



## Department of Toxic Substances Control



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January 25, 2001

Mr. Dean Gould  
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Base Realignment and Closure  
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### FEDERAL FACILITY AGREEMENT (FFA) SCHEDULE FOR OPERABLE UNIT (OU)-3, INSTALLATION RESTORATION PROGRAM (IRP) SITE 16, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Gould:

The Department of Toxic Substances Control (DTSC) received your letter dated January 17, 2001 requesting an extension of deadlines for Site 16 as set forth in Appendix A of the FFA for MCAS El Toro. The extension request is made pursuant to Section 9.2 (g) of the FFA.

As indicated in your letter and associated enclosures, an 18-week extension is needed to submit both the draft Proposed Plan (PP) and draft Record of Decision (ROD) for Site 16. The letter requests that the submittal date for the draft PP change from January 17, 2001 to May 23, 2001 and the submittal date for the draft ROD change from July 6, 2001 to November 9, 2001.

DTSC understands that the schedule extension for Site 16 is needed to reflect the additional time needed for installation of the wells for the multi-phase extraction (MPE) pilot study and the extended operation of the system due to its apparent effectiveness. The effectiveness of the pilot study will likely result in significant modifications to the draft final Feasibility Study (FS) that will require an extended review period.

According to the extension request, the pilot study has been extended and modified to optimized source area removal. As a result, the Department of the Navy (DON) is hopeful that the source area will be adequately addressed by the pilot study. In order to accomplish this, DTSC understands that the DON intends to negotiate agreeable soil

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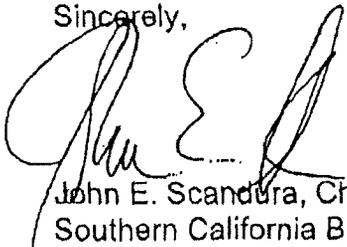
gas threshold levels for consideration as "clean" for soil prior to finalization of the FS. Further, the results of the MPE pilot study and any determinations will be presented in a technical memorandum. As a result, the DON anticipates a change in focus in the draft final FS. This will, in turn, lead to modification to the draft PP and draft ROD which will center primarily on groundwater.

If the DON proceeds with the current plan to address the source area, in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) §300.430(f)(3)(c), the RI/FS and all supporting analysis and information (such as the technical memorandum) used to support the proposed remedy selection for Site 16 are subject to a minimum 30-day public comment period.

Although the DON hopes to adequately address the source area through the pilot study, DTSC recommends that alternatives for soil be included in the draft final FS to be carried through the PP and ROD in the event that rebound of soil vapor is detected. Additionally, the December letter includes the development of soil gas threshold levels based on the model from Site 24 and the information provided in the draft FS that utilize a mixing zone concept. On April 18, 2000, DTSC forwarded comments for the draft FS that requested justification and references for the applicability of the mixing zone concept, the basis of assumptions, and the representativeness of the calculations. To date, DTSC has not received a sufficient response and, as such, does not agree with the proposed method for calculating soil gas threshold levels.

Although there are a few issues to be discussed, DTSC supports the modification to the MPE pilot study in an effort to expedite remediation of the source area. As a result, DTSC agrees that good cause exists for the extension. As such, DTSC grants your request for changes to the FFA schedule. If you have any questions, please contact Ms. Triss Chesney, Remedial Project Manager, at (714) 484-5395.

Sincerely,



John E. Scandura, Chief  
Southern California Branch  
Office of Military Facilities

cc: Ms. Polin Modanlou  
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