



UNITED STATES MARINE CORPS

HEADQUARTERS MARINE CORPS AIR STATION EL TORO
PO BOX 95000
SANTA ANA CA 92709-5000

IN REPLY REFER TO:

Cert. No. P115386866
6284
1AU
30 Dec 97

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Region IX
Attn: Mr. Glenn R. Kistner
Remedial Project Manager
Hazardous Waste Management Division, (SFD 8-2)
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: Federal Facility Agreement Schedule, Marine Corps Air Station (MCAS) El Toro

Dear Mr. Kistner:

This letter is to request changes to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. The following operable units require revised milestone deliverable dates: Operable Unit (OU) -1 (Site 18), OU-2A (Site 24 groundwater), OU-2B (Sites 2 & 17), OU-2C (Sites 3 & 5), OU-3 (Sites 8, 11, & 12), OU-3 (Sites 7, 14, & 16), and OU-3 (Site 1). Enclosure (1) presents a detailed schedule of revised FFA milestones. These extension requests are made pursuant to Section 9.2 (g) of the FFA.

OU-1 (Site 18)

In 1996, the BRAC Cleanup Team (BCT) decided that it was appropriate to coordinate or combine OU-1 with the groundwater related to OU-2A (Site 24). The coordination of El Toro groundwater issues has always been in support of an anticipated joint multi-purpose groundwater project between the Department of the Navy (DoN) and Orange County Water District (OCWD).

The draft final Interim Action Remedial Investigation/Feasibility Study reports were submitted on August 9, 1996. After final review of the documents, none of the agencies stated that revisions to or a re-submittal of draft final Interim Action Remedial Investigation/Feasibility Study reports are required. In a letter dated October 10, 1996, the U.S. Environmental Protection Agency (US EPA) stated that the Draft Final Interim Action Remedial Investigation/Feasibility Study reports "...are acceptable without revision..." In a letter addressed to the Department of Toxic Substances Control (DTSC) dated October 8, 1996, the California Regional Water Quality Control Board - Santa Ana Region (CRWQCB-SAR) stated that "the IAFS [draft final Interim Action Feasibility Study] report is acceptable to the extent that it identifies feasible remedial alternatives to mitigate the regional groundwater plume." In a letter dated October 11, 1996, DTSC stated that "the documents are generally acceptable provided that the enclosed Department of Toxic Substances Control and Regional Water Quality Control Board specific comments dated October 8, 1996 are incorporated into the final RI/FS documents. The general comments should be incorporated into future OU-1 documents. The following major comments should be incorporated into the OU-1 draft final Proposed Plan and Record of Decision (ROD)."

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Once the agencies have reviewed our response to their comments on the draft final documents, we would like to discuss the most appropriate method of presenting the nine volume final Interim Action Remedial Investigation/Feasibility Study report to the public for their comment. The submittal of the response to draft final comments is not a primary milestone under our FFA. January 15, 1998, is the revised date for the submittal of the response to agency draft final comments, including those from OCWD. The extension is due mainly to illness of the Lead Remedial Project Manager who is working on all the response to comments on the OU-1 documents. The date change equates to an additional five weeks to the previous completion date.

OU-2A (Site 24 groundwater)

In a letter dated December 19, 1997, the US EPA requested additional time to review the draft final Phase II Groundwater Feasibility Study with a new agency comment submittal date of January 20, 1998. Based on this request, the draft Proposed Plan (PP) and draft Record of Decision (ROD) submittals extend to March 23, 1998, and December 29, 1998, respectively. The changes in dates equate to an additional two weeks to the current completion dates.

OU-2B (Sites 2 & 17) and OU-2C (Sites 3 & 5)

We received comments from the California Integrated Waste Management Board on the draft Proposed Plan in a letter dated November 21, 1997. According to the FFA, the draft final submittal of that document is due sixty days later. In addition, the regulatory agencies are provided thirty days to approve the draft final document. The revised completion date for the draft final Proposed Plan is January 28, 1998. With the extension of the Proposed Plan document and the inclusion of a thirty day agency approval period, there is a corresponding extension (six weeks) required for the draft ROD from April 20, 1998 to a revised date of June 2, 1998.

