APPENDIX H
Screening Level Health Risk Assessment

UltraSystems
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MEMO

TO: Bobby Allard, Allard Engineering

FROM: Michael B. Rogozen, D. Env.

DATE: April 19, 2022

PROJECT #: 7106

RE: Screening Air Toxics Health Risk Assessment for the Summit Avenue Warehouse Project, Fontana, California

1.0 BACKGROUND

This screening health risk assessment (HRA) was conducted in support of an Initial Study/Mitigated Negative Declaration (IS/MND) prepared under the California Environmental Quality Act (CEQA). It covers a proposed warehouse facility at Sierra Avenue and Summit Avenue, in Fontana, California. The project site is adjacent to industrial uses on the north, east and south; and residential developments on the west and southwest. The facility will be visited at all hours of the day by diesel trucks. As the California Air Resources Board (ARB) has formally designated particulate emissions from diesel engines as a toxic air contaminant (TAC),[1] this screening HRA focuses on diesel particulate matter (DPM) emissions from project construction equipment and from diesel trucks used in freight service.

The purpose of this screening HRA was to address partially question III.c of the CEQA Guidelines: "Would the project expose sensitive receptors to substantial pollutant concentrations?" Exposure of sensitive receptors to criteria pollutants is discussed in **Section 4.3.6** of the IS/MND. This screening HRA expands the discussion to exposure to diesel exhaust. HRAs frequently cover cancer and noncancer health risks. As will be discussed below, this analysis was limited to cancer risk. The objective was to determine whether the increase in maximum individual cancer risk (MICR) would exceed the CEQA significance threshold established by the South Coast Air Quality Management District (SCAQMD). That threshold is a risk increase of 10 in one million (10×10^{-6}).[2] The main differences between this screening analysis and a full HRA is that it uses simplified "worst-case" assumptions about meteorology in modeling atmospheric dispersion of project emissions. Generally, this approach results in higher risk estimates than those using more detailed information about

1 The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines. Fact Sheet. California Air Resources Board, Sacramento, CA. October 1998. https://www.arb.ca.gov/toxics/dieseltac/factsht1.pdf.

2 SCAQMD Air Quality Significance Thresholds. South Coast Air Quality Management District. April 2019. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2.

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emissions and meteorology. If the screening analysis shows that risk would be less than significant, then more detailed modeling is not necessary.

2.0 PROPOSED PROJECT

The project applicant proposes to construct and operate an approximately 102,380-square-foot warehouse building and related uses on approximately 4.49 gross acres of land at the northeast corner of Summit Avenue and Sierra Avenue in Fontana, California (APN 0239-161-28). The project would consist of 92,380 square feet of warehousing space, 5,000 square feet of office space on first floor, 5,000 square feet of office space on a mezzanine floor, 11 dock-high doors, 3 trailer stalls, and 53 automobile parking stalls. Landscape improvements are also proposed onsite. Utility connections to water, sewer, and electricity would be constructed.

Primary site ingress and egress would be provided by a 30-foot-wide driveway along the northwestern edge of the project site along Sierra Avenue. The proposed project would include 11 dock doors and three trailer stalls in compliance with the City's requirements. There would be 53 automobile parking stalls that would consist of three American Disabilities Act (ADA) stalls and 50 regular parking stalls in the northern portion of the project site. Circulation within the site would be along the 26-foot-wide fire lane inside the northern and southern perimeters of the project site, and a 30-foot-wide fire lane inside the eastern perimeter of the project site. The number of truck trips per day is estimated to be 53.[3]

3.0 METHODS

3.1 Overview

The HRA generally followed procedures prescribed by the SCAQMD for analyzing cancer risks from mobile source diesel idling emissions.[4] Although "Idling" is in the title, the guidance covers emissions from truck traffic on local streets and/or arterials, onsite truck movement, and onsite truck idling.[5] Given that construction equipment operates onsite and moves from place to place, it is similar in nature to onsite truck movement and idling, and was therefore analyzed in accordance with the SCAQMD guidance. The analysis consisted of three steps:

- Estimation of emissions;
- Dispersion modeling to calculate ground-level concentrations of diesel particulate matter (DPM) in the vicinity of the site; and
- Calculation of individual cancer risk.

