

January 31, 2008

Scott Lutz
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

slutz@baaqmd.gov

RE: Health Risk Assessment for Pacific Steel Casting Company

Dear Mr. Lutz:

I am writing to express my concerns regarding certain aspects of the Health Risk Assessment (HRA) for Pacific Steel Casting Company (PSCC) prepared to meet the Air Toxics Hot Spots Program. I am a resident of west Berkeley. My current residence, where I have lived for the past 15 years, is approximately one mile east of PSCC.

A major concern I have are the data used to estimate the dispersal of emissions from PSCC as included in the HRA. These data appear to be based on wind direction and wind speed information obtained at the Richmond Field Station. While such data might be considered adequate for certain purposes, the Richmond Field Station data are not close enough to the true wind direction and speed to be acceptable for use in the HRA. The evaluation of the dispersal of PSCC's emissions into the residential areas of Berkeley is strongly influenced by the use of these data, which appear to substantially underestimate the extent to which emissions from PSCC travel eastward. The eastward dispersal of emissions is of importance because population density is higher in that portion of Berkeley than it is to the north of PSCC, which is the direction that dominates the values obtained at the Richmond Field Station.

The limited accuracy of the modeled dispersal of emissions based on the Richmond Field Station data also influence my second area of concern, the estimated cancer burden due to PSCC emissions. The cancer burden calculation includes only certain census centroids, based on the modeled dispersion of emissions. If the dispersion model uses wind data that don't accurately reflect wind patterns in west Berkeley, then the census centroids chosen for the cancer burden calculation are not correct, either. If the wind blows more often from west to east than the model predicts, then more areas that are more densely populated in west Berkeley would be impacted by emissions. This may or may not increase the cancer burden beyond the cut point used by BAAQMD to establish the need for additional action. However, given that the agency is using this information to make decisions that impact people's health, perhaps the accuracy of the modeled dispersal of emissions and resulting cancer burden could be improved.

Finally, while certain assumptions were made that are health protective in the HRA, such as long-term residence in the area and long-term employment, there are other factors that aren't included in the HRA that reduce the overall level of health protection provided by

the approach used. Most prominent among these is lack of consideration of the cumulative impacts of exposure to the pollutants emitted from PSCC over the years, together with the ongoing air pollution burden faced by west Berkeley residents related to extremely heavy traffic on the I-80 corridor. Although the current guidelines may not include specific direction on incorporating cumulative impacts into consideration of the situation, perhaps the BAAQMD should attempt to at least qualitatively factor in consideration of such disproportionate burdens faced by the community.

In closing, I'm grateful for the actions that the BAAQMD has taken to date, especially with respect to monitoring for the presence of particular pollutants in the neighborhoods near PSCC. I also would like to express my appreciation for the attempts made by PSCC to communicate with neighbors via the newsletters they've sent out. PSCC provides good jobs to local residents, and I sincerely hope that the company, with the help of BAAQMD, can find ways to continue to operate at the same time as they make substantial additional reductions in the emissions from their operations.

Thank you for the opportunity to provide these comments for your consideration.