



Department of Toxic Substances Control



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SSIC #5090.3

August 13, 2001

Mr. Dean Gould
BRAC Environmental Coordinator
Marine Corps Air Station El Toro
Base Realignment and Closure
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DRAFT TECHNICAL MEMORANDUM, PHASE II EVALUATION OF RADIONUCLIDES IN
GROUNDWATER AT FORMER LANDFILL SITES AND THE EXPLOSIVE ORDNANCE
DISPOSAL (EOD) RANGE, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) reviewed the above-referenced document, dated July 2001. This technical memorandum presents the results of a more definitive evaluation conducted at the former landfill sites (Installation Restoration Programs (IRP) Sites 2, 3, 5 and 17) and the EOD range (IRP Site 1). The objective of the evaluation was to verify conclusions from previous investigations regarding radionuclides in groundwater.

DTSC has no comments on the document. DTSC also forwarded the document to the California Department of Health Services (DHS) for review. DHS comments are enclosed. These comments were forwarded by DHS directly to the Department of the Navy on July 27, 2001.

Please contact me at (714) 484-5395 if you have any questions.

Sincerely,

Triss M. Chesney, P.E.
Remedial Project Manager

Enclosure

cc: See next page

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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Mr. Dean Gould
August 13, 2001
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Department of Health Services

M e m o r a n d u m

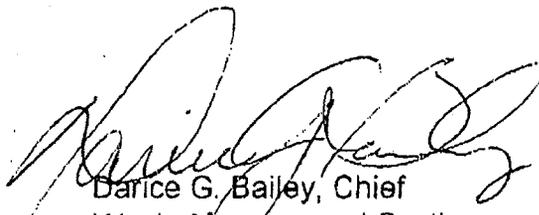
Date: July 27, 2001

To: Ms. Triss Chesney
Department of Toxic Substances Control (DTSC), Region 4
Office of Military Facilities
5796 Corporate Avenue
Cypress, California 90630

From: Environmental Management Branch
P.O. Box 942732
601 North 7th Street, MS 396
Sacramento, California 94234-7320
(916) 445-0498

Subject: *Review of the Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station (MCAS) El Toro, California, July 2001.*

Attached are The Department of Health Services' (DHS) comments on the subject report. This review was performed by Mr. Kurt Jackson and Ms. Deirdre Dement, Associate Health Physicists, 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
Waste Management Section

cc: Mr. Dean Gould
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Department of Health Services

Review of Draft Technical Memorandum, Phase II Evaluation of Radionuclides in
Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station, El
Toro, California

July 27, 2001

DTSC Resource Planning Form # 579

The following comments are in response to the request from Ms. Triss Chesney of the Department of Toxic Substances Control to review the *Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station (MCAS) El Toro*, dated July 2001. This document was reviewed by Mr. Kurt Jackson and Ms. Deirdre Dement of DHS.

General Comments:

1. The subject document is well written and includes appropriate information. Based on this report DHS concurs that the uranium found in the groundwater at this time is naturally occurring.

Specific Comments:

1. Executive summary, Page i, recommends reevaluation of CERCLA Groundwater Monitoring Plan with respect to the need for radionuclide monitoring. The conclusions on Page 5-1 also suggest possible revision of the record-of-decision based on this study. It should be noted that the current lack of radionuclide contamination in groundwater does not speak to the radiological content of landfills, which has not yet reached the groundwater. Therefore the need or lack of need for radionuclide groundwater monitoring in the future will depend on the knowledge of what went into the landfills and what was used at the site more than it will depend on the results of this study.
2. Page 1-7, Lines 1 and 2, should read Environmental Management Branch instead of Radiological Services Branch.
3. Page 2-4 first paragraph under General Chemistry does not mention whether stable isotope samples were filtered. However, on Page 3-1 it is stated that the stable isotope samples were unfiltered, but this seems to be contradicted by the sentence above that, which indicates that the samples collected for uranium analysis (which were filtered) were also measured for stable isotopes. Clarification of these statements is needed. The basis for selecting filtered or unfiltered samples for stable isotope analysis should also be stated on Page 2-4.
4. The footnotes on Table 3-2, Page 3-5 should specify the conversion between tritium units (TU) and pCi per liter. Tritium Units are not a unit familiar to most individuals

DHS' Review of Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station, El Toro, California.

July 27, 2001

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who may be reviewing the document and drinking water standards are stated in units of pCi per liter. The conversion factor is given on Page vii under the acronyms and abbreviations section.