California Environmental Protection Agency

Air Resources Board

Health Risk Assessment for the BNSF Railway Watson Railyard

Stationary Source Division
November 2, 2007

California Environmental Protection Agency

Air Resources Board

Health Risk Assessment for the BNSF Railway Watson Railyard

Principal Author
Wei Li, Ph.D.

Contributing Authors
Stationary Source Division:
Jing Yuan, Ph.D.
Eugene Yang, Ph.D., P.E.
Hector Castaneda

Planning and Technical Support Division:
Nicole Dolney
Beth Schwehr
Anthony Servin, P.E.
Stephen Zelinka
Johnnie Raymond

Reviewed by

ARB Executive Office:
Michael H. Scheible, Deputy Executive Officer

ARB Stationary Source Division:
Robert D. Fletcher, Chief, Stationary Source Division
Dean C. Simeroth, Chief, Criteria Pollutants Branch
Harold Holmes, Manager, Engineering Evaluation Section

This page intentionally left blank

Acknowledgements

Air Resources Board staff extends its appreciation to the representatives of BNSF Railway and their consultants for preparing the railyard emissions inventory data and conducting air dispersion model simulations.

BNSF Railway:
Mark Stehly, Michael Stanfill

Environ International, Inc.:
Dave Souten, Dr. Douglas Daugherty, Dr. Christian Lindhjem, Dr. Robert Scofield

This page intentionally left blank

Table of Contents

LIST OF TABLES

LIST OF FIGURES

APPENDICES

A. Methodology for Estimating Off-Site Mobile Source Diesel PM Emissions

B. Methodology for Estimating Off-Site Stationary Source Diesel PM Emissions

C. Methodology for the Air Dispersion Modeling of Off-Site Diesel PM Emissions

D. Table of Locomotive Diesel PM Emission Factors

E. Methodology for estimating Diesel PM Emissions from the HHD Trucks Traveling between the Intermodal Railyards and Major Freeways

F. Spatial Allocations of Diesel PM Emissions at BNSF Watson Railyard

G. AERMOD Model Sensitivity Analysis of Meteorological Data (one- VS. Five-Year Data)

I. INTRODUCTION

The California Air Resources Board (ARB or Board) conducted a health risk assessment study to evaluate the health impacts associated with toxic air contaminants emitted in and around the BNSF Railway's Watson Railyard located in Wilmington, California. The study focused on the railyard property emissions from locomotives, on-road fleet vehicles, and off-road vehicles and equipment. Also evaluated were mobile and stationary sources with significant emissions within a one mile distance from the railyard. This information was used to evaluate the potential health risks associated with diesel PM emissions to those living nearby the railyard.

A. Why is ARB concerned about diesel PM emissions?

In 1998, ARB identified particulate matter from diesel exhaust (diesel PM) as a toxic air contaminant based on its potential to cause cancer and other adverse health problems, including respiratory illnesses, and increased risk of heart disease. Population-based studies in numerous cities in the U.S. and around the world demonstrate a strong link between elevated particulate matter levels and premature deaths[*] (Pope et al., 1995, 2002 and 2004; Krewski et al., 2000), increased hospitalizations for respiratory and cardiovascular causes, asthma and other lower respiratory symptoms, acute bronchitis, work loss days, and minor restricted activity days. Many of these studies have linked the health effects to diesel PM either separately or as a component of ambient air (ARB, 2006a). Subsequent research has shown that diesel PM contributes to premature death. Diesel particles are very small. Approximately 94 percent of the mass of these particles are less than 2.5 microns in diameter ($PM_{2.5}$). Because of their tiny size, diesel PM is readily respirable and can penetrate deep into the lung and enter the bloodstream, carrying with them an array of toxins. Therefore, exposure to diesel PM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems.

Diesel PM emissions typically are the dominant toxic air contaminant in and around a railyard facility. Diesel PM typically accounts for about 70% of the states' estimated potential ambient air toxic cancer risks. This estimate is based on data from ARB's ambient monitoring network in 2000 (ARB, 2000). These findings were consistent with that of the study conducted by South Coast Air Quality Management District: Multiple Air Toxics Exposure Study in the South Coast Air Basin (SCAQMD, 2000). Based on these scientific research findings, the health impacts in this study primarily focus on the risks from the diesel PM emissions.

B. Why evaluate diesel PM emissions at the BNSF Watson Railyard?

In 2005, the ARB entered into a statewide railroad pollution reduction agreement (Agreement) with BNSF Railway Company (BNSF) and Union Pacific Railroad Company (UP) (ARB, 2005). This Agreement was developed to implement near term

[*] Premature Death: as defined by U.S. Center for Disease Control and Prevention's Years of Potential Life Lost, any life ended before age 75 is considered as premature death.

measures to reduce diesel PM emissions in and around California railyards by approximately 20 percent.

The Agreement requires that health risk assessments be prepared for each of the 17 major or designated railyards in the State. The Agreement requires the railyard HRAs to be prepared based on ARB's experience in preparing the UP Roseville Railyard HRA study in 2004, and the ARB Health Risk Assessment Guidance for Railyard and Intermodal Facilities that the ARB staff developed in 2006 (see http://www.arb.ca.gov/railyard/hra/hra.htm) (ARB, 2006b). The BNSF Watson Railyard is one of the designated railyards subject to the Agreement and the HRA requirements.

C. What are Health Risk Assessments?

A health risk assessment (HRA) uses mathematical models to evaluate the health impacts from exposure to certain chemical or toxic air contaminants released from a facility or found in the air. HRAs provide information to estimate potential long term cancer and non-cancer health risks. HRAs do not gather information or health data on specific individuals, but are estimates for the potential health impacts on a population at large.

An HRA consists of three major components: the air pollution emission inventory, the air dispersion modeling, and an assessment of associated health risks. The air pollution emission inventory provides an understanding of how the air toxics are generated and emitted. The air dispersion modeling takes the emission inventory and meteorology data such as temperature and wind speed/direction as its inputs, then uses a computer model to predict the distributions of air toxics in the air. Based on this information, an assessment of the potential health risks of the air toxics to an exposed population is performed. The results are expressed in a number of ways as summarized below.

- For potential cancer health effects, the risk is usually expressed as the number of chances in a population of a million people. The number may be stated as "10 in a million" or "10 chances per million". The methodology used to estimate the potential cancer risks is consistent with the Tier-1 analysis of *Air Toxics Hot Spots Program Risk Assessment Guidelines* (OEHHA, 2003). A Tier-1 analysis assumes that an individual is exposed to an annual average concentration of a given pollutant continuously for 70 years. The length of time that an individual is exposed to a given air concentration is proportional to the risk. Children, however, are impacted more during the childhood period. Exposure duration of 30 years or 9 years may also be evaluated as supplemental information to present the range of cancer risk based on residency period.

- For non-cancer health effects, a reference exposure level (REL)[†] is used to predict if there will be certain identified adverse health effects, such as lung irritation, liver damage, or birth defects. These adverse health effects may happen after chronic (long-term) or acute (short-term) exposure. To calculate a non-cancer health risk number, the reference exposure level is compared to the concentration that a person is exposed to and a "hazard index" (HI) is calculated. Typically, the greater the hazard index is above 1.0, the greater the potential for possible adverse health effects. If the hazard index is less than 1.0, then it is an indicator that adverse effects are less likely to happen.

- For premature deaths linked to diesel PM emissions in the South Coast Air Basin, ARB staff estimated about 1,300 premature deaths per year due to diesel exhaust exposure in 2000 (ARB Research Division, and Lloyd and Cackette, 2001). The total diesel PM emission from all sources in the South Coast Air Basin is about 7,750 tons per year in 2005 (ARB, 2006c). Diesel PM emissions in 2005 from the BNSF Watson Railyard are estimated at about 1.9 tons per year, which is about 0.02% of total air basin emissions. For comparison with another major source of diesel PM emissions in the South Coast Air Basin, the combined diesel PM emissions from the Port of Los Angeles/Port of Long Beach were estimated to be about 1,760 tons per year, which resulted in an estimated 29 premature deaths per year (ARB, 2006d).

The potential cancer risk from a given carcinogen estimated from the health risk assessment is expressed as the incremental number of potential cancer cases that could be developed per million people, assuming population is exposed to the carcinogen at a constant annual average concentration over a presumed 70-year lifetime. For example, if the cancer risk were estimated to be 100 chances per million, the probability of an individual developing cancer would be expected to not exceed 100 chances in a million. If a population (e.g., one million people) were exposed to the same potential cancer risk (e.g., 100 chances per million), then statistics would predict that no more than 100 of those million people exposed are likely to develop cancer from a lifetime of exposure (i.e., 70 years) due to diesel PM emissions from a facility.

HRA is a complex process that is based on current knowledge and a number of assumptions. However, there is a certain extent 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 the assessments are often designed to be conservative on the side of health protection in order to avoid

[†] The Reference Exposure Level (REL) for diesel PM is essentially the U.S. EPA Reference Concentration first developed in the early 1990s based on histological changes in the lungs of rats. Since the identification of diesel PM as a Toxic Air Contaminant (TAC), California has evaluated the latest literature on particulate matter health effects to set the Ambient Air Quality Standard. Diesel PM is a component of particulate matter. Health effects from particulate matter in humans include illness and death from cardiovascular and respiratory disease, and exacerbation of asthma and other respiratory illnesses. Additionally, a body of literature has been published, largely after the identification of diesel PM as a TAC and adoption of the REL, which shows that diesel PM can enhance allergic responses in humans and animals. Thus, it should be noted that the REL does not reflect adverse impacts of particulate matter on cardiovascular and respiratory disease and deaths, exacerbation of asthma, and enhancement of allergic response.

underestimation of risk to the public. . As indicated by the OEHHA Guidelines, the Tier-1 evaluation is useful in comparing risks among a number of facilities and similar sources. Thus, the risk estimates should not be interpreted as a literal prediction of disease incidence in the affected communities but more as a tool for comparison of the relative risk between one facility and another. In addition, HRA results are best used to compare potential risks to target levels to determine the level of mitigation needed. They are also an effective tool for determining the impact a particular control strategy will have on reducing risks.

OEHHA is in the process of updating the current health risk assessment guidelines, and the ARB and UP and BNSF agreed to evaluate the non-cancer health impacts using an interim methodology. This was used in the Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach (ARB, 2005) to estimate PM mortality. This will serve as a short-term and interim effort until OEHHA can complete its update of the Guidelines.

As soon as the HRA's are final, both the ARB and Railroads in cooperation with the SCAQMD staff, local citizens and others will begin a series of meetings to identify and implement measures to reduce emissions from railyard sources. Existing effects are detailed in Chapter III-C.

D. Who prepared the BNSF Watson Railyard HRA?

Under the Agreement, ARB worked with the affected local air quality management districts, communities, cities, counties, and the two railroads to develop two guideline documents for performing the health risk assessments. The two documents, entitled *ARB Rail Yard Emissions Inventory Methodology* (ARB, 2006e), and *ARB Health Risk Assessment Guidance for Railyard and Intermodal Facilities* (ARB, 2006b), provide guidelines for the identification, modeling, and evaluation of the toxic air contaminants from Designated Railyards throughout California.

Using the guidelines, the railroads and their designated consultants (i.e., ENVIRON International for the BNSF Watson Railyard) developed the emission inventories and performed the air dispersion modeling for operations that occurred within each of the designated railyards. The base year of the analysis was 2005.

ARB staff was responsible for reviewing and approving the railroads' submittals, identifying significant sources of emissions near the railyards and modeling the impacts of those sources, and preparing the railyard health risk assessments. ARB staff was also responsible for releasing the HRAs to the public for comment and presenting them at community meetings. After reviewing public comment on the draft HRAs, ARB staff made revisions as necessary and appropriate, and is now presenting the HRAs in final form. Ultimately, the information derived from the railyards HRAs are to be used to help identify the most effective mitigation measures that could be implemented to further reduce railyard emissions and public health risks.

E. How is this report Structured?

The next chapter provides a summary of the BNSF Watson Railyard operations, emissions, air dispersion modeling, and health risk assessment results. Following the summary, the third chapter presents the details of the BNSF Watson Railyard emission inventories. After that, the fourth chapter explains how the air dispersion modeling was conducted, and the fifth chapter provides the detailed health risk assessment for the BNSF Watson Railyard. The appendices present the technical supporting documents for the analyses discussed in the main body of the report.

II. SUMMARY

Below is a summary of the BNSF Watson Railyard operations, emissions, air dispersion modeling, and health risk assessment findings.

A. General description of the BNSF Watson Railyard and the surrounding areas

The BNSF Watson Railyard is located at 1302 Lomita Boulevard in Wilmington, California. The railyard is approximately 4 miles northwest of downtown Long Beach and 16 miles south of downtown Los Angeles. It is located in a predominantly commercial and manufacturing area, with several residential areas bordering or within one mile to the west, south, and east/southeast of the railyard, as shown in Figure II-1. The railyard is bordered by East Lomita Boulevard to the north, residential, commercial, and/or manufacturing properties to the east, East L Street to the south, and residential, commercial, and/or manufacturing properties to the west. The southern end of the railyard is bisected by the Pacific Coast Highway. This railyard is also located within three miles of three other major roadways, including I-405 to the north, I-710 to the east, and I-110 to the west. The Ports of Los Angeles and Long Beach are located approximately three miles to the south/southeast of the BNSF Watson Railyard.

B. What are the primary facility operations at the BNSF Watson Railyard?

The major operations at BNSF Watson Railyard are trains arriving and departing from the railyard. A significant part of the arrival and departure of line haul locomotives at the BNSF Watson is due to unit trains transporting ethanol from the Midwest to Southern California. These trains can serve up to 80% (about 340 million gallons per year) of Southern California's demand for fuel blend ethanol. Locomotive switching and refueling are also conducted at the railyard. Other emission related activities include the operations of off-road equipment and on-road fleet vehicles.

Figure II-1: The BNSF Watson Railyard and Surrounding Areas

C. What are the diesel PM emissions at and near the BNSF Watson Railyard?

In 2005, diesel PM emissions from the BNSF Watson Railyard and other significant emission sources within a one-mile distance from the railyard boundary (off-site emissions) were estimated at about 6.5 tons per year. Estimated off-site sources and the railyard contribute to 70% and 30% of the total diesel PM emissions, respectively.

To provide a perspective on the railyards diesel PM emissions, Table II-1 lists the estimated diesel PM emissions (for the year of 2005) for eleven railyards whose HRAs are completed or planned to be completed in 2007. The diesel PM emissions from the BNSF Watson Railyard ranks last among these eleven railyards.

Table II-1: Comparison of Diesel PM Emissions from Eleven Railyards (tons per year)

Railyard	Locomotive	Cargo Handling Equipment	On-Road Trucks	Others (Off-Road Equipment, TRUs, Stationary Sources, etc.)	Total§
UP Roseville*	25.1**	N/A‡	N/A‡	N/A‡	**25.1**
BNSF Hobart	5.9	4.2†	10.1	3.7	**23.9**
UP Commerce	4.9	4.8†	2.0	0.4	**12.1**
UP LATC	3.2	2.7†	1.0	0.5	**7.3**
UP Stockton	6.5	N/A‡	0.2	0.2	**6.9**
UP Mira Loma	4.4	N/A‡	0.2	0.2	**4.9**
BNSF Richmond	3.3	0.3	0.5	0.6	**4.7**
BNSF Stockton	3.6	N/A‡	N/A‡	0.02	**3.6**
BNSF Commerce Eastern	0.6	0.4	1.1	1.0	**3.1**
BNSF Sheila	2.2	N/A‡	N/A‡	0.4	**2.7**
BNSF Watson	1.9	N/A‡	<0.01	0.04	**1.9**

* The UP Roseville Health Risk Assessment (ARB, 2004a) was based on 1999-2000 emission estimate, only locomotive diesel PM emissions were reported in that study.

** The actual emissions were estimated at a range of 22.1 to 25.1 tons per year.

‡ Not applicable.

§ Numbers may not add precisely due to rounding.

† An error of cargo handling equipment emissions was found after the modeling was completed. The applicable change in emissions was believed to be de minimis; consequently, the modeling was not re-performed.

1. Railyard

The BNSF Watson Railyard emission sources include, but are not limited to, locomotives, on-road fleet vehicles, and off-road diesel-fueled equipment including transport refrigeration units (TRUs) and track maintenance equipment. The BNSF Watson Railyard emissions were calculated on a source-specific and facility-wide basis for the 2005 baseline year. The future growth in emissions at the BNSF Watson facility is not incorporated in the HRA emission inventory, but will be included as part of the mitigation emission reduction efforts. The methodology used to calculate the diesel PM and other toxic air contaminant (TAC) emissions is based on ARB *Rail Yard Emissions Inventory Methodology* (ARB, 2006e).

Diesel PM emissions from the Watson Railyard and sources operating around the railyard are summarized in Table II-2. Within the railyard, 98% of diesel PM emissions were from locomotive operations, at 1.88 tons per year. The locomotive diesel PM emissions were primarily due to train arrival and departure activities, comprising about 1.39 tons per year. The railyard operations, primarily switch locomotives within the railyard, contributed 0.43 tons per year, and the basic locomotive service accounted for

0.06 tons per year of diesel PM emissions. The remaining 2% of the railyard diesel PM emissions were generated by the operations of diesel-fueled off-road vehicles/equipment and on-road fleet vehicles.

Diesel PM was not the only toxic air contaminant (TAC) emitted in the BNSF Watson Railyard. A relatively small amount of gasoline PM was generated from on-road fleet vehicle, and other TACs were generated from on-road vehicles and off-road track equipment. The gasoline PM emissions were about 0.4 pounds per year and other top non-PM TACs (1,3-butadiene, benzene, formaldehyde, and acetaldehyde) emissions were about 0.05 pounds per year, which are significantly less lower compared to the 1.9 tons per year of the diesel PM emissions in the railyard.

In addition, adjusting these emissions on a cancer potency weighted basis for their toxic potential (see a similar analysis for off-site air toxic contaminants on Table II-3), these non-diesel PM toxic air contaminants have less than 10 thousandth of potential cancer risks as compared to diesel PM (less than 0.0001 vs. 1.9 tons per year). Hence, only diesel PM emissions are presented in the on-site emission analysis.

2. Surrounding Areas

ARB staff evaluated significant mobile and stationary sources of diesel PM emissions surrounding the BNSF Watson Railyard. The Health Risk Assessment study for UP Roseville Railyard (ARB, 2004a) indicated that cancer risk associated with on-site diesel PM emissions is substantially reduced beyond a one-mile distance from the railyard. Therefore, in this BNSF Watson Railyard HRA study, ARB staff analyzed the significant diesel PM emission sources within a one-mile distance from the railyard property boundary, where on-site emissions have significant health impacts.

ARB staff analyzed the significant off-site emission sources based on two categories: mobile and stationary. For the off-site mobile sources, the analysis focused on on-road heavy duty diesel trucks, as these are the primary source of diesel PM from the on-road vehicle fleet. ARB staff estimated mobile emissions based on roadway specific vehicle activity data and allocated them to individual roadway links. All roadway links within a one-mile distance from the BNSF Watson Railyard boundary are included in the analysis. The estimates do not include the diesel PM emissions generated from other modes such as extended idling, starts, and off-road equipment outside the rail yards. Individual sources such as local truck distribution centers and warehouses were not evaluated due to insufficient activity data, but truck traffic related to these facilities is reflected in the roadway link traffic activities. Because the off-site mobile sources have only focused on the on-road diesel emissions, the exclusion of extended idling and off-road equipment may result in an underestimation of off-site mobile sources emissions.

Emissions from off-site stationary source facilities are identified using the California Emission Inventory Development and Reporting System (CEIDARS) database, which contains information reported by the local air districts for stationary sources within their jurisdiction. The CEIDARS facilities whose locations fell within the one-mile distance from the boundary of the BNSF Watson Railyard are selected. Diesel PM emissions are estimated from stationary internal combustion (IC) engines burning diesel fuel, operating at stationary sources reported in CEIDARS.

Within a one-mile distance from the boundary of the BNSF Watson Railyards, 70% (3.2 tons per year) of off-site diesel PM emissions were generated by mobile sources, other 30% (1.35 tons per year) of off-site diesel PM are generated by industrial sources nearby, as indicated by Table II-2. The majority of the off-site mobile source diesel PM emissions are generated from diesel-fueled heavy duty trucks serving the nearby refineries and chemical plants. Diesel-fueled vehicles passing the Pacific Coast Highway and major local streets are also responsible for the off-site mobile source diesel PM emissions. Four significant stationary sources within a one-mile distance from the BNSF Watson Railyard generated about 1.35 tons per year of diesel PM emissions, with 78% contributed by Equilon Enterprise, LLC.

Diesel PM emissions from sources in the BNSF Watson Railyard and the sources within a one-mile distance from the railyard boundary are summarized in Table II-2.

Table II-2: BNSF Watson Railyard and Surrounding Area Diesel PM Emissions

DIESEL PM EMISSION SOURCES	BNSF Watson Railyard		Off-site Emissions	
	Tons per year	Percentage	Tons per year	Percentage
Locomotives	**1.88**	**97%**	**-**	**-**
- Line Haul Locomotives Arrivals/Departures	*1.39*	*72%*		
- Switch Locomotives Conducting Yard Operations	*0.43*	*22%*		
- Basic Service (Locomotive Refueling by Trucks)	*0.06*	*3%*		
Off-Road Vehicles and Equipment	**0.05**	**3%**	**-**	**-**
On-Road Vehicles	**< 0.01**	**< 1%**	**-**	**-**
Off-Site Mobile Sources	**-**	**-**	**3.20**	**70%**
Off-site Stationary Sources	**-**	**-**	**1.35**	**30%**
TOTAL *	**1.92**	**100%**	**4.55**	**100%**

* Numbers may not add precisely due to rounding.

ARB staff also evaluated other toxic air contaminant (TACs) emissions around the BNSF Watson Railyard. There are 16 stationary TAC sources identified within the one-mile distance from the railyard boundary. The total emissions of TACs other than diesel PM emitted from these stationary sources, were estimated at about 171 tons per year. Over 60 TAC species are identified among these emissions, in which over 70% (122 tons per year) are identified as ammonia.

Not all of these TACs are identified as carcinogens. According to ARB's *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (ARB, 2000), diesel PM and top five non-diesel PM TACs (including 1,3-butadiene, benzene, carbon tetrachloride, formaldehyde, and hexavalent chromium) account for 97% of the state's estimated potential cancer risk levels (ARB, 2000). This study also concluded that diesel PM contributes over 70% percent of the state's estimated potential cancer risk levels, which are significantly higher than other TACs (ARB, 2000). Carbon Tetrachloride was not identified within a one-mile distance from the BNSF Watson Railyard boundary, other top four cancer risk contributors other than diesel PM were estimated at about 6.2 tons per year. Up to 90% (5.6 out of 6.2 tons per year) of these top non-diesel-PM TACs were generated by Equilon Enterprise, LLC.

The Office of Environmental Health Hazard Assessment (OEHHA) has estimated an inhalation cancer potency factor (CPF) for individual chemicals and some chemical mixtures such as whole diesel exhaust. Diesel PM contains many individual cancer causing chemicals. The individual cancer causing chemicals from diesel exhaust are not separately evaluated so as to avoid double counting. The four compounds other than diesel PM listed here are given a weighting factor by comparing each compound's CPF to the diesel PM CPF. This factor is multiplied by the estimated emissions for that compound, which gives the cancer potency weighted toxic emissions. As can be seen in Table II-3, the potency weighted toxic emissions for these TACs are about 0.86 tons per year, which is comparable to the off-site diesel PM emissions.

Cancer potency factors (CPF) are expressed as the 95% upper confidence limit of excess cancer cases occurring in an exposed population assuming continuous lifetime exposure to a substance at a dose of one milligram per kilogram of body weight, and are expressed in units of $(mg/kg\text{-}day)^{-1}$.

Table II-3: Potency Weighted Toxic Emissions from Significant Off-Site Stationary Sources Surrounding the BNSF Watson Railyard

Compound	Cancer Potency Factor	Weighting Factor	Estimated Emission (tons/year)	Potency Weighted Toxic Emission (tons/year)
Diesel PM (DPM)	1.1	1	1.35	**1.35**
Hexavalent Chromium	510	464	0.001	**0.46**
1,3-Butadiene	0.6	0.55	0.29	**0.16**
Benzene	0.1	0.09	1.72	**0.16**
Formaldehyde	0.021	0.021	4.18	**0.08**
Total (non-diesel PM)			**6.19**	**0.86**

In addition, ARB staff evaluated the potential cancer risk levels caused by the use of gasoline in the South Coast Air Basin. Table II-4 shows the emissions of four major carcinogen compounds of gasoline exhausts in the South Coast Air Basin in the year of 2005 (ARB, 2006c). As indicated in Table II-4, the potency weighted emissions of these four toxic air contaminants from gasoline sources are estimated at about 816 tons per year, or about 11% of diesel PM emissions in the South Coast Air Basin. If only gasoline-powered vehicles are considered, the potency weighted emissions of these four TACs are estimated at about 438 tons per year, or about 6% of diesel PM emissions in the Basin. Hence, gasoline-powered vehicular sources are not included in the analysis.

Table II-4: Comparison of Major Gasoline-Use Related Toxic Air Contaminants with Diesel PM Emissions in South Coast Air Basin

Compound	TACs Emissions (tons per year)			
	From All Sources	Potency Weighted*	From Gasoline Vehicles	Potency Weighted*
Diesel PM	7,446	**7,446**	-	-
1,3-Butadiene	695	**382**	420	**231**
Benzene	3,606	**325**	2,026	**182**
Formaldehyde	4,623	**92**	1,069	**21**
Acetaldehyde	1,743	**17**	314	**3**
Total (non-diesel PM)	10,668	**817**	3,829	**438**

*: Based on cancer potency weighting factors.

D. What are the potential cancer risks from the BNSF Watson Railyard?

As discussed previously, the ARB developed *Health Risk Assessment Guidance for Railyard and Intermodal Facilities* (ARB, 2006b) to help ensure that the methodologies used in each railyard HRA meet the requirements in the ARB / Railroad Statewide Agreement. The railyard HRA follows *The Air Toxics Hot Spots Program Risk Assessment Guidelines* (OEHHA, 2003) published by the OEHHA, and is consistent with the methodologies used for the UP Roseville Railyard Study (ARB, 2004a).

