



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

October 26, 1988

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Ms. Bella Dizon, Code 1147BD
Western Division, Naval Facilities Engineering Command
P.O. Box 727
San Bruno, CA 94066-0720

Gentlemen:

The District has reviewed the Sampling Plan (Vol. 1) and the Air Sampling Plan (Vol. 1B) for the RI/FS, Naval Air Station, Alameda. The District feels that the plan is adequate for the investigation. However, we have several minor comments.

The Air Sampling Plan using EPA and NIOSH methodologies is acceptable. However, the District uses Tedlar bags to sample ambient air for toxic volatile organic compounds and generally recommends Tedlar bags and/or passivated (Summa polished) stainless steel canisters for sampling of air contaminated with highly volatile compounds such as vinyl chloride. Generally very low detection limits (<1 ppb) are achievable using these methods. If inadequate data is generated by the initial sampling program, the District recommends that these methods be considered for a more rigorous sampling program. The Air Sampling Plan, did not include Tables 3.1, 3.2, and 3.3.

The Sampling Plan, Volume 1 (Section 3.3), describes Area 97. This area is contaminated with aviation gasoline. However, the Navy has already installed three ventilation fans in utility trenches at Area 97. One of these fans is currently operating and emitting approximately 24 lb/day of VOC (hexane and toluene detected). The District issued a violation notice to NAS in October, 1987 for the installation and operation of these sources. NAS then submitted a permit application for our review. The District wishes to be notified in advance of the installation of any source that is capable of emitting air contaminants. The District is concerned that no mention was made of this installation in the site description found in Section 3.3 of the Sampling Plan.

If you have any technical questions about sampling or analysis, please call Dario Levaggi, Director of Technical Services at (415) 771-6000, extension 220. If you have any further questions, please call Permit Services at (415) 771-6000, extension 212.

Very truly yours,

Scott Lutz
Air Quality Engineer
Permit Services Division

cc: Mr. Don Cox
Department of Health Services
Toxic Substances Control Division
5850 Shellmound Ave, Suite 100
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