



September 7, 2022

City of South San Francisco
Dept of Economic and Community Development
Billy Gross
Principal Planner
400 Grand Avenue, P.O. Box 711
South San Francisco, CA 94083

Dear Mr. Gross:

My name is Elizabeth (Betsy) Gilman Duane, and I am a biosafety consultant at Environmental Health & Engineering, Inc. I am a Registered and Certified Biosafety Professional through the American Biological Safety Association (ABSA) International and have 34 years of professional experience as a consultant to life science companies and as an Environmental Health & Safety (EH&S) leader at Amgen, Pfizer, and Wyeth. Many of these companies and facilities are located within central business districts of large cities adjacent to residential and commercial buildings.

I am writing to provide my support to future development of life science laboratories in the San Francisco Airport area, including laboratories that may store and use chemicals. It is my understanding that currently the Airport Land Use Committee (ALUC) regulations discourage aboveground bulk fuel storage in Safety Zone 4 (the Outer Approach/Departure Zone) and chemical uses involving the manufacture, storage, or processing of flammable, explosive, or toxic materials that would substantially aggravate the consequences of an aircraft accident.

A life science laboratory building does not typically contain an aboveground fuel storage tank to store chemicals used in laboratories. Life science companies procure chemicals in small containers such as four (4) liter bottles of solvents. These are stored in the appropriate storage cabinets such as a flammable storage cabinet until required for use and in many cases have a dedicated room designed for storage that is built with the necessary safety controls to protect the building, occupants, environment, and community. There is also no manufacturing or storage of explosive materials. While a life science entity may store and use small amounts of hazardous chemicals, **these activities do not utilize quantities that would aggravate the consequences of an aircraft accident.** Some examples include one-gallon bottles of bleach, a four-liter bottle of acetonitrile, and a 500-gram bottle of sodium hydroxide.

Laboratories storing, using, and disposing of chemicals in California are regulated at the local, state, and federal levels to ensure safety for laboratory staff, occupants of the building, the environment, and local community. Additionally, laboratory building construction is governed by building codes that allow for the storage and use of these chemicals on a laboratory scale. The company or institution is required to obtain any necessary regulatory permits. Internal program audits as well as inspections from regulatory authorities take place to ensure compliance. Emergency response planning in conjunction with local public safety agencies allows agency personnel to become familiar with the laboratory layout and locations for chemical use and storage.

There are numerous examples of life science laboratories located near airports and in some cases in one or more flight paths. In Boston, Massachusetts, for example, there are life science companies and academic institutions located in the area surrounding Logan Airport and, in some cases, directly in the flight path to/from Logan Airport. To my knowledge there has never been an incident involving life science laboratories and an aircraft incident.

In summary, laboratories located in Safety Zone 4 are likely to possess chemicals that will not substantially aggravate the consequences of an aircraft accident if such laboratories are designed, built, and utilized in accordance with established regulatory requirements and best practices.

Thank you for this opportunity to provide input. If you have any questions or would like to discuss further, please do not hesitate to contact me at 978-580-4339 or at egilman@att.net.

Regards,

A handwritten signature in cursive script that reads "Elizabeth Gilman Duane".

Elizabeth (Betsy) Gilman Duane, MS, RBP, CBSP
Biosafety Consultant