

**AIR DISPERSION MODELING ASSESSMENT OF
AIR TOXIC EMISSIONS FROM
BNSF COMMERCE/EASTERN INTERMODAL RAIL YARD**

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California Air Resources Board

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ACRONYMS

ARB	Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BNSF	BNSF Railway Company
BPIP-PRIME	Building Profile Input Program - Plume Rise Model Enhancement
CalEPA	California Environmental Protection Agency
CalOSHA	California Occupational Safety and Health Administration
CARDS	Comprehensive Aerological Reference Dataset
DPM	Diesel particulate matter
ENVIRON	ENVIRON International Corporation
GE	General Electric
GIS	Geographic Information Systems
HD	Heavy-duty
HRA	Health Risk Assessment
I	Interstate
ISC	Industrial Source Complex
IGRA	Integrated Global Radiosonde Archive
LD	Light-duty
MATES	Multiple Air Toxics Exposure Study
MOU	Memorandum of Understanding
MTBE	Methyl t-butyl ether
NAS	Naval Air Station
NCDC	National Climactic Data Center
NLCD	National Land Cover Data
NRC	National Research Council
NWS	National Weather Service
OEHHA	Office of Environmental Health Hazard Assessment
PM	Particulate matter
PMI	Point of maximum impact
POLA	Port of Los Angeles
POLB	Port of Long Beach
RAAC	Risk Assessment Advisory Committee
SCRAM	Support Center for Regulatory Atmospheric Modeling
TAC	Toxic Air Contaminant
ULSD	Ultra low sulfur diesel
UPPR	Union Pacific Railroad Company

USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
VMT	Vehicle miles traveled
WBAN	Weather Bureau Army Navy

ABBREVIATIONS

%	percent
AERMAP	AERMOD Terrain Processor
AERMET	AERMOD Meteorological Preprocessor
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
COOP	Cooperative Station (NWS)
kg	kilogram
km	Kilometer
L	liter
m ³	cubic meter
µg	microgram

1.0 INTRODUCTION

In June 2005, BNSF Railway Company (BNSF) and Union Pacific Railroad Company (UPRR) entered into a mutual agreement (ARB/Railroad Statewide Agreement, 2005b or the "Agreement") with the California Air Resources Board (ARB) to reduce particulate emissions from their respective rail yards that are owned and operated within the State of California. Under provisions of the Agreement, ARB staff will be performing Health Risk Assessments (HRAs) at 17 rail yards ("Designated Rail Yards") within California. The HRAs will consider emissions of toxic air contaminants (TACs) from emission sources at each Designated Rail Yard including resident and transient locomotives, on- and off-road equipment, and stationary equipment.

Generally, an HRA consists of three major parts: (1) an air emissions inventory for TAC emission sources, (2) air dispersion modeling to evaluate off-site airborne concentrations due to TAC emissions from these sources, and (3) the assessment of risks associated with these predicted airborne concentrations. The UPRR and BNSF are required to complete the first two parts of the risk assessment process under the Agreement. Under the MOU, ARB will conduct the assessment of risks part of the HRA process using the results of air dispersion exposure analyses conducted for each Designated Rail Yard. As noted in the MOU, specific objectives of these risk assessments include developing a basis for risk mitigation and risk communication, including developing information to place the estimated risks in appropriate context. To aid in developing information for risk communication, ARB will also be conducting health risk assessments for other significant sources of TACs within the vicinity of each Designated Rail Yards.

BNSF has retained ENVIRON International Corporation (ENVIRON) to assist it with the development of TAC emissions inventories and in conducting the air dispersion modeling for each of their Designated Rail Yards. Under the current draft Health Risk Assessment Guidance for Rail Yard and Intermodal Facilities (the "draft Guidelines", (ARB 2006a)), emission inventories and air dispersion modeling results for the following BNSF Designated Rail Yards are scheduled to be submitted by September 30, 2006: Commerce/Eastern Intermodal, Commerce/Mechanical, Los Angeles Intermodal (Hobart), Richmond, Stockton, and Watson/Wilmington (the "2006 BNSF Designated Rail Yards"). However, since the release of the draft Guidelines, ARB agreed to change the timeline for submission of the emissions and air dispersion modeling results to October 31, 2006 for Commerce/Mechanical and Richmond and November 30, 2006 for Commerce/Eastern, Hobart, Watson/Wilmington, and Stockton. These submission timelines were adjusted to accommodate ARB's request for changes to previously

completed emission inventories to reflect previously unreleased ARB models. This report presents the methods and results of the air dispersion modeling analysis conducted to evaluate TAC emissions from operations at the Commerce Eastern/Intermodal rail yard located in Commerce, California ("Commerce /Eastern").

1.1 Objectives

The purpose of this report is to summarize ENVIRON's methods used to conduct the air dispersion exposure assessment of TAC emissions from the BNSF Commerce/Eastern Yard and to provide the results of this analysis to ARB for their completion of the HRA for this rail yard. As discussed in the draft Guidelines (ARB 2006a), the air dispersion modeling exposure assessment requires the selection of the dispersion model, the data that will be used in the dispersion model (pollutants to be modeled with appropriate averaging times, source characterization, building downwash, terrain, meteorology) and the identification of receptors whose potential exposure will be considered in ARB's HRA. ENVIRON previously provided to ARB a report that described ENVIRON's model selection, meteorological data selection, and meteorological data processing methodologies for all the 2006 BNSF Designated Rail Yards (ENVIRON 2006). ARB approved these aspects of the air dispersion modeling analysis on August 3, 2006.¹ The remainder of this introduction section summarizes ENVIRON's selection of the air dispersion model to provide the modeling context for the methods discussed in the remainder of this report.

1.2 Methodologies

As discussed in the draft Guidelines, "air dispersion modeling uses mathematical formulations to characterize the atmospheric processes that disperse a pollutant emitted by a source" (ARB 2006a). The Agreement currently requires that air dispersion modeling be performed to estimate airborne concentrations from the dispersion of TAC and particulate matter emissions from relevant sources at each Designated Rail Yard. The emissions of diesel particulate matter (DPM) are separated from other particulate related TAC emission data in the model input and output (ARB 2006a). Air dispersion modeling requires the selection of an appropriate dispersion model and input data based on regulatory guidance, common industry standards/practice, and/or professional judgment. In general, ENVIRON performed air dispersion modeling for the BNSF Designated Rail Yards consistent with previous studies and/or guidance documents prepared by ARB (ARB 2004, 2005a, 2005c, 2006a) and the United States Environmental Protection Agency (USEPA 2000, 2004a, 2004b, 2005a, 2005b).

¹ Personal communication, J. Yuan of ARB by e-mail to D. Daugherty of ENVIRON on August 3, 2006.

ENVIRON used the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD version 04300) to estimate airborne concentrations resulting from TAC emissions from the BNSF Commerce/Eastern Yard. The AERMOD model was developed as a replacement for USEPA's Industrial Source Complex (ISC) air dispersion model to improve the accuracy of air dispersion model results for routine regulatory applications and to incorporate the progress in scientific knowledge of atmospheric turbulence and dispersion. Both models are near-field, steady-state Gaussian plume models, and use site-representative hourly surface and twice-daily upper air meteorological data to simulate the effects of dispersion of emissions from industrial-type releases (e.g., point, area, and volume) for distances of up to 50 kilometers (USEPA 2005b).

For the past 20 years, refined near-field air dispersion modeling has typically been conducted using USEPA's Industrial Source Complex (ISC) model. However, on November 9, 2005, the USEPA promulgated final revisions to the federal Guideline on Air Quality Models (USEPA 2005a). These revisions recommend that AERMOD, including the PRIME building downwash algorithms, be used for dispersion modeling evaluations of criteria air pollutant and toxic air pollutant emissions from typical industrial facilities. A one-year transition period commenced from the promulgation date of November 9, 2005. AERMOD provides better characterization of plume dispersion than does ISC, according to USEPA (USEPA 2003). AERMOD also is the model recommended by ARB in the draft Guidelines (ARB 2006a).

1.3 Report Organization

This report is divided into six sections as follows:

Section 1.0 - Introduction: describes the purpose and scope of this report and outlines the report organization.

Section 2.0 - Site Description: provides a brief description of the Commerce/Eastern Facility and its operations.

Section 3.0 - Emission Inventory Summary: summarizes the TAC emission inventory results that were previously submitted to ARB under a separate report (included as Appendix A).

Section 4.0 - Air Dispersion Modeling: describes the air dispersion modeling methods used to estimate air chemical concentrations.

Section 5.0 -Uncertainties: summarizes some of the uncertainties resulting from various assumptions used in the air dispersion evaluation as well as from those used in the emission inventory development.

Section 6.0 - References: includes all references cited in this report.

The appendices include supporting information as follows:

Appendix A: provides ENVIRON's previous report to ARB on the emission estimation methodologies and results.

Appendix B: provides the tables of hourly, daily, and seasonal temporal information for source activities

Appendix C: provides the electronic SCREEN3 input and output files for plume rise adjustments for locomotive movement activities

Appendix D: provides the electronic AERMOD-ready meteorological data files and raw surface and upper air meteorological data files

Appendix E: provides the electronic building downwash input and output files

Appendix F: provides the electronic digital elevation model (DEM) files

Appendix G: provides the electronic shapefiles containing census data for the Los Angeles area

Appendix H: discusses the sensitivity analysis used to determine the spacing and extents of the receptor grids

Appendix I: provides the electronic input and output files for AERMOD

Appendix J: provides the electronic air concentration tables in Microsoft Access database file

2.0 SITE HISTORY

The Commerce/Eastern site description incorporated in this evaluation is based primarily on information provided by BNSF and its contractors' staff. The following information is included to facilitate understanding of this site's operations as evaluated by this work.

2.1 Site Setting and Description

Commerce/Eastern is located at 2818 Eastern Avenue in Commerce, California and is approximately 9 kilometers east of Los Angeles. As shown in Figure 2-1, Commerce/Eastern is located in a commercial and manufacturing area with several residential areas located within two kilometers. Commerce/Eastern is bordered by the adjacent main line to the north and east, Eastern Avenue to the west, and commercial properties to the south. Commerce/Eastern is also located within eight kilometers of three other major roadways, including: I-710 to the west, I-605 to the east, and Highway 60 located to the north. Figure 2-2 depicts available land use data from the United States Geological Survey's (USGS's) National Land Cover Dataset (USGS 2006) within 20 kilometers (km) of Commerce/Eastern, as required by the draft Guidelines (ARB 2006a). Table 2-1 summarizes the percentage of each land use category within this 20-km radius.

The Facility generally runs northwest and southeast and consists of a locomotive classification yard, intermodal area, and administration and equipment maintenance buildings. The adjacent main line located just north of Commerce/Eastern is used for commuter rail (both AMTRAK and Metrolink) and freight services. ENVIRON included this segment of the adjacent main line in the air dispersion modeling analysis as per the draft Guidelines.

2.2 Facility Operations

Activities at Commerce/Eastern include locomotive switching, locomotive line haul, passenger locomotives, cargo handling equipment, track maintenance, on-road fleet vehicles, on-road container trucks, and transportation refrigeration units (TRUs). The approximate locations of these activities at the Facility are shown in Figures 2-3 through 2-5.

The Facility emissions activities can be divided into the following operational areas: the adjacent main line located just north of the Facility, the classification yard, located south of the adjacent main line, and intermodal area which covers the entire Facility. The emission activities

(and emission category, as designated in Appendix A) occurring in these two operational areas are outlined below:

Facility Operational Areas

Adjacent Main Line

- E. Arriving-Departing Line Haul
- F. Passing Line Haul
- G. Passenger Locomotives
- K2. Track Maintenance

Classification Yard

- D. Switching

Intermodal Area

- H. Cargo Handling Equipment
- I. On-Road Container Trucks
- J. On-Road Fleet Vehicles
- K1a. Container TRUs

The adjacent main line includes arriving/departing line haul, passing line haul, passenger locomotives, and track maintenance activities. The adjacent main runs along immediately north of the northern boundary of the Facility, and its activity may or may not be considered part of the Facility. The adjacent main line considered for this project is approximately 1.2 km in length and runs from the northwest to the southeast along the Facility boundary. The locations of locomotive and track maintenance activities occurring on the adjacent main line are shown in Figures 2-3 and 2-4.

The classification yard includes locomotive switching operations, which occur on two tracks just south of the adjacent main line. The two tracks run parallel to the adjacent main line for approximately 800 meters before converging toward the east end of the Facility. The locations of switching activities at the Facility are indicated in Figures 2-3 and 2-4.

The intermodal area includes cargo handling equipment, on-road container truck, on-road fleet vehicle, and container TRU activities. Cargo handling equipment is used to handle intermodal freight at the Commerce/Eastern site and includes yard vehicles and hostlers and lift machines. Lift machine operations is limited to the switching area while yard vehicles and hostlers can operate anywhere within the Facility, as shown in Figure 2-4. Container TRU activities may

occur anywhere in the Facility, as shown in Figure 2-4. On-road container trucks can enter the intermodal area at one of two ingresses and then travel anywhere within the Facility. The BNSF on-road vehicles can also travel anywhere within the Facility. Vehicular operational areas are shown in Figure 2-5.

3.0 EMISSION INVENTORY SUMMARY

ENVIRON estimated emissions for BNSF Commerce/Eastern Yard activities and provided this to ARB previously (Appendix A). The methodology used to calculate the DPM and gasoline TAC emission factors were described in this previous submission to ARB. Detailed calculation methodologies and the resulting emission factors are included as Appendix A. The remainder of this section provides a brief summary of the Commerce /Eastern activities for which TAC emissions were estimated.

3.1 Locomotive DPM Emissions

ENVIRON described Commerce/Eastern locomotive operations by dividing the emissions activities into four emissions categories:

- D. Switching
- E. Arriving and Departing Trains
- F. Adjacent Freight Movements
- G. Adjacent Commuter Rail Operations

Category designations (i.e., D, E, F, and G) for each locomotive activity were assigned in Appendix A.

From data provided by BNSF and through discussions with BNSF operations staff, ENVIRON determined the overall activity of locomotive operations. The locomotive operations data, detailed in Appendix A, included the number of engines, and the typical time in notch setting for those engines active at the facility. ENVIRON inferred locomotive movements and time in engine notch settings based on information provided by BNSF. See Appendix A for a detailed description of the information and estimates used to define operations and resulting emissions within activity categories D, E, F, and G. Temporal emission profiles were developed for each locomotive activity based on hourly locomotive counts. Variable hourly, daily, and seasonal emission factors were applied in the air dispersion modeling to approximate the temporal variations in emissions from locomotive activities, as discussed in Section 4.3. These temporal emission factors are presented in electronic tables in Appendix B.

The locomotive freight (designated as activity category F in Appendix A) and commuter activities (including both AMTRAK and Metrolink activities, designated as activity category G in Appendix A) on the adjacent main line could be considered as separate sources from the

Facility operational areas because the adjacent main line operates by and large independent of the Facility. Appendix A contains the details of the methods used to estimate emissions from these activity categories. Temporal emission profiles were developed for freight and commuter activities based on hourly locomotive counts for freight activities and schedule information and hourly passenger locomotive counts for AMTRAK and Metrolink activities. Variable hourly, daily, and seasonal emission factors were applied in the air dispersion modeling, as discussed in Section 4.3, to approximate the temporal variations in emissions from freight and passenger locomotive activities. These temporal emission factors are presented in electronic tables in Appendix B.

3.2 DPM Emissions from Cargo Handling Equipment

Cargo handling equipment (designated as activity category H in Appendix A) consisted of equipment that was used to handle intermodal freight at the Commerce/Eastern site and included lift machines and yard vehicles and hostlers. DPM emissions due to cargo handling equipment activities were estimated using the emission factors determined using the equipment population list and default activity data from the draft EMFAC2005 model provided by ARB (2006c). Additional details regarding the emission calculation methodology are discussed in Appendix A.

3.3 DPM Emissions from On-Road Container Trucks

On-road container trucks (designated as activity category I in Appendix A) included tractor-trailers trucks that receive or deliver containers to the container yard (i.e., the intermodal area) at Commerce/Eastern. DPM emissions due to on-road container truck travel at Commerce/Eastern were estimated using emission factors from the draft EMFAC2005 model provided by ARB (2006c) and an average on-site travel distance. Truck counts at the facility entrance and exit gates, entrance and exit queuing time (used in the calculation of idling emissions at the entrance and exit gates), and average speed and distance on site were determined from a sample chase truck study at the Commerce/Eastern Yard. Additional details regarding the emission calculation methodologies are discussed in Appendix A.

3.4 DPM and Gasoline TAC Emissions from On-Road Fleet Vehicles

On-road fleet vehicles (designated as activity category J in Appendix A) included employee vehicles owned by BNSF and road-legal vehicles owned by BNSF (i.e., passenger vehicles and small trucks) used for both on-site and off-site travel. DPM and gasoline TAC emissions due to on-road fleet vehicle activities were estimated using the emission factors from the draft

EMFAC2005 model provided by ARB (2006c) and an average on-site travel distance. Appendix A presents additional details regarding the methods used to estimate emissions from these vehicle activities.

3.5 DPM and Gasoline TAC Emissions from Off-Road Equipment

ENVIRON categorized Off-Road Equipment at the Facility into two main types of equipment: TRUs and track maintenance equipment (designated as activity category K in Appendix A). TRUs are used to regulate temperatures during the transport of products with temperature requirements. For BNSF operations at Commerce/Eastern, temperatures are regulated by TRUs in shipping containers when the material being shipped requires such temperature regulation. TRU emissions were estimated using the draft version of the OFFROAD model provided by ARB (2006c). TRU yearly activity was estimated using the time onsite by TRU configuration (only shipping container at Commerce /Eastern) and mode of transport. This activity data was used along with ARB default age, horsepower, and load factor input estimates in the OFFROAD model to estimate TRU emissions. Additional details regarding the emission calculation methodologies are discussed in Appendix A.

Track maintenance equipment included equipment used to service tracks and included a variety of large and small engines and equipment. BNSF California track maintenance equipment can be used on any or all tracks within California to maintain the network. Therefore, DPM and gasoline TAC emissions for a given facility were estimated by apportioning the sum of emissions from all track maintenance equipment in California by site using the relative track mileage (including all tracks, main line and other tracks) at the site to the California total track mileage. Total exhaust emissions from track maintenance equipment were estimated using the draft version of the OFFROAD model (ARB 2006c). Additional details regarding the emission calculation methodologies are discussed in Appendix A.

