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MCAS EL TORO
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SUBJECT: FEDERAL FACILITY AGREEMENT (FFA) EXTENSION REQUEST
FOR INSTALLATION RESTORATION PROGRAM SITES 2 AND 17
FORMER MARINE CORPS AIR STATION (MCAS) EL TORO,
CALIFORNIA

Fellow Federal Facility Agreement (FFA) Representatives:

This letter is written to request an extension to the Marine Corps Air Station (MCAS) El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents.

Installation Restoration Program (IRP) Sites 2 and 17 (Magazine Road Landfill and Communication Station Landfill) require extensions for three primary documents: IRP Sites 2 and 17 Draft Operation and Maintenance (O&M Plan), IRP Site 2 Draft Remedial Action [Closeout] Report/Interim Remedial Action Completion Report (I-RACR), and IRP Site 17 Draft Remedial Action [Closeout] Report/I-RACR. With this letter, the Navy is introducing the I-RACR as the functionally equivalent document to the Remedial Action [Closeout] Report that was identified in the FFA. The Navy proposes this substitution of documents to align the environmental program at IRP Sites 2 and 17 with the *Department of Defense and Environmental Protection Agency Joint Guidance Recommended Streamlined Site Closeout and NPL Deletion Process For DoD Facilities* (March 2005), *Department of Navy (DON) Guidance*

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for Documenting Milestones throughout the Site Closeout Process (March 2006), and the DON Environmental Restoration Program Manual, Section 10.2.1 (August 2006).

The Navy proposes revised deliverable dates for the IRP Sites 2 and 17 Draft O&M Plan and the individual Draft I-RACRs for both IRP Sites 2 and 17 based on the additional time required to complete construction efforts at both sites. These construction delays were beyond the Navy's control and included: delays in procurement of the ET cover material because of inclement weather and delays associated with scheduling work around the California Gnatcatcher breeding season. This has been discussed at the last several Base Realignment and Closure (BRAC) Cleanup Team (BCT) meetings (including May 30, 2007), where the BCT agreed on extending the schedule due to the logical sequencing concerns of these documents. O&M plans are usually produced after the first year of operations to allow for adjustments to procedures; however, due to the nature of the landfill projects, the BCT agreed that producing the documents earlier than that could be beneficial. The requested schedule extension will result in timely production of these documents and will help ensure that the scope and content of the O&M Plan and individual I-RACRs will adequately address the landfills as constructed.

In accordance with Federal Facilities Agreement, Section 9.2 (g), the Navy is requesting extensions to the schedules for submitting the IRP Sites 2 and 17 Draft O&M Plan, the IRP Site 2 Draft I-RACR, and the IRP Site 17 Draft I-RACR as summarized in the following table. Consistent with discussions at the May 30, 2007 BCT Meeting, Appendix A IRP Sites 2 and 17 deliverables have been updated accordingly (Enclosure 1).

IRP Site 2 Magazine Road Landfill Primary Submittals	Current Deliverable Date	Revised Deliverable Date	Extension
IRP Sites 2 and 17 Draft Operation and Maintenance Plan	06-11-2007	09-14-2007	3 months
IRP Site 2 Draft Remedial Action [Closeout] Report/Draft Interim Remedial Action Completion Report	08-22-2007	01-22-2008	5 months
IRP Site 17 Communications Station Landfill Primary Submittal	Current Deliverable Date	Revised Deliverable Date	Extension
IRP Sites 2 and 17 Draft Operation and Maintenance Plan	06-11-2007	09-14-2007	3 months
IRP Site 17 Draft Remedial Action [Closeout] Report/Draft Interim Remedial Action Completion Report	08-22-2007	08-22-2008	12 months

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Thank you in advance for your support. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Project Manager, at (619) 532-0790 or me at (619) 532-0952.

Sincerely,



RICHARD WEISSENBORN
BRAC Environmental Coordinator
By direction of the Director

Enclosure: 1. Marine Corps Air Station El Toro Federal Facility Agreement Appendix
A Submittal Milestones (June 2007)

Copy to:

Commander

Attn: AC/S Environ Mgt

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Email/FFA Sch ext ltr site 2.doc

MARINE CORPS AIR STATION EL TORO

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Appendix A

Submittal Milestones

Site 1 (Explosive Ordnance Disposal Range)

Primary Submittal	Deliverable Date
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	01-29-2007
Draft Proposed Plan	07-31-2007
Draft Record of Decision	01-23-2008

Site 2 Groundwater (Magazine Road Landfill)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-28-2005
Draft Proposed Plan	12-08-2005
Draft Record of Decision	12-10-2007

Sites 2 & 17 (Magazine Road and Communication Station Landfills)

Primary Submittal	Deliverable Date
Draft Final Remedial Design	07-19-2004
Draft Sites 2 and 17 Operation and Maintenance Plan	09-14-2007
Draft Site 2 Remedial Action Report /Draft Interim Remedial Action Completion Report	01-22-2008
Draft Site 17 Remedial Action Report /Draft Interim Remedial Action Completion Report	08-22-2008

Sites 3 & 5 (Original and Perimeter Road Landfills)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-07-2005
Revised Draft Proposed Plan	12-21-2006
Revised Draft Record of Decision	04-02-2007

Anomaly Area 3

Primary Submittal	Deliverable Date
Draft Remedial Investigation/Feasibility Study	12-06-2005
Draft Proposed Plan	08-24-2007
Draft Record of Decision	02-06-2008

Sites 8 (DRMO Storage Yard) & 12 (Sludge Drying Beds)

Primary Submittal	Deliverable Date
Draft Feasibility Study Addendum	03-09-2005
Revised Draft Proposed Plan	04-01-2005
Revised Draft Record of Decision	05-19-2006

MARINE CORPS AIR STATION EL TORO

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Appendix A

Submittal Milestones

Site 16 (Crash Crew Pit No. 2)

Primary Submittal	Deliverable Date
Draft RD/RA MNA Work Plan	11-18-2003
Draft Remedial Design	07-27-2005
Draft Operating Properly and Successfully (OPS) Report	03-02-2006

Site 18 (VOC Regional Groundwater Plume)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	03-14-2005
Final Remedial Design (100% Design)	05-31-2005
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial Action Completion Report (I-RACR)	05-14-2007

Site 24 (VOC Source Area – Shallow Groundwater Unit)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	06-02-2004
Final Remedial Design (100% Design)	12-13-2004
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial Action Completion Report (I-RACR)	05-14-2007