Air Toxics Hot Spots Risk Assessment Guidelines. Part II. Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures. May, 2009. Available online at: [http://www.oehha.ca.gov/air/hot\\_spots/tsd052909.html](http://www.oehha.ca.gov/air/hot_spots/tsd052909.html)

## 8 - Risk Characterization for Carcinogens and Noncarcinogens and the Requirements for Hot Spots Risk Assessments

### 8.1 Introduction

Risk characterization is the final step of the health risk assessment (HRA). In this step, information developed through the exposure assessment is combined with information from the dose-response assessment to characterize risks to the general public from emissions. In the Hot Spots program, OEHHA conducts the dose-response assessment during the development of cancer potency factors and Reference Exposure Levels. These are used in conjunction with the exposure estimates to estimate cancer risk and evaluate hazard from noncancer toxicity of emitted chemicals. Under the Air Toxics Hot Spots (Hot Spots) Act, risk characterizations should present both individual and population-wide health risks (Health and Safety Code Section (HSC) 44306). Persons preparing HRAs for the Hot Spots Program should consult the local Air Pollution Control or Air Quality Management District (District) to determine if the District has special guidelines to assist with HRA format or other requirements of the Hot Spots Program.

OEHHA is recommending that a 30-year exposure duration be used as the basis for estimating cancer risk at the maximum exposed individual resident (MEIR) in the Hot Spots Program. This exposure duration represents the time of residency for 90 to 95% of Californians at a single location and should provide adequate public health protection against individual risk. We also recommend including the 9 and 70-year cancer risk at the MEIR as supplemental information. Note that a 70-year exposure duration is required to estimate cancer burden or provide an estimate of population-wide risk.

This chapter provides guidance on how to evaluate the risk characterization component of risk assessments required by the Hot Spots Program. A general summary of the risk characterization components includes the following items and information.

- The locations of the point of maximum impact (PMI), the MEIR, and the maximum exposed individual worker (MEIW) are to be identified. The PMI, MEIW, and MEIR for cancer risk and for noncancer hazard indices (averaging times for acute 1-hour, repeated 8-hour, and chronic hazard indices) may not be the same location; all should be identified.

- The location of any specified sensitive receptors (e.g., schools, hospitals, daycare, or eldercare facilities - contact the District or reviewing authority for more information) should be identified
- Estimates of population-wide cancer risk and noncancer hazard

This information must be clearly presented in cross-referenced text, tables, figures, and maps. Chapter 9 provides an outline that specifies the content and recommended format of HRA results. The HARP software is the recommended model for calculating HRA results for the Hot Spots Program. Information on obtaining the HARP software can be found under the Air Toxics Program on the ARB's web site at [www.arb.ca.gov](http://www.arb.ca.gov).

### 8.1.1 Tiered Approach to Risk Assessment

The tiered approach for risk assessment that is presented in detail in the TSD (OEHHA, 2012) and summarized here should be reviewed prior to conducting the health risk assessment. The tiered approach to risk assessment and the health impacts evaluation described here are included in the HARP software.

The tiered approach provides a risk assessor with flexibility and allows consideration of site-specific differences (Table 8.1). The four-tiered approach to risk assessment is intended to primarily apply to residential cancer risk assessment, both for inhalation and noninhalation pathways. Risk assessors can tailor the level of effort and refinement of an HRA by using either the point estimate exposure assumptions as the basis of the exposure and risk assessment, or both the point estimate and a stochastic treatment of exposure factor distributions.

**Table 8.1 The Tiered Approach to Risk Assessment**

<b>Tier</b>	<b>Description</b>	<b>When Applied</b>
Tier 1	Utilizes OEHHA default point estimates of exposure variates	All risk assessments must include a Tier 1 assessment
Tier 2	Utilizes site-specific point estimates for exposure variates (justified, and approved by OEHHA)	A Tier 2 approach may be presented in addition to Tier 1
Tier 3	Utilizes OEHHA distributions of exposure variates	A Tier 3 approach may be presented in addition to Tier 1
Tier 4	Utilizes site-specific distributions of exposure variates (justified, and approved by OEHHA)	A Tier 4 approach may be presented in addition to Tier 1

Tier 1 is a standard point estimate approach that uses the recommended exposure variate (e.g., breathing or water ingestion rate) point estimates presented in this document. Derivations of these values are described in detail in OEHHA (2012). The results of the Tier 1 evaluations are required to be presented in the risk characterization section for all HRAs prepared for the Hot Spots Program. Thus, persons preparing an HRA using Tier 2 through Tier 4 evaluations must also include the risk characterization results of a Tier 1 evaluation in the HRA.

As discussed in OEHHA (2012), if the risk characterization results from a Tier 1 assessment are above a regulatory level of concern, the risk assessor may want to proceed with more site-specific analysis as described in Tier 2, or use a more resource-intensive stochastic modeling effort described in Tier 3 and Tier 4 (for cancer risk). While further evaluation may provide more information to the risk manager on which to base decisions, the Tier 1 evaluation is useful in comparing risks among a large number of facilities and must be included in all HRAs.

Tier 2 analysis allows the use of available and justifiable site-specific exposure variates (e.g., fish consumption), when presenting the potential health impacts. The site-specific information applied in a Tier 2 assessment must be adequately justified and approved by OEHHA and the District. In Tier 3, a stochastic approach to exposure assessment is taken using the distributions for the exposure pathways presented in the TSD (OEHHA, 2012) and in Chapter 5 of this Guidance Manual. The exposure distributions apply only to a residential receptor and are used only for the determination of cancer risk. OEHHA has not developed exposure intake distributions for workers to use in the offsite worker exposure scenario. Tier 4 is also a stochastic approach for the residential exposure scenario but allows for utilization of site-specific exposure variate distributions if they are justifiable and more appropriate for the site under evaluation than those derived in OEHHA (2012). Alternative site-specific distributions must be approved by OEHHA and the District. For an off-site worker cancer risk evaluation, Tiers 3 and 4 do not apply. Tier 3 and Tier 4 analyses show what a distribution of potential cancer risk may be to an individual or population based on a distribution of exposure inputs (e.g., water ingestion rate) rather than specific point estimates of exposure.

Table 8.2 summarizes OEHHA's recommendations for use of the four Tiers in cancer and noncancer risk assessment.

**Table 8.2 Tiers for Residential and Offsite Worker Cancer and Noncancer Hot Spots Risk Assessments**

Tier	Cancer		Non Cancer Chronic and 8-Hour	
	Inhalation	Noninhalation	Inhalation	Noninhalation
Tier-1	X	X	X	X
Tier-2	X	X		X <sup>b</sup>
Tier-3	X <sup>a</sup>	X <sup>a</sup>		
Tier-4	X <sup>a</sup>	X <sup>a</sup>		

<sup>a</sup> Applies to residential exposure scenario only

<sup>b</sup> Applies to chronic noncancer exposure only

OEHHA has not developed a stochastic approach (Tier 3 or 4) for estimating noncancer health impacts using acute, 8-hour, and chronic Reference Exposure Levels (RELs). Tier 1 is the only option for determining noncancer health impacts from inhalation exposure since calculating the hazard quotient involves dividing the ground level air concentrations for the specified exposure duration by the appropriate RELs. However, chronic noninhalation noncancer risks involve a calculation of dose from oral or dermal pathways to which site-specific evaluations could be considered under a Tier 2 approach.

#### Small foot-print facilities – Tier 2 or Tier 4

Some facilities subject to the Air Toxics Hot Spots Act (e.g., some in the industry-wide categories such as gas stations or dry cleaners) have very small zones of impact. In some of these instances, there will be very few receptors within the zone of impact. It isn't possible to develop special recommendations for exposure variates for all possible exposure scenarios. Alternative breathing rates (point estimates or distributions) may be used as part of Tier 2 or Tier 4 risk assessments with appropriate supporting justification in the case of a very small zone of impact. OEHHA is willing to work with risk managers at ARB and the Districts on this issue.

## **8.2 Risk Characterization for Carcinogens**

Cancer risk is calculated by multiplying the daily inhalation or oral dose (calculated in Chapter 5), by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home (for residents only), and the exposure duration divided by averaging time, to yield the excess cancer risk (see section 8.2.4). As described below, the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location. A brief description of the age sensitivity factors, exposure duration, and frequency of time spent at home are included in Sections 8.2.1 to 8.2.3 below. These factors are discussed in detail in OEHHA (2009) and OEHHA (2012).

### **8.2.1 *Adjustment for Early Life Stage Exposures to Carcinogens***

Studies have shown that young animals are more sensitive than adult animals to exposure to many carcinogens (OEHHA, 2009). Therefore, OEHHA developed age sensitivity factors (ASFs) to take into account the increased sensitivity to carcinogens during early-in-life exposure (Table 8.3). These factors were developed and described in detail in OEHHA (2009). In the absence of chemical-specific data, OEHHA recommends a default ASF of 10 for the third trimester to age 2 years, and an ASF of 3 for ages 2 through 15 years to account for potential increased sensitivity to carcinogens during childhood.

**Table 8.3 Age Sensitivity Factors by Age Group for Cancer Risk Assessment**

Age Group	Age Sensitivity Factor (unitless)
3 <sup>rd</sup> Trimester	10
0<2 years	10
2<9 years	3
2<16 years	3
16<30 years	1
16-70 years	1

For specific carcinogens where data indicate enhanced sensitivity during life stages other than the immediate postnatal and juvenile periods, or for which data demonstrate ASFs different from the default ASFs, the chemical-specific data should be used in order to adequately protect public health.

The risk assessments generated under the Air Toxics Hot Spots Act are reviewed by OEHHA. If a risk assessor had data indicating there are no windows of susceptibility early in life or that a different ASF should be used for a specific carcinogen and wanted to use these data, OEHHA would review the material as part of the review of the risk assessment.

### 8.2.2 Fraction of Time Spent at Home for Cancer Risk Assessment

OEHHA and ARB evaluated information from activity patterns databases to estimate the fraction of time at home (FAH) during the day (OEHHA, 2012). This information can be used to adjust exposure duration and cancer risk from a specific facility's emissions, based on the assumption that exposure to the facility's emissions are not occurring away from home. From the third trimester to age <2 years, 85% of time is spent at home (Table 8.4). From age 2 through <16 years, 72% of time is spent at home. From age 16 years and greater, 73% of time is spent at home. Facilities with any school within the  $1 \times 10^{-6}$  (or greater) isopleth should use FAH = 1 for the child age groups (3<sup>rd</sup> Trimester, 0<2 years, and 2<16 years). See Appendix I for an example calculation using the FAH.

**Table 8.4 Recommendations for Fraction of Time at Home (FAH) for Evaluating Residential Cancer Risk**

Age Range	Fraction of Time at Residence
3 <sup>rd</sup> Trimester, and 0<2 years	0.85 <sup>1</sup>
2<16 years <sup>2</sup>	0.72 <sup>1</sup>
16-70 years <sup>3</sup>	0.73

<sup>1</sup> Use FAH = 1 if a school is within the  $1 \times 10^{-6}$  (or greater) cancer risk isopleth

<sup>2</sup> Also use FAH = 0.72 for 2<9 yr age group.

<sup>3</sup> Also use FAH = 0.73 for 16<30 yr age group.

The FAH is calculated based on a diary of trips taken over a 24-hour period on the survey day. Ninety-five percent of the diary days were on weekdays. Participants can select “vacation” as one of their trips. However, vacation time represented only a fraction (0.68%) of the over 175,000 trips recorded in the survey. Because much of these vacation trips were presumed to be within-day trips and were only a small fraction of total trips, there is likely little overlap with the Exposure Frequency (EF) variate used in the dose equations in Chapter 5.

