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MCAS EL TORO
SSIC # 5090.3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

OPTIONAL FORM 93 (7-89)

FAX TRANSMITTAL		# of Pages 2
To <i>Joseph Joyce</i>	From <i>Sam Acker</i>	
Dept/Agency <i>FBI</i>	Title <i>Asst Dir</i>	
Fax #	Fax #	
NSN 7540-01-317-7328		GENERAL SERVICES ADMINISTRATION

August 25, 1995

Joseph Joyce
BRAC Environmental Coordinator
Environment and Safety (Code 1AU)
MCAS El Toro
P.O. Box 95001
Santa Ana, CA -92709-5001

Dear Mr. Joyce:

EPA received notice the week of August 14, 1995 that CPT, soil gas testing and hydropunch sampling were scheduled for the week of August 21, 1995. This is alarming because the draft Final Phase II RI/FS Workplan (WP), and Quality Assurance Project Plan (QAPP) have not been approved yet, and the draft final Phase II Field Sampling Plan (FSP) has not been received in our office. Over the past month I have expressed our willingness to review these documents on an expedited schedule in order to expedite field activities. The Navy project managers and contractors did not inform us of your intent to start fieldwork prior to the regulatory agencies providing approval/concurrence.

Section 18.4 of the MCAS El Toro Federal Facilities Agreement (FFA), signed by all parties in October 1990, stipulates that the "authority of the Project Managers shall include, but is not limited to (a) taking samples and ensuring that sampling and other field work is performed in accordance with the terms of any final work plan and QAPP." As the QAPP and WP are not final yet and the FSP has not been received, EPA is not able to provide these oversight responsibilities.

The El Toro team has expended much time over the past year planning and providing guidance to the Navy's contractors regarding the Operable Unit II and III Phase II WP, FSP and resulting fieldwork. Initiating fieldwork without regulatory approval does not permit the regulatory agencies to fulfill their responsibilities cited above under the FFA nor does it foster the team spirit which we have all been working toward. The fieldwork initiated without approval is subject to possible changes and/or possible data quality problems. For example, if the regulatory agencies do not concur with proposed boring locations, additional borings may be required. EPA will continue to review the draft final WP and QAPP. We look forward to receiving the draft final

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FSP. If you have any questions, I can be reached at 415/744-2468.

Sincerely,



Bonnie Arthur
Remedial Project Manager
Federal Facilities Cleanup Office

cc: Mr. Juan Jimenez, DTSC
Mr. Larry Vitale, RWQCB
Mr. Jason Ashman, SW DIV
Mr. Dante Tedaldi, Bachtel