The United States Environmental Protection Agency (U.S. EPA) recently approved a new state-of-the-art air dispersion model called AERMOD (**A**merican Meteorological Society/**E**PA **R**egulatory Model Improvement Committee **MOD**EL). This model is used in the ARB railyard health risk assessments. One of the critical inputs required for the air dispersion modeling is the meteorology, such as wind direction and wind speed. These parameters determine where and how the pollutants will be transported. Based on the AERMOD meteorological data selection criteria, ten meteorological stations around the BNSF Watson Railyard were evaluated and the data from the most representative meteorology stations, St. Peter and Paul School Station and Long Beach Daugherty Field Station, were selected for the modeling.

*An **isopleth** is a line drawn on a map through all points of equal value of some measurable quantity; in this case, cancer risk.*

The potential cancer risks levels associated with the estimated diesel PM emissions at the BNSF Watson Railyard were displayed by **isopleths**. For this analysis, ARB staff elected to present the cancer risk isopleths focusing on risk levels of 10, 25, 50, and100 in a million. Figure II-2a and Figure II-2b present these isopleths Figure II-2a indicates the potential cancer risk levels of adjacent areas around the railyard, and Figure II-2b shows the risk impacts over regional areas. In each figure, the risk isopleths are overlaid onto a satellite image of the Wilmington area surrounding the BNSF Watson Railyard, to better illustrate the land use (residential, commercial, industrial, or mixed use) of these impacted areas.

The OEHHA Guidelines specify that, for health risk assessments, the cancer risk for the maximum exposure at the point of maximum impact be reported. The point of maximum impact (PMI), which is defined as a location or the receptor point with the highest cancer risk level outside of the railyard boundary, with or without residential exposure, is predicted to be located right next to the east side of the railyard boundary, directly downwind of high emission density areas for the prevailing northwesterly wind, where about 95 percent of facility-wide diesel PM emissions were generated (see the emission allocation in Appendix F). The cancer risk at the PMI is estimated to be about 220 chances in a million. The land use in the vicinity of the point of maximum impact is zoned for industrial use. In the residential zoned area, the potential cancer risk of maximally exposed individual resident (MEIR) or maximum individual cancer risk (MICR) is estimated at about 175 chances in a million. As indicated by Roseville Railyard Study (ARB, 2004a), the location of the PMI may vary depending upon the settings of the model inputs and parameters, such as meteorological data set or emission allocations in the railyard. Therefore, given the estimated emissions, modeling settings, and the assumptions applied to the risk assessment, there are great uncertainties associated with the estimation of the point of maximum impact (PMI) and maximum individual cancer risk (MICR). These indications should not be interpreted as a literal prediction of disease incidence but more as a tool for comparison. In addition, the estimated point of maximum impact and maximum individual cancer risk may not be replicated by air monitoring.

ARB staff also conducted a comparison of cancer risks estimated at the PMI versus MICR, and the differences of facility-wide diesel PM emissions between the UP and BNSF railyards. The ratios of cancer risks at the PMI or MICR to the diesel PM emissions do not suggest that one railroad's facilities have statistically higher cancer risks than the other railroad's or vice versa. Rather, the differences are primarily due to emission spatial distributions from individual operations among railyards.

As shown in Figure II-2b, the cancer risk levels show a sharp gradient of decrease outside of the railyard from a much higher risk level to a level of 10 chances in a million within a one mile distance northeast (mostly industrial) and southwest (mostly residential) of the BNSF Watson Railyard boundary. Because of the characteristics of meteorology, the ambient diesel PM concentrations become more dispersive southeast and northwest of the railyard. The regions with a cancer risk over 10 chances in a million extend up to 2.5 miles southeast and 1.5 miles northwest of the railyard boundary.

Figure II-2a: Estimated Adjacent Area Potential Cancer Risks (Chances per Million) Associated with the Diesel PM Emissions from the BNSF Watson Railyard

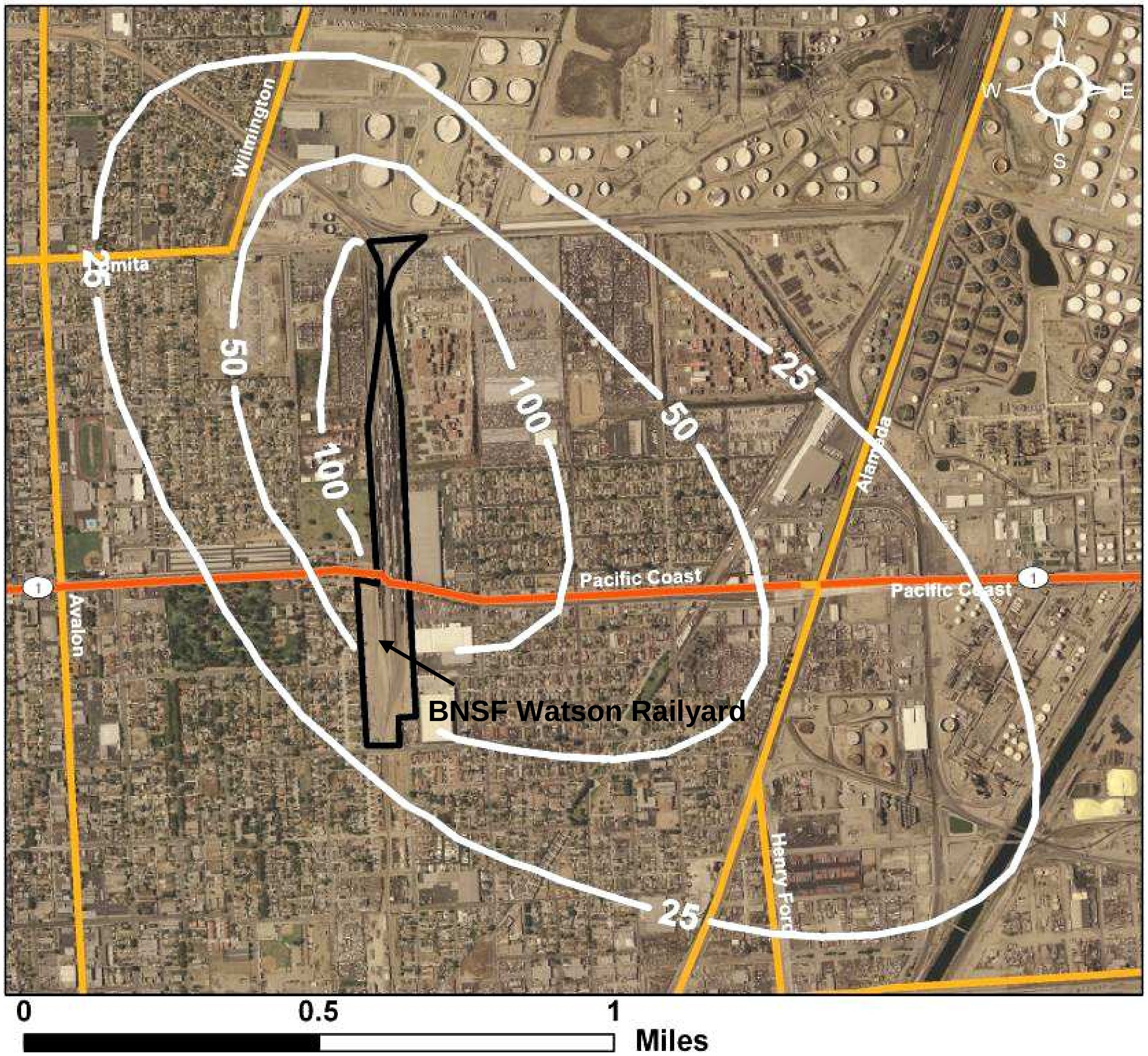


Figure II-2b: Estimated Regional Area Potential Cancer Risks (Chances per Million) Associated with the Diesel PM Emissions from the BNSF Watson Railyard

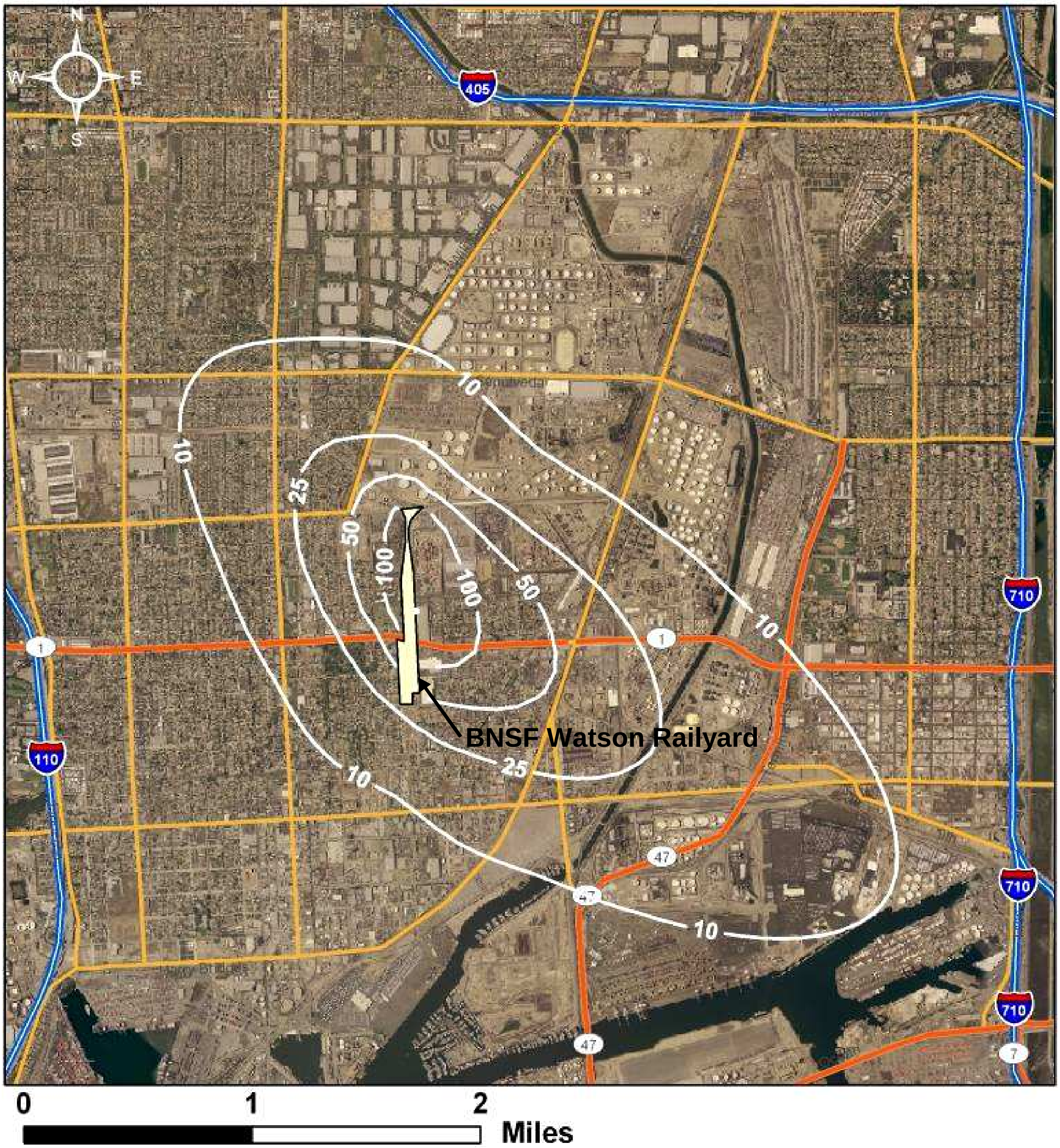
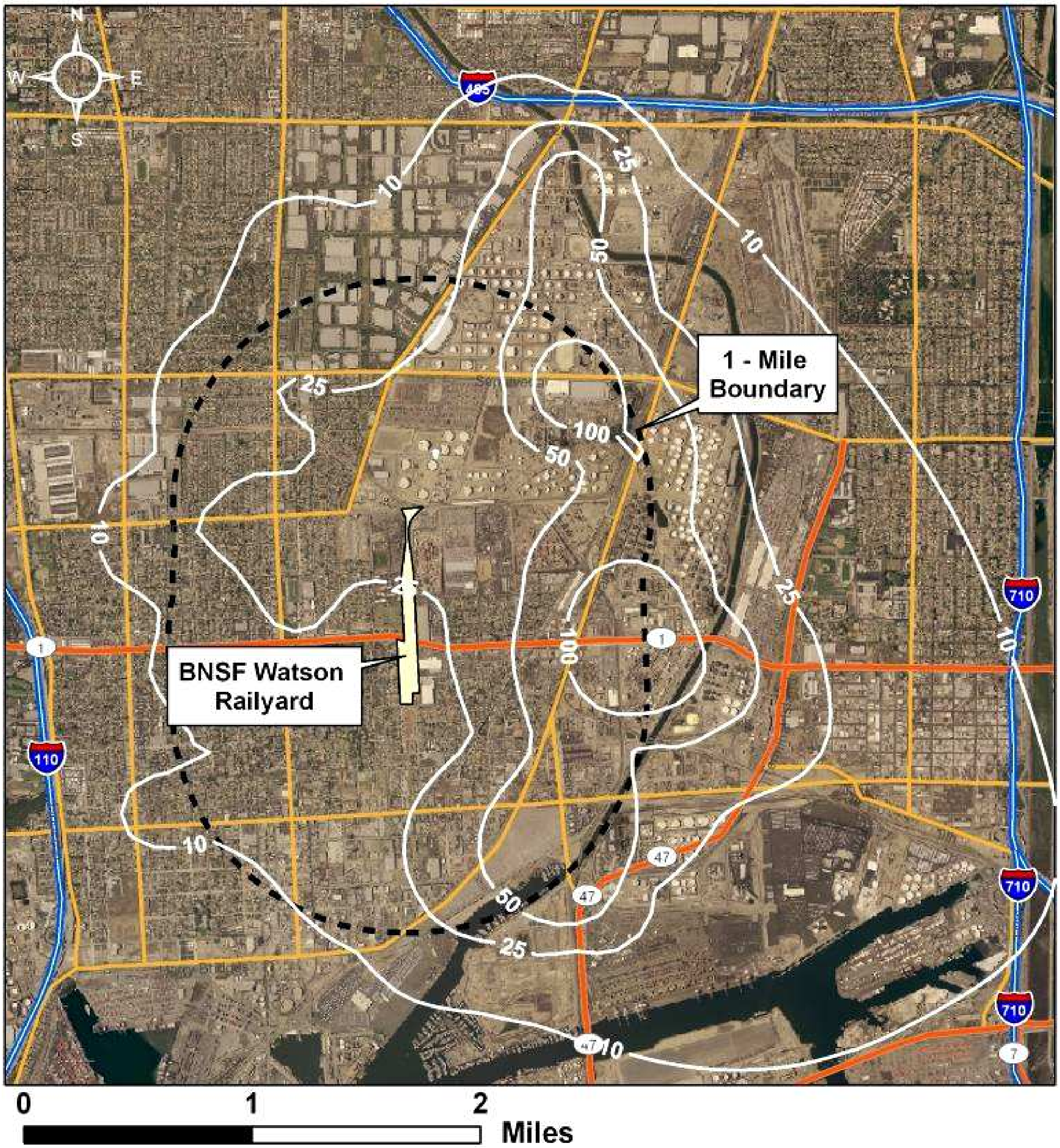


Figure II-3: Estimated Potential cancer risks (chances per million) Associated with the Off-Site diesel PM emissions near the BNSF Watson Railyard



The OEHHA Guidelines recommend a 70-year lifetime exposure duration to evaluate the potential cancer risks for residents. Shorter exposure durations of 30 years and 9 years may also be evaluated for residents and school-age children, respectively, as a supplement. These three exposure durations – 70 years, 30 years, and 9 years – all assume exposure for 24 hours a day, and 7 days a week. It is important to note that children, for physiological as well as behavioral reasons, have higher rates of exposure than adults on a per unit body weight basis (OEHHA, 2003).

To evaluate the potential cancer risks for off-site workers, the OEHHA Guidelines recommend that a 40-year exposure duration be used, assuming workers have a different breathing rate (149 L kg^{-1} day^{-1}) and exposure for an 8-hour workday, five days a week, 245 days a year.

Table II-5 shows the equivalent risk levels of 70- and 30-year exposure durations for exposed residents; and 40- and 9-year exposure durations for off-site workers and school-age children, respectively. As shown in Table II-5, the 10 in a million isopleth line in Figure II-2b would become 4 in a million for exposed population with a shorter residency of 30 years, 2.5 in a million for exposed school-age children, and 2 in a million for off-site workers.

To conservatively communicate the risks, ARB staff presents the estimated cancer risk isopleths all based on 70-year resident exposure duration, even for those impacted industrial areas where no resident lives.

Table II-5: Equivalent Potential Cancer Risk Levels for 70-, 40-, 30- and 9-Year Exposure Durations

Exposure Duration (years)	Equivalent Risk Level (chances in a million)					
70	10	25	50	100	250	500
30	4	11	21	43	107	214
9*	2.5	6.3	12.5	25	63	125
40‡	2	5	10	20	50	100

* Exposure duration for school-aged children.
‡ Exposure duration for off-site workers.

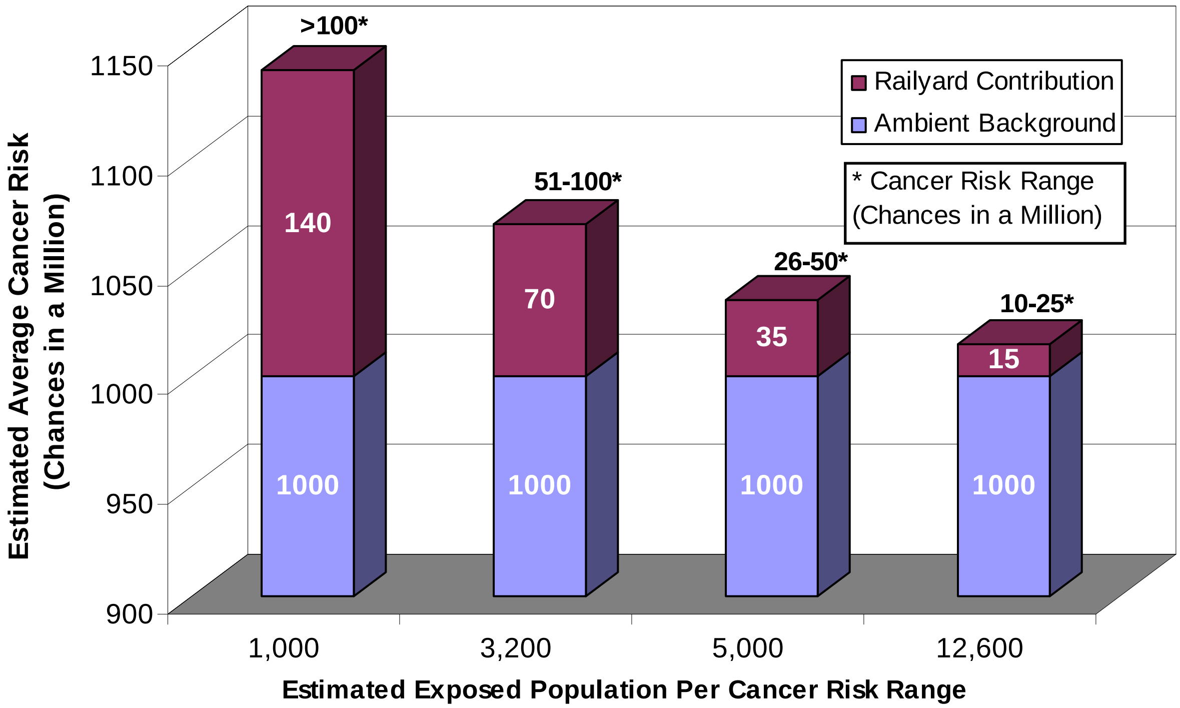
The more populated areas near the BNSF Watson Railyard are located west and east/southeast of the railyard. Table II-6 presents the exposed population and area coverage size for various impacted zones of cancer risks. As indicated by Table II-6, the area with the greatest impacts has an estimated potential cancer risk of over 100 chances in a million, occurring at an area of about 110 acres right next to the railyard boundary, where about 1,000 residents live based on the 2000 U.S. Census Bureau's data. The impacted areas around the railyard boundary with an estimated cancer risk of over 10 chances per million are approximately 3,000 acres, with residents of about 21,000.

Table II-6: Impacted Area and Exposed population Estimated for the Diesel PM Emissions from the BNSF Watson Railyard

Estimated Cancer Risk (chances per million)	Impacted Area (acres)	Population Exposed
10 - 25	2,110	12,600
26 - 50	560	5,000
51 - 100	240	3,200
> 100	110	1,000

It is important to understand that these risk levels represent the predicted risks (due to the BNSF Watson Railyard diesel PM emissions) above the existing background risk levels. Although emissions from the railyard also contribute to the regional background, the measurable effect is small. For the broader South Coast Air Basin, the estimated regional background risk level is estimated to be about 1,000 in a million caused by all toxic air pollutants in the year of 2000 (ARB, 2006a). Figure II-4 provides a comparison of the predicted average potential cancer risks in various isopleths to the regional background risk level and estimated exposed population. For example, in the risk range greater than 100 in a million, the average potential cancer risk above the regional background is 140 in a million. Therefore, residents living in that area would have a potential cancer risk at about 1140 chances in a million.

Figure II-4: Comparison of Estimated Potential Cancer Risks from the BNSF Watson Railyard to the Regional Background Risk Levels



E. What are the estimated non-cancer chronic risks from the BNSF Watson Railyard?

The potential non-cancer chronic health hazard indexes (HI) for diesel PM emissions at the BNSF Watson Railyard are estimated at a range from 0.01 to 0.1. According to the OEHHA Health Risk Assessment Guidelines, these levels indicate that the potential non-cancer chronic public health risks are less likely to happen.

Due to the uncertainties in the toxicological and epidemiological studies, diesel PM as a whole was not assigned a short-term acute REL. It is only the specific compounds of diesel exhaust (e.g., acrolein) that independently have potential acute effects (such as irritation of the eyes and respiratory tract), and an assigned acute REL. However, acrolein is a chemically reactive and unstable compound, and easily reacts with a variety of chemical compounds in the atmosphere. Compared to the other compounds in the diesel exhaust, the concentration of acrolein has a much lower chance of reaching a distant off-site receptor. More importantly, given the multitude of activities ongoing at facilities as complex as railyards, there is a much higher level of uncertainty associated with maximum hourly-specific emission data, which is essential to assess acute risk. Therefore, non-cancer acute risk is not addressed quantitatively in this study. From a risk management perspective, ARB staff believes it is reasonable to focus on diesel PM cancer risk because it is the predominant risk driver and the most effective parameter to evaluate risk reduction actions. Further, actions to reduce diesel PM will also reduce non-cancer risks.

F. What are the estimated health risks from off-site diesel PM emissions?

The ARB staff evaluated the health impacts from off-site diesel PM emissions within a one-mile distance from the BNSF Watson Railyard boundary. The estimated potential cancer risk levels associated with off-site diesel PM emissions are presented in Figure II-3. Table II-7 presents the exposed population and area coverage size for various impacted zones of cancer risks associated with off-site diesel PM emissions.

Similar to the railyard diesel PM emission dispersion pattern, the meteorological conditions resulted in a more dispersive pattern for the off-site diesel PM emissions southeast and northwest of the BNSF Watson Railyard boundary. The areas with cancer risk levels higher than 50 chances per million associated with off-site diesel PM emissions are within a half mile distance from the center of significant off-site diesel emission sources, encompassing approximately 1,300 acres. The land uses of these areas are mostly identified as industrial use, with about 1,400 residents living in these areas based on the 2000 U.S. Census Bureau's data. For comparison with the BNSF Watson Railyard health risks, the same level of potential cancer risks (above 50 chances in a million) associated with railyard diesel PM emissions covers about 350 acres with a population of approximately 4,200. The off-site diesel PM emission impacted residential areas near the BNSF Watson Railyard mostly have a cancer risk level between 10 to 25 chances per million. Total impacted area associated with off-site diesel PM emissions at these levels (10-25 cases in a million) is more than twice larger than that associated with diesel PM emissions from the BNSF Watson Railyard.

Table II-7: Impacted Areas and Exposed Population Estimated for the Off-Site Diesel PM Emissions around the BNSF Watson Railyard

Estimated Cancer Risk (chances per million)	Impacted Area (acres)	Estimated Population Exposed
10 - 25	4,800	42,000
26 - 50	2,000	12,000
51 - 100	1,000	1,400
> 100	300	30

The potential non-cancer chronic health hazard indexes associated with off-site diesel PM emissions within a one-mile distance from the BNSF Watson Railyard boundary are estimated at a range from 0.01 to 0.1. According to the OEHHA Health Risk Assessment Guidelines, these levels indicate that the potential non-cancer chronic public health risks are less likely to happen.

G. Can study estimates be verified by air monitoring?

Currently, there is no approved specific measurement technique for directly monitoring diesel PM emissions in the ambient air. This does not preclude the use of an ambient monitoring program to measure general air quality trends in a region. Since cancer risk is based on an annual average concentration, a minimum of a year of monitoring data would generally be needed.

H. What activities are underway to reduce diesel particulate matter emissions and public health risks?

The ARB has developed an integrated approach to reduce statewide locomotive and railyard emissions through a combination of voluntary agreements, ARB and U.S. EPA regulations, incentive funding programs, and early replacement of California's line haul and yard locomotive fleets. California's key locomotive and railyard air pollution control measures and strategies are summarized below:

South Coast Locomotive NOx Fleet Average Agreement (1998): Signed in 1998 between ARB and both Union Pacific Railroad (UP) and BNSF Railway (BNSF), it requires the locomotive fleets that operate in the South Coast Air Quality Management District (SCAQMD) to meet, on average, U.S. EPA's Tier 2 locomotive emissions standards by 2010. This measure will provide an estimated 65% reduction in oxides of nitrogen (NOx) and 50% reduction in locomotive particulate matter emissions in the South Coast Air Basin (SCAB) by 2010.

