MEETING MINUTES
JANUARY 28, 1994
DTSC OFFICES, BERKELEY, CALIFORNIA

Attendees: James Ricks, EPA
Mike Petouhoff, NAS Alameda
Tom Lanphar, DTSC
Chein Kao, DTSC
James Nusrala, RWQCB
Ron Gervason, RWQCB
Duane Balch, PRC
Susan Willoughby, PRC
Beth Kelly, PRC
Ken Leung, MW
Ruddie Clarkson, MW
Jeff Liu, MW
Mary Obland, WESTDIV
George Kikagawa, WESTDIV

The meeting was held at the DTSC offices in Berkeley, California, and started at 9:00 a.m.

1.0 QUANTITATION LIMITS

Duane Balch, PRC, opened the meeting. On December 20, 1994, the California EPA proposed quantitation limits for groundwater and soil samples to be collected at NAS Alameda. Since field work is beginning the week of January 31, 1994 for CTO 260, it will be necessary to discuss the plan of action in the event that the contract laboratories cannot meet all required quantitation limits.

In his January 26, 1994 letter to Mr. Lanphar, DTSC, Marcelo Pascua, WESTDIV explained that it is anticipated that the groundwater at the Base contains total dissolved solids in high enough concentrations to interfere with analysis for metals. This matrix interference will make it necessary for the laboratory to report data with quantitation limits higher than California EPA proposed limits.

In addition, PRC recognizes a potential problem of rejecting data through the validation process; the rejection of data would be due to strict validation criteria established in EPA's functional guidelines. If the analysis of blanks shows contamination, the sample results associated with the blanks are considered questionable, and may be rejected. The new quantitation limits are problematic in that the laboratories may not achieve contamination free blanks or may be reporting a fluctuating baseline, making the evaluation of the blank data difficult. The rejection of data could result in not having adequate data to perform a risk assessment for the base.

At a January 5, 1994 meeting, the issue of quantitation limits was discussed in response to the December 20, 1993 letter from Mr. Tom Lanphar to Mr. Munekawa. At that meeting, DTSC and RWQCB indicated that if it became evident that quantitation limits could not be achieved, the Navy would have to provide conclusive documentation to explain the problem. For this meeting today, Beth Kelly presented the kind of documentation that would be available from the laboratory to document the attempts to achieve the required quantitation limits. Beth also explained briefly the validation process

whereby it may be necessary to reject data based on the laboratory problems with blank samples.

Following Beth's presentation, Mr. Lanphar questioned whether the laboratories, given the problem of matrix interference caused by high total dissolved solids, would even be able to achieve the standard CLP quantitation limits. PRC responded that the matrix interference would still be a problem; past experience with NAS Alameda samples has shown that matrix interference has been a problem. Matrix spike and post digestion spike recovery data demonstrated matrix interference due to total dissolved solids. However, because the CLP quantitation limits are higher than California EPA proposed quantitation limits, less data would be rejected as a result of difficulties in evaluating the blanks.

A discussion ensued about how to deal with this problem of analyzing samples at low quantitation limits. Beth Kelly said that laboratories will produce recovery data on daily low level standards and that PRC could request the laboratories to provide, at no extra cost, a method detection limit study at these low levels. These data would allow DTSC and RWQCB to evaluate the severity of the problem.

Chein Kao, DTSC, indicated the need to address this problem as soon as possible because the field work is beginning; he suggested that DTSC and RWQCB meet separately to discuss the problems discussed at today's meeting. He also questioned why other facilities had not discussed similar problems with DTSC. PRC responded that in the case of NAS Alameda, the imminent field sampling had caused careful questioning of laboratories.

The consensus was that the Navy would make a best effort to have laboratories achieve proposed quantitation limits, and that the agencies would accept the laboratory documentation proposed at today's meeting; the agencies also indicated that they would evaluate what actions would need to be taken in the event that meeting quantitation limits is not possible.

2.0 SOIL DUPLICATES

Duane Balch, PRC, explained that the QAPP for field work at NAS Alameda provided for the collection of soil duplicates at a rate of ten percent of the total. Due to the heterogeneity of soils, soil duplicates are not truly representative of the same sample. Soil matrix differs with regard to metals concentrations within a very small spatial range. The validity of soil duplicates is questionable. Also, the cost of analyzing, in duplicate, ten percent of the total samples is significant. PRC suggested reducing or eliminating the collection of soil duplicates. Further, the laboratories always, as standard protocol, analyze a soil sample in duplicate when received from the field. The duplicate analyzed by the laboratory should be fully adequate, as such there is no technical reason for collecting and analyzing an additional field duplicate. The results of the analysis typically show a significant difference between duplicates, and for the purposes of risk assessment, the higher of the two values is used in calculations. This same approach could be taken with the duplicate analyzed, as standard protocol, by the laboratory.

Mr. Kao responded that DTSC prefers the work be conducted, as planned in the QAPP; the continuation of collecting ten percent soil duplicates was recommended.

Some discussion ensued about the actual requirement to collect ten percent soil duplicate samples. Some attendees thought there was no legal or technical requirement, but that the practice has been recommended as good practice in environmental sampling.

ADDITIONAL ITEM

Mr. Lanphar asked the Navy about their response to DTSC's letter on the IMF site. (Mr. Lanphar is referring to a letter which states the DTSC requests that the excavation at the IMF site be continued until all soil containing greater than 100 mg/kg lead is removed.) The Navy responded that the removal of soil to the 100 mg/kg lead limit would be continued, and that actual removal would occur during the Site 15 removal action in May 1994.

Mr. Lanphar also mentioned that for Site 15, the 1 mg/kg PCB action level previously discussed may not be appropriate. He cited a health based screening level for surface and subsurface soils, for residential/non-restrictive use scenario; the level is 0.03 mg/kg PCB (based on inhalation and ingestion). However, Mr. Lanphar went on to state that this was not a cleanup target from the DTSC, but rather the Navy would be responsible for selecting a target concentration for its' remedial action.

3.0 ARARs

Mr. Kao said that DTSC and RWQCB will not provide clean up levels for removal actions at NAS Alameda. He said the agencies can provide guidance, and that the Navy will have to use best judgement and guidance from the agencies. The Navy will have to perform the removal action, and take the risk of having to do further work if the operable unit risk assessment or basewide risk assessment finds there is still a risk at the removal action site. Susan Willoughby, PRC, questioned the RWQCB about guidance; recognizing that risk is not the criteria used by RWQCB to determine final cleanup levels, Susan questioned whether the Water Quality Assessment method (Jon Marshak, RWQCB) would be invoked as criteria. Ron Gervason, RWQCB, responded that the Marshak method would not be used verbatim, but it is probable that a specific portion of the method would be used. For example, Mr. Gervason mentioned that the use of deionized water extracts from site samples could be considered for use in evaluating the leachability of contaminants left in the ground.

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