3.6 Emission Estimates Summary

Tables 3-1a and 3-1b summarize the total annual emissions, operating hours, and the emission rate (in grams per second or grams per square meter per second) for each emission source by activity subcategory for DPM and gasoline emission sources, respectively. ENVIRON performed the air dispersion modeling to estimate period-average DPM and gasoline concentrations using χ/Q emission rates (i.e., one gram per second per source for point and volume sources and one gram per second divided by the total surface area of the source group for each area source), resulting in period-average dispersion factors. Tables 3-1a and 3-1b include the emission rates (in grams per second) applied to the period-average dispersion factors from

the air dispersion model to calculate period-average air concentrations. Table 3-1b also includes the maximum hourly TOG emission rates for gasoline sources used to estimate maximum one-hour TAC concentrations.

Table 3-2 outlines the annual DPM and TAC emissions estimated for each of the main source categories described in this section and their contribution to the total DPM and gasoline TOG and PM emissions. The emissions for each of the activities were distributed spatially and temporally over the range of operations as described in more detail in Section 4.

4.0 AIR DISPERSION MODELING

ENVIRON performed air dispersion modeling to estimate exposure concentrations from the dispersion of DPM and TAC emissions from routine operational sources at Commerce/Eastern. ENVIRON evaluated DPM emissions from locomotive and on- and off-road diesel engines as well as TAC emissions from gasoline engines. Air dispersion modeling requires the selection of an appropriate dispersion model and input data based on regulatory guidance, common industry standards/practice, and/or professional judgment. As stated previously, ENVIRON performed air dispersion modeling generally consistent with previous studies and guidance documents (ARB 2004, 2005a, 2005c, 2006a and USEPA 2000, 2004a, 2004b, 2005a, 2005b) based on the information available at the time of the assessment. The type of air dispersion model and modeling inputs (i.e., pollutants to be modeled with appropriate averaging times, source characterization and parameters, meteorological data, building downwash, terrain, land use, and receptor locations) that we used in the air dispersion modeling for Commerce/Eastern are discussed below.

4.1 Model Selection and Model Control Options

As discussed in the Introduction, ENVIRON used the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD version 04300) to estimate airborne concentrations resulting from DPM and TAC emissions from the BNSF Commerce/Eastern Yard as recommended in the draft Guidelines (ARB 2006a) and USEPA air dispersion modeling guidelines (2005b). AERMOD was developed as a replacement for USEPA's Industrial Source Complex (ISC) air dispersion model to improve the accuracy of air dispersion model results for routine regulatory applications and to incorporate the progress in scientific knowledge of atmospheric turbulence and dispersion. This change was made in November 2005 (USEPA 2005a). After a one-year transition period for the change in model (i.e., as of November 9, 2006), ISC will no longer be considered a USEPA-approved model for certain regulatory applications. Both models are near-field, steady-state Gaussian plume models, and use site-representative hourly surface and twice-daily upper air meteorological data to simulate the effects of dispersion of emissions from industrial-type releases (e.g., point, area, and volume) for distances of up to 50 kilometers (USEPA 2005b).

AERMOD is appropriate for use in estimating ground-level short-term ambient air concentrations resulting from non-reactive buoyant emissions from sources located in simple and complex terrain. ENVIRON conducted the air dispersion analysis using AERMOD in the regulatory default mode, which includes the following modeling control options:

- adjusting stack heights for stack-tip downwash (except for building downwash cases),
- incorporating the effects of elevated terrain,
- employing the calms processing routine, and
- employing the missing data processing routine.

4.2 Modeled Pollutants and Averaging Periods

Calculation of chemical concentrations for use in exposure analysis requires the selection of appropriate concentration averaging times. ENVIRON based the selection of appropriate averaging times on the toxicity criteria data developed by the California Environmental Protection Agency (CalEPA).

For DPM, CalEPA has developed toxicity criteria for both carcinogenic and chronic non-carcinogenic effects (CalEPA 2005a, 2005b). Therefore, ENVIRON estimated the annual average DPM concentration over the span of the meteorological data for ARB's use in estimating cancer and chronic non-cancer risk. ENVIRON did not calculate maximum short-term concentrations (one-hour averages) for DPM as an acute toxicity criteria for DPM has not been developed by the CalEPA (i.e., no acute reference exposure level (REL) is listed) (CalEPA 2000).

ENVIRON evaluated a large number of non-DPM TACs in this assessment from non-DPM sources (mainly from gasoline engine emissions) as identified in the speciation profiles discussed in Appendix A. ENVIRON estimated both annual-average and maximum one-hour concentrations for each non-DPM TAC. In order to substantially reduce modeling complexity and run time, maximum one-hour TOG exhaust, TOG evaporative, and PM exhaust emission rates (as opposed to maximum one-hour individual TAC emission rates) were input into the air dispersion model. Speciation profiles containing the fractions of individual TACs for TOG exhaust, TOG evaporative, and PM exhaust emissions (discussed in Appendix A) were then applied to the TOG exhaust, TOG evaporative, and PM exhaust concentrations estimated by the dispersion model to calculate concentrations of individual TACs. This methodology resulted in conservative estimates (i.e., over-predictions) of the maximum one-hour concentrations for individual TACs.

4.3 Source Characterization and Parameters

Source characterization, location, and parameter information is necessary to model the dispersion of air emissions. ENVIRON modeled DPM and other TAC emissions from operational sources

at Commerce/Eastern, as described above. In general, we determined source locations from the activity information discussed in Section 2, facility plot plans, information provided by BNSF personnel and contractors, and/or recent aerial photographs of the facility and surrounding areas. ENVIRON accounted for temporal (i.e., hourly, daily, and/or seasonal) variations in activities and emissions from each source by using variable hourly, daily, and seasonal emission factors where available. ENVIRON represented emissions from locomotive sources, vehicular sources, and mobile equipment sources as one of the following source types, and generally consistent with the draft Guidelines (ARB 2006a), where possible:

- Point source (a source with emissions emanating from a known point, with buoyancy due to either thermal or mechanical momentum). A point source is characterized by a height, diameter, temperature, and exit velocity.
- Volume source (a source with emissions that have no buoyancy and are emanated from a diffuse area). A volume source is characterized by an initial lateral and vertical dimension (initial dispersion) and a release height.
- Area source (a source with emissions that have no buoyancy and are emanated from a diffuse plane or box). An initial vertical dimension and release height may also be specified for an area source.

ENVIRON used point sources to model emissions from stationary idling locomotive source activities. We used volume sources to represent emissions from moving sources along specific pathways (e.g., moving locomotives, trucks, and cars). ENVIRON used area sources to represent emissions from mobile equipment and vehicles operating over large areas. Additional details regarding the characterization of sources, source locations, and modeling parameters for each source category discussed in Section 3.0 are described below.

4.3.1 Locomotives at the Facility

4.3.1.1 Stationary Idling Locomotives

ENVIRON represented DPM emissions from stationary idling locomotives by point sources spaced approximately every 50 meters similar to ARB's Roseville Study (ARB 2004). ENVIRON placed point sources along railway lines at Commerce/Eastern in areas where stationary idling activities occur, staggering point sources on adjacent parallel railway lines. The locations of point sources representing stationary locomotives are shown in Figure 4-1. ENVIRON distributed emissions uniformly among the point sources comprising each stationary idling activity. Based on information from BNSF

personnel ENVIRON assumed that emissions from stationary locomotive switching activities occur seven days per week on the following schedule:

- 8:00 am - 4:00 pm every day
- 4:00 pm - 2:00 am Monday through Friday (it was assumed that switching activities that commenced at 4:00 pm on Friday would continue to 2:00 am on Saturday morning).

Also, based on information from BNSF personnel, ENVIRON assumed that emissions from stationary arriving-departing line haul operations would take place 24 hours per day, seven days per week. Table 3-1a summarizes the emissions and operating hours for each stationary locomotive activity. Variable hourly, daily, and seasonal emission factors were also applied to approximate the temporal variations in emissions from these sources. These variable emission profiles are summarized in electronic tables in Appendix B.

Facility personnel provided source parameter information (i.e., release height, velocity, temperature, and diameter), which was based on the specific locomotive types and notch settings for each stationary locomotive activity (e.g., idling or load testing). ENVIRON performed fleet-averaging of locomotive source parameters as recommended by the draft Guidelines (ARB 2006a) to reduce the large number (from approximately 710 to 134) of potential source parameter configurations related to the stationary locomotive activities at Commerce/Eastern. Fleet-averaging of source parameters was performed by weighting the source parameters for each locomotive model type by the percentage of emissions from each locomotive model type for a given locomotive activity. Table 4-1 summarizes the fleet-average source parameters for stationary locomotive activities at Commerce/Eastern.

4.3.1.2 Locomotive Movement

ENVIRON represented moving locomotive DPM sources by individual volume sources spaced approximately every 50 meters similar to ARB's Roseville Study (ARB 2004). ENVIRON placed sources along railway lines at Commerce/Eastern where movement activities occur. Figure 4-2 shows the locations of modeled volume (movement) sources at the Facility. ENVIRON distributed emissions evenly among the volume sources comprising each movement activity. Based on information from BNSF personnel ENVIRON assumed that emissions from moving locomotive switching activities occur seven days per week on the following schedule:

- 8:00 am-4:00 pm every day
- 4:00 pm- 2:00 am Monday through Friday (it was assumed that switching activities that commenced at 4:00 pm on Friday would continue to 2:00 am on Saturday morning).

Also, based on information from BNSF personnel, ENVIRON assumed that emissions from all other moving locomotive operations would take place 24 hours per day, seven days per week. Table 3-1a summarizes the emissions and operating hours for each locomotive movement activity. Variable hourly, daily, and seasonal emission factors were also applied to approximate the temporal variations in emissions from these sources. These variable emission profiles are summarized in electronic tables in Appendix B.

For locomotive movement sources occurring along single rail lines, ENVIRON set the length of side for each volume source equal to the width of the fleet-average locomotive. In order to reduce modeling complexity and decrease model run-times, and in order to reduce the number of volume sources required to represent multiple parallel rail lines, ENVIRON used larger volumes with the length of side equal to the combined width of the rail lines plus the width of a locomotive. ENVIRON used a similar methodology (i.e., volumes with the length of side equal to the combined width of the rail lines plus the width of a locomotive) to represent converging or diverging rail lines, resulting in progressively smaller volumes as the rail lines converged and progressively larger volumes as rail lines diverged. ENVIRON performed sensitivity analyses to evaluate the use of a single set of larger volume sources versus multiple sets of smaller volume sources along multiple parallel rail lines and converging rail lines. These sensitivity analyses demonstrated that the use of larger volume sources with 50-meter source spacing generally resulted in receptor concentrations within five percent of the receptor concentrations predicted by the multiple sets of smaller volume sources and smaller source spacing. The results of these sensitivity analyses are discussed in more detail in Appendix C of ENVIRON's *Air Dispersion Modeling Assessment of Air Toxic Emissions from BNSF Commerce/Mechanical Rail Yard* ("BNSF Commerce/Mechanical") Report (ENVIRON 2006b). ENVIRON calculated the corresponding initial lateral dimension of each volume source from USEPA guidance (USEPA 2004b).

ARB accounted for buoyancy effects of exhaust from locomotive movement activities by calculating plume rise adjustments to the release height using USEPA's SCREEN3 model for all 11 different locomotive models considered in the study (ARB 2004). Due to variability in locomotive travel speeds, hourly wind speeds, and hourly stability class, a potentially large uncertainty is associated with these plume rise adjustments.

ENVIRON also calculated plume rise adjustments to the release height using the SCREEN3 model and a methodology similar to that of ARB (ARB 2004). Due to the uncertainty associated with variable locomotive speeds, hourly wind speeds, and hourly stability class, plume rise adjustments were calculated based on fleet-average locomotive parameters for individual locomotive activities. For source activities with multiple notch settings (e.g., locomotive switching), ENVIRON selected plume rise predictions based on fleet-average source parameters for the single notch setting with the highest percentage of activity emissions. For movement activities with a range of locomotive speeds, the wind speed in SCREEN3 was set equal to the maximum locomotive speed, resulting in lower, more conservative plume rise adjustments. ENVIRON calculated the corresponding initial lateral dimension of each volume source from USEPA (USEPA 2004b) guidance. Tables 4-1 and 4-2 summarize the modeling source parameters, approximate travel speeds, and plume rise adjustments used for locomotive movement sources at Commerce/Eastern. Electronic SCREEN3 input and output files used to determine plume rise adjustments are attached in Appendix C.

4.3.2 Cargo Handling Equipment

4.3.2.1 Lift Machines

As lift machines operations may occur over a large area of the Facility, and as specific modeling source parameters were not available for the lift machines, ENVIRON conservatively represented DPM emissions from lift machines by area sources as recommended by the draft Guidelines (ARB 2006a). ENVIRON placed area sources over areas where lift machine activities occur. According to BNSF facility personnel, all lift machine activities occur along an area approximately 70 meters wide encompassing most of the switching area of the Facility. The locations of area sources representing lift machines are shown in Figure 4-3. Emissions within this operating area were distributed uniformly based on information from BNSF personnel. ENVIRON assumed that emissions from lift machine activities occur 24 hours per day, seven days per week based on information from BNSF personnel. Table 3-1a summarizes the DPM emissions and operating hours for lift machines at Commerce/Eastern.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for lift machines obtained from BNSF personnel varied considerably (e.g., release heights varied between 2.9 meters and 15.4 meters). Therefore, ENVIRON conservatively selected the upper end of the range of release heights (3.9 meters) from ARB's Port of Los Angeles/Port of Long Beach (POLA/POLB) Study (ARB 2005c) for

use in the air dispersion modeling. ENVIRON did not consider plume rise for lift machines due to the large variation in measured release temperatures and velocities reported by BNSF personnel. The use of a potentially lower release height based on information from the ARB POLA/POLB Study and the exclusion of plume rise adjustments to the release height result in higher (more conservative) predictions of receptor concentrations. ENVIRON calculated the corresponding initial vertical dimension of each area source from USEPA (USEPA 2004b) guidance. Table 4-3 summarizes the modeling source parameters for lift machine activities at Commerce/Eastern.

4.3.2.2 Yard Vehicles and Hostlers

As yard vehicles and hostlers may operate throughout the entire area of the Facility, and as specific modeling source parameters were not available for yard vehicles and hostlers, ENVIRON conservatively represented DPM emissions from yard vehicles and hostlers by area sources as recommended by the draft Guidelines (ARB 2006a). ENVIRON placed area sources over areas where yard vehicle and hostler activities occur. According to BNSF facility personnel, yard vehicles and hostlers operate over the entire area of the Facility. The locations of area sources representing yard vehicles and hostlers are shown in Figure 4-3. Emissions within this operating area were distributed uniformly based on information from BNSF personnel. ENVIRON assumed that emissions from yard vehicles and hostlers occur 24 hours per day, seven days per week based on information from BNSF personnel. Table 3-1a summarizes the DPM emissions and operating hours for yard vehicles and hostlers at Commerce/Eastern.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for yard vehicles and hostlers was not available from BNSF personnel. Therefore, ENVIRON assumed that emissions release characteristics for yard vehicles and hostlers were similar to on-road fleet vehicles, and used a release equal to 0.6 meters (i.e., the same release height as on-road fleet vehicles). ENVIRON also assumed that exhaust emissions from yard vehicles and hostlers were released horizontally, and that plume rise due to differences in temperature between the vehicle exhaust and ambient air was negligible. ENVIRON calculated the corresponding initial vertical dimension of each area source from USEPA (USEPA 2004b) guidance. Table 4-3 summarizes the modeling source parameters for yard vehicles and hostler activities at Commerce/Eastern.

4.3.3 On-Road Container Trucks

ENVIRON represented DPM emissions from on-road container trucks by a combination of volume and area sources as recommended by the draft Guidelines (ARB 2006a) and in discussions with ARB staff.² ENVIRON used area sources to represent on-road container truck travel and idling in areas of the Facility where the travel path(s) and idling areas were not well-defined (i.e., in the intermodal area). ENVIRON represented on-road container truck idling at the two ingress pathways of the Facility with individual volume sources spaced approximately every 50 meters, similar to locomotive idling activities. The locations of volume and area sources representing on-road container truck travel areas and idling areas and pathways are shown in Figure 4-4. Based on information from BNSF personnel, ENVIRON assumed that on-site idling emissions (except emissions at the entrance and exit) occurred throughout the intermodal area, and were distributed uniformly. Also, since the ingress pathways were not designated as entrance or exit, the entrance and exit idling emissions were split evenly across both pathways. ENVIRON assumed that emissions from on-road container truck activities occur 24 hours a day, seven days per week based on information from BNSF personnel. Table 3-1a summarizes the DPM emissions and operating hours for on-road container trucks.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for BNSF on-road fleet vehicles was not available from BNSF personnel. Based on information from a previous ARB study (ARB 2000) and recommendations by ARB staff,³ ENVIRON used a release height of 4.0 meters for on-road container truck idling and travel during the daytime (i.e., 6 a.m. to 6 p.m.) and a release height of 6.0 meters for nighttime (i.e., 6 p.m. to 6 a.m.) to account for plume rise. ENVIRON calculated the corresponding initial vertical dimension of each volume and area source from USEPA (USEPA 2004b) guidance. Table 4-4 summarizes the modeling source parameters for on-road container truck activities at Commerce/Eastern.

4.3.4 Off-Road Equipment

4.3.4.1 Container TRUs

As container TRUs may be located throughout the entire area of the Facility, and as specific modeling source parameters were not available, ENVIRON conservatively represented DPM emissions from container TRUs by area sources as recommended by

² Personal communication. Gavin Hoch of ENVIRON by telephone with Jing Yuan of ARB on August 24, 2006.