Statewide Railroad Agreement (2005): ARB and both UP and BNSF signed a voluntary statewide agreement in 2005. When fully implemented, the Agreement is expected to achieve a 20 percent reduction in locomotive diesel PM emissions in and around railyards through a required number of short-term and long-term measures. As of January 1, 2007, ARB staff estimated that the Agreement has reduced diesel PM emissions by 15% in and around the railyard.

ARB Diesel Fuel Regulations Extended to Intrastate Locomotives (2007): This regulation, approved in 2004, requires intrastate locomotives to use only California ultra low sulfur (15 parts per million) and aromatics diesel fuel. CARB diesel fuel can reduce intrastate locomotive diesel PM and NOx emissions by 14% and 6%, on average, respectively. ARB staff estimates there are over 250 intrastate locomotives currently operating in South Coast Air Basin, and CARB diesel will reduce these locomotive emissions by up to 30 tons per year for diesel PM and 300 tons per year for NO_x. The regulation took effect statewide for intrastate locomotives on January 1, 2007.

ARB Cargo Handling Equipment Regulations (2007): This regulation, approved in 2005, requires the control of emissions from more than 4,000 pieces of mobile cargo handling equipment statewide. Implementation of this regulation will reduce diesel PM emissions by approximately 40% in 2010 and 65% in 2015, and NO_x emissions by approximately 25% in 2010 and 50% in 2015. The regulation, when fully implemented, is expected to cumulatively reduce diesel PM and NO_x emissions from all cargo handling equipment in the State by up to 80 percent by 2020.

On-Road Heavy Duty Diesel Trucks Regulations: In January of 2001, the U.S. EPA promulgated a Final Rule to reduce emission standards for 2007 and subsequent model year heavy-duty diesel engines (66 FR 5002, January 18, 2001). These emission standards represent a 90% reduction of NO_x emissions, 72% reduction of non-methane hydrocarbon emissions, and 90 percent reduction of PM emissions compared to the 2004 model year emission standards. The ARB adopted similar emission standards and test procedures to reduce emissions from 2007 and subsequent model year heavy-duty diesel engines and vehicles. This stringent emission standards will reduce NO_x and diesel PM emissions statewide from on-road heavy diesel trucks by approximately 50 and 3 tons per day, respectively, in 2010; by 140 and 6 tons per day, respectively, in 2015; and by 210 and 8 tons per day, respectively, in 2020.

Transport Refrigeration Unit (TRU) Air Toxics Control Measure (ATCM): This air toxics control measure is applicable to refrigeration systems powered by integral internal combustion engines designed to control the environment of temperature sensitive products that are transported in trucks, trailers, railcars, and shipping containers. Transport refrigeration units may be capable of both cooling and heating. Estimates show that diesel PM emission factors for transport refrigeration units and transport refrigeration unit Gen-set engines will be reduced by approximately 65 percent in 2010 and 92 percent in 2020. California's air quality will also experience benefits from reduced NOx emissions and reduced HC emissions. The transport refrigeration unit air toxics control measure is designed to use a phased approach over about 15 years to reduce the PM emissions from in-use transport refrigeration unit and transport refrigeration unit generator set engines that operate in California. The new rule became effective on December 10, 2004.

Proposed On-Road In-Use Truck Regulations: The ARB is developing a control measure to reduce diesel PM and oxides of nitrogen (NO_x) emissions from private fleets of on-road heavy-duty diesel-fueled vehicles. This measure includes, but is not limited to, long and short haul truck-tractors, construction related trucks, port hauling trucks, wholesale and retail goods transport trucks, tanker trucks, package and household goods transport trucks, and any other diesel-powered trucks with a gross vehicle weight rating of 14,000 pounds or greater. The proposed goals of the regulations are: (a) by 2014, emissions are to be no higher than a 2004 model year engine with a diesel particulate filter, and (b) by 2020, emissions are to be no higher than a 2007 model year engine.

Proposed In-Use Port and Railyard Truck Mitigation Strategies: The ARB is evaluating a port truck fleet modernization program that will substantially reduce diesel PM and NOx emissions by 2010, with additional reductions by 2020. There are an estimated 12,000 port trucks operating at the 3 major California ports which are a significant source of air pollution, about 7,075 tons per year of NOx and 564 tons per day of diesel PM in 2005, and operate in close proximity to communities. Strategies will include the retrofit or replacement of older trucks with the use of diesel particulate filters and a NOx reduction catalyst system. ARB staff will propose regulatory strategies for ARB Board consideration by the end of 2007 or early 2008.

ARB Tier 4 Off-Road Diesel-Fueled Emission Standards: On December 9, 2004, the Board adopted a fourth phase of emission standards (Tier 4) that are nearly identical to those finalized by the U.S. EPA on May 11, 2004, in its Clean Air Non-road Diesel Rule. As such, engine manufacturers are now required to meet aftertreatment-based exhaust standards for particulate matter (PM) and NOx starting in 2011 that are over 90 percent lower than current levels, putting off-road engines on a virtual emissions par with on-road heavy-duty diesel engines.

U.S. EPA Locomotive Emission Standards: Under the Federal 1990 Clean Air Act, U.S. EPA has sole authority to adopt and enforce locomotive emission standards. This federal preemption also extends to the remanufacturing of existing locomotives. The ARB has been encouraging the U.S. EPA to expeditiously require the introduction of Tier 4 locomotives built with diesel particulate filters and selective catalytic reduction. U.S. EPA released the notice of proposed regulation rulemaking (NPRM) for locomotives and marine vessels in the Federal Register on April 3, 2007. The NPRM proposed interim reduction in diesel PM emissions for locomotives from 2010-2013, but the final proposed standards would not be applicable to new locomotives until 2017. The final regulations are expected to be approved by early 2008.

ARB Goods Movement Emission Reduction Plan (GMERP): Approved in 2006, the GMERP provides goods movement emissions growth estimates and proposed strategies to reduce emissions from ships, trains, and trucks and to maintain and improve upon air quality. Based largely on the strategies discussed, one of the goals of the GMERP is to reduce locomotive NO_x and diesel PM emissions by up to 50 percent by 2015, and by up to 90 percent by 2020.

California Yard Locomotive Replacement Program: One locomotive strategy identified in the GMERP is to replace California's older switcher yard locomotives (currently about 800) that operate in and around railyards statewide. There are government incentive programs that may be able to assist in funding the replacement of some intrastate locomotives by 2010.

III. BNSF WATSON RAILYARD DIESEL PM EMISSIONS

This chapter provides a summary of the diesel PM emissions in and around the BNSF Watson Railyard.

In 2005, the combined diesel PM emissions from the BNSF Watson Railyard (on-site emissions) and significant non railyard emission sources within a one-mile distance from the railyard boundary (off-site emissions) are estimated at about 6.5 tons per year. The BNSF Watson Railyard diesel PM emissions are estimated at about 1.9 tons per year, which accounts for about 30% of the total combined on-site and off-site diesel PM emissions. Estimated off-site diesel PM emissions from mobile sources (not generally related to activities at the railyard) are about 3.2 tons per year, or about 50% of the total combined on-site and off-site diesel PM emissions. Off-site stationary sources contribute 1.35 tons per year, or about 20% of the total combined on-site and off-site diesel PM emissions.

A. BNSF Watson Railyard Operations

The BNSF Watson Railyard activity data and emission inventories were provided by BNSF and its consultant ENVIRON International. The methodology used to calculate the diesel PM and other toxic air contaminant (TAC) emissions is based on ARB *Rail Yard Emissions Inventory Methodology* (ARB, 2006e). Detailed calculation methodologies and resulting emission factors are included in the emission inventory report (ENVIRON, 2006a).

The BNSF Watson Railyard primarily consists of a classification yard to support train arrival and departure activities. The classification yard is approximately a half mile in length and contains approximately 20 parallel rail lines that converge into two single rail lines at the north end of the railyard. A single rail line is also located at the south end of the railyard. The emission activities include locomotive line-haul, locomotive switching, locomotive refueling, track maintenance equipment, transportation refrigeration units (TRU), and on-road fleet vehicle activities.

Arriving and departing locomotive line haul activities at the BNSF Watson Railyard may occur on any of the rail lines within the railyard. The majority of locomotives (i.e., 90%) enter and depart the railyard from the direction of the Alameda Corridor (i.e., from the northeast), and the remainder of locomotive traffic into and out of the railyard is approximately evenly split between the northwest and south entrances (i.e., 5% at each of these two entrances). A significant part of the arrival and departure of line haul locomotives at the BNSF Watson Railyard is due to unit trains transporting ethanol from the Midwest to Southern California at volumes of about 340 million gallons per year. Within a one-year period, a total of about 120 Ethanol Express Trains arrive and depart from the BNSF Watson Railyard, in the frequency of one train every three days.

Locomotive service at the BNSF Watson Railyard is limited to direct refueling by truck. Locomotive idling emissions occur during refueling along an approximately 100-yard segment of rail near the west boundary of the railyard north of the Pacific Coast

Highway overpass. Locomotive switching activities are limited to the rail segments north of the Pacific Coast Highway overpass due to noise concerns in residential areas adjacent to the southwest boundary of the railyard. Container and boxcar TRU activities occur anywhere locomotives operate south of the “Y” intersection of the rail lines at the north end of the railyard. Track maintenance equipment operations may occur over all rail lines at the railyard.

The BNSF Watson Railyard on-road fleet vehicle activities (i.e., employee vehicles) are confined to the triangular shaped area surrounding the Trainmaster Office at the northern end of the railyard. Non-BNSF on-road fleet vehicles include the fuel trucks that deliver fuel directly to locomotives. These fuel trucks enter the railyard at an ingress near the west boundary, travel along the west boundary, and pull up alongside the locomotive(s) along the section of track designated for locomotive fueling activities as discussed above.

The schematic locations of the operations at the BNSF Watson Railyard are presented in Figure III-1. Additional descriptions of the operations can be found in the emission inventory report (ENVIRON, 2006a).

Figure III-1. The BNSF Watson Railyard Emission Source Locations

B. Summary of the BNSF Watson Railyard Diesel PM Emissions

The diesel PM emissions from the BNSF Watson Railyard sources are estimated to be approximately 1.9 tons per year, as shown in Table III-1.

Table III-1: Summary of Diesel PM Emissions at the BNSF Watson Railyard

Source Types	Diesel PM Emissions	
	tons/year	Percentage
Locomotive	1.88	97%
Off-Road Equipment	0.05	3%
On-Road Vehicles	< 0.01	< 1%
Total	**1.92**	**100%**

Diesel PM was not the only toxic air contaminant (TAC) emitted in the BNSF Watson Railyard. A relatively small amount of gasoline PM was generated from on-road fleet vehicle, and other TACs were generated from on-road vehicles and off-road track equipment. The gasoline PM emissions were about 0.4 pounds per year and other top non-PM TACs (1,3-butadiene, benzene, formaldehyde, and acetaldehyde) emissions were about 0.05 pounds per year, which are significantly less lower compared to the 1.9 tons per year of the diesel PM emissions in the railyard.

In addition, adjusting these emissions on a cancer potency weighted basis for their toxic potential (see a similar analysis for off-site air toxic contaminants on Table II-3), these non-diesel PM toxic air contaminants have less than 10 thousandth of potential cancer risks as compared to diesel PM (less than 0.0001 vs. 1.9 tons per year). Hence, only diesel PM emissions are presented in the on-site emission analysis.

1. Locomotives

Locomotives are the largest diesel PM emission sources within the BNSF Watson Railyard, which contribute to about 97% of the total diesel PM emissions at about 1.88 tons per year. The locomotive operations at the railyard are divided into three emission categories: arriving-departing line haul locomotives, switching locomotives (i.e., moving railcars within the yard), and basic locomotive services (limited to refueling). A total number of line haul locomotives that arrive and depart from the BNSF Watson Railyard was recorded as 4,943 for the year 2005. The total switching activity time was estimated at 4,200 hours per year. Locomotive service at the BNSF Watson Railyard is limited to refueling by trucks. About one thousand or approximately 1/3 of the locomotives arriving at this site were refueled for the year 2005. The locomotive diesel PM emissions were primarily due to train arrival and departure activities, comprising about 1.39 tons per year. As discussed above, a significant part of the arrival and departure of line haul locomotives at the BNSF Watson Railyard is due to Ethanol

Express Trains serving up to 80% (about 340 million gallons per year) of Southern California's demand for fuel blend ethanol. The railyard operations, primarily switch locomotives within the railyard, contributed 0.43 tons per year, and the basic locomotive service accounted for 0.06 tons per year of diesel PM emissions.

The locomotive operations data includes the number of engines serviced, and the typical time in notch setting for those engines receiving services. Temporal emission profiles were estimated for each activity based on hourly locomotive counts. The profiles developed accounts for hourly, daily and seasonal temporal variation and is reflected in air dispersion modeling to capture operation variation.

According to BNSF, the BNSF interstate locomotives were fueled out of state before they entered the California borders. BNSF estimated a fuel mixture of about 50% CARB-EPA on-road to 50% non-road diesel fuel, based on the refueling data (see the *Wilmington-Watson Railyard TAC Emission Inventory*, ENVIRON, 2006a). This approach overestimated non-road (i.e., non CARB-EPA diesel fuel) fuel usage, since it disregarded the consumption of out-of-state fuel before arriving California. This was, therefore, a conservative assumption. A more realistic operating scenario would be a fuel mixture of about 75% CARB-EPA on-road to 25% non-road diesel fuel, which would account for substantial volumes of non-road diesel fuel being consumed before arriving in California. By assuming a mixture of 50% CARB-EPA on-road to 50% non-road diesel fuel, BNSF estimated a sulfur content of about 1,050 ppmw.

The locomotive diesel PM emission factors used in this study is presented in Appendix D. Table III-2 presents the summary of diesel PM emissions from locomotive operation activities.

Table III-2: Locomotive Diesel PM Emissions

Locomotive Operations	Diesel PM Emissions	
	Tons per year	Percentage
Line Haul Locomotives Arrivals/Departures	1.39	74%
Switch Locomotives Conducting Yard Operations	0.43	23%
Basic Service (Locomotive Refueling by Trucks)	0.06	3%
Total	**1.88**	**100%**

The ARB has developed an integrated approach to reduce statewide locomotive emissions through a combination of voluntary agreements, ARB and U.S. EPA regulations, incentive funding programs, and early replacement of California's line haul and railyard locomotive fleets. The detailed approach has been discussed in Chapter 2. Therefore, the BNSF Watson Railyard will benefit from these mitigation measures as diesel PM emissions from locomotives are gradually reduced in the future. Under GMERP, ARB proposed a program to replace all switch locomotives with new technology to reduce diesel PM and NOx emissions up to 90 percent by 2010. This single measure could reduce BNSF Watson Railyard diesel PM emissions by almost 20 percent.

2. Off-Road Equipment

Two types of off-road equipment, transport refrigeration units (TRUs) and track maintenance equipment, were utilized at the BNSF Watson Railyard. Diesel PM emissions from these off-road equipment were estimated at about 90 pounds per year. Table III-3 shows the amount and percentage of diesel PM emissions for this source category.

Table III-3: Off-Road Equipment Diesel PM Emissions

Off-Road Equipment	Diesel PM Emissions	
	(pounds per year)	Percentage
Boxcar TRUs	48	53%
Off-Road Track Maintenance	32	36%
Container TRUs	10	11%
Total	**90**	**100%**

In November 2004, ARB adopted a new regulation: Airborne Toxic Control Measure (ATCM) for In Use Diesel-Fueled Transport Refrigeration Units (TRUs), TRU Generator Sets and Facilities where TRUs Operate. This regulation applies to all TRUs in California, including those coming into California from out-of-state. It requires in use TRU and TRU generator set engines to meet specific diesel PM emissions that vary by horsepower range and engine model year, starting December 31, 2008 for engine model years 2001 or older. ARB staff estimates that diesel PM emissions for TRUs and TRU generator set engines will be reduced by approximately 65% by 2010 and 92% by 2020. Therefore starting in 2009, the BNSF Watson Railyard will benefit from these mitigation measures as diesel PM emissions from TRUs are gradually reduced as their fleets turnover.

3. On-Road Fleet Vehicles

On-road fleet vehicle operations included one light-duty gasoline car and various diesel trucks delivering fuel to the railyard in order to refuel the locomotives (1,152,454 records in total). Diesel PM emissions from on-road trucks contribute to about 0.01% of the total railyard emissions at about 0.5 pounds per year.

In January of 2001, the U.S. EPA promulgated a Final Rule for emission standards for 2007 and subsequent model year heavy-duty diesel engines (66 FR 5002, January 18, 2001). These emission standards represent a 90 percent reduction of oxides of nitrogen emissions, 72 percent reduction of non-methane hydrocarbon emissions, and 90 percent reduction of particulate matter emissions compared to the 2004 model year emission standards. Therefore starting in 2007, the BNSF Watson Railyard will benefit from these mitigation measures since diesel PM emissions from heavy-duty diesel fueled trucks are gradually reduced as the truck fleets turnover.

C. Current Applicable Diesel Fuel Regulations and Their Benefits to the Railyards

1. California Air Resources Board (CARB) Diesel Fuel Specifications

The original California diesel fuel specifications were approved by the Board in 1988 and limited sulfur and aromatic contents. The requirements for “CARB diesel,” which became applicable in October 1993, consisted of two basic elements:

- A limit of 500 parts per million by weight (ppmw) on sulfur content to reduce emissions of both sulfur dioxide and directly emitted PM.
- A limit on aromatic hydrocarbon content of 10 volume percent for large refiners and 20 percent for small refiners to reduce emissions of both PM and NOx.

At a July 2003 hearing, the Board approved changes to the California diesel fuel regulations that, among other things, lowered the maximum allowable sulfur levels in California diesel fuel to 15 ppmw beginning in June 2006. Thus, ARB's specifications for sulfur and aromatic hydrocarbons are shown in Table III-4.

Table III-4: California Diesel Fuel Standards

Implementation Date	Maximum Sulfur Level (ppmw)	Aromatics Level (% by volume)	Cetane Index
1993	500	10	N/A
2006	15	10	N/A

The regulation limiting aromatic hydrocarbons also includes a provision that enables producers and importers to comply with the regulation by qualifying a set of alternative specifications of their own choosing. The alternative formulation must be shown, through emissions testing, to provide emission benefits equivalent to that obtained with a 10 percent aromatic standard (or in the case of small refiners, the 20 percent standard). Most refiners have taken advantage of the regulation’s flexibility to produce alternative diesel formulations that provide the required emission reduction benefits at a lower cost.

2. U.S. EPA On-Road Diesel Fuel Specifications

The United States Environmental Protection Agency (U.S. EPA) established separate diesel fuel specifications for on-road diesel fuel and off-road (non-road) diesel fuel. The former U.S. EPA diesel fuel standards were applicable in October 1993. The U.S. EPA regulations prohibited the sale or supply of diesel fuel for use in on-road motor vehicles, unless the diesel fuel had a sulfur content no greater than 500 ppmw. In addition, the regulation required on-road motor-vehicle diesel fuel to have a cetane index of at least 40 or have an aromatic hydrocarbon content of no greater than 35 percent by volume (vol. %). All on-road motor-vehicle diesel fuel sold or supplied in the United States, except in Alaska, must comply with these requirements. Diesel fuel, not intended for on-road motor-vehicle use, must contain dye solvent red 164.

On January 18, 2001, the U.S. EPA published a final rule which specified that, beginning June 1, 2006, refiners must begin producing highway diesel fuel that meets a maximum sulfur standard of 15 ppmw. All 2007 and later model year diesel-fueled vehicles must be fueled with this new low sulfur diesel. The current U.S. EPA on-road diesel fuel standard is shown in Table III-5.

3. U.S. EPA Non-Road Diesel Fuel Specifications

Until recently, fuel supplied to outside of California was allowed a sulfur content of up to 5,000 ppmw (parts per million by weight). However, in 2004, the U.S. EPA published a strengthened rule for the control of emissions from non-road diesel engines and fuel. The U.S. EPA rulemaking requires that sulfur levels for non-road diesel fuel be reduced from current uncontrolled levels of 5,000 ppmw ultimately to 15 ppmw, though an interim cap of 500 ppmw is contained in the rule. Beginning June 1, 2007, refiners are required to produce non-road, locomotive, and marine diesel fuel that meets a maximum sulfur level of 500 ppmw. This does not include diesel fuel for stationary sources. In 2010, non-road diesel fuel will be required to meet the 15 ppmw standard except for locomotives and marine vessels. In 2012, non-road diesel fuel used in locomotives and marine applications must meet the 15 ppmw standard. The non-road diesel fuel standards are shown above in Table III-5.

Table III-5: U.S.EPA Diesel Fuel Standards

Applicability	Implementation Date	Maximum Sulfur Level (ppmw)	Aromatics Maximum (% by volume)	Cetane Index (Minimum)
On-Road	2006	15	35	40
Non-road *	1993	5,000	35	40
Non-road *	2007	500	35	40
Non-road, *excluding loco/marine* *	2010	15	35	40
Non-road, *loco/marine* *	2012	15	35	40

*: Non-road diesel fuels must comply with ASTM No. 2 diesel fuel specifications for aromatics and cetane.

4. What are the Current Properties of In-Use Diesel Fuel?

Table III-6 shows average values for sulfur and four other properties for motor vehicle diesel fuel sold in California before and after California and Federal diesel fuel regulations became effective in 1993. The corresponding national averages are shown for the same properties for on-road diesel fuel only since the U.S. EPA sulfur standard does not apply to off-road or non-vehicular diesel fuel. Non-road diesel fuel sulfur levels have been recorded as about 3,000 ppmw in-use and aromatics level of about 35 percent by volume in-use.

Table III-6: Average 1999 Properties of Reformulated Diesel Fuel

Property	California	U.S.[1]
Sulfur, ppmw	10[2]	10 [2]
Aromatics, vol.%	19	35
Cetane No.	50	45
PNA, wt.%	3	NA
Nitrogen, ppmw	150	110

1 U.S. EPA, December 2000.
2 Based on margin to comply with 15 ppmw sulfur standards in June 2006.

5. Diesel Fuels Used by California-Based Locomotives?

The ARB Board approved a regulation in November 2004 which extended the CARB diesel fuel requirements to intrastate locomotives (those operating 90 percent or more of the time in California) effective on January 1, 2007. UP and BNSF agreed in the 2005 railroad Agreement to dispense only CARB diesel or U.S. EPA on-road diesel fuels to interstate locomotives that fuel in California beginning on January 1, 2007.

Line haul locomotives have a range of about 800 to 1,200 miles between fuelings. BNSF locomotives typically refuel at Belen, New Mexico before traveling to Barstow, California and UP locomotives typically refuel at Salt Lake City, Utah before traveling to

Roseville in northern California or Colton in southern California. These major out-of-state railroad facilities have the option to use Federal non-road diesel fuels for the refueling of line haul locomotives

UP and BNSF surveyed each of the California fueling centers, and major interstate fueling centers to California, to estimate the average diesel fuel properties for locomotives for the railyard health risk assessments. Diesel fuel sulfur levels were estimated to be an average of 1,050 ppmw based on the mixture of CARB, U.S. EPA onroad, and non-road diesel fuel consumed by locomotives in California in 2005. ARB staff believes this is a conservative estimate for the types of diesel fuels and sulfur levels consumed by locomotives in California.

The U.S. EPA on-road and CARB on and off-road diesel ultra low sulfur specifications (15 ppmw) went into effect on June 1, 2006. The CARB diesel fuel requirements for intrastate locomotives went into effect on January 1, 2007. The U.S. EPA non-road diesel fuel sulfur limit will drop from 5,000 ppmw to 500 ppmw on June 1, 2007. In 2012, the non-road diesel fuel limits for used in locomotives and marines will drop from 500 ppmw to 15 ppmw.

The NOx emission benefits associated with the use of CARB diesel compared to U.S. EPA on-road and non-road diesel fuels are due to the CARB aromatic hydrocarbon limit of 10 percent by volume or an emission equivalent alternative formulation limit. ARB staff estimates that use of CARB diesel provides a 6 percent reduction in NOx and a 14 percent reduction in particulate emissions compared with the use of U.S. EPA on-road and non-road diesel fuels. In addition, CARB diesel fuel will provide over a 95 percent reduction in fuel sulfur levels in 2007 compared to U.S. EPA non-road diesel fuel. This reduction in diesel fuel sulfur levels will provide SOx emission reductions, and additional PM emission reductions by reducing indirect (secondary formation) PM emissions formed from SO_x.

In addition, the ARB, UP and BNSF Railroads entered into an agreement in 2005 which requires at least 80 percent of the interstate locomotives must be fueled with either CARB diesel or U.S. EPA on-road ultra low sulfur diesel fuel by January 1, 2007. Both the CARB diesel fuel regulation for intrastate locomotives and the 2005 Railroad Agreement for interstate locomotives require the use of ultra low sulfur diesel fuel in 2007, five years earlier than the U.S. EPA non-road diesel fuel regulations for locomotives in 2012.

6. What are the Potential Overall Benefits from the Use of Lower Sulfur Diesel Fuels?

Both the U.S. EPA and CARB diesel fuels had sulfur levels lowered from 500 ppmw to 15 ppmw on June 1, 2006. Under the prior sulfur specification of 500 ppmw, CARB diesel fuel in-use sulfur levels averaged around 140 ppmw versus U.S. EPA on-road sulfur levels of about 350 ppmw. With the 2006 implementation of the 15 ppmw sulfur levels, in-use levels for both CARB diesel and U.S. EPA on-road now average about 10 ppmw.

Sulfur oxides and particulate sulfate are emitted in direct proportion to the sulfur content of diesel fuel. Reducing the sulfur content of diesel fuel from the California's statewide average of 140 ppmw to less than 10 ppmw would reduce sulfur oxide emissions by about 90 percent or by about 6.4 tons per day from 2000 levels. Direct diesel particulate matter emissions would be reduced by about 4 percent, or about 0.6 tons per year in 2010 for engines not equipped with advanced particulate emissions control technologies. U.S. EPA on-road lower sulfur diesel fuel would provide similar levels of sulfur oxide and direct diesel particulate matter emission reductions.

The emissions reductions would be obtained with low sulfur diesel used in mobile on-road and off-road engines, portable engines, and those stationary engines required by district regulations to use CARB diesel. In addition, NO_x emissions would be reduced by 7 percent or about 80 tons per year for those engines not currently using CARB diesel, assumed to be about 10 percent of the stationary engine inventory and including off-road mobile sources such as interstate locomotives.

