



DEPARTMENT OF THE NAVY  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
1220 PACIFIC HIGHWAY  
SAN DIEGO, CA 92132-5190

M60050.002429  
MCAS EL TORO  
SSIC #5090.3

5090  
Ser 06CC.DG/0521  
May 15, 2001

Ms. Nicole Moutoux  
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)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Moutoux:

This letter is submitted to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-2C (Sites 3 & 5) requires a revised milestone deliverable date for the Draft Final Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestone incorporated. This request will extend the deliverable date by 6 months, and is made pursuant to Section 9.2 (g) of the FFA.

In the 15 December 2000 FFA extension request that was mutually agreed upon, several items were discussed in order to try and minimize the time extension needed. These strategies still apply, along with additional nuances, which need to be addressed at this time. The BCT should be in receipt of a May 2, 2001 letter from SOUTHWESTDIV to the U.S. Fish and Wildlife Service (USFWS). This letter details the many complex issues involved with the radiological survey effort to be performed at landfills 2 & 17, in the context of natural resources. Coordination with the USFWS for sites 1, 2, and 17 was the last significant hurdle to overcome prior to commencing the radiological survey effort for the various sites. With the letter sent and coordination continuing with the USFWS, we are comfortable in beginning (11 June 2001) the radiological survey, while the natural resource issues are finalized. As a result, we plan to once again put Sites 3&5 at the top of the survey list, as all site preparations for them have been completed, and USFWS coordination is not required at these sites.

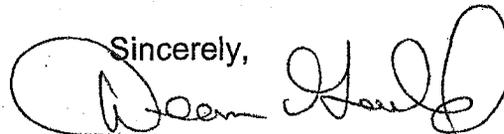
During the time in which the survey is being performed, we will also be proceeding with properly addressing Anomaly Area 3 and APHO 46, in the DRAFT Final ROD. These sites have been discussed on a number of occasions with the BCT, and the time afforded for the radiological survey to be completed, provides the previously unforeseen benefit of being able to adequately address these two locations of concern within the context of Sites 3&5.

As also previously discussed with the BCT, we plan to forward data from the radiological survey as it becomes available, in order to expedite the overall review and ROD issuance process. Given this additional review time of the radiological survey

data, we feel it reasonable to issue the Draft Final ROD for Sites 3&5 concurrent with the Draft Release Report (DRR) for MCAS El Toro. Both documents would have a 30-day review period. While a "Draft Final ROD", we feel a 30 day review period is appropriate in this instance given; the time elapsed since the issuance of the original Draft, the time needed to review the incorporation of the results of the DRR, and time to review how Anomaly Area 3 and APHO 46 are being addressed. With this commitment in place, the following schedule is proposed for OU-2C:

Radiological Survey Commences	11 Jun 01
Radiological Survey Complete	14 Sep 01
Issue MCAS El Toro DRR	14 Nov 01
Issuance of Draft Final ROD	14 Nov 01

As a result of the various issues described, we request a 6-month extension to submit the Draft Final ROD for OU-2C. This schedule is based upon the receipt of favorable results from the radiological survey. The proposed date for submitting a new Final ROD would change from 15 May 2001 to 14 November 2001. 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  
Ms. Patricia Hannon, 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	
3 <sup>rd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	15 May 01	28 Nov 01**	+6 Mos, 2 Wks
 <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 <sup>nd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	15 May 01	28 Nov 01**	+6 Mos, 2 Wks
 <u>OU-2B: Sites 2 &amp; 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

	Current Completion Dates	New Completion Dates	Change in Dates
<u>OU-2B: Sites 2 &amp; 17 (continued)</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 &amp; 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 May 01	14 Nov 01	+6 Months
<u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 &amp; 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, &amp; 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 &amp; 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	22 Nov 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	23 May 01	No Change	
Draft Record of Decision	09 Nov 01	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	19 Feb 02	No Change	
Draft Feasibility Study	07 Dec 02	No Change	
Draft Proposed Plan	19 Mar 03	No Change	
Draft Record of Decision	26 Aug 03	No Change	

This schedule reflects current/proposed FFA milestones.

\* Not an enforceable FFA deliverable

\*\* Justification provided under separate cover