### 8.2.3 *Exposure Duration for Estimating Cancer Risk to Residents and Off-Site Workers*

OEHHA recommends that an exposure duration (residency time) of 30 years be used to estimate individual cancer risk for the maximally exposed individual resident (MEIR) (Table 8.5). OEHHA also recommends that the 30-year exposure duration be used as the basis for public notification and risk reduction audits and plans. The Districts, however, may opt to use the 70 year cancer risk for notification and risk reduction audits and plans.

Note that the 30-year exposure duration starts in the third trimester to accommodate the increased susceptibility of exposures in early life (OEHHA, 2009), and would apply to both the point estimate and stochastic approaches.

**Table 8.5 Summary of Recommendations for Exposure Duration for Individual Cancer Risk at the MEIR and MEIW**

<b><i>Receptor</i></b>	<b><i>Recommendation</i></b>
Resident (MEIR)	30 years
Resident (supplemental Information)	9 years for central tendency; 70 years for maximum (lifetime)
Worker (MEIW)	25 years

Exposure durations of 9-years and 70-years are also recommended to be evaluated for the MEIR to show the range of cancer risk based on residency periods. If a facility is notifying the public regarding cancer risk, the 9- and 70-year cancer risk estimates are useful for people who have resided in their current residence for periods shorter and longer than 30 years.

The 9-, 30-, and 70-year exposures are chosen to coincide with U.S. EPA’s estimates of the average (9 years), high-end estimates (30-years) of residence time, and a lifetime residency (70 years). These estimates are also consistent with what is known about residence time in California. Together, the 9-, 30-, and 70-year cancer risk calculations provide a useful presentation of cancer risk and the relationship to duration of residency and, thus, exposure to a facility’s emissions.

For the maximally exposed individual worker (MEIW), OEHHA recommends using an exposure duration of 25 years to estimate individual cancer risk for the off-site worker scenario (Table 8.5). This duration represents approximately the 95th percentile of job tenure with the same employer in the U.S.

### 8.2.4 Calculating Residential and Offsite Worker Inhalation Cancer Risk

#### Residential Receptors

For residential inhalation exposure, cancer risk must be separately calculated for specified age groups (Eq. 8.2.4A, see Section 8.2.1), because of age differences in sensitivity to carcinogens and age differences in intake rates (per kg body weight). Separate risk estimates for these age groups provide a health-protective estimate of cancer risk by accounting for greater susceptibility in early life, including both age-related sensitivity and amount of exposure. The following equation illustrates the formula for calculating residential inhalation cancer risk. See Appendix I for a detailed example calculation.

**A. Equation 8.2.4 A:** 
$$\text{RISK}_{\text{inh-res}} = \text{DOSE}_{\text{air}} \times \text{CPF} \times \text{ASF} \times \text{ED/AT} \times \text{FAH}$$

- 7.  $\text{RISK}_{\text{inh-res}}$  = Residential inhalation cancer risk
- 8.  $\text{DOSE}_{\text{air}}$  = Daily inhalation dose (mg/kg-day)
- 9. CPF = Inhalation cancer potency factor (mg/kg-day<sup>-1</sup>)
- 10. ASF = Age sensitivity factor for a specified age group (unitless)
- 11. ED = Exposure duration (in years) for a specified age group
- 12. AT = Averaging time for lifetime cancer risk (years)
- 13. FAH = Fraction of time spent at home (unitless)

#### **a: Recommended default values for EQ 8.2.4 A:**

- 5.  $\text{DOSE}_{\text{air}}$  = Calculated for each age group from Eq. 5.4.1
- 6. CPF = Substance-specific (see Table 7.1)
- 7. ASF = See Section 8.2.1
- 8. ED = 0.25 years for 3<sup>rd</sup> trimester, 2 years for 0<2, 7 years for 2<9, 14 years for 2<16, 14 years for 16<30, 54 years for 16-70
- 9. AT = 70 years\*
- 10. FAH = See Table 8.4

\*Although AT actually sums to 70.25 years when the 3<sup>rd</sup> trimester (0.25 years) is included, OEHHA recommends rounding AT = 70 years (and rounding residential exposure durations at 9- and 30-years rather than 9.25- and 30.25-years) to simplify the calculation without causing a significant adjustment. Note that the dose for the 3<sup>rd</sup> trimester is based on the breathing rate of pregnant women using the assumption that the dose to the fetus during the 3<sup>rd</sup> trimester is the same as that to the mother.

Cancer risks calculated above for individual age groups are summed to estimate cancer risk for 9-, 30- and 70-year exposures as shown below. Note that this example includes the Fraction of Time Spent at Home (FAH) for each age grouping.

**Calculation of Inhalation Cancer Risk from the Third Trimester to Age Nine:**

$$\text{RISK}_{\text{inh-res}} = (\text{DOSE}_{\text{air third trimester}} \times \text{CPF} \times 10 \times 0.25/70 \text{ years} \times \text{FAH}_{3\text{rd tri} <2}) \\ + (\text{DOSE}_{\text{air age } 0<2} \times \text{CPF} \times 10 \times 2/70 \times \text{FAH}_{3\text{rd tri} <2}) + (\text{DOSE}_{\text{air age } 2<9} \times \\ \text{CPF} \times 3 \times 7/70 \text{ years} \times \text{FAH}_{2<9})$$

**Calculation of Inhalation Cancer Risk from Third Trimester to Age 30:**

$$\text{RISK}_{\text{inh-res}} = (\text{DOSE}_{\text{air third trimester}} \times \text{CPF} \times 10 \times 0.25/70 \text{ years} \times \text{FAH}_{3\text{rd tri} <2}) \\ + (\text{DOSE}_{\text{air age } 0<2} \times \text{CPF} \times 10 \times 2/70 \times \text{FAH}_{3\text{rd tri} <2}) + (\text{DOSE}_{\text{air age } 2<16} \times \\ \text{CPF} \times 3 \times 14/70 \times \text{FAH}_{2<16}) + (\text{DOSE}_{\text{air age } 16<30} \times \text{CPF} \times 1 \times 14/70 \text{ years} \times \\ \text{FAH}_{16-30})$$

**Calculation of Inhalation Cancer Risk from Third Trimester to Age 70:**

$$\text{RISK}_{\text{inh-res}} = (\text{DOSE}_{\text{air third trimester}} \times \text{CPF} \times 10 \times 0.25/70 \text{ years} \times \text{FAH}_{3\text{rd tri} <2}) \\ + (\text{DOSE}_{\text{air age } 0<2} \times \text{CPF} \times 10 \times 2/70 \times \text{FAH}_{3\text{rd tri} <2}) + (\text{DOSE}_{\text{air age } 2<16} \times \\ \text{CPF} \times 3 \times 14/70 \times \text{FAH}_{2<16}) + (\text{DOSE}_{\text{air age } 16<70} \times \text{CPF} \times 1 \times 54/70 \text{ years} \times \\ \text{FAH}_{16-70})$$

Expressing cancer risk in “chances per million” is useful as a risk communication tool for the public, but cancer risk can also be expressed in other ways, such as “chances per 100,000” (cancer risk  $\times 10^5$ ) or “chances per 10 million” (cancer risk  $\times 10^7$ ). To convert the resulting cancer risk estimate to chances of developing cancer per million individuals exposed, multiply the cancer risk by  $10^6$ :

$$\text{Cancer risk} \times 10^6 = \text{chances per million}$$

For exposure to multiple carcinogenic substances, Table 8.7 and Table I.5 in Appendix I are examples of how cancer risks of individual substances are summed to determine the total cancer risk.

**Worker Receptors**

For assessment of off-site worker cancer risk at the MEIW, the default assumes working age begins at 16 years. Note that the residential FAH factor in Eq. 8.2.4.A above does not apply for workers. The daily inhalation dose ( $\text{DOSE}_{\text{air}}$ ) (as calculated in Chapter 5, EQ 5.4.1.2) is based on the adjusted 8-hour concentration at the MEIW (for non-continuous sources) and amount of time the offsite worker’s schedule overlaps with the facility’s emission schedule. The duration of exposure at the MEIW receptor is 25 years, as discussed in the TSD (OEHHA, 2012).

**B. Equation 8.2.4 B:** 
$$\text{RISK}_{\text{inh-work}} = \text{DOSE}_{\text{air}} \times \text{CPF} \times \text{ASF} \times \text{ED/AT}$$

1.  $\text{RISK}_{\text{inh-work}}$  = Worker inhalation cancer risk

**a: Recommended default values for EQ 8.2.4 B:**

1.  $\text{DOSE}_{\text{air}}$  = Calculated for workers in Eq. 5.4.1.2
2. CPF = Substance specific (see Table 7.1)
3. ASF = 1 for working age 16-70 yrs (See Section 8.2.1)
4. ED = 25 years
5. AT = 70 yrs for lifetime cancer risk

**Work Locations with Daycare Facilities:**

An additional risk management consideration for offsite worker cancer risk assessment of a Hot Spots facility is whether there are women of child bearing age at the MEIW location and whether the MEIW has a daycare center. In the case of women of child-bearing age at the MEIW, the Districts may wish to treat the off-site MEIW in the same way as the residential scenario to account for the higher susceptibility during the third trimester of pregnancy (i.e., use of an ASF=10 for third trimester exposure). If there is onsite daycare at the MEIW, then the risks to the children will be underestimated using the offsite adult worker scenario. In this case, the Districts may wish to include a cancer risk assessment for the children in the onsite daycare, assuming they could be there from 0 to age 6 years (ED = 6 years) and using the appropriate exposure factors to calculate  $\text{DOSE}_{\text{air}}$ , fraction of time at worksite (e.g., hrs at daycare per 24 hrs), and ASFs in EQ 8.2.4 B to account for the higher susceptibility of infants and children to carcinogens.

Children at a MEIW daycare may also be assessed for noninhalation exposures. Typically, soil ingestion and dermal exposure will be the most common noninhalation pathways. However, all pathways that are present at the daycare should be included. See section 8.2.6 for more discussion of multipathway risk assessment methods.

**8.2.5 Calculation of Noninhalation Cancer Risk**

A small subset of Hot Spots substances is subject to deposition onto the soil, plants, and water bodies (see Table 5.1). These substances need to be evaluated by the appropriate noninhalation pathways, as well as by the inhalation pathway, and the risk characterization results must be presented in all HRAs. These substances include semi-volatile organic chemicals and heavy metals.

For all multipathway substances, the exposure pathways that must be evaluated at every residential and worker site (in addition to inhalation) are soil ingestion and dermal exposure. If PAHs (and creosotes), lead, dioxins, furans, or PCBs are emitted, then the breast-milk consumption pathway becomes mandatory for residential receptors. OEHHA has developed transfer coefficients for these chemicals from the mother to breast milk (see OEHHA, 2012 for details). The other exposure pathways (e.g.,

ingestion of homegrown produce or fish) are only evaluated for residential receptors if the facility impacts that exposure medium and the receptor under evaluation can be exposed to that medium or pathway. For example, if the facility does not impact a fishable body of water within the isopleth of the facility, or the impacted water body does not sustain fish that are consumed by fishers, then the fish pathway will not be considered for that facility or receptor.

Table 8.6 identifies the residential receptor exposure pathways that are mandatory and those that are dependent on the available routes of exposure. Table 8.6 also identifies the three exposure pathways that are relevant for a worker receptor. The cancer risk estimates should be presented in the risk characterization section of the risk assessment for all the appropriate pathways.

**Table 8.6 Mandatory and Site/Route Dependent Exposure Pathways**

Mandatory Exposure Pathways	Site/Route Dependent Exposure Pathways
<ul style="list-style-type: none"> <li>• Inhalation<sup>w</sup></li> <li>• Soil Ingestion<sup>w</sup></li> <li>• Dermal Exposure to Contaminated Soil<sup>w</sup></li> <li>• Breast Milk Consumption<sup>*</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Homegrown Produce Ingestion</li> <li>• Angler-Caught Fish Ingestion</li> <li>• Drinking Water Ingestion</li> <li>• Home-Raised Animal Product Ingestion (Dairy (Cow's) Milk, Meat (Beef, Pork, Chicken) and Egg).</li> </ul>

(w) Identifies the appropriate exposure pathways that should be evaluated for a worker. These pathways are inhalation, dermal exposure, and the soil ingestion pathway.

