

City and County of San Francisco

Department of Public Health



September 21, 1990

Commander, Western Division
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Attn: Louise T. Lew, Code 1811

The San Francisco Department of Public Health concurs with the Navy's general approach for the proposed revisions to the Air Modeling and Risk Assessment of Airborne Contaminants During Proposed Removal Actions at the Tank Farm and Pickling and Plate Yard. However, it appears that the quantity of material that will potentially be discharged into the air has been overestimated by many times.

There has been no rationale presented for using the density of any particular compound as representative of average residues. Table 2 in the risk assessment gives analytical results for three samples in which zinc concentrations ranged from 9.3% to 13% by weight and total chromium concentrations ranged from 3.8% to 5.3% by weight. These results do not support an assumption that the residues will have physical properties similar to those of zinc chromate.

A visit to the site indicated that the average thickness of the residues on the concrete drying is substantially less than the estimate of 1.5 inches that was used in the exposure assessment. (The concrete drying racks accounted for 88% of the total volume of residues calculated in the assessment.) In areas where residues were this thick, it appeared that the residues might be easily separable from the concrete base and had actually fallen off in a number of places.

In the event that the revised air model indicates concentrations of air contaminants that will exceed levels considered safe for nearby businesses and for which the Navy feels compelled to displace commercial tenants, it is requested that the Navy first consider refining the estimate of contaminant quantities emitted into the air. Since it appears that the value of the risk index for a particular isopleth has a simple relationship to the quantities of contaminants emitted, it should not be difficult to adjust the air modeling results based on adjustments to this parameter.

Sincerely,

A handwritten signature in cursive script that reads "William Lee".

William Lee, R.E.H.S., M.S., C.S.P., C.I.H.
Director, Toxics and Safety Services
San Francisco Department of Public Health

cc: Mark Malinowski
Chuck Flippo
Scott Lutz