³ Personal communication. Gavin Hoch of ENVIRON by telephone with Pingkuan Di of ARB on August 31, 2006.

the draft Guidelines (ARB 2006a). ENVIRON placed area sources over areas where container TRU activities occur. According to BNSF facility personnel, container TRUs may be located anywhere where intermodal activities occur including the area covering the adjacent main line (i.e., throughout the entire area of the Facility plus the area including the adjacent main line). The locations of area sources representing container TRUs are shown in Figure 4-3. Emissions were distributed uniformly throughout the entire area of the Facility based on information from BNSF personnel. ENVIRON assumed that emissions from container TRUs occur 24 hours per day, seven days per week, based on information from BNSF personnel. Table 3-1a summarizes the DPM emissions and operating hours for container TRUs at the Facility.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for container TRUs was not available from BNSF personnel. ENVIRON conservatively assumed the release height of a container TRU (1.0 meters) based on photographs of container TRUs, and did not account for the elevated release height for multiple, vertically stacked containers or the height of the base of the container TRUs above the ground for containers on trailers (i.e., the release height was based on the release point above the base of the container, not above the ground). This conservative assumption likely results in over-predictions of receptor concentrations. ENVIRON calculated the corresponding initial vertical dimension of each area source from USEPA (USEPA 2004b) guidance. Table 4-3 summarizes the modeling source parameters for container TRUs at Commerce/Eastern.

4.3.4.2 Track Maintenance Equipment

As track maintenance equipment operations may occur over the entire adjacent main line, and as specific modeling source parameters were not available for track maintenance equipment, ENVIRON conservatively represented DPM and gasoline TAC emissions from track maintenance equipment by area sources as recommended by the draft Guidelines (ARB 2006a). ENVIRON placed area sources over railway lines at Commerce/Eastern in areas where track maintenance activities occur. The locations of area sources representing track maintenance equipment are shown in Figure 4-3. Emissions within this operating area were distributed uniformly based on information from BNSF personnel. ENVIRON assumed that emissions from track maintenance activities occur weekdays (i.e., Monday through Friday) from 7 a.m. to 7 p.m. based on information from BNSF personnel. Tables 3-1a and 3-1b summarize the DPM and gasoline emissions, respectively, and operating hours for track maintenance equipment.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for track maintenance equipment was not available from BNSF personnel. Because track maintenance equipment generally appeared to be similar in height to locomotives and have vertical emissions releases, ENVIRON assumed an average release height corresponding to the lowest moving locomotive release height adjusted for plume rise (i.e., the lowest adjusted release height in Table 4-2). ENVIRON calculated the corresponding initial vertical dimension of each area source from USEPA (USEPA 2004b) guidance. Table 4-3 summarizes the modeling source parameters for track maintenance equipment activities at Commerce/Eastern.

4.3.5 On-Road Fleet

Because on-road fleet vehicles may travel anywhere within the Facility and travel paths are not well-defined, ENVIRON represented DPM and gasoline TAC emissions from BNSF on-road fleet vehicles by area sources as recommended by the draft Guidelines (ARB 2006a) and in discussions with ARB staff.⁴ The locations of area sources representing on-road fleet vehicle travel paths/areas are shown in Figure 4-4. As Facility personnel did not have information specifying the approximate number of fleet vehicles or approximate percentage of emissions associated with any travel area, ENVIRON assumed an equal amount of travel over all areas. ENVIRON assumed that emissions from on-road vehicles occur weekdays (i.e., Monday through Friday) from 7 a.m. to 7 p.m. based on information from BNSF personnel. Tables 3-1a and 3-1b summarize the DPM and gasoline emissions, respectively, and operating hours for BNSF on-road fleet vehicles.

Model-specific source parameter information (i.e., release height, velocity, temperature, and diameter) for BNSF on-road fleet vehicles was not available from BNSF personnel. Based on information from a previous ARB study (ARB 2000) and recommendations by ARB staff,⁵ ENVIRON used a release height of 0.6 meters for on-road fleet vehicles. ENVIRON assumed that exhaust emissions from on-road fleet vehicles were released horizontally, and that plume rise due to differences in temperature between the vehicle exhaust and ambient air was negligible. ENVIRON calculated the corresponding initial vertical dimension of each volume and area source from USEPA (USEPA 2004b) guidance. Table 4-4 summarizes the modeling source parameters for BNSF on-road fleet vehicle activities at Commerce/Eastern.

⁴ Personal communication. Gavin Hoch of ENVIRON by telephone with Jing Yuan of ARB on August 24, 2006.

⁵ Ibid.

4.4 Meteorological Data

AERMOD requires a meteorological input file to characterize the transport and dispersion of pollutants in the atmosphere. Surface and upper air meteorological data inputs as well as surface parameter data describing the land use and surface characteristics near the site are first processed using AERMET, the meteorological preprocessor to AERMOD. The output file generated by AERMET is the meteorological input file required by AERMOD. Details of AERMET and AERMOD meteorological data needs are described in USEPA guidance documents (USEPA 2004a, 2004b). As ENVIRON previously received ARB approval of meteorological data selection and processing methods (ENVIRON 2006a), the remainder of this section only briefly describes the following two key aspects of the AERMET analysis: the surface and upper air meteorological data selected and the surface parameter evaluation for Commerce/Eastern. ENVIRON has provided the raw meteorological data and the AERMOD model-ready meteorological data file as an electronic attachment in Appendix D.

4.4.1 Surface and Upper Air Meteorological Data

The focus of the HRA to be conducted by ARB is the characterization of risk in the areas immediately surrounding Commerce/Eastern. As such, ENVIRON selected meteorological data for air dispersion modeling based upon their spatial and temporal representativeness of conditions in the immediate vicinity of the rail yard. As described in ENVIRON's report on meteorological data selection and processing methods previously approved by ARB (ENVIRON 2006), ENVIRON selected the wind speed and wind direction data from the Lynwood station for the four years from 2002 to 2005 as the most representative available wind speed and wind direction data for use in the air dispersion analysis of the BNSF Commerce and Hobart Rail Yards. ENVIRON used cloud cover, temperature and pressure data (as Lynwood did not have a complete record of temperature or pressure measurements for 2002 to 2005) from the National Weather Service's (NWS's) Los Angeles Downtown USC station from 2002 to 2005. Upper air data from the San Diego Miramar Naval Air Station (NAS) was used in AERMET processing for Commerce/Eastern (ENVIRON 2006).

4.4.2 Surface Parameters

Prior to running AERMET, it is necessary to specify the surface characteristics for the meteorological monitoring site and/or the project area. The surface parameters include surface roughness, Albedo, and Bowen ratio, and are used to compute fluxes and stability of the atmosphere (USEPA 2004a) and require the evaluation of nearby land use and temporal impacts on these surface parameters. Surface parameters supplied to the model were specified for the

area surrounding the meteorological monitoring site, rather than the project area (rail yard), as recommended by USEPA (USEPA 2005a) and ARB⁶. Because the selected meteorological station is in very close proximity to the Commerce/Eastern and the land use surrounding the meteorological station is very similar to the land use surrounding Commerce/Eastern, surface parameters calculated for the meteorological station should be representative of Commerce/Eastern.

In general, ENVIRON determined land-use sectors around Commerce/Eastern using USGS land cover maps in conjunction with recent aerial photographs. ENVIRON then specified surface parameters for each using default seasonal values adjusted for the local climate. When a land-use sector consists of multiple land use types, ENVIRON used an area-weighted average of each surface parameter as recommended by USEPA (2004a). The locale-specific surface parameters used in this evaluation were described in ENVIRON's previous report to ARB (ENVIRON 2006). Figure 4-5 shows the sectors ENVIRON selected around Commerce/Eastern for use in the AERMET processing and the USEPA land-use types within each sector. Table 4-5 summarizes the sector-specific surface parameters (surface roughness, Albedo, and Bowen ratio) determined for each of these sectors.

4.5 Building Downwash

Building downwash is the effect of structures on the dispersion of emissions from nearby point (stack) sources. As several point sources at Commerce/Eastern were identified as adjacent to buildings, ENVIRON considered building downwash in this assessment. ENVIRON estimated building dimensions (i.e., location of building corners) based on information provided by BNSF personnel and contractors. Figure 4-6 shows the buildings evaluated as part of the building downwash analysis at Commerce/Eastern. ENVIRON input building dimension information, summarized in Table 4-6, into USEPA's Building Profile Input Program - Plume Rise Model Enhancements (BPIP-PRIME) to account for potential building-induced aerodynamic downwash effects⁷. The electronic input and output files for BPIP are provided in Appendix E. A sensitivity analysis was conducted in ENVIRON's BNSF Commerce/Mechanical Report (ENVIRON 2006b) to estimate the impact of building downwash from locomotive engines on stationary locomotive sources. This sensitivity analysis indicated that, at receptor distances close

⁶ Personal communication, J. Yuan of ARB by e-mail to D. Daugherty of ENVIRON on August 3, 2006.

⁷ An additional BPIP-PRIME analysis was performed to check if buildings located on the Commerce/Mechanical facility would create building downwash effects for point sources located on the Commerce/Eastern facility. Results show that point sources associated with Commerce/Eastern are outside the area of influence of buildings at the Commerce/Mechanical facility.

to the sources (i.e., within 100 meters), building downwash may have a large impact on the modeled concentrations. However, at distances further away from the sources (i.e., 400 to 700 meters), receptor concentrations for model runs with and without building downwash were similar (i.e., within 10% of each other). Based on the results of the sensitivity analysis, and the uncertainty in placing structures corresponding to stationary locomotives in areas where stationary locomotives occur, and the inherent uncertainty in concentration predictions near to stationary and mobile sources, as discussed in Section 5.0, building downwash effects from stationary locomotives were not considered in this assessment. The results of the sensitivity analysis are discussed in more detail in the Appendix F of ENVIRON's BNSF Commerce/Mechanical Report (ENVIRON 2006b).

4.6 Terrain

Another important consideration in an air dispersion modeling analysis is whether the terrain in the modeling area is simple or complex (i.e., terrain above the effective height of the emission point). ENVIRON used the following USGS 7.5 Minute digital elevation model (DEMs) information to identify terrain heights within the modeling domain:

- Hollywood
- Los Angeles
- El Monte
- Inglewood
- Southgate
- Whittier

The electronic DEM files in the North American Datum (NAD) 1983 projection are provided in Appendix F. ENVIRON provided terrain elevation data to the AERMOD model using version 04300 of AERMAP, AERMOD's terrain preprocessor. Due to discontinuities at the boundaries between some of the DEMs, AERMAP was not able to estimate the terrain elevations for five receptor locations. Using the known terrain elevation at adjacent receptors, ENVIRON estimated the terrain elevations at these five receptors using a linear interpolation methodology.

4.7 Land Use

AERMOD can evaluate heat island effects from urban areas to atmospheric transport and dispersion using an urban boundary layer option. ENVIRON used Auer's method of classifying land-use as either rural or urban to analyze the urban nature of the region in which the primary

project area is located (Auer 1978). This method calls for analysis of the land within a three-kilometer radius from the primary project area to determine if the majority of the land can be classified as either rural (i.e. undeveloped) or urban. If more than fifty percent of the area circumscribed by this three-kilometer radius circle consists of Auer land-use industrial, commercial or residential urban land types, then the urban boundary layer option is used in modeling. ENVIRON used both the USGS National Land Cover Data and the most recent USGS aerial photograph of the area surrounding the facility to determine that more than fifty percent of the area within three-kilometers of Commerce/Eastern Yard is urban, see Figure 4-7. Therefore, ENVIRON selected the urban boundary layer option for this analysis.

Selection of the urban boundary layer option in AERMOD requires also requires an estimate of the population of the urban area in order to make adjustments to the urban boundary layer. ENVIRON used published census data for the City of Los Angeles to determine population values as recommended by USEPA (USEPA 2005a). ENVIRON also provides electronic census data for the modeling domain (described in the next section) as an electronic attachment in Appendix G, as required in the draft Guidelines.

4.8 Receptor Locations

ENVIRON used gridded receptor points surrounding the BNSF Commerce/Eastern Yard in the air dispersion analysis. These gridded receptor points represent the general population in the vicinity of the BNSF Commerce/Eastern Yard, which includes both residential and commercial populations. However, these receptors do not necessarily represent the specific locations of the residential and commercial populations in the vicinity of the BNSF Commerce/Eastern Yard. ENVIRON used three sets of discrete Cartesian receptor grid points around the Facility in the air dispersion modeling. The spacing and sizes of the Cartesian receptor grids were determined based on a screening sensitivity analysis, discussed in more detail in Appendix H. The Cartesian receptors included a fine receptor grid with spacing of 50 meters out to a distance of approximately 500 meters from the Facility boundary, a medium receptor grid with spacing of 250 meters out to a distance of approximately 1,500 meters from the Facility boundary, and a coarse receptor grid with spacing of 500 meters out to 8,500 kilometers from the Facility boundary. At the request of ARB, the coarse receptor grid was expanded eastward to approximately 10,000 meters from the Facility boundary such that the same coarse grid was used for the BNSF Commerce/Eastern and BNSF Commerce/Mechanical Yards. ENVIRON used Facility plot plans and other information provided by BNSF facility personnel to locate the Facility boundary. Receptors inside the facility boundary were removed prior to the air dispersion modeling analysis. The locations of the coarse, medium, and fine receptor grid points

are shown in Figures 4-8a, 4-8b, and 4-8c, respectively. Discrete receptor points were generated from each of the grids shown in Figures 4-8a, 4-8b, and 4-8c. The air dispersion modeling analysis did not include receptors at the Facility boundary.

In accordance with the draft Guidelines (ARB 2006a), ENVIRON also evaluated individual receptor points at off-site locations within one mile of the Facility corresponding to sensitive receptors, including schools, hospitals, and daycare centers. Sensitive receptor locations were identified from searches of the following sources:

- California Department of Education, California School Directory.
<http://www.cde.ca.gov/re/sd/>
- The Automated Licensing Information and Report Tracking System (Hospitals and Licensed Care Facilities)
<http://alirts.oshpd.ca.gov/AdvSearch.aspx>
- Yellow Pages_
<http://yp.yahoo.com>

These on-line databases were searched for the following zip codes in the cities of Commerce, East Los Angeles, Los Angeles, Maywood, and Montebello:

90022 90023 90040 90270 90640

The sensitive receptor locations identified from the search of these data sources and within one mile of the Facility are listed in Table 4-7.

Electronic census data was provided for the modeling domain in accordance with the draft Guidelines (ARB 2006a). These data, provided on a census-block level, were obtained from the GeoLytics CensusCD 2000 (GeoLytics 2001), and provided in electronic shapefile format in Appendix G.

4.9 Air Dispersion Modeling Results

ENVIRON calculated the air concentration of each TAC at each of the receptor locations discussed in Section 4.8. ENVIRON modeled DPM and TAC sources using unit emission rates (i.e., one gram per second) to estimate period-average dispersion factors for DPM and TACs corresponding to meteorological years 2002 through 2005. These period-average dispersion factors for DPM and TACs were combined with source-specific emission rates to generate period-average concentrations for the meteorological period 2002 through 2005. ENVIRON also modeled all non-DPM TAC sources using hourly-maximum evaporative TOG, exhaust TOG,

and exhaust PM emission rates in order to estimate one-hour maximum evaporative TOG, exhaust TOG, and exhaust PM concentrations for the meteorological period 2002 through 2005. ARB speciation profiles for evaporative TOG, exhaust TOG, and exhaust PM were applied to estimate chemical-specific one-hour maximum concentrations at each receptor. It should be noted that this method results in an over-prediction of maximum one-hour concentrations of individual constituents at each receptor, as discussed in the uncertainty section below. Electronic AERMOD input and output modeling files are included in Appendix I. Electronic database tables containing DPM and gasoline TAC period-average concentrations at each receptor and one-hour maximum gasoline TAC concentrations at each receptor for the meteorological period modeled are contained in Appendix J.

5.0 UNCERTAINTIES

Understanding the degree of uncertainty associated with each component of a risk assessment is critical to interpreting the results of the risk assessment. As recommended by the National Research Council (NRC 1994), [a risk assessment should include] "a full and open discussion of uncertainties in the body of each EPA risk assessment, including prominent display of critical uncertainties in the risk characterization." The NRC (1994) further states that "when EPA reports estimates of risk to decision-makers and the public, it should present not only point estimates of risk, but also the sources and magnitude of uncertainty associated with these estimates." Similarly, recommendations to CalEPA on risk assessment practices and uncertainty analysis from the Risk Assessment Advisory Committee (RAAC) were adapted from NRC recommendations (RAAC 1996). Thus, to ensure an objective and balanced characterization of risk and to place the risk assessment results in the proper perspective, the results of a risk assessment should always be accompanied by a description of the uncertainties and critical assumptions that influence the key findings of the risk assessment.

In accordance with the recommendations described above and as required in the draft Guidelines (ARB 2006a), ENVIRON has evaluated the uncertainties associated with the first two steps of an HRA: (1) emissions estimation and (2) air dispersion modeling. The uncertainties and critical assumptions associated with these steps are described below. Consistent with the Agreement, ARB will complete the third major part of the HRA which consists of estimating the risks for each of the designated rail yards and evaluating the uncertainties associated with the risk characterization component of the HRA (ARB 2005b). As noted in the Agreement, specific objectives of the HRAs to be conducted by ARB include developing a basis for risk communication, including describing the uncertainties associated with the key findings of the risk assessment. At the request of ARB, ENVIRON will assist ARB in identifying the critical assumptions and uncertainties associated with the risk characterization step of the HRA. This uncertainty evaluation will be conducted concurrent with the ARB risk characterization activities and will be provided to ARB in a separate submittal.

The following section summarizes the critical uncertainties associated with the emissions estimation and air dispersion modeling components of the risk assessment.

5.1 Estimation of Emissions

The uncertainties associated with emissions estimates and projections include uncertainties in activity and emission rates for the base year as well as projected future years. Although future year emissions were not evaluated in this assessment, the residential and worker risk scenarios

will be evaluated for 70-year and 40-year periods, respectively, at a minimum by ARB. Thus, uncertainty due to future changes in activity and emission rates will be generally discussed. The uncertainty in activity and emissions estimates applies to both locomotive and non-locomotive sources.

For locomotive sources, the activity rates include primarily the number of engines operating and time in modes. The number of engines operating in the facility on the mainline are accurately measured and counted at readers, but the readers are not necessarily located exactly at the site under study, and can under certain circumstances produce erroneous duplicate readings that could only be accounted for via rough approximation. A separate and less accurate dataset was used to estimate the number of engines arriving and departing from a site. These data, however, often do not produce matching arrivals and departures. ENVIRON adopted a conservative approach based on using the higher of the arrival or departure numbers, which may have resulted in overestimates of the number of engines arriving.

