

State of California

Department of Health Services

**Memorandum**M60050.000658  
MCAS EL TORO  
SSIC #5090.3

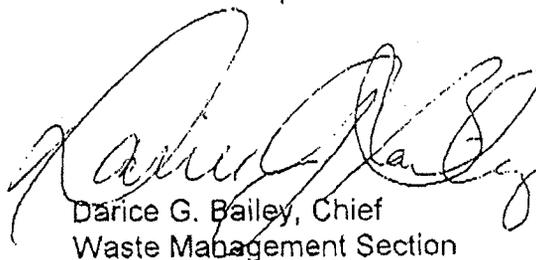
Date: October 19, 2000

To: Ms. Triss Chesney  
Department of Toxic Substances Control (DTSC), Region 4  
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From: Environmental Management Branch  
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Subject: Review of Draft Project Work Plan Marine Corps Air Station, El Toro, California,  
Revision 1, dated August 4, 2000 (SITE 1)

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  
Waste Management Section

cc: Mr. Dean Gould ✓  
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**received**  
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Department of Health Services  
(DHS)  
Review of Draft Project Work Plan Marine Corps Air Station, El Toro, California,  
Revision 1, dated August 4, 2000

October 19, 2000  
DTSC Resource Planning Form # 510

The following comments and questions are in response to the request from Ms. Triss Chesney of the Department of Toxic Substances Control (DTSC) to review the *Draft Project Work Plan Marine Corps Air Station (MCAS), El Toro, California, Revision 1*, dated August 4, 2000.

General Comments:

1. The list of sites for this plan includes areas where discrete sources may have been used, incinerated or disposed. The proposed surveys may be appropriate to meet an objective of finding discrete sources or elevated contamination levels on or near the surface. Lower concentrations that would exceed the release criteria and thus be considered contamination may not be detected by the methods proposed. The difficulties in surveying and sampling the landfills may prohibit an unrestricted release of these sites.

Specific Comments:

1. Page 4-5, Section 4.9: If it is important to prevent replacement of contaminated soil in the trenches, then screening the soil with a sodium iodide detector may not be sensitive enough to make this determination. It should be noted that the suggested survey would only be capable of detecting gamma radiation and could only detect radium-226 (Ra-226) discrete sources of approximately one microcurie through 18" of soil. Surveys using sodium iodide detectors would not be sufficient to determine that there was no radioactive contamination or that the cover is free of radioactive material above background. (See Specific Comment 2.)
2. Page 6-3, Section 6.2.21: It is not clear what is meant by the phrase "free of radioactive material" in the statement, "excavated material will consist of clean cover, which will be returned back into the trenches if it is free of radioactive material."