



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

N00236.001100
ALAMEDA POINT
SSIC NO. 5090.3

June 17, 1992

1824 JAC 7/1
~~*1824*~~
1824 JAC 8/11

- ALAMEDA COUNTY
Edward R. Campbell
Loni Hancock
Greg Harper
Frank H. Ogawa
- CONTRA COSTA COUNTY
Paul L. Cooper
(Chairperson)
Ginny Wright McPeak
Tom Powers
- MARIN COUNTY
Al Aramburu
- NAPA COUNTY
Paul Battisti
- SAN FRANCISCO COUNTY
Roberta Achtenberg
Harry G. Britt
- SAN MATEO COUNTY
Gus J. Nicolopoulos
Anna Eshoo
(Vice Chairperson)
- SANTA CLARA COUNTY
Martha Clevenger
Rod Diridon
Joe Head
Channe McKenna
- SAN JOAQUIN COUNTY
Osby Davis
- SANOMA COUNTY
Jim Harberson
Patricia Hilligoss
(Secretary)

Commander, Western Division
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-2402

Reference: 5090 Ser 1811WW/L2271

Dear Commander:

Thank you for sending this District a copy of the Draft Air Quality Analysis for RI/FS Phases 2B and 3, NAS Alameda. Following careful analysis by Dario Levaggi, Director of the Technical Division, and Wayman Siu, Manager of the Air Monitoring Section, District staff have the following comments:

1. Table 5-2: Average sampling flow rate of 1.5 liters per minute seems too low, and average sampling time of two hours seems too short for proper sampling of metals and particulates. It is District practice to sample at higher flow rates and for four to eight hours duration to get a more representative sample.
2. Table 5-2: It is unclear why reporting limits for metals is expressed in parts per billion (ppb). Typically, particulates and metals in air are expressed in ug/m3 (weight per volume). Parts per billion is a volume per volume expression, appropriate for a water or soil sample perhaps, but not for solids (metals and particulates) in air.
3. Table 5-2: The reporting limit of 20,000 ug for particulates is very high. The Federal ambient air standard for PM10 is 150 ug/m3, and District measurements are well below this on a regular basis.
4. As a follow up to point #3, it is unclear how 4154.6 was derived as the particulate concentration.
5. Table 5-5: Staff do not understand the values presented for particulates.
6. Appendix C, Table 2: Sample M10: 3447.15 ug/m3 lead is a very high value for an ambient air sample. The Federal lead standard is 1.5 ug/m3 as a 24-hour average.

If you have technical questions concerning the District's comments, please call Mr. Siu at 415-771-6000, extension 4636. Thank you for the opportunity to comment.

Very truly yours,

Brian L. Jennison, Ph.D.
Enforcement Program Specialist

BLJ:blg

cc: Virginia Lasky, Department of Toxic Substances Control

1100

