



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

OILS.DS
M60050.000557
MCAS EL TORO
SSIC #5090.3

5090
Ser 06CC.DG/850
19 October, 2000

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)-3
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Kistner:

The 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, Site 1, (EOD Range), requires revised milestone deliverable dates for all primary documents. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request is made pursuant to Section 9.2 (g) of the FFA.

A previous extension request was submitted to the BCT on 04 January 2000 for Site 1, which has been operationally inactive since 02 July 1999. Responses were received back from both U.S. EPA and DTSC indicating that they did not concur, generally stating that the proposed timeline submitted could be expedited. As suggested, the topic was discussed at the next BCT meeting, held on 26 January 2000. At that time, the schedule was reviewed and the Navy further explained its rationale for the lengthy extension, citing steps such as UXO clearance and the Historical Radiological Assessment as key components in the timeline. During and after this period however, negotiations have been ongoing between the USMC and DTSC concerning past operations, the outcome of which could have an impact on not only the FFA schedule, but also the deliverable documents themselves.

Despite the above mentioned issues, in order to not lose time in the overall restoration process, work began on the development of the draft work plan for the site, which is currently under BCT review. At the 27 September 2000 BCT meeting, a revised draft schedule was discussed in an attempt to finalize the FFA scheduling issue. After soliciting and receiving feedback on this draft, modifications (significant time reductions) were made to the schedule, particularly in the post-RI phases. It was agreed upon at the 27 September 2000 BCT meeting that the Navy would revise the schedule, and transmit it back to the BCT (done on 05 October 2000) in preparation for a teleconference on 12 October 2000. DTSC and U.S. EPA were on the conference call, and the RWQCB was contacted the same day. All agencies were in agreement that the schedule as revised was reasonable and did not take exception to any of the deliverable dates. The more significant milestones are summarized below:

	<u>Start</u>	<u>Complete</u>
Draft Work Plan/SAP	20 Jul 00	13 Sep 00
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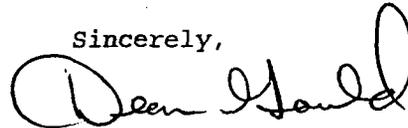
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In summary, we felt, and the BCT agreed, that work on the FS should not commence until the Draft Final RI was produced, that work on the PP should not proceed until the Draft FS was well underway and that initial drafting of the ROD should not begin until the Draft PP was finalized. As you can see, aggressive measures have been taken to parallel the document production process as much as possible, while still maintaining a high level of quality, without compromising any BCT review periods and maintaining the integrity of the public comment period. For comparison purposes, the Draft Rod delivery date is 11 months less than the September 2000 BCT meeting submission and 3 months less than the FFA extension submitted in January 2000. We believe it to be noteworthy that despite the time that has passed between 04 January 2000 and today, due to work completed to date and aggressive scheduling techniques, we are actually three months ahead of the original schedule submission.

With your concurrence, the deliverable date for the Draft Remedial investigation will be adjusted from 04 Jan 00 to 18 Feb 02, the Draft Feasibility Study from 11 Sep 00 to 06 Dec 02, the Draft Proposed Plan from 18 Apr 01 to 18 Mar 03 and the Draft Record of Decision from 14 Dec 01 to 23 Aug 03. 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



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NAVAL FACILITIES ENGINEERING COMMAND
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Ms. 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
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Broderick:

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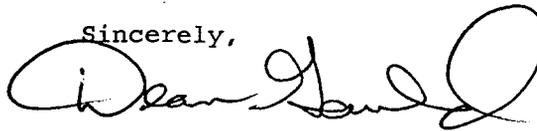
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DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

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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)-3
SITE 1, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Scandura:

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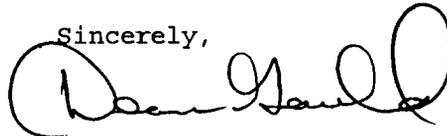
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DEAN GOULD
Base Realignment and Closure
Environmental Coordinator
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals

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Copy to: (w/encl)
Mr. John Scandura, DTSC
Mr. John Broderick, Cal RWQCB, Santa Ana Region

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

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<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	19 Feb 02	+25½ Months
Draft Feasibility Study	11 Sep 00	07 Dec 02	+27 Months
Draft Proposed Plan	18 Apr 01	19 Mar 03	+23 Months
Draft Record of Decision	14 Dec 01	26 Aug 03	+20 Months

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable, **Has not received formal BCT approval