



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CALIFORNIA 92132-5190

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NOV 21 1989

From: Commanding Officer, Southwest Division, Naval Facilities Engineering Command

To: Commanding General, Marine Corps Air Station El Toro, CA 92709

Subj: EVALUATION OF ADDITIONAL INSTALLATION RESTORATION PROGRAM SITES

Ref: (a) MCAS El Toro ltr 6280/LJG of 15 Aug 89
(b) California Regional Water Quality Control Board (CRWQCB), Santa Ana Region/ MCAS El Toro ltr of 23 Jun 89
(c) PHONCON (Code 1811) Mr. Sandza/MCAS El Toro LTJG Rehor of 20 Oct 89
(d) EPA Hazard Ranking System score sheets, MCAS El Toro

Encl: (1) Draft response ltr to CRWQCB, Santa Ana Region

1. Reference (a) requested review and preparation of a draft response to reference (b). Reference (b) requested the addition of several sites to the Site Inspection (SI) Plan of Action.

2. As discussed in reference (c), we anticipate that MCAS El Toro will be listed final on the National Priority List in the coming weeks, triggering the six-month time limit for Remedial Investigation/Feasibility Study (RI/FS) initiation imposed by the Comprehensive Environmental Response, Compensation, and Liability Act. After discussing reference (d) with our Environmental Counsel, we have concluded that the 17 original Initial Assessment Study sites are subject to this time limitation. This statutory requirement will not allow adequate time to implement the existing SI Plan of Action prior to RI/FS scoping. For this reason, we plan to proceed directly into the RI/FS phase, incorporating the implementation of work which would have been completed under the SI phase.

3. The preparation of the RI/FS Work Plan is currently scheduled to be initiated next month. This new work plan will include all of the work proposed in the SI Plan of Action, but will be considerably more extensive in its field investigation of the sites. Technical Review Committee review and regulatory agency approval of the RI/FS Work Plan will be required.

4. The sites listed in reference (b) will be addressed following a different timetable from the other sites. Before deciding on whether or not to move into the SI and RI/FS phases, further evaluation, including record searches and site visits, is needed for each site. We propose to complete this evaluation as a separate Preliminary Assessment (PA). Those sites that warrant progressing into the SI phase, and are eligible for Defense Environmental Restoration Account funding, will be identified in the PA. Our evaluations of these sites will require a different, slower timetable than the original sites listed on the NPL. We will schedule the PA for mid FY90.

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5. Enclosure (1) is provided as a recommended response to the CRWQCB.
6. Point of contact is Mr. Walter Sandza, (AUTOVON 522-2449).

ALAN B. FREEMAN
By direction

Blind copy to:
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Writer: W. Sandza, 1811, X22449
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Kurt V. Berchtold
Supervising Engineer
California Regional Water Quality Control Board
Santa Ana Region
6809 Indiana Avenue, Suite 200
Riverside, CA 92506

Dear Mr. Berchtold:

This letter is in response to your letter of June 23, 1989 requesting that several sites be added to the Site Inspection (SI) Plan of Action for MCAS El Toro.

We anticipate that MCAS El Toro will be listed final on the National Priority List (NPL) in the very near future, triggering the six month time limit for Remedial Investigation/Feasibility (RI/FS) initiation imposed by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This schedule will not allow adequate time to complete the proposed SI work prior to RI/FS Work Plan preparation. For this reason, we plan to proceed directly into the RI/FS phase at those sites included in the existing SI Plan of Action at MCAS El Toro, and incorporate the implementation of work which would have been completed under the SI phase.

The preparation of the RI/FS Work Plan is currently scheduled to be initiated next month. This new work plan will include all of the work proposed in the SI Plan of Action, but will be considerably more extensive in its field investigation of the original SI sites.

The additional sites will be addressed following a different timetable from the other sites. Before deciding on whether or not to move into the SI and RI/FS phases, further evaluation, including record searches and site visits, is needed for each site. We propose to complete this evaluation as a separate Preliminary Assessment (PA). Those sites that warrant progressing into the SI phase will be identified in the PA. Our evaluations of these sites will require a different, slower timetable than the original sites in the SI Plan of Action. We will schedule the PA for mid-FY 90. Once completed, the PA will be provided to you for review.

Be assured that we will continue to coordinate with the Board and will keep you informed of any new developments. If you have any further questions or comments, please contact LTJG Rehor at (619)726-2821 or Mr. Walter Sandza of Southwest Division, Naval Facilities Engineering Command at (619)532-2449.

Sincerely,

cc: Southwest Division, Naval Facilities Engineering Command, Code 18

Enclosure (1)