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 between idling with the engine on and idling with the engine off. As a result, ENVIRON used professional judgment to distinguish between these two modes. In addition, no idle time reduction was assumed in the future year scenarios, despite the fact that BNSF has initiated programs to reduce idling through installation of automatic start/stop devices and other operational changes to reduce idling. So 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.

The most significant non-locomotive sources at the rail yards are on-road trucks, cargo handling equipment, and transport refrigeration units used at intermodal facilities. Activity levels of these vehicles and equipment are estimated relatively accurately, however the duty cycles (engine load demanded) are less well characterized. Default estimates of the duty cycle may not accurately reflect the typical duty demanded from these vehicles and equipment at any particular site. New emissions models for these sources have recently been provided for use in this study by ARB. In many cases, these revised models reflect a dramatic change in emission factors from previous versions of the models and it is therefore reasonable to expect that future revisions to these models may result in further changes to emission estimates for on-road and off-road engines. 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. The effects of these

regulations have, for the most part, not been incorporated in the emission estimates, and so estimated emissions are greater than those expected for future years at the same activity level.

5.2 Estimation of Exposure Concentrations

5.2.1 Estimates from Air Dispersion Models

As discussed in Section 4.0, USEPA-recommended dispersion model AERMOD was used to estimate annual average off-site chemical exposure concentrations at the various off-site receptor locations. This model uses the Gaussian plume equation to calculate ambient air concentrations from emission sources. For this model, the magnitude of error for the maximum concentration is estimated to range from 10 to 40% (USEPA 2005b). Therefore, off-site exposure concentrations used in this assessment represent approximate off-site exposure concentrations.

5.2.2 Source Placement

Uncertainty exists in the placement of emission sources at the Facility. As a large amount of locomotive and on- and off-road engine activity at a rail yard is engaged in movement, the distribution of emissions during movement in the yards is an important source of uncertainty. Unlike fixed stationary sources, emissions from movement would occur over a continuum rather than as discrete points. However, regulatory approved models were originally developed for the evaluation of fixed stationary sources and the use of a continuum of source locations to model emissions during movement of sources results in an unacceptably large number (in the tens of thousands) of sources that would result in unwieldy post-processing data needs and unacceptable modeling run times (on the order of months rather than hours or days).

In this assessment, point and volume sources were spaced evenly at approximately 50-meter intervals similar to ARB's Roseville Study (ARB 2004) over rail locations where locomotive and on- and off-road activities occurred. Closer spacing between point and volume sources may impact the predicted concentrations at receptor locations near the Facility boundary. Sensitivity analyses performed to determine the potential impact of source placement on predicted concentrations at receptors near the Facility boundary (see Appendix C of ENVIRON's BNSF Commerce/Mechanical Report [ENVIRON 2006b]) indicated that concentrations at receptors nearest to the specific emission sources could be over-predicted by at least 10 percent.

5.2.3 Source Representation

The source parameters (i.e., release velocity and release temperature) used to model stationary locomotive activities are sources of uncertainty. Following ARB guidance (ARB 2006a), fleet-average source parameters were calculated to reduce the large number of potential source parameter configurations related to stationary locomotive activities at Commerce/Eastern. The specific methodology used for calculating fleet-averaged source parameters is presented in Section 4.3.1.1. The use of fleet-average source parameters for stationary locomotive activities resulted in approximate predictions for these sources.

The release heights and vertical dimensions used for movement sources at the Facility are also sources of uncertainty. ARB calculated adjustments to the release height and vertical dimension for movement sources for individual engine models based on locomotive notch settings (i.e., locomotive travel speeds) and using two different stability classes for their Roseville study (ARB 2004). This methodology resulted in several uncertainties. ARB's methodology assumed that the wind speed was equal to the locomotive speed and did not account for variability in either the locomotive speed or hourly wind speeds. In addition, ARB's methodology assumed only two stability classes (i.e., class "D" for daytime and class "F" for nighttime), and did not account for potential variability in stability class during these time periods based local meteorological data. Nevertheless, ENVIRON calculated plume rise adjustments using a methodology similar to ARB's, described in more detail in Section 4.3.1.2, for locomotive movement activities and on-road diesel and gasoline vehicle movement sources at the Facility. Thus, the use of plume rise adjustments resulted in approximate predictions of receptor concentrations for these sources.

The use of area sources to represent emissions sources operating in areas where travel paths are not well defined or equipment usage may occur over the entire operating area are additional sources of uncertainty related to source representation. At the BNSF Commerce/Eastern Yard, area sources were used to represent cargo handling equipment, transportation refrigeration units, on-road container truck idling and movement in the intermodal area, on-road fleet vehicle movement activities, and track maintenance equipment, which account for approximately 75 percent of total DPM emissions from the Rail Yard. Based on guidance in the draft Guidelines (ARB 2006a), these source activities may be modeled as either area or volume sources. The AERMOD model uses very different methodologies to estimate dispersion from area and volume sources (USEPA 2004c), and the use of area sources generally results in higher (more conservative) concentration estimates. Thus, the use of area sources to represent cargo handling equipment, transportation refrigeration units, on-road container truck idling and movement in the intermodal area, on-road fleet vehicle movement activities, and track maintenance equipment at

Commerce/Eastern generally resulted in over-predictions of receptor concentrations for these source activities.

5.2.4 Meteorological Data Selection

Uncertainty also exists in the meteorological data used in the AERMOD air dispersion model. These uncertainties are related to the use of meteorological data that is not site-specific, combination of surface data from two meteorological stations, substitution of missing meteorological data, and use of surface parameters for the meteorological station as opposed to the rail yard.

ENVIRON selected meteorological data for air dispersion modeling based upon their spatial and temporal representativeness of conditions in the immediate vicinity of the rail yard. On-site meteorological data was not available for the rail yard. Therefore, the meteorological data used in this analysis was based on surface meteorological data from ARB's Lynwood station (approximately nine kilometers from the rail yard) and the NCDC/NWS station at Los Angeles-Downtown USC (approximately nine kilometers from the rail yard) and upper air data from San Diego-Miramar Naval Air Station. A complete set of surface meteorological data was not available at either Lynwood or Los Angeles-Downtown USC, therefore wind speed and wind direction data from Lynwood were combined with temperature, pressure, and cloud cover data from Los Angeles-Downtown USC. Meteorological surface measurements from the Lynwood and Los Angeles-Downtown USC stations were not 100% complete for all modeled years, therefore missing data were substituted using procedures outlined in Atkinson & Lee (1992). Surface parameters supplied to AERMET, the meteorological preprocessor to AERMOD, were specified for the area surrounding the meteorological monitoring site (Lynwood station), rather than the project area (rail yard), as recommended by USEPA (USEPA 2005a) and ARB.⁸ However, because the selected meteorological station is in very close proximity to the Commerce/Eastern and the land use surrounding the meteorological station is very similar to the land use surrounding Commerce/Eastern, surface parameters calculated for the meteorological station should be representative of Commerce/Eastern. The uncertainties due to the use of non-site-specific meteorological data, combination of surface data from different stations, substitution of missing surface data, and use of surface parameters for the meteorological station resulted in approximate exposure concentrations.

⁸ Personal communication, J. Yuan of ARB by e-mail to D. Daugherty of ENVIRON on August 3, 2006.

5.2.5 Building Downwash

The spacing and placement of point sources relative to buildings or structures results in impacts to building downwash parameters and resulting modeling concentrations. Based on the results of ENVIRON's sensitivity analyses discussed in Appendix G of ENVIRON's BNSF Commerce/Mechanical Report (ENVIRON 2006b), the uncertainty in placing locomotive structures in areas where stationary locomotives occur, and the fact that many of the stationary locomotive activities occur in the interior of the rail yard, ENVIRON did not include building downwash effects due to locomotives in this assessment. Also, because specific locations for most stationary locomotive activities were not available, point sources representing these activities were distributed evenly over the areas where these operations occurred, as described in Section 4.3.1.1. These assumptions and modeling techniques resulted in approximate predictions of receptor concentrations near the facility boundary, as described in further detail below.

5.2.6 Uncertainty in Points of Maximum Impact

Receptor concentration estimates in close proximity to the facility, such as any potential point of maximum impact (PMI), are highly dependent on air dispersion modeling assumptions. That is, different modeling assumptions regarding the spatial and temporal distributions of the emission sources can greatly influence the resulting concentration estimates in proximity to the emission sources, including the magnitude and location of the PMI. As discussed in Section 5.2.2, there is significant uncertainty associated with identification of and estimation of impacts at locations near to a mobile source facility due to the complexity associated with modeling sources that can move (i.e., volume or line sources representing mobile sources). The potential influence of modeling techniques used in this assessment were evaluated in a sensitivity analyses performed for two different movement activities at Commerce/Mechanical, presented in Appendix C of ENVIRON's BNSF Commerce/Mechanical Report (ENVIRON 2006b). These two analyses illustrated the particular sensitivities in assessment of receptors near a rail yard's boundary to source representation (i.e., source spacing, and source sizing for approximation of mobile sources) in the modeling and how source simplification assumptions generally result in over-prediction of concentrations near to the rail yards. Other modeling techniques and assumptions used in this assessment, including fleet-averaging of stationary locomotive activity source parameters, plume rise adjustments to locomotive and on-road diesel and gasoline vehicle movement sources, the use of area sources to represent emissions sources operating in areas where travel paths are not well defined or equipment usage may occur over the entire area, as described above, also contribute to uncertainty to modeling predictions for receptors near the boundary of the rail yard.

Focusing on receptor locations at a greater distance (i.e., one to two kilometers) from the facility reduces the overall influence on the proximity to specific site operations. The two sensitivity analyses discussed above, and presented in more detail in ENVIRON's BNSF Commerce/Mechanical Report (ENVIRON 2006b), indicated that concentrations were over-predicted by 21% and 17% at the PMI. However, at distances one to two kilometers from the facility, receptor concentrations for the two source configurations were all within one to five percent of each other. Thus, the results of these two sensitivity analyses indicated that concentrations at receptors further from the sources are much less sensitive to air dispersion assumptions regarding the spatial and temporal distributions of emission sources.

5.2.7 Estimation of Maximum One-Hour TAC Concentrations

ENVIRON evaluated a large number of non-DPM TACs in this assessment from non-DPM sources (mainly from gasoline engine emissions) as identified in the speciation profiles discussed in Appendix A. In order to substantially reduce modeling complexity and run time, maximum one-hour TOG exhaust, TOG evaporative, and PM exhaust emission rates (as opposed to maximum one-hour individual TAC emission rates) were input into the air dispersion model. Speciation profiles containing the fractions of individual TACs for TOG exhaust, TOG evaporative, and PM exhaust emissions (discussed in Appendix A) were then applied to the TOG exhaust, TOG evaporative, and PM exhaust concentrations estimated by the dispersion model to calculate concentrations of individual TACs. This methodology resulted in conservative estimates (i.e., over-predictions) of the maximum one-hour concentrations for individual TACs.

5.3 Risk Characterization

As stated previously, ARB will conduct the risk characterization part of the HRA based on the results of the emissions estimation and air dispersion modeling provided by ENVIRON. Consistent with the Agreement and draft Guidelines (ARB 2005b, 2006a), the risk characterization activities conducted by ARB will include evaluating and reporting the uncertainties associated with the estimated risks for each designated rail yard. As discussed in detail above, there are many uncertainties associated with the estimation of emissions and exposure point concentrations from rail yard emission sources that would be in addition to the uncertainties associated with the exposure assumptions and toxicity information to be used in ARB's estimation of risks. Many of these uncertainties lead to an over-prediction of the estimated offsite impacts. At the request of ARB, ENVIRON will assist ARB in identifying the critical assumptions and uncertainties associated with the risk characterization step of the HRA. This evaluation will be conducted concurrent with the ARB risk characterization activities and will be provided to ARB in a separate submittal.

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Table 2-1
Percentages of Land Use Categories Within Twenty Kilometers of Facility
BNSF Commerce Eastern
Commerce, California

Land Use Category ¹	Percentage (%)
Open water	0.24%
Low Intensity Residential	39.09%
High Intensity Residential	18.01%
Commercial/Industrial/Transportation	22.17%
Bare Rock/Sand/Clay	1.48%
Quarries/Strip Mines/Gravel Pits	0.00%
Transitional	0.00%
Deciduous Forest	0.14%
Evergreen Forest	0.77%
Mixed Forest	2.11%
Shrubland	10.44%
Orchards/Vineyards/Other	0.01%
Grasslands/Herbaceous	3.19%
Pasture/Hay	0.13%
Row Crops	0.05%
Small Grains	0.03%
Fallow	0.00%
Urban/Recreational Grasses	2.12%
Woody Wetlands	0.01%
Emergent Herbaceous Wetlands	0.01%

Notes:

¹ Land use data are based on National Land Cover Data 1992 from US Geological Survey.

Table 3-1a
Summary of Emissions and Operating Hours for Modeled DPM Emission Sources
BNSF Commerce Eastern
Commerce, California

Emission Source	Activity Category	Activity Category Description	Activity Sub-Category	Activity Subcategory Description	Modeling Source Type	Operation Mode	Modeling Source Group ¹	Total Emissions (g)	Days of Operation Per Week	Hours of Operation Per Day	Modeled Area (m ²)	Total Emission rate ^{2,3} (g/s) or (g/m ² /s)	Number of Modeled Sources	Emission Rate Applied to Period-Average Dispersion Factors ⁴ (g/s)
Locomotives	D	Switching	D	Switching	Point	Idle	15I	62,503	7	8 - 18	--	1.98E-03	38	5.22E-05
					Volume	Dynamic Brake	15D	65	7	8 - 18	--	2.08E-06	19	1.09E-07
					Volume	Notch 1	151	10,702	7	8 - 18	--	3.39E-04	19	1.79E-05
					Volume	Notch 2	152	44,511	7	8 - 18	--	1.41E-03	19	7.43E-05
					Volume	Notch 3	153	34,581	7	8 - 18	--	1.10E-03	19	5.77E-05
					Volume	Notch 4	154	20,524	7	8 - 18	--	6.51E-04	19	3.43E-05
					Volume	Notch 5	155	5,573	7	8 - 18	--	1.77E-04	19	9.30E-06
					Volume	Notch 6	156	3,278	7	8 - 18	--	1.04E-04	19	5.47E-06
					Volume	Notch 7	157	2,148	7	8 - 18	--	6.81E-05	19	3.59E-06
					Volume	Notch 8	158	3,899	7	8 - 18	--	1.24E-04	19	6.51E-06
	E	Arriving and Departing Trains	E	BNSF Arriving-Departing Line Haul	Point	Idle	16I	93,891	7	24	--	2.98E-03	96	3.10E-05
					Volume	Dynamic Brake	16D	11,047	7	24	--	3.50E-04	24	1.46E-05
					Volume	Notch 1	161	31,983	7	24	--	1.01E-03	24	4.23E-05
					Volume	Notch 2	162	29,731	7	24	--	9.43E-04	24	3.93E-05
					Volume	Notch 3	163	24,795	7	24	--	7.86E-04	24	3.28E-05
					Volume	Notch 4	164	5,193	7	24	--	1.65E-04	24	6.86E-06
	F	Adjacent Freight Movements	F	BNSF Passing Line Haul	Volume	Dynamic Brake	17D	87,413	7	24	--	2.77E-03	24	1.15E-04
				Non-BNSF Passing Line Haul	Volume	Dynamic Brake	18D	362	7	24	--	1.15E-05	24	4.79E-07
	G	Adjacent Commuter Rail Operations	G	Passenger locomotives (AMTRAK/Metrolink)	Volume	Dynamic Brake	19D	22,347	7	24	--	7.09E-04	24	2.95E-05
Cargo Handling Equipment	H	Cargo Handling Equipment Operations	H	Lift Machines	Area	--	21	163,850	7	24	53,829	9.65E-08	--	5.20E-03
				Hostlers	Area	--	23	175,781	7	24	200,806	2.78E-08	--	5.57E-03
On-Road Container Trucks ⁵	I	On-Road Container Truck Operations	I	On-Road Container Trucks	Volume	Entrance / Exit Queue	31V	165,756	7	24	--	5.26E-03	6	8.76E-04
					Area	On-site Idle and Movement	31A	861,884	7	24	200,806	1.36E-07	--	2.73E-02
On-Road Fleet	J	On-Road Fleet Vehicle	J	BNSF On-Road Fleet	Area	--	29	39	7	12	200,806	6.11E-12	--	1.23E-06
Off-Road Equipment	K	Other Off-Road		Container TRUs	Area	--	34	876,504	7	24	226,413	1.23E-07	--	2.78E-02
				Track Maintenance Equipment	Area	--	27	6,258	7	12	25,607	7.75E-09	--	1.98E-04

Notes:

1. "Modeling Source Group" corresponds to the modeling source group name in the AERMOD input and output files.
2. The "Total Emission Rate" is calculated based on the "Total Emissions" divided by 8760 hours per year divided by 3600 seconds per hour. The temporal profiles created for activities with emissions that are not uniform over time or do not occur 24 hours a day/7 days a week account for variations of activity by the hour. Temporal profiles are included for switching, line haul, commuter locomotive, on-road container trucks, on-road fleet vehicles, and track maintenance equipment. Profiles are included in Appendix B.
3. The "Total Emission Rate" units are "grams per second" for point and volume sources and "grams per meter squared per second" for area sources.
4. The "Emission Rate Applied to Period-Average Dispersion Factors" is the emission rate applied to the modeled period-average dispersion factors for each source group to estimate air concentrations. For point and volume sources, the "Emission Rate Applied to Period-Average Dispersion Factors" is equal to the Total Emission Rate" divided by the "Number of Modeled Emission Sources"; For area sources, the "Emission Rate Applied to Period-Average Dispersion Factors" is equal to the Total Emission Rate" multiplied by the modeled area.
5. On-Road Container Trucks modeled as volume sources (along distinguishable travel paths) and area sources (for travel in larger areas without distinguishable paths).

