



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

M60050.000554
MCAS EL TORO
SSIC # 5090.3

5090
Ser 06CC.DG/843
17 October, 2000

Mr. John Broderick
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)-3
(SITES 7&14), MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Broderick:

This purpose of this letter is to formally request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3, Sites 7&14, (Drop Tank Drainage Area #2 & Battery Acid Disposal Area), requires a revised milestone deliverable date for the Draft Record of Decision (ROD). Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable date for the Draft Record of Decision by 6 weeks, and is made pursuant to Sections 9.2 (e) and (g) of the FFA.

The schedule and deliverables for Sites 7&14 have been the topics of significant discussion recently by the BCT, primarily focusing on the Proposed Plan. At the 27 September 2000 BCT meeting, a detailed schedule with a revised timeline was distributed to, and reviewed with, the BCT. The dates in that schedule are consistent with the extension request made in this letter. There was general consensus at that time that the dates appeared reasonable.

The causal factor in the Draft ROD date shifting has to do primarily with the scheduling of the public meeting for the Proposed Plan. In addition to other dates, we have RAB meetings scheduled on July 26, September 27, and November 29 in 2000. It was proposed to the RAB at the July 26 meeting that we could possibly have a joint RAB/Proposed Plan meeting on September 27. The anticipated benefits to this were room availability and increased attendance. The RAB was not particularly receptive to the joint meeting format however, as witnessed by the BCT and the DTSC Public participation Specialist, and so an alternate date was sought out. Considering room restrictions, RAB dates, and the established policy of having the meeting roughly mid-way through the public comment period, the earliest available date for the public meeting was 25 October 2000.

The 25 October 2000 Public meeting date has been further communicated to the BCT via email in August and September and as discussed in teleconferences in August and October. While we feel at this time based on our research that no further action will be required at these sites, we also feel it inappropriate to release a Draft ROD to the BCT, prior to the public comment period being complete. The BCT has also expressed a similar concern. Based on this criterion, the following schedule is proposed:

Proposed Plan:

Public Comment Period	10/10/00-11/08/00
Public Meeting	10/25/00

ROD

Incorporate SWDIV Comments	9/18/00-10/17/00
Prepare Responsiveness Summary (RS)	11/9/00-11/15/00
SWDIV Review/incorporation of RS	11/16/00-11/21/00
Draft ROD	11/22/00

We feel that the schedule as described above, presents the most aggressive approach we can take, while maintaining the integrity of the public comment period. With your concurrence, the deliverable date for the Draft Record of Decision will be adjusted from 12 October 00, to 22 November 00. 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

Copy to: (w/encl)
Mr. John Scandura, DTSC
Mr. Glenn Kistner, U.S. EPA

APPENDIX A

MCAS El Toro Schedule

	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
<u>Operable Unit (OU)-1: Site 18</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	18 Dec 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	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 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 <u>Completion Dates</u>	New <u>Completion Dates</u>	Change in <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	15 Dec 00	No Change	
<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	22 Nov 00	+6 Weeks
<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	17 Jan 01	No Change	
Draft Record of Decision	06 Jul 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