RECON

An Employee-Owned Company

February 13, 2023

Ms Elizabeth Shearer-Nguyen- Program Manager
City of San Diego
Development Services
San Diego, CA

Reference: Response to Mitchell M. Tsai Letter Dated January 18, 2023

Dear Ms Nguyen::

RECON Environmental, Inc. on behalf of the City of San Diego (City) is providing responses to the letter received by the City dated January 18, 2023, delivered to the City Planner on the morning when the project had been on the Planning Commission's hearing calendar. As the public comment period for the project's Mitigated Negative Declaration (MND) had been closed after a 30-day public review period pursuant to California Environmental Quality Act (CEQA) § 15203, the City has no obligation to respond to such late filed comments submitted (see CEQA § 15207). Additionally, the January 18, 2023 letter is remarkably similar to the letter received on behalf of the Southwest Mountain States Regional Council of Carpenters received during the public review period, as responded to consistent with CEQA § 15208. Nonetheless, the following offers summary responses to the January 18, 2023, letter.

I. INTRODUCTION AND BACKGROUND INFORMATION

The comment provides background on Southwest Carpenters and their interest in the project. The City will provide notice on all CEQA actions, approvals, determinations, and hearings as requested. The comment does not raise a specific issue relating to the adequacy or accuracy of the draft MND.

II. THE CITY SHOULD REQUIRE THE USE OF A LOCAL WORKFORCE TO BENEFIT THE COMMUNITY'S ECONOMIC DEVELOPMENT AND ENVIRONMENT

The issues raised do not address the adequacy or accuracy of the draft MND. There is no CEQA provision nor any City code that mandates the City's requirement for the hiring or use of individual development project's construction labor. With specific respect to the City "utilizing local workforce policies and requirements to benefit the local area economically and to mitigate greenhouse gas, improve air quality, and reduce transportation impacts" it is noted that the comment does not present any substantial evidence of a project-specific greenhouse gas impact or transportation impact. The project would, at a minimum, be required to comply with the mandatory measures included in the current 2019 California Energy Code (California Code of Regulations, Title 24, Part 6) and the 2019 California Green Building Code standards. Regulatory compliance to this degree would require the project to include energy efficiency and green building standards such as solar, water efficient landscaping, construction material diversion, low-polluting construction finishing materials, and installation of electric charging stations. This is consistent with the City's General Plan Conservation Element and the City's Climate Action Plan (CAP) as detailed in the project's CAP Checklist. As specifically discussed in the draft MND, the project's compliance with all mandatory measures would ensure impacts related to energy use would be less than significant. As further discussed in the draft MND, the CAP Consistency Checklist demonstrates that the project would be consistent with applicable strategies and actions for reducing greenhouse gas emissions. This includes project features consistent with the energy and water efficient buildings strategy, as well as bicycling, walking, transit, and land use strategy. This issue was raised during the comment review period and received a similar response.

III. THE CITY SHOULD IMPOSE TRAINING REQUIREMENTS FOR THE PROJECT'S CONSTRUCTION ACTIVITIES TO PREVENT COMMUNITY SPREAD OF COVID-19 AND OTHER INFECTIOUS DISEASES

Regarding COVID-19, an Environmental Impact Report is required to identify and focus on the significant effects of a proposed project on the environment. Environment is defined as the "physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, noise, [and] objects of historic or aesthetic significance." Cal. Pub. Res. Code § 21060.5; see also CEQA Guidelines § 15360. As such, effects that are subject to review under CEQA must be related to a change to the physical environment. CEQA Guidelines § 15358(b). This is further outlined in CEQA Guidelines § 15126.2, which states that in assessing impacts of a project on the environment, the lead agency is required to "limit its examination to changes in the existing physical conditions." Regardless, COVID-19 is not a physical condition as defined in Cal. Pub. Res. Code § 21060.5 and is outside the purview of CEQA. Further, no public health risk impacts were identified (refer to Section iii(c) of the draft MND) and therefore mitigation is not required. In compliance with all public health mandates, the project would be required to adhere to all relevant state and local protocol and safety practices in place at the time of commencement of construction throughout the construction process.

