



June 7, 2018

Mr. Rick Manners  
Lewis Land Developers, LLC  
1156 N. Mountain Ave.  
Upland, CA 92614

**SUBJECT: LEWIS RETAIL AND CIVIC CENTER (PLN17-20015) AND AL'S CORNER (PLN17-20029)  
HEALTH RISK ASSESSMENT**

Dear Mr. Rick Manners:

The firm of Urban Crossroads, Inc. is pleased to submit this Health Risk Assessment (HRA) to Lewis Land Developers, LLC (Client) for the Lewis Retail and Civic Center (PLN17-20015) and Al's Corner (PLN17-20029) ("Project").

The purpose of this analysis is to address comments provided by the South Coast Air Quality Management District (SCAQMD) on the *Draft Environmental Impact Report (DEIR) for the Proposed Lewis Retail and Civic Center (PLN17-20015) and Al's Corner (PLN17-20029)* (April 2018).

The SCAQMD provided a comment letter on May 15, 2018. In their comment letter, SCAQMD states that since the Project includes gasoline dispensing facilities, an HRA should be performed to address potential impacts to sensitive receptors from benzene, which is a toxic air contaminant that may be emitted during gasoline refueling operations. The comment recommends that an HRA be prepared consistent with the SCAQMD's *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations*<sup>1</sup>. As such, the analysis herein serves to address the SCAQMD's comment by preparing an HRA for the gasoline dispensing facilities identified in the DEIR.

## **HEALTH RISK ASSESSMENT**

Emissions resulting from gasoline service station operations may include toxic air contaminants (TACs) (e.g., benzene, hexane, MTBE, toluene, xylene) and have the potential to contribute to health risk in the Project vicinity. It should be noted that standard regulatory controls such as the SCAQMD's Rule 461 (Gasoline Transfer and Dispensing) would apply to the Project in addition to any permits required that demonstrate appropriate operational controls. Prior to issuance of a Permit to Operate, each individual gasoline dispensing station would be required to obtain the required permits from SCAQMD which

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<sup>1</sup> [http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/attachmentn\\_080717.pdf](http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/attachmentn_080717.pdf)

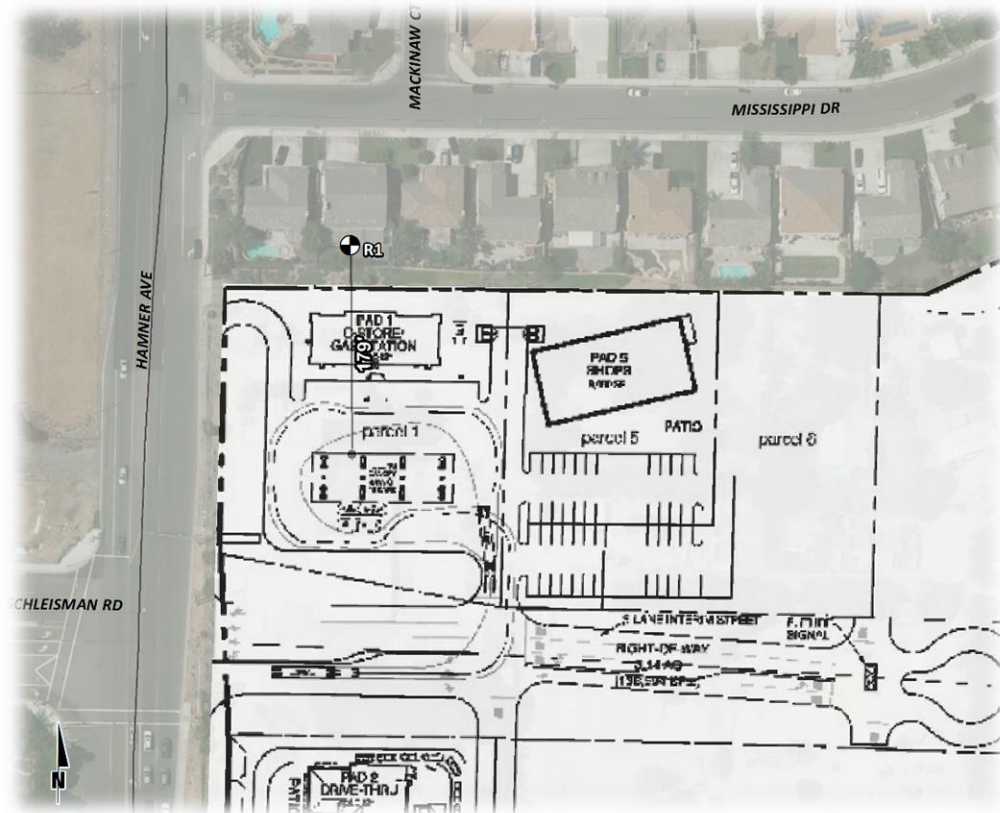
would identify the maximum annual throughput allowed based on specific fuel storage and dispensing equipment that is proposed by the operator.