(\*) If PAHs (including creosotes), lead, dioxins, furans, or PCBs are emitted, then the breast-milk consumption pathway becomes mandatory.

The noninhalation residential cancer risk is calculated using the same steps as inhalation cancer risk described in Section 8.2.4. A dose (see Chapters 4 and 5) from the pathway under evaluation (e.g., soil ingestion) is multiplied by the substance-specific oral slope factor, expressed in units of inverse dose (i.e., (mg/kg/day)<sup>-1</sup>) (Table 7.1), the appropriate age sensitivity factor (ASF), and exposure duration divided by averaging time to yield the cancer risk for a specified age grouping. Cancer risk for each age group is summed as appropriate for the exposure duration. The FAH factor is relevant only to the inhalation pathway and is not appropriate to use in the noninhalation pathways.

Equation 8.2.5 illustrates the formula for calculating noninhalation cancer risk. Details (data, algorithms, and guidance) for each exposure pathway are presented in Chapter 5 and in OEHHA (2012).

**A. Equation 8.2.5:**  $RISK_{noninh} = DOSE_{noninh} \times CPF_{oral} \times ASF \times ED/AT$

1.  $RISK_{noninh}$  = Noninhalation pathway cancer risk
2.  $DOSE_{noninh}$  = Daily dose (mg/kg-day) for a specified non-inhalation pathway for each age group
3.  $CPF_{oral}$  = Oral cancer potency (slope) factor (mg/kg-day<sup>-1</sup>)
4. ASF = Age sensitivity factor for a specified age group (unitless)
5. ED = Exposure duration (in years) for a specified age group
6. AT = Averaging time for lifetime cancer risk

**a: Recommended default values for EQ 8.2.5:**

1.  $DOSE_{noninh}$  = Calculated in Chapter 5 dose algorithms for each age group and for each noninhalation route in Table 8.6 the receptor is exposed to
2.  $CPF_{oral}$  = Substance-specific (see Table 7.1)
3. ASF = See Section 8.2.1
4. ED = Residents: 0.25 years for 3<sup>rd</sup> trimester, 2 years for 0<2, 7 years for 2<9, 14 years for 2<16, 14 years for 16<30, 54 years for 16-70  
= Offsite worker: 25 yrs
5. AT = 70 years

Estimating cancer risk for 9-, 30- and 70-years by summing the individual age-group cancer risks is the same as that shown for the inhalation route in Section 8.2.4. The exception is that the FAH variate is only appropriate for the residential inhalation pathway and is not a factor for oral and dermal exposure pathways.

**Calculation of Noninhalation Cancer Risk from Third Trimester to Age 30:**

$$RISK_{noninh-res} = (DOSE_{noninh} \text{ third trimester} \times CPF \times 10 \times 0.25/70 \text{ years}) + (DOSE_{noninh} \text{ age } 0<2 \times CPF \times 10 \times 2/70) + (DOSE_{noninh} \text{ age } 2<16 \times CPF \times 3 \times 14/70) + (DOSE_{noninh} \text{ age } 16<30 \times CPF \times 1 \times 14/70 \text{ years})$$

To convert this estimated probability of risk to chances per million of developing cancer, multiply the estimated cancer risk for each noninhalation exposure route by 10<sup>6</sup>. This result is useful communication tool to compare risks for each pathway of exposure.

$$\text{Cancer risk} \times 10^6 = \text{cancer risk expressed as chances per million}$$

For assessment of the offsite worker the typical noninhalation pathways that apply for worker cancer risk are the dermal exposure pathway and the soil ingestion pathway.

Children at a MEIW daycare may also be assessed for noninhalation exposures. Typically, soil ingestion and dermal exposure will be the most common noninhalation pathways. However, all pathways that are present at the daycare should be included.

### 8.2.6 *Multipathway Cancer Risk Methodology*

Under a Tier 1 assessment, it is necessary to calculate the total cancer risk from both inhalation and noninhalation exposures if multipathway substances are emitted from the facility. The calculation of cancer risk that includes exposure to a multipathway substance or substances has three steps:

- 1) Calculate cancer risk for the inhalation pathway (EQ 8.2.4 A for residents, EQ 8.2.4 B for off-site workers) for all substances, and the noninhalation pathways that apply (EQ 8.2.5) for all multipathway substances, using high-end point estimates of intake rates.
- 2) For each multipathway substance, identify the two exposure pathways with the highest risk. These are the dominant pathways that are to be assessed using high-end point estimates of intake rates for the total cancer risk. For all other pathways, the average point estimate of intake rates may be used to calculate the pathway cancer risk (See OEHHA (2012) for more information).
- 3) To calculate total cancer risk, all inhalation and noninhalation pathways are summed together for all substances.

The final cancer risk calculation using a combination of high-end and average exposure parameters is referred to as the derived risk in the HARP software. This is described in Chapter 1, Section 1.4.1 of OEHHA (2012). The inhalation route is almost always one of the two dominant pathways in a multipathway cancer risk assessment. Therefore, in most cases only one noninhalation pathway would be calculated using a high-end dose point estimate. For all other pathways, the average point estimate may be used to calculate the pathway cancer risk.

For example, if dermal exposure and soil ingestion risks are calculated, then the cancer risks from these pathways would be summed along with the inhalation cancer risks to give the total cancer risk for the single multipathway substance:

$$\text{Cancer Risk (inhalation)} + \text{Cancer Risk (dermal)} + \text{Cancer Risk (soil)} = \text{Total Risk}$$

The mother's milk pathway also becomes a mandatory pathway to assess risk in nursing infants if the mother is exposed to specific substances (see Table 5.1).

Many facilities will emit multiple carcinogenic substances. If multiple substances are emitted, the substance-specific cancer risks for all exposure pathways are summed to give the (total) multipathway cancer risk at the receptor location. The HARP software will display not only the multipathway risk for each carcinogenic substance, but also show a breakdown of the cancer risk from each exposure pathway. Table 8.7 shows the results of a multipathway risk assessment for a hypothetical facility. While not presented in the following table, it is critical to identify the driving exposure pathways and the driving substances in a multipathway cancer risk assessment when summarizing and presenting the HRA results. See Chapter 9 for more information.

**Table 8.7 Multipathway Assessment of a Hypothetical Facility 30-Year Cancer Risk**

Substance	Cancer Risk <sup>a</sup>	Cancer risk <sup>b</sup> (chances per million)
Arsenic	$1.1 \times 10^{-5}$ (i)	11 (i)
	$3 \times 10^{-7}$ (ni)	0.3 (ni)
Benzene	$2.92 \times 10^{-4}$ (i)	292 (i)
2,3,7,8-TCDD (dioxin)	$1.06 \times 10^{-4}$ (i)	106 (i)
	$5.7 \times 10^{-5}$ (ni)	57 (ni)
1,3-Butadiene	$6.0 \times 10^{-6}$ (i)	6 (i)
<b>Total Facility Cancer Risk</b>	<b><math>4.723 \times 10^{-4}</math></b>	<b>472</b>

<sup>a</sup> As calculated in EQ 8.2.4 A or EQ 8.2.5

<sup>b</sup> Calculated as: cancer risk  $\times 10^6$  = chances per million

i = inhalation pathway contribution

ni = noninhalation pathway contribution

Cancer risk in Table 8.7 for the multipathway substances, arsenic and 2,3,7,8-TCDD, is arranged by the inhalation pathway risk and the sum of all noninhalation pathway risks. The total facility multipathway cancer risk is the sum of all inhalation and noninhalation pathways.

Cancer risks from different substances are treated additively in risk assessment generally, and in the Hot Spots Program in part because many carcinogens act through the common mechanism of DNA damage. The additive assumption is reasonable from a public health point of view. Other possible interactions of multiple carcinogens include synergism (effects are greater than additive) or antagonism (effects are less than additive). The type of interaction is both chemical and dose dependent and in most cases the data are not available to adequately characterize these interactions.

### **8.2.7 Multipathway Cancer Risk for Infant Exposure to Mother's Milk**

The mother's milk pathway becomes mandatory if the nursing mother is exposed to one or more of the following multipathway substances: dioxins and furans, PCBs, PAHs including creosotes, and lead. The default assumption inherent in the intake rate is that the infant's only source of food is breast for the first year (e.g., is fully breastfed, see OEHHA, 2012, for details), which is one-half of the 0-2 year age group used in the Hot Spots program. Thus, the cancer risk by the mother's milk pathway will need to be calculated with a modified cancer risk equation using a different exposure duration:

**A. Equation 8.2.7:**  $\text{RISK}_{\text{mm}} = \text{Dose-Im} \times \text{CPF}_{\text{oral}} \times \text{ASF} \times \text{ED/AT}$

1.  $\text{RISK}_{\text{mm}}$  = Infant cancer risk via mother's milk pathway
2.  $\text{Dose-Im}$  = Daily dose (mg/kg-day) to infant from mother's milk
3.  $\text{CPF}_{\text{oral}}$  = Oral cancer slope factor (mg/kg-day<sup>-1</sup>)
4.  $\text{ASF}$  = Age sensitivity factor for infant (unitless)
5.  $\text{ED}$  = Exposure duration (in years) for infant
6.  $\text{AT}$  = Averaging time for lifetime cancer risk

**a: Recommended default values for EQ 8.2.7:**

6.  $\text{Dose-Im}$  = Calculated from EQ 5.4.3.5.2, dose to infant via mother's milk
7.  $\text{CPF}_{\text{oral}}$  = Substance-specific (see Table 7.1)
8.  $\text{ASF}$  = 10 (See Section 8.2.1)
9.  $\text{ED}$  = 1 yr (1<sup>st</sup> yr of 0<2 yr age group)
10.  $\text{AT}$  = 70 years

Once the cancer risk is determined for the mother's milk pathway for each applicable substance, the pathway risk is summed with other pathway risks.

For Tier 1, the derived approach for cancer risk assessment should be used if the mother's milk pathway applies. As outlined in Section 8.2.6, the two dominant pathways will be calculated using high-end point estimates of intake rates; all additional pathways may be calculated using average point estimates of intake rates. There will be four mandatory pathways to assess (inhalation, mother's milk, soil ingestion and dermal exposure) for cancer risk when exposure to dioxins/furans, PCBs, PAHs including creosotes, and/or lead occurs. Therefore, if the infant is exposed to no other additional site-specific noninhalation pathway(s), only the two dominant pathways among the four will be assessed for cancer risk using high-end point estimates of intake rates; and the others would be assessed using the average point estimate of intake rate.

In short, multipathway cancer risk for a substance is estimated by summing the potential inhalation and noninhalation cancer risks for the receptor location of interest. See the discussion of Tier 1 in Section 8.2.6 or the TSD for more information on the method used to determine the multipathway cancer risk.

### **8.2.8 Cancer Risk Characterization for Stochastic Risk Assessment**

Risk characterization for a stochastic risk assessment is similar to that described for the point-estimate approach. However, the stochastic risk assessment produces a distribution of risk that accounts for some of the natural variability in exposure-related factors, such as breathing rates or water intake. The cancer risk distribution for inhalation cancer risk, for example, is generated by multiplying randomly selected values from the breathing rate distribution by the ground level air concentration, and the cancer potency factor. A variation of the Monte Carlo method called Latin hypercube sampling is the method by which the values from the breathing rate distribution are

selected. If noninhalation pathways need to be evaluated, the same process is followed for each pathway and the risk is summed to give an overall inhalation and noninhalation cancer risk distribution. Further, the specification of Age Sensitivity Factors and the need to separately calculate risks require that a Monte Carlo sampling be conducted for each age group and the cancer risk distributions are then summed across age groups.

