



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

5090
Ser 06CC.DG/0163
February 19, 2002

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

Dear Mr. Scandura:

Subj: FEDERAL FACILITIES AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-
3, (SITE 1), MARINE CORPS AIR STATION (MCAS) EL TORO

This letter is written to request an extension to the MCAS El Toro Federal Facilities Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-3, Site 1, (Explosives Ordnance Disposal Range), requires revised milestone deliverable dates for the Draft Remedial Investigation (RI) Report (and ensuing deliverables). This request will extend the deliverable date for the Draft RI Report by one year, and is made pursuant to Section 9.2 (g) of the FFA.

From the time of the last schedule extension request (19 October 2000) significant progress has been made in the CERCLA process for IRP Site 1. Actions taken have been presented to the BCT and public during numerous conference calls and meetings. The actions and discussion completed since the last extension request include the following:

- Oct. 20 2000 Submitted the Response to Comments of the Draft Project Work Plan for Debris Removal.
- Oct 25 2000 Submitted the Draft Health and Safety Plan for Phase II Remedial Investigation.
- Dec 15 2000 DoN responded to extensive comments from the BCT related to the Draft Radiological Survey Plan and continued to work through issues associated with radiological concerns.
- Feb 8 2001 The Draft Final Work Plan Phase II Remedial Investigation was submitted to the BCT for review.
- Feb 8 2001 The Draft Final Health and Safety Plan were submitted for review
- Mar 29 2001 The Draft Work Plan Ordnance and Explosive Range Evaluation was submitted to the BCT for review
- Oct 22 2001 The Draft Final Work Plan Ordnance and Explosive Range Evaluation was submitted to the BCT for review
- Nov 1 2001 The Final Work Plan Phase II Remedial Investigation was submitted to the BCT for review.
- Dec 17 2001 The Final Work Plan, Ordnance and Explosive Range Evaluation was submitted to the BCT for review.

There have been several primary elements that have impacted the schedule which have resulted in the need for this request. The most significant of the impacts was the requirement for a Work Plan and associated public review and comment for the OE Range Evaluation. This activity alone has resulted in a twelve-month delay in being able to conduct fieldwork. While we agree with the BCT that this has resulted in a better end product, the activity and hence the impact was still not factored into the original schedule. The volume of comments and issues from the BCT, associated with the Site 1 Remedial Investigation, have also resulted in once again, a better product, but also unanticipated delay. Lastly, the radiological survey was completed a month beyond the original schedule (September 2000 vice August 2000), and as you are aware, the Release Report is still pending.

We are committed to continue to work closely with the BCT and public, to complete the RI and any remediation activities that may be required, as expeditiously as possible. The requested extension is necessary to enable the Navy to complete the RI and tabulate the related results. We will also continue to ensure that the BCT is kept apprised of activities at the site and provided, thorough, timely updates.

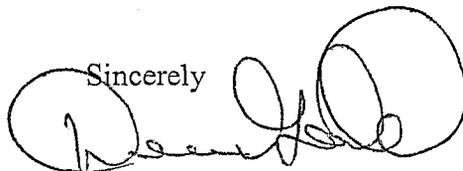
The proposed milestones, including the balance of the work to be performed are as follows:

	<u>Start</u>	<u>Complete</u>
Draft Final RI Work Plan	01/28/01	2/17/01
BCT Review	2/17/01	3/19/01
Draft OE Range Evaluation WP	3/19/01	3/29/01
BCT Review	3/29/01	5/02/01
Draft Final OE Range Evaluation	9/10/01	10/22/01
Final RI Work Plan	9/20/01	11/01/01
Public Notice for the OE Range Evaluation	11/03/01	12/03/01
Final OE Range Evaluation	12/03/01	12/17/01
Field Investigation	12/18/01	03/27/02
Data Evaluation & Validation	04/15/02	07/19/02
Risk Assessment	07/08/02	09/05/02
Preliminary Draft RI Report	07/25/02	11/27/02
Navy Review	11/28/02	1/08/03
Draft RI Report	1/08/03	2/19/03
BCT Review	2/19/03	4/21/03
Draft Final RI Report	4/22/03	7/01/03
BCT Review	7/02/03	7/31/03
Final RI Report	8/11/03	9/12/03
Preliminary Draft FS	7/02/03	9/23/03
Draft FS	10/24/03	12/06/03
BCT Review	12/07/03	2/04/04
Draft Final FS	2/07/04	4/18/04
BCT Review	4/19/04	5/18/04

Preliminary Draft PP	11/11/03	1/03/04
Draft Proposed Plan	2/03/04	3/18/04
BCT Review	3/19/04	5/17/04
Draft Final Proposed Plan	5/18/04	6/16/04
Preliminary Draft ROD	3/19/04	6/10/04
Draft ROD	7/11/04	8/25/04
BCT Review	8/26/04	10/24/04
Draft Final ROD	10/25/04	11/23/04

With the BCT working together on resolving any issues or concerns that may arise, we project an expedient completion of the required CERCLA process and associated documentation. Based on the current status of IR Site 1, we request an extension of one year, from February 19, 2002 to February 19, 2003.

Thank you in advance for your support. Should you have any questions, or need additional information, please contact me a 619-532-0765.

Sincerely


Dean Gould
 Base Realignment and Closure
 Environmental Coordinator
 By direction of the Commander

Copy to:
 Ms. Patricia Hannon
 California Regional Water Quality Control Board
 Santa Anna Region
 3737 Main Street, Suite 500
 Riverside, CA 92501-3339

Ms. Triss Chesney
 California Environmental Protection Agency
 Department of Toxic Substances Control
 5796 Corporate Avenue
 Cypress, CA 90630-4700

Ms. Nicole Moutoux
 U.S. Environmental Protection Agency
 Region IX, (SFD 8-2)
 Hazardous Waste Management Division
 75 Hawthorne Street
 San Francisco, Ca. 94105-3901

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	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	No Change	
 <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	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	No Change	
 <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

	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in 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	
Draft Final Record of Decision	15 Feb 02	11 Oct 02	+8 Months**
<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</u>			
Draft Remedial Investigation	7 Sep 99	No Change	
Draft Feasibility Study	N/A	No Change	
Draft Proposed Plan	9 Mar 00	No Change	
Draft Record of Decision	22 Nov 00	No Change	
<u>OU-3: Site 16</u>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	18 Feb 00	No Change	
Draft Proposed Plan	23 May 01	No Change	
Draft Record of Decision	1 Jun 02	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	19 Feb 02	19 Feb 03	+12 Months
Draft Feasibility Study	07 Dec 02	06 Dec 03	+12 Months
Draft Proposed Plan	19 Mar 03	18 Mar 04	+12 Months
Draft Record of Decision	26 Aug 03	25 Aug 04	+12 Months

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable

** Currently Pending BCT Approval