



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

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MAR 5 2009

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U.S. Environmental Protection Agency  
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Mr. John Broderick  
Remedial Project Manager  
California Regional Water Quality Control Board  
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Fellow Federal Facility Agreement (FFA) Representatives:

**SUBJECT: FEDERAL FACILITY AGREEMENT SCHEDULE EXTENSION REQUEST,  
FOR INSTALLATION RESTORATION PROGRAM SITES 3 AND 5, FORMER  
MARINE CORPS AIR STATION, EL TORO, CALIFORNIA**

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

Installation Restoration Program (IRP) Landfill Sites 3 and 5 require revised deliverable dates for the Draft Operations and Maintenance/Long-Term Monitoring (O&M/LTM) Plan based on delays associated with the preparation of the Draft Final Remedial Design/Remedial Action (RD/RA) Work Plan. The Navy provided an e-mail to the FFA representatives on January 23, 2009 to inform them that per Section 7.7 (g) of the FFA, the Navy required an additional 30-days beyond the initial 60-day timeframe to submit the Draft Final RD/RA Work Plan. The Navy is continuing to work internally with our Radiological Affairs Support Office (RASO) in the development of procedures for radiological screening associated with the field efforts. Additional time is necessary to coordinate with RASO and ensure the procedures are consistent with the approach at other Base Realignment and Closure (BRAC) bases. Therefore, the Navy

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requires an additional 49-days to submit the Draft Final RD/RA Work Plan. The revised submittal date will be Friday, April 24, 2009. For the reasons noted above, the Navy finds good cause for this delay.

Based on the delay in submitting the Draft Final RD/RA Work Plan, the corresponding O&M/LTM Plan will be delayed to ensure that the O&M/LTM Plan is finalized at the time the landfill construction activities are completed. This approach will allow for O&M activities to proceed immediately after the remedy is in place at Sites 3 and 5. The additional time for preparation of the Draft O&M/LTM Plan will also allow for incorporation of the Land Use Control (LUC) Design into the draft document. A separate letter will be sent to the FFA signatories addressing the rationale for including the LUC Design into the Draft O&M/LTM Plan.

The following site table identifies the three primary submittals and the associated schedule extensions relating to this request, which is made pursuant to FFA Sections 9.2(d) and 9.2(g) for IRP Sites 3 and 5. Enclosure (1) presents our FFA schedule with the revised primary milestones included. Enclosures (2) presents a detail project schedule with supporting document submittal dates.

<b>IRP Site 3 and 5 Primary Submittal</b>	<b>Current Deliverable Date</b>	<b>Revised Deliverable Date</b>	<b>Extension</b>
Draft Operations and Maintenance/Long-Term Monitoring Plan	April 9, 2009	June 23, 2009	+2-1/2 months
Draft Interim-Remedial Action Completion Report	January 26, 2010	April 7, 2010	+2-1/2 months
Draft Operating Properly and Successfully Report	December 8, 2010	February 24, 2010	+2-1/2 months

Thank you in advance for your support. Should you have questions or need additional information, please contact Mr. Marc P. Smits, Remedial Project Manager, at (619) 532-0793.

Sincerely,



ANTHONY MEGLIOLA  
Base Closure Manager  
By direction of the Director

Enclosures: 1. Federal Facility Agreement Appendix A Schedule, Former MCAS El Toro (March 1, 2009)  
2. Sites 3 and 5 Project Schedule, Former MCAS El Toro (March 2009)

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Copy to:  
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Blind copy to (w/ encl):

BPMOW:

D. Theroux  
M. Smits  
C. Arnold  
S. Rawal, USMC BRAC  
X Drive file  
Serial file

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Writer: Marc P. Smits, 2-0793.

Typist: N. Lilley, 03/05/09

Email/FFA Ext Ltr – OM Plan – site 3 5.doc

# MARINE CORPS AIR STATION EL TORO

## Federal Facility Agreement

### Appendix A

#### Submittal Milestones

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

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	01-29-2007
Draft Proposed Plan	03-24-2010
Draft Record of Decision	12-03-2010

<b>Draft Final Submittal</b>	<b>Deliverable Date</b>
Draft Final Feasibility Study	08-29-2008

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

##### Groundwater

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Proposed Plan	03-24-2010
Draft Record of Decision	12-03-2010

<b>Draft Final Submittal</b>	<b>Deliverable Date</b>
Draft Final Feasibility Study	12-22-2009

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

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Final Remedial Design	07-19-2004
Draft Sites 2 and 17 Operation and Maintenance Plan	09-14-2007
Site 2 Draft Remedial Action Completion Report	10-24-2008
Site 17 Draft Remedial Action Completion Report	10-24-2008