The HARP software will perform an HRA using a Monte Carlo analysis with either OEHHA-provided or user-provided data distributions and will include the statistics for the distributions. In risk assessments that have chosen to use the distribution of exposure variates, the cancer risk distribution for a 30-year residential exposure duration (MEIR) should be presented in the risk characterization section. We also recommend including the 9 and 70-year cancer risk at the MEIR as supplemental information. Note that a 70-year exposure duration is required to estimate cancer burden or provide an estimate of population-wide risk. A stochastic approach has not been developed for acute, 8-hour, and chronic noncancer health impacts or worker (MEIW) exposures.

### **8.2.9 Use of Individual Cancer Risk and Population-wide Cancer Risk**

Cancer risk for an individual receptor and a representation of population-wide cancer risk are both important components of a risk assessment. The individual receptor approach reflects the exposures that may occur to an individual receptor over a period of time at a specific location. The individual cancer risk approach has some inherent limitations in terms of illustrating and potentially protecting population-based public health. For example, a facility with a small emissions footprint may impact a few individuals with a high individual potential cancer risk; whereas, a facility with a larger emission footprint may have a lower potential cancer risk for an individual receptor but expose many more people to those levels. Since this larger emitting facility can impact many more people, the population-wide health impacts are magnified due to the larger number of people exposed to the facility's emissions. This potential for higher population impacts is not captured by the individual receptor risk methodology. Therefore, the individual and population-wide health impacts should be presented for all facilities to provide a more complete illustration of the facility's health impacts.

#### **8.2.9.1 Population Risk**

For facilities with large emission footprints (e.g., refineries, ports, or rail yards, etc.), population-based health impacts are critical to provide a better illustration of the potential impacts of emissions since large numbers of people may be exposed to the emissions. The individual cancer risk approach has some inherent limitations in terms of protecting public health. A small facility with a single stack can impact a few individuals with an individual cancer risk that is unacceptable, whereas a large facility may have an individual cancer risk that is below the acceptable limit for individual risk but exposes many more people. Thus, the population-wide impacts are larger for the large facility. Population-wide risk is independent of individual risk, and assumes that a population (not necessarily the same individuals) will live in the impacted zone over a

70-year period. Thus, a 70-year exposure duration is required for estimates of population-wide risks.

To evaluate population risk, one method that regulatory agencies have used is the cancer burden method to account for the number of excess cancer cases that could occur in a population.

### Cancer Burden

The cancer burden can be calculated by multiplying the cancer risk at a census block centroid by the number of people who live in the census block, and adding up the estimated number of potential cancer cases across the zone of impact. The result of this calculation is a single number that is intended to estimate of the number of potential cancer cases within the population that was exposed to the emissions for a lifetime (70 years).

The cancer burden is calculated on the basis of lifetime (70-year) risks (whereas individual cancer risk at the MEIR is based on 30-year residential exposure). Cancer burden is independent of how many people move in or out of the vicinity of an individual facility. For example, if 10,000 people are exposed to a carcinogen at a concentration with a  $1 \times 10^{-5}$  cancer risk for a lifetime the cancer burden is 0.1, and if 100,000 people are exposed to a  $1 \times 10^{-5}$  risk the cancer burden is 1.

### Estimate of Population Wide Risk

An estimate of the number of people exposed at various cancer risk levels can provide perspective on the magnitude of the potential public health threat posed by a facility. This approach is intended as a replacement for or addition to the cancer burden calculation used by some Districts in the past. The new approach provides a much easier way for the general public to interpret results when compared to cancer burden estimates. A facility in a sparsely populated area can have a public health impact different from the same facility in a highly populated area; however, under the cancer burden method, those differences may not be seen. Some suggested approaches and methods for performance of a screening or refined population exposure analyses are provided in Section 4.6.

The District or reviewing authority should be consulted before beginning the population exposure estimates and, as results are generated, further consultation may be necessary. Note that a 70-year exposure duration is required to estimate cancer burden or provide an estimate of population-wide risk.

The zone of impact for estimating the number of persons exposed to a cancer risk from facility emissions should be set at a minimum of a  $10^{-6}$  cancer risk level (see Section 4.6.1). Some Districts may prefer to use a cancer risk of  $10^{-7}$  to define the carcinogenic zone of impact. The total number of persons exposed to a series of potential risk levels can be presented to aid risk managers in understanding the magnitude of the potential public health impacts.

The HARP software can provide population-level risk estimates as cancer burden or as the number of persons exposed to a selected (user-identified) cancer risk level at block level centroids.

#### 8.2.9.2 Population Estimates for Noncancer Health Impacts

A noncancer chronic, 8-hour, and acute population estimate of the number of people exposed to acute, 8-hour, and chronic HQs or HIs exceeding 0.5 or 1.0, in increments of 1.0, should also be presented. For example, a facility with a maximum chronic HI of 4.0 would present the number of people exposed to a chronic HI of 0.5, 1.0, 2.0, 3.0, and 4.0. The isopleths used in this determination should be drawn using the smallest feasible grid size. The same methods that are described in Chapter 4 and Section 8.2.9 (for the population exposure estimate for cancer risk) should be used in the chronic, 8-hour and acute population estimates. Population estimates for acute, 8-hour, and chronic health impacts should be presented separately.

#### 8.2.9.3 Factors That Can Impact Population Risk – Cumulative Impacts

Although the Hot Spots program is designed to address the impacts of single facilities and not aggregate or cumulative impacts, there are a number of known factors that influence the susceptibility of the exposed population and thus may influence population risk. Socioeconomic status influences access to health care, nutrition, and outcome after cancer diagnosis. Community unemployment can affect exposure and residency time near a facility. Factors that affect the vulnerability of the population are discussed in the report *Cumulative Impacts: Building a Scientific Foundation* (OEHHA, 2010). Information on many of these factors is relatively easy to obtain at the census tract level. The OEHHA recommends that these types of factors be considered by the risk manager, along with the quantitative measures of population risk. OEHHA is in the process of developing guidance on quantification of the impact of these factors.

#### **8.2.10 Cancer Risk Evaluation of Short Term Projects**

The local air pollution control districts sometimes use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation. Frequently, the issue of how to address cancer risks from short-term projects arises.

Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime. There are some studies indicating that dose rate changes the potency of a given dose of a carcinogenic chemical. In others words, a dose delivered over a short time period may have a different potency than the same dose delivered over a lifetime.

The OEHHA's evaluation of the impact of early-in-life exposure has reduced some of the uncertainty in evaluating the cancer risk to the general population for shorter-term exposures, as it helps account for susceptibility to carcinogens by age at exposure (OEHHA, 2009).

Due to the uncertainty in assessing cancer risk from very short-term exposures, we do not recommend assessing cancer risk for projects lasting less than two months at the MEIR. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months). Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009). Thus, for example, if the District is evaluating a proposed 5-year mitigation project at a hazardous waste site, the cancer risks for the residents would be calculated based on exposures starting in the third trimester through the first five years of life.

For the MEIW, we recommend using the same minimum exposure requirements used for the residential receptor (i.e., no evaluation for projects less than 2 months; projects longer than 2 months but less than 6 months are assumed to last 6 months; projects longer than 6 months would be evaluated for the duration of the project). Although the off-site worker scenario assumes that the workers are 16 years of age or older with an Age-Sensitivity Factor of 1, another risk management consideration for short-term project cancer assessment is whether there are women of child bearing age at the worksite and whether the MEIW receptor has a daycare center. In this case, the Districts may wish to treat the off-site MEIW in the same way as the residential scenario to account for the higher susceptibility during the third trimester of pregnancy, and for higher susceptibility of infants and children.

Finally, the risk manager may want to consider a lower cancer risk threshold for risk management for very short-term projects. Typical District guidelines for evaluating risk management of Hot Spots facilities range around a cancer risk of 1 per 100,000 exposed persons as a trigger for risk management. Permitting thresholds also vary for each District. There is valid scientific concern that the rate of exposure may influence the risk – in other words, a higher exposure to a carcinogen over a short period of time may be a greater risk than the same total exposure spread over a much longer time period. In addition, it is inappropriate from a public health perspective to allow a lifetime acceptable risk to accrue in a short period of time (e.g., a very high exposure to a carcinogen over a short period of time resulting in a  $1 \times 10^{-5}$  cancer risk). Thus, consideration should be given for very short term projects to using a lower cancer risk trigger for permitting decisions.

### 8.3 Noncancer Acute, 8-Hour, and Chronic Inhalation Health Impacts – the Hazard Index Approach

All substances in the Hot Spots Program that have noncancer health impacts at a receptor must be evaluated through the inhalation pathway. Estimates of noncancer inhalation health impacts are determined by dividing an airborne concentration at the receptor by the appropriate Reference Exposure Level (REL). This is termed the Hazard Index Approach. A REL is used as an indicator of potential noncancer health impacts and is defined as the concentration at which no adverse noncancer health effects are anticipated. When a health impact calculation is performed for a single substance, then it is called the hazard quotient (HQ). Each REL for a substance will have one or more target organ systems (e.g., respiratory system, nervous system, etc.) where the substance can have a noncancer health impact. Thus, all HQs have specified target organ systems associated with them. The sum of the Hazard Quotients of all chemicals emitted that impact the same target organ is termed the Hazard Index. Inhalation RELs for noncancer health impacts have been developed for acute, 8-hour, and chronic exposures to a number of Hot Spots substances. Acute RELs are designed to protect against the maximum 1-hour ground level concentration at the receptor. Eight-hour RELs are designed to protect people with daily 8-hour schedules, such as offsite workers, in an impacted zone. The 8-hour RELs should be used for typical daily work shifts of 8-9 hours. For further questions, assessors should contact OEHHA, the District, or reviewing authority to determine if the 8-hour RELs should be used in your HRA. Any discussions or directions to exclude the 8-hour REL evaluation should be documented in the HRA. Chronic RELs protect against long-term exposure to the annual average air concentration spread over 24 hours/day, 7 days/week.

OEHHA has added 8-hour RELs to the set of noncancer RELs that were previously comprised of acute and chronic RELs (OEHHA, 2008). Specifically, 8-hour RELs are air concentrations at or below which health impacts would not be expected even for sensitive subpopulations in the general population with repeated daily 8-hour exposures over a significant fraction of a lifetime. The 8-hour RELs can be used to evaluate the potential for health impacts (including effects of repeated exposures) in offsite workers, and to children and teachers exposed during school hours. Although not required in the HRA, they could also be applied by the Districts to a residential scenario where a facility operates only a portion of the day and exposure to residences is not adequately reflected by averaging concentrations over a 24 hour day. The number of chemicals with 8-hour RELs will increase as OEHHA re-evaluates RELs for chemicals under SB-25 to ensure that they are protective of children's health.

Acute, 8-hour, and chronic RELs are needed because the dose metrics and even the health impact endpoints may be different with the different exposure durations of acute, daily 8-hour, and chronic exposures. Also, although chronic REL values are lower or set the same as 8-hour RELs, there are some cases such as special meteorological situations (e.g., significant diurnal-nocturnal meteorological differences) or intermittent exposures where the 8-hour REL may be more protective than the chronic REL.

Chapter 4 describes air dispersion modeling and both Chapter 6 and Appendix L list the needed dose-response information to evaluate non-cancer hazards. Appendix I presents sample calculations for determining acute HQs and HIs, 8-hour HQs and HIs, and chronic multipathway HQs and HIs. Chapter 9 provides an outline of information required for risk characterization. The HARP software will calculate the HQ and HI for Hot Spots risk assessments.

