NYC 9/11 Public Portal Document

THE CITY OF NEW YORK

DEPARTMENT OF HEALTH AND MENTAL HYGIENE

Michael R. Bloomberg
Mayor

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Commissioner

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MEMORANDUM

To: Technical Information Staff, NCEA-W (8623D)
US Environmental Protection Agency
Washington DC 20460

From: Kelly R. McKinney PE, Associate Commissioner, Environmental Health

Date: April 7, 2003

Subject: Comments on EPA/600/P-02/002A October 2002

The Department of Health and Mental Hygiene (DOHMH) submits the following comments on the EPA report "Draft Exposure and Human Health Evaluation of Airborne Pollution from the World Trade Center Disaster".

Generally, the report provides a clear characterization of ambient air issues and potential exposures. It also, however, discusses issues beyond the scope of the document. The report "relies primarily on the analysis of ambient air samples" but makes assumptions about indoor air exposures based on ambient air data or on a small number of indoor air samples.

For example, in the absence of data that would describe the relationship between particle configuration and location of exposure (indoor vs. outdoor), the report states (bottom of page 4): "indoor exposures...probably warrant more concern than outdoor exposures for possible acute irritative effects or more chronic health effects, not only because of the basic nature of some constituent particles but also because of other unusual features."

Similarly, the report includes other statements about indoor exposures as on the top of page 33: "...penetration of substantial quantities of WTC-derived dust into indoor office or residential spaces likely notably increased the potential for indoor exposures (via ingestion or by inhalation of re-entrained particles) to high levels of constituent elements and compounds." There is significant data (including the DOH/ATSDR indoor study and the DEP indoor database described on page 134) that contradict such a statement.

As always, we look forward to working closely with EPA on behalf of the residents of New York City.

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