

***MADRONE CARPENTERS
TRAINING CENTER
CONSTRUCTION AIR QUALITY AND
COMMUNITY RISK ASSESSMENT***

Morgan Hill, CA

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Introduction

The purpose of this report is to address construction air quality emissions and community risk impacts associated with the proposed Carpenters Training Center in Morgan Hill, California. This project would involve construction, which would be the primary source of toxic air contaminant (TAC) and fine particulate matter (PM_{2.5}) emissions that could lead to community risk impacts, or in other words, increase health risks at sensitive receptors. This analysis addresses those issues following the guidance provided by the Bay Area Air Quality Management District (BAAQMD).

Project Description

The project proposes to construct a 55,000 square foot carpenters training center at 18640 Madrone Parkway. The proposed training center would include workshop areas, classrooms, break rooms, offices and a lobby/receptionist area. The maximum height of the proposed building would be 32 feet above ground surface, at the top of the roof. The project would provide a surface parking lot with 196 parking spaces. The building would also include a yard area for outdoor training and material storage. An eight-foot concrete wall would be constructed around the yard area. The existing six-foot concrete wall, located between the residences to the north and the project site, would remain.

Setting

The project is located in Santa Clara County, which is in the San Francisco Bay Area Air Basin. Ambient air quality standards have been established at both the State and federal level. The Bay Area meets all ambient air quality standards with the exception of ground-level ozone, respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}).

Toxic Air Contaminants

Toxic air contaminants (TAC) are a broad class of compounds known to cause morbidity or mortality (usually because they cause cancer) and include, but are not limited to, the criteria air pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, State, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs.

Regulatory Agencies

The BAAQMD is the regional agency tasked with managing air quality in the region. At the State level, the CARB (a part of the California Environmental Protection Agency [EPA]) oversees regional air district activities and regulates air quality at the State level. The BAAQMD has recently published California Environmental Quality Act (CEQA) Air Quality Guidelines that are used in this assessment to evaluate air quality impacts of projects.

Regulatory Setting

Federal Regulations

The United States Environmental Protection Agency (EPA) sets nationwide emission standards for mobile sources, which include on-road (highway) motor vehicles such trucks, buses, and automobiles, and non-road (off-road) vehicles and equipment used in construction, agricultural, industrial, and mining activities (such as bulldozers and loaders). The EPA also sets nationwide fuel standards. California also has the ability to set motor vehicle emission standards and standards for fuel used in California, as long as they are the same or more stringent than the federal standards.

In the past decade the EPA has established a number of emission standards for on- and non-road heavy-duty diesel engines used in trucks and other equipment. This was done in part because diesel engines are a significant source of NO_x and particulate matter (PM₁₀ and PM_{2.5}) and because the EPA has identified DPM as a probable carcinogen. Implementation of the heavy-duty diesel on-road vehicle standards and the non-road diesel engine standards are estimated to reduce particulate matter and NO_x emissions from diesel engines up to 95 percent in 2030 when the heavy-duty vehicle fleet is completely replaced with newer heavy-duty vehicles that comply with these emission standards.¹

In concert with the diesel engine emission standards, the EPA has also substantially reduced the amount of sulfur allowed in diesel fuels. The sulfur contained in diesel fuel is a significant contributor to the formation of particulate matter in diesel-fueled engine exhaust. The new standards reduced the amount of sulfur allowed by 97 percent for highway diesel fuel (from 500 parts per million by weight [ppmw] to 15 ppmw), and by 99 percent for off-highway diesel fuel (from about 3,000 ppmw to 15 ppmw). The low sulfur highway fuel (15 ppmw sulfur), also called ultra-low sulfur diesel (ULSD), is currently required for use by all vehicles in the U.S.

All of the above federal diesel engine and diesel fuel requirements have been adopted by California, in some cases with modifications making the requirements more stringent or the implementation dates sooner.

¹ USEPA, 2000. *Regulatory Announcement, Heavy-Duty Engine and Vehicle Standards and Highway Diesel Fuel Sulfur Control Requirements*. EPA420-F-00-057. December.

Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. The closest sensitive receptors to the project site are residents of a single-family home north of the project site. There are additional residences at farther distances from the project site. This project would not introduce new sensitive receptors to the area.

Significance Thresholds

In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA and these significance thresholds were contained in the District's 2011 *CEQA Air Quality Guidelines*. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA. The thresholds were challenged through a series of court challenges and were mostly upheld. BAAQMD updated the *CEQA Air Quality Guidelines* in 2017 to include the latest significance thresholds that were used in this analysis are summarized in Table 1.

Table 1. Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (Exhaust)	82	15
PM _{2.5}	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards	Single Sources Within 1,000-foot Zone of Influence	Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)	
Excess Cancer Risk	>10.0 per one million	>100 per one million	
Hazard Index	>1.0	>10.0	
Incremental annual PM _{2.5}	>0.3 µg/m ³	>0.8 µg/m ³	
Note: ROG = reactive organic gases, NO _x = nitrogen oxides, PM ₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less.			

