



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

Cert No. P115386711
5090
Ser 06CC.DG/014
January 04, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Glenn R. Kistner
U.S. Environmental Protection Agency
Region IX, (SFD 8-2)
Hazardous Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105-3901

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU) -3
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Kistner:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3 (Site 1) requires a revised milestone deliverable date for the draft Remedial Investigation (RI). Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This extension request is made pursuant to Section 9.2 (g) of the FFA.

On July 1, 1999, our office received a letter from DTSC stating that all operations should cease at the EOD Range. On July 2, 1999, the base was formally closed. As a result of the July 1, 1999 letter, and its potential impact on both the IR program as well as parcel reuse, additional correspondence was exchanged, which ultimately led to meetings. A series of meetings have taken place between DON, DTSC and most recently, the FBI as the future operator of the EOD Training Facility. At the November 3, 1999 meeting, a number of issues were identified by both the DON and DTSC. The Navy continues to maintain that the facility was used for training purposes, as supported by the documentation presented to DTSC at the meeting. This meeting resulted in the two parties agreeing to pursue the drafting of a MOA to reflect their respective differing positions. Following the meeting, Marine Corps Counsel prepared a Draft MOA, and forwarded it for DTSC Counsel review. On December 10, 1999, another meeting took place at DTSC, primarily with the FBI. The DON was not represented at this meeting. At the December 10, 1999 meeting, it was decided that the FBI would supply to DTSC their training requirements for review, and that the interested parties would work together to identify a portion of the site that could be used by the FBI for continued training. Marine Corps Counsel received from DTSC Counsel

Cert No. P115386712
5090
Ser 06CC.DG/014
January 04, 2000

a revised draft of the MOA via email on December 21, 1999. In this email, a target date was set of March 31, 2000 for the completion of negotiations on the MOA.

Due to the continued use of the facility by the Marine Corps very close to the date of base closure, and the ensuing negotiations on past and future operations as detailed previously, an extension to the current FFA will be required. In support of property transfer, a site-specific environmental baseline survey is currently underway at Site 1. In addition, the Historical Radiological Assessment effort is underway, with a Final Radiological Release Report date of December 2000. As the schedule could be significantly impacted by the results of the MOA negotiation, and the mentioned on-going studies, we propose the following milestones for the continued CERCLA effort at IR Site 1. The start date below of April 14, 2000 allows 2 weeks after the target completion for the negotiations to incorporate the terms into our process:

Development of the RI Strategy/ Draft Workplan: 4/14/00-10/13/00 (this extended timeframe will allow HRA information to be incorporated, provided the Site 1 information can be expedited, and no significant radiological problems are identified on-site)

Draft Final RI Workplan (review/comment/issue): 10/14/00-3/14/01

RI Fieldwork: 3/15/01-6/15/01

Draft RI: 6/16/01-10/17/01

Draft RI Review: 10/18/01-12/19/01

Draft Final RI: 12/20/01-2/20/02

RI Concurrence: 2/21/02-3/20/02

Draft FS: 3/20/02-6/19/02

Draft Proposed Plan: 11/20/02-01/20/03

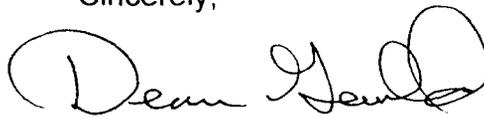
Draft Record Of Decision: 8/21/03-11/20/03

We are requesting a 21-month extension for the Site 1 draft RI submittal. The draft RI milestone is proposed for October 17, 2001 from January 4, 2000. Due to the structure of the FFA deliverables and agency review process, follow-on FFA milestone dates are similarly impacted. The draft Feasibility Study shifts from September 11, 2000, to June 19, 2002. The draft Proposed Plan shifts from April 18, 2001, to January 20, 2003. The draft Record of Decision shifts from December 14, 2001, to November 20, 2003.

Cert No. P115386712
5090
Ser 06CC.DG/014
January 4, 2000

We are certain that with the cooperation of the BCT, strategies can be developed to greatly expedite the above timeline in support of our mission identified in past BCP's. Please call me at (619) 532-4155 if you have any questions, or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Dean Gould". The signature is written in a cursive style with a large, looping initial "D".

DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to: (w/encl)

Mr. John Scandura, Cal EPA, DTSC Region 4

Ms. Patricia Hannon, Cal RWQCB, Santa Ana Region



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

Cert No. P115386252
5090
Ser 06CC.DG/014
January 04, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. John Scandura
California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Chief Office of Military Facilities
Southern California Operations
5796 Corporate Avenue
Cypress, CA 90630

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU) -3
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Scandura:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3 (Site 1) requires a revised milestone deliverable date for the draft Remedial Investigation (RI). Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This extension request is made pursuant to Section 9.2 (g) of the FFA.