The analysis presented here reflects a maximum annual throughput of approximately 4,000,000 gallons for Site 1 and 2,000,000 gallons for Site 2. This is preliminarily determined to be the approximate upper limit of gasoline throughput at which the respective fueling stations could operate while precluding potentially significant health risks. Ultimate fuel throughput allowances/requirements would be established by SCAQMD through the fueling station permitting processes noted above.

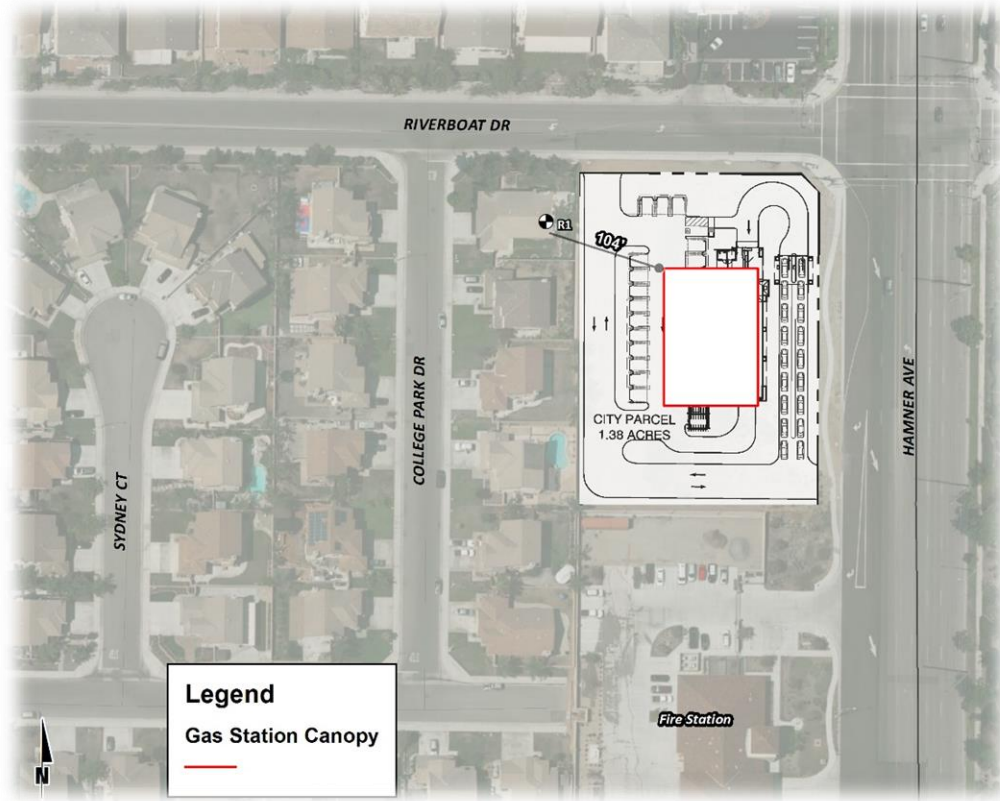
For purposes of this evaluation, cancer risk estimates have been made consistent with the methodology presented in SCAQMD's *Risk Assessment Procedures for Rules 1401, 1401.1 & 212* which provide screening-level risk estimates for gasoline dispensing operations. The Project site is located within Source Receptor Area (SRA) 23.

The nearest residences to the proposed gasoline station canopies are identified at Exhibit 1 and Exhibit 2 for Site 1 and Site 2, respectively. As shown, the nearest receptor to Site 1 is located approximately 179 feet to the north of the proposed gasoline canopy, and the nearest receptor to Site 2 is located approximately 104 feet to the west of the proposed gasoline canopy.

**EXHIBIT 1: SITE 1 GASOLINE CANOPY AND NEAREST RECEPTOR**



**EXHIBIT 2: SITE 2 GASOLINE CANOPY AND NEAREST RECEPTOR**



Based on the established SCAQMD procedure outlined in the *SCAQMD Permit Application Package "N"* it is estimated that the maximum risk attributable to the gasoline dispensing would be:

- 6.16 in one million for the nearest sensitive receptor to Site 1
- 6.96 in one million for the nearest sensitive receptor to Site 2

Attachment "A" includes excerpts from the *SCAQMD Permit Application Package "N"* which identifies the potential risk per one million gallons of gasoline dispensed at the defined downwind distances.

**CONCLUSIONS**

As shown, no sensitive receptors in the Project vicinity would be exposed to a cancer risk of greater than 10 in one million. The maximum risk estimate at any sensitive land use in the vicinity of the Project would be 6.96 in one million. The Project gas station operations would therefore not generate emissions that would cause or result in an exceedance of the applicable SCAQMD cancer threshold of 10 in one million. As such, the Project would not have a significant impact with respect to health risks from the gasoline dispensing stations. No significant impacts would occur; thus no mitigation is required.

Mr. Rick Manners  
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If you have any questions, please contact me directly at (949) 336-5987.

Respectfully submitted,

URBAN CROSSROADS, INC.

A handwritten signature in black ink, appearing to read 'AQ', is positioned above the name of the sender.

Haseeb Qureshi,  
Senior Associate

**ATTACHMENT "A"**

**Table 12.1A – Screening Tables for Gasoline Dispensing Facilities**

**Underground Storage Tank (UST)**

**Residential**

**MICR per One Million Gallons of Gasoline**

Station Abbr.	Location	Downwind Distance (meters)							
		25	50	75	100	200	300	500	1000
AZUS	Azusa	2.884	1.040	0.550	0.340	0.093	0.045	0.018	0.006
BNAP	Banning	4.208	1.703	0.940	0.603	0.186	0.093	0.039	0.013
CELA	Central L.A.	2.484	0.876	0.455	0.287	0.085	0.041	0.017	0.005
ELSI	Lake Elsinore	2.978	1.075	0.558	0.347	0.103	0.051	0.021	0.007
FONT	Fontana	3.306	1.254	0.677	0.423	0.124	0.060	0.025	0.007
MSVJ	Mission Viejo	2.721	0.981	0.515	0.319	0.094	0.047	0.018	0.006
PERI	Perris	3.494	1.310	0.695	0.436	0.127	0.063	0.026	0.008
PICO	Pico Rivera	2.629	0.956	0.509	0.316	0.091	0.044	0.018	0.005
RDLD	Redlands	3.562	1.325	0.691	0.418	0.113	0.055	0.024	0.007
UPLA	Upland	3.108	1.133	0.609	0.384	0.111	0.054	0.022	0.007
KBUR	Burbank Airport	3.097	1.198	0.655	0.410	0.125	0.062	0.026	0.008
KCNO	Chino Airport.	4.084	1.609	0.870	0.549	0.166	0.082	0.033	0.010
KCQT	USC/Downtown L.A.	3.382	1.244	0.656	0.407	0.110	0.052	0.021	0.007
KFUL	Fullerton Airport	2.726	1.027	0.553	0.348	0.104	0.052	0.021	0.007
KHHR	Hawthorne Airport	3.225	1.197	0.640	0.405	0.123	0.061	0.025	0.007
KLAX	Los Angeles Int'l Airport	4.456	1.830	1.010	0.648	0.204	0.102	0.044	0.013
KLGB	Long Beach Airport	3.417	1.394	0.764	0.488	0.151	0.076	0.033	0.010
KONT	Ontario Airport	4.834	2.006	1.111	0.710	0.222	0.112	0.047	0.015
KPSP	Palm Springs Airport	3.363	1.352	0.736	0.467	0.144	0.073	0.031	0.010
KRAL	Riverside Airport	4.141	1.678	0.922	0.588	0.177	0.088	0.038	0.013
KSMO	Santa Monica Airport	3.444	1.336	0.731	0.462	0.139	0.068	0.028	0.008
KSNA	John Wayne Int'l Airport	4.041	1.605	0.870	0.549	0.164	0.079	0.032	0.010
KTRM	Desert Hot Springs Airport	3.820	1.553	0.848	0.540	0.163	0.082	0.035	0.010
KVNY	Van Nuys Airport	2.909	1.132	0.608	0.378	0.111	0.055	0.022	0.007