Construction Period Emissions

The Bay Area is considered a non-attainment area for ground-level ozone and PM_{2.5} under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM₁₀ under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM₁₀, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone precursor pollutants (ROG and NO_x), PM₁₀, and PM_{2.5} and apply to both construction period and operational period impacts.

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate emissions from construction and operation of the site assuming full build-out of the project. The project land use types and size, and anticipated construction schedule were input to CalEEMod. The model output from CalEEMod is included as *Attachment 2*.

CalEEMod Modeling

CalEEMod provided annual emissions for construction and estimates emissions for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activity includes worker, hauling, and vendor traffic. A construction build-out scenario, including equipment list and schedule, was based on information provided by the project applicant. The proposed project land uses were entered into CalEEMod as follows:

- 55,000 square feet (sf) entered as “Junior College (2 year)”⁵,
- 196 parking spaces and 35,124-sf entered as “Parking Lot”,
- 3,50 cubic yards (cy) of soil exported during grading,
- 85 cement truck round trips during building construction, and
- 400-cy of asphalt hauled during paving.

Construction would begin September 2019 and last nine months. There were an estimated 90 construction workdays. Average daily emissions were computed by dividing the total construction emissions by the number of construction days. Table 2 shows average daily construction emissions of ROG, NO_x, PM₁₀ exhaust, and PM_{2.5} exhaust during construction of the project. As indicated in Table 2, predicted the construction period emissions would not exceed the BAAQMD significance thresholds and *less-than-significant*.

⁵ CalEEMod does not have a land uses that specifically address a carpenter’s training center. The “Junior College” land use was chosen because it includes technical colleges, which is the most appropriate land use for the proposed project.

Table 2. Construction Period Emissions

Scenario	ROG	NOx	PM ₁₀ Exhaust	PM _{2.5} Exhaust
Total construction emissions (tons)	0.33 tons	0.42 tons	0.02 tons	0.02 tons
Average daily emissions (pounds)¹	7.30 lbs./day	9.24 lbs./day	0.34 lbs./day	0.31 lbs./day
<i>BAAQMD Thresholds (pounds per day)</i>	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Exceed Threshold?	No	No	No	No
Notes: ¹ Assumes 90 workdays.				

Additionally, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM₁₀ and PM_{2.5}. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less-than-significant if best management practices are implemented to reduce these emissions. *Mitigation Measure AQ-1 would implement BAAQMD-recommended best management practices.*

Mitigation Measure AQ-1: Include measures to control dust and exhaust during construction.

During any construction period ground disturbance, the applicant shall ensure that the project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. Additional measures are identified to reduce construction equipment exhaust emissions. The contractor shall implement the following best management practices that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne

toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Effectiveness of Mitigation Measure AQ-1

The measures above are consistent with BAAQMD-recommended basic control measures for reducing fugitive particulate matter that are contained in the BAAQMD CEQA Air Quality Guidelines.

Construction Community Health Risk Impacts

Project impacts related to increased community risk can occur either by introducing a new sensitive receptor, such as a residential use, in proximity to an existing source of TACs or by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors in the project vicinity. The project would not introduce new sensitive receptors, nor would the project introduce a new TAC source to the area. However, temporary project construction activity would generate dust and equipment exhaust on a temporary basis that could affect nearby sensitive receptors. A construction health risk assessment was prepared to address the impacts the project would have on surrounding sensitive receptors. Community risk impacts are addressed by predicting increased lifetime cancer risk, the increase in annual PM_{2.5} concentrations and computing the Hazard Index (HI) for non-cancer health risks. The methodology for computing community risks impacts is contained in *Attachment 1*.

Project Construction Activity

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. These exhaust air pollutant emissions would not be considered to contribute substantially to existing or projected air quality violations as seen in Table 2. Construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was conducted that evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and PM_{2.5}.⁶ This assessment included dispersion modeling to predict the offsite and onsite concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated.

⁶ DPM is identified by California as a toxic air contaminant due to the potential to cause cancer.

Construction Period Emissions

The CalEEMod model provided total annual PM₁₀ exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles, with total emissions from all construction stages as 0.0174 tons (35 pounds). The on-road emissions are a result of haul truck travel during demolition and grading activities, worker travel, and vendor deliveries during construction. A trip length of one mile was used to represent vehicle travel while at or near the construction site. It was assumed that these emissions from on-road vehicles traveling at or near the site would occur at the construction site. Fugitive PM_{2.5} dust emissions were calculated by CalEEMod as 0.00924 tons (19 pounds) for the overall construction period.

