



UNITED STATES MARINE CORPS

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

M60050.002406
MCAS EL TORO
SSIC #5090.3

IN REPLY REFER TO:

Cert. No. P115386425
6284
1AU
29 Apr 99

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Attn: Mr. John Scandura
Chief Office of Military Facilities
Southern California Operations
5796 Corporate Avenue
Cypress, CA 90630

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. Operable Unit (OU) -1 (site 18) and OU-2A (site 24) require a revised milestone deliverable date for the draft final Proposed Plan. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This extension request is made pursuant to Section 9.2 (g) of the FFA.

The United States of America, Orange County Water District (OCWD) and Irvine Ranch Water District (IRWD) very recently resolved all issues regarding the form, substance, and language of a formal Settlement Agreement that will incorporate the Irvine Desalter Project (IDP) into the proposed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedy for the OU-1/2A groundwater.

The Department of the Navy (DON) has recently learned that the IRWD is considering significant changes in the design and purposes of the IDP. The proposed changes, as I presently understand them, appear to affect the technical basis of the preferred alternative presented in the draft Proposed Plan submitted on November 24, 1998.

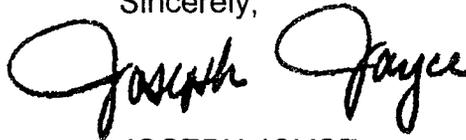
If the end use of the OU-1/2A groundwater should be changed to irrigation, as contemplated by IRWD, this would change the contemplated CERCLA remedy and may well change the associated regulatory standards and treatment requirements that support that remedy. Such changes may require a revision of the CERCLA Feasibility Study to fully evaluate these regulatory cleanup standards and associated cost issues. This may cause extensive delays in both the CERCLA remedy selection process as well as settlement resolution if history can be our guide.

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Due to these recent setbacks at this eleventh hour and after years of negotiations and working through the CERCLA remedy selection process, we request an initial one-month extension to the draft final Proposed Plan submittal. This small extension is contingent upon our ability to remain on track with our proposed remedy and come to consensus in negotiations with OCWD and IRWD. No other OU-1/2A submittals are impacted by this request. The proposed new date would change from May 1, 1999, to June 1, 1999.

This new contingent date is reasonable given the position recently expressed by IRWD. We foresee submitting an OU-1/2A draft final Proposed Plan once a settlement agreement with OCWD and IRWD has been concluded. We will keep you posted on our progress to resolve this complex situation with IRWD. Please call me at (949) 726-3470 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink that reads "Joseph Joyce". The signature is written in a cursive, flowing style.

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

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to:
Glenn R. Kistner, USEPA
Patricia Hannon, Santa Ana RWQCB



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California Regional Water Quality Control Board
Santa Ana Region
Attn: Ms. Patricia Hannon
Remedial Project Manager
3737 Main Street, Suite 500
Riverside, CA 92501-3339

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

Dear Ms. Hannon:

This letter is to request changes to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -1 (site 18) and OU-2A (site 24) require a revised milestone deliverable date for the draft final Proposed Plan. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This extension request is made pursuant to Section 9.2 (g) of the FFA.

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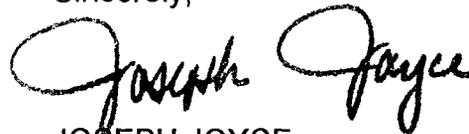
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Sincerely,



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

Enclosure: 1. Appendix A FFA Schedule of Submittals

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



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PO BOX 95000
SANTA ANA CA 92709-5000

IN REPLY REFER TO:

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29 Apr 99

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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:

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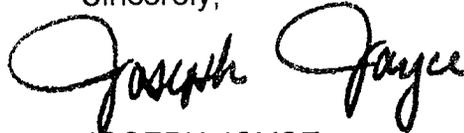
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JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
the Commanding General

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to:
John Scandura, DTSC
Patricia Hannon, Santa Ana RWQCB

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	
Draft Final Proposed Plan	1 May 99	1 Jun 99	+1 month
Draft Interim Record of Decision	2 Sep 99	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	
Draft Final Proposed Plan	1 May 99	1 Jun 99	+1 month
Draft Interim Record of Decision	2 Sep 99	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	
Draft Final Proposed Plan	28 Jan 98	No Change	
Draft Record of Decision	4 Nov 98	No Change	
Draft Final Record of Decision	27 May 99	No Change	

APPENDIX A

MCAS El Toro Schedule

	Current <u>Completion Dates</u>	New <u>Completion Dates</u>	Change in <u>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	No Change	
Draft Record of Decision	15 Mar 99	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, & 16</u>			
Draft Remedial Investigation (sites 7 & 14 only)	29 Jul 99	No Change	
Draft Feasibility Study	19 Oct 99	No Change	
Draft Proposed Plan	24 May 00	No Change	
Draft Record of Decision	29 Dec 00	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	No Change	
Draft Feasibility Study	11 Sep 00	No Change	
Draft Proposed Plan	18 Apr 01	No Change	
Draft Record of Decision	14 Dec 01	No Change	

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

* Not an enforceable FFA deliverable.