



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

M60050.002576  
MCAS EL TORO  
SSIC #5090.3

5090  
Ser 06CC.DG/1203  
November 14, 2001

Ms. Triss Chesney  
California Environmental Protection Agency  
Department of Toxic Substances Control  
5796 Corporate Avenue  
Cypress, CA 90630-4700

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Chesney:

This letter is submitted 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 3 months, and is made pursuant to Section 9.2 (g) of the FFA.

The May 15, 2001 FFA extension request that was agreed upon, projected a November 14, 2001 date for the issuance of the Draft Final ROD. This was primarily contingent upon the scheduled completion (September 14, 2001) of the Radiological Survey, and on the premise that follow on sampling/investigation would not be required. Finalizing discussions with the USFWS resulted in survey work starting one week later than previously projected; June 18 vice June 11, 2001. Also, there was additional time needed to complete the overall survey due to particular sites such as 2 & 17, where surveying in the rugged terrain (by foot vice tractor) was more time consuming than originally estimated.

As promised in the previous extension request though, Sites 3 & 5 were the first to be surveyed, with work complete July 05, 2001, as indicated in enclosure (2). As further indicated in enclosure (2), you can see that all survey work has been completed for the Base, and the contractor has demobilized. This survey work was witnessed by the BCT at the July 25, 2001 meeting. Please note however, line 15 of enclosure (2). It indicates the time needed to conduct soil sampling (2 weeks) that had not originally been estimated. In total, 189 soil samples were taken at various sites. Specific to Sites 3 & 5, the table below of sampling data applies.

Site	Anomalies	Number of samples
IR-3	1	22
IR-5/APHO-46	1	5
Anomaly Area 3	0	1

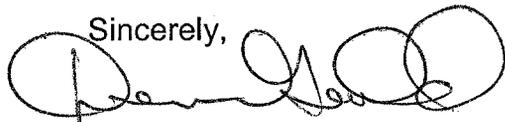
Referring to enclosure (3), you will see a projected timeline to receive and evaluate the lab results of the sampling, as well as publish and issue to the regulators the Draft Release Report (DRR). Looking at line 12 of the enclosure, this date is reflected as February 15, 2002.

Utilizing the same strategy as proposed in the previous extension request in order to expedite remedy implementation, we propose to issue the Draft Final ROD for Sites 3 & 5 concurrent with the DRR for MCAS El Toro. Both documents would have a 30-day review period. We understand with the introduction of the sampling data, more than a 30-day review period for the DRR may be required. As has been previously discussed with the BCT, we are also working with our contractor to develop an appropriate strategy for properly addressing Anomaly Area 3, APHO 46 and MSCR 2, and their incorporation into the DRAFT Final ROD. We plan to solicit input from the BCT for their ideas as to how to most effectively and appropriately, incorporate these related areas to the ROD for Sites 3 & 5. We also feel, that a 30-day review period is appropriate for the Draft Final ROD in this instance given; the time elapsed since the issuance of the original Draft, the time needed to review the incorporation of the results of the DRR, and time to review how Anomaly Area 3, APHO 46 and MSCR 2 are being addressed.

Taking into account all of the above, the following schedule is proposed for OU-2C:

Issue MCAS El Toro DRR	15 Feb 02
Issuance of Draft Final ROD	15 Feb 02

As a result of the various issues described, we request a 3-month extension to submit the Draft Final ROD for OU-2C. The proposed date for submitting a new Draft Final ROD would change from November 14, 2001 to February 15, 2002. Thank you in advance for your support, and please call me at (619) 532-0765 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
  2. Radiological Survey Work Complete to Date
  3. Radiological Survey Remaining Schedule

Copy to: (w/encl)  
Mr. John Scandura, DTSC  
Ms. Patricia Hannon, RWQCB  
Ms. Nicole Moutoux, U.S. EPA



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SOUTHWEST DIVISION  
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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)-2C.  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Scandura:

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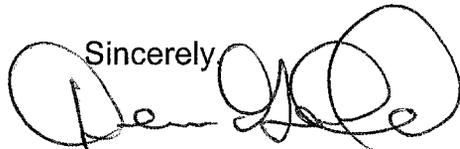
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Utilizing the same strategy as proposed in the previous extension request in order to expedite remedy implementation, we propose to issue the Draft Final ROD for Sites 3 & 5 concurrent with the DRR for MCAS EI Toro. Both documents would have a 30-day review period. We understand with the introduction of the sampling data, more than a 30-day review period for the DRR may be required. As has been previously discussed with the BCT, we are also working with our contractor to develop an appropriate strategy for properly addressing Anomaly Area 3, APHO 46 and MSCR 2, and their incorporation into the DRAFT Final ROD. We plan to solicit input from the BCT for their ideas as to how to most effectively and appropriately, incorporate these related areas to the ROD for Sites 3 & 5. We also feel, that a 30-day review period is appropriate for the Draft Final ROD in this instance given; the time elapsed since the issuance of the original Draft, the time needed to review the incorporation of the results of the DRR, and time to review how Anomaly Area 3, APHO 46 and MSCR 2 are being addressed.

