



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1230 COLUMBIA STREET, SUITE 1100
SAN DIEGO, CALIFORNIA 92101

M60050_003268
MCAS EL TORO
SSIC NO. 5090.3.B

IN REPLY REFER TO:

5090
Ser BPMOW/0012
October 15, 2004

Mr. Richard Muza
Remedial Project Manager
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St (Mail Code STD-8-2)
San Francisco, CA 94105

Mr. Tayseer Mahmoud
Remedial Project Manager
California Department of Toxic Substances Control
Office of Military Facilities
5796 Corporate Ave.
Cypress, CA 90630

Mr. John Broderick
Remedial Project Manager
California Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Fellow Federal Facility Agreement (FFA) Representatives:

**SUBJECT: FEDERAL FACILITY AGREEMENT EXTENSION REQUEST, OPERABLE
UNIT (OU)-1 and OU-2A, INSTALLATION RESTORATION PROGRAM (IRP)
SITES 18 AND 24, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO,
CALIFORNIA**

This letter is submitted to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-1 (Site 18 Regional Volatile Organic Compound [VOC] Groundwater Plume) and OU-2A (Site 24 VOC Source Area) require revised milestone deliverable dates for the completion of three post Record of Decision (ROD) draft primary documents as follows: Site 24 Final Remedial Design, Site 18 Preliminary Remedial Design (90%), and Site 18 Final Remedial Design. This request, made pursuant to Section 9.2 (d) of the FFA, will extend the deliverable date for the Site 24 Final Remedial Design by 48 calendar days, the Site 18 Preliminary Remedial Design (90%) by 94 calendar days, and the Site 18 Final Remedial Design by 84 calendar days.

Upon finalization of the ROD for OU-1 and OU-2A, the Settlement Agreement between the United States, Orange County Water District (OCWD), and Irvine Ranch Water District (IRWD) was enacted. As such, under the Settlement Agreement, the IRWD and OCWD are required to prepare all documentation that addresses the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Components of the Irvine Desalter Project (IDP) as specified in the ROD. Therefore, the post ROD deliverables were separated into the following two components: Shallow Groundwater Unit (SGU) – Site 24, and IDP – Site 18.

The FFA deliverable date was October 26, 2004 for the Site 24 Final Remedial Design, October 15, 2004 for the Site 18 Preliminary Remedial Design (90%), and December 15, 2004 for the Site 18 Final Remedial Design.

In a letter dated June 29, 2004, IRWD has proposed revisions to the CERCLA Component of the Modified IDP (CCMI). The proposed CCMI revisions require amendments to the Settlement Agreement, specifically revisions to CCMI component descriptions in the text of the agreement and Appendix 4 of the agreement, and revisions to the IDP map in Appendix 5 of the agreement. The amendments to the Settlement Agreement require approvals by the Navy, United States Department of Justice, IRWD, and OCWD before proceeding with revisions to and issuance of the formal remedial design submittals. To account for the timetable of securing the necessary approvals on the Settlement Agreement amendments, the Navy proposes to extend the deliverable date for the Site 24 Final Remedial Design from October 26, 2004, to December 13, 2004, the Site 18 Preliminary Remedial Design (90%) from October 15, 2004, to January 17, 2005, and the Site 18 Final Remedial Design from December 15, 2004 to March 9, 2005. These proposed schedule changes are reflected in the enclosed OU-1 and OU-2A Groundwater Remedy Schedule.

For Site 18, IRWD has been working with the Navy and preparing an informal 60% Supplemental Design Memorandum to propose the key design modifications to the IDP 60% Design Submittal (an informal FFA supporting document). These proposed design revisions include the following: (1) locating the Principal Aquifer extraction well ET-2 at existing water production well TIC-113, (2) locating the VOC treatment facility for SGU water at a property adjacent to MCAS El Toro instead of at the Central Treatment Plant (CTP), and (3) locating the VOC treatment facility for Principal Aquifer water near well ET-1. The Navy proposes to discuss these revisions in detail during the upcoming Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting on October 21, 2004.

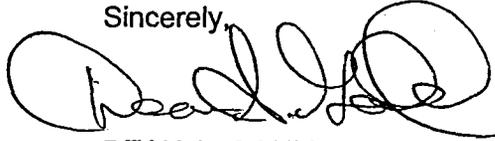
This extension request for SGU and IDP primary FFA deliverables is necessary to account for the additional work and time associated with resolving the design and Settlement Agreement issues discussed above. These activities are acceptable causes for extensions per the FFA, Section 9. The specific language in the FFA used as the principal justification for this extension request is:

Section 9.2 (d): A delay caused, or which is likely to be caused, by an extension (including without limitation an extension under subsection 7.7) in regard to another timetable and deadline or schedule.

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Thank you in advance for your cooperation and support. Given the nature of the proposed changes, we anticipate your concurrence with our request. Should you have questions or need additional information, please contact Mr. Karnig Ohannessian, Remedial Project Manager, at (619) 532-0796 or me at (619) 532-0765.

Sincerely,



DEAN A. GOULD
Base Closure Manager
By direction of the Director

Enclosure(s) 1. OU-1 and OU-2A Groundwater Remedy Schedule, Former MCAS El Toro

Copy to:

Commandant of the Marine Corps
Attn: LCDR Tricia Samora, USN
2 Navy Annex, Room 3109 (LFL)
Washington, D.C. 20380-1775

Irvine Ranch Water District
Attn: Mr. Steve Malloy
15600 Sand Canyon Avenue
Irvine, CA 92618

Commander
Attn: AC/S ENVIRON MGT
Marine Corps Air Bases, Miramar
P.O. Box 452001
San Diego, CA 92145-2001

Mr. Roy Herndon
Orange County Water District
10500 Ellis Avenue, P.O. Box 8300
Fountain Valley, CA 92708-8300

Mr. Jim Kikta
Marine Corps BRAC Project Manager
MCAS El Toro
7040 Trabuco Road
Irvine, CA 92618

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Writer: K. Ohannessian, Code 06CC.KHO, 10/15/04

Typist: K. Ohannessian, Code 06CC.KHO, 2-0796

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