

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2
100 HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737



June 13, 1994

Commander
Western Division
Naval Facilities Engineering Command
Attn.: Mr. Gary Munekawa, Engineer in Charge
Code
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Munekawa:

**REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN ADDENDUM
DRAFT, NAVAL AIR STATION, ALAMEDA**

The California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) have reviewed the draft RI/FS Work Plan Addendum dated September 29, 1993. The Work Plan addendum includes a revised Health and Safety Plan (H&SP), Quality Assurance Project Plan (QAPP), Community Relations Plan (CRP), Project Management Plan/Schedule Revisions (PMP/SR), Data Management Plan (DMP), Public Health and Environmental Evaluation Plan (PHEEP), and Feasibility Study Plan (FSP). Comments on the H&SP were prepared by DTSC staff Industrial Hygienist. The RWQCB reviewed and prepared comments on the QAPP. Their comments are enclosed. The following are the Cal/EPA comments on the RI/FS Work Plan Addendum.

General Comments

1. The format for revising the Canonic Work Plans is confusing and difficult to follow. With the exceptions of the H&SP and the QAPP, none of the Work Plans were complete revisions. The revisions to the CCR, PMP/SR, DMP, PHEEP, and FSP were simply statements of how the original work plans are to be amended. For that reason the Work Plans final formats are unclear. This format also made the review of the documents difficult. Further, if this is to be the final format, the usefulness of the documents is questionable.

2. Complete and final documents are needed for the H&SP, QAPP, CRP and DMP. The PMP/S should be incorporated into the BRAC Cleanup Plan. The utility of the PHEEP and the FSP is questionable. The original PHEEP and FSP should not be revised nor implemented by the project team.

1066



Mr. Gary Munekawa
June 13, 1994
Page Two

3. The Navy should respond to Cal/EPA comments on the QAPP and H&SP prior to generating final documents. Draft final documents are not needed for the QAPP and H&SP. New draft documents should be produced for the CRP and DMP. These draft documents will require full review by Cal/EPA.

Health and Safety Plan

1. Section 2.0, Assignment of Responsibilities, Page 2-1

The California Code of Regulations (CCR) Section 5192(b)(2)(A)(5) requires identification of lines of authority and their responsibilities. Key personnel were not identified by name. Please identify key personnel by name and specific assignment for this project. Include the site and office telephone numbers of key personnel.

2. Section 6.0, Health Hazard Assessment, Page 6-1

A concise description (narrative) was not provided for the contaminants. Please provide a concise description of the primary health risks associated with contaminants. This should include chemical, physical, and toxicological characteristics of the contaminants, such as vapor pressure, odor threshold, potential routes of entry, physical state expected (e.g. gas, vapor, aerosol), target organs, acute and chronic effects, etc.. This narrative may be augmented by a quick-referenced chart of chemical hazards, such as the Table 1-1, 1-2, and 1-3.

Some inaccuracies and notable omissions of important toxic effects and/or target organs were found in the description provided. Please review current Cal/OSHA PEL's and amend Tables where needed. The following are examples of those inaccuracies and omissions.

Example of an inaccuracy: Table 1-1

Methylene chloride was listed incorrectly with a 100 ppm PEL.

Example of a notable omission: Table 1-21

Planned drilling rig operations inside building structures could produce a carbon monoxide exposure problem. An adequate description of this potential contaminant was not provided.

Examples of key information omitted regarding toxic effects or of a listed substance: Table 1-1

Blood disorders associated with benzene were not addressed.

Mr. Gary Munekawa
June 13, 1994
Page Three

3. Section 7.0, Standard Operating Procedures, Page 7-1

The Standard Operating Procedures should include a section on General Safe Work Practices. This section would describe safe work practices that will be employed at the site, and address specific issues such as personal hygiene, drill rig safety, trenching safety, site entry protocol, and smoking/eating restrictions.

4. Section 7.0, Standard Operating Procedures, Page 7-3

The plan fails to identify the required elements of a site control program as per CCR 5192(d).

Community Relations Plan

1. The Community Relations Plan requires complete revision. The three page addendum does not suffice as a revised, updated CRP. A new CRP must be written and reflect base closure, the BRAC Cleanup Plan, and the addition of the Restoration Advisory Board.

2. New community assessment interviews are needed. Interviews should be conducted with a diverse group of individuals including new local elected officials, new neighbors, and special interest organizations.

3. The mailing list requires updating.

Project Management Plan/Schedule revisions

1 The Navy should propose what they want to do with the PMP/S. Perhaps, the PMP/S should be incorporated into, or replaced by the BRAC Cleanup Plan (BCP).

2. Page 5-2, Project Organization

The project team, as described, does not include the Department of Toxic Substances Control, Regional Water Quality Control Board and the U.S. Environmental Protection Agency. The BRAC Cleanup Team is not discussed in the organization.

3. Page 5-6, Environmental Assessment Team:

The name of this team should be the Ecological Assessment Team.

Data Management Plan

1. The Data Management Plan should be fully revised. The Data

Mr. Gary Munekawa
June 13, 1994
Page Four

Management Plan should, amongst other things, describe data needs of the planned Geographic Information System and the sharing of data between the various contractors working on the remediation of Naval Air Station, Alameda.