On July 1, 1999, our office received a letter from DTSC stating that all operations should cease at the EOD Range. On July 2, 1999, the base was formally closed. As a result of the July 1, 1999 letter, and its potential impact on both the IR program as well as parcel reuse, additional correspondence was exchanged, which ultimately led to meetings. A series of meetings have taken place between DON, DTSC and most recently, the FBI as the future operator of the EOD Training Facility. At the November 3, 1999 meeting, a number of issues were identified by both the DON and DTSC. The Navy continues to maintain that the facility was used for training purposes, as supported by the documentation presented to DTSC at the meeting. This meeting resulted in the two parties agreeing to pursue the drafting of a MOA to reflect their respective differing positions. Following the meeting, Marine Corps Counsel prepared a Draft MOA, and forwarded it for DTSC Counsel review. On December 10, 1999, another meeting took place at DTSC, primarily with the FBI. The DON was not represented at this meeting. At the December 10, 1999 meeting, it was decided that the FBI would supply to DTSC their training requirements for review, and that the interested parties would work together to identify a portion of the site that could be used by the FBI for continued training. Marine Corps Counsel received from DTSC Counsel

Cert No. P115386252
5090
Ser 06CC.DG/014
January 04, 2000

a revised draft of the MOA via email on December 21, 1999. In this email, a target date was set of March 31, 2000 for the completion of negotiations on the MOA.

Due to the continued use of the facility by the Marine Corps very close to the date of base closure, and the ensuing negotiations on past and future operations as detailed previously, an extension to the current FFA will be required. In support of property transfer, a site-specific environmental baseline survey is currently underway at Site 1. In addition, the Historical Radiological Assessment effort is underway, with a Final Radiological Release Report date of December 2000. As the schedule could be significantly impacted by the results of the MOA negotiation, and the mentioned on-going studies, we propose the following milestones for the continued CERCLA effort at IR Site 1. The start date below of April 14, 2000 allows 2 weeks after the target completion for the negotiations to incorporate the terms into our process:

Development of the RI Strategy/ Draft Workplan: 4/14/00-10/13/00 (this extended timeframe will allow HRA information to be incorporated, provided the Site 1 information can be expedited, and no significant radiological problems are identified on-site)

Draft Final RI Workplan (review/comment/issue): 10/14/00-3/14/01

RI Fieldwork: 3/15/01-6/15/01

Draft RI: 6/16/01-10/17/01

Draft RI Review: 10/18/01-12/19/01

Draft Final RI: 12/20/01-2/20/02

RI Concurrence: 2/21/02-3/20/02

Draft FS: 3/20/02-6/19/02

Draft Proposed Plan: 11/20/02-01/20/03

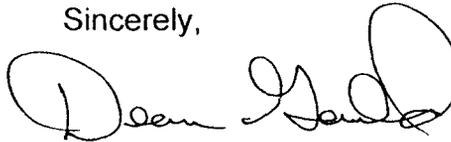
Draft Record Of Decision: 8/21/03-11/20/03

We are requesting a 21-month extension for the Site 1 draft RI submittal. The draft RI milestone is proposed for October 17, 2001 from January 4, 2000. Due to the structure of the FFA deliverables and agency review process, follow-on FFA milestone dates are similarly impacted. The draft Feasibility Study shifts from September 11, 2000, to June 19, 2002. The draft Proposed Plan shifts from April 18, 2001, to January 20, 2003. The draft Record of Decision shifts from December 14, 2001, to November 20, 2003.

Cert No. P115386252
5090
Ser 06CC.DG/014
January 4, 2000

We are certain that with the cooperation of the BCT, strategies can be developed to greatly expedite the above timeline in support of our mission identified in past BCP's. Please call me at (619) 532-4155 if you have any questions, or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Gould". The signature is fluid and cursive, with a large loop at the end.

DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to: (w/encl)
Mr. Glenn Kistner, U.S. EPA Region IX
Ms. Patricia Hannon, Cal RWQCB, Santa Ana Region



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

Cert No. P115386712
5090
Ser 06CC.DG/014
January 04, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Patricia Hannon
California Regional Water Quality Control Board
Santa Ana Region
Remedial Project Manager
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU) -3
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Hannon:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3 (Site 1) requires a revised milestone deliverable date for the draft Remedial Investigation (RI). Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This extension request is made pursuant to Section 9.2 (g) of the FFA.