IV. THE PROJECT WOULD BE APPROVED IN VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The issues raised do not address the adequacy or accuracy of the draft MND, but rather provide general guidance on CEQA; however, the draft MND thoroughly analyzed and disclosed the potentially significant project impacts consistent with CEQA's information disclosure mandates.

V. THE PROJECT WOULD BE APPROVED IN VIOLATION OF CEQA AS THE MND IS DEFICIENT

This section raises issues related to reliance on regulations to reduce potentially significant impacts and alleges the project's diesel particulate matter (DPM) impacts would be significant. The reliance on regulations to ensure potentially significant impacts are avoided or reduced to less than significant levels is an appropriate tool when evaluating project impacts for CEQA purposes. The City is required to enforce federal, state, and local regulations on all projects within its jurisdiction, both discretionary and ministerial. The application of specific regulations as a means to reduce potential impacts would therefore be specific and feasible actions that have been enacted through an administrative process to improve adverse environmental conditions. It is understood that if significant impacts would remain, notwithstanding adherence to regulations, additional mitigation measures would be required; however, in the Bella Mar project analysis, regulatory compliance, as detailed throughout the MND, would be adequate to support a finding of less than significant.

Regarding purported DPM impacts, the commenter appears to be addressing construction DPM exposure/impacts, but the commenter provides no substantial evidence of such impacts. The MND concluded that "Due to the limited duration of construction activities[,] the average distance to the nearest sensitive receptor, and implementation of the In-Use Off-Road Diesel-Fueled Fleets Regulation, DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Therefore, project construction would not expose sensitive receptors to substantial pollutant concentration[s]." The MND determination is not solely based upon regulatory compliance. As to operational DPM exposure/impacts, the MND provides an expert health risk assessment (supported by an expert technical report), that determined that the project would have a less than significant impact with respect to exposing sensitive receptors to substantial pollutant concentrations. See Attachment 1, Bella Mar Apartments Project Construction Health Risk Assessment, which provides further evidence that the project construction-related sources of DPM would be minimal and based on California Emissions Estimator Model

calculations for project construction, the project would not expose sensitive receptors to substantial pollutant concentrations associated with DPM during construction that could result in excess cancer risks, and impacts would be less than significant.

VI. THE MND FAILS TO ADEQUATELY EVALUATE AND MITIGATE THE PROJECT'S ENVIRONMENTAL IMPACTS BECAUSE THE MND COMPRESSES THE ANALYSIS OF IMPACTS AND MITIGATION MEASURES INTO A SINGLE ISSUE

The issue raised claims the draft MND compressed the analysis of impacts and mitigation in violation of *Lotus v. Department of Transportation*, (2014) 223 Cal. App. 4th 645, specifically referring to potential DPM exposure and implementation of regulatory compliance measures. (Again, it is assumed the commenter is referring to construction DPM exposure/impacts, not operational DPM exposure.) In *Lotus*, the Environmental Impact Report did not contain any impact analysis regarding potential impacts to tree root zones from project construction or make any impact determination; however, the project was conditioned to follow special construction techniques (i.e., mitigation measures) that would avoid significant impacts to tree root zones. Thus, mitigation was adopted absent impact analysis and a significant impact determination. The court held that the adoption of mitigation did not alleviate the need to have conducted the impact analysis in the first place. As set forth above, the MND contains adequate DPM impact analysis and determines, based on a number of factors, including regulatory compliance, that there will be a less than significant impact as to toxic air contaminant exposure (including DPM). Nothing more was required. The MND did not violate *Lotus*.

In light of the above, the January 18, 2023 letter does not provide any new substantial evidence that would require revisions to or recirculation of the draft MND.

