



# BAY AREA AIR QUALITY MANAGEMENT DISTRICT

N00217.000957  
HUNTERS POINT  
SSIC NO. 5090.3

August 22, 1989

ALAMEDA COUNTY  
Edward R. Campbell  
Shirley J. Campbell  
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Frank H. Ogawa

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(Vice Chairperson)

SONOMA COUNTY  
Jim Harbersen

Commanding Officer  
Naval Base San Francisco  
Bldg. 1 Treasure Island  
San Francisco, CA 94130-5018

Attn: Mr. Randal Friedman Code 022

Gentlemen:

The District has received and preliminarily reviewed the Engineering Evaluation/Cost Analysis (EE/CA) and Work Plan for the Treatment and Removal of Metal-Contaminated Sandblasting Grit at Naval Station Treasure Island, Hunters Point Annex, California. We feel that there are deficiencies in these reports concerning the possible health impacts of air emissions from the proposed treatment processes that should be addressed.

The District requests that all treatment processes and other remedial actions that may cause emissions of air contaminants be fully described in the work plans and engineering evaluations in the following manner:

1. a complete detailed description of equipment and processes
2. an estimate of typical and worst case emissions of air contaminants (a comparison to data from similar remediation projects is preferred)
3. complete description of abatement equipment and procedures that are considered and estimation of emissions reduction
4. a estimation of the toxic impact of air emissions (guidelines in the District's Air Toxics Risk Screening Procedure, the CAPCOA Air Toxics Assessment Manual, or equivalent)
5. an evaluation if processes would cause odor problems or other public nuisance

For the EE/CA and Work Plan in question, it is our opinion that the estimation of emissions of air contaminants is both possible and necessary; that a complete description of the abatement processes and systems is lacking and necessary; that an analysis of the health impacts of the probable release of toxic air contaminants is necessary; and an evaluation of the release of hydrogen sulfide (H<sub>2</sub>S) and possible odor problems is also necessary.



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In general, we would probably regard diligent water spraying of the storage piles, work area and adjacent roads, loading hopper, and dry conveyors as minimum abatement for particulate emissions. However, more stringent controls such as chemical dust suppressants and filtration systems may be preferable if the health impact would justify one of them.

In section 7.5.2 of the Work Plan, hydrogen sulfide is discussed. District Regulation 9-2-301 limits ground level concentration of H<sub>2</sub>S to 0.06 averaged over three consecutive minutes or 0.03 ppm averaged over any 60 consecutive minutes. These limitations apply at the facility boundary (includes any tenant). Monitoring is planned at the work site and an action level of 10 ppm H<sub>2</sub>S is discussed. However, it has been the District's policy to recommend abatement systems on temporary treatment equipment if the H<sub>2</sub>S emissions exceed 1 ppm. Is it feasible to abate the H<sub>2</sub>S to minimize odors and irritation to tenants and residents? The District recommends an action level of 1 ppm at the work site.

If you have any technical questions concerning air toxics, please call Pat Holmes, Toxicologist, Toxics Engineering Section at (415) 771-6000, extension 226 or Steve Hill, Manager, Toxics Engineering Section at (415) 771-6000, extension 233. If you have any technical questions concerning dispersion modeling, please call Tom Perardi, Director, Planning Division at (415) 771-6000, extension 243. If you have any further questions, please call Permit Services at (415) 771-6000, extension 212.

It is not the District's intent to delay this or any other removal or remedial actions. We believe that the possible impact of the air contaminants from these actions can be normally addressed within the planning of these projects.

Very truly yours,

Scott Lutz  
Air Quality Engineer  
Permit Services Division

cc: Patricia Holmes  
Steve Hill  
Tom Perardi