On July 1, 1999, our office received a letter from DTSC stating that all operations should cease at the EOD Range. On July 2, 1999, the base was formally closed. As a result of the July 1, 1999 letter, and its potential impact on both the IR program as well as parcel reuse, additional correspondence was exchanged, which ultimately led to meetings. A series of meetings have taken place between DON, DTSC and most recently, the FBI as the future operator of the EOD Training Facility. At the November 3, 1999 meeting, a number of issues were identified by both the DON and DTSC. The Navy continues to maintain that the facility was used for training purposes, as supported by the documentation presented to DTSC at the meeting. This meeting resulted in the two parties agreeing to pursue the drafting of a MOA to reflect their respective differing positions. Following the meeting, Marine Corps Counsel prepared a Draft MOA, and forwarded it for DTSC Counsel review. On December 10, 1999, another meeting took place at DTSC, primarily with the FBI. The DON was not represented at this meeting. At the December 10, 1999 meeting, it was decided that the FBI would supply to DTSC their training requirements for review, and that the interested parties would work together to identify a portion of the site that could be used by the FBI for continued training. Marine Corps Counsel received from DTSC Counsel

Cert No. P115386712
5090
Ser 06CC.DG/014
January 04, 2000

a revised draft of the MOA via email on December 21, 1999. In this email, a target date was set of March 31, 2000 for the completion of negotiations on the MOA.

Due to the continued use of the facility by the Marine Corps very close to the date of base closure, and the ensuing negotiations on past and future operations as detailed previously, an extension to the current FFA will be required. In support of property transfer, a site-specific environmental baseline survey is currently underway at Site 1. In addition, the Historical Radiological Assessment effort is underway, with a Final Radiological Release Report date of December 2000. As the schedule could be significantly impacted by the results of the MOA negotiation, and the mentioned on-going studies, we propose the following milestones for the continued CERCLA effort at IR Site 1. The start date below of April 14, 2000 allows 2 weeks after the target completion for the negotiations to incorporate the terms into our process:

Development of the RI Strategy/ Draft Workplan: 4/14/00-10/13/00 (this extended timeframe will allow HRA information to be incorporated, provided the Site 1 information can be expedited, and no significant radiological problems are identified on-site)

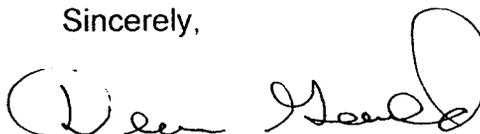
Draft Final RI Workplan (review/comment/issue): 10/14/00-3/14/01
RI Fieldwork: 3/15/01-6/15/01
Draft RI: 6/16/01-10/17/01
Draft RI Review: 10/18/01-12/19/01
Draft Final RI: 12/20/01-2/20/02
RI Concurrence: 2/21/02-3/20/02
Draft FS: 3/20/02-6/19/02
Draft Proposed Plan: 11/20/02-01/20/03
Draft Record Of Decision: 8/21/03-11/20/03

We are requesting a 21-month extension for the Site 1 draft RI submittal. The draft RI milestone is proposed for October 17, 2001 from January 4, 2000. Due to the structure of the FFA deliverables and agency review process, follow-on FFA milestone dates are similarly impacted. The draft Feasibility Study shifts from September 11, 2000, to June 19, 2002. The draft Proposed Plan shifts from April 18, 2001, to January 20, 2003. The draft Record of Decision shifts from December 14, 2001, to November 20, 2003.

Cert No. P115386712
5090
Ser 06CC.DG/014
January 4, 2000

We are certain that with the cooperation of the BCT, strategies can be developed to greatly expedite the above timeline in support of our mission identified in past BCP's. Please call me at (619) 532-4155 if you have any questions, or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean Gould". The signature is written in a cursive style with a large, looped initial "D".

DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to: (w/encl)
Mr. Glenn R. Kistner, U.S. EPA, Region IX
Mr. John Scandura, Cal EPA DOTSC, Region 4

APPENDIX A

MCAS El Toro Schedule

<u>Operable Unit (OU)-1: Site 18</u>	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	9 Nov 93	No Change	
Draft Remedial Investigation	30 Dec 94	No Change	
Draft Interim Action Feasibility Study	15 Oct 95	No Change	
Draft Final Interim Action Feasibility Study	9 Aug 96	No Change	
*Agency Approval of Draft Final	11 Oct 96	No Change	
*Response to Regulatory Draft Final Comments	15 Jan 98	No Change	
Draft Proposed Plan	18 Dec 95	No Change	
*re-Draft Proposed Plan	24 Nov 98	No Change	
3 rd Draft Proposed Plan	28 Jan 00	No Change	
Draft Final Proposed Plan	per FFA	No Change	
Draft Record of Decision	27 Sep 00	No Change	
 <u>OU-2A: Site 24 (Vadose Zone)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Proposed Plan	11 Mar 97	No Change	
Draft Record of Decision	1 Jul 97	No Change	
Draft Final Record of Decision	24 Sep 97	No Change	
Draft Remedial Design/Remedial Action Work Plan	6 Jan 98	No Change	
Draft Final Remedial Design	11 Aug 98	No Change	
Draft Construction Quality Assurance Plan	11 Aug 98	No Change	
Draft Construction Quality Control Plan	11 Aug 98	No Change	
Draft Contingency Plan	11 Aug 98	No Change	
Draft Project Closeout Report	22 Apr 02	No Change	
 <u>OU-2A: Site 24 (Groundwater)</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Feb 96	No Change	
Draft Feasibility Study	9 Aug 96	No Change	
Draft Final Feasibility Study	5 Dec 97	No Change	
*Agency Approval of Draft Final	23 Mar 98	No Change	
Draft Proposed Plan	24 Nov 98	No Change	
2 nd Draft Proposed Plan	28 Jan 00	No Change	
Draft Final Proposed Plan	per FFA	No Change	
Draft Record of Decision	27 Sep 00	No Change	
 <u>OU-2B: Sites 2 & 17</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Mar 96	No Change	
Draft Final Remedial Investigation	6 Sep 96	No Change	
Draft Feasibility Study	6 Sep 96	No Change	
Draft Final Feasibility Study	18 Mar 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	

