



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

Cert No. P115386603
5090
Ser 06CC.DG/194
March 17, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Glenn R. Kistner
U.S. Environmental Protection Agency
Region IX, (SFD 8-2)
Hazardous Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105-3901

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Kistner:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -2C (Sites 3 & 5) requires a revised milestone deliverable date for the Draft Final Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable date by nine months, and is made pursuant to Section 9.2 (g) of the FFA.

In the August 17, 1999 extension request, elements of the Historical Radiological Assessment (HRA) were discussed. Estimates in that request were based on information gathered to date, and past experience by our contractor in the performance of such studies. That letter also described, and later was agreed upon by the BCT, that the HRA effort was integral to the proper publication of a ROD associated with the landfills at IR Sites 3 & 5.

Since last August, the RAB and public have had tremendous interest and input on the HRA. To address the high level of involvement, we have made HRA presentations at each ensuing RAB, featuring a different step of the process, along with providing a schedule update. Initially, the HRA had identified 12 sites as candidates for a radiological survey. As a result substantial comments received on the October 1999 Draft HRA, five additional sites have been identified for inclusion into the survey plan, with four more under consideration. In addition to the impact these comments and sites have had on the publication of the Final HRA and Survey Plan, the actual field time will of course be correspondingly increased. The incorporation of these additional sites and material is essentially complete into the respective documents, however, the review periods have been impacted. Currently, the schedule for the HRA effort is as follows:

Draft Final Survey Plan	Aug 2000
Final Survey Plan	Sep 2000
Field Work	Sep-Dec 2000
Draft Release Report	Jan 2001
Draft Final Release Report	Mar 2001
Final Release Report	May 2001

To help minimize the impact of this extended schedule on OU-2C, these landfills will have priority for the actual survey work, and are expected to be surveyed in September-October 2000. With favorable survey results and BCT concurrence, methods for issuance of the Final ROD prior to the Final Release Report must be explored.

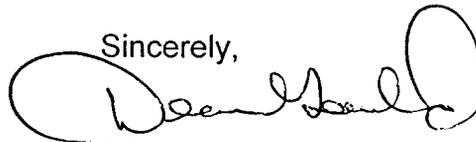
Analysis, interpretation, and interim publication of the data will be required, after the survey is complete. It will then be incorporated into the ROD, for BCT concurrence. The ROD schedule can be positively impacted however, if the BCT can commit to reaching agreement on all of the contents of the ROD, pending the survey results, prior to the survey work being complete. With this commitment in place, the following schedule is proposed for OU-2C:

Survey results published	17 Oct 00
Survey results/final comments incorporated, sent to BCT	17 Nov 00
Final BCT review complete, Issuance of Final ROD	15 Dec 00

This extension request incorporates both practical steps with realistic time frames, along with proposals for increased collaboration by the BCT and our supporting contractors for OU-2C to be executed in as timely a manner as possible.

As a result of significant public interest and input on the HRA, and the number of sites to be included in the assessment increasing by 40-75%, we request a 9-month extension to submit the Final ROD for OU-2C. No other OU-2C submittals are currently impacted by this request. The proposed date for submitting a new Final ROD would change from March 17, 2000, to December 15, 2000. Thank you in advance for your support, and please call me at (619) 532-0784 if you have any questions, or need additional information.

Sincerely,



DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals



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

Cert No. P115386604
5090
Ser 06CC.DG/195
March 17, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

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

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Scandura:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -2C (Sites 3 & 5) requires a revised milestone deliverable date for the Draft Final Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable date by nine months, and is made pursuant to Section 9.2 (g) of the FFA.

In the August 17, 1999 extension request, elements of the Historical Radiological Assessment (HRA) were discussed. Estimates in that request were based on information gathered to date, and past experience by our contractor in the performance of such studies. That letter also described, and later was agreed upon by the BCT, that the HRA effort was integral to the proper publication of a ROD associated with the landfills at IR Sites 3 & 5.

Since last August, the RAB and public have had tremendous interest and input on the HRA. To address the high level of involvement, we have made HRA presentations at each ensuing RAB, featuring a different step of the process, along with providing a schedule update. Initially, the HRA had identified 12 sites as candidates for a radiological survey. As a result substantial comments received on the October 1999 Draft HRA, five additional sites have been identified for inclusion into the survey plan, with four more under consideration. In addition to the impact these comments and sites have had on the publication of the Final HRA and Survey Plan, the actual field time will of course be correspondingly increased. The incorporation of these additional sites and material is essentially complete into the respective documents, however, the review periods have been impacted. Currently, the schedule for the HRA effort is as follows:

Draft Final Survey Plan	Aug 2000
Final Survey Plan	Sep 2000
Field Work	Sep-Dec 2000
Draft Release Report	Jan 2001
Draft Final Release Report	Mar 2001
Final Release Report	May 2001

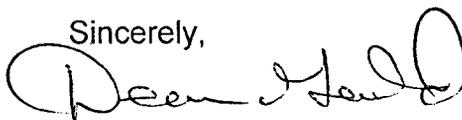
To help minimize the impact of this extended schedule on OU-2C, these landfills will have priority for the actual survey work, and are expected to be surveyed in September-October 2000. With favorable survey results and BCT concurrence, methods for issuance of the Final ROD prior to the Final Release Report must be explored.