Dispersion Modeling

The U.S. EPA ISCST3 dispersion model was used to predict DPM and PM_{2.5} concentrations at existing sensitive receptors (residences) in the vicinity of the project construction area. The ISCST3 dispersion model is a BAAQMD-recommended model for use in modeling these types of emission activities for CEQA projects.⁷ The ISCST3 modeling utilized two area sources to represent the on-site construction emissions; one for DPM exhaust emissions and the other for fugitive PM_{2.5} dust emissions. To represent the construction equipment exhaust emissions, an emission release height of six meters (19.7 feet) was used for the area source. The elevated source height reflects the height of the equipment exhaust pipes and buoyancy of the exhaust plume. For modeling fugitive PM_{2.5} emissions, a near ground level release height of two meters (6.6 feet) was used for the area source. Emissions from vehicle travel around the project site were included in the modeled area sources. Construction emissions were modeled as occurring daily between 7:30 a.m. and 4:30 p.m. as per the project applicant's construction schedule.

The modeling used a five-year data set (2001 - 2005) of hourly meteorological data from San Martin Airport prepared for use with the ISCST3 model by the BAAQMD. The airport is about 5 miles southeast of the project site. Annual DPM and PM_{2.5} concentrations from construction activities in 2019 - 2020 were calculated using the model. DPM and PM_{2.5} concentrations were calculated at nearby residential locations at receptor heights of 1.5 meters (4.9 feet) to represent the breathing heights of the residents in nearby single-family homes.

The maximum-modeled annual DPM and PM_{2.5} concentrations, which includes both the DPM and fugitive PM_{2.5} concentrations, were identified at nearby sensitive receptors (as shown in Figure 1) to find the maximally exposed individuals (MEIs). The cancer risk calculations are based on applying the BAAQMD recommended age sensitivity factors to the TAC concentrations. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. BAAQMD-recommended exposure parameters were used for the cancer risk calculations, as described in *Attachment 1*. Third trimester, infant and adult exposures were assumed to occur at all residences through the entire construction period. *Attachment 3* includes the construction emission calculations and source information used in the modeling and the cancer risk calculations.

⁷ Bay Area Air Quality Management District (BAAQMD), 2012. *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May.

Community Risk Impacts

The maximum concentrations occurred at a single-family residence (1.5 meters) immediately north of the project site as seen in Figure 1. Results of this assessment indicated that the maximum increased residential cancer risk would exceed the BAAQMD singles-source threshold of greater than 10.0 per million. The maximum PM_{2.5} concentration and HI do not exceed their respective BAAQMD single-source thresholds.

Figure 1. Project Construction Site, Locations of Off-Site Sensitive Receptors, and Maximum TAC Impact



Highway - U.S. Route 101

BAAQMD provides a Google Earth *Highway Screening Analysis Tool* that can be used to identify screening level impacts from State highways. The tool estimates risk and hazard impacts throughout the Bay Area and segments the highways into various links. Link 197 and Link 199 were portions of the highway that were closest to the construction MEI. The lifetime cancer risk, annual PM_{2.5} exposure and non-cancer hazard index corresponding to the distance between the Construction MEI and the highway were used. The data were based on a distance of 750 feet south from the highway. The risk and hazards from both links at this distance were then averaged. The predicted cancer risk was then adjusted using a factor of 1.3744 to account for new OEHHA guidance. This factor was provided by BAAQMD for use with their CEQA screening tools that are used to predict cancer risk.

Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using BAAQMD's *Stationary Source Risk & Hazard Analysis Tool*. This mapping tool uses Google Earth and identified the location of one possible stationary source and its estimated risk and hazard impacts. A Stationary Source Information Form (SSIF) containing the identified sources was prepared and submitted to BAAQMD.⁸ The District noted that Comcast-Morgan Hill (i.e. Plant #15543) was demolished and they provided an emission file for the Flextronics International, USA facility (i.e. Plant #19691). The daily emission file showed that the stationary source did not have a cancer risk, PM_{2.5} concentrations, nor a HI value. Therefore, Plant #19691 was not included in the cumulative analysis.

Cumulative Health Risk Impact at Construction MEI

Table 3 reports both the project and cumulative community risk impacts at the sensitive receptor most affected by construction (i.e. the construction MEI). Without mitigation, the project would have a *significant* impact with respect to community risk caused by project construction activities, since the maximum cancer risk does exceed the BAAQMD single-source threshold of greater than 10.0 per million. However, as seen in Table 3, *Mitigation Measures AQ-1 and AQ-2 would reduce these impacts to less-than-significant*. The combined annual cancer risk, PM_{2.5} concentration, and Hazard risk values, which includes unmitigated and mitigated, would not exceed the cumulative threshold. Therefore, the project would also have a *less-than-significant* impact regarding the cumulative risk within the area.

⁸ Correspondence with Areana Flores, BAAQMD, 19 March 2019.

