

**JOINT LETTER**

1994 MAR 18 PM 2: 20

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March 11, 1994

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**MARINE CORPS AIR STATION (MCAS) EL TORO  
SUBJECT: SCHEDULE**

The U.S. Environmental Protection Agency (USEPA) and the California Environmental Protection Agency (Cal-EPA) are taking this opportunity to raise several concerns about the schedule for MCAS El Toro. We hope that the Navy will take the steps necessary to resolve these issues and we look forward to discussing these matters further at the next Remedial Project Managers (RPM) Meeting proposed for March 23-24 (?), 1994. Please contact us to confirm the meeting date(s), time and location. The concerns involve the following schedule items.

**1) OU-2 and -3 Schedule**

According to the revised Federal Facilities Agreement (FFA) schedule, Phase II Remedial Investigation (RI) fieldwork was to begin March 8, 1994. We understand that this milestone date was a target date and thus, not

enforceable. We are also aware that the BRAC Cleanup Team (BCT) has been discussing revisions to the schedule for OUs-2 and -3; it is apparent that the schedule will be significantly delayed. However, to date, the Navy has not requested a schedule extension, despite numerous requests to do so from USEPA.

Due to a change in the submittal dates for the draft *BRAC Cleanup Plan (BCP)*, a review and comment period for the regulatory agencies has been eliminated. Apparently the *BCP* will include a schedule for OUs-2 and -3 that is inconsistent with any agreement dates. It is our understanding that the *BCP*, with the inconsistent schedule, will be submitted to Marine Corps Headquarters by March 21, 1994.

We hereby request that the Navy, in accordance with Section 9 of the FFA, immediately request an amendment to the current FFA schedule. Furthermore, we request that the Navy arrange a meeting with Mr. James Pawlisch and Ms. Julie Anderson to address the schedule changes as well as any unresolved conflict of interest issues stemming from the change from Clean I to Clean II.

**2) Soil Gas Survey Schedule**

The soil gas survey was originally scheduled for Fall, 1993. Sensing delays, we sent a letter, dated November 1, 1993, requesting that the Navy conduct a soil gas survey in a timely manner to avoid delays and so that the results could be used in defining the scope of work for the Phase II RI investigation. To date, the Navy has not responded to our letter.

We understand that the soil gas survey contract task order (CTO) was awarded recently, but with additional delays. The additional delays in the final award of the CTO have apparently caused the soil gas survey schedule to slip by approximately two more weeks. It is crucial that the soil gas survey be completed within a schedule that allows for making adjustments to Phase II RI investigation strategies, at least for Sites 24 and 25 and other sites within their boundaries. The current schedule developed by the BCT members requires the submittal of a revised Phase II RI work plan for Sites 1 through 22 by mid-August 1994 and for Sites 24 and 25 by mid-September 1994. We are concerned that the soil gas survey delays could further impact the schedule for OUs-2 and -3.

**3) OU-1 Schedule**

In a February 1994 RPM meeting, the BCT members discussed the schedule for OU-1 and reached a consensus that the Record of Decision (ROD) would be completed by March 1995. Subsequently, we have learned that the Navy is considering revising this schedule so that the ROD would be completed,

apparently, in June 1995. We understand that the actual FFA milestone date is December 29, 1995. However, this latest change does represent a significant delay from the original schedule proposed by the Navy of December 1994. During the RPM meeting, we understood that the importance of an accelerated schedule, including the March 1995 date, was to allow for the timely construction and operation of both the Orange County Water District's Desalter Project as well as likely MCAS El Toro on-Station extraction wells.

Furthermore, we are concerned that the delay for the groundwater modelling meeting (of approximately one month) may ultimately affect the OU-1 schedule, specifically, the draft Feasibility Study (FS) submittal. We are interested in reviewing the OU-1 schedule with you as soon as possible.

**4) Transition From Clean I to Clean II (for OUs-2 and -3)**

We are concerned about the progress of the transition from Clean I to Clean II for OUs-2 and -3. The current schedule developed by the BCT members indicates that the revision of the draft Phase II RI work plan will begin in May 1994. It is imperative that the new contractor begins "coming up to speed" in preparation for the work plan revision. We hope that the transition will occur smoothly and without additional delays. We are interested in discussing the necessary transition steps with you as soon as possible.

**5) Communications**

While not specifically a schedule issue, we are concerned that there is a lack of communication between the Navy and regulatory agencies, especially at such a critical time in the project. The Navy must make it a priority to return telephone calls and respond to correspondence from the regulatory agencies. We request that the Navy re-establish the weekly conference calls as one means of improving communication.

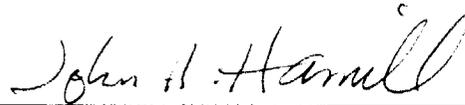
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If you have any questions concerning these matters, please contact us at our

Mr. Raines/Mr. Piszkin  
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respective telephone numbers listed below.

Sincerely,



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cc: Commanding General, USMCAS El Toro