Additional guidance was obtained from a review of a recent HRA in the project area[6] and from SCAQMD comments on health risk assessments reported in various CEQA documents.

3 See **Attachment 1**.

4 Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Idling Emissions for CEQA Air Quality Analysis. South Coast Air Quality Management District, Diamond Bar, CA. August 2003.

5 The guidance also includes transportation refrigeration units and auxiliary power units, but those devices were assumed not to be included in the proposed project.

6 Air Quality, Health Risk, and Greenhouse Gas Analysis Report. Santa Ana Avenue and Citrus Avenue Warehouse Project. City of Fontana, San Bernardino County, California. Prepared by First Carbon Solutions, San Bernardino, CA for Seefried Industrial Properties, Inc., Phoenix, AZ. January 6, 2016.

Note that for this screening assessment, emissions and exposures along local roadways were not analyzed. UltraSystems' experience in preparing full HRAs for two warehouses in Fontana found that the roadway exposure contributes a minor amount (about 4%) of the total risk.

3.2 Emissions Estimates

Following ARB guidance,[7] the analysis used particulate matter with an aerodynamic diameter less than 10 micrometers (PM_{10}) to represent DPM. This is a conservative approach, since about 90% of DPM emissions are actually less than 2.5 micrometers ($PM_{2.5}$),[8] and $PM_{2.5}$ emissions are always less than or equal to those of PM_{10}.

3.2.1 Construction Emissions

Onsite PM_{10} emissions during construction were obtained from the CalEEMod analysis conducted for the air quality and greenhouse gas emissions report prepared for the project.[9] A time-weighted average daily PM_{10} emission rate was calculated as shown in **Table 3.2-1**.

Table 3.2-1
TIME-WEIGHTED DPM EMISSIONS DURING CONSTRUCTION

Activity and Year	Days	PM_{10} Emissions (lb/day)	Product
Site Preparation (2022)	3	0.5952	1.7856
Grading (2022)	6	0.7423	4.4538
Building Construction (2022)	122	0.7022	85.6684
Building Construction (2023)	18	0.6136	11.0448
Paving (2023)	10	0.4338	4.338
Painting (2023)	10	0.0708	0.708
Totals	**169**		**107.9986**
Time-Weighted Average (lb/day)			**0.6390**

3.2.2 Number of Daily Diesel Trucks

For a similar project, the SCAQMD recommended a total vehicle daily trip rate of 1.68 vehicles per thousand square feet of warehouse space.[10] For the Sierra Avenue and Summit Avenue project, the total heavy-duty vehicle (gasoline plus diesel) trip rate would be 59. The HRA considered three categories of freight trucks: light heavy duty, medium heavy duty, and heavy-heavy duty. **Table 3.2-2** shows their definitions and percentages of the total traffic generated.

7 HARP Users Guide. Appendix K. Risk Assessment Procedures to Evaluate Particulate Emissions from Diesel-Fueled Engines. California Air Resources Board. 2003. https://www.arb.ca.gov/toxics/harp/docs/userguide/appendixK.pdf.
8 Overview: Diesel Exhaust and Health. California Air Resources Board. April 12, 2016. https://www.arb.ca.gov/research/diesel/diesel-health.htm.
9 Air Quality and Greenhouse Gas Emissions Report for the Summit Avenue Warehouse Project, Fontana, California. Prepared by UltraSystems Environmental Inc. for the City of Fontana, California. April 2022.
10 Letter from Jillian Wong, Planning and Rules Manager, South Coast Air Quality Management District, Diamond Bar, CA to Nikki Cavazos, Assistant Planner, City of Rancho Cucamonga, CA re Mitigated Negative Declaration (MND) for the Proposed Hickory Warehouse. January 27, 2017.

