



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 75 Hawthorne Street  
 San Francisco, CA 94105

MAR 14 1995 7:31

M60050.001786  
 MCAS EL TORO  
 SSIC # 5090.3

March 9, 1995

James R. Pawlisch  
 Director, Environmental Department  
 Southwest Division  
 Naval Facilities Engineering Command  
 1220 Pacific Highway, Room 18  
 San Diego, CA 92132-5181

Re: Extension Request for MCAS El Toro

Dear Mr. Pawlisch:

I am writing in response to your letter dated December 29, 1994, received by fax on the same date, requesting extensions of the deadlines for Operable Units (OUs) 2 and 3 set forth in Appendix A of the Federal Facility Agreement (FFA) for Marine Corps Air Station (MCAS) El Toro.

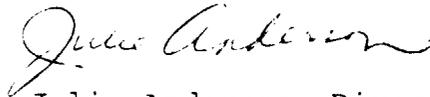
Over the past two months, the Navy, State and EPA have discussed your proposed schedule extension and have reached agreement on a new schedule, which is attached. We believe this new schedule reflects a sound approach to addressing environmental and reuse priorities and is consistent with the spirit of the Remedial Investigation/Feasibility Study deadlines established for Base Realignment and Closure (BRAC) Rounds 1 and 2 bases by the Defense Authorization Act of 1992. Existing OU1 deadlines as set forth by letter dated June 9, 1992 are unaffected by these schedule changes.

As extensions for OUs 2 and 3 have been granted on two prior occasions, June 9, 1992 and August 6, 1993, it is important that all team members make every effort to maintain these new schedules. While we acknowledge that you may incur funding shortfalls that could impact these schedules, Sections 9, 10 and 15 of the FFA provide for extensions should this occur. However, a number of other factors which are within your control have contributed to past delays (of primary concern are assignment of personnel resources and contracting) and must be closely managed to avoid future delays. It is of utmost importance that the current Navy personnel, who have been very effective in working with the BRAC Cleanup Team, be well supported by an experienced contractor team to ensure that we meet our objectives for OUs 2 and 3. In addition, the Navy, State and EPA must continue to expeditiously identify and resolve technical disagreements among the project team.

All parties to the FFA for MCAS El Toro have made a significant investment of time and effort into this project. While it is disappointing to have incurred the number of delays we have thus far on OUs 2 and 3, I believe the current team on MCAS El Toro is making significant progress towards our goals of environmental restoration and base transition. We are looking forward to signing a Record of Decision for CU1 in early 1996. You have my commitment to continue to work in partnership with you to accelerate base cleanup and reuse wherever feasible.

I have signed the attached agreement to the new schedule and request that you sign and return it to me. I will obtain signatures from the State and make copies available to all FFA parties, who should make it a part of the FFA. If you would like discuss this matter further, please call me at 415/744-2420.

Sincerely,



Julie Anderson, Director  
Federal Facilities Cleanup Office

cc: John Scandura  
Mike Adackapara  
MCAS El Toro BCT  
Larry Vitale, RWQCB  
Wayne Lee, MCAS El Toro

Enclosure

We agree to the Federal Facility Agreement schedules for Marine Corps Air Station, El Toro, as set forth in the attached Appendix A.

*Julie Anderson*

\_\_\_\_\_  
Julie Anderson  
Chief, Federal Facilities Cleanup Office  
U.S. EPA, Region 9

*3/9/95*  
\_\_\_\_\_  
Date

\_\_\_\_\_  
James R. Pawlisch  
Director, Environmental Department  
NAVFACENGCOM, SW Division  
U.S. Navy

\_\_\_\_\_  
Date

\_\_\_\_\_  
John Scandura  
Chief, Southern California Operations  
California Dept. of Toxic Substances Control

\_\_\_\_\_  
Date

\_\_\_\_\_  
Michael Adackapara  
Supervising Senior, Site Mitigation and Cleanup Unit  
California Regional Water Quality Control Board

\_\_\_\_\_  
Date

APPENDIX A

Revised Schedule  
MCAS El Toro

Deliverable or Milestone	Negotiated Completion Dates	Previously Established Completion Dates
<u>Operable Unit 1</u>		<u>Operable Unit 1</u>
Draft Longterm GWM Workplan	20-Feb-97	Phase I Tech Memo 7-May-93 Draft Phase II Workplan 9-Nov-93 Draft RI 30-Dec-94 Draft FS 23-Mar-95 Draft Proposed Plan 23-Jun-95 Draft Record of Decision 29-Dec-95
<u>Operable Unit 2A</u>		
Draft R/F/S Work Plan	N/A	
Phase I Technical Memo	N/A	
Draft Phase II Work Plan	20-Mar-95	
Start Phase II Fieldwork	20-Jul-95 *	
Draft RI Report	20-Feb-96	
Draft FS Report	20-Jun-96	
Draft Proposed Plan	20-Oct-96	
Draft Record of Decision	20-Jan-97	
<u>Operable Unit 2B</u>		
Draft R/F/S Work Plan	N/A	
Phase I Technical Memo	N/A	
Draft Phase II Work Plan	20-Mar-96	
Start Phase II Fieldwork	20-Jul-96 *	
Draft RI Report	20-Mar-96	
Draft FS Report	20-Jul-96	
Draft Proposed Plan	20-Nov-96	
Draft Record of Decision	20-Feb-97	
<u>Operable Unit 2C</u>		
Draft R/F/S Work Plan	N/A	
Phase I Technical Memo	N/A	
Draft Phase II Work Plan	20-Mar-95	
Start Phase II Fieldwork	20-Jul-96 *	
Draft RI Report	20-Apr-96	
Draft FS Report	20-Aug-96	
Draft Proposed Plan	20-Dec-96	
Draft Record of Decision	20-Mar-97	
<u>Operable Unit 3</u>		
Draft R/F/S Work Plan	N/A	
Phase I Technical Memo	N/A	
Draft Phase II Work Plan	20-Mar-95	
Start Phase II Fieldwork	20-Jul-96 *	
Draft RI Report	20-Nov-96	
Draft FS Report	20-Mar-97	
Draft Proposed Plan	20-Jul-97	
Draft Record of Decision	20-Oct-97	
<u>Sites 4 and 13</u>		
Issue Draft EE/CA	20-May-95 **	
Prepare Action Memos	20-Jun-95 **	
Issue Final Action Memos	20-Oct-95 **	
Issue Final EE/CA	20-Dec-95 **	
Start Fieldwork	20-Apr-96 **	
Phase II Workplan****	20-Mar-97	
<u>Sites 7, 11, 14, 18, 20</u>		
Issue Draft EE/CA	20-Jul-95 **	
Prepare Action Memos	20-Oct-95 **	
Issue Final Action Memos	20-Mar-96 **	
Issue Final EE/CA	20-Aug-96 **	
Start Fieldwork	20-Aug-96 **	
Phase III Workplan****	20-Jul-97	

\* These completion dates are target dates(not enforceable).

\*\* Remove: Actions not controlled by the Federal Facility Agreement.

\*\*\* Major Draft documents are staggered at least 30 days and assume a 60 day review except the Proposed Plan and ROD which assume a 30 day review.

\*\*\*\* At minimum a Technical Memorandum documenting the removal action completed, evaluating the success, and specifying the next step at the site.