UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105
SFD 8-3

September 15, 2005

Mr. Thomas Macchiarella, Code 06CA.TM
Department of the Navy, Southwest Division
Naval Facilities Engineering Command
1230 Columbia Street, Suite 1100
San Diego, CA 92101

RE: **Review of the Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan) Subslab Soil Gas Investigation of Buildings 14, 113, 162, 163 and 398, Alameda Point**

Dear Mr. Macchiarella:

EPA has reviewed the above referenced document, prepared by Sultech and submitted by the Navy on August 22, 2005. Due to the urgent nature of the sampling we have performed an expedited review and offer only major comments concerning the document.

If you have any questions, please call me at (415) 972-3029.

Sincerely,

Anna-Marie Cook
Remedial Project Manager

enclosure

cc list: Glenna Clark, SWDiv
Marcia Liao, DTSC
Judy Huang, RWQCB
Elizabeth Johnson, City of Alameda
Peter Russell, Russell Resources
Karla Brasaemle, TechLaw Inc

Review of the Draft Sampling and Analysis Plan
(Field Sampling Plan/Quality Assurance Project Plan)
Subslab Soil Gas Investigation of Buildings 14, 113, 162, 163 and 398, Alameda Point

GENERAL COMMENT

1. The Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan), Subslab Soil Gas Investigation of Buildings 14, 113, 162, 163 and 398 (the Draft SAP) does not provide a clear basis for the scope of this investigation. The Draft SAP proposes the installation of soil gas probes and subsequent soil gas sampling at five buildings, but there are additional buildings (e.g., Buildings 430, 627, 414, 372 and 360) over the volatile organic compound (VOC) Groundwater plume that are not proposed for investigation. Please clarify the logic train that was used to decide which buildings warranted sampling, and justify not performing sampling on other buildings which overlie or are in close proximity to high concentrations of soil gas VOCs.

SPECIFIC COMMENTS

1. **Section 1.2.1, Project Objectives, Page 10:** The proposed number of samples per square feet ranges from 1 per 3,500 square feet to 1 per 6,078 square feet and appears adequate but due to the limited number of samples and the uncertainty of the sub-slab conditions, it may be warranted to allow for some flexibility in placement of these gas probe locations. For example, if there are a large number of cracks or other potential indoor structural elements present in the vicinity of the sample location, it may be appropriate to relocate the sample point closer to these areas to approximate the concentrations of soil gas that may potentially enter into the structure. Please revise the Draft SAP to consider this approach or to more clearly define how the results may be interpreted to account for these issues.

2. **Section 2.2.1, Sampling Methods and Equipment, Page 33:** The procedures do not appear to include leak testing to evaluate whether atmospheric air is entering the probe, This is usually done by placing a cloth with isopropyl alcohol or a similar non-target volatile organic compound on the ground next to the probe. If isopropyl alcohol is detected in the sample, then the seal around the probe leaked. Please revise the Draft SAP to include leak testing in association with the collection of the actual soil gas sample.

3. **Section 2.3.4, Chain-of-Custody Procedures, Page 38; Section 2.3.5, Sample Shipment Procedures, Page 39; and Appendix E, SOP No. 019:** These sections include procedures for handling, preserving, packaging, and shipping sample bottles rather than Summa Canisters, which do not need to be wrapped in bubble wrap, chilled, or placed in coolers with ice. Please delete text that refers to bubble wrap, sample bottles, ice, and coolers and provide procedures for handling Summa Canisters.