Table 3.2-2
DEFINITIONS OF TRUCK CATEGORIES

Category	Axles	EMFAC2014 Class	Fraction of Total Vehicles[a]	No. Trucks per Day
Light	2	LHD1 & LHD2	0.0645	10.0
Medium	3	MHDT	0.0865	13.4
Heavy	4 or more	HHDT	0.23	35.7

[a]Fractions of total vehicles are from Air Quality, Health Risk, and Greenhouse Gas Analysis Report. Santa Ana Avenue and Citrus Avenue Warehouse Project. City of Fontana, San Bernardino County, California. Prepared by First Carbon Solutions, San Bernardino, CA for Seefried Industrial Properties, Inc., Phoenix, AZ. January 6, 2017.

The diesel-fueled percentages of the light-, medium- and heavy-heavy duty trucks were assumed to be 57.8%, 86.7%, and 99.1%, respectively.11 As a result, the total number of diesel trucks traveling to and from the facility was estimated to be 53.

3.2.3 Scheduling

For modeling purposes, it was assumed that each of the 53 trucks per day would arrive on site, go to a loading dock, be unloaded and/or loaded, and depart from the site. The 53 trip cycles were distributed fairly evenly through the day. For each hour of the day the number of trucks in each of the activities was estimated.

3.2.4 Emission Factors

For trucks in motion (traveling on the project site), emission factors (in grams per mile) were obtained from the ARB's EMFAC 2021 Web Database.[12] The onsite vehicle speed was assumed to be 5 miles per hour. Emission factors for each truck class were obtained for 2024 through 2050 and then averaged. **Table 3.2-3** summarizes the emission factor data.

Table 3.2-3
DIESEL TRUCK EMISSION FACTORS

Vehicle Class	Emissions (g/mile)
	Onsite (5 mph)
Light Heavy Duty	0.0347
Medium Heavy Duty	0.0333
Heavy-Heavy Duty	0.0344

Idling emissions for the light-, medium- and heavy-heavy duty trucks were 0.472, 0.018, and 0.004 grams per idle hour, respectively.[13] Trucks were assumed to idle for 15 minutes per hour, so each of these rates was divided by four. Emissions while the trucks are moving were estimated by multiplying the emission factors by vehicle miles traveled on the project site. The emission rates

11 Air Quality, Health Risk, and Greenhouse Gas Analysis Report. Santa Ana Avenue and Citrus Avenue Warehouse Project. City of Fontana, San Bernardino County, California. Prepared by First Carbon Solutions, San Bernardino, CA for Seefried Industrial Properties, Inc., Phoenix, AZ. January 6, 2016.

12 https://arb.ca.gov/emfac/emissions-inventory/7284dfd42dba54cc28110fffd2480fdef0574559. Accessed December 8, 2021.

13 Air Quality, Health Risk, and Greenhouse Gas Analysis Report. Santa Ana Avenue and Citrus Avenue Warehouse Project. City of Fontana, San Bernardino County, California. Prepared by First Carbon Solutions, San Bernardino, CA for Seefried Industrial Properties, Inc., Phoenix, AZ. January 6, 2016.

were converted to the units needed by the dispersion model, which are grams per second per square meter. (See **Section 3.3.1**.)

3.3 Dispersion Modeling

The U.S. Environmental Protection Agency's screening dispersion model SCREEN3[14] was used for the dispersion modeling.

3.3.1 Sources

Construction activities were modeled as one combined volume source whose footprint was the same as the entire project site.[15] Onsite truck activities (onsite travel and idling) were defined as "area sources," the area being the entire site.

3.3.2 Receptor Grid

SCREEN3 was run for pollutant travel only directly west from the project site, since all of the sensitive receptors are in that direction. The model calculated concentrations at every 100 meters from the center of the project site, out to 500 meters. It also calculated them at the site boundary (90 meters from the site center), at the nearest residence (at 139 meters) and at a point that it determined to have the maximum concentration (see below).

