



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION IX
 75 Hawthorne Street
 San Francisco, CA 94105-3801

M60050.001828
 MCAS EL TORO
 SSIC # 5090.3

OPTIONAL FORM 89 (7-90)

FAX TRANSMITTAL

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To <i>MAJ GEN DRAX WILLIAMS</i>	From <i>JULIE ANDERSON</i>
Dept./Agency	PHONE #
Fax #	Fax #
NEN 7540-01-017-7308 6089-101 GENERAL SERVICES ADMINISTRATION	

JUL 11 1994

T. E. Gunn, Captain
 CEC, U.S. Navy
 Commanding Officer
 NAVFACENGCOM
 1220 Pacific Highway
 San Diego, CA 92132-5190

Major General Drax Williams
 Commanding General
 Marine Corps Air Station
 El Toro
 Santa Ana, CA 92709-5010

Dear Sirs:

**LETTER OF CONCERN: MANAGEMENT OF MARINE CORPS AIR STATION EL TORO
 CERCLA CLEANUP INVESTIGATION**

I am writing to express my serious concern regarding on-going problems with management of the MCAS El Toro environmental cleanup. EPA initiated discussion of these problems with Navy Southwest Division managers nearly a year and a half ago. To address these concerns, the Navy recently assigned additional personnel to the project. While we are encouraged to see this additional resource investment has finally occurred, we remain discouraged that the Navy's project team continues to suffer from lack of leadership, and communication and coordination difficulties. As a result, scheduled cleanup activities have been significantly delayed and the Navy/Regulatory partnership has severely deteriorated.

The Environmental Protection Agency is committed to assisting the Marine Corps/Navy to expedite cleanup and enable rapid reuse of MCAS El Toro. To this end, we have dedicated a full time Project Manager to this effort. However, our effectiveness in the BCT is impaired by these ongoing Navy leadership and management problems. The lack of prompt resolution to these problems threatens to undermine the objectives of the President's five point plan initiative for closing bases.

The three primary problems which have led to poor performance and schedule delays and have caused a breakdown in confidence within the Base Closure Team are:

1) Continued failure by the Navy to issue contracts in a timely manner to ensure that the cleanup investigation can proceed according to schedule. The problem of timely contract award has plagued this project for the last three years and led to a formal dispute between the Navy and EPA two years ago. A specific example was the time it took the Navy to implement the soil gas survey. The soil gas survey was originally scheduled for fall 1993. The contract task order (CTO) was not issued until March 1994, and the survey was not initiated until late May 1994. This delay will directly negatively impact the schedule for OUs 2 and 3.

2) Continued failure by the Navy to respond to correspondence from the Regulatory Agencies. The Regulatory Agencies have issued four letters of concern since November 1993. (Attachments) To date, none of these has received a response.

3) Continued failure by the Navy to participate in scheduled conference calls; and continued lack of commitment by the Navy to timely schedule meetings with agendas with the Regulatory Agencies. When meetings do occur, the Navy is in many cases unprepared which leads to unfocused and unproductive results. Even phone messages to the Navy are left unresponded, with the result that communications between the Navy and the Regulators is minimal and inefficient.

We are concerned that unless these problems are addressed quickly, the enforceable schedule identified by the Federal Facilities Agreement (FFA) is in jeopardy of being further delayed, and could subject the Navy to penalties. We urge you to ensure that adequate leadership and resources are placed for the proper management of the cleanup investigation and reuse of USMCAS El Toro, a high priority closing facility.

If you would like to discuss these issues further, please don't hesitate to contact me at (415) 744-2420.

Sincerely,



Julie Anderson, Director
Federal Facility Cleanup Office

Attachments

cc: John Scandura, DTSC
Gary Stewart, RWQCB