Attachment 1: Health Impact Evaluation Methodology

A health risk assessment (HRA) for exposure to Toxic Air Contaminates (TACs) requires the application of a risk characterization model to the results from the air dispersion model to estimate potential health risk at each sensitive receptor location. The State of California Office of Environmental Health Hazard Assessment (OEHHA) and California Air Resources Board (CARB) develop recommended methods for conducting health risk assessments. The most recent OEHHA risk assessment guidelines were published in February of 2015.¹⁰ These guidelines incorporate substantial changes designed to provide for enhanced protection of children, as required by State law, compared to previous published risk assessment guidelines. CARB has provided additional guidance on implementing OEHHA's recommended methods.¹¹ This HRA used the 2015 OEHHA risk assessment guidelines and CARB guidance. The BAAQMD has adopted recommended procedures for applying the newest OEHHA guidelines as part of Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants.¹² Exposure parameters from the OEHHA guidelines and the recent BAAQMD HRA Guidelines were used in this evaluation.

Cancer Risk

Potential increased cancer risk from inhalation of TACs are calculated based on the TAC concentration over the period of exposure, inhalation dose, the TAC cancer potency factor, and an age sensitivity factor to reflect the greater sensitivity of infants and children to cancer causing TACs. The inhalation dose depends on a person's breathing rate, exposure time and frequency and duration of exposure. These parameters vary depending on the age, or age range, of the persons being exposed and whether the exposure is considered to occur at a residential location or other sensitive receptor location.

The current OEHHA guidance recommends that cancer risk be calculated by age groups to account for different breathing rates and sensitivity to TACs. Specifically, they recommend evaluating risks for the third trimester of pregnancy to age zero, ages zero to less than two (infant exposure), ages two to less than 16 (child exposure), and ages 16 to 70 (adult exposure). Age sensitivity factors (ASFs) associated with the different types of exposure are an ASF of 10 for the third trimester and infant exposures, an ASF of 3 for a child exposure, and an ASF of 1 for an adult exposure. Also associated with each exposure type are different breathing rates, expressed as liters per kilogram of body weight per day (L/kg-day). As recommended by the BAAQMD for residential exposures, 95th percentile breathing rates are used for the third trimester and infant exposures, and 80th percentile breathing rates for child and adult exposures. For children at schools and daycare facilities, BAAQMD recommends using the 95th percentile breathing rates. Additionally, CARB and the BAAQMD recommend the use of a residential exposure duration of

¹⁰ OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

¹¹ CARB, 2015. *Risk Management Guidance for Stationary Sources of Air Toxics*. July 23.

¹² BAAQMD, 2016. *BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*. December 2016.

30 years for sources with long-term emissions (e.g., roadways). For workers, assumed to be adults, a 25-year exposure period is recommended by the BAAQMD.

Under previous OEHHA and BAAQMD HRA guidance, residential receptors are assumed to be at their home 24 hours a day, or 100 percent of the time. In the 2015 Risk Assessment Guidance, OEHHA includes adjustments to exposure duration to account for the fraction of time at home (FAH), which can be less than 100 percent of the time, based on updated population and activity statistics. The FAH factors are age-specific and are: 0.85 for third trimester of pregnancy to less than 2 years old, 0.72 for ages 2 to less than 16 years, and 0.73 for ages 16 to 70 years. Use of the FAH factors is allowed by the BAAQMD if there are no schools in the project vicinity that would have a cancer risk of one in a million or greater assuming 100 percent exposure (FAH = 1.0).

Functionally, cancer risk is calculated using the following parameters and formulas:

$$\text{Cancer Risk (per million)} = CPF \times \text{Inhalation Dose} \times ASF \times ED/AT \times FAH \times 10^6$$

Where:

- CPF = Cancer potency factor (mg/kg-day)⁻¹
- ASF = Age sensitivity factor for specified age group
- ED = Exposure duration (years)
- AT = Averaging time for lifetime cancer risk (years)
- FAH = Fraction of time spent at home (unitless)

$$\text{Inhalation Dose} = C_{\text{air}} \times DBR \times A \times (EF/365) \times 10^{-6}$$

Where:

- C_{air} = concentration in air (µg/m³)
- DBR = daily breathing rate (L/kg body weight-day)
- A = Inhalation absorption factor
- EF = Exposure frequency (days/year)
- 10⁻⁶ = Conversion factor

The health risk parameters used in this evaluation are summarized as follows:

Parameter	Exposure Type →	Infant		Child		Adult
	Age Range →	3 rd Trimester	0<2	2 < 9	2 < 16	16 - 30
DPM Cancer Potency Factor (mg/kg-day) ⁻¹		1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
Daily Breathing Rate (L/kg-day) 80 th Percentile Rate		273	758	631	572	261
Daily Breathing Rate (L/kg-day) 95 th Percentile Rate		361	1,090	861	745	335
Inhalation Absorption Factor		1	1	1	1	1
Averaging Time (years)		70	70	70	70	70
Exposure Duration (years)		0.25	2	14	14	14
Exposure Frequency (days/year)		350	350	350	350	350
Age Sensitivity Factor		10	10	3	3	1
Fraction of Time at Home		0.85-1.0	0.85-1.0	0.72-1.0	0.72-1.0	0.73

Non-Cancer Hazards

Potential non-cancer health hazards from TAC exposure are expressed in terms of a hazard index (HI), which is the ratio of the TAC concentration to a reference exposure level (REL). OEHHA has defined acceptable concentration levels for contaminants that pose non-cancer health hazards. TAC concentrations below the REL are not expected to cause adverse health impacts, even for sensitive individuals. The total HI is calculated as the sum of the HIs for each TAC evaluated and the total HI is compared to the BAAQMD significance thresholds to determine whether a significant non-cancer health impact from a project would occur.