3.3.3 Meteorology

The model was set to determine the combination of meteorological variables (wind speed, stability class, mixing height, etc.) that yielded the maximum predicted pollutant concentration.

3.3.4 Adjustment to Annual Emissions

The SCREEN3 model estimates 1-hour average concentrations in air. For the health risk analysis, average annual concentrations are needed. The U.S. Environmental Protection Agency has not published factors for converting hourly average values to annual concentrations for area sources.

14 SCREEN3 Model User's Guide. U.S. Environmental Protection Agency, Office of Aire Quality Planning and Standards, Research Triangle Park, NC. EPA-454/B-95-004. September 1995. https://gaftp.epa.gov/Air/aqmg/SCRAM/models/screening/screen3/screen3d.pdf. Accessed December 8, 2021.

15 Construction activities were also modeled as an area source, but the volume source alternative yielded a more conservative (i.e., higher) exposure estimate.

However, several state and regional agencies have recommended such factors,[16,17,18,19] which range from 0.05 to 0.1. For a maximum case, we used 0.1.

3.4 Risk Calculations

Health risk assessments for DPM usually address cancer and chronic noncancer risk. Acute (short-term exposure) risk for DPM is not assessed because health risk data for acute exposure are lacking. For the proposed project, chronic noncancer risk was not assessed because it is generally much lower than its CEQA threshold than is the cancer risk from its threshold.[20]

Cancer risk was calculated from the following formula:[21]

$$CR_{DPM} = C_{DPM} * URF_{DPM} * LEA$$

where:

CR_{DPM} = Cancer risk from diesel particulate matter; the probability of an individual developing cancer as a result of exposure to DPM.

C_{DPM} = Annual average DPM concentration in micrograms per cubic meter

URF_{DPM} = Unit risk factor for DPM; estimated probability that a person will contract cancer as a result of inhalation of a DPM concentration of 1 microgram per cubic meter continuously over a period of 70 years

LEA = Lifetime exposure adjustment

The unit risk factor for DPM is 3.0×10^{-4} per microgram per cubic meter, according to the Office of Environmental Health Hazard Assessment.[22] For operational exposure, LEA = 1. The LEA for construction exposure was calculated by dividing the number of days of construction activity (169) by the number of days in 70 years (25,550).

16 South Carolina Modeling Guidelines for Air Quality Permits. Department of Health and Environmental Control. Revised April 15, 2019. https://scdhec.gov/sites/default/files/media/document/BAQ_SC%20Modeling%20Guidelines_10.15.18_revised%204.15.19.pdf. Accessed December 8, 2021.

17 Oil and Gas Standard Permit and Permit by Rule Refined-Screening Modeling Guidelines. Texas Commission on Environmental Quality. https://www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/og-mod-pro.pdf. Accessed December 8, 2021.

18 Recommended Methods for Screening and Modeling Local Risks and Hazards. Bay Area Air Quality Management District, San Francisco, CA, Version 3.0, May 2012. https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Risk%20Modeling%20Approach%20May%202012.ashx?la=en. Accessed December 8, 2021.

19 Risk Assessment Procedures for Rules 1401 and 212, Version 7.0. South Coast Air Quality Management District, Diamond Bar, CA. July 1, 2005. http://www.aqmd.gov/docs/default-source/planning/risk-assessment/risk-assessment-procedures-v-7.pdf?sfvrsn=4. Accessed December 8, 2021.

20 The relative importance of DPM cancer risk and chronic noncancer risk is discussed in HARP Users Guide. Appendix K. Risk Assessment Procedures to Evaluate Particulate Emissions from Diesel-Fueled Engines. California Air Resources Board. 2003. https://www.arb.ca.gov/toxics/harp/docs/userguide/appendixK.pdf.