### 8.3.1 Calculation of Noncancer Inhalation Hazard Quotient and Hazard Index

To calculate the acute HQ, the maximum 1-hour ground level concentration (in  $\mu\text{g}/\text{m}^3$ ) of a substance at a receptor is divided by the acute 1-hour REL (in  $\mu\text{g}/\text{m}^3$ ) for the substance:

$$\text{Acute Hazard Quotient} = \frac{\text{1-Hour Max Concentration } (\mu\text{g}/\text{m}^3)}{\text{Acute REL } (\mu\text{g}/\text{m}^3)}$$

To calculate the chronic HQ, the annual average ground level concentration of a substance is divided by the chronic REL for the substance:

$$\text{Chronic Hazard Quotient} = \frac{\text{Annual Average Concentration } (\mu\text{g}/\text{m}^3)}{\text{Chronic REL } (\mu\text{g}/\text{m}^3)}$$

To calculate the 8-hour HQ, the adjusted annual average ground level concentration of a substance (represented as “Adjusted  $C_{\text{air}}$ ” in EQ 5.4.1.4 A) is divided by the 8-hour REL for the substance:

$$\text{8-hour Hazard Quotient} = \frac{\text{Adjusted Annual Average Concentration } (\mu\text{g}/\text{m}^3)}{\text{8-hour REL } (\mu\text{g}/\text{m}^3)}$$

The daily 8-hour average ground level concentrations used for calculating the 8-hour HQs are derived as described in Chapter 4.

An HQ of 1.0 or less indicates that adverse health effects are not expected to result from exposure to emissions of that substance. As the HQ increases above one, the probability of human health effects increases by an undefined amount. However, it should be noted that a HQ above one is not necessarily indicative of health impacts due to the application of uncertainty factors in deriving the RELs.

If a receptor is exposed to multiple substances that target the same organ system, then the HQs for the individual substances are summed to obtain a Hazard Index (HI) for that target organ.

Table 8.8 is an example of an HRA spreadsheet showing acute inhalation HQs arranged by target organ system for several substances. The bottom row shows the summed HQs by target organ system to derive the HIs.

**Table 8.8 Individual Hazard Quotients and Total Hazard Index for Acute Inhalation Exposure**

Substance	Reproductive/ Developmental	Nervous System	Cardiovascular System	Respiratory System	Eye
Ammonia				0.6	0.6
Arsenic	0.2	0.2	0.2		
Benzene	0.02				
Chlorine				0.7	0.7
<b>Total Hazard Index</b>	<b>0.22</b>	<b>0.2</b>	<b>0.2</b>	<b>1.3</b>	<b>1.3</b>

A more detailed example of calculating HQs and HIs and of determining noncancer health impacts is shown in Appendix I.

Hazard quotients or HIs for different target organs are not summed together (e.g., do not add the impacts for the eye to the cardiovascular system). Chapter 6 and Appendix L have lists of the organ systems affected by each substance. Unlike the cancer risk algorithms, no exposure duration adjustment (e.g., 9 yrs / 70 yrs) should be made for noncancer assessments.

There are limitations to this method of assessing cumulative noncancer health impacts. The impact on organ systems may not be additive if health effects occur by different mechanisms. However, the impact on organ systems could also be synergistic. An analysis by a trained health professional familiar with the substance's toxicological literature is usually needed to determine the public health significance of an HQ or HI above one. It is recommended that the Air District contact OEHHA if this situation presents itself. For assessing the noncancer health impacts of lead, different procedures are used; please see Appendix F.

### **8.3.2 Calculating Noninhalation (oral) Noncancer Hazard Quotient and Hazard Index**

Similar to the situation with multipathway carcinogenic substances, multipathway substances that present a noncancer hazard are assessed by noninhalation routes of exposure (see Table 8.6). Noninhalation routes of exposure are assessed only for chronic exposure. There are no oral acute RELs since it is generally anticipated that health effects from a single exposure via the oral route at typical environmental levels resulting from deposition of facility emissions would be insignificant relative to the inhalation route. The multipathway substances with noninhalation RELs, called chronic oral RELs, are shown in Table 6.4. Similar to inhalation exposure, the hazard quotient

for a noninhalation pathway is obtained by dividing the dose in milligrams per kilogram-day (mg/kg-day) by the oral REL also expressed in units of mg/kg-day:

$$\text{Chronic Non-inhalation HQ} = \frac{\text{Chronic Noninhalation Dose (mg/kg-day)}}{\text{Chronic Oral REL (mg/kg-day)}}$$

The calculated chronic oral HQs are combined with the chronic inhalation HQs for determining the chronic HIs for each affected target organ (see Section 8.3.4). The point estimates and algorithms for calculating the oral dose for all applicable exposure pathways and receptors (e.g., workers or residents) are explained in Chapter 5.

The chronic oral dose calculated in mg/kg-day is based on a time-weighted average 70-year residential exposure combining the 0<2, 2<16 and 16-70 year age groups. Unlike the assessment of cancer risk, no exposure duration adjustment should be made when estimating HQs. In other words, the variates ED and AT in the cancer risk EQ 8.2.5 in Section 8.2.5 are not used for estimating the noncancer HQs. See Appendix I for an example calculation.

### 8.3.3 *Multipathway Noncancer Risk Methodology*

To determine multipathway chronic noncancer health impacts, it is necessary to calculate the total hazard index from both inhalation and noninhalation exposures. The calculation of HIs has several steps:

- 1) First, the inhalation HQ is calculated for each substance emitted (Section 8.3.1).
- 2) Second, if the substance has an oral REL, then the non-inhalation HQ is calculated as shown above using high-end point-estimates for intake rates for each noninhalation pathway that applies.
- 3) Third, if there are more than two noninhalation pathways to consider for a multipathway substance, then the oral HQ is calculated using high-end point estimates in the dose equation for the two dominant pathways. For any additional noninhalation pathways, the HQs are calculated using average point estimates in the dose equation. This step applies only to residential receptors.
- 4) Fourth, all noninhalation pathway HQs for a multipathway substance are then summed together by target organ to obtain the total noninhalation HQ for a multipathway substance.
- 5) The final step is to sum the inhalation and noninhalation HQs together by target organ to determine the HIs. This step is displayed in Table 8.9. If there is only one substance, then the multipathway HQ is the same as the HI.

**Table 8.9 Substance-Specific Chronic Inhalation and Noninhalation Hazard Quotients and the Hazard Index by Target Organ System**

Substance	Respiratory System	Hematologic System	Alimentary System	Endocrine System	Development	Reproductive System	Nervous System	Cardiovascular System	Skin
Ammonia	0.8								
Arsenic					0.04(i) 0.1(ni)		0.04(i) 0.1(ni)	0.04(i) 0.1(ni)	0.04(i) 0.1(ni)
Benzene		0.08			0.08		0.08		
2,3,7,8-TCDD (dioxin)	0.1(i) 0.2(ni)	0.1(i) 0.2(ni)	0.1(i) 0.2(ni)	0.1(i) 0.2(ni)	0.1(i) 0.2(ni)	0.1(i) 0.2(ni)			
Nickel	0.4(i)	0.4(i)	0.1(ni)						
<b>Hazard Index</b>	<b>1.50</b>	<b>0.78</b>	<b>0.40</b>	<b>0.3</b>	<b>0.52</b>	<b>0.30</b>	<b>0.22</b>	<b>0.14</b>	<b>0.14</b>

i = inhalation pathway contribution

ni = noninhalation pathway contribution

Table 8.9 shows the calculated chronic HIs by combining the chronic inhalation HQs and chronic oral HQs. The HQs or HIs for different target organs are not added together (e.g., do not add the impacts for the respiratory system to the nervous system). The noninhalation pathways for TCDD and arsenic in Table 8.9 have all the noninhalation pathways that apply incorporated into their HQ values. For example, the noninhalation value for arsenic (HQs = 0.1) includes at least the soil ingestion and dermal soil pathways in the HQs because these are the mandatory noninhalation pathways to take into account with exposure to a multipathway substance. For TCDD, the mother's milk pathway is an additional mandatory noninhalation pathway to take into account (See Table 5.1). If there are exposures to any of the site-specific pathways, then these would be included too. A more detailed example calculation of HIs is shown in Appendix I.

When exposure to more than two noninhalation pathways occur, using the high-end point estimates of intake rates for only the two dominant noninhalation pathways will lessen the issue of compounding high-end exposure estimates, while retaining a health-protective approach for the more important exposure pathways. It is unlikely that an individual receptor would be on the high-end of exposure for all the non-inhalation intake parameters (exposure pathways).

### **8.3.4 Summary - Acute, 8-Hour and Chronic Hazard Index Calculation at the MEIR and MEIW**

Eight-hour RELs were developed principally for exposure of individuals during 8-hour work schedules. The 8-hour RELs should be used for typical daily work shifts of 8-9 hours. For further questions, assessors should contact OEHHA, the District, or reviewing authority to determine if the 8-hour RELs should be used in your HRA. Any discussions or directions to exclude the 8-hour REL evaluation should be documented in the HRA. There are currently only a limited number of substances with an 8-hour inhalation REL. Over time as the science supporting REL values for individual substances is reviewed and the RELs are revised by OEHHA, more 8-hour RELs will be developed.

Therefore, for the MEIR, we recommend:

- Estimating the acute Hazard Index based on the maximum 1-hour air concentration and 1-hour RELs
- Estimating the chronic Hazard Index based on the annual average air concentration and the chronic RELs, and the oral RELs for multipathway substances

An 8-hour hazard index based on the daily average 8-hour exposure is not required for the MEIR, but can be performed at the discretion of the District for exposure to non-continuously operating facilities using the adjusted annual average air concentration (See EQ 5.4.1.4 A and B or method in App. M). Eight-hour hazard assessments are not recommended for exposure to continuously operating facilities.

For the MEIW, we recommend:

- Estimating the acute Hazard Index based on the maximum 1-hour air concentration and 1-hour RELs
- Estimating the 8-hour Hazard Index based on daily average 8-hour exposure for those chemicals with 8-hour RELs
- Estimating the chronic Hazard Index based on the annual average air concentration and chronic RELs, and oral RELs for multipathway substances

Until there are 8-hour RELs for many of the Hot Spots substances that have a chronic REL value, we recommend determining the chronic HI for the MEIW to adequately protect the offsite worker.

### **8.3.5 Evaluation of Background Criteria Pollutants**

The District should be contacted to determine if the contribution of background criteria pollutants to respiratory health effects is required to be included in an HRA for the Hot Spots Program. If inclusion is required, the methods for calculating the health impact from acute and chronic exposure (respiratory endpoint) is the standard HI approach (see Sections 8.3.1 and 8.3.4). There are currently no 8-hour RELs for criteria

pollutants, so 8-hour health impacts from criteria pollutants are not assessed in HRAs. The background criteria pollutant contribution should be calculated if the HI from the facility's emissions exceeds 0.5 in either the acute or chronic assessment for the respiratory endpoint.

The most recent criteria pollutant concentration data should be obtained from the ARB's ambient air monitoring network and can be found in the *California Almanac of Emissions and Air Quality* on their web site at [www.arb.ca.gov](http://www.arb.ca.gov). For determining the criteria pollutant contribution in HI calculations, the annual average concentration data should be taken from a monitoring site near the facility. If background contributions are unavailable, the District may direct the risk assessor to make an alternative assumption. The criteria pollutants that should be included in acute and chronic assessments for the respiratory endpoint are ozone, nitrogen dioxide, sulfur dioxide, sulfates, and hydrogen sulfide.

#### **8.4 Uses of Exposure Duration Adjustments for Onsite Receptors**

Onsite workers are protected by CAL OSHA and typically are not evaluated under the Hot Spots program. Exceptions may include a worker who also lives on the facility property such as at prisons, military bases, and universities that have worker housing within the facility. Another scenario where the District may require assessment of on-site worker exposure and risk is when a facility (e.g., airport) has multiple businesses owned by different entities within the facility/property (e.g., rental car agencies, restaurants, etc.). In these situations the evaluation of onsite cancer risks, and/or acute, 8-hour, and chronic noncancer hazard indices is appropriate under the Hot Spots program. If the onsite receptor under evaluation can be exposed through a noninhalation exposure pathway, then that exposure pathway must also be included. When a receptor lives and works on the facility, site, or property, then these receptors should be evaluated and reported under both residential and worker scenarios and the one that is most health-protective should be used for risk management decisions.

