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Ser 1811GM/L3139  
8 Jan 1993

Mr. Tom Lanphar  
Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710

**Subject: DATA VALIDATION FOR PHASES 1 AND 2A REMEDIAL INVESTIGATION/  
FEASIBILITY STUDY AT NAVAL AIR STATION ALAMEDA**

Dear Mr. Lanphar:

As per our recent conversations, this letter presents a summary of the chronology of activities in 1989 and 1990 associated with the Navy's preparation of, and subsequent California Department of Toxic Substances Control (DTSC) approval of the Quality Assurance Project Plan and Quality Assurance/Quality Control Plan document (herein referred to as the QAPP) for the Remedial Investigation/Feasibility Study (RI/FS) at Naval Air Station (NAS) Alameda.

DTSC comments on the QAPP, and Navy responses to these comments, are attached to this letter (Enclosures #1 through #4). Enclosure #5 is a June 18, 1990, letter from the DTSC concerning reduction of QA/QC sampling to 5 percent at NAS Alameda. Field activities and data validation issues related to the Phases 1 and 2A investigations at NAS Alameda were discussed as shown in the minutes (Enclosures #6, #7, and #8) of meetings held in 1990 (which were attended by the DTSC and others).

As outlined under U.S. Environmental Protection Agency (EPA) guidance for conducting an RI/FS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, Navy's previous contractor, Canonie, prepared the QAPP as part of the work plan documents required for the RI/FS at NAS Alameda.

The QAPP addresses, among other issues, the necessary procedures required to assure that the RI/FS is executed in a manner consistent with EPA guidance, with generally accepted and approved quality assurance objectives, and that the data generated is precise, accurate, representative, comparable, and complete. Towards meeting those objectives, the QAPP presented guidance and specifications for data reduction, validation and reporting, as well as internal quality control, audits, and data assessment.

As shown in enclosures #1 through #4, DTSC (then the California Department of Health Services [DHS]) comments were focused on field sampling procedures, project organization and procedural issues. No comments were made on data reduction, validation, or other data quality control issues. After submittal of the January 1990 version of the final QAPP, including Navy's responses to comments made by the DHS, it was implicitly assumed that the QAPP was approved as part of the work plan documents for the RI/FS at NAS Alameda. Subsequently, Canonie began work on the Phases 1 and 2A field investigations in mid-1990.

As outlined in the final QAPP, data quality control (QC) procedures for laboratory and field activities would include the sampling and analysis of at least ten percent soil and water replicates, water sample blanks, and blind samples. In mid-1990, the Navy requested a reduction in the number of QA/QC samples from ten percent to five percent. Enclosure #5 is the DHS letter approving the Navy's request.

Enclosures #6 and #7 show that Phases 1 and 2A laboratory analyses were performed in June 1990, and that as of October 1990, Canonie had prepared data validation packages (as discussed in the QAPP) for two percent of the samples analyzed. Canonie followed laboratory methods described in EPA guidance document SW-846, however, validation packages following EPA Contract Laboratory Program (CLP) Statement of Work were not generated, or specified in the final QAPP.

At this point in time, the RI/FS at NAS Alameda was in the process of being transferred to a new contract (CLEAN) and PRC Environmental Management, Inc. and its CLEAN team firm (James M. Montgomery Consulting Engineers, Inc. [JMM]) were being phased into the RI/FS. The PRC team proposed following CLP procedures for subsequent investigations, such as the investigation of the two NAS Alameda landfill sites under Phases 5 and 6. DHS representative Mark Malinowski indicated (Enclosure #7) that DHS's Hazardous Materials Laboratory protocol needed to be followed concerning full data validation packages, and that he would check to see if full CLP reports would be required.

At the November 1990 monthly progress meeting for NAS Alameda (Enclosure #8), comments concerning data validation for the Phases 1 and 2A investigation indicate that it would not be required. Further elaboration on Mr. Malinowski's statement in the previous monthly meeting minutes (Enclosure #7) concerning data validation packages was made at the November 1990 meeting. It appears that Canonie representative Mr. Tim Bodkin, stated that one to two percent of the Phases 1 and 2A samples had data validation packages, but that the validation review was not performed.

