State of California

Department of Health Services

M60050.000675
MCAS EL TORO
SSIC #5090.3

Memorandum

Date: December 19, 2000

To: Ms. Triss Chesney
Department of Toxic Substances Control (DTSC), Region 4
Office of Military Facilities
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Cypress, California 90630

From: Environmental Management Branch
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Subject: Review of *Draft Final Radiological Survey Plan, Marine Corps Air Station (MCAS), El Toro, California, November 2000.*

Attached are The Department of Health Services' (DHS) comments on the subject report. This review was performed by Ms. Deirdre Dement, Associate Health Physicist, in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this review, or if you need additional information, please contact Ms. Dement at (916) 324-1378.

Darice G. Bailey, Chief
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Department of Health Services

Review of *Draft Final Radiological Survey Plan Marine Corps Air Station, El Toro, California, November 2000*

December 19, 2000
DTSC Resource Planning Form # 518

The following comments and questions are in response to the request from Ms. Triss Chesney of the Department of Toxic Substances Control to review the *Draft Final Radiological Survey Plan, Marine Corps Air Station (MCAS), El Toro, California, November 2000.*

General Comment:

1. DHS cannot tell from this draft survey plan whether the information will be sufficient to characterize the surface contamination since no derived concentration guideline level (DCGL) or release limits have been established before this survey commences. The following comments address some of the specific concerns DHS has with this document.

Specific Comments:

1. Page 7, Section 1.1, Page 13, Section 1.3.5 and Department of the Navy (DoN) Response to DHS General Comment 1: DHS has not received the *Draft Radiological Release Report*, which was to be available in November 2000.

2. Page 8, Section 1.1: The long term monitoring and institutional controls of the "preferred remedy" will require input from the State of California DHS Radiologic Health Branch. If it is determined that discrete sources are present or residual contamination exceeds the limits for unrestricted release, DHS will include its control mechanisms as part of the institutional controls. These controls could include licensure for the radioactive material. Any Record of Decision (ROD) should take into account the possibilities that longer monitoring than normally required for chemical monitoring and/or licensure by the State may be necessary to ensure the institutional controls are met.

3. Page 24, Sections 5.1 and 5.2 and DoN Response to DHS General Comment 4, Page 3: Multi-Agency Radialtion Survey and Site Investigation Manual (MARSSIM) classifies sites by their potential for contamination and not whether they were previously licensed. The Navy did not license radium, but areas with potential radium contamination (e.g. radium dials, radium-contaminated ductwork, radium paint room components, etc.) would certainly be considered Class 1 until it was

Specific Comments: (Continued.)

demonstrated or documented otherwise. DHS has not seen sufficient evidence to suggest that the likelihood of finding radium contamination is the same at all of the sites at El Toro. The areas with a higher probability of contamination (e.g., where radium dials were potentially disposed, recovered, or where remediation took place) should be designated Class 1. Discrete sources (e.g., radium dials, etc.) must be removed for unrestricted release as DHS does not have an acceptable release limit for discrete sources. DHS may also require licensure for sites that do not meet the criteria to be released for unrestricted use. If the sites are not surveyed using the correct classification, the grid spacing, number of samples, etc. may not be sufficient to meet the MARSSIM strategy.

4. Please note that in MARSSIM, Page 5-4, Section 5.2.5, regarding documentation, "Sites being released from further consideration should provide a level of documentation consistent with final status survey reports." It appears from your response to General Comment 5, that the Navy does not have sufficient information for DHS to determine if the screening levels would meet the yet undetermined DCGLs. It appears that the Navy intends to wait until after the survey is completed to propose DCGLs and determine if this survey detected at levels below the DCGL.