The cancer risk estimates for the on-site residents may use a 30-year exposure duration while the 25-year exposure duration is used for a worker. Under a Tier 2 analysis, alternate exposure durations may be evaluated and presented with all assumptions supported. See section 8.2.10 for more discussion of short-term exposures.

Other situations that may require on-site receptor assessment include the presence of locations where the public may have regular access for the appropriate exposure period (e.g., a lunchtime café, store, or museum for acute exposures). The District or reviewing authority should be consulted on the appropriate evaluations for the risk for all onsite receptors.

## 8.5 References

ERG, 2008. Summary Report of the Peer Review Meeting: EPA's Draft Framework for Determining a Mutagenic Mode of Action for Carcinogenicity. Final Report. Submitted to Risk Assessment Forum, Office of the Science Advisor, U.S. Environmental Protection Agency, Washington, DC., by Eastern Research Group. May 23, 2008.

OEHHA, 2010. *Cumulative Impacts: Building a Scientific Foundation*. Available online at: <http://www.oehha.ca.gov>

OEHHA, 2008. *Air Toxics Hot Spots Program Risk Assessment Guidelines*. Technical Support Document for Deriving Noncancer Reference Exposure Levels. Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. Available online at: <http://www.oehha.ca.gov>

OEHHA, 2009. *Air Toxics Hot Spots Program Risk Assessment Guidelines. Technical Support Document for Cancer Potency Factors: Methodologies for derivation, listing of available values, and adjustments to allow for early life stage exposures*. Office of Environmental Health Hazard Assessment, California Environmental Protection Agency. May 2009. Available online at: <http://www.oehha.ca.gov>

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U.S. EPA, 2005a. Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens EPA/630/R-03/003F March 2005.

U.S.EPA, 2005b. Guidelines for Carcinogen Risk Assessment. Risk Assessment Forum, Washington, DC. EPA/630/P-03/001F.

## 9 - Summary of the Requirements for a Modeling Protocol and a Health Risk Assessment Report

The AB 2588 program is a community right-to-know act. Although risk assessment is a technical field, AB 2588 risk assessments need to be clear and understandable to the educated lay person. An Executive Summary that explains the process and the results of the risk assessment in lay terms is necessary. Clear risk communication is imperative in situations where the facility is required to notify the surrounding community. In addition, the risk assessment is by law reviewed by the local Air Pollution Control or Air Quality Management District (District) and OEHHA in order to ensure that AB 2588 risk assessment procedures have been followed. This chapter clarifies the type of information that is needed for District and OEHHA review of modeling protocols and health risk assessments (HRAs).

The material presented here is intended to promote transparent, consistent presentation and efficient review of the modeling protocol and the health risk assessment report (products). We recommend that persons preparing these products consult with the local District to determine if the District has modeling or HRA guidelines that supersede these products. If the District does not have guidelines for these products, then we recommend Section 9.1 be used for modeling protocols and Section 9.2 be used for the presentation of HRAs. Persons preparing modeling protocols and HRAs should specify the guidelines that were used to prepare their products.

### 9.1 Submittal of a Modeling Protocol

It is strongly recommended that a modeling protocol be submitted to the District for review and approval prior to extensive analysis with an air dispersion model. The modeling protocol is a plan of the steps to be taken during the air dispersion modeling and risk assessment process. We encourage people who are preparing protocols to take advantage of the protocol step and fully discuss anticipated methodologies for any portion of your project that may need special consideration. Below, we have provided an example of the format that may be followed in the preparation of the modeling protocol. **Consult with the District to confirm format and content requirements or to determine the availability of District modeling guidelines before submitting the protocol.**

### 9.1.1 *Outline for a Modeling Protocol*

#### *I. Introduction*

Include the facility name, address, and a brief overview describing the facility's operations.

- Provide a description of the terrain and topography surrounding the facility and potential receptors.
- Indicate the format in which data will be provided. Ideally, the report and summary of data will be on paper and all data and model input and output files will be provided electronically (e.g., compact disk or CD).
- Identify the guidelines used to prepare the protocol (e.g., District Guidelines).

#### *II. Emissions*

***For each pollutant and process whose emissions are required to be quantified in the HRA, list the annual average emissions (pounds/year and grams/second) and the maximum one-hour emissions (pounds/hour and grams/second)<sup>1</sup>. Maximum 1-hour emissions are used for acute noncancer health impacts while annual emissions are used for chronic exposures (i.e., chronic and 8-hour noncancer health impacts or cancer risk assessment).***

- Identify the reference and method(s) used to determine emissions (e.g., source tests, emission factors, etc.). Clearly indicate any emission data that are not reflected in the previously submitted emission inventory report. In this event, a revised emission inventory report will need to be submitted to the District.
- Identify if this will be a multipathway assessment based on emitted substances.

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<sup>1</sup> Except radionuclides, for which annual and hourly emissions are reported in Curies/year and millicuries/hour, respectively.

**III. Models / Modeling Assumptions*****Specify the model and modeling assumptions***

- Identify the model(s) to be used, including the version number.
- Identify the model options that will be used in the analysis.
- Identify the modeling domain(s) and the spacing of receptor grid(s). Grid spacing should be sufficient in number and detail to capture the concentration at all of the receptors of interest.
- Indicate complex terrain options that may be used, if applicable.
- Identify the source type(s) that will be used to represent the facility's operations (e.g., point, area, or volume sources, flare options or other).
- Indicate the preliminary source characteristics (e.g., stack height, gas temperature, exit velocity, dimensions of volume source, etc.).
- Identify and support the use of urban or rural dispersion coefficients for those models that require dispersion coefficients. For other models, identify and support the parameters required to characterize the atmospheric dispersion due to land characteristics (e.g., surface roughness, Monin-Obukhov length).

**IV. Meteorological Data*****Specify the type, source, and year(s) of hourly meteorological data (e.g., hourly surface data, upper air mixing height information).***

- State how the data are representative for the facility site.
- Describe QA/QC procedures.
- Identify any gaps in the data; if gaps exist, describe how the data gaps are filled.

**V. Deposition**

- Specify the method to calculate deposition (if applicable).

## VI. *Receptors*

***Specify the type and location of receptors. Include all relevant information describing how the individual and population-related receptors will be evaluated.***

- Identify and describe the location(s) of known or anticipated potential sensitive receptors, the point of maximum impact (PMI), the maximum exposed individual residential (MEIR), and worker (MEIW) receptors. Identify any special considerations or grids that will be used to model these receptors. This information should correspond with information provided in Section III (e.g., fine receptor spacing of 20 meters at the fence line and centered on the maximum impacts; coarse receptor spacing of 100 meters out to 2,000 meters; extra coarse spacing of 1,000 meters out to 20,000 meters).
- Identify if spatial averaging will be used. Include necessary background information on each receptor including how the domain and spacing will be determined for each receptor or exposure pathway.
- Describe how the cancer burden or population impact estimates are calculated. Clarify the same information for the presentation of noncancer population impacts (e.g., centroids of the census tracts in the area within the zone of impact).
- Specify that actual UTM coordinates and the block/street locations (i.e., north side of 3,000 block of Smith Street), where possible, will be provided for specified receptor locations.
- Identify and support the use of any exposure adjustments (e.g., time at location, diurnal).
- Include the list of anticipated exposure pathways that will be included and indicate which substance will be evaluated in the multipathway assessment. Identify if sensitive receptors are present and which receptors will be evaluated in the HRA.

## VII. *Maps*

***Identify how the information will be graphically presented.***

- Indicate which cancer risk isopleths will be plotted for the cancer zone of impact (e.g.,  $10^{-7}$ ,  $10^{-6}$  see Section 4.6.1).
- Indicate the hazard quotients or hazard indices to be plotted for the noncancer acute, 8 hour, and chronic zones of impact (e.g., 0.5, 1.0, etc.).

## 9.2 Health Risk Assessment Report

The purpose of this section is to provide an outline to assist with the preparation and review of HRAs. This outline specifies the key components that should be included in HRAs. All information used for the report must be presented in the HRA. Ideally, the HRA report and a summary of data used in the HRA will be on paper and all data and model input and output files will be provided electronically (e.g., CD). Persons preparing HRAs for the Hot Spots Program should consult the District to determine if HRA guidelines or special formats are to be followed when preparing and presenting the HRA's results.

If District guidelines or formats do not exist that supersede this outline, then the HRA should follow the format presented here. If the HRA is prepared for other programs, the reviewing authority should be consulted for clarification of format and content. We recommend that those persons preparing HRAs specify the guidelines that were used to prepare their product. **The HRA may be considered deficient by the reviewing authority if components that are listed here are not included.**

### 9.2.1 Outline for the Health Risk Assessment Report

#### *I. Table of Contents*

- Section headings with page numbers indicated.
- Tables of tables and Table of figures with page numbers indicated.
- Appendices with page numbers indicated.

#### *II. Executive Summary*

##### ***Overview of all relevant information regarding the project or facility.***

- Facility identifier number (consult the District).
- Description of facility operations and a list identifying emitted substances including table of maximum 1-hour emissions, and annual average emissions.
- Provide a brief description of acute, 8-hour, chronic, and cancer health impacts of the emitted substances, based on OEHHA's descriptions in the appropriate Technical Support Documents.
- Text presenting overview of dispersion modeling and exposure assessment.
- Text describing estimated cancer risk for carcinogens, noncancer Hazard Quotients and Hazard Indices and a table showing target organ systems by substance for noncancer impacts.

- Summarize the individual and population-wide health impacts including the driving substance(s) and the driving exposure pathways:
  - Location (block/street location; e.g., north side of 3,000 block of Smith Street) and description of the off-site point of maximum impact (PMI), maximum exposed individual resident (MEIR), and maximum exposed individual worker (MEIW).
  - Location (block/street location; e.g., north side of 3,000 block of Smith Street) and description of any on-site receptors that were evaluated at the facility (consult District or agency).
  - Location (block/street location; e.g., north side of 3,000 block of Smith Street) and description of any sensitive receptors that are required by the district or reviewing authorities (consult District or agency).

**NOTE: When presenting information described in the following bullets, cancer risk should be presented separately for a residential 30-year, Tier-1 analysis. Results of other exposure assumptions (e.g., 9 or 70-year) or other tier evaluations should also be presented, and must be clearly labeled. For the Hot Spots Program, while the 30-year exposure duration is recommended as the basis for public notification and risk reduction audits and plans, the District has discretion to use the 70 year exposure scenario for its decisions. In addition, the 70 year cancer risk must be calculated to estimate population-wide impacts.**

- Text presenting an overview of the total cancer risk (including multipathway substances, if present) at the PMI, MEIR, MEIW, and sensitive receptors. Provide a table of cancer risk by substance for the MEIR and MEIW (if applicable). Include a statement indicating which of the substances appear to contribute most to (drive) the potential health impacts. In addition, identify the exposure pathways evaluated in the HRA.
- Provide a map of the facility and surroundings and identify the location of the MEIR, MEIW, PMI, and other locations or receptors of interest.
- Provide a map of 30-year and 70-year cancer risk zone of impact(s), if applicable.
- Text presenting an overview of the acute and chronic noncancer hazard quotients and the (total) hazard indices for the PMI, MEIR, MEIW, and sensitive receptors. Additionally, include 8-hour hazard quotients and hazard indices for the MEIW. Include separate statements (for acute, 8-hour, and chronic exposures) indicating which

of the substances appear to drive the potential health impacts. In addition, clearly identify the primary target organ(s) that are impacted from acute, 8-hour, and chronic exposures.

- Identify any sensitive subpopulations (e.g., child daycare facilities, schools, nursing homes) of concern.
- Table and text presenting an overview of estimates of population exposure (e.g., cancer burden or population estimates from HARP) (consult District or agency) (see Section 8.4).
- Version of the Risk Assessment Guidelines and computer program(s) used to prepare the risk assessment (e.g., HARP).