Sincerely,

Lori Spar

Lori Spar
Senior Project Manager

ATTACHMENT 1

Bella Mar Apartments Project Construction
Health Risk Assessment

RECON

An Employee-Owned Company

February 13, 2023

Ms. Elizabeth Shearer-Nguyen
Senior Planner
City of San Diego
1222 First Avenue, Fifth Floor
San Diego, CA 92101

Reference: Bella Mar Apartments Project Construction Health Risk Assessment (RECON Number 8575)

Dear Ms. Shearer-Nguyen:

Construction of the Bella Mar Apartments Project (project) would result in short-term diesel exhaust emissions from on-site heavy-duty equipment. Other construction-related sources of diesel particulate matter (DPM) include material delivery trucks and construction worker vehicles; however, these sources are minimal relative to construction equipment. Not all construction worker vehicles would be diesel-fueled and most DPM emissions associated with material delivery trucks and construction worker vehicles would occur off-site.

For purposes of analyzing construction-related toxic air contaminant emissions and their impact on sensitive receptors, the maximum annual particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) emissions from equipment exhaust were used to develop an average daily emission rate. This is conservative since not all exhaust PM_{10} contains DPM. The exhaust emissions were calculated by the California Emissions Estimator Model (CalEEMod), and the maximum annual DPM concentration was calculated using AERSCREEN. AERSCREEN calculates a worst-case maximum 1-hour concentration at a specific distance and specific angle from the source. The maximum 1-hour concentration is then converted to an annual concentration using a 0.08 conversion factor (U.S. Environmental Protection Agency 1992).

Once the dispersed concentrations of diesel particulates are estimated in the surrounding air, they are used to evaluate estimated exposure to people. Exposure is evaluated by calculating the dose in milligrams per kilogram body weight per day (mg/kg/d). For residential exposure, the breathing rates are determined for specific age groups, so inhalation dose (Dose-air) is calculated for each of these age groups: third trimester of pregnancy, 0<2, 2<9, 2<16, 16<30 and 16–70 years. The equation for dose through inhalation (Dose-air) is as follows:

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

Where:

Dose-air	=	Chronic daily intake, mg/kg/d
C_{air}	=	Ground-level concentration of toxic air contaminants to which the receptor is exposed, micrograms/cubic meter
DBR	=	Daily breathing rate, normalized to body weight (liters per kilogram body weight per day (Office of Environmental Health Hazard Assessment [OEHHA] 2015)
A	=	Inhalation absorption factor (OEHHA recommended factor of 1)
EF	=	Exposure frequency, days/year (OEHHA recommended factor of 0.96 for resident and 0.68 for workers)

Cancer risk is calculated by multiplying the daily inhalation or oral dose, by a cancer potency factor, the age sensitivity factor, the frequency of time spent at home and the exposure duration divided by averaging time, to yield the excess

cancer risk. The excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk for any given location. The worst-case cancer risk is calculated as follows:

Excess Cancer Risk = Dose-air × CPF × ASF × ED/AT × FAH;
Where:

Dose-air	=	Chronic daily intake, mg/kg body weight per day
CPF	=	Cancer potency factor (mg/kg/d)
ASF	=	Age sensitivity factor
ED	=	Exposure duration (years)
AT	=	Averaging time for lifetime cancer risk (years)
FAH	=	Fraction of time at home

Non-cancer risks are defined as chronic or acute. With respect to DPM only chronic risks are calculated and are determined by the hazard index. To calculate hazard index, DPM concentration is divided by its chronic Reference Exposure Levels. Where the total equals or exceeds one, a health hazard is presumed to exist.

In this analysis, non-carcinogenic impacts are evaluated for chronic exposure inhalation exposure. Estimates of health impacts from non-carcinogenic concentrations are expressed as a hazard quotient (HQ) for individual substances, such as diesel particulate. An HQ of one or less indicates that adverse health effects are not expected to result from exposure to emissions of that substance. Reference Exposure Levels are defined as the concentration at which no adverse health effects are anticipated. Generally, the inhalation pathway is the largest contributor to the total dose. The HQ is calculated with the flowing equation:

HQ = Ground-Level Concentration ($\mu g/m^3$)/Reference Exposure Level ($\mu g/m^3$)

It should also be noted that all construction equipment is subject to the California Air Resources Board In-Use Off-Road Diesel-Fueled Fleets Regulation. This regulation, which applies to all off-road diesel vehicles 25 horsepower or greater, limits unnecessary idling to five minutes, requires all construction fleets to be labeled and reported to the California Air Resources Board, bans Tier 0 equipment and phases out Tier 1 and 2 equipment (thereby replacing fleets with cleaner equipment), and requires that fleets comply with Best Available Control Technology requirements.

