

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
OAKLEY, CA 94710-2737

(510) 540-3734



August 11, 1992

Ms. Louise T. Lew
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Dear Ms. Lew:

AIR QUALITY ANALYSIS FOR RI/FS, ALAMEDA NAVAL AIR STATION (ANAS)

The Department of Toxic Substances Control (DTSC) has completed its review of the Air Quality Analysis Report dated May 26, 1992. Please address the following comments and submit your response no later than September 10, 1992.

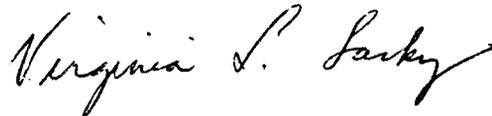
1. Climate data - Section 3.0, Climate, presents the rainfall for eastern Alameda County. The Alameda NAS is in western Alameda County. Although this is a very minor point, the rainfall should be stated for the correct portion of the county.
2. Sampler intake height - Section 4.0, Field Activities, indicates that the air intake to the sampling media was about three feet above the surface where the sampling pump was placed. EPA ambient air sampler siting criteria (40 CFR Part 58, Appendix E) recommends that the air intake be a minimum of two meters above the ground.
3. Target compound list - according to December 1988 Air Sampling Plan, ANAS will monitor for volatiles, semi-volatiles and metals at some of the sites including the Fire Training Area. Please provide rationale why only the volatiles and metals were monitored.
4. Sampling duration and flows - In Section 4.0, the sampling durations are stated as having been about 120 minutes with flow rated of about .19 liters/minute for VOCs and 1.5 liters per minute for metals and particulates. These brief sampling durations and low flows result in small air sampling volumes and an increased likelihood of results below the reporting limits. An example of this is the lack of detected concentrations of particulates as shown in Table 5-5.

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5. Reporting of metals and particulate data - Table 5-2 lists reporting limits of metals and particulates in concentrations of parts per billion (ppb). Concentrations of metals and particulates can only be listed in micrograms/cubic meter (weight/volume). Metals and particulate concentrations may not be converted to ppb (volume). The flow rate calculations of Appendix B only apply to gaseous compounds.
6. Preliminary risk assessment - Section 6.0, Conclusions, states that the air concentrations may be used to conduct a preliminary risk assessment. This data set may be too limited to be suitable for use as input to a preliminary risk assessment due to the following reasons: a) there is no description of whether the samplers were downwind of the potential emission points during the sampling periods; and b) the brief sampling periods are probably not sufficient to represent annual average air concentrations for estimating exposure.
7. Provide the schedule for implementing all comments.

If you have any question, please call Virginia Lasky at (510) 540-3817.

Sincerely,



Virginia L. Lasky
Associate Hazardous Materials
Specialist
Site Mitigation Branch

cc: Mr. Randy Cate
Alameda Naval Air Station
Building 114, Code 52
Alameda, California 94612

Mr. Gary Munekawa
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Fax Transmittal Sheet

State of California Environmental Protection Agency
Department of Toxic Substances Control, Region 2
Site Mitigation Branch
700 Heinz Avenue, Berkeley, California 94710

Date: 8/26/92 Number of Pages Including Cover 2

Deliver To:	From:
Name: <u>Gary Munekawa</u>	Name: <u>Virginia Lasky</u>
Phone: _____	Phone: <u>510-540-3817</u>

Comments: _____

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