No further information concerning data validation for samples collected during Phases 1 and 2A has been found in Navy files. Canonie subcontracted with at least 11 laboratories to complete the analyses within appropriate holding times. Beyond completion of the field work and analyses, Canonie did not generate a summary report for the Phases 1 and 2A investigation. The Navy contracted with the PRC team to generate a data summary report (DSR) based on the Phases 1 and 2A data collected by Canonie in December 1991. As part of this task, the PRC team attempted to qualify and validate the analytical results supplied by Canonie. During this effort it became apparent that the supporting data quality control information was incomplete or missing, and that a validation (following EPA functional guidelines) of the Canonie data, comparable to that performed on the later Phases 2B/3, and Phases 5 and 6 investigations, would not be possible. As a result, the draft DSR was prepared without qualifying the analytical data. The text of the draft Phases 1 and 2A DSR (received by the DTSC on December 2, 1992) clearly states these limitations.

In conclusion, it is the Navy's position that the Phases 1 and 2A DSR, though lacking in data validation comparable to later DSR reports, should be considered as complete within the original specifications outlined in the final QAPP, as the DTSC did not specify in its review comments to the QAPP that CLP level data validation would be required. In late 1990, it was noted by either the DTSC or in the presence of the DTSC, that data validation would not be required of the Phases 1 and 2A analytical data. Based on the discussions provided above, the Navy considers the Canonie data for Phases 1 and 2A to be acceptable for use in the RI/FS process (that is for screening and locating future data gathering activities).

Please reply with comments/concurrence, regarding this matter, at your earliest convenience. For additional information you may contact either Mr. Gary Munekawa, Code 1811GM, (415) 244-2524, or Mr. George Kikugawa, Code 1811GK, (415) 244-2559.

Sincerely,

original signed by:

LOUISE T. LEW  
Head, Installation Restoration Section

- Encls: (1) DHS letter of April 10, 1989 w/Attachment A  
(2) WESTDIV letter of May 9, 1989 w/encl (1) and (2)  
(3) WESTDIV letter of Aug 31, 1989  
(4) WESTDIV letter of Feb 9, 1990 w/encl (1) and Appendix F  
(5) DHS letter of June 18, 1990  
(6) WESTDIV letter of July 23, 1990 w/encl (1)  
(7) WESTDIV letter of Nov 14, 1990 w/encl (2)  
(8) WESTDIV letter of Dec 21, 1990 w/encl (2)

Copy to:

California Regional Water Quality Control Board (Attn: James Nusrala)  
PRC Environmental Management, Inc. (Attn: Duane Balch)  
James M. Montgomery Consulting Engineers, Inc. (Attn: Ken Leung)  
NAS Alameda (Attn: Lt. Mike Petouhoff)

Blind copy to:

1811, 1811GM, 1811GK, 09CMN,  
Admin Records (3 copies)  
Chron, blue, pink, green  
Writer: Gary J. Munekawa/1811GM/X-2524  
File: NAS Alameda

ENCLOSURE 1

COMMENTS ON THE  
QUALITY ASSURANCE/QUALITY CONTROL  
QUALITY ASSURANCE PROJECT PLAN

DATED 10 APRIL 1989

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000339**

ENCLOSURE 2

TRANSMITTAL OF FINAL  
QUALITY ASSURANCE/QUALITY CONTROL PLAN  
AND RESPONSES TO COMMENTS

DATED 09 MAY 1989

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000342**

ENCLOSURE 3

RESPONSE TO COMMENTS ON THE  
QUALITY ASSURANCE PROJECT PLAN,  
HEALTH AND SAFETY PLAN, AND  
SAMPLING PLAN

DATED 31 AUGUST 1989

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.00385**

ENCLOSURE 4

TRANSMITTAL OF  
QUALITY ASSURANCE PROJECT PLAN  
QUALITY ASSURANCE/QUALITY CONTROL PLAN  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY

DATED 09 FEBRUARY 1990

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000430**

ENCLOSURE 5

DHS LETTER REGARDING REDUCTION IN  
QUALITY ASSURANCE/QUALITY CONTROL  
SAMPLES

DATED 18 JUNE 1990

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000497**

ENCLOSURE 6

TRANSMITTAL OF JUNE 1990  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
MONTHLY PROGRESS REPORT

DATED 23 JULY 1990

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000528**

ENCLOSURE 7

TRANSMITTAL OF OCTOBER 1990  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
MONTHLY PROGRESS REPORT AND  
23 OCTOBER 1990 PROGRESS REVIEW  
MEETING MINUTES

DATED 14 NOVEMBER 1990

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000536**

ENCLOSURE 8

TRANSMITTAL OF NOVEMBER 1990  
REMEDIAL INVESTIGATION/FEASIBILITY STUDY  
AND 28 NOVEMBER 1990 PROGRESS REVIEW  
MEETING MINUTES

DATED 21 DECEMBER 1990

IS FILED AS ADMINISTRATIVE RECORD NO.  
**N00236.000538**