20 Overview: Diesel Exhaust and Health. California Air Resources Board. April 12, 2016. https://www.arb.ca.gov/research/diesel/diesel-health.htm.

21 Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Idling Emissions for CEQA Air Quality Analysis. South Coast Air Quality Management District, Diamond Bar, CA. August 2003, pp 8-9.

22 Appendix A: Hot Spots Unit Risk and Cancer Potency Values. Office of Environmental Health Hazard Assessment. Updated May 2019. https://oehha.ca.gov/media/CPFs042909.pdf. Accessed December 8, 2021.

4.0 RESULTS AND DISCUSSION

SCREEN3 modeling results are provided in **Attachment 2**.

4.1 Exposures

During construction, the maximum annual average DPM concentration would be 0.272 µg/m^3, at 100 meters from the center of the project site; this would be in the northbound roadway of Sierra Avenue. The maximum concentration at a sensitive receptor would be 0.196 µg/m^3, in the residential neighborhood on the west side of Sierra Avenue.

During project operations, the maximum annual average DPM concentration would be 0.24 micrograms per cubic meter (µg/m^3), at 120 meters from the center of the project site. This location is in the roadway of Sierra Avenue. The maximum residential exposure would be at the nearest house on the west side of Sierra Avenue; it would be 0.023 µg/m^3.

4.2 Risk Results

Table 4.2-1 summarizes the results of the modeling and risk calculation. The maximum residential exposure is below the SCAQMD's threshold. A more sophisticated analysis, using actual meteorology for the area, would yield lower cancer risk estimates.

Table 4.2-1
MAXIMUM INDIVIDUAL CANCER RISK RESULTS

Project Phase	Maximum Individual Cancer Risk (per million)	SCAQMD CEQA Significance Threshold (per million)
Construction	0.39	10
Operations	6.9	10

As was noted previously, this analysis did not include chronic noncancer risk, since that type of risk relative to its CEQA threshold would be even lower than the cancer risk is to the 10-in-one-million threshold. Also, risk to workers in the surrounding area was not included because occupational lifetime exposures would be less than those of the residential area,[23] and the latter are already below the CEQA threshold.

Attachments

23 Residents are assumed to be exposed 24 hours per day, 365 days per year, for 70 years. Worker exposure would occur only during their time at their workplaces.

ATTACHMENTS

ATTACHMENT 1

ESTIMATION OF DAILY TRUCK TRIPS

TRAFFIC GENERATION ESTIMATE

SCAQMD Recommended Generation Rates		1.68	ADT/1000 sf (all vehicles)
		0.64	ADT/1000 sf (trucks only)
Project warehouse area (1000 sf) =	92.38		
Total trips generated	155.1984		

Fractions of All Vehicles

LHD2 (2-axle)	0.0645
MHD (3-axle)	0.0865
HHD (4^+axle)	0.23
Cars & lt trucks	0.619

Trips Generated

		PCE Factor	PCE	Diesel Fraction	# Diesel	
LHD2 (2-axle)	10.0103	1.5	15.01545	0.578	5.785952	**6**
MHD (3-axle)	13.42466	2	26.84932	0.867	11.63918	**12**
HHD (4^+axle)	35.69563	3	107.0869	0.991	35.37437	**35**
Cars & lt trucks	96.06781	1	96.06781			
					52.7995	**53**
	155.1984		**245.0195**			

Trucks/day **59.13059**

ATTACHMENT 2

SCREEN3 MODEL INPUTS AND RESULTS

12/07/21
20:05:08

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 ***  SCREEN3 MODEL RUN  ***
 *** VERSION DATED 13043 ***

7102_Allard Warehouse (2021-12-07)a

SIMPLE TERRAIN INPUTS:
   SOURCE TYPE                =         AREA
   EMISSION RATE (G/(S-M**2))  =     0.265200E-08
   SOURCE HEIGHT (M)          =       4.5700
   LENGTH OF LARGER SIDE (M)   =     180.0000
   LENGTH OF SMALLER SIDE (M)  =      99.0000
   RECEPTOR HEIGHT (M)        =       0.0000
   URBAN/RURAL OPTION         =        URBAN
THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

   ANGLE RELATIVE TO LONG AXIS =       0.0000


BUOY. FLUX =    0.000 M**4/S**3;  MOM. FLUX =    0.000 M**4/S**2.

*** FULL METEOROLOGY ***

**********************************
*** SCREEN AUTOMATED DISTANCES ***
**********************************

*** TERRAIN HEIGHT OF    0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

  DIST     CONC             U10M   USTK  MIX HT   PLUME  MAX DIR
   (M)   (UG/M**3)   STAB  (M/S)  (M/S)    (M)   HT (M)   (DEG)
-------  ----------  ----  -----  -----  ------  ------  -------
    90.   0.3357E-01    5     1.0    1.0 10000.0    4.57      0.
   100.   0.3516E-01    5     1.0    1.0 10000.0    4.57      0.
   200.   0.2629E-01    5     1.0    1.0 10000.0    4.57      0.
   300.   0.1700E-01    5     1.0    1.0 10000.0    4.57      0.
   400.   0.1173E-01    5     1.0    1.0 10000.0    4.57      0.
   500.   0.8556E-02    5     1.0    1.0 10000.0    4.57      0.

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND    90. M:
   120.   0.3719E-01    5     1.0    1.0 10000.0    4.57      0.

**********************************
*** SCREEN DISCRETE DISTANCES ***
**********************************

*** TERRAIN HEIGHT OF    0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
```

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	MAX DIR (DEG)
139.	0.3546E-01	5	1.0	1.0	10000.0	4.57	0.

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	0.3719E-01	120.	0.

****
** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **
****

04/14/22
16:06:55

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 ***  SCREEN3 MODEL RUN  ***
 *** VERSION DATED 13043 ***

7106 ALLARD SUMMIT WAREHOUSE CONSTRUCTION

SIMPLE TERRAIN INPUTS:
   SOURCE TYPE               =       VOLUME
   EMISSION RATE (G/S)       =     0.144700E-01
   SOURCE HEIGHT (M)         =       7.5000
   INIT. LATERAL DIMEN (M)   =      31.2500
   INIT. VERTICAL DIMEN (M)  =       6.9800
   RECEPTOR HEIGHT (M)       =       0.0000
   URBAN/RURAL OPTION        =        URBAN

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.


BUOY. FLUX =    0.000 M**4/S**3;  MOM. FLUX =    0.000 M**4/S**2.

*** FULL METEOROLOGY ***

**********************************
*** SCREEN AUTOMATED DISTANCES ***
**********************************

*** TERRAIN HEIGHT OF    0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

  DIST     CONC              U10M   USTK  MIX HT   PLUME   SIGMA   SIGMA
   (M)   (UG/M**3)   STAB  (M/S)  (M/S)    (M)   HT (M)   Y (M)   Z (M)  DWASH
-------  ----------  ----  -----  -----  ------  ------  ------  ------  -----
   100.    7.107        5     1.0    1.0 10000.0    7.50   40.92   13.61    NO
   200.    4.355        5     1.0    1.0 10000.0    7.50   50.27   19.54    NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND   100. M:
   100.    7.107        5     1.0    1.0 10000.0    7.50   40.92   13.61    NO

 DWASH=   MEANS NO CALC MADE (CONC = 0.0)
 DWASH=NO MEANS NO BUILDING DOWNWASH USED
 DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
 DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
 DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

**********************************
*** SCREEN DISCRETE DISTANCES ***
**********************************

*** TERRAIN HEIGHT OF    0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***
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DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
140.	5.755	5	1.0	1.0	10000.0	7.50	44.70	16.05	NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

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*** SUMMARY OF SCREEN MODEL RESULTS ***
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CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	7.107	100.	0.

****
** REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS **
****