The lower sulfur diesel makes much more significant emissions reductions possible by enabling the effective use of advanced emission control technologies on new and retrofitted diesel engines. With these new technologies, emissions of diesel particulate matter and NO_x can be reduced by up to 90 percent. Significant reductions of non-methane hydrocarbons and carbon monoxide can also be achieved with these control devices.

D. Summary of Off-Site Diesel PM Emissions

Significant off-site diesel PM emission sources within a one-mile distance from the BNSF Watson Railyard boundary were evaluated. This distance was chosen because the results of the UP Roseville Railyard Study (ARB, 2004a) indicated that cancer risk is substantially reduced within one mile from the sources of diesel PM emissions. Total off-site diesel PM emissions within a one-mile distance from the BNSF Watson Railyard boundary were estimated at 4.5 tons per year in 2005. Mobile sources contributed 70% and stationary sources contributed 30% of the total off-site diesel PM emissions.

1. Mobile Sources

> **Roadway link:** is defined as a discrete section of roadway with unique estimates for the fleet specific population and average speed and is classified as a freeway, ramp, major arterial, minor arterial, collector, or centroid connector.

For the off-site mobile sources, the analysis focused on on-road heavy duty diesel trucks, as they are the primary source of diesel PM from the on-road vehicle fleet. ARB staff estimated mobile emissions based on roadway specific vehicle activity data and allocated them to individual roadway links. All roadway links within a two-mile distance from the joint boundaries of the four Commerce railyards are included in the analysis. The estimates do not include the diesel PM emissions generated from other modes such as extended idling, starts, and off-road equipment outside the rail yards. Individual sources such as local truck distribution centers and warehouses were not evaluated due to insufficient activity data, but their truck traffic related to these facilities is reflected in the roadway link traffic activities. Because the off-site mobile sources have only focused on the on-road diesel emissions, the exclusion of extended idling and off-road equipment may result in an underestimation of off-site mobile sources emissions.

Within a one-mile distance from the boundary of the BNSF Watson Railyards, 70% of off-site diesel PM emissions were generated by mobile sources. The majority of the off-site mobile source diesel PM emissions are generated from diesel-fueled heavy duty trucks serving the nearby refineries and chemical plants. Diesel-fueled vehicles passing the Pacific Coast Highway and major local streets are also responsible for the off-site mobile source diesel PM emissions. The off-site mobile source diesel PM emissions were estimated based on the local traffic flow, and calculated by different classifications of truck gross vehicle weights, as shown in Table III-7. For the year 2005, the total diesel PM emissions are estimated at about 3.2 tons per year with up to 99% generated from heavy-heavy duty and medium heavy duty trucks. The two truck classifications account for about 2.48 and 0.65 tons per year of diesel PM emissions, respectively.

Table III-7: Off-Site Mobile Source Diesel PM Emissions

Vehicle Types of Off-Site Mobile Diesel PM Sources	Gross Vehicle Weight (pounds)	Diesel PM Emissions	
		Tons per year	Percent of Total
Heavy-Heavy Duty Trucks	> 33,000	2.48	78%
Medium-Heavy Duty Diesel Trucks	14,001-33,000	0.65	21%
Light-Heavy Duty Diesel Trucks	8,501-14,000	0.05	1%
Total	**-**	**3.18**	**100%**

2. Stationary Sources

Emissions from off-site stationary source facilities are identified using the California Emission Inventory Development and Reporting System (CEIDARS) database, which contains information reported by the local air districts for stationary sources within their jurisdiction. The CEIDARS facilities whose locations fell within the one-mile distance from the boundary of the BNSF Watson Railyard are selected. Diesel PM emissions are estimated from stationary internal combustion (IC) engines burning diesel fuel, operating at stationary sources reported in CEIDARS.

Table III-8 presents a summary of off-site stationary source diesel PM emissions from different facilities or owners identified by ARB staff. The total stationary source diesel PM emissions were estimated at about 1.35 tons per year in 2005. Equilon Enterprise, LLC contributed about 78% of the total off-site stationary source diesel PM emissions. Detailed discussion for estimating the off-site stationary source emissions can be found in Appendix B.

Table III-8: Off-Site Stationary Source Diesel PM Emissions

Off-Site Stationary Sources	Diesel PM Emissions	
	Tons per year	Percent of Total
Equilon Enterprises, LLC	1.05	78%
ConocoPhillips Company	0.30	22%
ARCO Western Pipeline	0.003	< 1%
Air Products & Chemicals	0.001	< 1%
TOTAL	**1.35**	**100%**

ARB staff also evaluated other toxic air contaminant (TACs) emissions around the BNSF Watson Railyard. There are 16 stationary TAC sources identified within the one-mile distance from the railyard boundary. The total emissions of TACs, other than diesel PM emitted from these stationary sources, were estimated at about 171 tons per year. Over 60 TAC species are identified among these emissions, in which over 70% (122 tons per year) are identified as ammonia.

Not all of these TACs are identified as carcinogens. According to ARB's *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (ARB, 2000), diesel PM and top five non-diesel PM TACs (including 1,3-butadiene, benzene, carbon tetrachloride, formaldehyde, and hexavalent chromium) account for 97% of the state's estimated potential cancer risk levels (ARB, 2000). This study also concluded that diesel PM contributes over 70% percent of the state's estimated potential cancer risk levels, which are significantly higher than other TACs (ARB, 2000). Carbon tetrachloride was not identified within a one-mile distance from the BNSF Watson Railyard boundary, other top four cancer risk contributors other than diesel PM were estimated at about 6.2 tons per year. Up to 90% (5.6 out of 6.2 tons per year) of these top non-diesel-PM TACs were generated by Equilon Enterprise, LLC.

Cancer potency factors (CPF) are expressed as the 95% upper confidence limit of excess cancer cases occurring in an exposed population assuming continuous lifetime exposure to a substance at a dose of one milligram per kilogram of body weight, and are expressed in units of $(mg/kg\text{-}day)^{-1}$.

The Office of Environmental Health Hazard Assessment (OEHHA) has estimated an inhalation cancer potency factor (CPF) for individual chemicals and some chemical mixtures such as whole diesel exhaust. Diesel PM contains many individual cancer causing chemicals. The individual cancer causing chemicals from diesel exhaust are not separately evaluated so as to avoid double counting. The four compounds other than diesel PM listed here are given a weighting factor by comparing each compound's CPF to the diesel PM CPF. This factor is multiplied by the estimated emissions for that compound, which gives the cancer potency weighted toxic emissions. As can be seen in Table III-9, the potency weighted toxic emissions for these TACs are about 0.86 tons per year, which is comparable to the off-site diesel PM emissions.

Table III-9: Cancer Potency Weighted Toxic Emissions from Significant Off-Site Stationary Sources Surrounding BNSF Watson Railyard

Compound	Cancer Potency Factor	Weighting Factor	Estimated Emission (tons/year)	Potency Weighted Toxic Emission (tons/year)
Diesel PM (DPM)	1.1	1	1.35	**1.35**
Hexavalent Chromium	510	464	0.001	**0.46**
1,3-Butadiene	0.6	0.55	0.29	**0.16**
Benzene	0.1	0.09	1.72	**0.16**
Formaldehyde	0.021	0.021	4.18	**0.08**
Total (non-diesel PM)			**6.19**	**0.86**

In addition, ARB staff evaluated the potential cancer risk levels caused by the use of gasoline in the South Coast Air Basin. Table III-10 shows the emissions of four major carcinogen compounds of gasoline exhausts in the South Coast Air Basin in the year of 2005 (ARB, 2006c). As indicated in Table III-10, the potency weighted emissions of these four toxic air contaminants from all types of gasoline sources are estimated at about 816 tons per year, or about 11% of diesel PM emissions in the South Coast Air Basin. If only gasoline-powered vehicles are considered, the potency weighted emissions of these four TACs are estimated at about 438 tons per year, or about 6% of diesel PM emissions in the Basin. Hence, gasoline-powered vehicular sources are not included in the analysis.

Table III-10: Comparison of Major Gasoline-Use Related Toxic Air Contaminants with Diesel PM Emissions in the South Coast Air Basin

Compound	TACs Emissions (tons/year)			
	From All Sources	Potency Weighted*	From Gasoline Vehicles	Potency Weighted*
Diesel PM	7,446	**7,446**	-	-
1,3-Butadiene	695	**382**	420	**231**
Benzene	3,606	**325**	2,026	**182**
Formaldehyde	4,623	**92**	1,069	**21**
Acetaldehyde	1,743	**17**	314	**3**
Total (non-diesel PM)	10,668	**817**	3,829	**438**

*: Based on cancer potency weighted factors.

IV. AIR DISPERSION MODELING OF THE BNSF WATSON RAILYARD

In this chapter, ARB staff presents the air dispersion modeling performed to estimate the transport and dispersion of diesel PM emissions resulting from the sources in and around the BNSF Watson Railyard. A description of the air quality modeling parameters is listed, including air dispersion model selection, emission source characterizations, meteorological data, model receptor network, and building wake effects. ARB staff also describes model input preparation and output presentation

A. Air Dispersion Model Selection

Air dispersion models are often used to simulate atmospheric processes for applications where the spatial scale is in the tens of meters to tens of kilometers. Selection of air dispersion models depends on many factors, such as characteristics of emission sources (point, area, volume, or line), the type of terrain (flat or complex) at the emission source locations, and source-receptor relationships. For the BNSF Watson Railyard, ARB staff selected the U.S. EPA's newly approved air dispersion model AERMOD to estimate the impacts associated with diesel PM emissions in and around the railyard. AERMOD represents for American Meteorological Society / Environmental Protection Agency Regulatory Model Improvement Committee (**AER**MIC) **MOD**EL. It is a state-of-the-art air dispersion model and is a replacement for its predecessor, the U.S. EPA Industrial Sources Complex (ISC) air dispersion model.

AERMOD has become a U.S. EPA regulatory dispersion model specified by the *U.S. EPA Guideline for Air Quality Methods (*40 CFR Part 51, Appendix W*)* (U.S. EPA, 2005). AERMOD is also the recommended model in the ARB's *Health Risk Assessment Guidance for Railyard and Intermodal Facilities* (ARB, 2006b).

AERMOD is a steady-state plume model that incorporates current concepts about 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. These approaches have been designed to be physically realistic and simple to implement.

B. Source Characterization and Parameters

The emission sources from the locomotives and other mobile sources at the BNSF Watson Railyard are characterized as either a point source or a volume source depending on whether they are stationary or moving. When a mobile source is stationary, such as when it is idling or undergoing load testing, the emissions are simulated as a series of point sources. Model parameters for point sources include emission source height, diameter, exhaust temperature, exhaust exit velocity, and emission rate. The locomotive exhaust temperatures and stack heights vary by locomotive makes, models, notch settings and operation time. While the BNSF assumed more specific temperatures and stack heights from their switchers and line haul locomotives fleets, the UP used data from the Roseville Railyard Study (ARB, 2004a) based on the most prevalent locomotive model of switchers and line hauls to parameterize locomotive emission settings. In total, the assumptions on the locomotive emission parameters are slightly different between BNSF and UP; however, both are within reasonable ranges according to their activities, and the slight differences in stack height have an insignificant impact on predicted air concentrations, within 2 percent, based on a sensitivity analysis conducted by ARB staff.

According to the BNSF, some locomotives at the Watson Railyard had been equipped with AESS (automatic engine start-stop) or SmartStart device (by ZTR Control System) in 2005[3]. However, the BNSF used a more conservative approach that did not incorporate the benefits of using the devices in the locomotive emissions estimation. ARB staff believes that the BNSF's approach is more protective in terms of health impacts.

When a mobile source is traveling, the emissions are simulated as a series of volume sources to mimic the initial lateral dispersion of emissions by the exhaust stack's movement through the atmosphere. Key model parameters for volume sources include emission rate (strength), source release height, and initial lateral and vertical dimensions of volumes.

The emissions from all stationary sources (storage tanks, sand tower, waste water treatment plant, etc.) and portable sources (welders, steam cleaners, air compressors, etc.) are simulated as a series of point sources.

The emission rates for individual locomotives are a function of locomotive type, notch setting, activity time, duration, and operating location. Emission source parameters for all locomotive model classifications at the railyard include emission source height, diameter, exhaust temperature, and exhaust velocity. Since the stationary locomotives were not uniformly distributed throughout the railyard, the locations of individual locomotive emission sources used for the model inputs were determined based on the detailed locomotive distribution and activity information provided by BNSF.

C. Meteorological Data

In order to run AERMOD, the following hourly surface meteorological data are required: wind speed, wind direction, ambient temperature, and opaque cloud cover. In addition, the daily upper air sounding data need to be provided (U.S. EPA, 2004b).

These meteorological variables are important to describe the air dispersion in the atmosphere. The wind speed determines how rapidly the pollutant emissions are diluted and influences the rise of emission plume in the air, thus affecting downwind concentrations of pollutants. Wind direction determines where pollutants will be transported. The difference of ambient temperature and the emission releasing temperature from sources determines the initial buoyancy of emissions. In general, the greater the temperature difference, the higher the plume rise. The opaque cloud cover and upper air sounding data are used in calculations to determine other important

[3] Staff communication between the ARB, BNSF, and ENVIRON, September, 2007.

dispersion parameters. These include atmospheric stability (a measure of turbulence and the rate at which pollutants disperse laterally and vertically) and mixing height (the vertical depth of the atmosphere within which dispersion occurs). The greater the mixing height is, the larger the volume of atmosphere is available to dilute the pollutant concentration.

The meteorological data used in the model are selected on the basis of representativeness. Representativeness is determined primarily on whether the wind speed/direction distributions and atmospheric stability estimates generated through the use of a particular meteorological station (or set of stations) are expected to mimic those actually occurring at a location where such data are not available. Typically, the key factors for determining representativeness are proximity of the meteorological station and the presence or absence of nearby terrain features that might alter airflow patterns.

The area surrounding the BNSF Watson Railyard site is generally flat and would not be expected to exhibit significant variations in wind patterns within relatively short distances. The dominant terrain features/water bodies that may influence wind patterns in this part of the Los Angeles Basin include the hills of the Palos Verdes Peninsula to the west/southwest and the San Pedro Bay and shipping channels to the south of the railyard. Meteorological stations that contain wind speed, wind direction, temperature, and pressure data that may be appropriate for air dispersion modeling located within a 6-mile radius of the BNSF Watson Railyard include four ARB stations, two National Climatic Data Center (NCDC)/National Weather Service (NWS) stations, and four stations that are part of the Port of Los Angeles Terminal Improvement Project monitoring program. Based on ARB criteria for representativeness (ARB, 2006b), wind speed, wind direction, temperature, and pressure data from the St. Peter and Paul School Station, and cloud cover data from the Long Beach Daugherty Field Station were selected to be used in the AERMOD. The upper air sounding data were chosen from the San Diego Miramar Naval Air Station (NAS) station since this station is the only upper air stations in Southern California that NCDC recommends for reliable, complete, and representative upper air stations for air dispersion modeling (ENVIRON, 2006c).

> ***Wind rose****: a rose-like shape plot that depicts wind speed and direction patterns to illustrate prevailing wind* conditions.

According to ARB railyard health risk assessment guidelines (ARB, 2006b), five years of the meteorological data are recommended to be used in the air toxic health risk assessment. Only twelve-month meteorological data from July 2005 through June 2006 were selected for the BNSF Watson Railyard air dispersion modeling as the most representative station (St. Peter and Paul School Station) only had one-year of monitored data available. Surface parameters supplied to the model were specified for the area surrounding the surface meteorological monitoring site as recommended by AERMOD and ARB Guidelines (ARB, 2006d). According to the sensitivity analyses conducted by BNSF, the impacts on the diesel PM air concentration predictions by using the long-term (i.e., five-year) vs. short-term (i.e., one-year) are found to be insignificant. This is consistent with the findings from a sensitivity analysis from one of UP railyards conducted by ARB staff (see Appendix G). Therefore, whether five-year or one-year meteorological data are used, the modeling results show similar estimated exposures and potential cancer risks surrounding the railyard facility. The detailed procedures of meteorological data preparation and the QA/QC are documented by ENVIRON (ENVIRON, 2006c).

Figure IV-1 presents the wind rose and Figure IV-2 provides the wind class frequency distributions for the meteorological conditions at BNSF Watson Railyard.

Figure IV-1: Wind Rose Plot of the BNSF Watson Railyard Area (St. Peter and Paul School Station, July 2005 through June 2006)

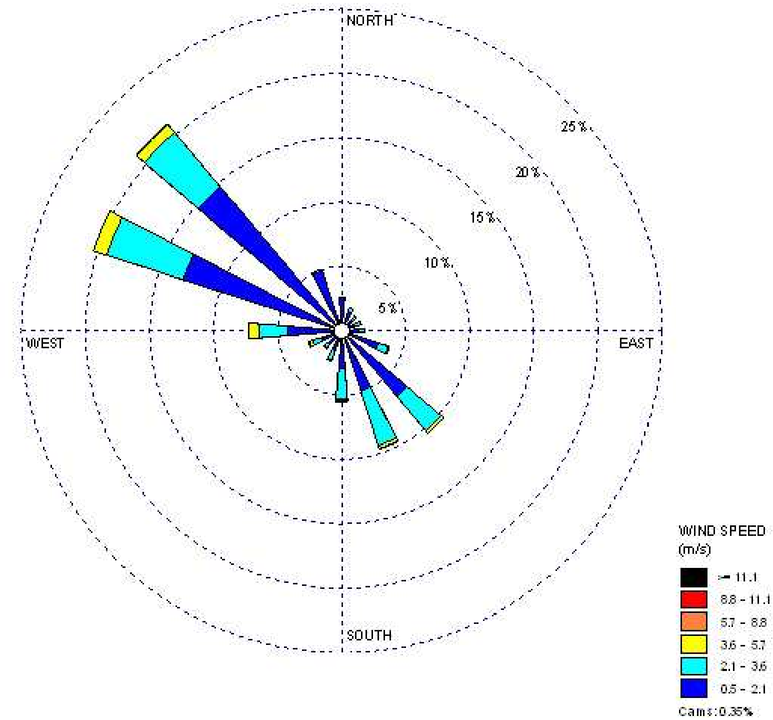
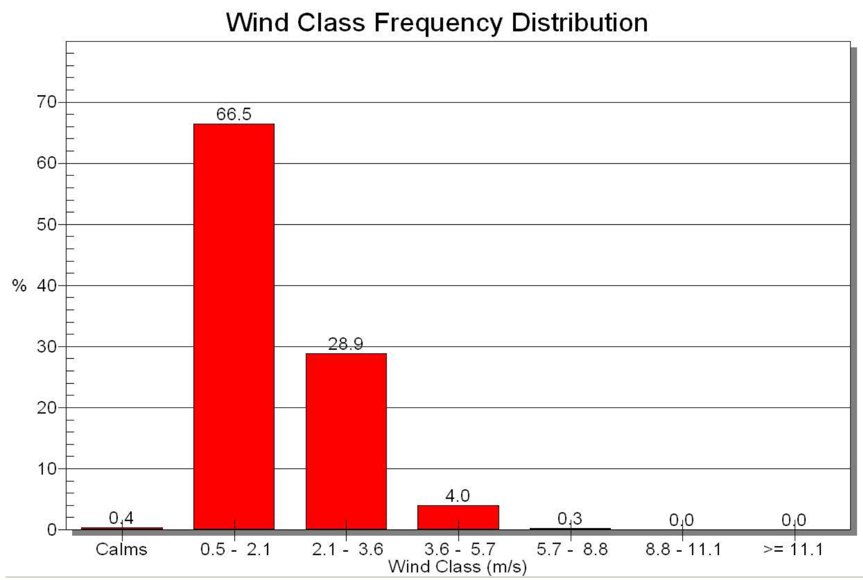


Figure IV-2: Wind Class Frequency Distribution of the BNSF Watson Railyard Area (St. Peter and Paul School Station, July 2005 through June 2006)



D. Model Receptors

Model receptors are the locations where the model provides concentrations. A Cartesian grid receptor network is used in this study where an array of points are identified by their x (east-west) and y (north-south) coordinates. This receptor network is capable of identifying the emission sources within the railyard with respect to the receptors in the nearby residential areas.

According to the ARB's Railyard Health Risk Assessment Guidances (ARB, 2006b), modeling domain is defined as a 12.5x14 km region, which covers the railyard in the center of domain and extends to the surrounding areas. To better capture the different concentration gradients surrounding the railyard area, three sets of receptor grids were used. The ARB's Guidances require coarse and fine modeling receptor grids, in which the Cartesian receptor networks used in model simulations include a fine receptor grid with spacing of 50 meters out to a distance of approximately 500 meters from the facility boundary, and a coarse receptor grid with spacing of 500 meters out to six kilometers from the railyard boundary. A medium receptor grid was applied to model simulations in addition to coarse and fine receptor grids, with spacing of 250 meters out to a distance of approximately 1,500 meters from the railyard boundary. The locations of the fine, medium and coarse receptor grid networks are presented in Figures IV-3a, IV-3b, and IV-3c, respectively.

E. Building Wake Effects

If pollutant emissions are released at or below the "Good Engineering Practice" height as defined by U.S. EPA Guidance (U.S. EPA, 2004a), the plume dispersion may be affected by surrounding facility buildings and structures. The aerodynamic wakes and eddies produced by the buildings or structures may cause pollutant emissions to be mixed more rapidly to the ground, causing elevated ground level concentrations. The AERMOD model has the option--Plume Rise Model Enhancements-- to account for potential building-induced aerodynamic downwash effects. Although all BNSF railyards included building wake effects in their modeling analyses, BNSF conducted a sensitivity analysis and found that the building wake effect has an insignificant impact on the diesel PM air concentrations of the railyard (ENVIRON, 2006b). Detailed treatments of building downwash effects can be found from the ENVIRON Report (ENVIRON, 2006b).

F. Model Implementation Inputs

AERMOD requires four types of basic implementation inputs: control, source, meteorological, and receptor. Control inputs are required to specify the overall job control options for the model run, such as dispersion option, pollutant species, averaging time, etc. Source inputs require source identification and source type (point or volume). Each source type requires specific parameters to define the source. The required inputs for a point source are emission rate, release height, emission source diameter, exhaust exit temperature, and exhaust exit velocity.

Meteorological and receptor inputs have been discussed in Sections C and D. The requirements and the format of input files to the AERMOD are documented in the user's guide of AERMOD (U.S. EPA, 2004b). The model input files for this study is provided in the air dispersion modeling report (ENVIRON, 2006b).

Figure IV-3: The Receptor Grid Networks of Air Dispersion Modeling at the BNSF Watson Railyard

(a)
Fine Grid

(b)
Medium Grid

(c)
Coarse Grid

V. HEALTH RISK ASSESSMENT OF THE BNSF WATSON RAILYARD

This chapter discusses how to characterize potential cancer and non-cancer risks associated with exposure to toxic air contaminants (TACs), especially diesel PM, emitted within and surrounding the BNSF Watson Railyard. In addition, the detailed health risk assessment (HRA) results are presented and the associated uncertainties are discussed qualitatively.

A. ARB Railyard Health Risk Assessment (HRA) Guidelines

The ARB has developed *Health Risk Assessment Guidance for Railyard and Intermodal Facilities* to help ensure that the air dispersion modeling and HRA performed for each railyard meet the requirements in *The Air Toxics Hot Spots Program Risk Assessment Guidelines* published by the Office of Environmental Health Hazard Assessment (OEHHA), and is consistent with the UP Roseville Railyard Study. The OEHHA guidelines outline a tiered approach to risk assessment, providing risk assessors with flexibility and allowing for consideration of site-specific differences:

- Tier 1: a standard point-estimate approach that uses a combination of the average and high-end point-estimates.
- Tier 2: utilizes site-specific information for risk assessment when site-specific information is available and is more representative than the Tier 1 point-estimates.
- Tier 3: a stochastic approach for exposure assessment when the data distribution is available.
- Tier 4: also a stochastic approach, but allows for utilization of site-specific data distribution.

Percentile: Any one of the points dividing a distribution of values into parts each of which contain 1/100 of the values. For example, the 65th percentile breathing rate is a value such that the breathing rates from 65 percent of population are less or equal to it.

The Health Risk Assessment is based on the yard specific emission inventory and air dispersion modeling predictions. The OEHHA guidelines recommend that all health hazard risk assessments adopt a Tier-1 evaluation for the Hot Spots Program, even if other approaches are also presented. Two point-estimates of breathing rates in Tier-1 methodology are used in this HRA, one representing an average and the other representing a high-end value based on the probability distribution of breathing rate. The average and high-end of point-estimates are defined as 65th percentile and 95th percentile from the distributions identified in the OEHHA guidelines (OEHHA, 2000). In 2004, ARB recommended the interim use of the 80th percentile value (the midpoint value of the 65th and 95th percentile breathing rates referred as an estimate of central tendency) as the minimum value for risk management decisions at residential receptors for the breathing intake (ARB, 2004b). The 80th percentile corresponds to a breathing rate of 302 Liters/Kilogram-day (L/kg-day) from the probability distribution function. As indicated by the OEHHA Guidelines, the Tier-1 evaluation is useful in comparing risks among a number of facilities and similar sources.

B. Exposure Assessment

Exposure assessment is a comprehensive process that integrates and evaluates many variables. Three process components have been identified to have significant impacts on the results of a health risk assessment – emissions, meteorological conditions, and exposure duration of nearby residents. The emissions have a linear effect on the risk levels, given meteorological conditions and defined exposure duration. Meteorological conditions can also have a critical impact on the resultant ambient concentration of a toxic pollutant, with higher concentrations found along the predominant wind direction and under calm wind conditions. An individual's proximity to the emission plume, how long he or she breathes the emissions (exposure duration), and the individual's breathing rate play key roles in determining potential risk. In general, the longer the exposure time for an individual, the greater the estimated potential risk for the individual. The risk assessment adopted in this study generally assumes that the receptors will be exposed to the same toxic levels for 24 hours per day for 70 years. If a receptor is exposed for a shorter period of time to a given pollutant concentration of diesel PM, the cancer risk will proportionately decrease. Children have a greater risk than adults because they have greater exposure on a per unit body weight basis and also because of other factors.