Table 3-1b
Summary of Emissions and Operating Hours For Modeled Gasoline Emission Sources
BNSF Commerce Eastern
Commerce, California

Activity Sub-category	Activity Subcategory Description	Modeling Source Type	Modeling Source Group ¹	Total Emissions (g)	Days of Operation Per Week	Hours of Operation Per Day	Modeled Area (m ²)	Total Emission Rate ^{2,3} (g/m ² /s)	Number of Modeled Sources	Emission Rate Applied to Period-Average Dispersion Factors ⁴ (g/s)	Hourly Maximum Emission Rate ⁵ (g/s) or (g/m ² /s)
Gasoline PM (ARB Speciate Profile #400)											
K2	Track Maintenance Equipment	Area	PM	5	5	12	25,607	6.06E-12		1.55E-07	6.06E-12
J	On-Road Fleet	Area		8	5	12	200,806	1.25E-12		2.52E-07	1.25E-12
TOG Evaporative (ARB Speciate Profile #422)											
K2	Track Maintenance Equipment	Area	EV	30	5	12	25,607	3.69E-11		9.46E-07	3.69E-11
J	On-Road Flee t	Area		303	5	12	200,806	4.78E-11		9.60E-06	4.78E-11
TOG Exhaust (ARB Speciate Profile #2105)											
K2	Track Maintenance Equipment	Area	EX	169	5	12	25,607	2.10E-10		5.37E-06	2.10 E-10
J	On-Road Fleet	Area		309	5	12	200,806	4.88E-11		9.80E-06	4.88E-11

Notes:

1. "Modeling Source Group" corresponds to the modeling source group name in the AERMOD input and output files.
2. The "Total Emission Rate" is calculated based on the "Total Emissions" divided by 8760 hours per year divided by 3600 seconds per hour. The temporal profiles created for activities with emissions that are not uniform over time or do not occur 24 hours a day/7 days a week account for variations of activity by the hour. Temporal profiles are included for on-road fleet vehicles and track maintenance equipment. Profiles are included in Appendix B.
3. The "Total Emission Rate" units are "grams per second" for point and volume sources and "grams per meter squared per second" for area sources.
4. The "Emission Rate Applied to Period-Average Dispersion Factors" is the emission rate applied to the modeled period-average dispersion factors for each source group to estimate air concentrations. For point and volume sources, the "Emission Rate Applied to Period-Average Dispersion Factors" is equal to the Total Emission Rate" divided by the "Number of Modeled Emission Sources"; For area sources, the "Emission Rate Applied to Period-Average Dispersion Factors" is equal to the Total Emission Rate" multiplied by the modeled area.
5. The "Hourly Maximum Emission Rate" is the emission rate used in the air dispersion model. For point and volume sources, the "Hourly Maximum Emission Rate" is equal to the "Emission Rate Applied to Period-Average Dispersion Factors). For area sources, the "Hourly Maximum Emission Rate" is equal to the "Total Emission Rate.

Table3-2
Summary of Activity Category Total Annual DPM and TOG Emissions at the Facility
BNSF Commerce Eastern
Commerce, California

Activity Category	Activity Category Description	Diesel			Gasoline								
		PM Emissions			PM Emissions			TOG Evaporative Emissions			TOG Exhaust Emissions		
		Grams	Metric Tons	Percentage (%)	Grams	Metric Tons	Percentage (%)	Grams	Metric Tons	Percentage (%)	Grams	Metric Tons	Percentage (%)
D	Locomotive Switching	187,785	0.19	6.8%	-	-	-	-	-	-	-	-	-
E	Arriving and Departing Trains	196,639	0.20	7.2%	-	-	-	-	-	-	-	-	-
F	Adjacent Freight Movements	87,775	0.09	3.2%	-	-	-	-	-	-	-	-	-
G	Adjacent Commuter Rail Operations	22,347	0.02	0.8%	-	-	-	-	-	-	-	-	-
H	Cargo Handling Equipment Operations	339,632	0.34	12.4%	-	-	-	-	-	-	-	-	-
I	On-Road Container Truck Operations	1,027,640	1.03	37.4%	-	-	-	-	-	-	-	-	-
J	On-Road Fleet Vehicles	39	0.00	0.00%	8	7.94E-06	61.8%	303	3.03E-04	91.0%	309	3.09E-04	64.6 %
K	Off-Road Equipment	882,762	0.88	32.2%	5	4.90E-06	38.2%	30	2.98E-05	9.0%	169	1.69E-04	35.4%
	TOTAL	2,744,619	2.74	100.0 %	13	1.28E-05	100%	332	3.32E-04	100%	479	4.79E-04	100%

Table 4-1
Fleet-Average Source Parameters for Locomotive Activities
BNSF Commerce Eastern
Commerce, California

Activity Subcategory	Activity Subcategory Description	Modeling Source Type	Operation Mode	Stack Height (m)	Exit Temperature (K)	Exit velocity (m/s)	Exit Diameter (m)	Initial Lateral Dimension (m)	Day		Night	
									Release Height (m)	Initial Vertical Dimension (m)	Release Height (m)	Initial Vertical Dimension (m)
D	Switching	Point	Idle	4.52	362	15.56	0.29	-	-	-	-	-
D	Switching	Volume	Dynamic Brake	-	-	-	-	0.58 - 6.55	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 1	-	-	-	-	0.58 - 6.56	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 2	-	-	-	-	0.58 - 6.57	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 3	-	-	-	-	0.58 - 6.58	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 4	-	-	-	-	0.58 - 6.59	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 5	-	-	-	-	0.58 - 6.60	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 6	-	-	-	-	0.58 - 6.61	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 7	-	-	-	-	0.58 - 6.62	15.1	3.51	24.5	5.70
D	Switching	Volume	Notch 8	-	-	-	-	0.58 - 6.63	15.1	3.51	24.5	5.70
E	BNSF Arriving-Departing Line Haul	Point	Idle	4.52	398	2.5	0.61	-	-	-	-	-
E	BNSF Arriving-Departing Line Haul	Volume	Dynamic Brake	-	-	-	-	2.7	4.60	1.07	8.54	1.99
E	BNSF Arriving-Departing Line Haul	Volume	Notch 1	-	-	-	-	2.7	4.60	1.07	8.54	1.99
E	BNSF Arriving-Departing Line Haul	Volume	Notch 2	-	-	-	-	2.7	4.60	1.07	8.54	1.99
E	BNSF Arriving-Departing Line Haul	Volume	Notch 3	-	-	-	-	2.7	4.60	1.07	8.54	1.99
E	BNSF Arriving-Departing Line Haul	Volume	Notch 4	-	-	-	-	2.7	4.60	1.07	8.54	1.99
F	BNSF Passing Line Haul	Volume	Dynamic Brake	-	-	-	-	2.7	4.55	1.06	8.62	2.00
F	Non-BNSF Passing Line Haul	Volume	Dynamic Brake	-	-	-	-	2.7	4.55	1.06	8.61	2.00
G	Passenger locomotives (AMTRAK/Metrolink)	Volume	Dynamic Brake	-	-	-	-	2.7	4.56	1.06	9.27	2.16

Table 4-2
Plume Rise Adjustments for Locomotive Movement Source
BNSF Commerce Eastern
Commerce, California

Activity Subcategory	Activity Subcategory Description	Modeled Notch Setting ²	Locomotive Speed (mph)	Locomotive Speed (m/s)	Modeled Locomotive Type	Plume Height ³ (m)			Initial Vertical Dimension (m)		
						Stability D	Stability F	Adjusted F ⁴	Stability D	Stability F	Adjusted F ⁴
D	Switching	2	5	2.24	Fleet-Average	18.1	24.5	-	3.51	5.70	-
E	BNSF Arriving-Departing Line Haul	1	20	8.94		4.60	12.9	8.54	1.07	2.99	1.99
F	BNSF Passing Line Haul	DB	30	13.4		4.55	14.3	8.62	1.06	3.32	2.00
F	Non-BNSF Passing Line Haul	DB	30	13.4		4.55	14.2	8.61	1.06	3.31	2.00
G	Passenger locomotives (AMTRAK/MetroLink)	DB	30	13.4		4.56	15.8	9.27	1.06	3.67	2.16

Notes:

1. Plume rise calculated using USEPA's SCREEN3 model using methodology in ARB's Roseville Study (ARB 2004).
2. Due to sensitivity of plume rise to wind speed and locomotive speed, plume rise adjustments calculated for only one notch setting per source subactivity. For source subactivities with multiple notch settings, the source parameters for the notch setting with the greatest percentage of activity emission were selected.
3. Plume Height physical height of locomotive plus plume rise.
4. The maximum wind speed for stability category F in SCREEN3 is 4.0 m/s. For locomotive speeds (i.e., effective wind speeds) greater than 4.0 m/s, the plume rise for stability category F was adjusted according to the methodology in the ARB Roseville Study (ARB 2004): adjusted plume rise = plume rise x (1/locomotive speed)^(1/3)

Source:

1. Air Resources Board (ARB). 2004. Roseville Rail Yard Study. October 2004

Table 4-3
Source Parameters for Cargo Handling Equipment, On-Road Container Trucks, and Off-Road Equipment
BNSF Commerce Eastern
Commerce, California

Activity Subcategory	Activity Subcategory Description	Modeling Source Type	Initial Lateral Dimension (m)	Day		Night	
				Release Height ¹ (m)	Initial Vertical Dimension ² (m)	Release Height ¹ (m)	Initial Vertical Dimension ² (m)
H	Cargo Handling: Lift Machines	Area	-	3.90	0.91	3.90	0.91
H	Cargo Handling: Hostlers	Area	-	0.60	0.14	0.60	0.14
I	On-Road Container Trucks: Idling at entrance/exit (ingress)	Volume	1.15 - 2.30	4.0	0.93	6.0	1.40
	On-Road Container Trucks: Travel on site/Idling on site	Area	-	4.0	0.93	6.0	1.40
K1	TRU - Containers	Area	-	1.00	0.23	1.00	0.23
K2	Track Maintenance Equipment	Area	-	4.55	1.06	4.55	1.06

Notes:

1. Assumed release height for track maintenance equipment equal to the lowest plume height from plume rise adjustments for locomotive sources.
2. Initial vertical dimension for all sources calculated as release height divided by 4.3 based on USEPA guidance (USEPA 2004) for elevated volume and area sources not on or adjacent to a building.

Source:

1. United States Environmental Protection Agency (USEPA). 2004. User's Guide for the AMS/EPA Regulatory Model - AERMOD. Office of Air Quality Planning and Standards. Emissions Monitoring and Analysis Division. Research Triangle Park, North Carolina. EPA-454/B-03-001. September.

Table 4-4
Source Parameters for On-Road Fleet
BNSF Commerce Eastern
Commerce, California

Activity Subcategory	Activity Subcategory Description	Modeling Source Type ¹	Initial Lateral Dimension (m)	Day		Night	
				Release Height ² (m)	Initial Vertical Dimension (m)	Release Height ² (m)	Initial Vertical Dimension (m)
J	On-Road Fleet	Area	-	0.60	0.14	0.60	0.14

Notes:

1. On-Road Fleet modeled as area sources (for travel in areas without distinguishable paths).
2. Release height based on ARB Risk Reduction Plan (ARB 2000) and recommendations from ARB staff.
3. Initial vertical dimension for all sources calculated as release height divided by 4.3 based on USEPA guidance (USEPA 2004) for elevated volume and area sources not on or adjacent to a building.

Sources:

1. Air Resources Board (ARB). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Appendix VII: Risk Characterization Scenarios. October.
2. United States Environmental Protection Agency (USEPA). 2004. User's Guide for the AMS/EPA Regulatory Model - AERMOD. Office of Air Quality Planning and Standards. Emissions Monitoring and Analysis Division. Research Triangle Park, North Carolina. EPA-454/B-03-001. September.

Table 4-5
Sector-Specific Surface Roughness, Bowen Ratio, and Albedo
BNSF Commerce Eastern
Commerce, California

Month	Sector No.	2002			2003			2004			2005		
		Albedo	Bowen Ratio	Surface Roughness	Albedo	Bowen Ratio	Surface Roughness	Albedo	Bowen Ratio	Surface Roughness	Albedo	Bowen Ratio	Surface Roughness
Jan	1	0.18	2.15	0.95	0.18	4.21	0.95	0.18	2.15	0.95	0.18	2.15	0.95
Feb		0.15	2.11	0.95	0.15	1.08	0.95	0.15	1.08	0.95	0.15	0.52	0.95
Mar		0.15	2.11	0.95	0.15	1.08	0.95	0.15	1.08	0.95	0.15	0.52	0.95
Apr		0.17	4.02	0.96	0.17	2.05	0.96	0.17	4.02	0.96	0.17	4.02	0.96
May		0.17	4.02	0.96	0.17	2.05	0.96	0.17	4.02	0.96	0.17	4.02	0.96
Jun		0.17	4.02	0.96	0.17	2.05	0.96	0.17	4.02	0.96	0.17	4.02	0.96
Jul		0.17	4.11	0.95	0.17	4.11	0.95	0.17	1.02	0.95	0.17	4.11	0.95
Aug		0.17	4.11	0.95	0.17	4.11	0.95	0.17	1.02	0.95	0.17	4.11	0.95
Sep		0.17	4.11	0.95	0.17	4.11	0.95	0.17	1.02	0.95	0.17	4.11	0.95
Oct		0.17	4.11	0.95	0.17	4.11	0.95	0.17	1.02	0.95	0.17	4.11	0.95
Nov		0.18	2.15	0.95	0.18	4.21	0.95	0.18	2.15	0.95	0.18	2.15	0.95
Dec		0.18	2.15	0.95	0.18	4.21	0.95	0.18	2.15	0.95	0.18	2.15	0.95
Jan	2	0.19	2.33	0.91	0.19	4.46	0.91	0.19	2.33	0.91	0.19	2.33	0.91
Feb		0.16	2.24	0.91	0.16	1.16	0.91	0.16	1.16	0.91	0.16	0.54	0.91
Mar		0.16	2.24	0.91	0.16	1.16	0.91	0.16	1.16	0.91	0.16	0.54	0.91
Apr		0.17	4.07	0.91	0.17	2.12	0.91	0.17	4.07	0.91	0.17	4.07	0.91
May		0.17	4.07	0.91	0.17	2.12	0.91	0.17	4.07	0.91	0.17	4.07	0.91
Jun		0.17	4.07	0.91	0.17	2.12	0.91	0.17	4.07	0.91	0.17	4.07	0.91
Jul		0.18	4.27	0.91	0.18	4.27	0.91	0.18	1.04	0.91	0.18	4.27	0.91
Aug		0.18	4.27	0.91	0.18	4.27	0.91	0.18	1.04	0.91	0.18	4.27	0.91
Sep		0.18	4.27	0.91	0.18	4.27	0.91	0.18	1.04	0.91	0.18	4.27	0.91
Oct		0.18	4.27	0.91	0.18	4.27	0.91	0.18	1.04	0.91	0.18	4.27	0.91
Nov		0.19	2.33	0.91	0.19	4.46	0.91	0.19	2.33	0.91	0.19	2.33	0.91
Dec		0.19	2.33	0.91	0.19	4.46	0.91	0.19	2.33	0.91	0.19	2.33	0.91
Jan	3	0.19	2.35	0.92	0.19	4.51	0.92	0.19	2.35	0.92	0.19	2.35	0.92
Feb		0.16	2.26	0.92	0.16	1.17	0.92	0.16	1.17	0.92	0.16	0.54	0.92
Mar		0.16	2.26	0.92	0.16	1.17	0.92	0.16	1.17	0.92	0.16	0.54	0.92
Apr		0.17	4.14	0.92	0.17	2.16	0.92	0.17	4.14	0.92	0.17	4.14	0.92
May		0.17	4.14	0.92	0.17	2.16	0.92	0.17	4.14	0.92	0.17	4.14	0.92
Jun		0.17	4.14	0.92	0.17	2.16	0.92	0.17	4.14	0.92	0.17	4.14	0.92
Jul		0.18	4.33	0.92	0.18	4.33	0.92	0.18	1.06	0.92	0.18	4.33	0.92
Aug		0.18	4.33	0.92	0.18	4.33	0.92	0.18	1.06	0.92	0.18	4.33	0.92
Sep		0.18	4.33	0.92	0.18	4.33	0.92	0.18	1.06	0.92	0.18	4.33	0.92
Oct		0.18	4.33	0.92	0.18	4.33	0.92	0.18	1.06	0.92	0.18	4.33	0.92
Nov		0.19	2.35	0.92	0.19	4.51	0.92	0.19	2.35	0.92	0.19	2.35	0.92
Dec		0.19	2.35	0.92	0.19	4.51	0.92	0.19	2.35	0.92	0.19	2.35	0.92
Jan	4	0.19	2.49	0.87	0.19	4.71	0.87	0.19	2.49	0.87	0.19	2.49	0.87
Feb		0.16	2.36	0.87	0.16	1.24	0.87	0.16	1.24	0.87	0.16	0.56	0.87
Mar		0.16	2.36	0.87	0.16	1.24	0.87	0.16	1.24	0.87	0.16	0.56	0.87
Apr		0.18	4.16	0.87	0.18	2.21	0.87	0.18	4.16	0.87	0.18	4.16	0.87
May		0.18	4.16	0.87	0.18	2.21	0.87	0.18	4.16	0.87	0.18	4.16	0.87
Jun		0.18	4.16	0.87	0.18	2.21	0.87	0.18	4.16	0.87	0.18	4.16	0.87
Jul		0.19	4.44	0.87	0.19	4.44	0.87	0.19	1.07	0.87	0.19	4.44	0.87
Aug		0.19	4.44	0.87	0.19	4.44	0.87	0.19	1.07	0.87	0.19	4.44	0.87
Sep		0.19	4.44	0.87	0.19	4.44	0.87	0.19	1.07	0.87	0.19	4.44	0.87
Oct		0.19	4.44	0.87	0.19	4.44	0.87	0.19	1.07	0.87	0.19	4.44	0.87
Nov		0.19	2.49	0.87	0.19	4.71	0.87	0.19	2.49	0.87	0.19	2.49	0.87
Dec		0.19	2.49	0.87	0.19	4.71	0.87	0.19	2.49	0.87	0.19	2.49	0.87
Jan	5	0.18	2.14	0.97	0.18	4.20	0.97	0.18	2.14	0.97	0.18	2.14	0.97
Feb		0.15	2.10	0.97	0.15	1.07	0.97	0.15	1.07	0.97	0.15	0.52	0.97
Mar		0.15	2.10	0.97	0.15	1.07	0.97	0.15	1.07	0.97	0.15	0.52	0.97
Apr		0.16	4.05	0.97	0.16	2.06	0.97	0.16	4.05	0.97	0.16	4.05	0.97
May		0.16	4.05	0.97	0.16	2.06	0.97	0.16	4.05	0.97	0.16	4.05	0.97
Jun		0.16	4.05	0.97	0.16	2.06	0.97	0.16	4.05	0.97	0.16	4.05	0.97
Jul		0.17	4.12	0.97	0.17	4.12	0.97	0.17	1.02	0.97	0.17	4.12	0.97
Aug		0.17	4.12	0.97	0.17	4.12	0.97	0.17	1.02	0.97	0.17	4.12	0.97
Sep		0.17	4.12	0.97	0.17	4.12	0.97	0.17	1.02	0.97	0.17	4.12	0.97
Oct		0.17	4.12	0.97	0.17	4.12	0.97	0.17	1.02	0.97	0.17	4.12	0.97
Nov		0.18	2.14	0.97	0.18	4.20	0.97	0.18	2.14	0.97	0.18	2.14	0.97
Dec		0.18	2.14	0.97	0.18	4.20	0.97	0.18	2.14	0.97	0.18	2.14	0.97

Table 4-6
Approximate Dimensions of Buildings at the Facility
BNSF Commerce Eastern
Commerce, California

Building/ Structure ID	Structure Name	Approximate Footprint Dimensions¹ (meters)	Height² (meters)
1	Hub Administration	20 x 13	3.4
2	Equipment Maintenance	22 x 16	6.6

Notes:

1. Approximate footprint dimensions estimated based on aerial photograph of facility.
2. Building heights provided by BNSF personnel unless otherwise indicated.