Public Health and Environmental Evaluation Plan

1. The Work Plan Addendum states that the human health Risk assessment and work plan for the ecological assessment will supersede the Canonic Public Health and Environmental Evaluation Plan (PHEEP). That is appropriate, therefore, the PHEEP has no influence on future work at Naval Air Station, Alameda. There is no need for a revised the PHEEP. The original Canonic Work Plan should be left as is.

Feasibility Study Plan

1. What does the Feasibility Study Plan have to do with the preparation of a Feasibility Study? This plan is unnecessary, therefore, we will not provide comments.

If you have questions regarding these comments, please contact me at (510) 540-3809.

Sincerely,



Thomas P. Lanphar
Project Manager
Office of Military Facilities

Enclosure

cc. Mr. James Nusrala
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

Lt. Mike Petouhoff
Base Environmental Coordinator
Alameda Naval Air Station
Building 1, Code 52
Alameda, California 94501

Mr. James Ricks
U.S. Environmental Protection Agency
H-92
75 Hawthorne St.
San Francisco, California 94105

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
101 WEBSTER STREET, SUITE 500
OAKLAND, CA 94612
(510) 286-1255



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

May 6, 1994
File No. 2199.9285 (JBN)

Subject: Naval Air Station Alameda, Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan Addendum, September 29, 1993

Dear Mr. Lanphar,

The San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) has completed its review of the above mentioned document. Below are the comments from this review.

General Comments:

1. Lower quantitation limits for organics and detection limits for benzene shall be implemented in future soil and water analyses at NAS Alameda. The most recent Quality Assurance Project Plan (QAPP), which is Section 3 of the RI/FS Work Plan Addendum, includes some quantitation limits for metals and benzene in soil and water which are too high to make comparisons with two water quality standards. These two water quality standards are the State of California Maximum Contaminant Levels (MCL's) or Secondary Maximum Contaminant Levels (SMCL's), and the SFBRWQCB Basin Plan Water Quality Objectives. (Basin Plan) Please reference the December 20, 1993 letter from the California Environmental Protection Agency (Cal EPA) in future versions of the QAPP in the RI/FS Work Plan Addendum.

2. The Navy will be required to meet all of the above described quantitation limits in future analyses at NAS Alameda. In the case that the Navy cannot meet any of the quantitation limits for whatever reason, i.e. because of matrix interference, an explanation shall be included in the quality control section of the report for each instance. The explanation shall include laboratory specific data if appropriate to support the Navy's case that a quantitation limit could not be met. Please reference the December 20, 1993 letter from Cal EPA on this matter in future versions of the QAPP in the RI/FS Work Plan Addendum.

3. This change in quantitation limits will create a new problem in future work at NAS Alameda. This is comparing new soil data, collected with low quantitation or detection limits, with soil data previously collected that has a higher quantitation limit. This creates obvious problems in site characterization and risk assessment. There may be instances, where previously collected soil data, which yielded non-detect results, would require resampling so it could be

compared with new soil data, containing lower quantitation limits. However, the SFBRWQCB does not wish that the Navy resample soil in all cases. Please see the December 20 letter, which addresses this matter and spells out specific guidelines when soil data would need resampling at NAS Alameda.

Specific Comments:

1. Section 3.1.2.2, Accuracy, Please reference, in this section, the increased accuracy that soil and water measurements for select inorganics and benzene will have now that lower quantitation limits will be implemented as per General Comment #1.

2. Section 3.1.2.5, Comparability, Please reference the comparability problem that will arise when lower quantitation limits are implemented in future soil analysis, in this section. General Comment #3 addresses this concern

3. Section 3.2, Sampling Procedures, The wording "and the FSP for the Phase 2A sites has not been written", shall be omitted from the first paragraph.

4. Section 3.8.3.2, Laboratory Data Reporting, last bullet item, Please add ",or in achieving the quantitation limits for soil and water specified in the revised QAPP", to the end of the sentence in the last bullet item. General Comment #2 illustrates the need for this further.

5. Table 3-6, Volatile Organic Compounds, Reporting Limits, CLP Routine Analytical Services and Special Analytical Services, Please change the reporting limit for benzene from 2 ug/l to 1 ug/l. See General Comment #1 or the December 20, 1993 letter.

6. Table 3-10, Inorganic Target Analyte List Detection Limits, The water contract required detection limits for the following metals shall be as follows. See General Comment #1, or the December 20 letter.

Metal	Detection Limit
Aluminum	50 ug/l
Antimony	6 ug/l
Beryllium	4 ug/l
Copper	4.9 ug/l
Nickel	8.3 ug/l
Silver	2.3 ug/l
Thallium	2 ug/l

7. Table 3-10, Inorganic Target Analyte List Detection Limits, The soil contract required detection limits for the following metals shall be as follows. Also, please see General Comment #1 or the December 20 letter.

Metal	Detection Limit
Antimony	2.76(0.6) mg/kg ¹
Beryllium	0.4 mg/kg
Cadmium	0.5 mg/kg
Copper	0.49 mg/kg
Lead	0.05 mg/kg
Mercury	0.0036 mg/kg
Nickel	1.48 mg/kg
Silver	0.26 mg/kg
Thallium	0.56 mg/kg

1. The RWQCB requires that a quantitation limit of 0.6 mg/kg be applied for soil work at NAS Alameda. The Navy proposed to use a quantitation limit of 2.76 mg/kg. The issue is to be resolved at a later time.

If you have any questions on the above letter please contact me at (510) 286-0301.

Sincerely,



James Nusrala
Project Manager