



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

February 21, 2002

Mr. Dean Gould

Base Realignment and Closure
Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
1220 Pacific Highway
San Diego, CA 92132-5190

Re: FFA Schedule Extension Request for Sites 3 and 5, Marine Corps Air Station, El Toro,
dated February 15, 2002

Dear Mr. Gould:

EPA has received your request for an extension to the FFA schedule for submittal of the draft final ROD for Sites 3 and 5 from February 15, 2002 to October 11, 2002.

We understand that the reasons for the delay in submittal are due to delays in Navy review of the Draft Radiological Release Report as well as the need to obtain results from the Removal Site Evaluation for Anomaly Area 3. While we are supportive of the extension, we have several concerns about the process and schedule for Sites 3 and 5 that we believe should be discussed by the BCT before we can concur on the request as the Navy has presented it.

First, the Navy is planning to incorporate significant new information into the draft final ROD and to share information with the regulators during the process. We believe that it would make more sense to submit a revised draft ROD due to the amount of new information that will be provided. This is also more in line with the procedures set forth in the FFA, in that draft final documents should be documents in which all major issues have been addressed. Our understanding of the FFA (see sections 7.7(f) and 7.9) is that if there are issues that are to be resolved at the draft final phase, the parties are essentially in dispute.

Second, given that the draft final ROD (or revised draft ROD) will have much more information than what was presented in the proposed plan and associated public meeting, EPA believes that some additional form of public participation should occur. We would like to discuss this in the context of the schedule to ensure that the 8 months requested is in fact the appropriate amount of time to complete the process.

We look forward to discussing these issues as a team. If you have any questions, please call me at (415) 972-3012.

Sincerely,

Nicole Moutoux

Nicole Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Triss Chesney, DTSC
Patricia Hannon, RWQCB
Jerry Werner, RAB Community Co-Chair
Polin Modanlou, MCAS El Toro Local Redevelopment Authority