Analysis, interpretation, and interim publication of the data will be required, after the survey is complete. It will then be incorporated into the ROD, for BCT concurrence. The ROD schedule can be positively impacted however, if the BCT can commit to reaching agreement on all of the contents of the ROD, pending the survey results, prior to the survey work being complete. With this commitment in place, the following schedule is proposed for OU-2C:

Survey results published	17 Oct 00
Survey results/final comments incorporated, sent to BCT	17 Nov 00
Final BCT review complete, Issuance of Final ROD	15 Dec 00

This extension request incorporates both practical steps with realistic time frames, along with proposals for increased collaboration by the BCT and our supporting contractors for OU-2C to be executed in as timely a manner as possible.

As a result of significant public interest and input on the HRA, and the number of sites to be included in the assessment increasing by 40-75%, we request a 9-month extension to submit the Final ROD for OU-2C. No other OU-2C submittals are currently impacted by this request. The proposed date for submitting a new Final ROD would change from March 17, 2000, to December 15, 2000. Thank you in advance for your support, and please call me at (619) 532-0784 if you have any questions, or need additional information.

Sincerely,

 DEAN GOULD
 Base Realignment and Closure
 Environmental Coordinator
 By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals



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

Cert No. P115386605
5090
Ser 06CC.DG/196
March 17, 2000

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Ms. Patricia Hannon
California Regional Water Quality Control Board
Santa Ana Region
Remedial Project Manager
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Hannon:

This letter is to request a change to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -2C (Sites 3 & 5) requires a revised milestone deliverable date for the Draft Final Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable date by nine months, and is made pursuant to Section 9.2 (g) of the FFA.

In the August 17, 1999 extension request, elements of the Historical Radiological Assessment (HRA) were discussed. Estimates in that request were based on information gathered to date, and past experience by our contractor in the performance of such studies. That letter also described, and later was agreed upon by the BCT, that the HRA effort was integral to the proper publication of a ROD associated with the landfills at IR Sites 3 & 5.

Since last August, the RAB and public have had tremendous interest and input on the HRA. To address the high level of involvement, we have made HRA presentations at each ensuing RAB, featuring a different step of the process, along with providing a schedule update. Initially, the HRA had identified 12 sites as candidates for a radiological survey. As a result substantial comments received on the October 1999 Draft HRA, five additional sites have been identified for inclusion into the survey plan, with four more under consideration. In addition to the impact these comments and sites have had on the publication of the Final HRA and Survey Plan, the actual field time will of course be correspondingly increased. The incorporation of these additional sites and material is essentially complete into the respective documents, however, the review periods have been impacted. Currently, the schedule for the HRA effort is as follows:

Draft Final Survey Plan	Aug 2000
Final Survey Plan	Sep 2000
Field Work	Sep-Dec 2000
Draft Release Report	Jan 2001
Draft Final Release Report	Mar 2001
Final Release Report	May 2001

To help minimize the impact of this extended schedule on OU-2C, these landfills will have priority for the actual survey work, and are expected to be surveyed in September-October 2000. With favorable survey results and BCT concurrence, methods for issuance of the Final ROD prior to the Final Release Report must be explored.

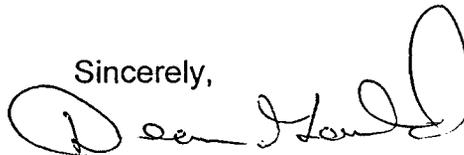
Analysis, interpretation, and interim publication of the data will be required, after the survey is complete. It will then be incorporated into the ROD, for BCT concurrence. The ROD schedule can be positively impacted however, if the BCT can commit to reaching agreement on all of the contents of the ROD, pending the survey results, prior to the survey work being complete. With this commitment in place, the following schedule is proposed for OU-2C:

Survey results published	17 Oct 00
Survey results/final comments incorporated, sent to BCT	17 Nov 00
Final BCT review complete, Issuance of Final ROD	15 Dec 00

This extension request incorporates both practical steps with realistic time frames, along with proposals for increased collaboration by the BCT and our supporting contractors for OU-2C to be executed in as timely a manner as possible.

As a result of significant public interest and input on the HRA, and the number of sites to be included in the assessment increasing by 40-75%, we request a 9-month extension to submit the Final ROD for OU-2C. No other OU-2C submittals are currently impacted by this request. The proposed date for submitting a new Final ROD would change from March 17, 2000, to December 15, 2000. Thank you in advance for your support, and please call me at (619) 532-0784 if you have any questions, or need additional information.

Sincerely,



DEAN GOULD
 Base Realignment and Closure
 Environmental Coordinator
 By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals

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	per FFA	No Change	
Draft Record of Decision	27 Nov 00	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	per FFA	No Change	
Draft Record of Decision	27 Nov 00	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

	Current	New	Change in
	<u>Completion Dates</u>	<u>Completion Dates</u>	<u>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	17 Mar 00	15 Dec 00	+9 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	12 Oct 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	25 Sep 00	No Change	
Draft Record of Decision	30 Apr 01	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	17 Oct 01**	
Draft Feasibility Study	11 Sep 00	19 Jun 02**	
Draft Proposed Plan	18 Apr 01	20 Jan 03**	
Draft Record of Decision	14 Dec 01	20 Nov 03**	

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable, **Have not received BCT approval