



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

March 14, 2001

Mr. Dean Gould
Base Realignment and Closure
Environmental Coordinator
Southwest Division
Naval Facilities Engineering Command
P.O. Box 51718
Irvine, CA 92619-1718

Re: Responses to Agency Comments and Draft Final Documents for Marine Corps Air
Station, El Toro

Dear Mr. Gould:

The purpose of this letter is to bring the Navy's attention to EPA's concerns regarding submitting responses to agency comments within time frames set forth in the FFA, as well as with submitting documents as draft final when they are significantly different from the draft.

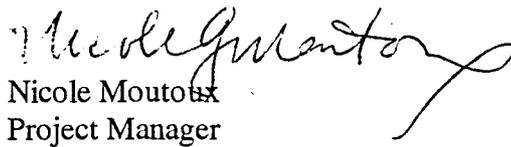
We understand that the Navy's approach has been to try and address what you perceive to be the greatest issues verbally and we agree that interim discussions involving agency comments before written responses are submitted are productive. However, we prefer to see responses to all comments before proceeding too far with any one comment or providing concurrence on a proposed action. In addition, discussion of one or several comments does not alleviate the requirement to submit responses to all comments in accordance with the deadlines in sections 7.7 through 7.9 of the FFA unless an extension is requested.

Finally, the language in sections 7.9 and 12.2 of the FFA is written such that if there are comments remaining after the issuance of the draft final document, the next step is the dispute resolution process. When the Navy issues a document as draft final when it more appropriately should be a revised draft, EPA believes it is putting the other parties of the agreement in an awkward position regarding what should happen next.

We thank the Navy for its open communication style and offer these comments in order to help make the cleanup process flow more smoothly and hopefully quickly. Please call me at (415) 972-3012 if you'd like to discuss this more fully.

received

Sincerely,



Nicole Mouton
Project Manager
Federal Facilities Cleanup Branch

cc: Triss Chesney, DTSC
Patricia Hannon, RWQCB
Michelle Schutz, EPA
Thelma Estrada, EPA