#### Sites 3 & 5 (Original and Perimeter Road Landfills)

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Remedial Design/Remedial Action Work Plan*	09-02-2008
<i>Draft Operation and Maintenance Plan/Long-Term Monitoring Plan**</i>	<i>06-23-2009</i>
<i>Draft Interim-Remedial Action Completion Report***</i>	<i>04-07-2010</i>
<i>Draft Operating Properly and Successfully Report</i>	<i>02-24-2011</i>

\* Includes Construction Quality Assurance (CQA) Plan, Construction Quality Control (CQC) Plan, and Contingency Plan

\*\* Includes Long-Term Contingency Plan

\*\*\*Equivalent to Project Closeout Report

# MARINE CORPS AIR STATION EL TORO

## Federal Facility Agreement

### Appendix A

#### Submittal Milestones

#### Anomaly Area 3

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Remedial Investigation/Feasibility Study	12-06-2005
Draft Proposed Plan	06-23-2008
Draft Record of Decision	08-10-2009

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

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Remedial Design/Remedial Action Work Plan	09-12-2007
Construction Quality Assurance Plan	09-12-2007
Construction Quality Control Plan	09-12-2007
Draft Project Closeout Report	04-03-2009

#### Site 16 (Crash Crew Pit No. 2)

<b>Primary Submittal</b>	<b>Deliverable Date</b>
Draft Remedial Design/Remedial Action MNA Work Plan	11-18-2003
Draft Remedial Design	07-27-2005
Draft Operating Properly and Successfully Report	03-02-2006

#### Site 18 (VOC Regional Groundwater Plume)

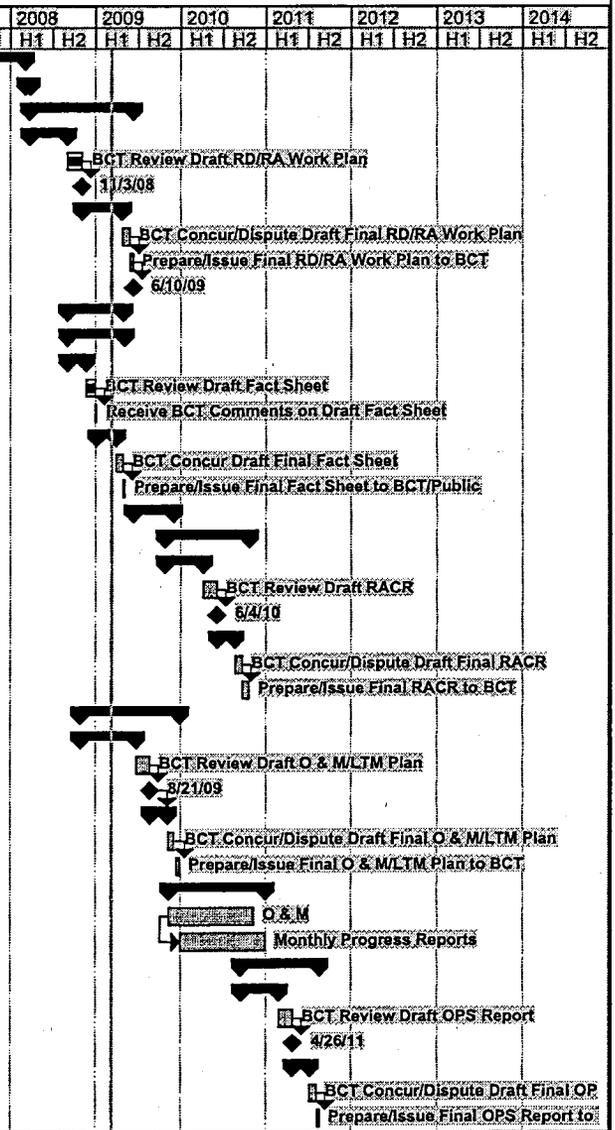
<b>Primary Submittal</b>	<b>Deliverable Date</b>
Preliminary Remedial Design (90% Design)	03-14-2005
Final Remedial Design (100% Design)	05-31-2005
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial Action Completion Report	05-14-2007

#### Site 24 (VOC Source Area – Shallow Groundwater Unit)

<b>Primary Submittal</b>	<b>Deliverable Date</b>
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	05-14-2007

**Revised Post-ROD RD/RA FFA Schedule  
Remedial Action at OU-2C, IRP Landfill - Sites 3 and 5  
Former MCAS El Toro, California**

