



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

M60050.002427
MCAS EL TORO
SSIC #5090.3

5090
Ser 06CC.DG/0523
May 23, 2001

Ms. Nicole Moutoux
U. S. Environmental Protection Agency
Region IX, (SFD 8-2)
Hazardous Waste management Division
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Ms. Moutoux:

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-3
(SITE 16), MARINE CORPS AIR STATION (MCAS) EL TORO

This letter is written to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3, Site 16, (Crash Crew Pit #2), requires revised milestone deliverable dates for the Draft Proposed Plan and Draft Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable dates for both the Draft Proposed Plan and Draft Record of Decision by 3 weeks each, and is made pursuant to Section 9.2 (g) of the FFA.

From the time of the last schedule extension request (17 January 2001), yet more significant work has taken place. The BCT through discussion and receipt of a number of documents has been regularly notified of site status. The actions completed since the last extension request are summarized below:

- 19 March - Draft Technical Memorandum for the MPE Pilot Study at Site 16 was submitted to the BCT. Memorandum includes results of initial pilot study activities and extended operation through 27 December 2000.
- 21 March - Navy presented an update on the pilot study progress, mass removal update, and discharge of treated groundwater at the BCT meeting.
- 27 March - Navy submitted the rebound testing protocol and post-pilot study sampling activities to the BCT.
- 10 April - Navy submitted the Post Pilot Testing Rebound Rationale for IRP Site 16 to the BCT.
- 4-12 April - Navy conducted rebound testing following the protocol presented on the 27 March 2001.
- 12-20 April - Post-pilot study sampling was conducted and results will be compared to the sampling conducted prior to the pilot-study.
- 18 May- Strategy and Rationale for Remedy Selection at IRP Site 16 document sent to the BCT.

As illustrated by the above events, significant progress continues to be made and the flow of communication amongst the BCT members remains very good. It was mentioned in the previous extension request, that while the activity of significant source area removal by way of the pilot test may take more up-front time, the end result would be a net positive from a time,

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cost and restoration perspective. As a result, the Draft Final FS and follow-on documents will need to reflect the results of the pilot test, which we hope to be a primary focus on the groundwater issues at the site. The integrity of the Public Participation process will, of course, remain intact. Specific rationale for this extension request includes:

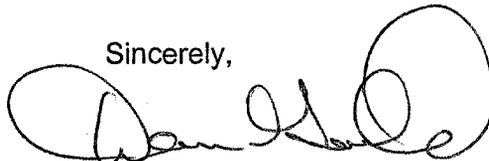
- (1) The MPE pilot study was extended further than originally scheduled. The original completion date of the pilot study (including all rebound tests) was 31 March 2001. The rebound testing activities were actually extended into late April.
- (2) The extension of the pilot study has resulted in a delay in incorporating the rebound test results into the Draft Final FS.
- (3) The Technical Memorandum prepared for the pilot study was an extensive document that included information through 27 December 2001. The original intent for this document was to present the two-week pilot study results, but was expanded to include the extended pilot study results.

As the BCT is aware, the pilot test has been extremely successful in the removal of soil contamination. With this knowledge, and the other positive aspects as mentioned above, we trust that the BCT will remain supportive of this method and endorse this extension request. A much more detailed schedule of remaining steps is provided as enclosure (2). In order to minimize the time impacts of this and previous extension requests, the schedule reflects the following steps:

- (1) Initiated preparation of the Draft Final FS (including modeling) concurrent with the pilot study activities, decreasing the time required to finish the FS.
- (2) Preparing the Draft Proposed Plan so that it and the Draft Final can be submitted at the same time.

Based on the strategies described, an extension of approximately 3 weeks is required for submittal of the Draft PP (18 June 01 vice 23 May 01). Similarly, an additional 3 weeks is required for submittal of the Draft ROD (30 November 01 vice 09 November 01). We feel that this approach continues to present an aggressive yet obtainable approach to Site 16. 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

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Enclosure: 1. Appendix A FFA Schedule of Submittals
2. Extended schedule for Site 16

Copy to: (w/encl)
Ms. Patricia Hannon, RWQCB
Mr. John Scandura, California EPA

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	15 May 01	28 Nov 01**	+6 Mos, 2 Wks
 <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	15 May 01	28 Nov 01**	+6 Mos, 2 Wks
 <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	