Diesel PM was not the only toxic air contaminant (TAC) emitted in the BNSF Watson Railyard. A relatively small amount of gasoline PM was generated from on-road fleet vehicle, and other TACs were generated from on-road vehicles and off-road track equipment. The gasoline PM emissions were about 0.4 pounds per year and other top non-PM TACs (1,3-butadiene, benzene, formaldehyde, and acetaldehyde) emissions were about 0.05 pounds per year, which are significantly less lower compared to the 1.9 tons per year of the diesel PM emissions in the railyard. In addition, adjusting these emissions on a cancer potency weighted basis for their toxic potential (see a similar analysis for off-site air toxic contaminants on Table II-3), these non-diesel PM toxic air contaminants have less than 10 thousandth of potential cancer risks as compared to diesel PM (less than 0.0001 vs. 1.9 tons per year). Hence only the exposure assessment of diesel PM emissions in the BNSF Watson Railyard was conducted in this study.

The ARB staff also evaluated other toxic air contaminants generated in and around the railyard. For the year 2005, the total emissions of toxic air contaminants other than diesel PM emitted from stationary sources within a one-mile distance from the boundary of the BNSF Watson Railyard were estimated at about 171 tons per year. Not all of these toxic air contaminants are identified as carcinogens. According to ARB' *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (ARB, 2000), diesel PM and top five non-diesel-PM toxic air contaminants (including 1,3-butadiene, benzene, carbon tetrachloride, formaldehyde, and hexavalent chromium) account for 97% of the state's estimated potential cancer risk levels (ARB, 2000). This study also concluded that diesel PM contributes over 70% percent of the state's estimated potential cancer risk levels, which are significantly higher than other toxic air contaminants (ARB, 2000). Carbon tetrachloride was not identified within a one-mile distance from the BNSF Watson Railyard boundary, other top four cancer risk contributors other than diesel PM were estimated at about 6.2 tons per year. The potency weighted toxic emissions for these toxic air contaminants at the BNSF Watson are about 0.86 tons per year, which is comparable to the off-site stationary source diesel PM emissions. Further health risk assessments of non-diesel-PM toxic air contaminants emissions may be conducted in future efforts.

In addition, ARB staff evaluated the emissions of four major carcinogen compounds of gasoline exhausts in the South Coast Air Basin in the year of 2005, as discussed in Chapter III. The potency weighted emissions of these four toxic air contaminants from all types of gasoline sources are estimated at about 817 tons per year, or about 11% of diesel PM emissions in the South Coast Air Basin. If only gasoline-powered vehicles are considered, the potency weighted emissions of these four TACs are estimated at about 438 tons per year, or about 6% of diesel PM emissions in the Basin. Therefore, the potential cancer risk levels contributed by non-diesel PM TACs emitted from off-site gasoline-powered vehicular sources are substantially less than the potential cancer risk levels associated with diesel PM, and are not included in the analysis.

The relationship between a given level of exposure to diesel PM and the cancer risk is estimated by using the diesel PM cancer potency factor (CPF). A description of how the diesel cancer potency factor was derived can be found in the document entitled *Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant* (ARB, 1998); and a shorter description can be found in the *Air Toxics Hot Spot Program Risk Assessment Guidelines, Part II, Technical Support Document for Describing Available Cancer Potency Factors* (OEHHA, 2002). The use of the diesel unit risk factor for assessing cancer risk is described in the OEHHA Guidelines (OEHHA, 2003). The potential cancer risk is estimated by multiplying the inhalation dose by the CPF of diesel PM, i.e.,1.1$(mg/kg\text{-}day)^{-1}$.

C. Risk Characterization

Risk characterization is defined as the process of obtaining a quantitative estimate of risk. The risk characterization process integrates the results of air dispersion modeling and relevant toxicity data (e.g., diesel PM cancer potential factor) to estimate potential cancer or non-cancer health effects associated with air contaminant exposure.

Exposures to pollutants that were originally emitted into the air can also occur in different pathways such as breathing, dermal contact, ingestion of contaminated produce, and ingestion of fish that have taken up contaminants from water bodies. These exposures can all contribute to an individual’s health risk. However, diesel PM risk is evaluated by the inhalation pathway only in this study because the risk contributions by other pathways of exposure are insignificant relative to the inhalation pathway. It should be noted that the background or ambient diesel PM concentrations are not incorporated into the risk quantification in this study. Therefore, the estimated potential health risk in the study should be viewed as an addition to the background impacts.

Because the risk characterization is an integrated process from a series of procedures, the overall associated uncertainties are also linked to the uncertainty from each procedural component. Additional details and associated uncertainty on the risk characterization are provided in the Toxic Hot Spot Program Risk Assessment Guidelines (OEHHA, 2003), and discussed in Section D.

In the following sections, we present the predicted cancer and non-cancer risk levels resulting from on-site and off-site emissions.

1. Risk Characterization Associated with On-Site Emissions

a) Cancer Risk

The potential cancer risks levels associated with the estimated diesel PM emissions at the BNSF Watson Railyard were displayed by isopleths. For this analysis, ARB staff elected to present the cancer risk isopleths focusing on risk levels of 10, 25, 50, and100 in a million. Figure V-1a and Figure V-1b present these isopleths. Figure V-1a indicates the potential cancer risk levels of adjacent areas around the railyard, and Figure V-1b shows the risk impacts over regional areas. In each figure, the risk isopleths are overlaid onto a satellite image of the Wilmington area surrounding the BNSF Watson Railyard, to better illustrate the land use (residential, commercial, industrial, or mixed use) of these impacted areas.

The OEHHA Guidelines specify that, for health risk assessments, the cancer risk for the maximum exposure at the point of maximum impact be reported. The point of maximum impact (PMI), which is defined as a location or the receptor point with the highest cancer risk level outside of the railyard boundary, with or without residential exposure, is predicted to be located right next to the east side of the railyard boundary, directly downwind of high emission density areas for the prevailing northwesterly wind, where about 95 percent of facility-wide diesel PM emissions were generated (see the emission allocation in Appendix F). The cancer risk at the PMI is estimated to be about 220 chances in a million. The land use in the vicinity of the point of maximum impact is zoned for industrial use. In the residential zoned area, the potential cancer risk of maximally exposed individual resident (MEIR) or maximum individual cancer risk (MICR) is estimated at about 175 chances in a million. As indicated by Roseville Railyard Study (ARB, 2004a), the location of the PMI may vary depending upon the settings of the model inputs and parameters, such as meteorological data set or emission allocations in the railyard. Therefore, given the estimated emissions, modeling settings, and the assumptions applied to the risk assessment, there are great uncertainties associated with the estimation of the point of maximum impact (PMI) and maximum individual cancer risk (MICR). These indications should not be interpreted as a literal prediction of disease incidence but more as a tool for comparison. In addition, the estimated point of maximum impact and maximum individual cancer risk may not be replicated by air monitoring.

ARB staff also conducted a comparison of cancer risks estimated at the PMI versus MICR, and the differences of facility-wide diesel PM emissions between the UP and BNSF railyards. The ratios of cancer risks at the PMI or MICR to the diesel PM emissions do not suggest that one railroad's facilities have statistically higher cancer risks than the other railroad's or vice versa. Rather, the differences are primarily due to emission spatial distributions from individual operations among railyards.

Figure V-1a: Estimated Adjacent Area Potential Cancer Risks (Chances per Million) Associated with the Diesel PM Emissions from the BNSF Watson Railyard

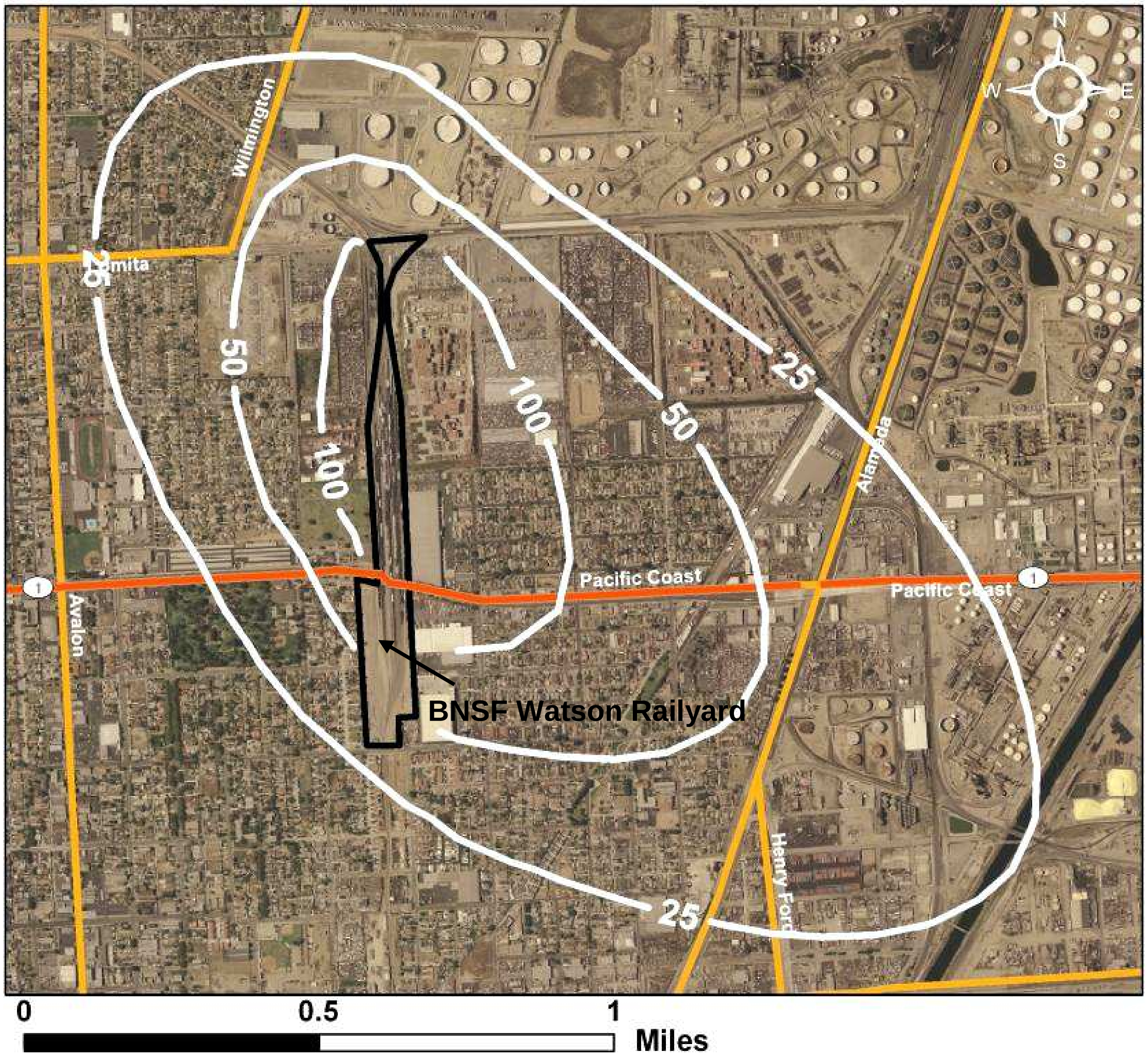
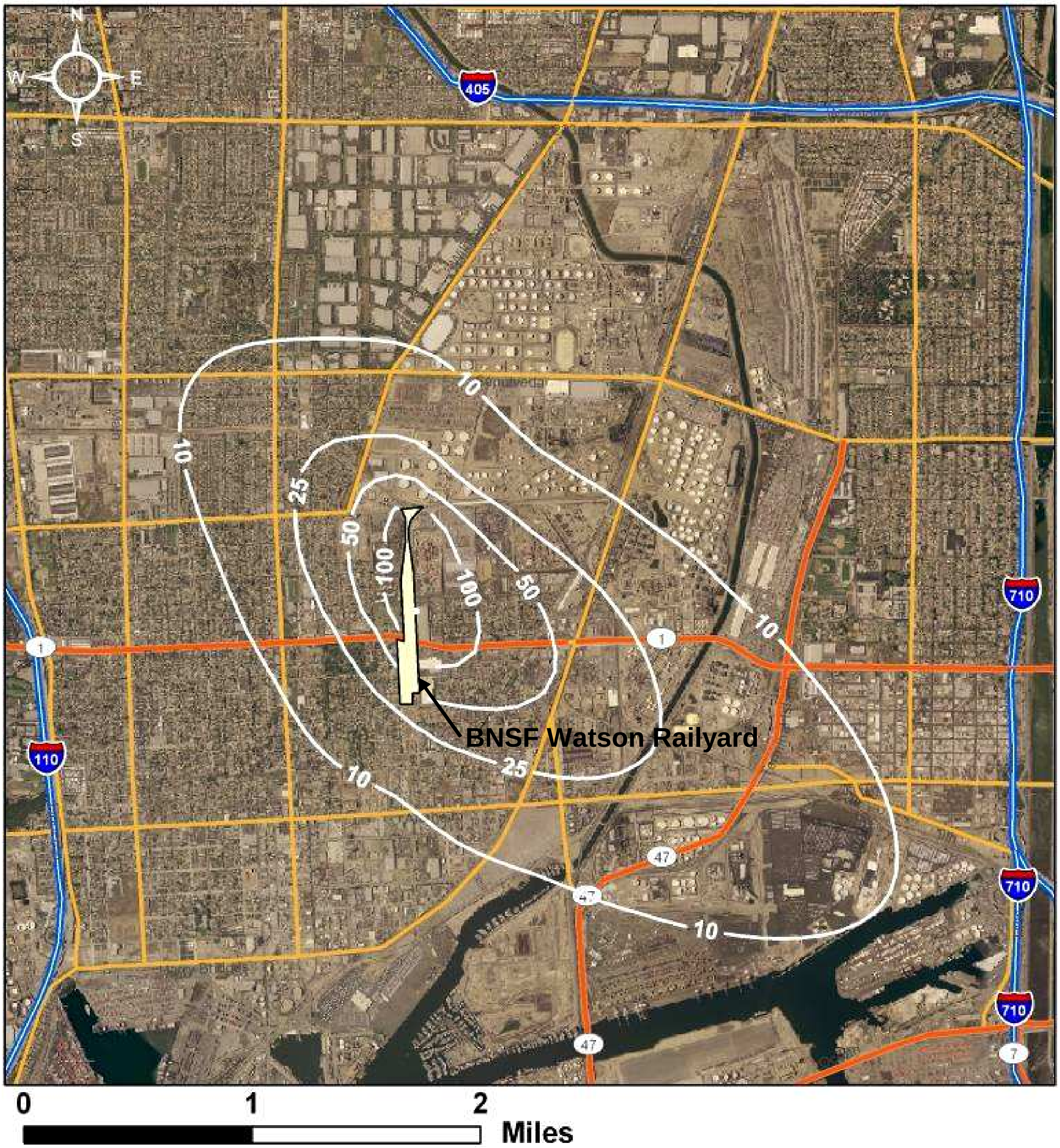


Figure V-1b: Estimated Regional Area Potential Cancer Risks (Chances per Million) Associated with the Diesel PM Emissions from the BNSF Watson Railyard



As shown in Figure V-1b, the cancer risk levels show a sharp gradient of decrease outside of the railyard from a much higher risk level to a level of 10 chances in a million within a one mile distance northeast (mostly industrial) and southwest (mostly residential) of the BNSF Watson Railyard boundary. Because of the characteristics of meteorology, the ambient diesel PM concentrations become more dispersive southeast and northwest of the railyard. The regions with a cancer risk over 10 chances in a million extend up to 2.5 miles southeast and 1.5 miles northwest of the railyard boundary.

It is important to understand that these risk levels represent the predicted risks (due to the BNSF Watson Railyard diesel PM emissions) above the existing background risk levels. For the broader South Coast Air Basin, the estimated regional background risk level is estimated to be 720 in a million caused by diesel PM and about 1,000 in a million caused by all toxic air pollutants in the year of 2000 (ARB, 2006c).

The OEHHA Guidelines recommend a 70-year lifetime exposure duration to evaluate the potential cancer risks for residents. Shorter exposure durations of 30 years and 9 years may also be evaluated for residents and school-age children, respectively, as a supplement. These three exposure durations – 70 years, 30 years, and 9 years – all assume exposure for 24 hours a day, and 7 days a week. It is important to note that children, for physiological as well as behavioral reasons, have higher rates of exposure than adults on a per unit body weight basis (OEHHA, 2003).

To evaluate the potential cancer risks for off-site workers, the OEHHA Guidelines recommend that a 40-year exposure duration be used, assuming workers have a different breathing rate (149 Liters/Kilogram-day) and exposure for an 8-hour workday, five days a week, 245 days a year.

Table V-1 shows the equivalent risk levels of 70- and 30-year exposure durations for exposed residents; and 40- and 9-year exposure durations for off-site workers and school-age children, respectively. As shown in Table V-1, the 10 in a million isopleth line in Figure V-1b would become 4 in a million for exposed population with a shorter residency of 30 years, 2.5 in a million for exposed school-age children, and 2 in a million for off-site workers.

To conservatively communicate the risks, ARB staff presents the estimated cancer risk isopleths all based on 70-year resident exposure duration, even for those impacted industrial areas where no resident lives.

Table V-1: Equivalent Potential Cancer Risk Levels for 70-, 40-, 30-, and 9-Year Exposure Durations

Exposure Duration (years)	Equivalent Risk Level (Chance in a million)					
70	10	25	50	100	250	500
30	4	11	21	43	107	214
9*	2.5	6.3	12.5	25	63	125
40‡	2	5	10	20	50	100

* Exposure duration for school-aged children.
‡ Exposure duration for off-site workers.

The more populated areas near the BNSF Watson Railyard are located west and east/southeast of the railyard. Table V-2 presents the exposed population and area coverage size for various impacted zones of cancer risks. As indicated by Table V-2, the area with the greatest impacts has an estimated potential cancer risk of over 100 chances in a million, occurring at an area of about 110 acres right next to the railyard boundary, where about 1,000 residents live based on the 2000 U.S. Census Bureau's data. The impacted areas around the railyard property boundary with an estimated cancer risk of over 10 chances in a million are approximately 3,000 acres, with residents of about 21,000.

Table V-2: Impacted Areas and Exposed Population Estimated for the Diesel PM Emissions from the BNSF Watson Railyard

Estimated Cancer Risk (chances per million)	Impacted Area (acres)	Population Exposed
10 - 25	**2,110**	**12,600**
26 - 50	**560**	**5,000**
51 - 100	**240**	**3,200**
> 100	**110**	**1,000**

Individuals may be more sensitive to toxic exposures than the general population. These sensitive populations are identified as school-age children and seniors. The sensitive receptors include schools, hospitals, day-care centers and elder care facilities. There are 27 sensitive receptors within a one-mile distance from the BNSF Watson Railyard, including 6 child care centers, 8 schools, 9 elder care facilities, and 4 hospitals. Table V-3 shows the number of sensitive receptors in various levels of cancer risks associated with diesel PM emission from the BNSF Watson Railyard.

Table V-3: Estimated Number of Sensitive Receptors at Various Levels of Potential Cancer Risks Associated with the Diesel PM Emissions from the BNSF Watson Railyard

Estimated Cancer Risk (chances in a million)	Number of Sensitive Receptors
< 10	7
10 – 25	15
26 – 50	3
51 – 100	1
> 100	1

b) Non-Cancer Chronic Risk

The quantitative relationship between the amount of exposure to a substance and the incidence or occurrence of an adverse health impact is called the dose-response assessment. According to the OEHHA Guidelines (OEHHA, 2003), dose-response information for non-carcinogens is presented in the form of Reference Exposure Levels (RELs). OEHHA has developed chronic RELs for assessing non-cancer health impacts from long-term exposure.

A chronic REL is a concentration level, expressed in units of micrograms per cubic meter ($\mu g/m^3$) for inhalation exposure, at or below which no adverse health effects are anticipated following long-term exposure. Long-term exposure for these purposes has been defined as 12% of a lifetime, or about eight years for humans (OEHHA, 2003).

The methodology for developing chronic RELs is fundamentally the same as that used by U.S. EPA in developing the inhalation Reference Concentrations (RfCs) and oral Reference Doses (RfDs). Chronic RELs are frequently calculated by dividing the no observed adverse effect level (NOAEL) or lowest observed adverse effect levels (LOAEL) in human or animal studies by uncertainty factors (OEHHA, 2003).

A substantial number of epidemiologic studies have found a strong association between exposure to ambient particulate matter and adverse health effects. For diesel PM, OEHHA has determined a chronic REL at 5 $\mu g/m^3$, with the respiratory system as the hazard index target (OEHHA, 2003).

It should be emphasized that exceeding the chronic REL does not necessarily indicate that an adverse health impact will occur. 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., the very young, the elderly, pregnant women, and those with acute or chronic illnesses).

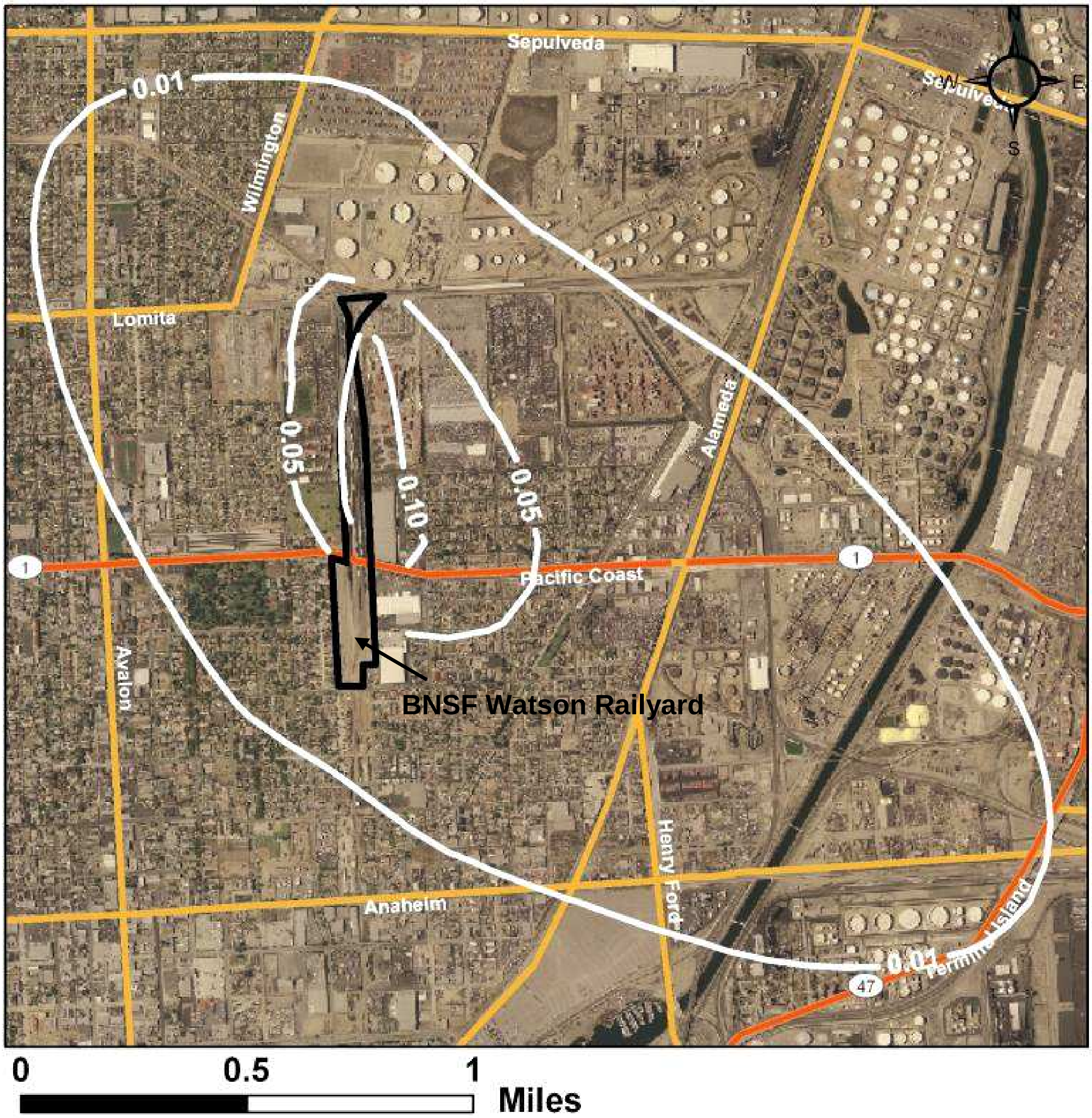
The significance of exceeding the REL is dependent on the seriousness of the health endpoint, the strength and interpretation of the health studies, the magnitude of combined safety factors, and other considerations (OEHHA, 2003).

It is important to note that Reference Exposure Level (REL) for diesel PM is essentially the U.S. EPA Reference Concentration first developed in the early 1990s based on histological changes in the lungs of rats. Since the identification of diesel PM as a Toxic Air Contaminant (TAC), California has evaluated the latest literature on particulate matter health effects to set the Ambient Air Quality Standard. Diesel PM is a component of particulate matter. Health effects from particulate matter in humans include illness and death from cardiovascular and respiratory disease, and exacerbation of asthma and other respiratory illnesses. Additionally, a body of literature has been published, largely after the identification of diesel PM as a TAC and adoption of the REL, which shows that diesel PM can enhance allergic responses in humans and animals. Thus, it should be noted that the REL does not reflect adverse impacts of particulate matter on cardiovascular and respiratory disease and deaths, exacerbation of asthma, and enhancement of allergic response.

The hazard index (HI) is then calculated by taking the annual average diesel PM concentration, and dividing by the chronic REL of 5 $\mu g/m^3$. An HI value of 1 or greater indicates an exceedance of the chronic REL, and some adverse health impact would be expected.

As part of this study, ARB staff conducted an analysis of the potential non-cancer health impacts associated with exposures to the model-predicted ambient levels of directly emitted diesel PM from on-site sources of the BNSF Watson Railyard. Figure V-2 presents the spatial distribution of non-cancer chronic risks by health hazard index isopleths ranging from 0.01 to 0.1 around the railyard facility. According to OEHHA Guidelines (OEHHA, 2003), these levels indicate that the potential non-cancer chronic public health risks are less likely to happen.