OU-3 (Sites 8, 11, & 12)

In a letter dated October 2, 1997, the US EPA requested additional time to review and comment on the draft Phase II Feasibility Study for these OU-3 sites. November 6, 1997 was the revised agency comment submittal date. Based on this request, the draft final Phase II Feasibility Study for these OU-3 sites is due sixty days later; the submittal date is January 13, 1998. With the two month extension for agency review of the draft FS, the draft Proposed Plan submittal is revised from February 19, 1998 to April 16, 1998, a two month extension. With the inclusion of the thirty day agency approval period for the draft final Proposed Plan and accounting for a sixty day public review and comment period, there is a corresponding extension (four months) required for the draft ROD from August 13, 1998 to a revised date of December 22, 1998.

OU-3 (Sites 7, 14, & 16)

In our October 9, 1997 BCT meeting, the team ranked OU-3 Sites 7, 14, and 16 as the lowest priority under El Toro's Installation Restoration Program. We anticipate securing funding and

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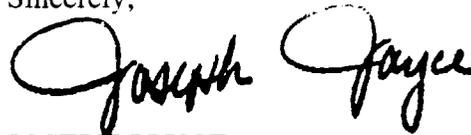
procuring contract work for these sites in early 1998. The proposed revised milestone dates for the draft Remedial Investigation (sites 7 and 14 only), Feasibility Study, Proposed Plan, and Record of Decision documents are: August 10, 1998; March 19, 1999; October 21, 1999; and May 26, 2000; respectively. The changes in dates correspond to extensions of seven months, six months, six months, and seven months, respectively.

OU-3 (Site 1)

Site 1, an explosive ordnance disposal range, is currently an active training facility at MCAS El Toro. In 1997, the BCT discussed having Site 1 managed and remediated under another environmental program, possibly the Range Rule that is currently out for review. Any proposed program change will be discussed with the BCT. Site 1 will continue to be part of an active training program up to the date of El Toro's operational closure, July 1999. Environmental investigation field efforts will not start until after July 1999. The following revised FFA submittal milestones reflect the availability of this site after operational closure. The draft Remedial Investigation, Feasibility Study, and Proposed Plan reports are all extended twenty-four months from existing milestones. The revised dates are: January 4, 2000; September 11, 2000; and April 18, 2001; respectively. A twenty-six month extension for the draft ROD includes the thirty day period for agency approval of the draft final Propose Plan and accounts for a sixty day review and comment period for the public. The revised draft ROD submittal date is December 14, 2001.

These new revised dates are both fair and reasonable. This revised schedule allows both the regulatory agencies ample document review times and the Department of the Navy to consider agency comments prior to proceeding with future submittals. If you have any questions, or need additional information, please call me at (714) 726-3470 or Andy Piszkin at (619) 532-4161.

Sincerely,



JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
the Commanding General

Encl:

(1) Appendix A FFA Schedule of Submittals

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Copy to:
John Scandura, DTSC
Larry Vitale, Santa Ana RWQCB

APPENDIX A
MCAS El Toro Schedule
(Page 1 of 2)

<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	5 Dec 97	15 Jan 98	+ 5 weeks
Draft Proposed Plan	18 Dec 95	No Change	
*re-Draft Proposed Plan	11 Mar 98	23 Mar 98	+ 2 weeks
Draft Interim Record of Decision	16 Dec 98	29 Dec 98	+ 2 weeks
 <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 May 98	No Change	
Draft Construction Quality Assurance Plan	11 May 98	No Change	
Draft Construction Quality Control Plan	11 May 98	No Change	
Draft Contingency Plan	11 May 98	No Change	
Draft Project Closeout Report	17 Jan 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	7 Jan 98	20 Jan 98	+ 2 weeks
Draft Proposed Plan	11 Mar 98	23 Mar 98	+ 2 weeks
Draft Record of Decision	16 Dec 98	29 Dec 98	+ 2 weeks
 <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	
Draft Final Proposed Plan	---	28 Jan 98	60 days post Agency comments
Draft Record of Decision	20 Apr 98	2 Jun 98	+ 6 weeks