### **III. Risk Assessment Procedures**

#### **A. Hazard identification**

- Table and text identifying all substances emitted from the facility, plus any other substances required by the District or reviewing authority. Include the CAS number of the substance and the physical form of the substance if possible. [The Hot Spots substances are listed in Appendix A, and also in the ARB's Emission Inventory Criteria and Guidelines Regulations (Title 17, California Code of Regulations, Sections 93300-93300.5), and the Emission Inventory Criteria and Guidelines Report (EICG Report), which is incorporated by reference therein (ARB, 1997)].
- Table and text identifying all substances that are evaluated for cancer risk and/or noncancer acute, 8-hour, and chronic health impacts. In addition, identify any multipathway substances that present a cancer risk or chronic noncancer hazard via noninhalation routes of exposure.
- Describe the types and amounts of continuous or intermittent predictable emissions from the facility that occurred during the reporting year. As required by statute, releases from a facility include spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping (fugitive), leaching, dumping, or disposing of a substance into ambient air. Include the substance(s) released and a description of the processes that resulted in long-term and continuous releases.

#### **B. Exposure Assessment**

This section describes the information related to the air dispersion modeling process that needs to be reported in the risk assessment; the information is also presented in Chapter 4 (see Section 4.15). The District may have specific requirements regarding format and content (see Section 4.14). Sample calculations should be provided at each step to indicate how reported emissions

data were used. Reviewing agencies must receive input, output, and supporting files of various model analyses on computer-readable media (e.g., CD).

### **1. Information on the Facility and its Surroundings**

Report the following information regarding the facility and its surroundings:

- Facility Name
- Location (UTM coordinates and street address)
- Land use type (see Section 2.4)
- Local topography
- Facility plot plan identifying:
  - source locations
  - property line
  - horizontal scale
  - building heights
  - emission sources

### **2. Source and Emission Inventory Information**

#### **a. Release Parameters**

Report the following information for each release location in table format:

- Release location identification number
- Release name
- Release type (e.g., point, volume, area, line, pit, etc.)
- Source identification number(s) used by the facility for sources that emit out of this release location
- Release location using UTM coordinates
- Release parameters by release type (e.g., shown for point source):
- Stack height (m), stack diameter (building dimensions for downwash, exhaust gas exit velocity (m/s), exhaust gas volumetric flow rate (ACFM), exhaust gas exit temperature (K), etc.

#### **b. Source Description and Operating Schedule**

The description and operating schedule for each source should be reported in table form including the following information:

- Source identification number used by the facility
- Source name
- Number of operating hours per day and per year (e.g., 0800-1700, 2700 hr/yr)
- Number of operating days per week (e.g., Mon-Sat)

- Number of operating days or weeks per year (e.g., 52 wk/yr excluding major holidays)
- Release point identification number(s) for where source emissions are released
- Fraction of source emissions emitted at each release point by release point ID number

c. Emission Control Equipment and Efficiency

- Report emission control equipment and efficiency by source and by substance

d. Emissions Data Grouped By Source

Report emission rates for each toxic substance, grouped by source (i.e., emitting device or process identified in Inventory Report), in table form including the following information:

- Source name
- Source identification number
- Substance name and CAS number (from Inventory Guidelines)
- Annual average emissions for each substance (lb/yr)
- Hourly maximum emissions for each substance (lb/hr)

e. Emissions Data Grouped by Substance

Report facility total emission rate by substance for all emitted substances listed in the Air Toxics “Hot Spots” Program including the following information:

- Substance name and CAS number (from Inventory Guidelines)
- Annual average emissions for each substance (lb/yr)
- Hourly maximum emissions for each substance (lb/hr)

f. Emission Estimation Methods

Report the methods used in obtaining the emissions data indicating whether emissions were measured or estimated. Clearly indicate any emission data that are not reflected in the previously submitted emission inventory report and submit a revised emission inventory report to the district. A reader should be able to reproduce the risk assessment without the need for clarification.

g. List of Substances

Include tables listing all "Hot Spots" Program substances which are emitted, plus any other substances required by the District. Indicate substances to be evaluated for cancer risks and noncancer effects.

h. Exposed Population and Receptor Location

Report the following information regarding exposed population and receptor locations:

- Description of zone of impact including map showing the location of the facility, boundaries of zone of impact, census tracts, emission sources, sites of maximum exposure, and the location of all appropriate receptors. This should be a true map (one that shows roads, structures, etc.), drawn to scale, and not just a schematic drawing. USGS 7.5 minute maps or GIS based maps are usually the most appropriate choices. (If significant development has occurred since the user's survey, this should be indicated.)
- Separate maps for the cancer risk zone of impact and the hazard index (noncancer) zone of impact(s). The cancer zone of impact should include isopleths down to at least the 1/1,000,000 risk level. Because some districts use a level below 1/1,000,000 to define the zone of impact, the District should be consulted. For the noncancer zone of impact, three separate isopleths (to represent chronic, 8-hour, and acute HI) should be created to define the zone of impact for the hazard index from both inhalation and noninhalation pathways greater than or equal to 0.5. The point of maximum impact (PMI), maximum exposed individual at a residential receptor (MEIR), and maximum exposed individual worker (MEIW) for both cancer and noncancer risks should be located on the maps.
- Tables identifying population units and sensitive receptors (UTM coordinates, receptor IDs or index from the modeling, and street addresses of specified receptors)
- Heights or elevations of the receptor points.
- **Spatial averaging:** For each receptor type (e.g., PMI, MEIR, and MEIW, or other location of interest) that will utilize spatial averaging, the domain size and grid resolution must be clearly identified. If another domain or grid resolution other than 20 meters by 20 meters with 5-meter grid spacing will be used for a receptor, then care should be taken to determine the proper domain size and grid resolution that should be used. For a worker, the HRA shall support all assumptions used, including, but not limited to, documentation for all workers

showing the area where each worker routinely performs their duties. The final domain size should not be greater than the smallest area of worker movement. Other considerations for determining domain size and grid spacing resolution may include an evaluation of the concentration gradients across the worker area. The grid spacing used within the domain should be sufficient in number and detail to obtain a representative concentration across the area of interest. When spatial averaging over the deposition area of a pasture, garden, or water body, care should be taken to determine the proper domain size to make sure it includes all reasonable areas of potential deposition. The size and shape of the pasture, garden, or water body of interest should be identified and used for the modeling domain. The grid spacing or resolution used within the domain should be sufficient in detail to obtain a representative deposition concentration across the area of interest. One way to determine the grid resolution is to include an evaluation of the concentration gradients across the deposition area. The HRA shall support all assumptions used, including, but not limited to, documentation of the deposition area (e.g., size and shape of the pasture or water body, maps, representative coordinates, grid resolution, concentration gradients, etc.). The use or spatial averaging is subject to approval by the reviewing authority. This includes the size of the domain and grid resolution that is used for spatial averaging of a worksite or multipathway deposition area.

### **3. Meteorological Data**

If meteorological data were not obtained directly from the District, then the report must clearly indicate the data source and time period used. Meteorological data not obtained from the District must be submitted in electronic form along with justification for their use including information regarding representativeness and quality assurance.

The risk assessment should indicate if the District required the use of a specified meteorological data set. All memos indicating the District's approval of meteorological data should be attached in an appendix.

### **4. Model Selection and Modeling Rationale**

The report should include an explanation of the model chosen to perform the analysis and any other decisions made during the modeling process. The report should clearly indicate the name of the models that were used, the level of detail (screening or refined analysis) and the rationale behind the selection.

Also report the following information for each air dispersion model used:

- Version number
- Selected options and parameters in table form

- Identify the modeling domain(s) and the spacing of receptor grid(s). Grid spacing should be sufficient in number and detail to capture the concentration at all receptors of interest.

## 5. Air Dispersion Modeling Results

The report should include tables, text, and appendices that clearly present all of the following information

- Maximum hourly and annual average concentrations of chemicals at appropriate receptors such as the residential and worker MEI receptors
- Annual average and maximum one-hour (and 30-day average for lead only) concentrations of chemicals at appropriate receptors listed and referenced to computer printouts of model outputs
- Model printouts (numbered), annual concentrations, maximum hourly concentrations
- Disk with input/output files for air dispersion program (e.g., the AERMOD input file containing the regulatory options and emission parameters, receptor locations, meteorology, etc.)
- Include tables that summarize the annual average concentrations that are calculated for all the substances at each site. The use of tables that present the relative contribution of each emission point to the receptor concentration is recommended. (These tables should have clear reference to the computer model which generated the data. It should be made clear to any reader how data from the computer output were transferred to these tables.) [As an alternative, the above two tables could contain just the values for sites of maximum impact (i.e., PMI, MEIR and MEIW), and sensitive receptors, if required. All the values would be found in the Appendices.]

### C. Health Values Used in Dose-Response and Dose Estimates

- Provide tables of the acute, 8-hour and chronic inhalation RELs, chronic oral RELs (if applicable), and cancer potency factors for each substance that is quantified in the HRA.
- Identify the guidelines (title and date) that were used to obtain these factors, or indicate whether newly approved values obtained from the OEHHA website were used.
- Provide a table of target organ systems for each noncancer substance, including acute (1 hour), 8-hour, and chronic inhalation, and chronic oral (if applicable).

- Include tables of the estimated dose for each substance by each exposure pathway at the PMI, MEIR, MEIW, and at any sensitive receptor locations (required by the District).

#### **D. Risk Characterization**

The Hot Spots Analysis and Reporting Program (HARP) will generate the risk characterization data needed for the outline below. Any data needed to support the risk characterization findings should be clearly presented and referenced in the text and appendices. A listing of HARP output files that meet these HRA requirements is provided in this outline under the section entitled "Appendices". All HARP files should be included in the HRA. Ideally, the HRA report and a summary of data used in the HRA will be on paper and all data and model input and output files will be provided electronically (e.g., CD). Information on obtaining copies of HARP is available on the California Air Resources Board's Internet web site under the Air Toxics Program at [www.arb.ca.gov](http://www.arb.ca.gov).

**NOTE:** The cancer risk for the PMI, MEIR, and sensitive receptors of interest must be presented in the HRA's text, tables, and maps. OEHHA recommends that cancer risk for a 30-year exposure duration be presented for the MEIR, and that cancer risk for 9-year and 70-year exposure durations for the MEIR be presented to provide the risk managers with supplemental information. Note that the assessment of population impacts must be based on a 70-year exposure duration; thus all risk assessments need to estimate cancer risk for a 70-year exposure duration in order to report the number of individuals residing in the risk isopleths, or to calculate cancer burden if the District so requires. In addition, some Districts may opt to make risk management decisions based on a 70-year exposure duration. The MEIW location should use a 25-year exposure period.

All HRAs must include the results of a Tier-1 exposure assessment (see Chapter 2 and 8, or the 2012 TSD). If the reviewing authority specifies that additional exposure periods should be presented, or if persons preparing the HRA would like to present additional information (i.e., exposure duration adjustments or the inclusions of risk characterizations using Tier-2 through Tier-4 exposure data), then this information should be presented in separate, clearly titled, sections, tables, and text.