Typically, for residential projects located near roadways with substantial TAC emissions, the primary TAC of concern with non-cancer health effects is diesel particulate matter (DPM). For DPM, the chronic inhalation REL is 5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Annual PM_{2.5} Concentrations

While not a TAC, fine particulate matter (PM_{2.5}) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under the California Environmental Quality Act (CEQA). The thresholds of significance for PM_{2.5} (project level and cumulative) are in terms of an increase in the annual average concentration. When considering PM_{2.5} impacts, the contribution from all sources of PM_{2.5} emissions should be included. For projects with potential impacts from nearby local roadways, the PM_{2.5} impacts should include those from vehicle exhaust emissions, PM_{2.5} generated from vehicle tire and brake wear, and fugitive emissions from re-suspended dust on the roads.

Attachment 2: CalEEMod Model Outputs

Attachment 3: Construction Health Risk Assessment Madrone Carpenters Training Center, Morgan Hill, CA

DPM Emissions and Modeling Emission Rates

Construction Year	Activity	DPM (ton/year)	Area Source	DPM Emissions			Modeled Area (m ²)	DPM Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2019-2020	Construction	0.0147	CON_DPM	29.5	0.00897	1.13E-03	19,303	5.86E-08

Construction Hours
 hr/day = 9 (7:30am - 4:30pm)
 days/yr = 365
 hours/year = 3285

PM2.5 Fugitive Dust Emissions for Modeling

Construction Year	Activity	Area Source	Area (ton/year)	PM2.5 Emissions			Modeled Area (m ²)	PM2.5 Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2019-2020	Construction	CON_FUG	0.00927	18.5	0.00564	7.11E-04	19,303	3.68E-08

Construction Hours
 hr/day = 9 (7:30am - 4:30pm)
 days/yr = 365
 hours/year = 3285

DPM Construction Emissions and Modeling Emission Rates - With Mitigation

Construction Year	Activity	DPM (ton/year)	Area Source	DPM Emissions			Modeled Area (m ²)	DPM Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2019-2020	Construction	0.00903	CON_DPM	18.1	0.00550	6.93E-04	19,303	3.59E-08

Construction Hours
 hr/day = 9 (7:30am - 4:30pm)
 days/yr = 365
 hours/year = 3285

PM2.5 Fugitive Dust Construction Emissions for Modeling - With Mitigation

Construction Year	Activity	Area Source	Area (ton/year)	PM2.5 Emissions			Modeled Area (m ²)	PM2.5 Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2019-2020	Construction	CON_FUG	0.00228	4.6	0.00139	1.75E-04	19,303	9.06E-09

Construction Hours
 hr/day = 9 (7:30am - 4:30pm)
 days/yr = 365
 hours/year = 3285

Madrone Carpenters Training Center, Morgan Hill, CA - Construction Health Impact Summary

Maximum Impacts at MEI Location - Unmitigated

Emissions Year	Maximum Concentrations		Cancer Risk (per million)		Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu\text{g}/\text{m}^3$)
	Exhaust PM10/DPM ($\mu\text{g}/\text{m}^3$)	Fugitive PM2.5 ($\mu\text{g}/\text{m}^3$)	Infant/Child	Adult		
	2019-2020	0.0783	0.1167	13.9	0.2	0.016

Maximum Impacts at MEI Location - With Mitigation

Emissions Year	Maximum Concentrations		Cancer Risk (per million)		Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu\text{g}/\text{m}^3$)
	Exhaust PM10/DPM ($\mu\text{g}/\text{m}^3$)	Fugitive PM2.5 ($\mu\text{g}/\text{m}^3$)	Infant/Child	Adult		
	2019-2020	0.0480	0.0287	8.5	0.1	0.010

Madrone Carpenters Training Center, Morgan Hill, CA - Construction Impacts - Without Mitigation
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction
Impacts at Off-Site MEI Location - 1.5 meter receptor height

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)⁻¹
 ASF = Age sensitivity factor for specified age group
 ED = Exposure duration (years)
 AT = Averaging time for lifetime cancer risk (years)
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10⁻⁶

Where: C_{air} = concentration in air (µg/m³)
 DBR = daily breathing rate (L/kg body weight-day)
 A = Inhalation absorption factor
 EF = Exposure frequency (days/year)
 10⁻⁶ = Conversion factor