Based on the CalEEMod calculations for project construction, the project would result in on-site maximum annual emissions of 0.1527 ton of PM_{10} exhaust. This maximum annual emissions rate was modeled over the entire 17-month construction period, and therefore is a conservative assessment. Based on AERSCREEN modeling results, the maximum 1-hour ground-level DPM concentration from construction activities would be 0.0479 micrograms per cubic meter ($\mu g/m^3$). This was converted to an annual average concentration of 0.00383 $\mu g/m^3$ using a conversion factor of 0.08 (U.S. Environmental Protection Agency 1992). The resulting annual concentration was used in the equations discussed above. Using this methodology, it was calculated that the excess cancer risk would be 0.96 in a million. AERSCREEN output and cancer risk calculations are provided in Appendix A. DPM generated by project construction is not expected to create conditions where the probability is greater than 10 in 1 million of contracting cancer. Additionally, the HQ would be 0.0008, which is less than one. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations associated with diesel particulate matter during construction that could result in excess cancer risks, and impacts would be less than significant.

Sincerely,

Jessica Fleming
Senior Air Quality Specialist

References Cited

Office of Environmental Health Hazard Assessment (OEHHA)
2015 Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments (Guidance Manual), February.

U.S. Environmental Protection Agency (U.S. EPA)
1992 Screening Procedures for Estimating the Air Quality Impact of Stationary Sources.

APPENDIX A

8575 Bella Mar
Construction DPM HRA

Construction Health Risk Calculations

Annual PM Exhaust Generation

Annual Tons/Year	Pounds/year	lbs/day	lbs/hr	g/day	sec/day	g/sec
0.1527	305.4	8.37E-01	3.49E-02	380	86,400	4.39E-03

Max 1-hour concentration	4.79E-02	µg/m^3
Annualized average concentration (0.08)	3.83E-03	µg/m^3

Onsite Maximum Exposure	**3rd Trimester**	**0<2**	**2<9**	**2<16**	**16<30**	**16-70**
Cair	3.83E-03	3.83E-03	3.83E-03	3.83E-03	3.83E-03	3.83E-03
DBR	361	1090	861	745	335	290
A	1	1	1	1	1	1
EF	0.96	0.96	0.96	0.96	0.96	0.96
Dose-air	1.33E-06	4.01E-06	3.17E-06	2.74E-06	1.23E-06	1.07E-06
CPF	1.10	1.10	1.10	1.10	1.10	1.10
ASF	10	10	3	3	1	1
ED (years of construction = 1.417)	0.25	1.417	1.417	1.417	1.417	1.417
AT	70	70	70	70	70	70
FAH	0.85	0.85	0.72	0.72	0.73	0.73
Risk in 1 mill	**0.04**	**0.76**	**0.15**	**0.13**	**0.02**	**0.02**
	5.00	5.00	5.00	5.00	5.00	5.00
Chronic Exposure	**0.0008**	**0.0008**	**0.0008**	**0.0008**	**0.0008**	**0.0008**

0-9	0.96	3.08
0-30	0.96	4.50
0-70	0.95	4.50

AERSCREEN 11126 / AERMOD 1206 01/31/23
13:53:58

TITLE: Bella Mar

********** VOLUME PARAMETERS **********

SOURCE EMISSION RATE: 0.439E-02 g/s 0.348E-01 lb/hr
VOLUME HEIGHT: 5.00 meters 16.40 feet
INITIAL LATERAL DIMENSION: 300.00 meters 984.25 feet
INITIAL VERTICAL DIMENSION: 175.00 meters 574.15 feet
RURAL OR URBAN: URBAN
POPULATION: 20000

