

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 2

HEINZ AVE., SUITE 200
BERKELEY, CA 94710-2737

(510) 540-2122



January 30, 1995

Commander
Western Division
Naval Engineering Facilities Administration, West
Attn.: George Kikugawa
Code 09ER3GK
900 Commodore Drive
San Bruno, California 94066-2402

Dear Mr. Kikugawa:

TOTAL METAL ANALYSIS FOR GROUNDWATER SAMPLES AT NAVAL AIR STATION, ALAMEDA

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB) request that the Navy collect a representative number of unfiltered samples for metals in all future groundwater investigations at Naval Air Station (NAS), Alameda. This letter forwards a concurrent request by the San Francisco RWQCB.

The Navy should prepare a plan to address the procedures, locations and number of wells for the unfiltered groundwater sampling and submit this to the State. The DTSC and RWQCB recommend that a representative number of unfiltered groundwater samples be taken during the current quarterly groundwater monitoring cycle. This data can then be compared to filtered groundwater samples collected from the same wells. The collection of unfiltered groundwater samples is important for completing the ecological assessment.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas P. Lanphar".

Thomas P. Lanphar
Project Manager
Office of Military Facilities

Enclosure

cc: See next page

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Mr. George Kikugawa
January 30, 1995
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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

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CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

2101 WEBSTER STREET, SUITE 300

OAKLAND, CA 94612

(510) 286-1733



Mr. George Kikugawa
Project Manager
Navy Engineering Facilities Administration, West
900 Commodore Drive
San Bruno, CA 94066-2402

January 10, 1995
File No. 2199.9285 (JBN)

Subject: Unfiltered Metals Analysis for Groundwater at Naval Air Station, Alameda

Dear Mr. Kikugawa:

Staff at the Regional Water Quality Control Board (RWQCB) request that the Navy collect unfiltered samples for metals in all future groundwater investigations at Naval Air Station (NAS), Alameda. This letter is in response to your telephone call on January 6, 1995, asking that this agency express this request in writing. Presently, the Installation Restoration (IR) program is collecting only filtered metals groundwater samples. The RWQCB is not asking the Navy to discontinue taking filtered samples for metals. The RWQCB simply wants the Navy to analyze a subset of the groundwater samples using the unfiltered metals analysis. This request would apply to all future groundwater investigations at NAS Alameda, including the IR program, the Underground Storage Tank program, and any sampling associated with the Parcel-Specific Evaluation Plans.

There are three reasons the RWQCB is requesting a subset of wells to be investigated using the unfiltered metals analysis. First, Section 4.5.3 of Risk Assessment Guidance for Superfund (RAGS), says, "if unfiltered water is of potable quality, data from unfiltered water samples should be used to estimate exposure". The potability of the groundwater at NAS Alameda has not been officially determined yet. Until the Navy has presented an acceptable argument for non-potability of the groundwater at the base to the RWQCB, this part of RAGS would apply. Secondly, unfiltered metals analysis needs to be performed as the migration pathway between the groundwater at NAS Alameda and San Francisco Bay (with its aquatic receptors) is complete. Unfiltered analysis would allow us to see the total (both suspended and dissolved) portion of the metals concentration in groundwater. Lastly, if there are any residential wells in use in the vicinity of NAS Alameda, the migration of potentially contaminated groundwater from base property to off-site groundwater needs investigation. Unfiltered metals analysis needs to be performed here if this pathway proves to be complete, as it is unlikely that local residents would be filtering their well water to water lawns, gardens, etc.

Unless this office hears otherwise from the Navy within the next 30 days, we will assume the Navy is willing to comply with the provisions outlined in this letter. If you have any questions on this issue, please contact me at (510) 286-0301.

Thank you,


James Nusrata
Remedial Project Manager