Values

Parameter	Infant/Child				Adult
	3rd Trimester	0 - 2	2 - 9	2 - 16	16 - 30
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	631	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Maximum		
			DPM Conc (ug/m3)		Age Sensitivity Factor		Modeled		Age Sensitivity Factor	Adult Cancer Risk (per million)	Fugitive PM2.5	Total PM2.5
			Year	Annual			Year	Annual				
0	0.25	-0.25 - 0*	2019-2020	0.0783	10	1.06	2019-2020	0.0783	-	-	-	
1	1	0 - 1	2019-2020	0.0783	10	12.86	2019-2020	0.0783	1	0.22	0.1167	
2	1	1 - 2			10	0.00			1	0.00		
3	1	2 - 3			3	0.00			1	0.00		
4	1	3 - 4			3	0.00			1	0.00		
5	1	4 - 5			3	0.00			1	0.00		
6	1	5 - 6			3	0.00			1	0.00		
7	1	6 - 7			3	0.00			1	0.00		
8	1	7 - 8			3	0.00			1	0.00		
9	1	8 - 9			3	0.00			1	0.00		
10	1	9 - 10			3	0.00			1	0.00		
11	1	10 - 11			3	0.00			1	0.00		
12	1	11 - 12			3	0.00			1	0.00		
13	1	12 - 13			3	0.00			1	0.00		
14	1	13 - 14			3	0.00			1	0.00		
15	1	14 - 15			3	0.00			1	0.00		
16	1	15 - 16			3	0.00			1	0.00		
17	1	16-17			1	0.00			1	0.00		
18	1	17-18			1	0.00			1	0.00		
19	1	18-19			1	0.00			1	0.00		
20	1	19-20			1	0.00			1	0.00		
21	1	20-21			1	0.00			1	0.00		
22	1	21-22			1	0.00			1	0.00		
23	1	22-23			1	0.00			1	0.00		
24	1	23-24			1	0.00			1	0.00		
25	1	24-25			1	0.00			1	0.00		
26	1	25-26			1	0.00			1	0.00		
27	1	26-27			1	0.00			1	0.00		
28	1	27-28			1	0.00			1	0.00		
29	1	28-29			1	0.00			1	0.00		
30	1	29-30			1	0.00			1	0.00		
Total Increased Cancer Risk						13.9				0.22		

* Third trimester of pregnancy

**Madrone Carpenters Training Center, Morgan Hill, CA - Construction Impacts - With Mitigation
Maximum DPM Cancer Risk and PM2.5 Calculations From Construction
Impacts at Off-Site MEI Location - 1.5 meter receptor height**

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 AT = Averaging time for lifetime cancer risk (years)
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Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10⁻⁶

Where: C_{air} = concentration in air (µg/m³)
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 EF = Exposure frequency (days/year)
 10⁻⁶ = Conversion factor

Values

Age --> Parameter	Infant/Child				Adult
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ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	631	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

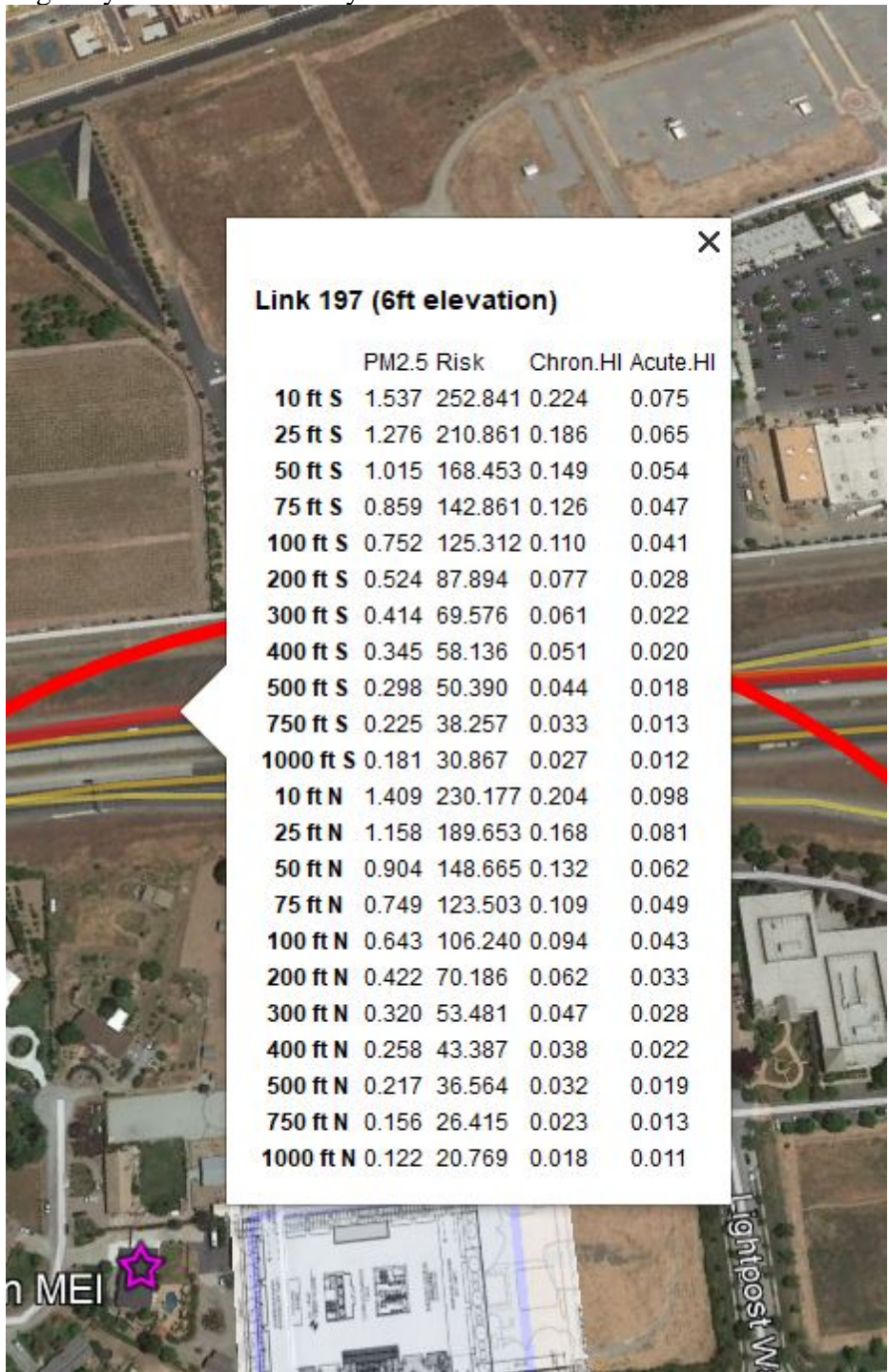
Construction Cancer Risk by Year - Maximum Impact Receptor Location