Table 4-7
Locations of Sensitive Receptors Within One Mile of the Facility¹
BNSF Commerce Eastern
Commerce, California

Sensitive Receptor Name	Address	UTMx (m)	UTMy (m)	Receptor Type
Bandini Elementary	2318 Coutts Ave , Commerce, CA	392126.2	3763445.5	Public School
Childtime Children's Center	4820 S. Eastern Ave, Commerce, CA	392731 .6	3761418.5	ChildCareCenter
City of Commerce Head Start/ABC Child Development Ctr	5102 Kinsie St, Los Angeles, CA	392280.5	3763322.2	Child Care Center
Rosewood Park Elementary	2353 Commerce Way, Commerce, CA	393454 .8	3763166.9	Public School
Vail High (Continuation)	1230 S. Vail Ave, Montebello, CA	395688.2	3761963.6	Public School
YMCA Montebello-Commerce Preschool & Child Dev	2353 S. Commerce Way, Commerce, CA	393454.8	3763166.9	Child Care Center

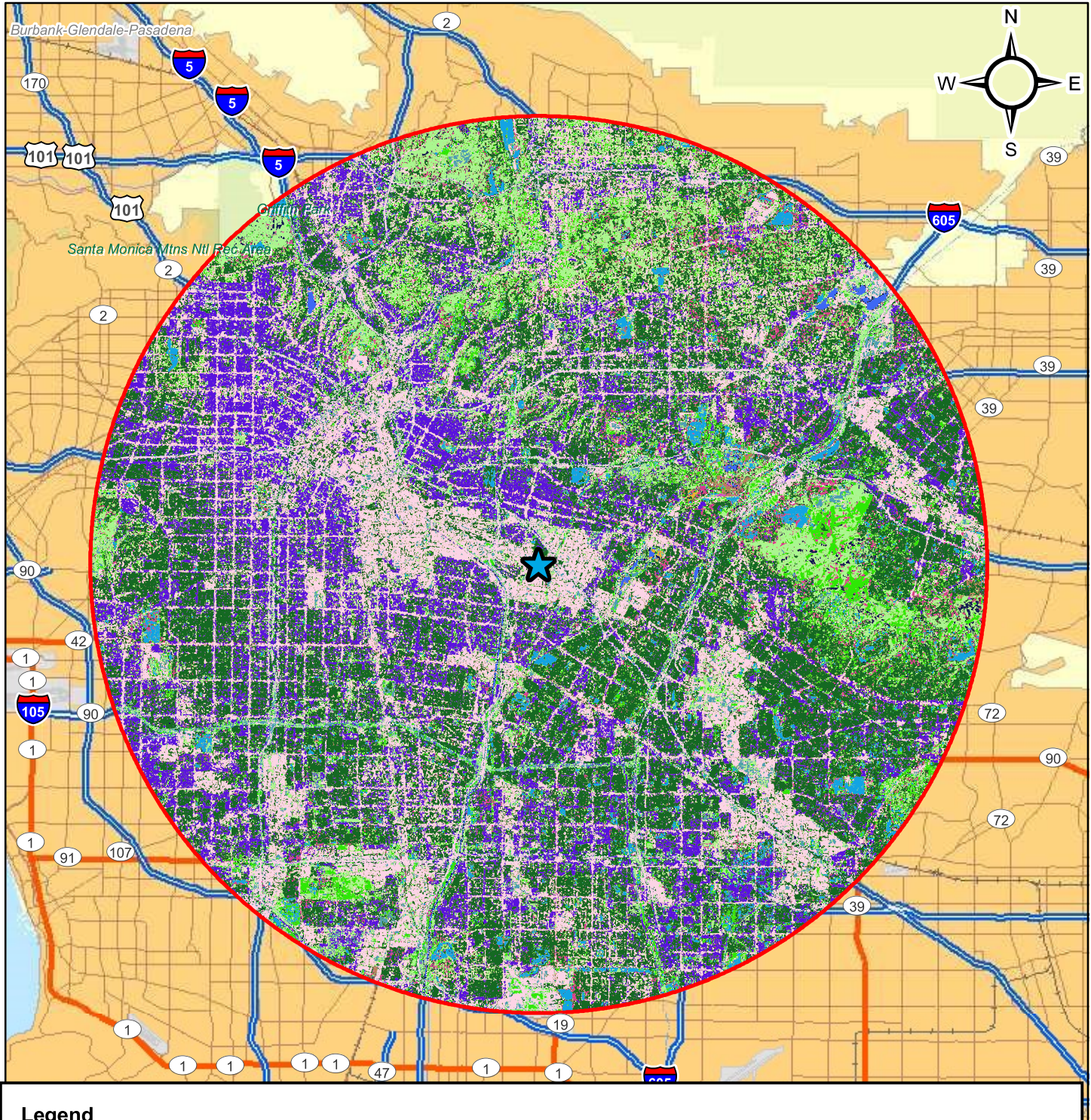
Notes:

1. Locations of sensitive receptors were obtained from the following databases:
 - a. California Department of Education, California School Directory (<http://www.cde.ca.gov/re/sd/>)
 - b. The Automated Licensing Information and Report Tracking System (Hospitals and Licensed Care Facilities) (<http://alirts.oshpd.ca.gov/AdvSearch.aspx>)
 - c. Yellow pages (<http://yp.yahoo.com>)
 - d. Community Care Licensing Division, State of California (http://www.cclcd.ca.gov/docs/ccld_search/ccld_search.aspx)

**Figure 2-1: General Facility Location
BNSF Commerce Eastern Rail Yard
Commerce, California**



Figure 2-2: Land Use Within Twenty Kilometers of Facility
BNSF Commerce Eastern Rail Yard
Commerce, California



Legend

NLCD Land Use Description

Bare Rock/Sand/Clay	Fallow	Orchards/Vineyards/Other	Transitional
Commercial/Industrial/Transportation	Grassland/Herbaceous	Pasture/Hay	Urban/Recreation Grasses
Deciduous Forest	High Intensity Residential	Quarries/Strip Mines/Gravel Pits	Woody Wetlands
Emergent Herbaceous Wetlands	Low Intensity Residential	Row Crops	
Evergreen Forest	Mixed Forest	Shrubland	
	Open Water	Small Grains	

ENVIRON

0 2.5 5 7.5 10
 Kilometers

Figure 2-3a: Stationary Locomotive Activities
BNSF Commerce Eastern Rail Yard
Commerce, California

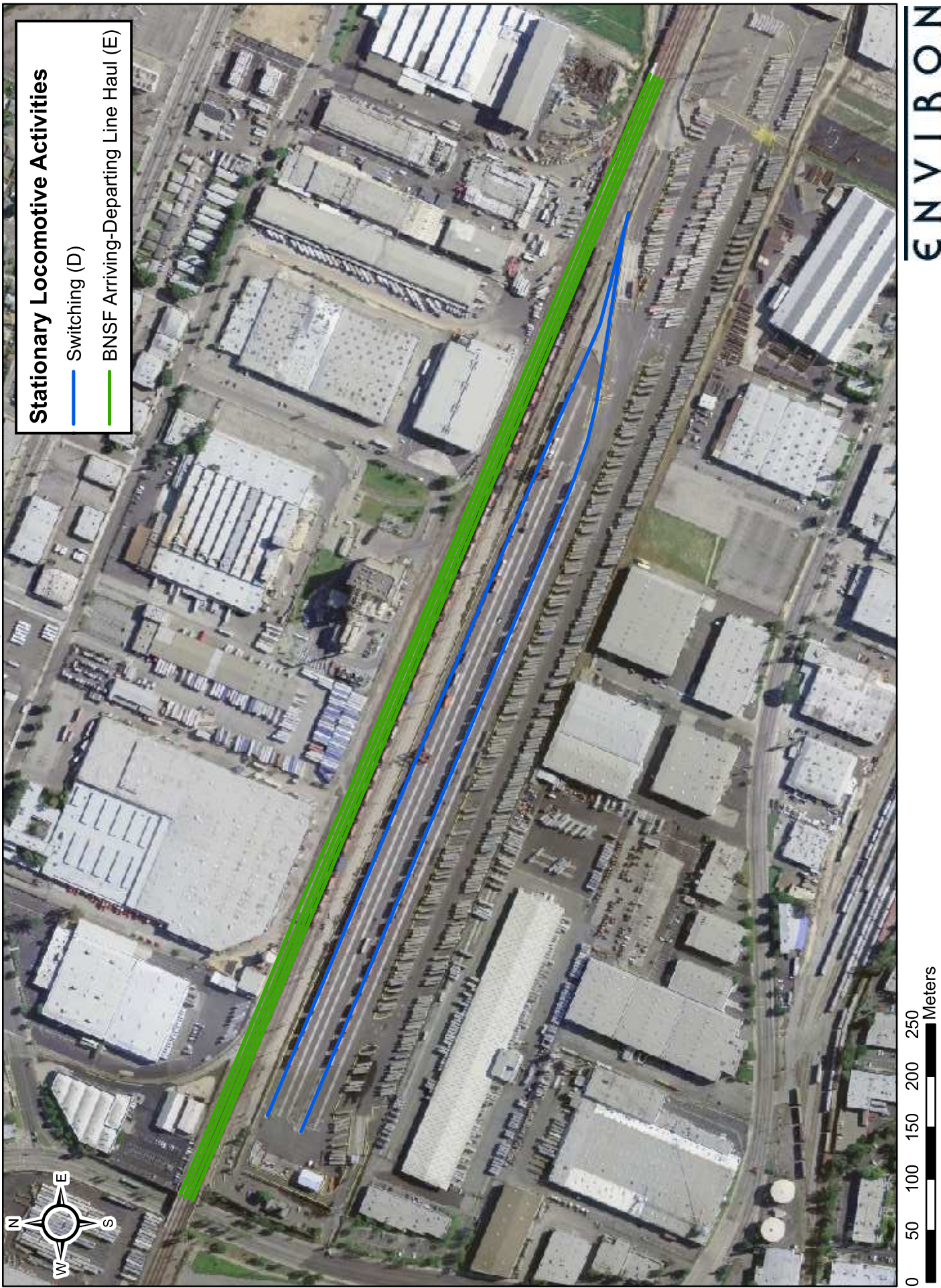


Figure 2-3: Locomotive Traffic Flow
BNSF Commerce Eastern Rail Yard
Commerce, California

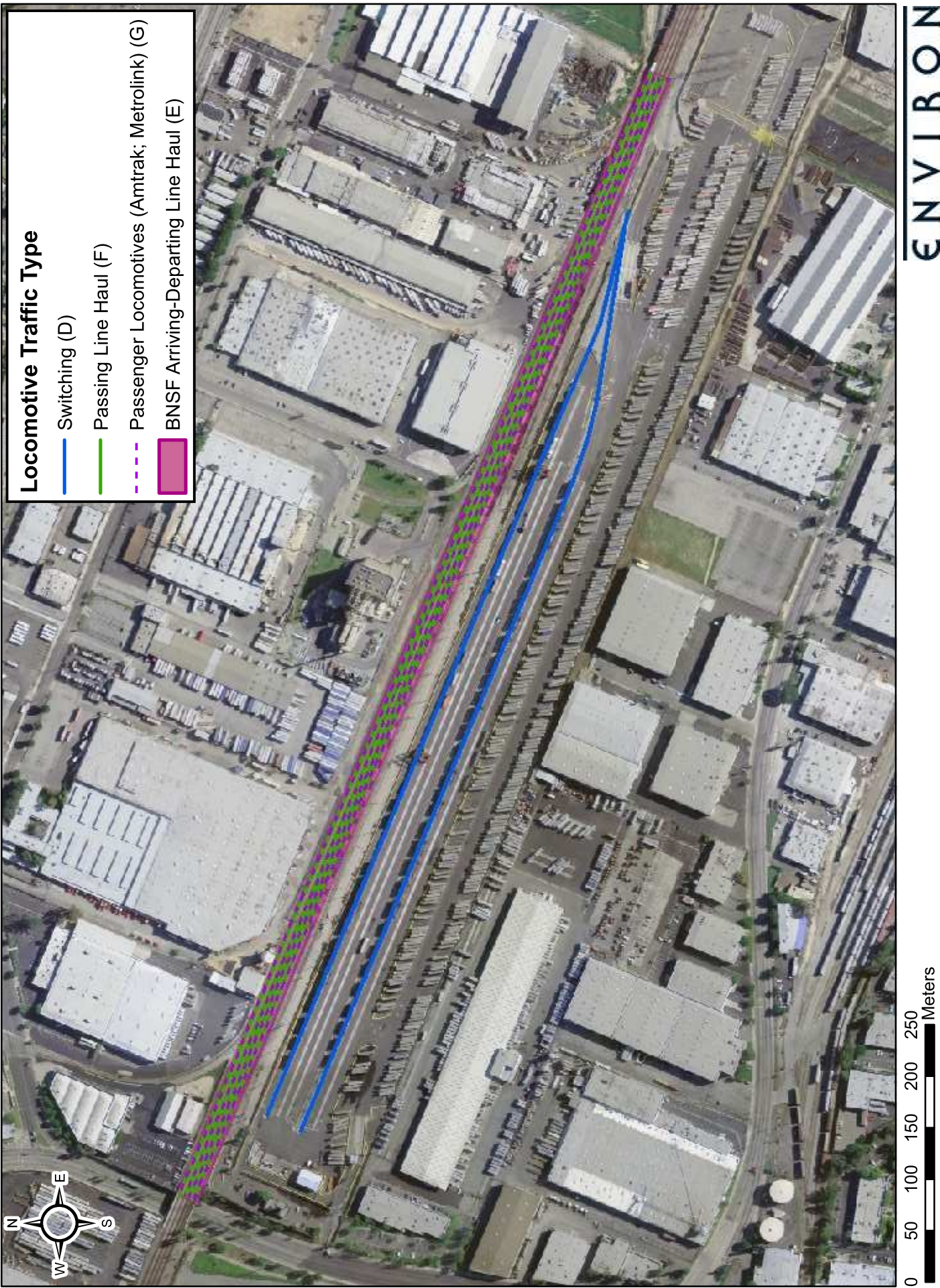


Figure 2-4: Cargo Handling, Maintenance, and Other Off-Road Equipment
BNSF Commerce Eastern Rail Yard
Commerce, California

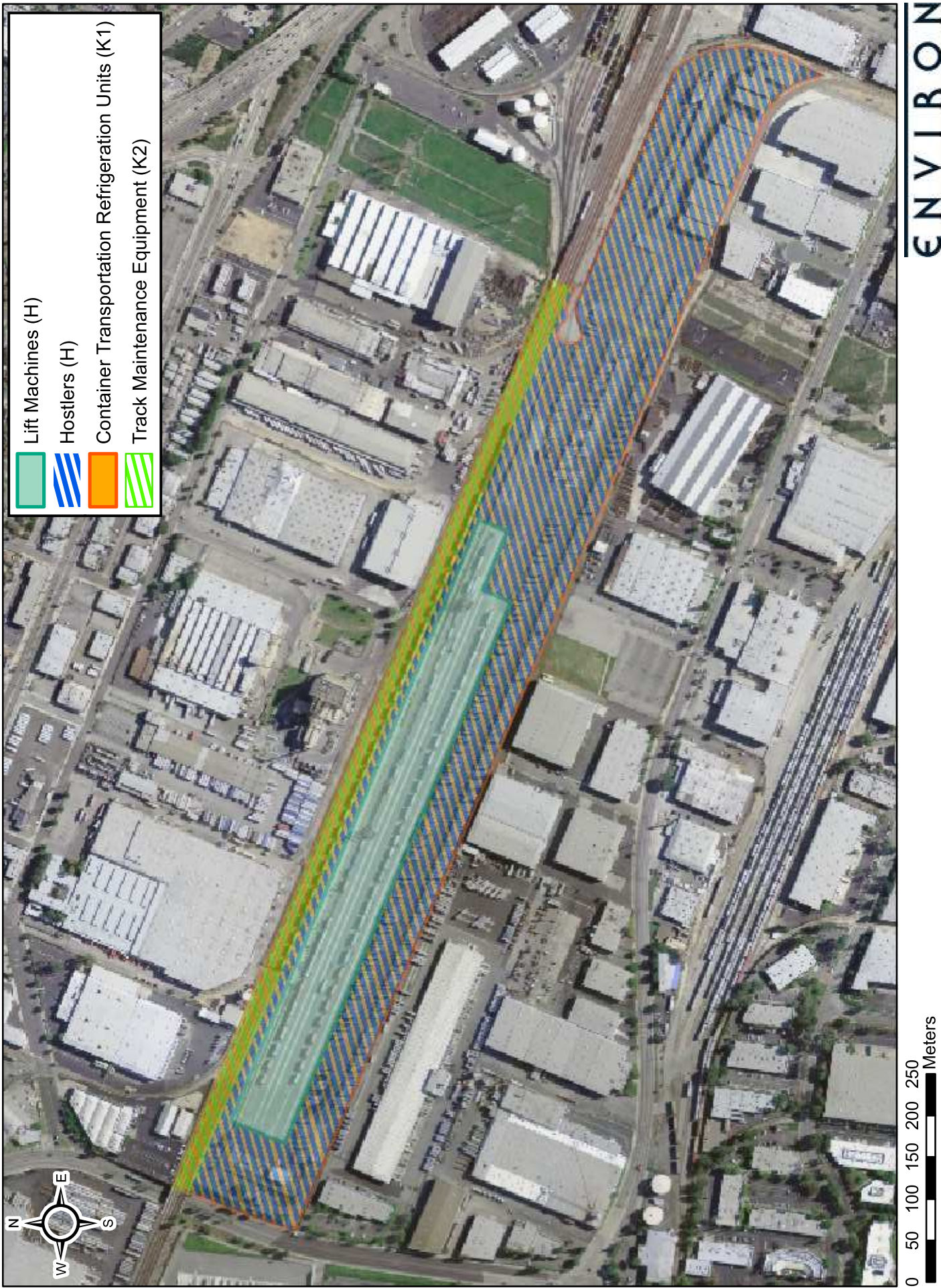


Figure 2-5: Vehicle Travel Routes and Destinations
BNSF Commerce Eastern Rail Yard
Commerce, California