APPENDIX A
MCAS El Toro Schedule
(Page 2 of 2)

	Current <u>Completion Dates</u>	New <u>Completion Dates</u>	<u>Change in Dates</u>
<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	60 days post Agency comments + 10 weeks
Draft Record of Decision	18 Mar 98	2 Jun 98	
<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	60 days post Agency comments + 2 months
Draft Proposed Plan	19 Feb 98	16 Apr 98	+ 2 months
Draft Record of Decision	13 Aug 98	22 Dec 98	+ 4 months
<u>OU-3: Sites 7, 14, & 16</u>			
Draft Remedial Investigation (sites 7 & 14 only)	7 Jan 98	10 Aug 98	+ 7 months
Draft Feasibility Study	14 Sep 98	19 Mar 99	+ 6 months
Draft Proposed Plan	23 Apr 99	21 Oct 99	+ 6 months
Draft Record of Decision	18 Oct 99	26 May 00	+ 7 months
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	7 Jan 98	4 Jan 00	+ 24 months
Draft Feasibility Study	14 Sep 98	11 Sep 00	+ 24 months
Draft Proposed Plan	23 Apr 99	18 Apr 01	+ 24 months
Draft Record of Decision	18 Oct 99	14 Dec 01	+ 26 months

This schedule reflects current/proposed FFA milestones and are subject to change.

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California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Attn: Mr. John Scandura
Chief Office of Military Facilities
Southern California Operations
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

RE: Federal Facility Agreement Schedule, Marine Corps Air Station (MCAS) El Toro

Dear Mr. Scandura:

This letter is to request changes to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. The following operable units require revised milestone deliverable dates: Operable Unit (OU) -1 (Site 18), OU-2A (Site 24 groundwater), OU-2B (Sites 2 & 17), OU-2C (Sites 3 & 5), OU-3 (Sites 8, 11, & 12), OU-3 (Sites 7, 14, & 16), and OU-3 (Site 1). Enclosure (1) presents a detailed schedule of revised FFA milestones. These extension requests are made pursuant to Section 9.2 (g) of the FFA.

OU-1 (Site 18)

In 1996, the BRAC Cleanup Team (BCT) decided that it was appropriate to coordinate or combine OU-1 with the groundwater related to OU-2A (Site 24). The coordination of El Toro groundwater issues has always been in support of an anticipated joint multi-purpose groundwater project between the Department of the Navy (DoN) and Orange County Water District (OCWD).

The draft final Interim Action Remedial Investigation/Feasibility Study reports were submitted on August 9, 1996. After final review of the documents, none of the agencies stated that revisions to or a re-submittal of draft final Interim Action Remedial Investigation/Feasibility Study reports are required. In a letter dated October 10, 1996, the U.S. Environmental Protection Agency (US EPA) stated that the Draft Final Interim Action Remedial Investigation/Feasibility Study reports "...are acceptable without revision..." In a letter addressed to the Department of Toxic Substances Control (DTSC) dated October 8, 1996, the California Regional Water Quality Control Board - Santa Ana Region (CRWQCB-SAR) stated that "the IAFS [draft final Interim Action Feasibility Study] report is acceptable to the extent that it identifies feasible remedial alternatives to mitigate the regional groundwater plume." In a letter dated October 11, 1996, DTSC stated that "the documents are generally acceptable provided that the enclosed Department of Toxic Substances Control and Regional Water Quality Control Board specific comments dated October 8, 1996 are incorporated into the final RI/FS documents. The general comments should be incorporated into future OU-1 documents. The following major comments should be incorporated into the OU-1 draft final Proposed Plan and Record of Decision (ROD)."

