



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

April 4, 1990

N00217.001233
HUNTERS POINT
SSIC NO. 5090.3

ALAMEDA COUNTY
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SOLANO COUNTY
Osby Davis
(Vice Chairperson)

SONOMA COUNTY
Jim Harberson

Ms. Louise Lew, Code 1811
Western Division
Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Dear Ms. Lew:

The District has received and preliminarily reviewed the Draft Air Modeling and Risk Assessment for the Removal Actions at the Tank Farm and Pickling and Plate Yard, Naval Station Treasure Island, Hunters Point Annex. Please contact the District's Planning Division when planning any complex modeling.

As we indicated last year, Industrial Source Complex (ISCST) is an acceptable dispersion model. However, your dispersion modeling used surface meteorological data collected at San Francisco International Airport and upper air data from the Oakland Airport. These data are not considered representative of the meteorological conditions present in the Hunters Point area. Where geographically representative meteorological data are not available, a screening approach as described in the CAPCOA Air Toxics Assessment Manual is recommended.

In addition, the ISCST model was used to estimate deposition of airborne particulate matter. Because of concerns regarding the technical basis of the ISCST deposition methodology, this model is not recommended for use in risk assessment. The preferred methodology is outlined in Appendix C.7 of the CAPCOA manual. Also, settling velocities used were in the wrong units (cm/sec instead of m/sec). This error caused a very conservative result. It appears that the inhalation exposure is much greater than the dermal exposure. A detailed revision of the deposition calculation does not seem beneficial.

The District does not want to discourage the Navy from using conservative assumptions in their risk assessment but simply wishes to point out what is generally accepted methodology.

B/N 7



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The District notes that the geometric mean of the 30 highest 24 hour averages was used for each site. As was indicated, this is very conservative and is acceptable to the District. However, the CAPCOA manual (p. 2.5-3) recommends using an annual average GLC for determining carcinogenic risk. The District generally uses an annual average GLC for non-carcinogens also. Your modeling is based on emission rates averaged over the actual working period. However for carcinogens, annualized emission rates are normally used. This is also appropriate for exposure to non-carcinogens with chronic effects. Evaluations of both annual average and short term exposure are appropriate for acute effects. The short term emissions are approximately 16 times greater than the annual average emissions at the Tank Farm and 36 times greater than annual average emissions at the Pickling and Plate Yard.

A detailed review of the toxicological data was not performed; the Department of Health Services indicated that they would provide this service.

If you have any technical questions concerning dispersion modeling, please call Brian Bateman, Senior Air Quality Engineer, Planning Division at (415) 771-6000, extension 266. If you have any technical questions concerning air toxics, please call please call me at (415) 771-6000, extension 212; Pat Holmes, Toxicologist, Toxics Evaluation Section at extension 226; or Steve Hill, Manager, Toxics Evaluation Section at extension 233.

Very truly yours,

Scott Lutz
Air Quality Engineer
Toxics Evaluation Section
Permit Services Division

cc: Patricia Holmes
Steve Hill
Brian Bateman

MAILING LIST: HUNTERS POINT REMEDIAL ACTION

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