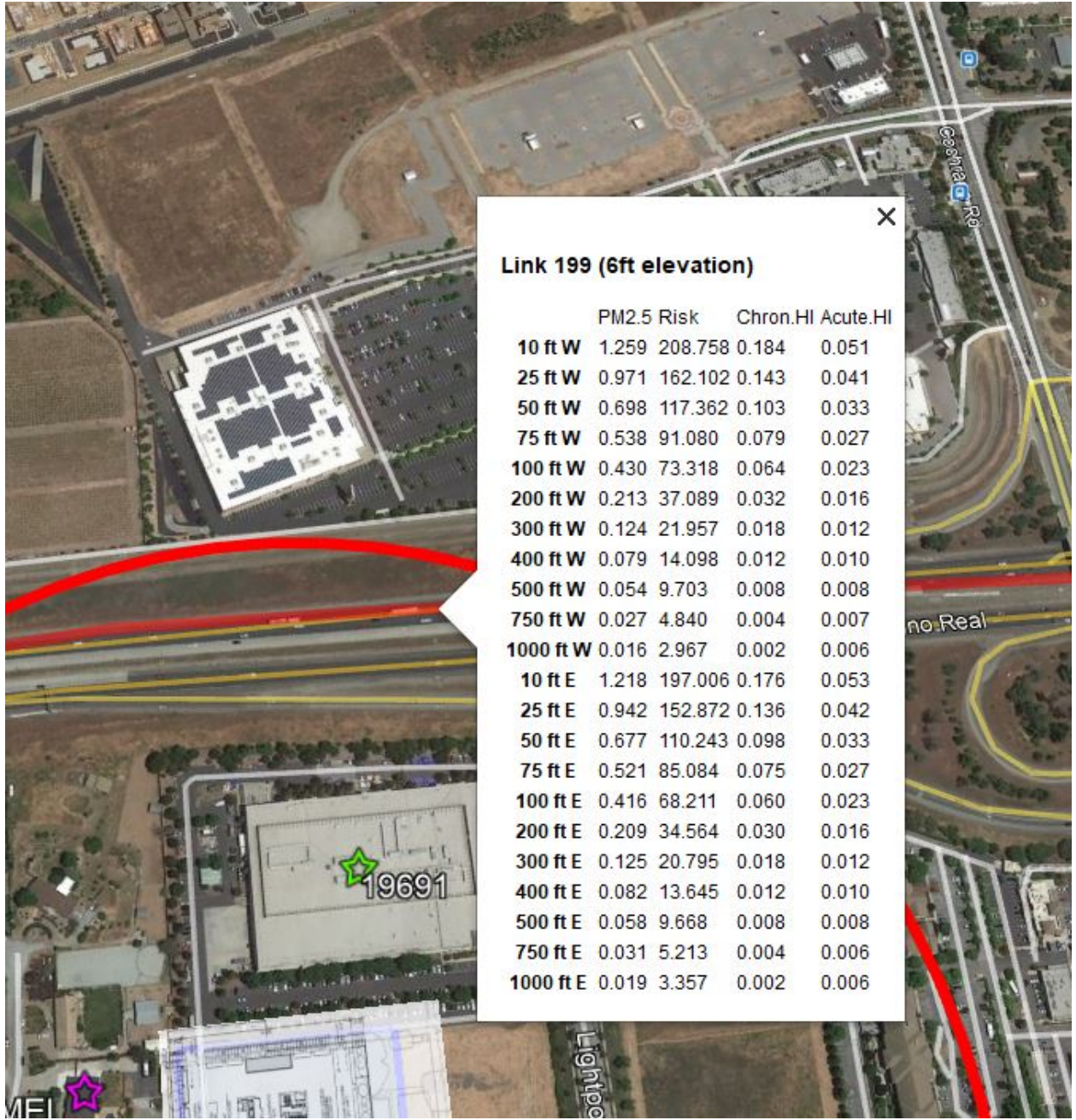
Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information		Age Sensitivity Factor	Infant/Child Cancer Risk (per million)	Adult - Exposure Information		Age Sensitivity Factor	Adult Cancer Risk (per million)	Maximum	
			DPM Conc (ug/m3)				Modeled				Fugitive PM2.5	Total PM2.5
			Year	Annual			Year	Annual				
0	0.25	-0.25 - 0*	2019-2020	0.0480	10	0.65	2019-2020	0.0480	-	-		
1	1	0 - 1	2019-2020	0.0480	10	7.88	2019-2020	0.0480	1	0.14	0.0287	0.0767
2	1	1 - 2			10	0.00			1	0.00		
3	1	2 - 3			3	0.00			1	0.00		
4	1	3 - 4			3	0.00			1	0.00		
5	1	4 - 5			3	0.00			1	0.00		
6	1	5 - 6			3	0.00			1	0.00		
7	1	6 - 7			3	0.00			1	0.00		
8	1	7 - 8			3	0.00			1	0.00		
9	1	8 - 9			3	0.00			1	0.00		
10	1	9 - 10			3	0.00			1	0.00		
11	1	10 - 11			3	0.00			1	0.00		
12	1	11 - 12			3	0.00			1	0.00		
13	1	12 - 13			3	0.00			1	0.00		
14	1	13 - 14			3	0.00			1	0.00		
15	1	14 - 15			3	0.00			1	0.00		
16	1	15 - 16			3	0.00			1	0.00		
17	1	16-17			1	0.00			1	0.00		
18	1	17-18			1	0.00			1	0.00		
19	1	18-19			1	0.00			1	0.00		
20	1	19-20			1	0.00			1	0.00		
21	1	20-21			1	0.00			1	0.00		
22	1	21-22			1	0.00			1	0.00		
23	1	22-23			1	0.00			1	0.00		
24	1	23-24			1	0.00			1	0.00		
25	1	24-25			1	0.00			1	0.00		
26	1	25-26			1	0.00			1	0.00		
27	1	26-27			1	0.00			1	0.00		
28	1	27-28			1	0.00			1	0.00		
29	1	28-29			1	0.00			1	0.00		
30	1	29-30			1	0.00			1	0.00		
Total Increased Cancer Risk						8.53				0.14		