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In our October 9, 1997 BCT meeting, the team ranked OU-3 Sites 7, 14, and 16 as the lowest priority under El Toro's Installation Restoration Program. We anticipate securing funding and

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procuring contract work for these sites in early 1998. The proposed revised milestone dates for the draft Remedial Investigation (sites 7 and 14 only), Feasibility Study, Proposed Plan, and Record of Decision documents are: August 10, 1998; March 19, 1999; October 21, 1999; and May 26, 2000; respectively. The changes in dates correspond to extensions of seven months, six months, six months, and seven months, respectively.

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Sincerely,



JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
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Copy to:
Glenn R. Kistner, USEPA
Larry Vitale, Santa Ana RWQCB

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Draft Project Closeout Report	17 Jan 02	No Change	
 <u>OU-2A: Site 24 (Groundwater)</u>			
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California Regional Water Quality Control Board
Santa Ana Region
Attn: Mr. Larry Vitale
Remedial Project Manager
3737 Main Street, Suite 500
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Once the agencies have reviewed our response to their comments on the draft final documents, we would like to discuss the most appropriate method of presenting the nine volume final Interim Action Remedial Investigation/Feasibility Study report to the public for their comment. The submittal of the response to draft final comments is not a primary milestone under our FFA. January 15, 1998, is the revised date for the submittal of the response to agency draft final comments, including those from OCWD. The extension is due mainly to illness of the Lead Remedial Project Manager who is working on all the response to comments on the OU-1 documents. The date change equates to an additional five weeks to the previous completion date.

OU-2A (Site 24 groundwater)

In a letter dated December 19, 1997, the US EPA requested additional time to review the draft final Phase II Groundwater Feasibility Study with a new agency comment submittal date of January 20, 1998. Based on this request, the draft Proposed Plan (PP) and draft Record of Decision (ROD) submittals extend to March 23, 1998, and December 29, 1998, respectively. The changes in dates equate to an additional two weeks to the current completion dates.

OU-2B (Sites 2 & 17) and OU-2C (Sites 3 & 5)

We received comments from the California Integrated Waste Management Board on the draft Proposed Plan in a letter dated November 21, 1997. According to the FFA, the draft final submittal of that document is due sixty days later. In addition, the regulatory agencies are provided thirty days to approve the draft final document. The revised completion date for the draft final Proposed Plan is January 28, 1998. With the extension of the Proposed Plan document and the inclusion of a thirty day agency approval period, there is a corresponding extension (six weeks) required for the draft ROD from April 20, 1998 to a revised date of June 2, 1998.

OU-3 (Sites 8, 11, & 12)

In a letter dated October 2, 1997, the US EPA requested additional time to review and comment on the draft Phase II Feasibility Study for these OU-3 sites. November 6, 1997 was the revised agency comment submittal date. Based on this request, the draft final Phase II Feasibility Study for these OU-3 sites is due sixty days later; the submittal date is January 13, 1998. With the two month extension for agency review of the draft FS, the draft Proposed Plan submittal is revised from February 19, 1998 to April 16, 1998, a two month extension. With the inclusion of the thirty day agency approval period for the draft final Proposed Plan and accounting for a sixty day public review and comment period, there is a corresponding extension (four months) required for the draft ROD from August 13, 1998 to a revised date of December 22, 1998.

OU-3 (Sites 7, 14, & 16)

In our October 9, 1997 BCT meeting, the team ranked OU-3 Sites 7, 14, and 16 as the lowest priority under El Toro's Installation Restoration Program. We anticipate securing funding and

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procuring contract work for these sites in early 1998. The proposed revised milestone dates for the draft Remedial Investigation (sites 7 and 14 only), Feasibility Study, Proposed Plan, and Record of Decision documents are: August 10, 1998; March 19, 1999; October 21, 1999; and May 26, 2000; respectively. The changes in dates correspond to extensions of seven months, six months, six months, and seven months, respectively.