FLAGPOLE RECEPTOR HEIGHT: 1.50 meters 4.92 feet

INITIAL PROBE DISTANCE = 5000. meters 16404. feet

********** BUILDING DOWNWASH PARAMETERS **********

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

********** PROBE ANALYSIS **********
25 meter receptor spacing: 646. meters - 5000. meters

Zo SECTOR	ROUGHNESS LENGTH	1-HR CONC (ug/m3)	DIST (m)	TEMPORAL PERIOD
1*	1.000	0.4791E-01	646.0	WIN

* = worst case flow sector

********** MAKEMET METEOROLOGY PARAMETERS **********

MIN/MAX TEMPERATURE: 250.0 / 310.0 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Urban
DOMINANT CLIMATE TYPE: Average Moisture
DOMINANT SEASON: Winter

ALBEDO: 0.35
BOWEN RATIO: 1.50
ROUGHNESS LENGTH: 1.000 (meters)

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR	MO	DY	JDY	HR
10	01	16	16	01

H0	U*	W*	DT/DZ	ZICNV	ZIMCH	M-O LEN	Z0	BOWEN	ALBEDO	REF WS

```
-0.41  0.043 -9.000  0.020 -999.   21.     19.3 1.000   1.50   0.35    0.50

   HT  REF TA     HT
- - - - - - - - - - -
 10.0   310.0    2.0


     METEOROLOGY CONDITIONS USED TO PREDICT AMBIENT BOUNDARY IMPACT
     --------------------------------------------------------------

 YR MO DY JDY HR
 -- -- -- --- --
 10 01 16  16 01

   H0     U*     W*  DT/DZ ZICNV ZIMCH  M-O LEN    Z0  BOWEN ALBEDO  REF WS
 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -
-0.41  0.043 -9.000  0.020 -999.   21.     19.3 1.000   1.50   0.35    0.50

   HT  REF TA     HT
- - - - - - - - - - -
 10.0   310.0    2.0
```

********** AERSCREEN AUTOMATED DISTANCES **********

OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
646.00	0.4791E-01	2825.00	0.2873E-01
650.00	0.4777E-01	2850.00	0.2862E-01
675.00	0.4692E-01	2875.00	0.2852E-01
700.00	0.4613E-01	2900.00	0.2841E-01
725.00	0.4539E-01	2925.00	0.2830E-01
750.00	0.4469E-01	2950.00	0.2820E-01
775.00	0.4403E-01	2975.00	0.2809E-01
800.00	0.4340E-01	3000.00	0.2799E-01
825.00	0.4281E-01	3025.00	0.2789E-01
850.00	0.4225E-01	3050.00	0.2778E-01
875.00	0.4171E-01	3075.00	0.2768E-01
900.00	0.4120E-01	3100.00	0.2758E-01
925.00	0.4071E-01	3125.00	0.2748E-01
950.00	0.4024E-01	3150.00	0.2738E-01
975.00	0.3979E-01	3175.00	0.2728E-01
1000.00	0.3939E-01	3200.00	0.2718E-01
1025.00	0.3919E-01	3225.00	0.2708E-01
1050.00	0.3899E-01	3250.00	0.2699E-01
1075.00	0.3879E-01	3275.00	0.2689E-01
1100.00	0.3860E-01	3300.00	0.2680E-01
1125.00	0.3841E-01	3325.00	0.2670E-01
1150.00	0.3822E-01	3350.00	0.2661E-01
1175.00	0.3804E-01	3375.00	0.2651E-01
1200.00	0.3785E-01	3400.00	0.2642E-01
1225.00	0.3767E-01	3425.00	0.2633E-01
1250.00	0.3749E-01	3450.00	0.2623E-01
1275.00	0.3732E-01	3475.00	0.2614E-01
1300.00	0.3714E-01	3500.00	0.2605E-01
1325.00	0.3697E-01	3525.00	0.2596E-01
1350.00	0.3679E-01	3550.00	0.2587E-01
1375.00	0.3662E-01	3575.00	0.2578E-01
1400.00	0.3645E-01	3600.00	0.2569E-01
1425.00	0.3628E-01	3625.00	0.2561E-01
1450.00	0.3612E-01	3650.00	0.2552E-01
1475.00	0.3595E-01	3675.00	0.2543E-01
1500.00	0.3579E-01	3700.00	0.2535E-01
1525.00	0.3563E-01	3725.00	0.2526E-01
1550.00	0.3547E-01	3750.00	0.2517E-01
1575.00	0.3531E-01	3775.00	0.2509E-01

