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State of California

Department of Health Services

Memorandum

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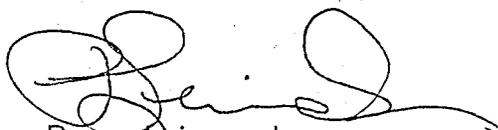
Date: September 6, 2006

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

From: California Department of Health Services (DHS)
Environmental Management Branch
1616 Capitol Avenue, 2nd Floor
MS 7405
P.O. Box 997413
Sacramento, California 95899-7413

Subject: Review of the Navy's August 2006 Responses to CDHS' April 2006 comments and *Draft Final Radiological Release Report, IRP Sites 3 and 5 (including APHO 46), Anomaly Area 3, and Building 244, Marine Corps Air Station El Toro, California, dated August 2006*

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) 449-5675.



Penny Leinwander
Senior Health Physicist

California Department of Health Services (CDHS) Review

Activity: Review of the Navy's August 2006 Response to CDHS' April 2006 comments RE: *Draft Final Radiological Release Report, IRP Sites 3 and 5 (including APHO 46), Anomaly Area 3, and Building 244, Marine Corps Air Station El Toro, California*, dated August 2006
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General Comments:

1. CDHS still does not agree that the "high density" scan of soil can adequately characterize a site to a depth of 18 inches. It may be able to verify that discrete sources greater than 1.6 microcuries or 1,600,000 picocuries are present, but that does not lead to the conclusion that there is no contamination within that 18 inches of soil.

Your clarification that the test radiation source radium-226 (Ra-226) was 1.6 microcuries rather than the 1 microcurie source that has been stated in the past is noted. This only suggests that under test conditions the 3-inch by 3-inch shielded sodium iodide scintillation probes were capable of detecting a 1.6 microcurie (1,600,000 picocuries) source. Other surveys have not shown a good correlation between surface readings and subsurface soil samples. Any contamination found with this survey only confirms that the area is contaminated.

2. As stated earlier, the Navy is not requesting unrestricted radiological release from CDHS for landfill Sites 3 and 5.
3. As stated in the CDHS' General Comments dated April 18, 2006, historical documentation appears to show that burial of radiological contamination at Anomaly Area 3 or APHO 46 was unlikely. Based on this information, CDHS concurs that these two areas may be released for unrestricted use. CDHS will provide a separate memorandum stating this.
4. CDHS' has reviewed the survey data taken at Building 244. If there are no changes in this data, CDHS will plan to perform a confirmation survey of this building to release it for unrestricted use.
5. If CDHS does not comment on an item, classification, or method presented in a document, that does not imply that CDHS agrees with all the information provided or that policy changes will not affect those documents.