



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

5090
Ser 06CC.DG/1028
December 15, 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)-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 milestone incorporated. This request will extend the deliverable date by 5 months, and is made pursuant to Section 9.2 (g) of the FFA.

As you are aware, public interest and involvement in the Historical Radiological Assessment (HRA) process remains very high. We continue to make presentations at each Restoration Advisory Board meeting, focusing on a different aspect of the process in order to better inform the public, and alleviate potential concerns. In the 15 March 2000 FFA extension request, elements of the HRA were discussed. The strategy at that time, was to put Sites 3&5 at the top of the list of sites to be surveyed, in order to minimize the delay. It was expected that the surveying of them would have started in September of 2000. As a result of numerous comments to respond to, and extended review periods, the Final HRA did not come out until May of 2000 however. The Draft Radiological Survey Plan was published in July 2000, with the Draft Final Radiological Survey Plan distributed in November of 2000. Review of this Final document is once again taking longer than anticipated. With our revised HRA schedule, we had hoped to commence survey work on 03 January 2001, but this too may be delayed up to two weeks, while reviews and comments are finalized.

With radiological survey work not commencing until mid-January, a modification is necessary in the priorities (order) of how the sites are to be surveyed. As briefed at the BCT meeting on 29 November 2000, due to California Gnatcatcher constraints in proximity to Sites 2&17, those sites will now need to go first. As indicated on the handout provided at the BCT meeting, Sites 3&5 would then follow. As a result of additional review time though, the expected start date of February 7, 2001 for survey work at site 2 has shifted to 28 February, 2001, with both Sites (3&5) expected to have their radiological surveys complete by 21 March, 2001.

The incorporation of these additional schedule changes into the overall schedule for the HRA effort is as follows:

Draft Final Survey Plan	Dec 2000
Final Survey Plan	Jan 2001
Field Work	Jan-Mar 2001
Draft Release Report	Apr 2001
Draft Final Release Report	Jun 2001
Final Release Report	Jul 2001

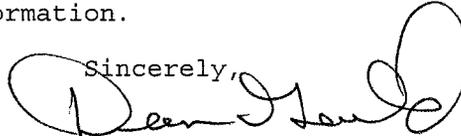
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As mentioned in the previous extension, it is hoped that with favorable survey results and BCT concurrence, issuance of the Final ROD prior to the Final Release Report can be achieved. Analysis, interpretation, and interim publication of the data will be required, after the survey is complete. It will then be incorporated into the ROD, for BCT concurrence. The ROD schedule can still 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	21 Mar 01
Survey results/final comments incorporated, sent to BCT	23 Apr 01
Final BCT review complete	07 May 01
Issuance of Final ROD	15 May 01

As a result of continued impact on the HRA effort, we request a 5-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 December 15, 2000 to 15 May 2001. 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. John Broderick, Cal RWQCB, Santa Ana Region

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	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 00	18 June 01	+6 Months**
 <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	18 June 01	+6 Months**
 <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>	<u>Change in 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	15 May 01	+5 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	22 Nov 00	
 <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	
Draft Feasibility Study	11 Sep 00	07 Dec 02	
Draft Proposed Plan	18 Apr 01	19 Mar 03	
Draft Record of Decision	14 Dec 01	26 Aug 03	

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable

** BCT Approval Pending