ID	Task Name	Duration	Start	Finish	2007	2008	2009	2010	2011	2012	2013	2014
					H1	H2	H1	H2	H1	H2	H1	H2
1	RECORD OF DECISION (ROD)	101 days	10/5/07	3/6/08								
6	POST ROD-RD/RA FFA SCHEDULE	14 days	3/7/08	3/27/08								
13	RD/RA WORK PLAN (INCLUDES COAP/CQCP/CONTINGENCY PLAN)	306 days	3/24/08	6/10/09								
14	Prepare/Issue Draft RD/RA Work Plan to BCT	114 days	3/24/08	9/2/08								
21	BCT Review Draft RD/RA Work Plan	43 days	9/3/08	11/3/08								
22	Receive BCT Comments on Draft RD/RA Work Plan	0 days	11/3/08	11/3/08								
23	Prepare/Issue Draft Final RD/RA Work Plan to BCT	117 days	11/4/08	4/24/09								
30	BCT Concur/Dispute Draft Final RD/RA Work Plan	22 days	4/27/09	5/27/09								
31	Prepare/Issue Final RD/RA Work Plan to BCT	10 days	5/28/09	6/10/09								
32	Notice to Proceed	0 days	6/10/09	6/10/09								
33	APP/HASP	164 days	9/3/08	4/30/09								
40	FACT SHEET	167 days	9/3/08	5/5/09								
41	Prepare/Issue Draft Fact Sheet to BCT	54 days	9/3/08	11/19/08								
48	BCT Review Draft Fact Sheet	27 days	11/20/08	12/31/08								
49	Receive BCT Comments on Draft Fact Sheet	16 hrs	12/31/08	1/5/09								
50	Prepare/Issue Draft Final Fact Sheet to BCT	58 days	1/6/09	3/30/09								
57	BCT Concur Draft Final Fact Sheet	21 days	3/31/09	4/28/09								
58	Prepare/Issue Final Fact Sheet to BCT/Public	5 days	4/29/09	5/5/09								
59	FIELD CONSTRUCTION - SITES 3 & 5	118 days	6/11/09	12/1/09								
103	REMEDIATION ACTION COMPLETION REPORT (PROJECT CLOSEOUT REPORT)	248 days	10/26/09	10/21/10								
104	Prepare/Issue Draft RACR to BCT	111 days	10/26/09	4/7/10								
111	BCT Review Draft RACR	41 days	4/8/10	6/4/10								
112	Receive BCT Comments on Draft RACR	0 days	6/4/10	6/4/10								
113	Prepare/Issue Draft Final RACR to BCT	54 days	6/7/10	8/20/10								
120	BCT Concur/Dispute Draft Final RACR	22 days	8/23/10	9/22/10								
121	Prepare/Issue Final RACR to BCT	20 days	9/23/10	10/21/10								
122	O & MLTM PLAN (INCLUDES LONG-TERM CONTINGENCY PLAN)	290 days	10/28/08	12/28/09								
123	Prepare/Issue Draft O & MLTM Plan to BCT	163 days	10/28/08	6/23/09								
130	BCT Review Draft O & MLTM Plan	42 days	6/24/09	8/21/09								
131	Receive BCT Comments on Draft O & MLTM Plan	0 days	8/21/09	8/21/09								
132	Prepare/Issue Draft Final O & MLTM Plan to BCT	53 days	8/24/09	1/6/10								
139	BCT Concur/Dispute Draft Final O & MLTM Plan	22 days	1/9/10	12/11/09								
140	Prepare/Issue Final O & MLTM Plan to BCT	10 days	12/14/09	12/28/09								
141	O & M	282 days	11/12/09	12/30/10								
142	O & M	250 days	11/12/09	11/10/10								
143	Monthly Progress Reports	250 days	12/31/09	12/30/10								
144	OPERATING PROPERLY AND SUCCESSFULLY REPORT	235 days	9/15/10	8/19/11								
145	Prepare/Issue Draft OPS Report to BCT	109 days	9/15/10	2/24/11								
152	BCT Review Draft OPS Report	43 days	2/25/11	4/26/11								
153	Receive BCT Comments on Draft OPS Report	0 days	4/26/11	4/26/11								
154	Prepare/Issue Draft Final OPS Report to BCT	51 days	4/27/11	7/6/11								
161	BCT Concur/Dispute Draft Final OPS Report	22 days	7/7/11	8/5/11								
162	Prepare/Issue Final OPS Report to BCT	10 days	8/8/11	8/19/11								



MCAS El Toro California  
Date: 3/5/09

Task		Milestone		External Tasks	
Split		Summary		External Milestone	
Progress		Project Summary		Deadline	

ENCLOSURE 2