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25 September, 2000

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 16), MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Kistner:

This purpose of this letter is to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3, Site 16, (Crash Crew Pit #2), requires revised milestone deliverable dates for the Draft Proposed Plan and Draft Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable dates for both the Draft Proposed Plan and Draft Record of Decision by approximately 16 and 10 weeks, respectively, and is made pursuant to Section 9.2 (g) of the FFA.

As the BCT is aware and has been involved in, the objective of the pilot testing at Site 16 is to collect data to evaluate the applicability of implementing a full-scale MPE system at Site 16. This data may then be used to refine the alternatives presented in the Draft Feasibility Study OU-3 Site 16 (Draft FS). In order to complete the Draft Final FS, the data collected during the pilot testing must be evaluated so that the alternatives presented in the Draft FS can be refined. Additional time was needed, however, to resolve all regulatory comments received on the "Draft Phase II Work Plan - MPE Pilot Study, IRP Site 16, MCAS El Toro", prior to moving forward with the study itself. Difficult drilling conditions encountered during well installation activities at Site 16 further exacerbated the time issue.

Due to the events mentioned, the scheduled completion date of the pilot testing fieldwork activities is now projected to be 27 October 2000 (approximately six additional weeks). As a result of the impact on the Draft Final FS, the FFA schedule date for issuance of the Draft Proposed Plan was in turn affected. It is further expected that previously performed groundwater computer modeling and cost estimates for the alternatives presented in the Draft FS will need to be revised.

A working group meeting was recently held between the Navy and our contractor supporting these documents. Our objective was to minimize the overall schedule impact by adjusting those events within our control. As you will see in the table below, we have taken extremely aggressive measures in reducing Navy and contractor review and turn-around times. While standard BCT review/comment timeframes have not been adjusted, it is hoped that they too can find opportunities for schedule reduction.

Event	Start	Complete
Proposed Plan		
1. Issue Final WP to SWDIV/Agency		7/26/00A
2. Pilot Test	7/31/00A	10/27/00
3. Revise Draft FS Utilizing Pilot Test Results	10/29/00	12/29/00
4. SWDIV Review	01/02/01	01/09/01
5. Revise Draft Final FS Report per SWDIV comments	01/10/01	01/15/01
6. Issue to SWDIV/Agency Draft Final FS Report		01/17/01
7. Issue to SWDIV/Agencies Responses to Comments		01/17/01
Feasibility Study		
8. Prepare/Issue 1 st Working Draft Proposed Plan	7/11/00	12/13/00
9. SWDIV Review (2 weeks)	12/13/00	12/27/00
10. Incorporate comments/Issue 2 nd Working Draft PP	12/27/00	01/03/01
11. SWDIV Review (1 week)	01/03/01	01/10/01
12. Incorporate SWDIV comments (1 week)	01/10/01	01/17/01
13. Issue Draft PP (Not current FFA Date)		01/17/01
14. BCT-regulator review of Draft PP (60 days)	01/17/01	03/16/01
15. Incorp. reg. Comments (2 weeks)	03/16/01	04/02/01
16. Issue pre-Draft Final PP to SWDIV		04/02/01
17. SWDIV Review (1 week)	04/02/01	04/09/01
18. Incorp. SWDIV comments (1 week)	04/09/01	04/16/01
19. Issue Draft Final PP to BCT		04/16/01
20. Regulator rvw of Draft Final PP (assume 30 days)	04/16/01	05/16/01
21. Incorp. reg. Cmets (1 week)	05/16/01	05/23/01
22. Issue Final PP for SWDIV app.		05/23/01
23. Receive Approval/Print Proposed Plan	05/23/01	05/28/01
24. Public Comment Period (minimum 30 days)	05/30/01	06/29/01
25. Public Meeting (held mid-point of comment period)		06/13/01
Record of Decision		
26. Prepare Draft ROD	01/15/01	03/22/01
27. Issue to SWDIV for Over-the-Shoulder review		03/22/01
28. SWDIV Review (3 weeks)	03/22/01	04/17/01
29. Update AR index	03/15/01	04/17/01
30. Revise Draft ROD per SWDIV comments (3 weeks)	04/17/01	05/08/01
31. Prepare Responsiveness Summary (2 weeks)	06/29/01	07/13/01
32. Issue RS to SWDIV for over-the-shoulder review		07/13/01
33. SWDIV review of RS (2 weeks)	07/13/01	07/27/01
34. Revise RS per SWDIV comments (2 weeks)	07/27/01	08/10/01
35. Issue Draft ROD (Not current FFA Date)		07/06/01

We feel that the schedule as described above, presents the most aggressive approach we can take, and still ensure that top quality documents are produced that are protective of human health and the environment, as well as in support of our chartered vision. The deliverable date for the Draft Proposed Plan will shift from 25 Sep 00 to 17 Jan 01, and the Draft Record of Decision will be adjusted from 30 April 01, to 06 July 01. Thank you in advance for your support, and please call me at (619) 532-0784 if you have any questions, or need additional information.

Sincerely,

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, DTSC
Mr. John Broderick, Cal RWQCB, Santa Ana Region

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	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 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	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 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	15 Dec 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	17 Jan 01	+16 Weeks
Draft Record of Decision	30 Apr 01	06 Jul 01	+10 Weeks
 <u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	17 Oct 01**	
Draft Feasibility Study	11 Sep 00	19 Jun 02**	
Draft Proposed Plan	18 Apr 01	20 Jan 03**	
Draft Record of Decision	14 Dec 01	20 Nov 03**	

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable, **Have not received BCT approval