1600.00	0.3515E-01	3800.00	0.2501E-01
1625.00	0.3499E-01	3825.00	0.2492E-01
1650.00	0.3484E-01	3850.00	0.2484E-01
1675.00	0.3468E-01	3875.00	0.2476E-01
1700.00	0.3453E-01	3900.00	0.2467E-01
1725.00	0.3438E-01	3925.00	0.2459E-01
1750.00	0.3423E-01	3950.00	0.2451E-01
1775.00	0.3408E-01	3975.00	0.2443E-01
1800.00	0.3393E-01	4000.00	0.2435E-01
1825.00	0.3378E-01	4025.00	0.2427E-01
1850.00	0.3364E-01	4050.00	0.2419E-01
1875.00	0.3349E-01	4075.00	0.2412E-01
1900.00	0.3335E-01	4100.00	0.2404E-01
1925.00	0.3321E-01	4125.00	0.2396E-01
1950.00	0.3307E-01	4150.00	0.2388E-01
1975.00	0.3293E-01	4175.00	0.2381E-01
2000.00	0.3279E-01	4200.00	0.2373E-01
2025.00	0.3265E-01	4225.00	0.2365E-01
2050.00	0.3251E-01	4250.00	0.2358E-01
2075.00	0.3238E-01	4275.00	0.2350E-01
2100.00	0.3224E-01	4300.00	0.2343E-01
2125.00	0.3211E-01	4325.00	0.2336E-01
2150.00	0.3197E-01	4350.00	0.2328E-01
2175.00	0.3184E-01	4375.00	0.2321E-01
2200.00	0.3171E-01	4400.00	0.2314E-01
2225.00	0.3158E-01	4425.00	0.2307E-01
2250.00	0.3145E-01	4450.00	0.2299E-01
2275.00	0.3132E-01	4475.00	0.2292E-01
2300.00	0.3120E-01	4500.00	0.2285E-01
2325.00	0.3107E-01	4525.00	0.2278E-01
2350.00	0.3095E-01	4550.00	0.2271E-01
2375.00	0.3082E-01	4575.00	0.2264E-01
2400.00	0.3070E-01	4600.00	0.2257E-01
2425.00	0.3058E-01	4625.00	0.2251E-01
2450.00	0.3045E-01	4650.00	0.2244E-01
2475.00	0.3033E-01	4675.00	0.2237E-01
2500.00	0.3021E-01	4700.00	0.2230E-01
2525.00	0.3010E-01	4725.00	0.2223E-01
2550.00	0.2998E-01	4750.00	0.2217E-01
2575.00	0.2986E-01	4775.00	0.2210E-01
2600.00	0.2974E-01	4800.00	0.2204E-01
2625.00	0.2963E-01	4825.00	0.2197E-01
2650.00	0.2951E-01	4850.00	0.2190E-01
2675.00	0.2940E-01	4875.00	0.2184E-01
2700.00	0.2929E-01	4900.00	0.2178E-01
2725.00	0.2917E-01	4925.00	0.2171E-01
2750.00	0.2906E-01	4950.00	0.2165E-01
2775.00	0.2895E-01	4975.00	0.2158E-01
2800.00	0.2884E-01	5000.00	0.2152E-01

********** AERSCREEN MAXIMUM IMPACT SUMMARY **********

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	4.79E-02	4.79E-02	4.31E-02	2.88E-02	4.79E-03

DISTANCE FROM SOURCE 646.00 meters

IMPACT AT THE
AMBIENT BOUNDARY 0.4791E-01 0.4791E-01 0.4312E-01 0.2875E-01 0.4791E-02

DISTANCE FROM SOURCE 646.00 meters