

CITY OF LAKE FOREST



January 6, 2000

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Dean Gould
BRAC Environmental Coordinator
P.O. Box 51718
Irvine, California 92619-1718

Subject: MCAS El Toro -- Draft Final Historical Radiological Assessment

Dear Mr. Gould:

Thank you for the opportunity to offer comments on the Draft Final Historical Radiological Assessment for MCAS El Toro. The City believes that reliance on presumptive remedies for Landfill Sites 2 and 17, with potential radionuclide contamination, is inadequate. Because of these significant concerns, we respectfully request additional investigation be performed.

We believe the following must be addressed:

1. Section 7.3.1, regarding soil exposure, the comparisons to background may be a mischaracterization. According to the Multi-Agency Radiation Survey and Site Investigations Manual, the background samples are to be collected in non-impacted areas. Because of the historic operations at MCAS El Toro, we recommend that suitable numbers of off-site soil samples be used in determining the background radionuclide concentrations.
2. Section 7.3.2, regarding surface water pathways, should be revised to account for radionuclide contamination in the vicinity of Landfill Site 2. Furthermore, although the report indicates that there is no documented disposal of radioactive materials in any of the landfills, the report fails to comment on the radium painted gauge that was recently discovered on Landfill Site 2.

Please feel free to call me at 461-3481 if you have any questions.

Very truly yours,
CITY OF LAKE FOREST

Robert L. Woodings, P.E.
Director of Public Works/City Engineer

C: City Manager