



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

M60050.002729
MCAS EL TORO
SSIC #5090.3

5090
Ser 5BME.JJ/0368
July 19, 1999

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

RE: Federal Facility Agreement Schedule, Operable Unit (OU) -1 and OU-2A
Groundwater, Marine Corps Air Station (MCAS) El Toro

Dear Mr. Scandura:

The purpose of this letter is to address the Federal Facility Agreement (FFA) schedule changes proposed in your July 13, 1999 letter. You believe the development and submittal of the draft Proposed Plan (PP) should be reduced by one month with an additional month reduction for submitting the draft Record of Decision (ROD).

As discussed in our conference call on July 13, 1999, there are many significant actions that need to be performed by not only the Department of the Navy (DON) and the Department of Justice (DOJ), but also the Irvine Ranch Water District (IRWD), the Orange County Water District (OCWD), and the regulatory agencies in order for DON to develop and submit a quality draft groundwater PP. While we continue to agree that good cause still exists for submitting the draft PP on January 28, 2000 rather than on December 28, 1999, we also agree with you that one month can be cut from the draft groundwater ROD submittal from October 27, 2000, to September 27, 2000 if we work together and shorten both the regulatory agency review time on the draft PP to 45 days and DON's production of the draft final PP to 45 days. This new approach must be agreed to by the other parties of the FFA since both the US Environmental Protection Agency (USEPA) and the Santa Ana Regional Water Quality Control Board (RWQCB) have already approved the current submittal schedule proposed by DON on June 29, 1999, as being appropriate and supported with good cause.

The DON considers as a compromise solution to our FFA schedule differences the submittal of the draft groundwater PP on January 28, 2000 and the draft groundwater ROD on September 27, 2000. We consider these dates fair and reasonable given the ongoing complexity and public sensitivity of this project; the coordination of settlement agreement negotiations with the CERCLA process; our team's workload; and the winter holiday season.

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I again thank you in advance for your support for this compromise solution for our FFA groundwater draft PP and draft ROD submittals. We will continue to keep you posted on our progress to resolve this complex situation with IRWD and OCWD. Please call me at (619) 532-4157 if you have any questions or need additional information.

Sincerely,



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

Enclosure: 1. Appendix A FFA Schedule of Submittals

Copy to:

Mr. Glenn R. Kistner, USEPA, Region IX

Ms. Patricia Hannon, Cal RWQCB, Santa Ana Region

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 rd Draft Proposed Plan	N/A	28 Jan 00	+ 7 months
Draft Final Proposed Plan	1 Jul 99	per FFA	
Draft Interim Record of Decision	2 Sep 99	27 Sep 00	+13 months
 <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 nd Draft Proposed Plan	N/A	28 Jan 00	+ 7 months
Draft Final Proposed Plan	1 Jul 99	per FFA	
Draft Interim Record of Decision	2 Sep 99	27 Sep 00	+13 months
 <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	

APPENDIX A MCAS El Toro Schedule

	Current	New	Change in
	<u>Completion Dates</u>	<u>Completion Dates</u>	<u>Dates</u>
<u>OU-2B: Sites 2 & 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 & 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.