OU-3 (Site 1)

Site 1, an explosive ordnance disposal range, is currently an active training facility at MCAS El Toro. In 1997, the BCT discussed having Site 1 managed and remediated under another environmental program, possibly the Range Rule that is currently out for review. Any proposed program change will be discussed with the BCT. Site 1 will continue to be part of an active training program up to the date of El Toro's operational closure, July 1999. Environmental investigation field efforts will not start until after July 1999. The following revised FFA submittal milestones reflect the availability of this site after operational closure. The draft Remedial Investigation, Feasibility Study, and Proposed Plan reports are all extended twenty-four months from existing milestones. The revised dates are: January 4, 2000; September 11, 2000; and April 18, 2001; respectively. A twenty-six month extension for the draft ROD includes the thirty day period for agency approval of the draft final Propose Plan and accounts for a sixty day review and comment period for the public. The revised draft ROD submittal date is December 14, 2001.

These new revised dates are both fair and reasonable. This revised schedule allows both the regulatory agencies ample document review times and the Department of the Navy to consider agency comments prior to proceeding with future submittals. If you have any questions, or need additional information, please call me at (714) 726-3470 or Andy Piszkin at (619) 532-4161.

Sincerely,



JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
the Commanding General

Encl:

(1) Appendix A FFA Schedule of Submittals

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Copy to:
Glenn R. Kistner, USEPA
John Scandura, DTSC

APPENDIX A
MCAS El Toro Schedule
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<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	5 Dec 97	15 Jan 98	+ 5 weeks
Draft Proposed Plan	18 Dec 95	No Change	
*re-Draft Proposed Plan	11 Mar 98	23 Mar 98	+ 2 weeks
Draft Interim Record of Decision	16 Dec 98	29 Dec 98	+ 2 weeks
 <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 May 98	No Change	
Draft Construction Quality Assurance Plan	11 May 98	No Change	
Draft Construction Quality Control Plan	11 May 98	No Change	
Draft Contingency Plan	11 May 98	No Change	
Draft Project Closeout Report	17 Jan 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	7 Jan 98	20 Jan 98	+ 2 weeks
Draft Proposed Plan	11 Mar 98	23 Mar 98	+ 2 weeks
Draft Record of Decision	16 Dec 98	29 Dec 98	+ 2 weeks
 <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	
Draft Final Proposed Plan	---	28 Jan 98	60 days post Agency comments
Draft Record of Decision	20 Apr 98	2 Jun 98	+ 6 weeks

APPENDIX A
MCAS El Toro Schedule
(Page 2 of 2)

	Current Completion Dates	New Completion Dates	Change in Dates
<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	60 days post Agency comments + 10 weeks
Draft Record of Decision	18 Mar 98	2 Jun 98	
<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	60 days post Agency comments + 2 months
Draft Proposed Plan	19 Feb 98	16 Apr 98	
Draft Record of Decision	13 Aug 98	22 Dec 98	+ 4 months
<u>OU-3: Sites 7, 14, & 16</u>			
Draft Remedial Investigation (sites 7 & 14 only)	7 Jan 98	10 Aug 98	+ 7 months
Draft Feasibility Study	14 Sep 98	19 Mar 99	+ 6 months
Draft Proposed Plan	23 Apr 99	21 Oct 99	+ 6 months
Draft Record of Decision	18 Oct 99	26 May 00	+ 7 months
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	7 Jan 98	4 Jan 00	+ 24 months
Draft Feasibility Study	14 Sep 98	11 Sep 00	+ 24 months
Draft Proposed Plan	23 Apr 99	18 Apr 01	+ 24 months
Draft Record of Decision	18 Oct 99	14 Dec 01	+ 26 months

This schedule reflects current/proposed FFA milestones and are subject to change.

* Not an enforceable FFA deliverable.