***The following information should be presented in this section of the HRA. If not fully presented here, then by topic, clearly identify the section(s) and pages within the HRA where this information is presented.***

- Description of receptors to be quantified.
- Table and text providing the location [UTM coordinates, receptor ID number or index from the modeling, and the block/street address

- (e.g., north side of 3,000 block of Smith Street)] and description of the PMI, MEIR, and MEIW for both cancer and noncancer risks.
- Separate tables and text providing description of the PMI and MEIR for 30-year cancer risk, and 9- or 70-year cancer risk.
  - Tables and text describing MEIW 25-year cancer risk.
  - Table and text providing the location [UTM coordinates, receptor ID number or index from the modeling, and the block/street address (e.g., north side of 3,000 block of Smith Street)] and description of any sensitive receptor that is of interest to the District or reviewing authorities (consult District or agency).
  - Provide any exposure information that is used for risk characterization (e.g., concentrations at receptors, emissions information, census information, figures, zone of impact maps, etc.). If multipathway substances are emitted, identify the site/route dependent exposure pathways (e.g., water ingestion) for the receptor(s), where appropriate (e.g., MEIR).
  - Provide a summary of the site-specific inputs used for each exposure pathway (e.g., water or grazing intake assumptions). This information may be presented in an appendix with the information clearly presented and cross-referenced to the text. In addition, provide reference to the appendix (section and page number) that contains the modeling (i.e., HARP/dispersion modeling) files that show the same information.
  - If any exposure parameters were used other than those provided in the Air Toxics Risk Assessment Guidelines: Technical Support Document for Exposure Assessment and Stochastic Analysis (2012), they must be presented in detail. The derivation and data used must be presented so that it is clear to the reviewer. The justification for using site-specific exposure parameters must be clearly presented.
  - Table and text presenting the potential multipathway cancer risk by substance, by pathway, and total, at the PMI, MEIR, MEIW, and sensitive receptor locations (required by the District).
  - Table and text presenting the acute (inhalation only) and chronic noncancer (inhalation and oral) hazard quotients (by substance, exposure pathways, and target organs) and the (total) hazard indices by substance and target organs for the PMI, MEIR, MEIW, and sensitive receptors. For 8-hour exposure at the MEIW (inhalation only), table and text presenting hazard quotients (by substance, exposure pathways, and target organs) and the (total) hazard indices by substance and target organs. Note:

Chronic noncancer results should be shown with inhalation and oral contributions (shown separately) and for the combined (multipathway) impact.

- Identify any sensitive subpopulations (e.g., child daycare facilities, schools, nursing homes) of concern.
- Table and text presenting estimates of population exposure (e.g., population exposure estimates or cancer burden from HARP) (consult District or agency). Tables should indicate the number of persons exposed to a (total) cancer risk greater than  $10^{-7}$ ,  $10^{-6}$ ,  $10^{-5}$ ,  $10^{-4}$ , etc., and total hazard quotient or hazard index greater than 0.5, 1.0, 2.0, and 3.0, etc. Provide a table that shows excess cancer burden for each population unit and the total excess cancer burden, if cancer burden calculation is required.
- Provide maps that illustrate the HRA results for the three sub-bullet points below. These maps should be an actual street map of the area impacted by the facility with elevation contours and actual UTM coordinates, and the facility boundaries clearly labeled. In some cases the elevation contours will make the map too crowded and should therefore not appear. This should be a true map (one that shows roads, structures, etc.), drawn to scale, and not just a schematic drawing. USGS 7.5-minute maps are usually the most appropriate choice (see Section 4.6).
  - The facility (emission points and boundaries), the locations of the PMI, MEIR, MEIW, and sensitive receptors.
  - Maps of the cancer zone of impacts (e.g.,  $10^{-6}$  or  $10^{-7}$  levels - consult District or Agency). The map should clearly identify the zone of impact for the inhalation pathway, the minimum exposure pathways (soil ingestion, dermal exposure, and breast-milk consumption) if multipathway substances are emitted, and the zone of impact for all the applicable exposure pathways (minimum exposure pathways plus any additional site/route specific pathways) for multipathway analyses. Two maps may be needed to accomplish this. The legend of these maps should state the level(s) used for the zone of impact and identify the exposure pathways that were included in the assessment.
  - Maps of the noncancer hazard index (HI) zone of impacts (e.g., 0.5 or 1.0 - consult District or Agency). The noncancer maps should clearly identify the noncancer zones of impact. These include the acute (inhalation), 8-hour (inhalation), chronic (inhalation), and chronic (multipathway) zones of impact. For clarity, presentation of the noncancer zones of impact may require two or more maps. The

legend of these maps should state the level(s) used for the zone of impact and identify the exposure pathways.

- The risk assessor may want to include a discussion of the strengths and weaknesses of the risk analyses and associated uncertainty directly related to the facility HRA.
- If appropriate, comment on the possible alternatives for control or remedial measures. How do the risks compare?
- If possible, identify any community concerns that influence public perception of risk.
- Sample calculations may be needed for all analyses in the HRA if proprietary software other than HARP was used. The District should be consulted. These calculations should be clearly presented and referenced to the findings they are supporting in the HRA text.
- Version of the Risk Assessment Guidelines and computer program used to prepare the risk assessment.
- If software other than HARP is used for the health assessment modeling, all supporting material must be included with the HRA (e.g., all algorithms and parameters used in a clear, easy to review format).

#### **E. References**

Include any references used for the HRA in this section.

#### **F. Appendices**

The appendices should contain all data, sample calculations, assumptions, and all modeling and risk assessment files that are needed to reproduce the HRA results. Ideally, a summary of data used in the HRA will be on paper and all data and model input and output files will be provided electronically (e.g., CD), unless otherwise specified by the district or reviewing authority. All appendices and the information they contain should be referenced, clearly titled, and paginated.

#### ***Potential Appendix Topics (if not presented elsewhere in the HRA report):***

- List of all receptors locations (UTM coordinates, receptor ID number or index from the modeling, and the block/street address (e.g., north side of 3,000 block of Smith Street)) for the PMI, MEIR, MEIW, and sensitive receptors.
- List of all emitted substances.
- All emissions files.

- List of dose-response factors (Reference Exposure Levels and cancer potency factors).
- All air dispersion modeling input and output files. Detailed discussions of meteorological data, regulatory options, emission parameters, receptor locations, etc.
- Census data.
- Maps.
- Identify the site/route dependent exposure pathways for the receptor(s), where appropriate (e.g., MEIR). Provide a summary of the site-specific inputs used for each pathway (e.g., water or grazing intake assumptions) and the data to support them.
- All calculations used to determine emissions, concentrations, and potential health impacts at the PMI, MEIR, MEIW, and sensitive receptors.
- All HRA model input and output (HARP) files for receptors of concern.
- (Total) cancer and noncancer impacts by receptor, substance, and exposure pathway (by endpoint for noncancer) at all receptors.
- Presentation of alternate risk assessment methods (e.g., alternate exposure durations, or Tier-2 to Tier-4 evaluations with supporting information).

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## List of Abbreviations

A - Area

AB2588 - Air Toxics "Hot Spots" Information and Assessment Act, 1987

ACFM - Actual Cubic Feet per Minute

ADL - Annual Dermal Load

AQMD - Air Quality Management District (District)

ARB - Air Resources Board

ASF - Age Sensitivity Factor

AT - Average Time for Lifetime Cancer Risk

BAF - Bioaccumulation Factor

BG - Urban Block Groups

BLP - Buoyant Line and Point Source Dispersion Model

BMI - Breast Milk Intake

BPIP - Building Profile Input Program

BPIPPRM - Building Profile Input Program for PRIME

BSA - Body Surface Area

BW - Bodyweight

$C_{air}$  - annual average air concentration

CALMPRO - Calms processor program

CAPCOA - California Air Pollution Control Officer's Association

CAS - Chemical Abstracts Service

CERCLA - Comprehensive Environmental Response, Compensation and Liability Act

$C_f$  - Average concentration of a substance in fish

$C_m$  - Average concentration of a substance in mother's milk (misabeled on 114 as  $C_f$ )

$C_{fa}$  - Average concentration of a substance in animal products

CONST2 - Constant in the Briggs' stable plume rise equation using BLP

CONST3 - Constant in the Briggs' neutral plume rise equation using BLP

CPF - Cancer Potency Factor

CRIT - Convergence criterion for the line source calculations using BLP

$C_s$  - Concentration of Substance in the Soil

CTDMPLUS - Complex Terrain Dispersion Model

CTSCREEN - Complex Terrain Screening Model

$C_v$  - Average concentration of a substance in and on vegetation

$C_w$  - Concentration of a Substance in the Water

DECFAF - Pollutant decay factor for use with BLP

DF - Discount Factor

$DOSE_{air}$  - Daily inhaled dose

$DOSE_{fa}$  - Exposure through ingesting home-raised or farm animal products

$DOSE_{fish}$  - Exposure through ingestion of angler-caught fish

Dose- $lm$  - Exposure through mother's milk ingestion

$DOSE_p$  - Exposure through ingesting home-grown produce

$DOSE_{water}$  - Exposure through ingesting water

DTHTA - Vertical potential temperature gradient  
DTSC - Department of Toxic Substance Control  
EASA - Exposure Assessment and Stochastic Analysis  
ED - Rural Enumeration Districts or Exposure Duration (in years)  
EF - Exposure Frequency  
EICG - Emission Inventory Criteria and Guidelines  
EPA - Environmental Protection Agency  
EQ - Equation  
F - Fahrenheit  
FAH - Fraction of Time at Home  
FG - Fraction of diet provided by grazing  
GIS - Geographic Information Systems  
GLC - Ground-Level Concentrations  
GRAF - Gastrointestinal Relative Absorption Factor  
HARP - Hot Spots Analysis and Reporting Program  
HESIS - Hazard Evaluation System and Information Service  
HI - Hazard Index  
HQ - Hazard Quotient  
HRA - Health Risk Assessment  
HSC - Health and Safety Code  
IARC - International Agency for Research on Cancer  
IDELS - Maximum variation in number of stability classes per hour (BLP option)  
ISCST3 - Industrial Source Complex Short Term  
IUPAC - International Union of Pure and Applied Chemistry  
K - Kelvin  
L - Fraction of locally-grown (source-impacted) feed that is not pasture (site-specific)  
LOAEL - Lowest Observed Adverse Effects Level  
LOD - Level of Detection  
LSHEAR - Plume rise wind shear (BLP option)  
LTRANS - Transitional point source plume rise (BLP option)  
MAXIT - Maximum iterations allowed for line source calculations (BLP option)  
MEIR - Maximally Exposed Individual Resident  
MEIW - Maximally Exposed Individual Worker  
METDB - Meteorological Database  
METS - Metabolic Equivalents  
MPRM - Meteorological Processor for Regulatory Models  
MWF - Molecular Weight Adjustment Factor  
NAS - National Academy of Sciences  
NCDC - National Climatic Data Center  
NOAEL - No Observed Adverse Effects Level  
NTP - National Toxicology Program  
NWS - National Weather Station  
OCD - Offshore and Coastal Dispersion Model  
OEHHA - Office of Environmental Health Hazard Assessment  
p - Population density  
PAH - Polycyclic Aromatic Hydrocarbons

PCB - Polychlorinated Biphenyl  
PCDD - Polychlorinated dibenzo-p-dioxins  
PCDF - Polychlorinated dibenzofurans  
PEXP - Vertical wind speed power law profile exponents  
PM2.5 - Particulate Matter less than 2.5 microns in diameter  
PM10 - Particulate Matter less than 10 microns in diameter  
PMI - Point of Maximum Impact  
QA - Quality Assurance  
QC - Quality Control  
RCRA - Resource Conservation and Recovery Act  
REL - Reference Exposure Level  
RfC - Reference Concentration  
RfD - Reference Dose  
SCRAM - Support Center for Regulatory Air Models  
SDM - Shoreline Dispersion Model  
SIR - Soil Ingestion Rate  
SMAQMD - Sacramento Metropolitan Air Quality Management District  
SRP - Scientific Review Panel  
TAC - Toxic Air Contaminant  
Tco – Biotransfer coefficient  
TEF - Toxic Equivalency Factor  
TERAN – Terrain option in BLP  
TSD - Technical Support Document  
TSP - Total Suspended Particulates  
UCL - Upper Confidence Limits  
USGS - U.S. Geological Survey  
UTM - Universal Transvers Mercator  
WAF - Worker Adjustment Factor  
WHO - World Health Organization

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