Figure V-2: Estimated Potential Non-Cancer Chronic Health Risks (Indicated as Hazard Indices) Associated with the Off-Site Diesel PM Emissions near the BNSF Watson Railyard



c) Non-Cancer Acute Risk

According to the OEHHA guidelines, an acute reference exposure level (REL) is an exposure that is not likely to cause adverse health effects in a human population, including sensitive subgroups, exposed to that concentration for the specified exposure duration (generally one hour) on an intermittent basis. Non-cancer acute risk characterization involves calculating the maximum potential health impacts based on short-term acute exposure and reference exposure levels. Non-cancer acute impacts for a single pollutant are estimated by calculating a hazard index.

Due to the uncertainties in the toxicological and epidemiological studies, diesel PM as a whole was not assigned a short-term acute REL. It is only specific compounds of diesel exhaust (e.g., acrolein) that independently have potential acute effects (such as irritation of the eyes and respiratory tract), and an assigned acute REL. However, acrolein is primarily used as a chemical intermediate in the manufacture of adhesives and paper. It has also been found as a byproduct of any burning process, such as fire, and tobacco smoke. Acrolein is a chemically reactive and unstable compound, and easily reacts with a variety of chemical compounds in the atmosphere. Compared to the other compounds in the diesel exhaust, the concentration of acrolein has a much lower chance of reaching a distant off-site receptor. More importantly, given the multitude of activities ongoing at facilities as complex as railyards, there are much higher levels of uncertainties associated with hourly-specific emission data and estimated maximum concentrations, which are essential to assess acute risk. Therefore, non-cancer acute risk is not addressed quantitatively in this study. From a risk management perspective, ARB staff believes it is reasonable to focus on diesel PM cancer risk because it is the predominant risk driver and the most effective parameter to evaluate risk reduction actions. Further, actions to reduce diesel PM will also reduce non-cancer risks.

2. Risk Characterization Associated with Off-Site Emissions

The ARB staff evaluated the health impacts from off-site diesel PM emissions within a one-mile distance from the BNSF Watson Railyard boundary. The estimated potential cancer risk levels associated with off-site diesel PM emissions are presented in Figure V-3. Table V-4 presents the exposed population and area coverage size for various impacted zones of cancer risks associated with off-site diesel PM emissions.

Similar to the railyard diesel PM emission dispersion pattern, the meteorological conditions resulted in a more dispersive pattern for the off-site diesel PM emissions southeast and northwest of the BNSF Watson Railyard boundary. The areas with cancer risk levels higher than 50 chances per million associated with off-site diesel PM emissions are within a half mile distance from the center of significant off-site diesel emission sources, encompassing approximately 1,300 acres. The land uses of these areas are mostly identified as industrial use, with about 1,400 residents living in these areas based on the 2000 U.S. Census Bureau's data. For comparison with the BNSF Watson Railyard health risks, the same level of potential cancer risks (above 50 chances in a million) associated with railyard diesel PM emissions covers about 350 acres with a population of approximately 4,200. The off-site diesel PM emission impacted residential areas near the BNSF Watson Railyard mostly have a cancer risk level between 10 to 25 chances per million. Total impacted area associated with off-site diesel PM emissions at these levels (10-25 chances in a million) is more than twice larger than that associated with diesel PM emissions from the BNSF Watson Railyard.

Table V-4: Impacted Areas and Exposed Population Estimated for the Off-Site Diesel PM Emissions around the BNSF Watson Railyard

Estimated Cancer Risk (cases per million)	Impacted Area (Acres)	Estimated Population Exposed
> 100	300	30
50 - 100	1,000	1,400
25 - 50	2,000	12,000
10 - 25	4,800	42,000

The potential non-cancer chronic health hazard indexes from off-site diesel PM emissions within a one-mile distance from the BNSF Watson Railyard boundary are estimated at a range from 0.01 to 0.1, as shown in Figure V-4. According to the OEHHA Health Risk Assessment Guidelines, these levels are considered to be insignificant for non-cancer public health risks.

Figure V-3: Estimated Potential Cancer Risks (Chances per Million) Associated with the Off-Site Diesel PM Emissions near the BNSF Watson Railyard

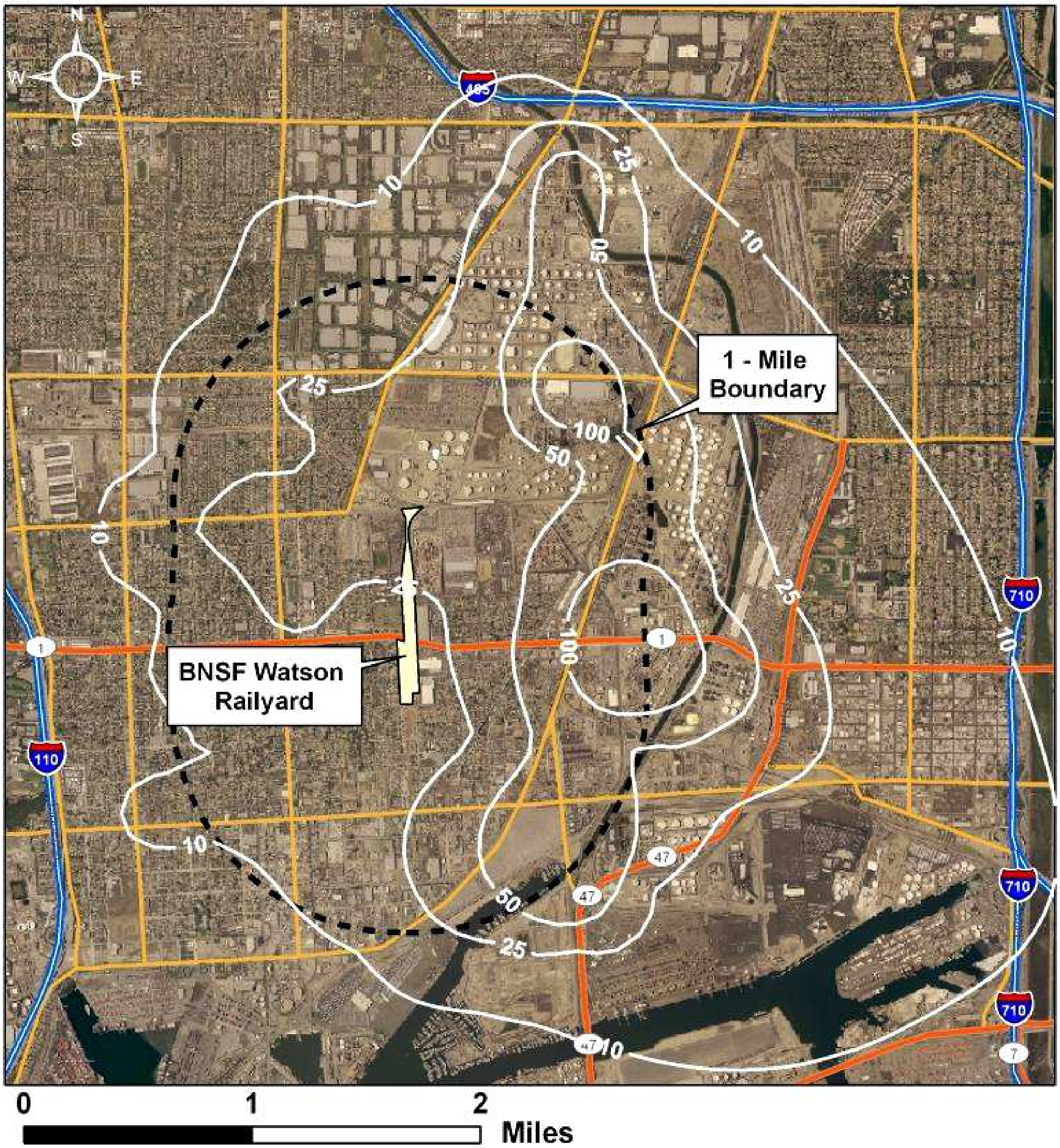


Figure V-4: Estimated Potential Non-Cancer Chronic Health Risks (Indicated as Hazard Indices) Associated with the Off-Site Diesel PM Emissions near the BNSF Watson Railyard

D. Uncertainty and Sensitivity of Health Risk Assessment

Risk assessment is a complex procedure which requires the integration of many variables and assumptions. The estimated diesel PM concentrations and risk levels produced by a risk assessment are based on several assumptions, many of which are designed to be health protective so that potential risks to individual are not underestimated.

As described previously, the health risk assessment consists of three components: (1) emission inventory, (2) air dispersion modeling, and (3) risk assessment. Each component has a certain degree of uncertainty associated with its estimation and prediction due to the assumptions made. Therefore, there are uncertainties and limitations with the results.

The following subsections describe the specific sources of uncertainties in each component. In combination, these various factors may result in potential uncertainties in the location and magnitude of predicted concentrations, as well as the potential health effects actually associated with a particular level of exposure.

1. Emission Inventory

The emission rate often is considered to be proportional to the type and magnitude of the activity at a source, e.g., the operation. Ideally, emissions from a source can be calculated on the basis of measured concentrations of the pollutant in the sources and emission strengths, e.g., a continuous emission monitor. This approach can be very costly and time consuming and is not often used for the emission estimation. Instead, emissions are usually estimated by the operation activities or fuel consumption and associated emission factors based on source tests.

The uncertainties of emission estimates may be attributed to many factors such as a lack of information for variability of locomotive engine type, throttle setting, level of maintenance, operation time, and emission factor estimates. Quantifying individual uncertainties is a complex process and may in itself introduce unpredictable uncertainties[4].

---

[4] The railyard HRAs have been performed using a methodology according to the ARB's and OEHHA Guidelines, and consistent with previous health risk analyses conducted by ARB. Similar to any model with estimations, the primary barriers of an HRA to determine objective probabilities are lack of adequate scientific understanding and more precise levels of data. Subjective probabilities are also not always available.

Tier-1 methodology is a conservative point approach but suitable for current the HRA's scope, given the condition and lack of probability data. Tier-1 approach used in the HRAs is consistent with previous health risk analyses performed by ARB, "The Roseville Railyard Study" and "Diesel PM Exposure Assessment Study for the Ports of Los Angeles and Long Beach". By recognizing associated uncertainties or variability, the HRAs have qualitatively discussed the limitation and caveats of possible underestimation and overestimation in emission inventory and modeling predictions because of assumptions and simplifications. The discussion provides an additional reference for HRA results even though quantitative uncertainty bounds are unavailable. Most importantly, it is not practical to characterize and quantify the uncertainty of estimated health risks without the support of robust scientific data and actual probability distribution functions of model variables. An attempt to incorporate subjective judgments on uncertainty analyses can lead to misinterpretation of HRA findings.

For locomotive sources at the BNSF Watson Railyard, the activity rates include primarily the number of engines in operation and the time spent in different power settings. The methodology used for the locomotive emissions is based on these facility-specific activity data. The number of engines operating in the facility is generally well-tallied by BNSF's electronic monitoring of locomotives entering and leaving the railyard. However, the monitoring under certain circumstances may produce duplicate readings that can result in overestimates of locomotive activity. In addition to recorded activity data, surveys and communications with facility personnel, and correlations from other existing data, (e.g., from the Roseville Railyard Study (ARB, 2004a)), all were used to verify the emission estimations in the emission inventory.

Uncertainties also exist in estimates of the engine time in mode. Idling is typically the most significant operational mode, but locomotive event recorder data could not distinguish when engine is on or off during periods when locomotive is in the idle notch. As a result, a professional judgment is applied to distinguish between these two modes. While the current operations may not be precisely known, control measures already being implemented are expected to result in reduced activity levels and lower emissions than are estimated here for future years.

As discussed previously, emission factors are often used for emission estimates according to different operating cycles. The Roseville Railyard Study (ARB, 2004a) developed representative diesel PM emission factors for locomotives in different duty cycles. To reduce the possible variability of locomotive population and the uncertainty from assumptions, the emission factors were updated in the study to cover a wide range of locomotive fleet in the State (see Appendix D). The fuel usage in the locomotives in 2005 was calculated from the BNSF's annual fuel consumption database. These critical updates for locomotive emission inventory have established the most representative locomotive emission factors for the study.

For non-locomotive emissions, uncertainty associated with vehicles and equipment at the railyard facility also exists because the duty cycles (i.e., engine load demanded) are less well characterized. Default estimates of the duty cycle parameters may not accurately reflect the typical duty demanded from these vehicles and equipment at any particular site. In addition, national and state regulations have targeted these sources for emission reductions. Implementation of these rules and fleet turnover to newer engines meeting more strict standards should significantly reduce emissions at these rail sites in future years. However, the effects of these regulations have not been incorporated in the emission estimates, so estimated emissions are greater than those expected for future years at the same activity level.

2. Air Dispersion Modeling

An air dispersion model is derived from atmospheric diffusion theory with assumptions or, alternatively, by solution of the atmospheric-diffusion equation assuming simplified forms of effective diffusivity. Within the limits of the simplifications involved in its derivation, the model-associated uncertainties are vulnerably propagated into its downstream applications.

Model uncertainty may stem from data gaps that are filled by the use of assumptions. Uncertainty is often considered as a measure of the incompleteness of one's knowledge or information about a variate whose true value could be established if a perfect measurement is available. The structure of mathematical models employed to represent scenarios and phenomena of interest is often a key source of model uncertainty, due to the fact that models are often only a simplified representation of a real-world system, such as the limitation of model formulation, the parameterization of complex processes, and the approximation of numerical calculations. These uncertainties are inherent and exclusively caused by the model's inability to represent a complex aerodynamic process. An air dispersion model usually uses simplified atmospheric conditions to simulate pollutant transport in the air, and these conditions become inputs to the models (e.g., the use of non site-specific meteorological data, uniform wind speed over the simulating domain, use of surface parameters for the meteorological station as opposed to the railyard, substitution of missing meteorological data, and simplified emission source representation). There are also other physical dynamics in the transport process, such as the small-scale turbulent flow in the air, which are not characterized by the air dispersion models. As a result of the simplified representation of real-world physics, deviations in pollutant concentrations predicted by the models may occur due to the introduced uncertainty sources.

The other type of uncertainty is referred as reducible uncertainty, a result of uncertainties associated with input parameters of the known conditions, which include source characteristics and meteorological inputs. However, the uncertainties in air dispersion models have been improved over the years because of better representations in the model structure. In 2006, the U.S. EPA modeling guidance was updated to replace the Industrial Source Complex model with AERMOD as a recommended regulatory air dispersion model for determining single source and source complex. Many updated formulations have been incorporated into the model structure from its predecessor, ISCST3, for better predictions from the air dispersion process. Nevertheless, quantifying overall uncertainty of model predictions is infeasible due to the associated uncertainties described above, and is beyond the scope of this study.

3. Risk Assessment

The toxicity of toxic air contaminants is often established by available epidemiological studies, or, where data from humans are not available, the use of data from animal studies. The diesel PM cancer potency factor is based on long-term study of railyard workers exposed to diesel exhaust at concentrations approximately ten times typical ambient exposures (OEHHA, 2003). The differences within human populations usually cannot be easily quantified and incorporated into risk assessments. The differences 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. In addition, the human population is much more diverse both genetically and culturally (e.g., lifestyle, diet) than inbred experimental animals. The variability among humans is expected to be much greater than in laboratory animals. Adjustment for tumors at multiple sites induced by some carcinogens could result in a higher potency. Other uncertainties arise (1) in the assumptions underlying the dose-response model used, and (2) in extrapolating from large experimental doses, where, for example, other toxic effects may compromise the assessment of carcinogenic potential due to much smaller environmental doses. Also, only single tumor sites induced by a substance are usually considered. When epidemiological data are used to generate a carcinogenic potency, less uncertainty is involved in the extrapolation from workplace exposures to environmental exposures. However, children, a subpopulation whose hematological, nervous, endocrine, and immune systems are still developing and who may be more sensitive to the effects of carcinogens on their developing systems, are not included in the worker population and risk estimates based on occupational epidemiological data are more uncertain for children than adults.

Human exposures to diesel PM are often based on limited availability of data and are mostly derived based on estimates of emissions and duration of exposure. Different epidemiological studies also suggest somewhat different levels of risk. When the Scientific Review Panel (SRP) identified diesel PM as a toxic air contaminant (ARB, 1998), the panel members endorsed a range of inhalation cancer potency factors (1.3×10^{-4} to 2.4×10^{-3} $(\mu g/m^3)^{-1}$) and a risk factor of 3×10^{-4} $(\mu g/m^3)^{-1}$, as a reasonable estimate of the unit risk. From the unit risk factor an inhalation cancer potency factor of 1.1 $(mg/kg\text{-}day)^{-1}$ can be calculated, which is used in the study. There are many epidemiological studies that support the finding that diesel exhaust exposure elevates relative risk for lung cancer. However, the quantification of each uncertainty applied in the estimate of cancer potency is very difficult and can be itself uncertain

This study adopts the standard Tier 1 approach recommended by the OEHHA for exposure and risk assessment. A Tier 1 approach is an end-point estimate methodology without the consideration of site-specific data distributions. It also assumes that an individual is exposed to an annual average concentration of a pollutant continuously for a specific time period. The OEHHA recommends the lifetime 70-year exposure duration with a 24-hour per day exposure be used for determining residential cancer risks. This will ensure a person residing in the vicinity of a facility for a lifetime will be included in the evaluation of risk posed by the facility. Lifetime 70-year exposure is a conservative estimate, but it is a historical benchmark for comparing facility impacts on receptors and for evaluating the effectiveness of air pollution control measures. Although it is not likely that most people will reside at a single residence for 70 years, it is common that people will spend their entire lives in a major urban area. While residing in urban areas, it is very possible to be exposed to the emissions of another facility at the next residence. In order to help ensure that people do not accumulate an excess unacceptable cancer risk from cumulative exposure to stationary facilities at multiple residences, the 70-year exposure duration is used for risk management decisions. However, if a facility is notifying the public regarding health risk, it is a useful indication for a person who has resided in his or her current residence less than 70 years to know that the calculated estimate of his or her cancer risk is less than that calculated for a 70-year risk (OEHHA, 2003). It is important that the risk estimates generated in this study not be interpreted as the expected rates of disease in the exposed population, but rather as estimates of potential risk. Risk assessment is best viewed as a comparative tool rather than a literal prediction of diesel incidence in a community.

Moreover, since the Tier-1 methodology is used in the study for the health risk assessment, the results have been limited to deterministic estimates based on conservative inputs. For example, an 80 percentile breathing rate approach is used to represent a 70-year lifetime inhalation that tends toward the high end for the general population. Moreover, the results based on the Tier-1 estimates do not provide an indication of the magnitude of uncertainty surrounding the quantities estimated, nor an insight into the key sources of underlying uncertainty.

REFERENCES

ARB, 1998. For the "Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant". April, 1998
http://www.arb.ca.gov/regact/diesltac/diesltac.htm

ARB, 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles, Staff Report, October, 2000.
http://www.arb.ca.gov/diesel/documents/rrpFinal.pdf

ARB, 2004a. Roseville Railyard Study, October, 2004.
http://www.arb.ca.gov/diesel/documents/rrstudy.htm

ARB, 2004b. ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk, March, 2004.
http://www.arb.ca.gov/toxics/harp/rmpolicyfaq.htm

ARB, 2005. ARB/Railroad Statewide Agreement: Particulate Emissions Reduction Program at the California Rail Yards. Sacramento, CA. June, 2005.
http://www.arb.ca.gov/railyard/ryagreement/ryagreement.htm

ARB, 2006a. Emission Reduction Plan for Ports and Goods Movement in California. March, 2006.
http://www.arb.ca.gov/planning/gmerp/gmerp.htm

ARB, 2006b. ARB Health Risk Assessment Guidance for Railyard and Intermodal Facilities. July, 2006.
http://www.arb.ca.gov/railyard/hra/hra.htm

ARB, 2006c. The California Almanac of Emission & Air Quality, 2006 edition.
http://www.arb.ca.gov/aqd/almanac/almanac06/almanac06iu.htm

ARB, 2006d. Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach, Finial Report. April, 2006.
ftp://ftp.arb.ca.gov/carbis/msprog/offroad/marinevess/documents/portstudy0406.pdf

ARB, 2006e. ARB Rail Yard Emissions Inventory Methodology. July, 2006.
http://www.arb.ca.gov/railyard/hra/hra.htm

ENVIRON, 2006a. Wilmington-Watson Railyard TAC Emission Inventory. Emeryville, CA. November, 2006.
http://www.arb.ca.gov/railyard/hra/hra.htm

ENVIRON, 2006b. Air Dispersion Modeling Assessment of Air Toxic Emissions from BNSF Watson Railyard, Report No. 06-12910J5B. Emeryville, CA. November, 2006.
http://www.arb.ca.gov/railyard/hra/hra.htm

ENVIRON, 2006c. Meteorological Data Selection and Processing Methodology for 2006 BNSF Designated Rail Yards. July, 2006
http://www.arb.ca.gov/railyard/hra/hra.htm

Krewski, D., Burnett, R.T., Goldberg, M.S., Hoover, K., Siemiatycki, J., Jarret, M., Abrahamowicz, M., White, W.H., Reanalysis of the Harvard Six Cities Study and the American Cancer Society Study of Particulate Air Pollution and Mortality, Special Report, Health Effects Institute, Cambridge, MA, 2000.

Lloyd, A.C., Cackette, T.A., 2001. Diesel Engines: Environmental Impact and Control. *Journal of Air & Waste Management Association,* 51, pp. 809-847*.*

OEHHA, 2000. Air Toxics Hot Spot Program Risk Assessment Guidelines: Part IV-Technical Support Document for Exposure Analysis and Stochastic Analysis. Office of Environmental Health Hazard Assessment. September, 2000.
http://www.oehha.ca.gov/air/hot_spots/finalStoc.html

OEHHA, 2002. Air Toxics Hot Spot Program Risk Assessment Guidelines: Part II-Technical Support Document for Describing Available Cancer Potency Factors. Office of Environmental Health Hazard Assessment. December, 2002.
http://www.oehha.ca.gov/air/hot_spots/pdf/TSDNov2002.pdf

OEHHA, 2003. 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. August, 2003.
http://www.oehha.ca.gov/air/hot_spots/hraguidefinal.html

Pope, C.A, III; Thun, M.J.; Namboodiri, M.M.; Dockery, D.W.; Evans, J.S.; Speizer, F.E.; Heath, J.C.W. Particulate Air Pollution as a Predictor of Mortality in a Prospective Study of U.S. Adults, *Am. J. Respir. Crit. Care. Med*. 1995, 151, 669-674.

Pope, C.A, III; Burnett, R.T., Thun, M.J.; Calle, E.E. Krewski, D., Ito, K., Thurston, G.D. Lung Cancer, Cardiopulmonary Mortality, and Long-Term Exposure to Fine Particulate Air Pollution, *J. Am. Med. Assoc*., 2002, 287, 1132-1141.

Pope, C.A, III; Burnett, R.T.; Thurston, G.D.; Thun, M.J.; Calle, E.E.; Krewski, D.; Godleski., J.J. 2004. Cardiovascular Mortality and Long-Term Exposure to Particulate Air Pollution: Epidemiological Evidence of General Pathophysiological Pathways of Disease, *Circulation,* **109**, pp. 71-77.

SCAQMD, 2000. Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-II), Final Report, March, 2000.
http://www.aqmd.gov/matesiidf/matestoc.htm

U.S. EPA, 2004a. User's Guide for the AMS/EPA Regulatory Model – AERMOD. Report No. EPA-454/B-03-001. Office of Air Quality Planning and Standards. Emissions Monitoring and Analysis Division, Research Triangle Park, NC. September, 2004.

U.S. EPA, 2004b. User's Guide for the AERMOD Meteorological Preprocessor. Report No. EPA-454/B-03-002. Office of Air Quality Planning and Standards. Emissions Monitoring and Analysis Division, Research Triangle Park, NC. September, 2004.

U.S. EPA, 2005. Federal Register, Part III, 40 CFR part 51, Vol. 70, No. 216, November 9, 2005.

This page intentionally left blank

APPENDIX A

METHODOLOGY FOR ESTIMATING OFF-SITE MOBILE SOURCE DIESEL PM EMISSIONS

Introduction:

This assessment includes on-road mobile emissions from all heavy duty diesel truck running exhaust as it is the primary source of diesel particulate emissions within the on-road vehicle fleet. Traditionally, on-road mobile emission inventories are generated at the county scale using California's emission factor model EMFAC and then allocated to large grid cells using the Direct Travel Impact Model (DTIM). To enhance the spatial resolution we have estimated emissions based on roadway specific vehicle activity data and allocated them to individual roadway links. All roadway links within a 2-mile buffer of the combined Commerce yards and all links within a 1-mile buffer of all other yards were included in this assessment.

As more and more work has been done to understand transportation modeling and forecasting, access to local scale vehicle activity data has increased. For example, the various Metropolitan Planning Organizations (MPOs) are mandated by the Federal government to maintain a regional transportation plan and regional transportation improvement plan. These reports assess the impact the travel growth and assess various transportation improvement plans [1]. Planning is based on travel activity results from Transportation Demand Models (TDMs) that forecast traffic volumes and other characteristics of the transportation system. Currently, more than a dozen MPOs as well as the California Department of Transportation (Caltrans) maintain transportation demand models. Through a system of mathematical equations TDMs estimate vehicle population and activity estimates such as speed and vehicle miles traveled (VMT) based on data about population, employment, surveys, income, roadway and transit networks and transportation costs. The activity is then assigned a spatial and temporal distribution by allocating them to roadway links and time periods. A roadway link is defined as a discrete section of roadway with unique estimates for the fleet specific population and average speed and is classified as a freeway, ramp, major arterial, minor arterial, collector, or centroid connector. Link based emission inventory development utilizes these enhanced spatial data and fleet and pollutant specific emission factors to estimate emissions at the neighborhood scale.

Methodology:

Estimating emissions from on-road mobile sources outside the rail yards was broken into four main processes and described below. The first step involves gathering vehicle activity data specific to each link on the roadway network. Each link contains 24 hours worth of activity data including vehicle miles traveled, vehicle type, and speed. The activity is then apportioned to the various heavy duty diesel truck types (Table A-1) where speed-specific VMT is then matched to an emission factor from EMFAC to estimate total emissions from each vehicle type for each hour of the day. The working draft of EMFAC (version V2.23.7), rather than EMFAC2007, was used for this assessment because at the time this project was underway EMFAC2007 was not completed. The working draft of EMFAC (version V2.23.7), however, contains nearly all the revisions in EMFAC2007 that would affect these calculations.

