



# Department of Toxic Substances Control

Edwin F. Lowry, Director  
5796 Corporate Avenue  
Cypress, California 90630

Gray Davis  
Governor

July 13, 1999

Justin H. Hickox  
Secretary for  
Environmental  
Protection

Mr. Joseph Joyce  
BRAC Environmental Coordinator  
U.S. Marine Corps Air Station - El Toro  
P. O. Box 51718  
Irvine, California 92619-1718

Dear Mr. Joyce:

**REQUEST FOR EXTENSIONS TO THE FEDERAL FACILITY AGREEMENT (FFA)  
SCHEDULE, OPERABLE UNIT (OU) 1 AND OU-2A GROUNDWATER, MARINE CORPS  
AIR STATION (MCAS) EI TORO**

On July 13, 1999, representatives from the Department of Toxic Substances Control (DTSC) and Department of Navy (DON) participated in a conference call to resolve the June 29, 1999 FFA extension request. The DON informed us that extension is needed because Irvine Ranch Water District (IRWD) is considering significant changes in the design and purposes of the Irvine Desalter Project (IDP). The additional time is needed for the water districts to perform more groundwater modeling; identify new ARARs; resolve potential conflicts of interest; complete new alternative cost estimates, prepare a Feasibility Study Addendum; and resume discussions with the water districts on Settlement issues. We discussed opportunities to expedite the tasks, review time and submittal of documents to reduce the DON requested 7-month extension for the submittal of a draft Proposed Plan (PP) for OU 1 and OU-2A (Sites 18 and 24) Groundwater Remediation and a 14-month extension for the submittal of a draft Record of Decision (ROD). This letter is to clarify DTSC's position regarding the need to expedite the submittal and review time of documents leading to the submittal of the ROD.

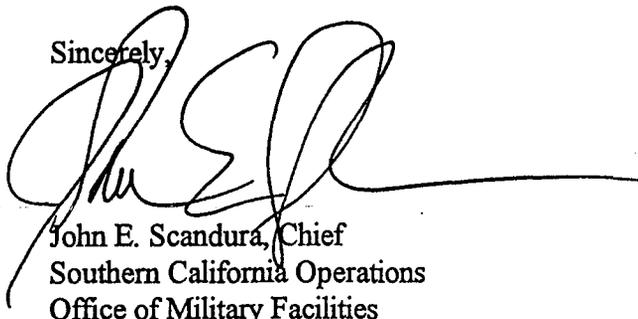
DTSC believes the draft PP should be submitted by December 31, 1999, which is 30 days earlier than what the DON had proposed. To meet this earlier deadline, DTSC suggests the Navy submit the draft Feasibility Addendum two weeks earlier than October 15, 1999. The negotiations between DON and the water districts could start earlier and conclude before December 3, 1999. Another opportunity to expedite the submittal of PP if the DON would spend less time preparing the draft PP. Instead of the current schedule of 8 weeks to prepare the draft PP, the DON can produce the document in a much shorter time.

DTSC believes the draft ROD should be submitted by August 28, 2000. DTSC believes this could be accomplished by shortening the regulatory agency comment period on the draft PP from 60 days to 45 days. Also, the DON would shorten their time for submittal of draft final PP from 60 days to 45 days.

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I hope this letter clarifies DTSC's position regarding the need to expedite the project and how it can be achieved. If you have any questions, please call Mr. Tayseer Mahmoud, Remedial Project Manager, at (714) 484-5418.

Sincerely,



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Office of Military Facilities

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