APPENDIX A

MCAS El Toro Schedule

<u>OU-2B: Sites 2 & 17 (continued)</u>	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	4 Nov 98	No Change	
Draft Final Record of Decision	17 Jun 99	No Change	
 <u>OU-2C: Sites 3 & 5</u>			
Phase I Tech Memo	7 May 93	No Change	
Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
Draft Remedial Investigation	20 Apr 96	No Change	
Draft Final Remedial Investigation	8 Oct 96	No Change	
Draft Feasibility Study	8 Oct 96	No Change	
Draft Final Feasibility Study	13 Feb 97	No Change	
Draft Proposed Plan	18 Sep 97	No Change	
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	15 Mar 99	No Change	
Draft Final Record of Decision	17 Mar 00	No Change	
 <u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 & 22 and OU-2A: Site 25</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	20 Mar 97	N/A	
Draft Proposed Plan	15 Apr 97	No Change	
Draft Record of Decision	21 Aug 97	No Change	
 <u>OU-3: Sites 8, 11, & 12</u>			
Draft Remedial Investigation (included Site 16)	20 Nov 96	No Change	
Draft Feasibility Study (FS)	10 Jul 97	No Change	
Draft Final Feasibility Study	13 Jan 98	No Change	
*Agency Approval of Draft Final	22 Jun 98	No Change	
Draft Proposed Plan	28 Jul 98	No Change	
Draft Final Proposed Plan	17 Mar 99	No Change	
Draft Record of Decision	7 Jun 99	No Change	
 <u>OU-3: Sites 7 & 14</u>			
Draft Remedial Investigation	7 Sep 99	No Change	
Draft Feasibility Study	N/A	No Change	
Draft Proposed Plan	9 Mar 00	No Change	
Draft Record of Decision	12 Oct 00	No Change	
 <u>OU-3: Site 16</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	18 Feb 00	No Change	
Draft Proposed Plan	25 Sep 00	No Change	
Draft Record of Decision	30 Apr 01	No Change	
 <u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	17 Oct 01	+21 Months
Draft Feasibility Study	11 Sep 00	19 Jun 02	+21 Months
Draft Proposed Plan	18 Apr 01	20 Jan 03	+21 Months
Draft Record of Decision	14 Dec 01	20 Nov 03	+23 Months

This schedule reflects current/proposed FFA milestones. * Not an enforceable FFA deliverable.

SOUTHWESTNAVFACENGCOM
Code 5BME.LMH
1220 Pacific Highway
San Diego, CA 92132
Telephone: (619) 532-4162/Fax: (619) 532-4160

File: areltoro.doc

TRANSMITTAL

Date: 5 January 2000

From: Lynn Marie Hornecker
MCAS El Toro



To: Diane Silva
Code 01LS.DS

Subj: **CERCLA Administrative Record Materials**
Marine Corps Air Station, El Toro

Installation: Marine Corps Air Station, El Toro

UIC Number: M60050

Document Title/Subject: Federal Facility Agreement Schedule, Operable Unit (OU) – 3, Site 1,
Marine Corps Air Station, El Toro

Author/Affiliation: Dean Gould, Southwest Division, Naval Facilities Engineering Command

Recipient: Glenn Kistner
United States Environmental Protection Agency

Record Date: 4 January 2000

Approximate Number of Pages: 5

EPA Category: 01.1

Sites: Site 1

Key Words: EOD, FFA, RI

Contract: N/A

CTO Number: N/A

M60050.000276
MCAS EL TORO
SSIC #5090.3

**RESPONSES TO THE FEDERAL FACILITY
AGREEMENT APPENDIX A SCHEDULE
CHANGE IS ENTERED INTO THE DATABASE
AND FILED UNDER ADMINISTRATIVE
RECORDS NO. M60050.000269 &
M60050.000415**