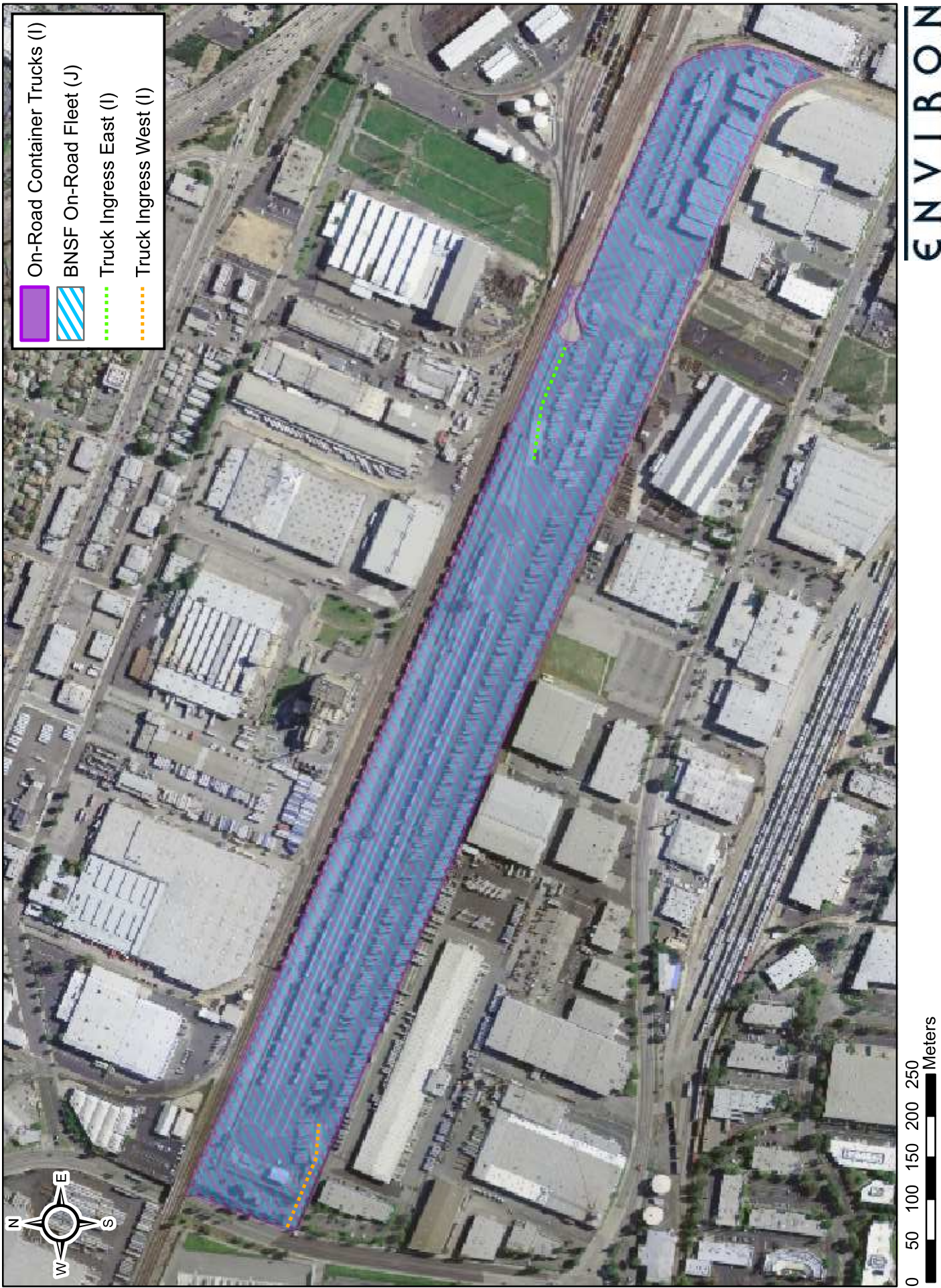


Figure 4-1: Locations of Modeled Stationary Locomotive Sources
BNSF Commerce Eastern Rail Yard
Commerce, California

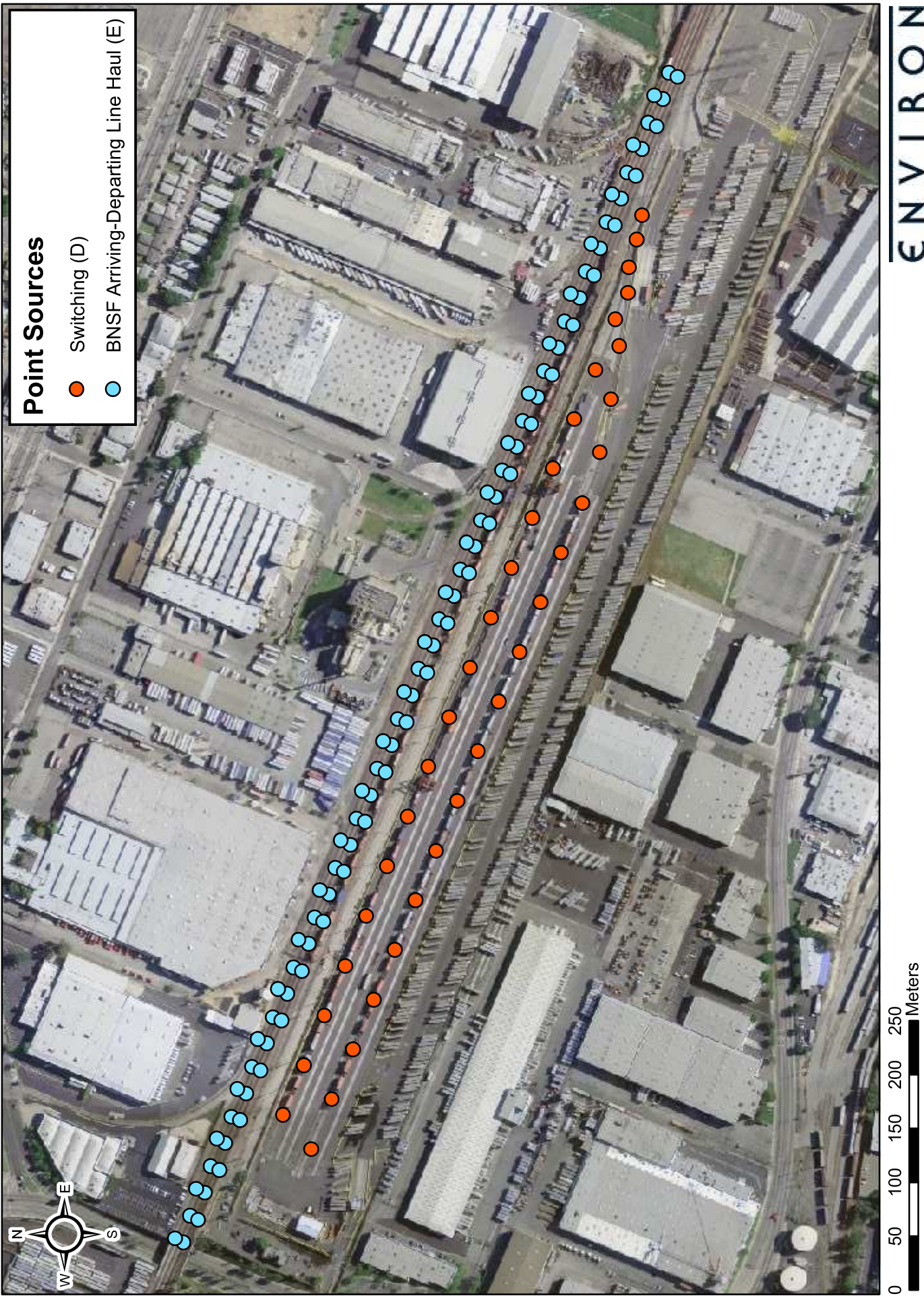


Figure 4-2: Locations of Modeled Movement Locomotive Sources
BNSF Commerce Eastern Rail Yard
Commerce, California

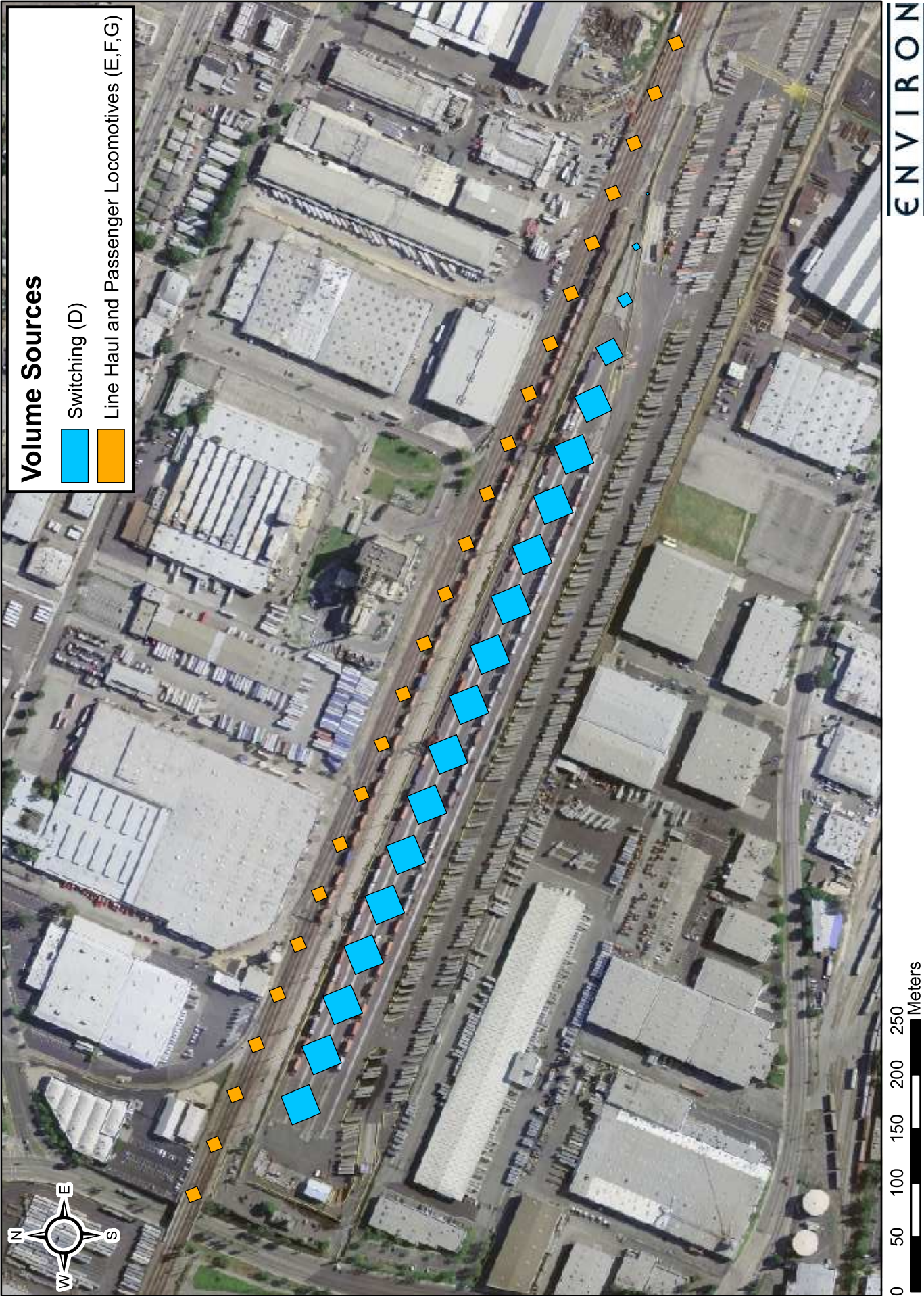


Figure 4-3: Locations of Modeled Cargo Handling and Off-Road Equipment Sources
BNSF Commerce Eastern Rail Yard
Commerce, California

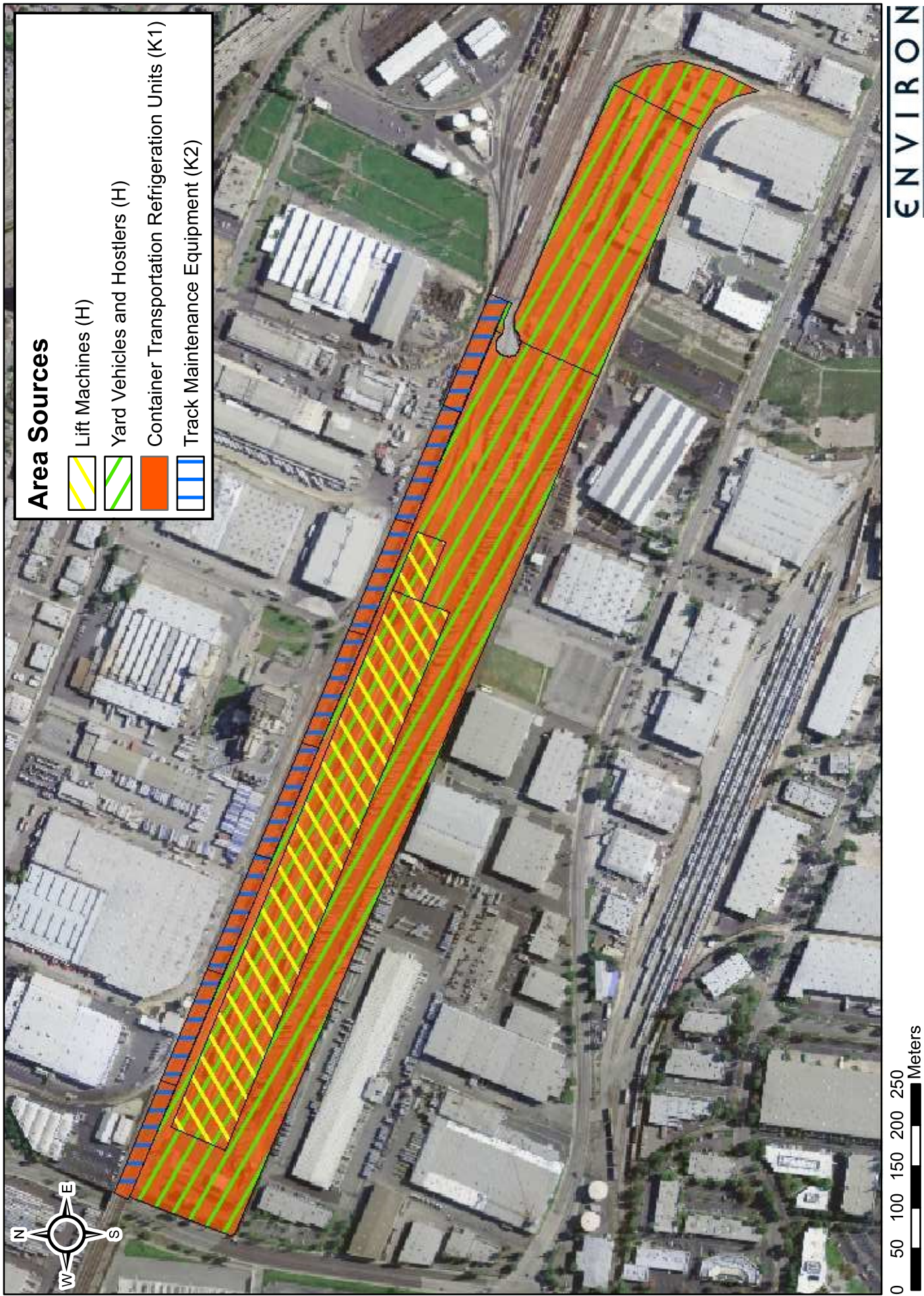
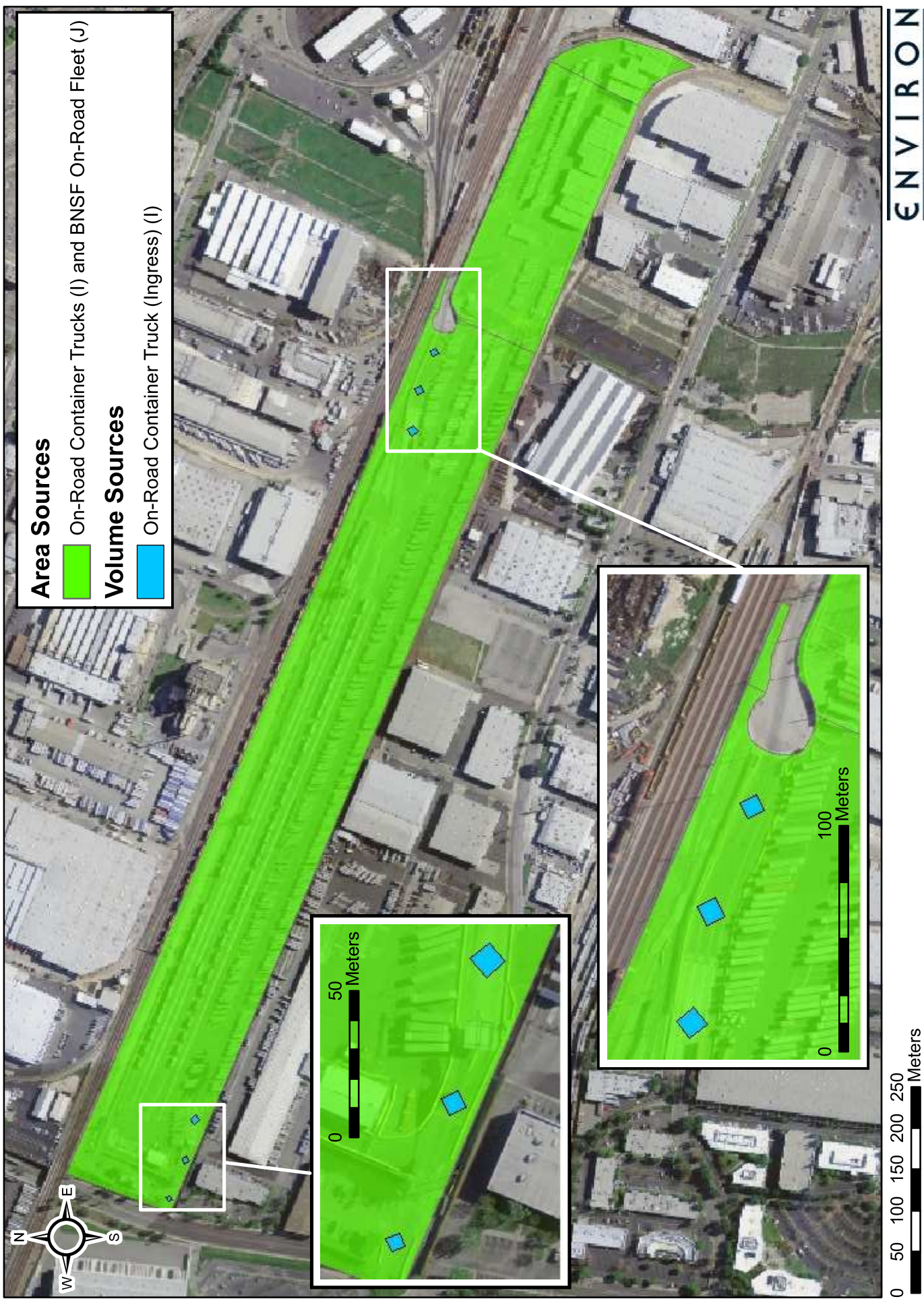


