



UNITED STATES MARINE CORPS

HEADQUARTERS MARINE CORPS AIR STATION EL TORO
PO BOX 95000
SANTA ANA CA 92709-5000

IN REPLY REFER TO:

Cert. No. P115386888
6284
1AU
18 Sep 97

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
Region IX
Attn: Mr. Glenn R. Kistner
Remedial Project Manager
Hazardous Waste Management Division. (SFD 8-2)
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Kistner:

This letter is to request a change to the Federal Facility Agreement (FFA) submittal date for the Marine Corps Air Station (MCAS) El Toro Draft Final Interim Record of Decision (ROD) for Operable Unit (OU) 2A (Site 24 vadose zone). Enclosure (1), Appendix A, presents the new proposed FFA document submittal date.

Our request for a revised submittal date is due to the recent resolution of significant legal regulatory comments associated with the OU2A (Site 24 vadose zone) Draft Final Interim ROD as discussed in enclosure (2). We request the new submittal date be extended five calendar days from September 19, 1997 to September 24, 1997. Good cause exists for an extension of the schedule pursuant to Section 9.2(g) of the FFA. Enclosure (2), a letter dated September 18, 1997, from the Department of the Navy (DoN) to U.S. Environmental Protection Agency (USEPA) and State Water Resources Control Board (SWRCB), is an example of DoN's continued commitment to fast-track remediation through partnership with our regulatory team members. No other related OU2A (Site 24 vadose zone) timetables or schedules would be affected if this extension were granted.

If you have any questions, or need additional information concerning this request, please call me at (714) 726-3470.

Sincerely,

JOSEPH JOYCE
Base Realignment and Closure
Environmental Coordinator
By direction of
the Commanding General

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Encl:

(1) Appendix A FFA Schedule of Submittals

(2) DoN letter to USEPA and SWRCB

Copy to:

John Scandura, DTSC

Larry Vitale, Santa Ana RWQCB

APPENDIX A
MCAS El Toro Schedule
(Page 1 of 2)

<u>Operable Unit (OU)-1: Site 18</u>	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
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Draft Proposed Plan	18 Dec 95	No Change	
re-Draft Proposed Plan*	1 Oct 97*	No Change	
Draft Interim Record of Decision	23 Mar 98	No Change	
 <u>OU-2A: Site 24 (Vadose Zone)</u>			
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Draft Phase II Work Plan	20 Mar 95	No Change	
Start Phase II Field Work	20 Jul 95	No Change	
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Draft Proposed Plan	11 Mar 97	No Change	
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DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
COUNSEL FOR SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY RM 250
SAN DIEGO, CALIFORNIA 92132-5189

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Thelma Estrada, Esq.
Mail Code RC-3-4
Office of Regional Counsel
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Frances McChesney, Esq.
Senior Staff Counsel
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: MARINE CORPS AIR STATION (MCAS) EL TORO INTERIM RECORD OF
DECISION (ROD), OPERABLE UNIT 2A, SITE 24 VOC SOURCE AREA

Dear Ms. Estrada and Ms. McChesney:

The following language was discussed in our conference call on Monday, September 15, 1997. It modifies the language included in Ms. McChesney's letter of September 10, 1997. This language would be inserted at the end of Section 10.2.1.1 of the draft final ROD:

"The Regional Water Quality Control Board alone does not agree that the method and criteria used for determining "threshold concentrations" for shutoff of the SVE system complies with State Water Resources Control Board Resolution No. 92-49 or with Title 23, California Code of Regulations, Section 2550.4 or Title 22, California Code of Regulations, Section 66264.94. It is the Board's position that the use of a 40-foot mixing zone and a point of compliance in the ground water and other assumptions used in setting "threshold concentrations" will not necessarily result in cleanup of the vadose zone to the extent technically and economically achievable and at least to a level that assures that contaminants will not discharge into ground water at levels greater than the aquifer cleanup levels for the underlying ground water. However, the Marine Corps has agreed to reevaluate the shutoff criteria for Site 24 in the final ROD for Site 24. Therefore, the Regional Water Quality Control Board will not dispute this Interim ROD."

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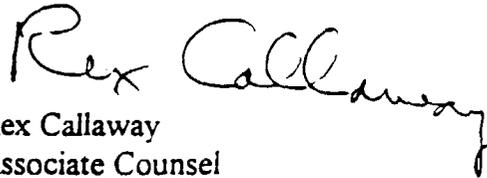
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2. Delete the third sentence of the second paragraph under the heading "Relationship between Groundwater and Vadose Zone" in Section 10.2.1.1 and delete the point of compliance reference in Figure 5-1.

I appreciate your cooperation with our tight deadline. Please let me know if you have any further comments or questions.

Sincerely,



Rex Callaway
Associate Counsel
(Environmental)

Copy to:
Wayne Lee, COMCABWEST
Maj. Tim Evans, USMC WACO



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California Environmental Protection Agency
Department of Toxic Substances Control, Region 4
Attn: Mr. John Scandura
Chief Office of Military Facilities
Southern California Operations
245 West Broadway, Suite 350
Long Beach, CA 90802-4444

Dear Mr. Scandura:

This letter is to request a change to the Federal Facility Agreement (FFA) submittal date for the Marine Corps Air Station (MCAS) El Toro Draft Final Interim Record of Decision (ROD) for Operable Unit (OU) 2A (Site 24 vadose zone). Enclosure (1), Appendix A, presents the new proposed FFA document submittal date.

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ANDY ROSEN

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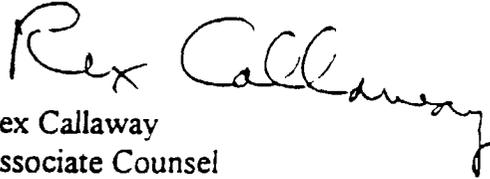
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California Regional Water Quality Control Board
Santa Ana Region
Attn: Mr. Larry Vitale
Remedial Project Manager
3737 Main Street, Suite 500
Riverside, CA 92501-3339

Dear Mr. Vitale:

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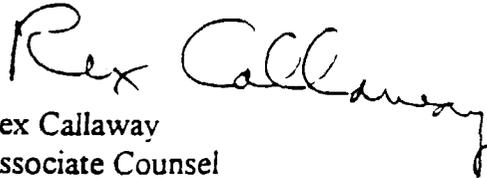
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