Table A-1: Heavy Duty Truck Categories

Class	Description	Weight (GVW)	Abbreviation	Technology Group
T4	**Light-Heavy Duty Diesel Trucks**	8,501-10,000	LHDDT1	DIESEL
T5	**Light-Heavy Duty Diesel Trucks**	10,001-14,000	LHDDT2	DIESEL
T6	**Medium-Heavy Duty Diesel Trucks**	14,001-33,000	MHDDT	DIESEL
T7	**Heavy-Heavy Duty Diesel Trucks**	33,001+	HHDDT	DIESEL

Step 1: Obtain Link-Specific Activity Data

The link specific activity data for heavy duty trucks necessary to estimate emissions are speed and vehicle miles traveled (VMT), where VMT is a product of vehicle volume (population) and link length. Link activity for Ventura, Los Angeles, Orange, and more than 90% of Riverside and San Bernardino counties are provided by the Southern California Association of Governments (SCAG) Heavy Duty Truck Transportation Demand Model. Heavy duty truck activity is modeled using truck specific data, commodity flows and goods movement data. SCAG, however, is the only MPO with a heavy duty truck model. The remaining counties under the rail yard study are covered by the Integrated Transportation Network (ITN) developed by Alpine Geophysics [2]. The Integrated Transportation Network was developed by stitching together MPO transportation networks and the Caltrans statewide transportation network. Link specific truck activity from the ITN is estimated as a fraction of the total traffic on the links and is based on the fraction of trucks within each county as it is estimated in EMFAC.

The product of truck volume and link length is referred to as vehicle miles traveled (VMT) and has units of miles. Transportation demand models provide total VMT for each link without further classification into the various heavy duty truck weight and fuel type classifications. Therefore, in order to assess the emissions only from heavy duty diesel trucks the total heavy duty truck VMT is multiplied by the fraction of trucks that are diesel. Once the total diesel VMT is calculated the heavy duty truck diesel VMT is multiplied by the fraction of trucks that make up the four weight classifications. The fuel and weight fractions are specific to each county and are derived from total VMT for each weight and fuel class in EMFAC for each county. The data is then compiled into an activity matrix (Table A-2) composed of a link identification code, hour of the day, speed, light heavy duty diesel 1 truck (LHDDT1) VMT, light heavy duty diesel 2 truck (LHDDT2) VMT, medium heavy duty diesel truck (MHDDT) VMT, and heavy heavy duty diesel truck (HHDDT) VMT.

Table A-2: Activity Matrix Example

LINKID	Hour	Speed (mph)	LHDDT1 VMT (miles)	LHDDT2 VMT (miles)	MHDDT VMT (miles)	HHDDT VMT (miles)
49761	12	45	0.37	0.48	3.17	5.51
49761	**3**	**45**	0.14	0.18	1.16	**2.00**
49761	3	35	0.16	0.21	1.37	2.38
50234	4	55	0.19	0.26	1.68	2.92

Step 2: Derive Gram per Mile Emission Factors

The second step of the emission inventory process involves developing emission factors for all source categories for a specified time period, emission type, and pollutant. Running exhaust emission factors based on vehicle type, fuel type and speed were developed from the Emfac mode of EMFAC. These are composite emission factors based on the model year distribution for each county and provided in units of grams of emissions per mile traveled. Emission factors are based on test cycles that reflect typical driving patterns, and non-extended idling is included.

Finally, a matrix of emission factors by speed and vehicle type was assembled for each county for light heavy-duty diesel trucks 1 and 2 (LHDDT1 and LHDDT2), medium heavy-duty diesel trucks (MHDDT) and heavy heavy-duty diesel trucks (HHDDT). The following is an example of such a matrix (Table A-3):

Table A-3: Emission Factor Matrix Example

	Diesel PM Emission Factors (g/mile)			
Speed (mph)	**LHD1** DSL	**LHD2** DSL	**MHD** DSL	**HHD** DSL
12	0.101	0.145	0.631	2.371
20	0.072	0.105	0.455	1.277
45	0.037	0.054	0.235	**0.728**
60	0.033	0.047	0.206	1.095

Step 3: Calculate Emissions

Diesel particulate matter (DPM) emission factors are provided as grams per mile specific to each speed and heavy duty truck type (see table above). To estimate emissions the activity for each diesel heavy duty truck type was matched to the corresponding emission factor (EF). For example, a 0.25 mile long link at 3 am in the morning has 8 heavy heavy-duty diesel trucks (HHDDTs) traveling at 45 miles per hour. This equates to a VMT of 2.00 miles (8 trucks*0.25 miles). EMFAC has provided a gram per mile emission factor for HHDDT traveling at 45 mph in Los Angeles County as 0.728 grams DPM/mile. In order to estimate total emissions from HHDDTs on that link during that hour of the day the following calculation is made:

$$TotalEmissions(\,grams\,) = EF \cdot (Volume \cdot LinkLength\,) = EF \cdot VMT$$

$$TotalEmissions(\,grams\,) = EF \cdot VMT = 0.728\frac{grams}{mile} \cdot 2.00miles = 1.45grams$$

The steps outlined above and in Steps 1 and 2 can be represented with this single equation that provides an emissions total for each link for each hour of the day.

$$Emissions = VMT_{link} \cdot \sum_{i,j} Fraction_{i,j} \cdot EF_{i,j}$$

where

- Emissions – the total emissions in grams for each link
- i = represents the individual diesel heavy duty truck types (LHDDT1, LHDDT2 – light heavy duty diesel trucks 1 and 2; MHDDT – medium heavy duty diesel truck; and HHDDT – heavy heavy duty diesel truck)
- j – represent the hours of the day (hours 1-24)
- VMT_{Link} - total VMT for that link for all heavy duty trucks (gasoline and diesel)
- Fraction = the fraction of the VMT that is attributable to each diesel heavy duty truck type The fraction is estimated based on VMT estimates in EMFAC: Example: $VMT_{MHDDT}/VMT_{\text{all heavy duty trucks (gasoline \& diesel)}}$
- EF = the heavy duty diesel truck emission factors. The emission factor is vehicle type and speed specific and is thus matched according to the link specific activity parameters.

From this expression diesel particulate matter emissions are provided for each link and for each hour of the day. Finally, emissions are summed for all links for all hours of the day to provide a total daily emission inventory.

Step 4: QA/QC – Quality Assurance/Quality Control

To assure that the total emissions were calculated correctly the total emissions (grams) were divided by the total diesel VMT to estimate a composite diesel gram per mile emission factor. This back-calculated emission factor was checked against emission factors in EMFAC. In addition, where possible, heavy duty truck gate counts provided for the rail yards were checked against traffic volumes on the links residing by the gates.

Limitations and Caveats

We have made several important assumptions in developing this inventory. While these assumptions are appropriate at the county level they may be less appropriate for the particular areas modeled in this assessment. For example, the county specific default model year distribution within EMFAC, and vehicle type VMT fractions were assumed to be applicable for all links within the domain modeled. In the vicinity of significant heavy heavy-duty truck trip generators it is reasonable to expect that surrounding links will also have higher heavy heavy-duty truck fractions. In these cases using EMFAC county vehicle mix fractions may underestimate the total diesel particulate emissions from on-road heavy duty trucks. In this inventory EMFAC county defaults were employed as there is insufficient data available to assess the vehicle mix fractions surrounding the railyards.

Travel demand model results are checked by comparing actual traffic counts on links where the majority of vehicle travel takes place. Therefore, there will be greater uncertainty associated with activity from minor arterials, collectors, and centroid connectors than from higher volume freeways. Data based strictly on actual traffic counts for each street would provide better activity estimates, but unfortunately very little data is available for such an analysis. While links representing freeways are accurately allocated spatially, the allocation of neighborhood streets and other minor roads are not as well represented.

The emissions inventory developed for this study only included diesel particulate matter emissions from running exhaust as it is the primary diesel source from on-road mobile sources. Emissions from other modes such as off-road equipment, extended idling, starts, and off-road equipment outside the rail yards were excluded. Vehicle activity on roadways outside of distribution centers, railyards, and ports, however, are included as they are captured on the roadway network by the travel demand models.

REFERENCES

[1] SCAG Transportation Modeling, http://www.scag.ca.gov/modeling/ [Accessed January 2007].
[2] Wilkinson, James (Alpine Geophysics); et al. "Development of the California Integrated Transportation Network (ITN)," Alpine Geophysics – Atmospheric and Hydrologic Sciences, La Honda, CA (2004).
http://www.arb.ca.gov/airways/CCOS/docs/III3_0402_Jun06_fr.pdf

APPENDIX B

METHODOLOGY FOR ESTIMATION OFF-SITE SATIONARY SOURCE DIESEL PM EMISSIONS

Emissions from off-site stationary source facilities were identified using the California Emission Inventory Development and Reporting System (CEIDARS) database, which contains information reported by the local air districts for stationary sources within their jurisdiction.

Geographic information system (GIS) mapping tools were used to create a one-mile buffer zone outside the property boundary footprint reported for each railyard. The CEIDARS facilities whose latitude/longitude coordinates fell within the one-mile buffer zone were selected.

The reported criteria pollutants in CEIDARS include carbon monoxide, nitrogen oxides, sulfur oxides, total organic gases, and particulate matter (PM). The reported toxic pollutants include the substances and facilities covered by the Air Toxics "Hot Spots" (AB 2588) program. Diesel exhaust particulate matter (diesel PM) was estimated from stationary internal combustion (IC) engines burning diesel fuel, operating at stationary sources reported in CEIDARS. Diesel PM emissions were derived from the reported criteria pollutant PM that is ten microns or less in diameter (criteria pollutant PM10) emitted from these engines. In a few cases, diesel exhaust PM was reported explicitly under the "Hot Spots" reporting provisions as a toxic pollutant, but generally the criteria pollutant PM10 reported at diesel IC engines was more comprehensive than the toxics inventory, and was therefore the primary source of data regarding diesel PM emissions.

The CEIDARS emissions represent annual average emission totals from routine operations at stationary sources. For the current analysis, the annual emissions were converted to grams per second, as required for modeling inputs for cancer and chronic non-cancer risk evaluation, by assuming uniform temporal operation during the year. (The available, reported emission data for acute, maximum hourly operations were insufficient to support estimation of acute, maximum hour exposures).

The CEIDARS 2004 database year was used to provide the most recent data available for stationary sources. Data for emissions, location coordinates, and stack/release characteristics were taken from data reported by the local air districts in the 2004 CEIDARS database wherever available. However, because microscale modeling requires extensive information at the detailed device and stack level that has not been routinely reported, historically, by many air districts, much of the stack/release information is not in CEIDARS. Gaps in the reported data were addressed in the following ways. Where latitude/longitude coordinates were not reported for the stack/release locations, prior year databases were first searched for valid coordinates, which provided some additional data. If no other data were available, then the coordinates reported for the overall facility were applied to the stack locations. Where parameters were not complete for the stack/release characteristics (i.e., height, diameter, gas temperature and velocity), prior year databases were first searched for valid data. If no reported parameters were available, then U.S. EPA stack defaults from the Emissions Modeling System for Hazardous Air Pollutants (EMS-HAP) program were assigned. The U.S. EPA stack defaults are assigned based on the Source Classification Code (SCC) or Standard Industrial Classification (SIC) code of the operation. If an applicable U.S. EPA default was not available, then a final generic default was applied. To ensure that the microscale modeling results would be health-protective, the generic release parameters assumed relatively low height and buoyancy. Two generic defaults were used. First, if the emitting process was identifiable as a vent or other fugitive-type release, the default parameters assigned were a height of five feet, diameter of two feet, temperature of 100 degrees Fahrenheit, and velocity of 25 feet per second. For all remaining unspecified and unassigned releases, the final generic default parameters assigned were a height of twenty feet, diameter of two feet, temperature of 100 degrees Fahrenheit, and velocity of 25 feet per second. All English units used in the CEIDARS database were converted to metric units for use in the microscale modeling input files.

This page intentionally left blank

APPENDIX C

METHODOLOGY FOR THE AIR DISPERSION MODELING OF OFF-SITE DIESEL PM EMISSIONS

Impacts from off-site pollution sources near the BNSF Watson rail yard facility were modeled using the U.S. EPA-approved AERMOD dispersion model. Specifically, off-site mobile and stationary diesel PM (DPM) emission sources located out to a distance of one mile from the perimeter of the BNSF Watson rail yard were included. Other emission sources that were located immediately beyond the one mile zone from the facility, such as a high-volume freeway, have the potential to impact receptors in the modeling grid, but were not considered.

To facilitate modeling of these off-site emission sources, the information summarized in Table A-4 was provided by external sources.

Table A-4: Data Provided by Others for Off-Site Emission Source Modeling.

Type of Data	Description	Data Source
Emission Estimates	Off-site DPM emissions for 2005 Mobile Sources: 3.2 TPY DPM Stationary Sources: 1.4 TPY DPM	PTSD/MSAB
Receptor Grid	26x29 Cartesian grid covering 175 km^2 with uniform spacing of 500 meters. Grid origin: (377600, 3733000) in UTM Zone 11.	Environ
Meteorological Data	AERMET-Processed data for 2005-2006 *Surface*: St. Peter and Paul School and Long Beach Daugherty Field *Upper Air*: San Diego Miramar	Environ
Surface Data	Albedo: 0.15 to 0.20 Bowen Ratio: 0.84 to 2.56 Surface Roughness: 0.71 to 0.94	Environ

The spatial and temporal emissions provided for these sources were converted into the appropriate AERMOD ready files. The off-site emissions were modeled using the same coarse receptor grid and meteorological data used by the consultants for their rail yard model runs, as indicated in the table above.

Figure A-1: Region Surrounding the BNSF Watson Railyard with the Modeling Domain Indicated by the Black Outline.

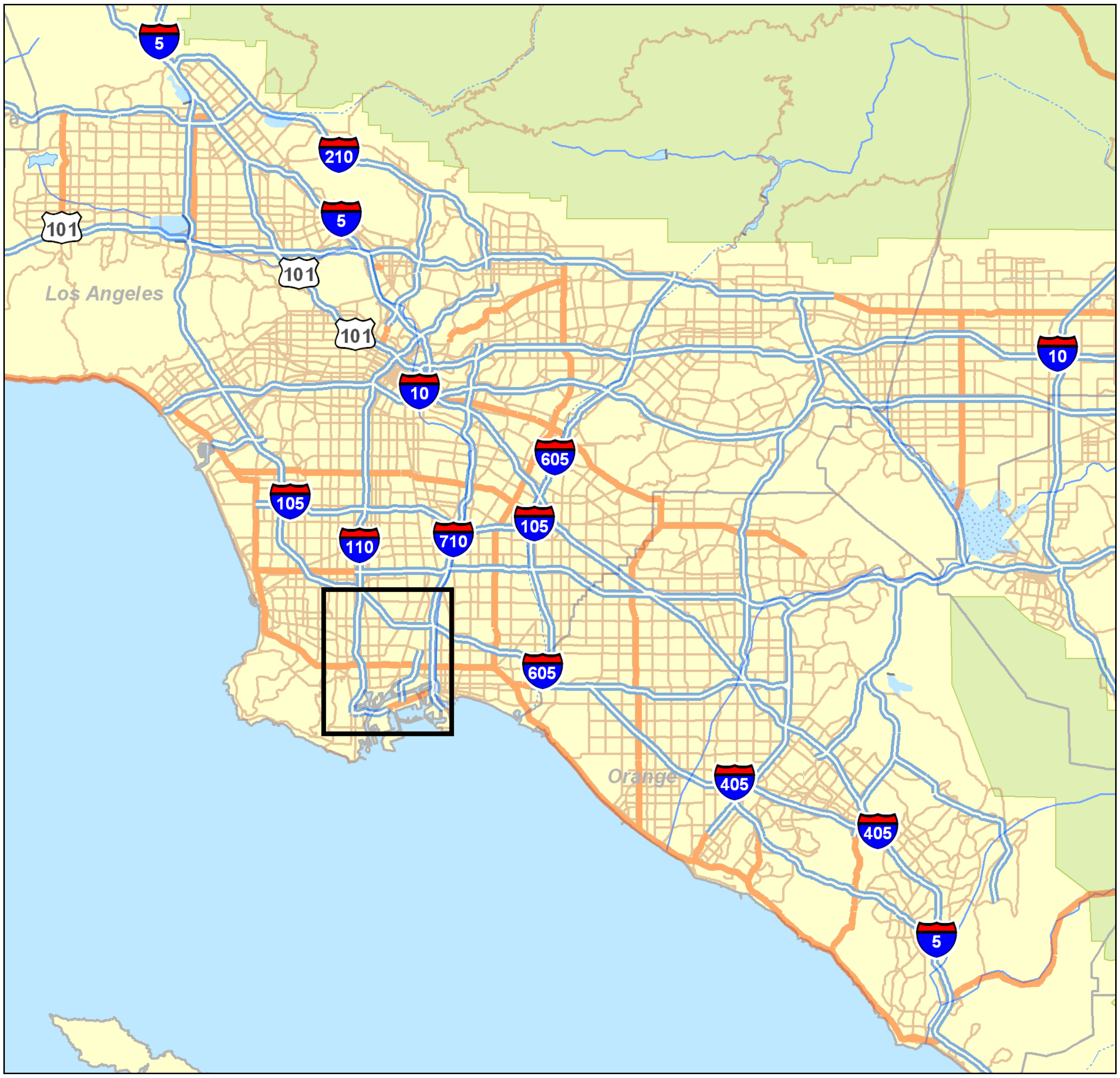
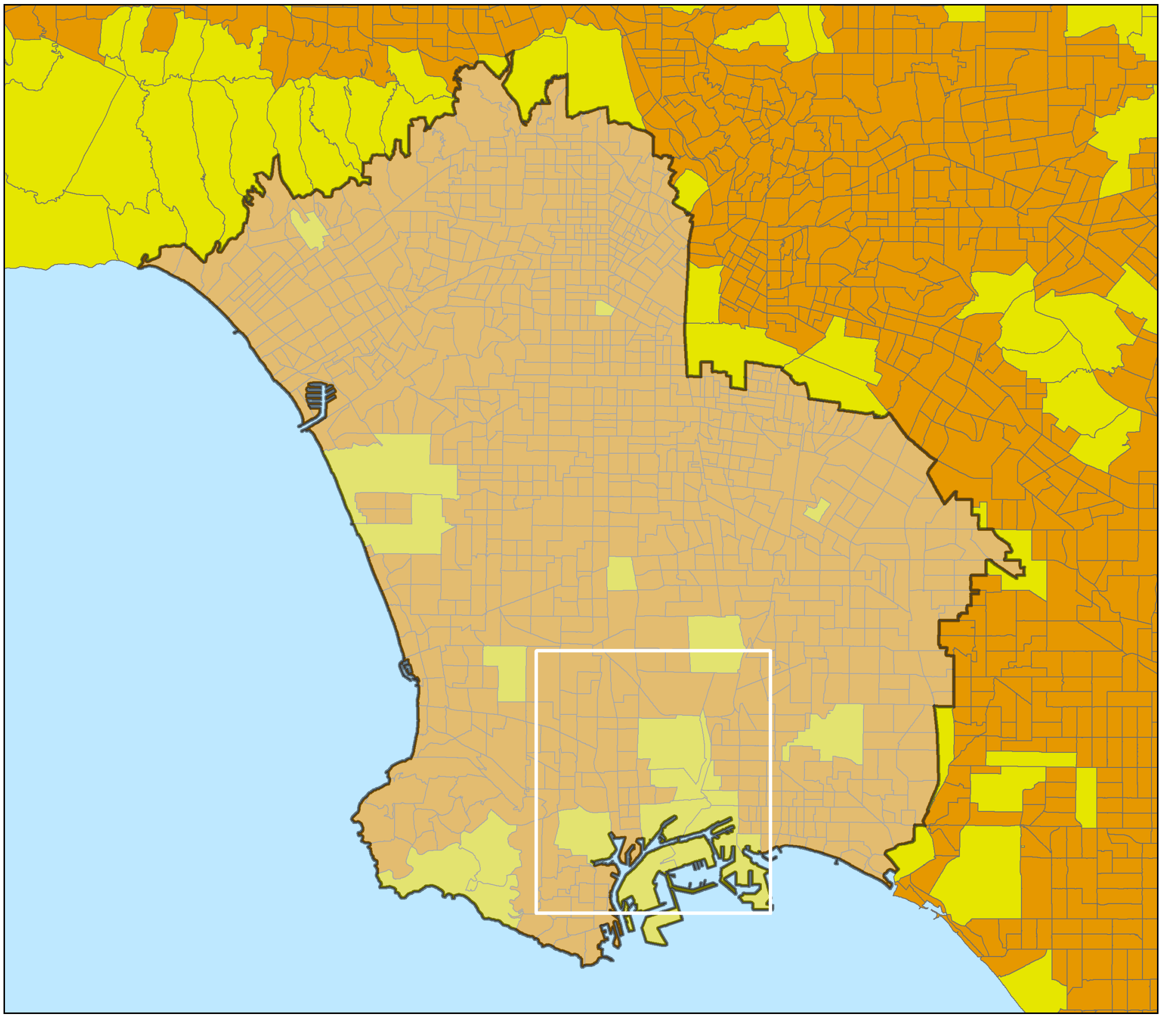


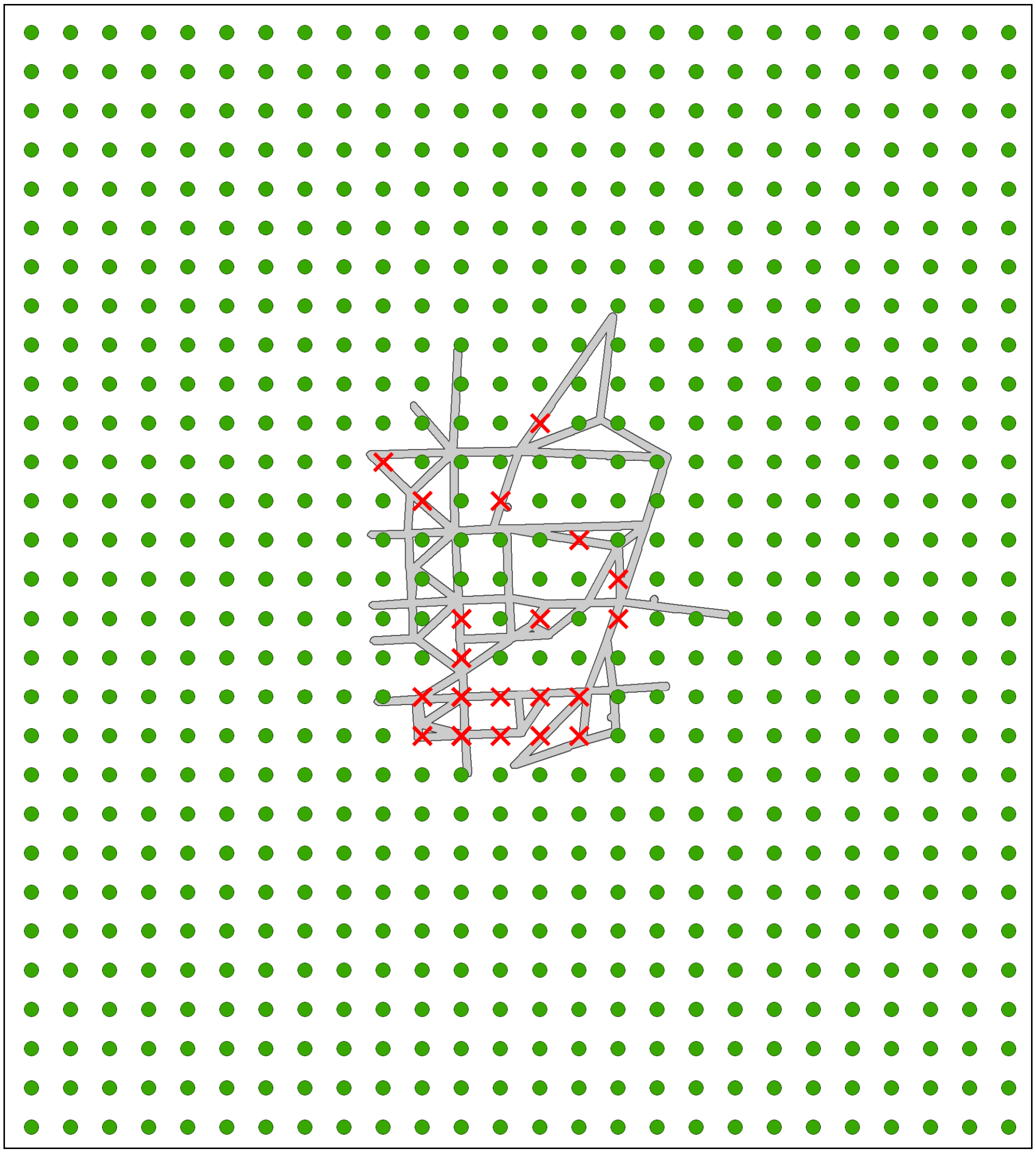
Figure A-1 illustrates the region surrounding the BNSF Watson modeling domain. The domain has dimensions 12.5 km x 14 km and contains a grid of 754 receptors with a 500 meter uniform grid spacing.

Figure A-2: BNSF Watson Railyard Urban Population
Orange denotes areas with at least 750 people/km^2. The highlighted region is the contiguous urban area used for modeling purposes.



AERMOD requires an estimate of the urban population for urban source modeling. The urban population parameter was determined by estimating the area of continuous urban features as defined by the model guidelines (AERMOD Implementation Guide September 27, 2005). According to the guidelines, areas with a population of at least 750 people per square kilometer are considered urban. The BNSF Watson model domain is in a region with considerable urbanization. The continuous urban area selected can be seen in Figure A-2. The population in this selected area is 4,528,035.