PROPOSED SCHEDULE FOR FS/PP/ROD AT SITE 16

1. Prepare Draft FS Report	9/13/99A	1/24/00A
2. Issue FS to SWDIV for over the shoulder review		1/24/00A
3. SWDIV Review	1/24/00A	1/31/00A
4. Revise Draft FS Report per SWDIV comments	2/1/00A	2/8/00A
5. Issue Draft FS Report to SWDIV/Agency		2/17/00A
6. SWDIV/Agency Review of Draft FS Report	2/17/00A	4/17/00A
7. Incorporate/Respond to SWDIV/Agency Comments	4/17/00A	11/29/00
8. Prepare Draft MPE Pilot Study WP	3/6/00A	5/21/00A
9. Issue WP to SWDIV for over the shoulder review		5/22/00A
10. SWDIV review	5/22/00A	6/2/00A
11. Revise Draft WP per SWDIV comments	6/5/00A	6/9/00A
12. Issue Draft WP to SWDIV/Agency		6/12/00A
13. SWDIV/Agency Review of Draft WP Report	6/12/00A	7/11/00A
14. Incorporate/Respond to SWDIV/Agency Comments	7/11/00A	7/26/00A
15. Issue Final WP to SWDIV/Agency		7/26/00A
16. MPE Pilot Testing	7/31/00A	4/20/01A
17. Prepare Draft Technical Memo for MPE Pilot Study	12/18/00A	2/12/00A
18. Issue Draft Tech Memo for SWDIV Review	02/12/01A	02/20/01A
19. Revise Draft Tech Memo per SWDIV Comments	02/20/01A	03/19/01A
20. Issue Draft Tech Memo to SWDIV/Agency		03/19/01A
21. Prepare Draft Final FS Report	03/20/01A	05/24/01
22. Issue Draft Final FS Report for SWDIV Review	05/24/01	06/01/01
23. Revise Draft Final FS Report per SWDIV Comments	06/01/01	06/18/01
24. Issue Draft Final FS Report to SWDIV/Agency		06/18/01
25. SWDIV/Agency Review of Draft Final FS Report	6/18/01	08/17/01
26. Prepare Final FS Report	08/20/01	09/10/01
27. Issue Final FS Report for SWDIV Review	09/10/01	09/17/01
28. Revise Final FS Report per SWDIV Comments	09/17/01	10/01/01
29. Issue Final FS Report to SWDIV/Agency		10/01/01
30. Prepare/Issue 1 st Working Draft Proposed Plan	10/01/00A	05/17/01
31. SWDIV Review (2 weeks)	5/17/01	05/22/01
32. Incorporate comments/Issue 2 nd Working Draft PP	05/22/01	06/04/01
33. SWDIV Review (4 work days)	06/05/01	06/08/01
34. Incorporate SWDIV comments (1 week)	06/09/01	06/18/01
35. Issue Draft PP (Not Current FFA Date)		06/18/01
36. BCT-regulator review of Draft PP (60 days)	06/18/01	08/17/01
37. Incorp. reg. Comments (10 calendar days)	08/18/01	08/28/01
38. Issue pre-Draft Final PP to SWDIV		08/28/01
39. SWDIV Review (3 work days)	08/28/01	08/30/01
40. Incorp. SWDIV comments (1 week)	08/31/01	09/06/01
41. Issue Draft Final PP to BCT		09/06/01
42. Regulator rvw of Draft Final PP (assume 15 days)	09/06/01	09/21/01
43. Incorp. reg. Cmts (3 work days)	09/22/01	09/27/01
44. Issue Final PP for SWDIV app.		09/27/01
45. Receive Approval/Print Proposed Plan	09/27/01	10/04/01
46. Public Comment Period (minimum 30 days)	10/09/01	11/09/01
47. Public Meeting (held mid-point of comment period)		10/24/01
48. Prepare Draft ROD	04/17/01A	07/13/01
49. Issue to SWDIV for Over-the-Shoulder review		07/13/01
50. SWDIV Review (4 weeks)	07/13/01	08/13/01
51. Update AR index	04/30/01	08/13/01
52. Revise Draft ROD per SWDIV comments (3 weeks)	08/13/01	09/03/01
53. Prepare Responsiveness Summary (3 weeks)	11/09/01	11/30/01
54. Issue RS to SWDIV for over-the-shoulder review		11/30/01
55. SWDIV review of RS (2 weeks)	11/30/01	12/14/01
56. Revise RS per SWDIV comments (2 weeks)	12/14/01	12/28/01
57. Issue Draft ROD (Not FFA Date)		11/30/01
58. Issue Draft RS		12/28/01
59. Agency Review of Draft ROD and RS (8 weeks)	11/30/01	01/30/02
60. Incorporate agency comments on ROD/RS (4 wk)	01/30/02	02/27/02
61. Issue Draft Final ROD to SWDIV for review		02/27/02
62. SWDIV review (2 weeks)	02/27/02	03/13/02
63. Incorporate SWDIV comments (2 weeks)	03/13/01	03/27/02
64. Issue Draft Final ROD to regulatory agencies		03/27/02
65. Provide Post ROD support	03/27/02	04/30/02
66. ROD signed		04/30/02
67. Prepare and issue public notice (2 weeks after ROD signed)	05/01/02	05/15/02