* Third trimester of pregnancy

Attachment 4: Cumulative Source Risk Screening Calculations

Highway 101 Risk Summary





Link 199 (6ft elevation)

	PM2.5 Risk	Chron.HI	Acute.HI	
10 ft W	1.259	208.758	0.184	0.051
25 ft W	0.971	162.102	0.143	0.041
50 ft W	0.698	117.362	0.103	0.033
75 ft W	0.538	91.080	0.079	0.027
100 ft W	0.430	73.318	0.064	0.023
200 ft W	0.213	37.089	0.032	0.016
300 ft W	0.124	21.957	0.018	0.012
400 ft W	0.079	14.098	0.012	0.010
500 ft W	0.054	9.703	0.008	0.008
750 ft W	0.027	4.840	0.004	0.007
1000 ft W	0.016	2.967	0.002	0.006
10 ft E	1.218	197.006	0.176	0.053
25 ft E	0.942	152.872	0.136	0.042
50 ft E	0.677	110.243	0.098	0.033
75 ft E	0.521	85.084	0.075	0.027
100 ft E	0.416	68.211	0.060	0.023
200 ft E	0.209	34.564	0.030	0.016
300 ft E	0.125	20.795	0.018	0.012
400 ft E	0.082	13.645	0.012	0.010
500 ft E	0.058	9.668	0.008	0.008
750 ft E	0.031	5.213	0.004	0.006
1000 ft E	0.019	3.357	0.002	0.006

Plant #23703 Emissions File

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
CRITERIA POLLUTANTS - ABATED
MOST RECENT P/O APPROVED (2019)

Printed: MAR 18, 2019

NxEdge MH, LLC (P# 23703)

S#	SOURCE NAME	SOURCE CODE	PM	EMISSIONS IN LBS/DAY			CO
				ORG	NOx	S02	
1	Wipe Cleaning	SF01A157	.0	9.6	.0	.0	.0
		SF01B455	.0	.0	.0	.0	.0