Figure 4-4: Locations of Modeled On-Road Container Truck and On-Road Fleet Sources
BNSF Commerce Eastern Rail Yard
Commerce, California



**Figure 4-5: Selection of Sectors for Surface Parameter Analysis
BNSF Commerce Eastern Rail Yard
Commerce, California**

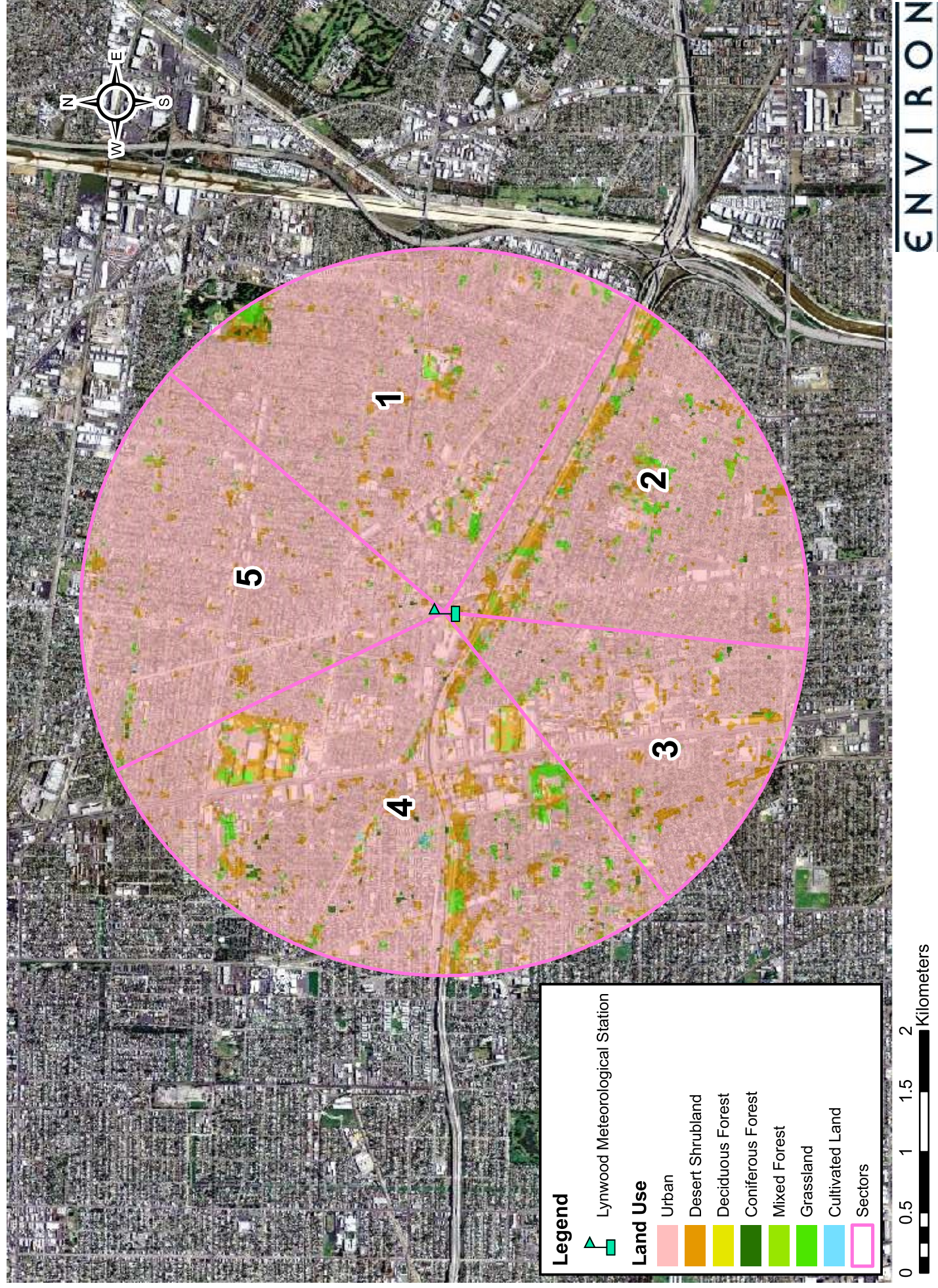


Figure 4-6: Locations of Buildings and Structures at the Facility
BNSF Commerce Eastern Rail Yard
Commerce, California

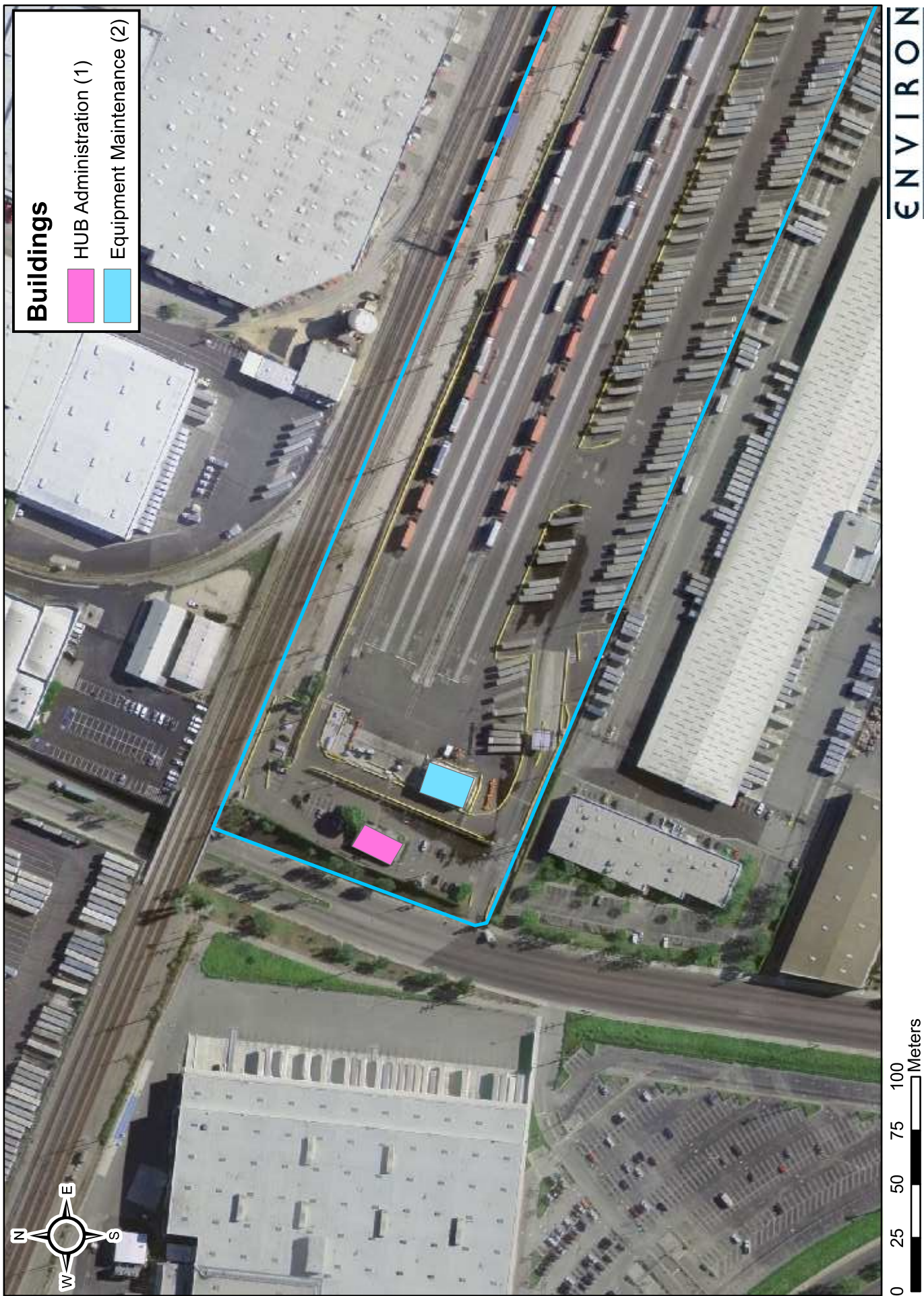


Figure 4-7: Land Use Within Three Kilometers of Facility
BNSF Commerce Eastern Rail Yard
Commerce, California

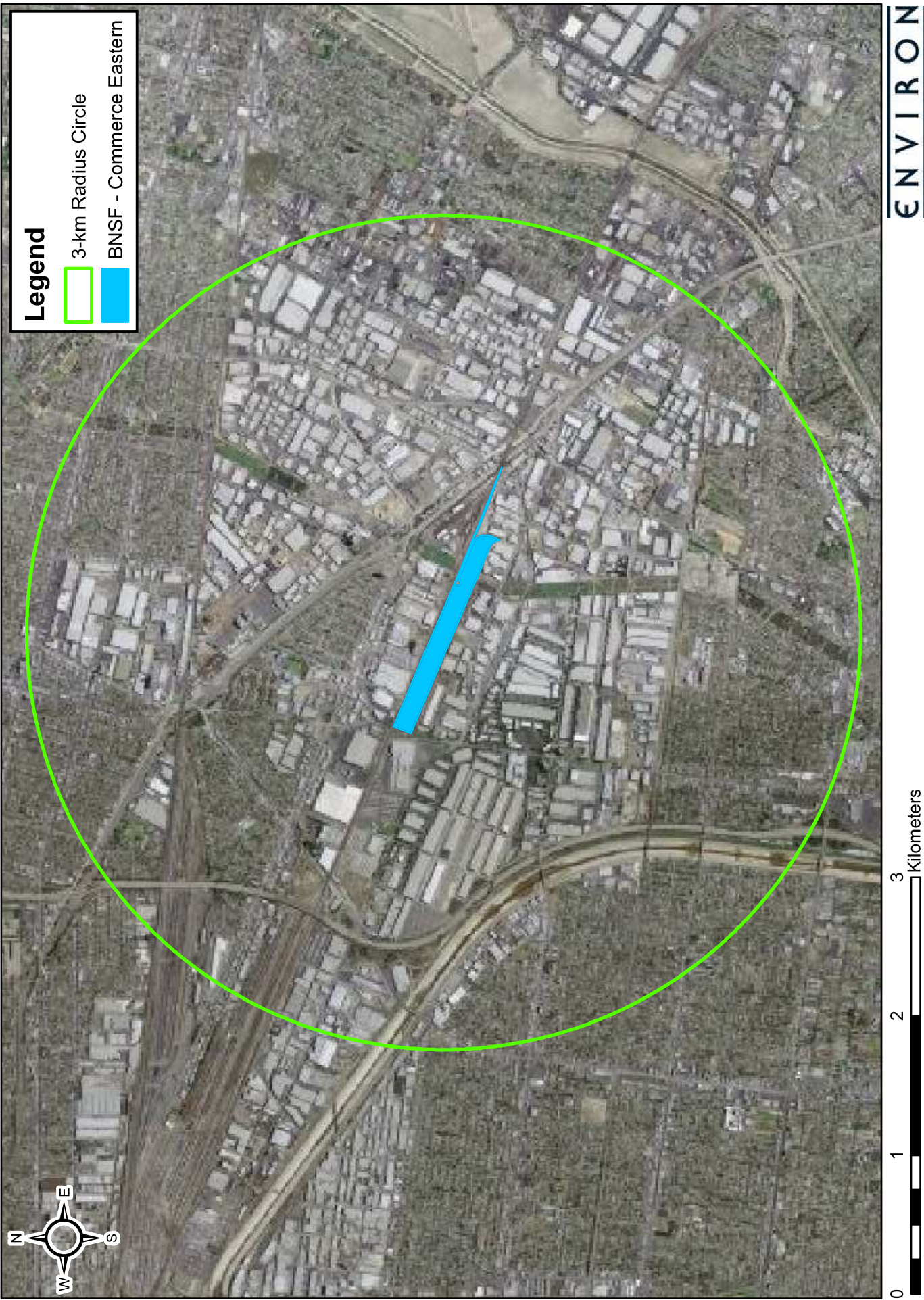
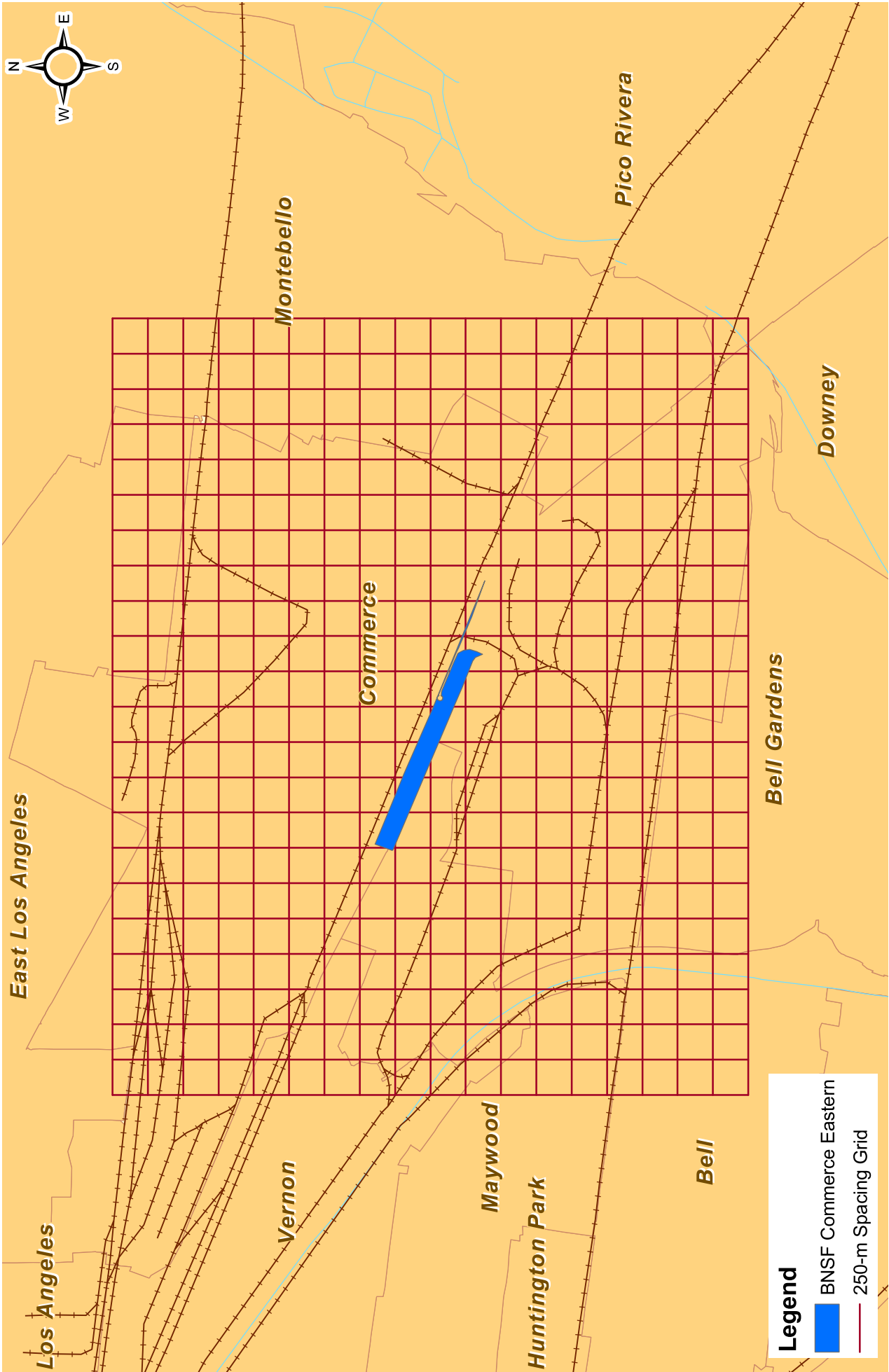


Figure 4-8b: Locations of Discrete Receptors in Medium Grid
BNSF Commerce Eastern Rail Yard
Commerce, California



**Figure 4-8c: Locations of Discrete Receptors in Fine Grid
BNSF Commerce Eastern Rail Yard
Commerce, California**

