



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
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MCAS EL TORO
SSIC NO. 5090.3.A

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Remedial Project Manager
U.S. Environmental Protection Agency, Region IX
75 Hawthorne St (Mail Code SFD-8-1)
San Francisco, CA 94105

Mr. Quang Than
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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 APPENDIX A SCHEDULE EXTENSION
REQUEST, INSTALLATION RESTORATION PROGRAM SITE 1, FORMER
MARINE CORPS AIR STATION EL TORO, CALIFORNIA**

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) Site 1 (Former Explosive Ordnance Disposal [EOD] Training Range) requires revised deliverable dates for the Draft Final Soil Feasibility Study (FS), Draft Proposed Plan (PP), and Draft Record of Decision (ROD) based on requiring additional time to complete technical documentation to support subsequent project decisions. In response to the California Regional Water Quality Board, Santa Ana Region (RWQCB) comments on the on the Draft Final Remedial Investigation (RI) and Draft FS Reports, the Navy included monitoring of five wells at IRP Site 1 for total petroleum hydrocarbon (TPH) and volatile organic compounds (including benzene, toluene, ethylbenzene, and total xylenes) in the groundwater monitoring program. The purpose of the monitoring was to evaluate whether groundwater quality was impaired by TPH compounds in soil in the central portion of the site. To expedite transmitting the results of the monitoring activities, the Navy is preparing a Letter

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Report in advance of the general groundwater monitoring report to facilitate completion of the Draft Final Soil FS. This Letter Report will be issued as a supporting FS document, on March 20, 2008 for regulatory agency review and comment.

Additionally, as discussed at the January 30, 2008 Base Realignment and Closure (BRAC) Cleanup Team (BCT) meeting, the Munitions Debris Characterization Work Plan Addendum and associated fieldwork has been delayed due to several compounding factors including an increased scope due to the October 2007 Santiago Canyon wildfire. Activities under the Munitions Debris Characterization Work Plan Addendum include confirmation of the site conceptual model and characterization of the soil-filled ammunition cans surrounding the observation bunker.

The table below summarizes the effect of this extension request for IRP Site 1, which is made pursuant to FFA Section 9.2(g). Enclosure (1) presents our FFA schedule with the revised primary milestones included. Enclosure (2) presents a detailed project schedule. Please note that the schedule includes distribution, in April 2008, of the response to agency comments relating to the soil alternatives evaluated in the Draft FS Report. The responses will be discussed at the April 23, 2008 BCT meeting to ensure that all agency comments are addressed. Finally, the ROD schedule includes consideration for an optimal public comment period to coincide with the January 2009 Restoration Advisory Board meeting; thus avoiding the holiday season.

IRP Site 1 Soil Primary Submittal	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Final Soil Feasibility Study	3/19/2008	6/25/2008	~3 Month
Draft Proposed Plan	6/11/2008	9/17/2008	~3 Month
Draft Record of Decision	12/04/2008	3/30/2009	~4 Month

Thank you for your cooperation and continued support. Should you have questions or need additional information, please contact Ms. Content Arnold at (619) 532-0790 or Mr. Jim Callian at (619) 532-0779.

Sincerely,



DEBRA THEROUX
Acting Base Closure Manager
By direction of the Director

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- Enclosures: 1. Federal Facility Agreement Appendix A Schedule, Former MCAS El Toro
(March 2008)
2. Site 1 FFA Schedule, Former MCAS El Toro (March 2008)

Copy to:

Commanding Officer
MCAS Miramar
Environmental Management Department
P.O. Box 452001
Bldg 6317
San Diego, CA 92145-2001

MARINE CORPS AIR STATION EL TORO

Federal Facility Agreement

Appendix A

Submittal Milestones

Site 1 Soil (Former Explosive Ordnance Disposal [EOD] Training Range)

Primary Submittal	Deliverable Date
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	01-29-2007
<i>Draft Final Feasibility Study</i>	<i>06-25-2008</i>
<i>Draft Proposed Plan</i>	<i>09-17-2008</i>
<i>Draft Record of Decision</i>	<i>03-30-2009</i>

Site 1 (Former EOD Training Range) 1 & Site 2 (Magazine Road Landfill) Groundwater

Primary Submittal	Deliverable Date
Draft Final Feasibility Study	11-17-2008
Draft Proposed Plan	02-16-2009
Draft Record of Decision	09-03-2009

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
Site 2 Draft Interim-Remedial Action Completion Report (I-RACR)	07-14-2008
Site 17 Draft Interim-Remedial Action Completion Report (I-RACR)	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	06-09-2008
Draft Record of Decision	02-10-2009

MARINE CORPS AIR STATION EL TORO

Federal Facility Agreement

Appendix A

Submittal Milestones

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

Primary Submittal	Deliverable Date
Draft Remedial Design (RD)/Remedial Action (RA) Work Plan	09-12-2007
Construction Quality Assurance (CQA) Plan	09-12-2007
Construction Quality Control (CQC) Plan	09-12-2007
Project Closeout Report	10-09-2008