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

Enclosure: 1. Appendix A FFA Schedule of Submittals  
2. Radiological Survey Work Complete to Date  
3. Radiological Survey Remaining Schedule

Copy to: (w/encl)

Ms. Patricia Hannon, RWQCB

Ms. Nicole Moutoux, U.S. EPA

Ms. Triss Chesney, DTSC



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November 14, 2001

Ms. Patricia Hannon  
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)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Ms. Hannon:

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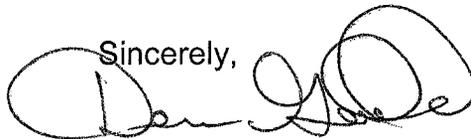
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Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

Enclosure: 1. Appendix A FFA Schedule of Submittals  
2. Radiological Survey Work Complete to Date  
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Ms. Nicole Moutoux, U.S. EPA  
Ms. Triss Chesney, DTSC



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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

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-2C  
SITES 3 AND 5, MARINE CORPS AIR STATION (MCAS) EL TORO

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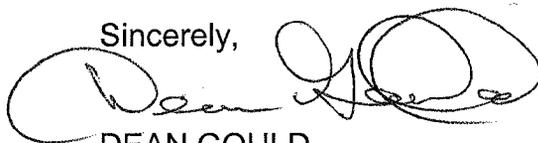
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Base Realignment and Closure  
Environmental Coordinator  
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Enclosure: 1. Appendix A FFA Schedule of Submittals  
2. Radiological Survey Work Complete to Date  
3. Radiological Survey Remaining Schedule

Copy to: (w/encl)  
Mr. John Scandura, DTSC  
Ms. Patricia Hannon, RWQCB  
Ms. Triss Chesney, DTSC

## 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 <sup>rd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	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 <sup>nd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	09 Jan 02	No Change	
 <u>OU-2B: Sites 2 &amp; 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>	Change in <u>Dates</u>
<u>OU-2B: Sites 2 &amp; 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 &amp; 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	14 Nov 01	15 Feb 02	+3 Months
<u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 &amp; 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, &amp; 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 &amp; 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	22 Nov 00	No Change	
<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	23 May 01	No Change	
Draft Record of Decision	30 Nov 01	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	19 Feb 02	No Change	
Draft Feasibility Study	07 Dec 02	No Change	
Draft Proposed Plan	19 Mar 03	No Change	
Draft Record of Decision	26 Aug 03	No Change	

This schedule reflects current/proposed FFA milestones.

\* Not an enforceable FFA deliverable

**PROPOSED PRIORITIES FOR THE RADIOLOGICAL SURVEY - MCAS EL TORO (11/14/01)**

<b>Priority</b>	<b>Survey Location</b>	<b>Survey Duration (days)</b>	<b>Approximate Survey Dates (6 days per week)</b>	<b>Actual Survey Date(s)</b>	<b>Schedule Driver</b>
1	IRP Site 3 - Original Landfill	9	June 18 - 27, 01	June 18-29, 01 (survey complete)	Final ROD on hold pending results of Rad Survey
2	IRP Site 5 - Perimeter Road Landfill including APHO 46	6	June 28 - July 5, 01	June 30-July 5, 01 (survey complete)	Final ROD on hold pending results of Rad Survey
3	IRP Site 8 - DRMO Storage Yard 1	4	July 6 - 10, 01	July 12-17, 01(est. survey complete)	Final ROD on hold pending results of Rad. Survey
4	IRP Site 12 - Former IWT Plant including the out-fall to Bee Canyon Wash (Part 1 IRP Site 25)	2.5	July 11 - 13, 01	July 23-27, 01(est. survey complete)	Final ROD on hold pending results of Rad. Survey
5	DRMO Storage Yard 3	2.5	July 13 - 16, 01	July 10-11, 01 (survey complete)	
6	Anomaly Area #3	5	July 17 - 20, and July 23, 01	Jul 30-Aug 4, 01 (survey complete)	
7	Suspected Former Site of Radium Plaque Adaptometer Building	1	July 21, 01 (Saturday)	June 23, 01 (survey complete)	
8	Nuclear Biological and Chemical Buildings 787, 1789, and 1803	2.5 - buildings	July 24 - 26, 01	Aug 6-8, (compl)	
8a	Outdoors - APHO-38 and adjacent NBC grounds	1-(APHO 38) 2-(adj. NBC grounds)	July 27, 01 July 28 - 30, 01 (GPS Survey)	July 6-9, 01 (out-door survey complete)	
9	Hangar Building 295	2	July 31 - Aug 1, 01	Aug 9-13 (compl)	
10	Command Museum Buildings 242, 243 and 244	3	Aug 2 - 4, 01	Aug-14-17(comp)	
10a	Aircraft Parts Yard adjacent to Building 242	1 -(Parts Yard)	Aug 6, 01 (GPS Survey)	July 28, 01(comp)	
11	IRP Site 1 - Explosive Ordnance Disposal Range	7.5	Aug 7 - 16, 01	UXO sweep complete. Rad survey, Sep 19, 01 (complete)	Include results in Remedial Investigation. Habitat for the California gnatcatcher. Gnatcatcher breeding season late February. USFWS approval in progress.
12	IRP Site 2 - Magazine Road Landfill	20	Aug 17 - Sept 3, 01	Aug 18-Sep 12, (compl) includes 1½ non-work days; Aug 24/25	Habitat for the California gnatcatcher. Gnatcatcher breeding season late February. USFWS approval in progress.
13	IRP Site 17 - Communications Station Landfill including APHO 44	15	Sept 4 - 14, 01	Sep. 20-Oct. 2, 01 (complete)	Habitat for the California gnatcatcher. Gnatcatcher breeding season late February. USFWS approval in progress.
14	DRMO Buildings 319 and 360	4	Sept 14 - 18, 01 (if required)	Oct -26-Nov. 05 (complete)	
15	Soil sampling	N/A	N/A	Oct 3-17, 01 (complete)	
16	Demobilization	N/A	N/A	Nov. 9-10, 01 (complete)	

(END. 2)

