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ALAMEDA POINT
SSIC NO. 5090.3

STATE OF CALIFORNIA — ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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June 10, 1993

Mr. Gary Munekawa
Code 1811
Naval Facilities Engineering Command
Western Division
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Munekawa:

DRAFT FIELD SAMPLING PLAN FOR FOLLOW-ON WORK REMEDIAL INVESTIGATION/FEASIBILITY STUDY PHASES 2B AND 3, NAVAL AIR STATION, ALAMEDA

The Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (RWQCB) has reviewed the Draft Field Sampling Plan for Follow-On Work Remedial Investigation/Feasibility (RI/FS) Study Phases 2B and 3. Below are the comments of the DTSC. The RWQCB has reviewed the DTSC comments and concurs with its contents. The comments shall be addressed and incorporated in the draft final Field Sampling Plan for Follow-On Work RI/FS Study Phases 2B and 3.

1. <u>Page 3-1, Section 3.1, Physical Description and Site History</u>

   The first paragraph should clarify that Site 4 of Phases 2B and 3 now includes all of Building 360.

2. <u>Page 3-6, Section 3.6.1, Soil Sampling and Figure 3-1</u>

   The last sentence of the second bullet item states that borings will be located near the center of each wall of the building; however, Figure 3-1 locates the borings near the corners of the building.

3. <u>Page 3-6, Section 3.6.1, Soil Sampling, Second Bullet Item</u>

   Please identify what the soil samples will be analyzed for. When analyzing for TPH, BTEX must be included in the analysis. This is because BTEX is important in calculating risk associated with petroleum. BTEX should be included in the analysis of all samples tested for TPH.

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4. Page 3-6, Section 3.6.1, Soil Sampling, Third Bullet Item

   SVOCs should be included in the analysis for soil borings under the building.

5. Page 3-7, Section 3.6.2, Cone Penetrometer

   SVOC and TPH have been found in the groundwater at Site 4. For this reason, SVOC and TPH should be included in the analysis of groundwater.

6. Page 3-8, Section 3.6.3, Shallow Monitoring Wells

   SVOC and TPH have been found in the groundwater at Site 4. For this reason, SVOC and TPH should be included in the analysis of groundwater.

7. Page 4-6, Section 4.7.1, Soil Sampling

   The VOC 111, Trichloroethane was measured at 39,000 μg/kg in the sample collected at 14 feet bgs from B05-11. The Sampling Plan, however, suggests samples be taken from only 2.5 and 5 feet bgs. Soil samples should be collected at a depth similar to where contamination was found in B05-11.

8. Figure 5-2, Site 6 Geologic Cross Section A-A', B-B'

   An explanation for "GW" is absent from the legend. Please ad "GW" to the legend.

9. Page 6-5, Section 6.6.1, Soil Samples, Second Bullet Item

   SVOCs were also detected in M07A-02 at 7 feet. For this reason, SVOCs should be included in the analysis.

10. Page 6-7, Section 6.6.5, Non-Point Source Sampling

    Please explain the function of the grease trap within the storm drain system. How often is sludge removed for the grease traps? Has the grease been tested before? What were the results?

11. Page 9-2, Section 9.4.1, Soil

    Is there evidence to suggest that bis(2-ethylhexyl)phthalate may have been introduced in the sampling process?

12. Page 9.3, Section 9.5.3, Shallow Monitoring Wells

Has the source for the VOCs and SVOCs detected in Well M10-01 been identified?

13. Page 9.3, Section 9.5.3, Shallow Monitoring Wells and Figure 9-3

Because the direction of groundwater beneath Site 10A is towards the east, there is no down-gradient well at Site 10A. A fourth monitoring well should be installed north of building in order to provide for a down-gradient sampling point.

14. Page 10-1, Section 10.0 Site 12 - Building 10, Power Plant

This site contains three abandoned Underground Storage Tanks (USTs) and one white gas UST. Apparently, the USTs will be handled under the UST Program. However, the USTs may be a source for contamination at Site 12. If the tanks have been investigated under the UST Program the results should be summarized in this Sampling Plan.

Additional investigations of the USTs may be necessary at Site 12. The occurrence BTEX in the soil and groundwater must be determined. This would require at least one down-gradient monitoring well and three soil borings near the three abandoned USTs. The white gas UST must also be adequately investigated. This would require at least two soil boring, with one being converted into a down-gradient monitoring well.

15. Page 11-2, Section 11.3 Site Geology/Hydrogeology

The configuration of the groundwater table during low and high tide as shown in Figures 11-4 and 11-5 are different than the configurations shown in Figure 13-3 and 13-4 of the Final Data Summary Report for Phases 2B and 3. What conclusions can be made about the direction of groundwater flow at Site 14?

16. Page 11-3, Section 11.5.1 Soil Sampling, First Bullet Item and Locations of Soil Borings on Figure 11-1

The selection of soil boring locations should more closely relate to the data gathered during the soil gas survey. Borings should be taken where the highest soil gas levels were located. For example; the three locations where soil gas was measured at 140 μg/L, 130 μg/L, and 180 μg/L.

17. Page 11-3, Section 11.5.1, Soil Sampling, First Bullet Item

    Soil analysis should include SVOCs, PAH, BTEX, and dioxin/furan

18. Page 11-3, Section 11.5.1, Soil Sampling, Second Bullet Item

    Soil analysis should also include SVOCs, PAH, and BTEX.

19. Page 11-4, Section 11.5.3, Shallow Monitoring Wells

    According to Figures 11-3 and 11-4, the direction of groundwater during low-tide is due north, while during high-tide the direction is due east. The average direction, however, is toward the north-west. The placement of groundwater monitoring wells does not satisfactorily take into account the changing direction of groundwater. Therefore, a forth monitoring well is needed north-west of the Fire Training Area.

20. Page 12-2, Section 12.5.1 Soil

    The discussion on soil contamination failed to include the SVOC contamination occurring at the surface in the southern section of Site 15. The highest concentrations of SVOC at the surface are found near Building 283. The section also failed to identify the location of the soil sample collected at 2 feet bgs that contained SVOCs.

21. Page 12-3, Section 12.6.1 Soil Sampling

    The occurrence of SVOC in the soil must be further investigated and the source of the SVOCs needs to be identified. Surface sample S15-12 should be recollected and reanalyzed because of the high detection limit reported in the Final Data Summary Report Phases 2B and 3.

22. Page 14-2, Section 14.1.5 Soil Sample Retrieval and Handling

    Soil samples that are to be sent to the laboratory for analysis should not be field screened for VOCs.

If you have any questions on these comments or require further assistance, please call me at (510) 540-3809.

Sincerely,

Thomas P. Lanphar
Project Manager
Site Mitigation Branch

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