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

ID	Task Name	Duration	Start	Finish	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
1861	Site 1	4196 days	Wed 3/8/00	Wed 4/6/16	[Gantt bar]																
1876	Remedial Investigation and Report	47 days	Thu 10/26/06	Fri 12/29/06	[Gantt bar]																
1877	Final RI (Replacement Pages)	47 days	Thu 10/26/06	Fri 12/29/06	[Gantt bar]																
1878	Feasibility Study	104 days	Tue 11/7/06	Fri 3/30/07	[Gantt bar]																
1879	Draft FS (Appx A: 01/29/07)	60 days	Tue 11/7/06	Mon 1/29/07	[Gantt bar]																
1880	Regulatory Agency Review Draft FS	60 edays	Mon 1/29/07	Fri 3/30/07	[Gantt bar]																
1881	IRP Site 1 Soil Remedy	1146 days	Fri 6/1/07	Fri 10/21/11	[Gantt bar]																
1882	Site 1 Soil FS	279 days	Fri 6/1/07	Wed 6/25/08	[Gantt bar]																
1883	Supplemental Munitions & Groundwater Sampling	253 days	Fri 6/1/07	Tue 5/20/08	[Gantt bar]																
1884	Draft Groundwater Sampling Work Plan	20 days	Fri 6/1/07	Thu 6/28/07	[Gantt bar]																
1885	Regulatory Agency Review	22 days	Fri 6/29/07	Mon 7/30/07	[Gantt bar]																
1886	Final Groundwater Sampling Work Plan	22 days	Tue 7/31/07	Wed 8/29/07	[Gantt bar]																
1887	Groundwater Sampling	76 days	Mon 11/26/07	Mon 3/10/08	[Gantt bar]																
1888	Sampling Event #1	5 days	Mon 11/26/07	Fri 11/30/07	[Gantt bar]																
1890	Letter Report	100 days	Wed 1/2/08	Tue 5/20/08	[Gantt bar]																
1893	Draft Letter Report	19 days	Fri 2/22/08	Wed 3/19/08	[Gantt bar]																
1894	Regulatory Agency Review	22 days	Thu 3/20/08	Fri 4/18/08	[Gantt bar]																
1895	Final Letter Report	22 days	Mon 4/21/08	Tue 5/20/08	[Gantt bar]																
1896	Munitions Characterization	222 days	Tue 7/31/07	Wed 6/4/08	[Gantt bar]																
1897	Explosive Safety Submission (ESS)	183 days	Tue 7/31/07	Thu 4/10/08	[Gantt bar]																
1905	Munitions Characterization Work Plan Addendum	162 days	Tue 10/9/07	Wed 5/21/08	[Gantt bar]																
1908	Draft Work Plan Addendum	15 days	Tue 3/18/08	Mon 4/7/08	[Gantt bar]																
1909	Regulatory Agency Review	22 days	Tue 4/8/08	Wed 5/7/08	[Gantt bar]																
1910	Final Work Plan Addendum	10 days	Thu 5/8/08	Wed 5/21/08	[Gantt bar]																
1911	Field Work	10 days	Thu 5/22/08	Wed 6/4/08	[Gantt bar]																
1912	Issue RTCs for Soil Alternatives	0 days	Wed 4/9/08	Wed 4/9/08	[Gantt bar]																
1913	Draft Final FS	90 days	Thu 2/21/08	Wed 6/25/08	[Gantt bar]																
1916	Issue DF Soil FS (Appendix A : 6/25/08)	15 days	Thu 6/5/08	Wed 6/25/08	[Gantt bar]																
1917	Regulatory Agency Concur or Dispute	22 days	Thu 6/26/08	Fri 7/25/08	[Gantt bar]																
1918	Final FS	0 days	Fri 7/25/08	Fri 7/25/08	[Gantt bar]																
1919	Proposed Plan IRP Site 1 Soil Remedy	162 days	Thu 6/26/08	Fri 2/6/09	[Gantt bar]																
1922	Draft PP (Appendix A : 9/17/08)	15 days	Thu 8/28/08	Wed 9/17/08	[Gantt bar]																
1923	Regulatory Agency Review	22 days	Thu 9/18/08	Fri 10/17/08	[Gantt bar]																
1924	Draft Final PP	22 days	Mon 10/20/08	Tue 11/18/08	[Gantt bar]																
1925	Regulatory Agency Concur/Dispute	10 days	Wed 11/19/08	Tue 12/2/08	[Gantt bar]																
1926	Final PP	0 days	Tue 1/6/09	Tue 1/6/09	[Gantt bar]																
1927	Public Meeting	0 days	Wed 1/28/09	Wed 1/28/09	[Gantt bar]																
1928	Public Comment	23 days	Wed 1/7/09	Fri 2/6/09	[Gantt bar]																
1929	Record of Decision IRP Site 1 Soil Remedy	186 days	Wed 12/3/08	Wed 8/19/09	[Gantt bar]																
1933	Draft ROD (Appendix A : 3/30/09)	22 days	Fri 2/27/09	Mon 3/30/09	[Gantt bar]																
1934	Regulatory Agency Review	45 days	Tue 3/31/09	Mon 6/1/09	[Gantt bar]																
1935	Draft Final ROD	35 days	Tue 6/2/09	Mon 7/20/09	[Gantt bar]																
1936	Regulatory Agency Concur/Dispute	22 days	Tue 7/21/09	Wed 8/19/09	[Gantt bar]																
1937	Final ROD	0 days	Wed 8/19/09	Wed 8/19/09	[Gantt bar]																

Project: Former MCAS EI Toro
 Date: Tue 3/18/08

Task [] Milestone [] Rolled Up Task [] Rolled Up Progress []
 Progress [] Summary [] Rolled Up Milestone []

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Blind copy to:

BPMOW:

C. Arnold
J. Callian
M. Flesch, USMC BRAC
X Drive file
Serial file

SWDIV:

D. Silva, FISC Bldg-1, 1220 Pacific Highway Mailroom (Administrative Record – 2 copies)
D. Silva, FISC Bldg-1, 1220 Pacific Highway Mailroom (Information Repository – 1 copy)

Writer: Content Arnold, x 2-0790.

Typist: N. Lilley, 03/19/08

Email/FFA Extension Request IRP Site 1 DRAFT_team edits.doc