Figure A-3: BNSF Watson Railyard Receptor Network including Off-Site Sources and Railyard Facility



The off-site stationary and on-road emission sources used in the BNSF Watson model runs are plotted along with the receptor network in Figure A-3. These sources do not represent all stationary and roadway sources within the domain, but rather a subset made up of those roadways and facilities within one mile of the perimeter of the rail yard facility. Diesel PM off-site emissions used in the off-site modeling runs consisted of 3.2 tons per year from roadways and 1.4 tons per year from stationary facilities, representing emissions for 2005. Roadway emissions were simulated as AERMOD area sources with an aspect ratio of no greater than 100 to 1, with a width of 7.3 meters and a release height of 4.15 meters.

As indicated above, Figure A-3 illustrates a 12.5 km x 14 km gridded receptor field with uniform 500 meter spacing of receptors that are plotted as "●". Because a uniform grid sometimes places receptors on a roadway, those within 35 meters of a roadway were omitted. The basis for this is that these receptors are likely to fall on the roadway surface, versus a dwelling or workplace, and have high model-estimated concentrations, which could skew average concentration isopleths. Locations where receptors were removed are displayed as an "**x**" in Figure A-3. After removal, 734 of the original 754 receptors remained.

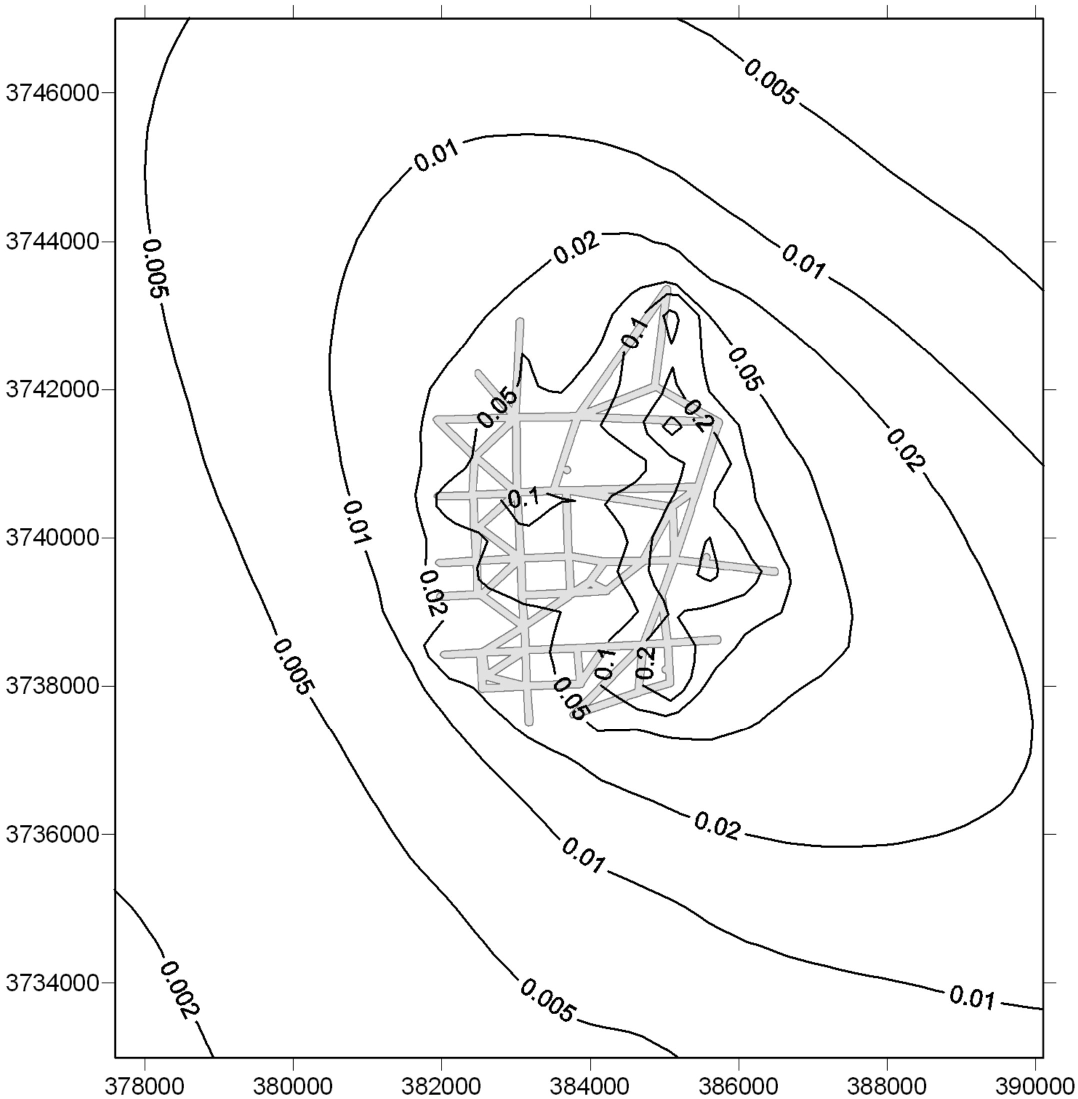
The same meteorological data used by Environ was used for the off-site modeling runs. The data were compiled by Environ from the nearby St. Peter and Paul School (33.78°N, 118.27°W) and Long Beach Daugherty Field (33.828°N, 118.163°W) stations. Upper air data for the same time period was obtained from the San Diego Miramar upper air station (32.833°N, 117.117°W). The model runs used one year of meteorological data from July 2005 through June 2006.

Figure A-4 shows annual average diesel PM concentrations from the off-site emissions. Highest values occur near major freeways; the five highest concentrations at a receptor and their locations are provided in Table A-5.

Table A-5: BNSF Watson Maximum Annual Concentrations in ug/m^3

X	Y	Mobile	Stationary	Total (Off-site)
385100	3741500	0.065	0.548	0.613
385600	3739500	0.089	0.494	0.583
385600	3740000	0.083	0.427	0.510
385600	3741000	0.283	0.059	0.342
385100	3738500	0.290	0.028	0.317

Figure A-4: BNSF Watson Railyard Off-Site Sources and Railyard with Modeled Annual Average Concentrations from Off-Site Sources in ug/m^3



This page intentionally left blank

APPENDIX D

TABLE OF LOCOMOTIVE DIESEL PM EMISSION FACTORS

Table A-6: Locomotive Diesel PM Emission Factors (g/hr)

Model Group	Tier	Throttle Setting										Source[1]
		Idle	DB	N1	N2	N3	N4	N5	N6	N7	N8	
Switcher	N	31.0	56.0	23.0	76.0	131.8	146.1	181.5	283.2	324.4	420.7	ARB and ENVIRON
GP-3x	N	38.0	72.0	31.0	110.0	177.7	194.8	241.2	383.4	435.3	570.9	ARB and ENVIRON
GP-4x	N	47.9	80.0	35.7	134.3	216.2	237.5	303.5	507.4	600.4	771.2	ARB and ENVIRON
GP-50	N	26.0	64.1	51.3	142.5	288.0	285.9	355.8	610.4	681.9	871.2	ARB and ENVIRON
GP-60	N	48.6	98.5	48.7	131.7	271.7	275.1	338.9	593.7	699.1	884.2	ARB and ENVIRON
GP-60	0	21.1	25.4	37.6	75.5	228.7	323.6	467.7	666.4	1058.5	1239.3	KCS7332
SD-7x	N	24.0	4.8	41.0	65.7	149.8	223.4	290.0	344.6	446.8	553.3	ARB and ENVIRON
SD-7x	0	14.8	15.1	36.8	61.1	220.1	349.0	407.1	796.5	958.1	1038.3	ARB and ENVIRON
SD-7x	1	29.2	31.8	37.1	66.2	219.3	295.9	436.7	713.2	783.2	847.7	NS2630[3]
SD-7x	2	55.4	59.5	38.3	134.2	271.7	300.4	335.2	551.5	672.0	704.2	UP8353[3]
SD-90	0	61.1	108.5	50.1	99.1	255.9	423.7	561.6	329.3	258.2	933.6	EMD 16V265H
Dash 7	N	65.0	180.5	108.2	121.2	322.6	302.9	307.7	268.4	275.2	341.2	ARB and ENVIRON
Dash 8	0	37.0	147.5	86.0	133.1	261.5	271.0	304.1	334.9	383.6	499.7	ARB and ENVIRON
Dash 9	N	32.1	53.9	54.2	108.1	197.3	267.3	343.9	392.4	397.3	573.3	SWRI 2000
Dash 9	0	33.8	50.7	56.1	117.4	205.7	243.9	571.5	514.6	496.9	460.3	average of ARB & CN2508[1]
Dash 9	1	16.9	88.4	62.1	140.2	272.8	354.5	393.4	466.4	445.1	632.1	CSXT595[2]
Dash 9	2	7.7	42.0	69.3	145.8	273.0	337.4	376.0	375.1	419.6	493.5	BNSF 7736[2]
C60-A	0	71.0	83.9	68.6	78.6	277.9	234.1	276.0	311.4	228.0	362.7	ARB and ENVIRON

Notes:

1. Except as noted below, these emission rates were originally developed for the ARB Roseville Rail Yard Study (October 2004), and were subsequently adjusted based on an average fuel sulfur content of 0.11% by ENVIRON as part of the BNSF efforts for their analyses for the Railyard MOU (Personal communication from Chris Lindhjem to R. Ireson, 2006).
2. Emission rates added by ENVIRON based on data produced in the AAR/SwRI Exhaust Plume Study (Personal communication from Steve Fritz to C. Lindhjem, 2006)
3. SD-70 emission rates taken from data produced in the AAR/SwRI Exhaust Plume Study (Personal communication from Steve Fritz to R. Ireson, 2006)

APPENDIX E

METHODOLOGY FOR ESTIMATING DIESEL PM EMISSIONS FROM THE HHD TRUCKS TRAVELING BETWEEN THE INTERMODAL RAILYARDS AND MAJOR FREEWAYS

Introduction:

Diesel-fueled heavy-heavy-duty (HHD) trucks (weight >33,001 pounds) traveling between the intermodal railyards and major freeways generate certain amount of diesel PM emissions, which contribute the off-site diesel PM emissions. Using the same methodology in estimating the off-site HHD trucks diesel PM emissions, ARB staff estimated the diesel PM emissions of HHD trucks traveling between the railyard gates and the freeways. Estimate of the diesel PM emissions from HHD diesel trucks can be performed based on average speed on the local streets, distances traveled locally between the gates and the freeways, truck count at the railyard gates, and EMFAC model.

This analysis is conducted for the intermodal railyards whose diesel-fueled HHD trucks are a major contributor to the diesel PM emissions. At some railyards, HHD trucks also are idling or queuing outside of the railyards. These activities have been covered by the railyard on-site emission inventories and are not included in this analysis.

Methodology:

Estimating diesel PM emission from HHD diesel trucks can be performed by the following steps:

- Assume the average speed of trucks traveling on local streets between the railyard gates and the entrance/exit ramps of freeways.
- Select the most frequently traveled freeways for each railyard.
- Measure the distances from the gates to the ramps of selected freeways for each railyard using Google Earth Pro mapping tool.
- Use working draft of EMFAC model to obtain emission factor (gram per mile) associated with truck type, fuel use, and model year (as described in Appendix A: Methodology for Estimating Off-site Diesel PM Mobile Source Emissions).
- Calculate the associated diesel PM emissions.

Step 1: Assume average speed of trucks traveling between the railyard gates and the freeways

The speeds of HHD trucks traveling on local streets range from 5 mph (start from the gate) to 35 mph (enter the freeway) depending on the time of travel, traffic conditions, etc. ARB staff assumes these speeds are averaged at about 20 mph.

Step 2: Select the most frequently traveled freeways for each railyard

This step is based on the assumption that the truck traffic heavily concentrated on one freeway than the others. According to the judges from the railyard operators, ARB staff chose the most frequently traveled freeways for each intermodal railyard, as described in Table E-1.

Table E-1 The Most Frequently Traveled Freeways by Railyards and the Distances from the Railyard Gates to the Freeways

Railyards	Frequent Traveled Freeways	Roundtrip Distances from Gates to Freeways (miles)
UP Commerce	710	2.6
BNSF Hobart	710	2.6
BNSF Commerce/Eastern	I-5	2.1
UP LATC	I-5	0.7
UP Mira Loma	60	2.2
BNSF Richmond	580	1.74

Step 3: Measure the distances from the railyard gates to the ramps of selected freeways using Google Earth Pro mapping tool.

The distances of the local streets from the railyard gates to the entrance/exit ramps of the selected freeways are estimated by Google Earth Pro mapping tools. The results are presented in Table 1.

Step4: Utilize working EMFAC to obtain emission factor

The working draft of EMFAC, rather than EMFAC 2007 was used in the analysis as described in Appendix A. Emission factors based on vehicle type (in this case HHD diesel trucks), fuel type, and speed were developed by EMFAC. These are composite emission factors based on the model year distribution for each county and provided in units of grams of emissions per mile traveled. Finally, a matrix of emission factors by speed and vehicle type was assembled for each county for heavy heavy-duty diesel trucks. The following is an example of such a matrix (Table E-2).

Table E-2: Emission Factor of HHD for Matrix Example

Speed (mph)	HHD DSL EF (g/mi)
12	2.371
20	**1.277**
45	0.728
60	1.095

Step5: Calculate the HHD diesel PM emissions

The calculation of diesel PM emissions can be expressed by the following equation:

TotalEmission (grams) = EF X (Volume X DistanceTraveled)

EF represents diesel PM emission factor. The volume of trucks count at the railyard's gates was provided by the railyard operators.

The emissions inventory developed by this methodology only included diesel PM emissions from running exhaust as it is the primary diesel source from on-road mobile sources. Emissions from other modes such as idling, starts, and tire and break wear were excluded.

The results of the HHD Trucks diesel PM emissions while traveling between each intermodal railyards and major freeways are presented in Table E-3.

Table E-3: Estimated HHD Diesel PM Emissions from Gate to Freeway**

Railyard	Route	Distance (Miles)		Truck Trips per Day	Diesel PM	
		One way	Round Trip		g/day***	tpy
BNSF Hobart	*Gate to I-710**	1.3	2.6	3533	11,730	**4.72**
UP Commerce	*Gate to I-710**	1.3	2.6	1026	3,406	**1.37**
BNSF Commerce/Eastern	*Gate to I-5**	1.05	2.1	557	1,495	**0.60**
UP Mira Loma	*Gate to SR-60**	1.1	2.2	321	901	**0.36**
UP LATC	*Gate to I-5**	0.35	0.7	512	457	**0.18**
BNSF Richmond	*Gate to I-580**	0.87	1.74	153	314	**0.13**
	Total					**7.36**

Notes: * Assumed all trucks take this route

** Assumed all trucks' speeds are 20 mph from gate to freeway

*** HHD Emission Factors at 20 mph: 1.277 g/mi for LA County and 1.176 g/mi for Contra Costa County

APPENDIX F
SPATIAL ALLOCATIONS OF DIESEL PM EMISSIONS AT BNSF WATSON RAILYARD

Figure F-1 The BNSF Watson Railyard shown with shaded area accounting for about 95% of facility wide diesel PM emissions.

At the BNSF Watson Railyard, the about 95% of the emissions occur in the central part of the yard Almost all of the emissions at the BNSF Watson Railyard are from locomotive activity (either line haul or switchers) accounting for about 1.8 tons per year diesel PM emissions.

Figure F-2 BNSF Watson: Spatial allocation of Switcher emissions at BNSF Watson Railyard. (0.43 Tons per Year)

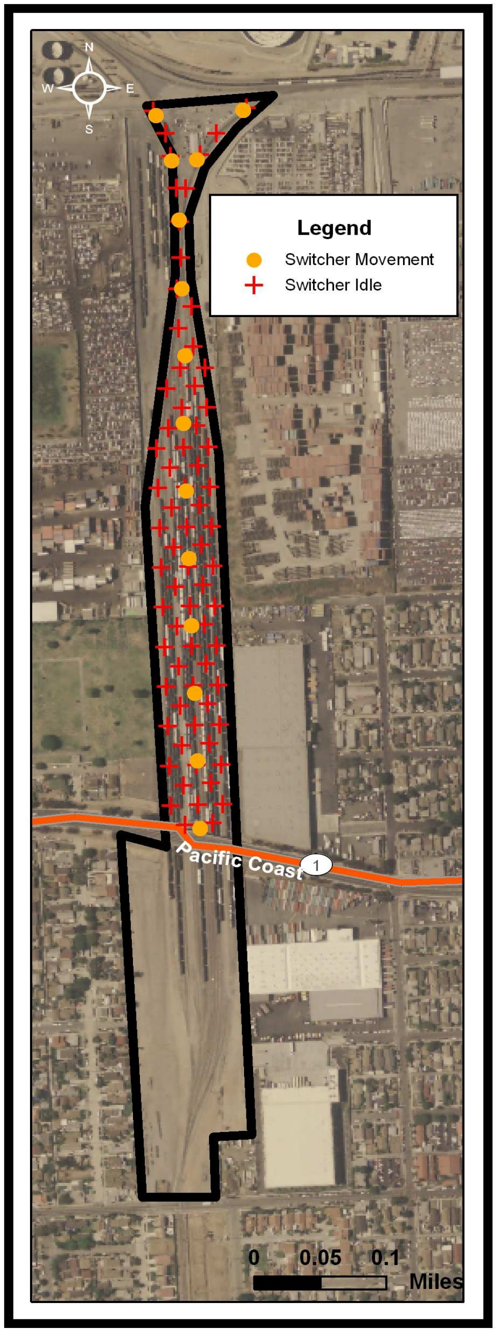


Figure F-3 Spatial allocation of Line Haul emissions at BNSF Watson Railyard. (1.39 Tons per Year)

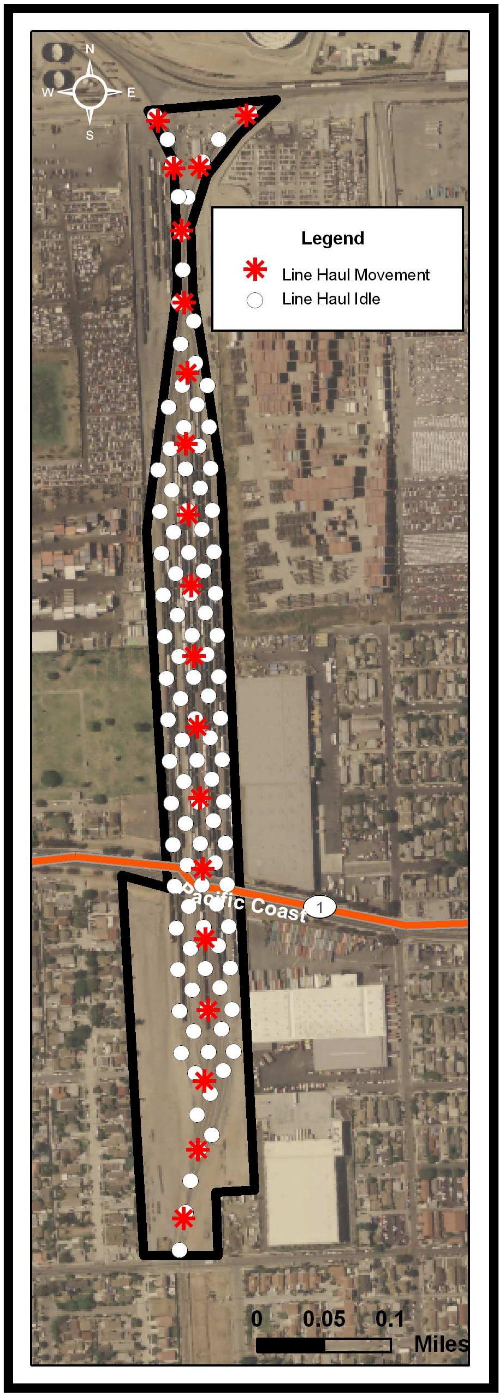
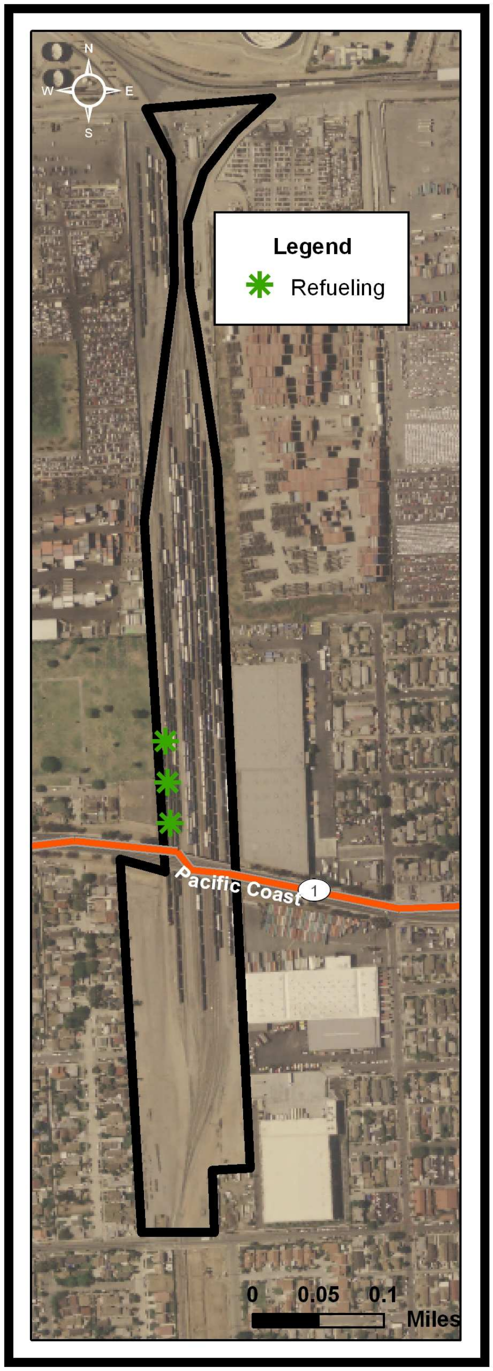


Figure F-4 BNSF Watson: Spatial allocation of re-fueling emissions at BNSF Watson Railyard. (0.06 Tons per Year)



APPENDIX G

AERMOD MODEL SENSITIVITY ANALYSIS OF METEOROLOGICAL DATA (ONE- VS. FIVE-YEAR DATA)

Figure G-1 AERMOD's Simulated Diesel PM Concentrations (due to On-site and Off-site Diesel PM Emissions) around UP Stockton Railyard Using One-year Meteorological Data..

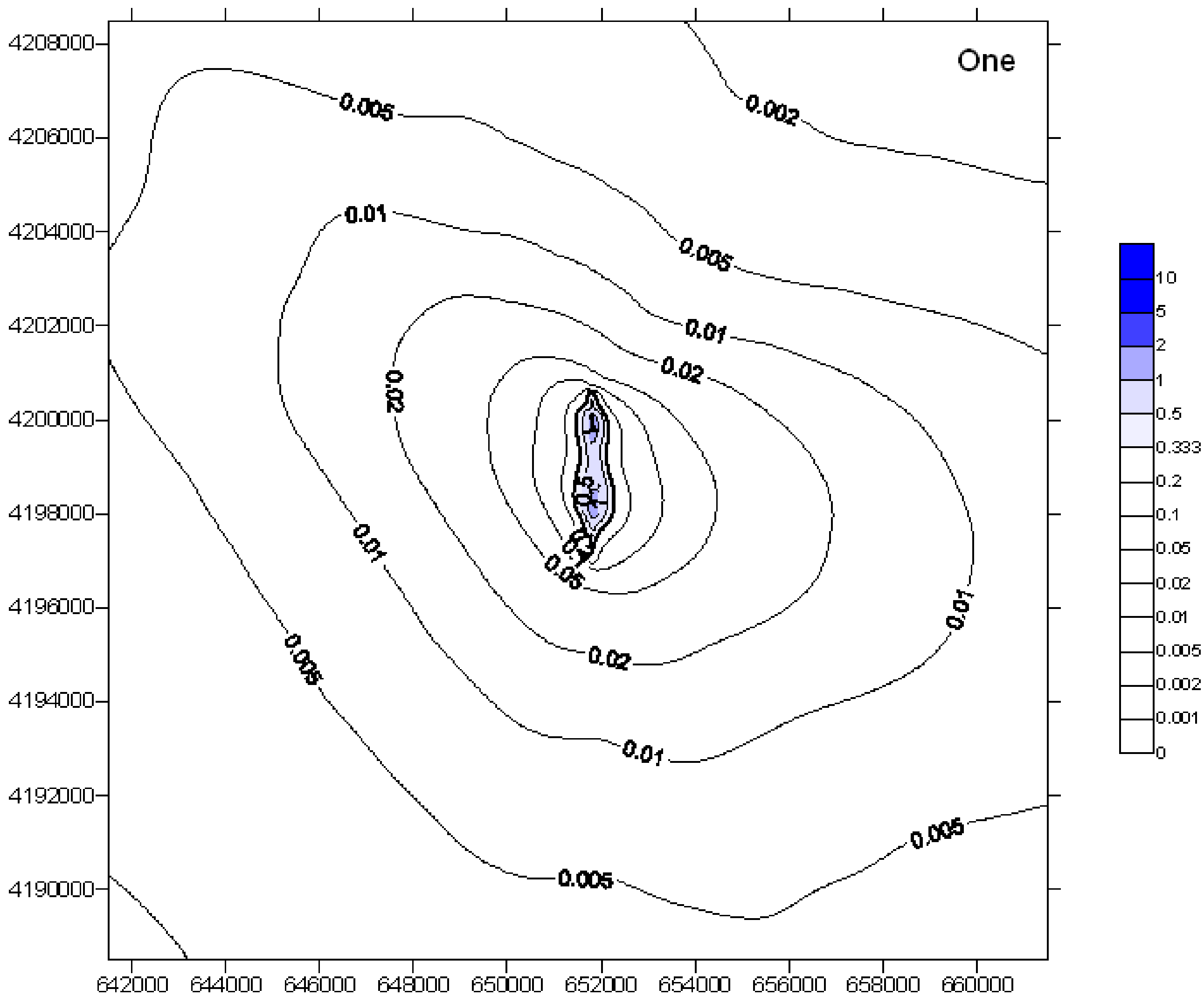


Figure G-2 AERMOD's Simulated Diesel PM Concentrations (due to On-site and Off-site Diesel PM Emissions) around UP Stockton Railyard Using Five-year Meteorological Data.