



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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SAN DIEGO, CALIFORNIA 92132-5190

M60050.000556
MCAS EL TORO
SSIC # 5090.3

5090
Ser 1812.AP/1637
13 Dec 91

Ms. Julie Anderson
Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Anderson:

I am requesting time extensions for deliverables of the Draft RCRA Facility Assessment (RFA) Report and Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan for Operable Unit 4 for the Marine Corps Air Station (MCAS) El Toro in accordance with Section 9 of the FFA.

I am requesting these extensions based on "good cause" provisions of Subsection 9.2 (a) and (g) of the FFA. Since the negotiation of the FFA, the scope of work has increased significantly. The RFA which initiates Operable Unit 4, has identified 299 sites with 157 recommended for a sampling visit, much more than the 35-37 sites identified by the water control board. Added increases in scope have also occurred in the development of the Site Office and Decontamination Facilities and the Waste Management Plan which impacts the RFA efforts.

According to Section 9.4 of the FFA, a response is required within seven days of receipt of a request for time extension. To enable the Parties of the FFA to negotiate a project schedule which is the product of consensus to the maximum extent possible, I propose not to invoke Section 9.4 of the FFA for a period of 60 days from the date of this letter.

The Draft Detailed Project Schedule, which will be sent under separate cover within seven days of this letter, will define the lengths of the extensions for each project deliverable. A similar draft schedule has been presented and discussed during project managers meetings in September and November 1991.

If there are any questions concerning this correspondence, please contact me at (619) 532-3825.

S. E. TOWER
Commander, CEC, U.S. Navy
Head, Facilities Management Department
By direction of the Commanding Officer

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Enclosures

- (1) Revised FFA Attachment A dated 13 December 1991
- (2) Proposal for the FFA Schedule Extension dated 13 December 1991

Copy to:

Mr. John Hamill
Environmental Protection Agency
Region IX
~~75 Hawthorne Street~~
San Francisco, CA 94105

Mr. Manny Alonzo
California Department of
Toxic Substances Control
Region 4
245 West Broadway, Suite 350
Long Beach, CA 90802

Mr. Ken Williams
California Regional Water Quality Control Board
Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, CA 92507

Commandant of the Marine Corps
Headquarters, U.S. Marine Corps (LFL)
Washington, DC 20380-0001

Commanding General
Marine Corps Air Station
El Toro (Santa Ana), CA 92709-5001

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PROPOSED REVISED APPENDIX A

DELIVERABLE OR MILESTONE	ORIGINAL COMPLETION DATE	EXTENDED COMPLETION DATE*
<u>Operable Unit 1</u>		
Draft RI/FS Work Plan	30 Sep 90	N/A
Phase I Technical Memo	N/A	(in detail sched)
Phase I Testability Study and Draft Report	N/A	(in detail sched)
Draft Phase II Work Plan	N/A	(in detail sched)
Start Phase II Fieldwork	N/A	(in detail sched)
Draft RI Report	15 Jun 92	(in detail sched)
Draft FS Report	15 Aug 92	(in detail sched)
Draft Proposed Plan	15 Nov 92	(in detail sched)
Draft Record of Decision	15 Apr 93	(in detail sched)
<u>Operable Unit 2 and 3</u>		
Draft RI/FS Work Plan	30 Sep 90	N/A
Phase I Technical Memo	N/A	(in detail sched)
Phase I Feasibility Study and Draft Report	N/A	(in detail sched)
Draft Phase II Work Plan	N/A	(in detail sched)
Start Phase II Fieldwork	N/A	(in detail sched)
Draft RI Report	15 Oct 92	(in detail sched)
Draft FS Report	15 Feb 93	(in detail sched)
Draft Proposed Plan	15 May 93	(in detail sched)
Draft Record of Decision	15 Oct 93	(in detail sched)
<u>RCRA Facility Assessment (RFA)</u>		
Draft Report on Records Search, VSI & Sample Plan	15 Mar 91	N/A
Draft RFA Report	15 Dec 91	09 Sep 93
<u>Operable Unit 4</u>		
Draft RI/FS Work Plan	15 Dec 91	01 Feb 94
Draft RI Report	15 Sep 93	TBD
Draft FS Report	15 Jan 94	TBD
Draft Proposed Plan	15 Apr 94	TBD
Draft Record of Decision	15 Sep 94	TBD

* The extended completion dates are enforceable.

TBD: To Be Determined following approval of the RFA Report.

Enclosure (1)

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PROPOSAL FOR SCHEDULE EXTENSION

Marine Corps Air Station El Toro

References

- (a) Project Managers' Meeting at MCAS El Toro on 12 and 13 November 1991
- (b) Phone call between EPA Mr. Hamill/Navy Mr. Piszkin of 25 November 1991
- (c) Project Managers' Conference Call EPA Mr. Hamill/EPA (SAIC) Mr. Tindall/DTSC Mr. Broderick/Santa Ana Region Water Quality Control Board Mr. Williams/MCAS El Toro LCDR Serafini/MCAS El Toro Ms. Mitchell/Navy Mr. Piszkin of 11 December 1991

During references (a), (b), and (c), the conditions for the approval of the Navy's request for schedule extension were discussed. These conditions are summarized in the following paragraphs.

- (1) The Navy must establish enforceable interim deadlines for the RI/FS process such as Phase I Technical Memoranda and Phase II Draft Work Plan.

The Navy has proposed four interim milestones for Operable Units 1, 2, and 3 which are listed on the revised Attachment A. Those interim completion dates are enforceable.

- (2) For Operable Unit 1, the Navy must agree to implement a groundwater removal action prior to the signing of the Record of Decision.

The Navy and Marine Corps Air Station El Toro are currently in the process of framing a Memorandum of Agreement with the Orange County Water District (OCWD) on the OCWD Desalter Project that is scheduled to begin operations in November 1993.

- (3) The Navy should reduce the time period to complete the Draft ROD on all Operable Units by six months.

The Navy has reviewed the detailed project schedule and has determined that a six month reduction in the ROD schedule for all Operable Units is not practical. The original FFA milestones were negotiated prior to the

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completion of the Draft Final RI/FS Work Plan and Sampling and Analysis Plan (SAP) dated 28 February 1991. Since the FFA was negotiated, the scope of work has increased significantly. Between the SAP of September 1990 and the SAP of February 1991, the number of proposed monitoring wells increased from 95 to 126 and the total number of samples required increased from approximately 498 to 875. Additional increases in scope have occurred in developing the Site Office and Decontamination Facilities and the Waste Management Plan. The RFA which initiates Operable Unit 4, has identified 299 sites with 157 recommended for a sampling visit. With an increase in scope comes an increase in cost and time. The additional cost of work has a direct impact on the Navy's contract procurement process. When a contract's value becomes greater than \$5,000,000, Naval Facility Engineering Command (NAVFAC) Headquarters must approve all Pre-Business and Post Business Clearances; this extra approval process takes time and was not anticipated at the time the FFA was negotiated. The Navy's proposed extended schedule provides for the completion of the currently known level of effort and contractual requirements.

- (4) The Navy must complete a comprehensive scoping effort for all RCRA Facility Assessment (RFA) sites for the purpose of preparing a toxicological screening assessment for each site. Each site is to be classified as "high" risk, "low" risk, or "no" risk. After the RFA Report is completed, the milestone schedule of Operable Unit 4 will be negotiated.

The Draft RFA Report will include the classification of all RFA sites and recommendations for Operable Unit 4 sites. Following the approval of the RFA Report, an enforceable project schedule for Operable Unit 4 will be developed and incorporated into the Federal Facility Agreement.