



September 14, 2005

Mr. Thomas L. Macchiarella
BRAC Environmental Coordinator
Navy BRAC Program Management Office
1230 Columbia Street, Suite 1100
San Diego, CA 92101-8571

Re: Comments on August 22, 2005 *Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan), Subslab Soil Gas Investigation of Buildings 14, 113, 162, 163, and 398*

Dear Mr. ^{Thomas}Macchiarella:

Thank you for the opportunity to comment on the Navy's August 22, 2005 *Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan), Subslab Soil Gas Investigation of Buildings 14, 113, 162, 163, and 398 (Draft SAP)*. The Alameda Reuse and Redevelopment Authority (ARRA) believes this investigation will provide much needed information. In general, ARRA finds the *Draft SAP* to be well designed. The ARRA's few comments are as follows.

GENERAL COMMENTS

1. Please provide the ARRA with a schedule for the proposed sampling mobilizations. As explained in the ARRA's August 3, 2005 letter to you re *Navy Response to ARRA Comments on "Draft Final OU-2B Remedial Investigation Report, Sites 3, 4, 11, and 21, Alameda Point, Alameda, California"*, the ARRA believes indoor air samples should be promptly collected and analyzed. Accordingly, the ARRA plans concurrent sampling of indoor and ambient air at some or all of the five buildings targeted by the *Draft SAP*. The ARRA needs at least a two-week advance notice to mobilize for indoor and ambient air sampling.

Development Services Department

Alameda Point Main Office
950 West Mall Square,
Alameda, CA 94501-7552
510 749.5800 • Fax 510 749.5808 • TDD 510 522.7538



2. Please provide details concerning tenant outreach, including how and when the Navy plans its tenant coordination efforts. Because the ARRA will be collecting concurrent samples from the same buildings, the Navy and the ARRA would be least disruptive of the tenants by working together on this matter.

SPECIFIC COMMENTS

1. Section 1.1.6.1 Soil and Groundwater Investigations (p. 7 top) Figure 2 shows that chlorinated VOC groundwater plumes occur in IR Site 3, yet this paragraph discusses only nonhalogenated VOCs. If this paragraph is a discussion of only chemicals detected in soil, that fact should be stated.
2. Section 1.1.6.1 Soil and Groundwater Investigations (p. 7 middle) The last sentence of the third paragraph on this page suggests that chlorobenzene and methylene chloride detections in soil are “likely associated with laboratory contamination of the samples.” Although methylene chloride is a common laboratory contaminant, chlorobenzene is not. This is largely due to the much lower vapor pressure of chlorobenzene. Additional information should be provided to support the laboratory contaminant status of chlorobenzene in this instance or the misleading text should be changed.
3. Section 1.1.6.1 Soil and Groundwater Investigations (p. 8 top) The statement “It is likely that the chlorinated solvents in groundwater originated at Building 360 and have migrated west of Buildings 162 and 014” should include Building 113 as a third building beyond which the plume has migrated.
4. Table 1: Data Quality Objectives (p. 15 middle) Step 4 mentions a “schedule presented in the SAP”. However, the SAP does not contain a schedule. Please provide the schedule for this work, including the beginning and duration of both sampling mobilizations.
5. Table 1: Data Quality Objectives (p. 15 bottom) Step 5 decision rules repeatedly use the word “may”. Normally rules are more decisive and categorical. Please state the other actions that may occur instead if the stated action does not occur. Further, element 1a of Step 5 is difficult to understand. Please clarify.
6. Section 1.3.2.6 Detection and Quantitation Limits (p. 19 middle) PRRLs are **minimum** quantitation limits, not **maximum** quantitation limits.
7. Section 2.3.5 Sample Shipment Procedures (p. 39 top) The first bullet incorrectly suggests the Summa canisters must be kept cool. The paragraph immediately before the bullets correctly notes “no refrigeration is required.” Please make the text consistent.
8. Section 2.4.2 Project Analytical Requirements (p. 42 bottom) The text incorrectly attributes EPA Method TO-15 to EPA’s SW-846. The correct EPA citation for this method is *Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air*, Second Edition, EPA/625/R-96/010b, January 1999.

For brevity, comments noted by DTSC in its September 7, 2005 letter concerning the *Draft SAP* have not been repeated here. Thank you for considering the ARRA's comments. If you have any questions or need additional information, please contact me or Dr. Peter Russell at (415) 492-0540.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Debbie Potter', with a stylized, cursive script.

Debbie Potter
Base Reuse and Redevelopment Manager

cc: Anna-Marie Cook, USEPA
Judy Huang, RWQCB
Marcia Liao, DTSC
Peter Russell, Russell Resources, Inc.