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Comment on West Los Angeles VA Medical Center; Preliminary Draft Final Master Plan--Public Comment Period; FR Doc No: 2015-26945; Collins, Michael

This is a Comment on the **Department of Veterans Affairs (VA)** Notice: **Preliminary Draft Final Master Plan: West Los Angeles VA Medical Center; FR Doc No: 2015-26945**

Comment Period Closed
Dec 8 2015, at 11:59 PM ET

For related information, [Open Docket Folder](#)

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Submitter Information

Submitter Name:

Michael Collins

Comment

December 7, 2015

From: Michael Collins, EnviroReporter.com
<contact@enviroreporter.com>

To: Department of Veteran Affairs

Re:
The Department of Veterans Affairs (VA) Notice: Preliminary Draft Final Master Plan: West Los Angeles VA Medical Center; FR Doc No: 2015-26945

Dear VA,

We have reported on the West LA VA (VA) biomedical nuclear and chemical dump since 2006 for the newspapers Los Angeles CityBeat and LA Weekly as well as our online news organization EnviroReporter.com. That reporting is available at <http://www.enviroreporter.com/vanukedumpinvestigation>.

The above noted Preliminary Draft Final Master Plan for the West LA Medical Center (Master Plan) appears to have altogether ignored the fact that there is a significant biomedical nuclear and chemical dump (dump) on VA property, property slated for development.

A 2010 \$1 million West LA VA study of the dump prompted by

EnviroReporter.com, former City of Los Angeles Councilmember Bill Rosendahl and the Brentwood community, shows high radiation in the groundwater and concerning contaminants in the dump area's soil and soil vapor.

Most importantly, whatever the high levels of high tritium, radium-226 and bismuth-214 found in the dump's groundwater are, the VA-funded testing proved that there is a biomedical nuclear dump on VA property.

This VA report you have failed to include in the Master Plan says "The 'Arroyo/Eastern Canyon' has been previously identified as a burial area for former medical waste, including animal carcasses, medical isotope waste in radiological scintillation vials and other miscellaneous medical debris."

Yet the Master Plan doesn't even mention this report or the dump. That such important information was left out of such a lengthy document suggests incompetence or a cover-up of the dump. Whatever the reason, it is of great concern to us that you have ignored this VA information.

Building in the dump area before thoroughly excavating it could lead to uncontrolled radiological and chemical releases to the environment, threaten the health and safety of workers during excavation and construction and of Veterans living in this part of the VA in the future. Impacted dust from excavation and construction could impact the public in apartments and condominiums along the dump on Barrington Avenue if excavation of the contamination doesn't take place first.

That 2010 VA study is called
INITIAL VOC & RADIOLOGICAL SUBSURFACE
INVESTIGATION REPORT
Veterans Administration - Greater Los Angeles Healthcare
System (VA-GLAHS)

The study is readily available online at a VA web address:

Summary:

<http://www.losangeles.va.gov/documents/GLA-Phase-II-Study-12-10-10-Exec-Sum.pdf>

Volume 1:

<http://www.losangeles.va.gov/documents/GLA-Phase-II-Study-12-10-10-VOLUME-1.pdf>

Volume 2:

<http://www.losangeles.va.gov/documents/GLA-Phase-II-Study-12-10-10-VOLUME-2.pdf>

Volume 3:

<http://www.losangeles.va.gov/documents/GLA-Phase-II-Study-12-10-10-VOLUME-3.pdf>

On PDF page 205 out of 889 of the Master Plan refers to the dump area as part of a "Potential Expansion Neighborhood. On

page 225 it's called "Parkland" and appears that trees have been planted, a walkway added and other signs of land design elements. On page 233, it's called the "Macarthur Neighborhood. And on page 337, the dump area is split three ways as if its existence was unknown to the planners.

On PDF page 6 out of 156 of Volume 1 of the 2010 VA dump report, it reads "In groundwater samples obtained in December 2009 and August 2010, elevated levels of Tritium and Radium were detected. Since Radium was not included in the VA's disposal records covering canyon disposal, its presence is very likely from natural sources. However, Tritium was reported as the most common nuclide disposed of in the canyon and its presence with an average activity levels of up to 26.8 pCi/L can only be due to that disposal." [our emphasis]

The highest reading of tritium (H-3 or "heavy water") was 52.5 picocuries per liter (pCi/l) in the dump according to the VA report. The same report says that 10 pCi/l is normal background and this exceeds that by over 5 times.

"Tritium was detected in every plant transpiration water sample collected at levels ranging from 51.0 pCi/L to 130.8 pCi/L," the 2010 VA dump report reads. "The water collected from the leaves of the plants occurs from transpiration of groundwater by plants whose roots tap the groundwater. Transpired plant water was only analyzed for Tritium, which is both the most prevalent radionuclide reported in the disposal area, the most mobile and most likely to migrate along groundwater pathways...."

PLEASE SEE ATTACHED PDF FOR COMPLETE COMMENT

Attachments (1)

EnviroReporter comments West LA VA Draft Master Plan

View Attachment:

