

DEPARTMENT OF TOXIC SUBSTANCES CONTROLREGION 2
10 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-3724

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December 18, 1995

Commanding Officer
Engineering Field Activity West
Attn: Code 18, Mr. Ernesto Galang
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, California 94066-5006

Dear Mr. Galang:

**RESPONSE TO COMMENTS ON ALTERNATIVE METHODS FOR PAH ANALYSIS,
NAVAL STATION TREASURE ISLAND (NOVEMBER 18, 1995)**

The Department of Toxic Substances Control (Department) and San Francisco Bay Regional Water Quality Control Board have reviewed the Navy's response to comments on alternative methods for PAH analysis. The Department recommends the following clarifications be made to the responses to comments from the Hazardous Materials Laboratory:

1. The Navy needs to demonstrate that the alternative method (selective ion monitoring) can achieve equal or better data quality in terms of precision, accuracy, and detection limit for the pertinent parameters, compared to the CLP SVOA GC/MS method.
2. When PAH concentrations determined by HPLC are too low to be confirmed by the normal GC/MS method, the Navy should use another HPLC column, cryogenic focusing GC/MS, or other reasonable confirmation technique.
3. The Navy should specify that, where appropriate, gel permeation chromatography cleanup should be used to improve the detection limits.

If you have any questions regarding this letter, please contact me at (510) 540-3818.

Sincerely,

Mary Rose Cassa, R.G.
Engineering Geologist
Office of Military Facilities

cc: See next page

Mr. Ernesto Galang
December 18, 1995
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cc: Ms. Gina Kathuria
California Regional Water
Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

Ms. Rachel Simons [H-9-2]
U. S. EPA, Region 9
75 Hawthorne Street
San Francisco, California 94105-3901

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