



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

M60050.002600
MCAS EL TORO
SSIC NO. 5090.3

5090
Ser 06CC.DG/1250
November 28, 2001

Ms. Triss Chesney
Department of Toxic Substances Control
Southern California Office of Military Facilities
5796 Corporate Avenue
Cypress, CA 90630

Dear Ms. Chesney:

Subj: FEDERAL FACILITIES 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 Facilities Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) -3, Site 16, (Crash Crew Pit No. 2), requires revised milestone deliverable dates for the Draft Record of Decision, based on confirmation soil vapor sampling to be conducted at the site and a requested 30-day extension for review of the Draft Final Feasibility Study. Enclosure (1) presents our FFA schedule with the revised primary milestones included. This request will extend the deliverable date for the Draft Record of Decision by six months, and is made pursuant to Sections 9.2 (d) and (g) of the FFA.

From the time of the last schedule extension request (23 May 2001), noteworthy progress has been made in the CERCLA process for Site 16. The actions that have been conducted have been presented to the BCT at several meetings and telephone conferences. The events completed since the last extension request include:

- 15 June - Draft Final Focused Feasibility Study and Draft Proposed Plan were submitted to the BCT. The documents incorporate the results from the MPE pilot study activities. The Proposed Plan identified institutional controls and groundwater monitoring as the preferred alternative.
- 16 Aug. - EPA submitted a request for a 30-day extension for submittal of comments on the Draft Final focused Feasibility Study.
- 14 Sept. - BCT comment submitted on the Draft Final Focused Feasibility Study and Draft Proposed Plan.
- 19 Sept. - Navy discussed conducting confirmation soil vapor sampling at Site 16 to address comments submitted by the BCT. BCT agreed with the approach of conducting additional sampling.
- 17 Oct.- Navy participated in a conference call with BCT to discuss the approach and scheduling for the confirmation soil vapor sampling and preparation of the Final Feasibility Study.

As indicated, although there are challenging issues, we continue to make progress on Site 16 and keep the BCT members involved in the process through frequent meetings. The Navy anticipates working closely with the BCT to perform the confirmation soil vapor sampling and work on resolving the remaining issues presented in the BCT comments.

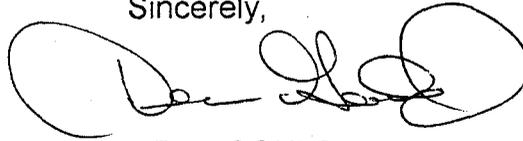
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The requested extension is necessary to account for the 30-day extension requested for the review of the Draft Final Feasibility Study and the preparation and implementation of the confirmation soil vapor sampling. We believe these activities to be acceptable causes for extensions per the FFA, Section 9.2. The specific language in the FFA for acceptable causes for delay include:

- (1) Section 9.2 (d): "A delay caused, or which is likely to be caused by an extension (including without limitation an extension under subsection 7.7)..."
- (2) Section 9.2 (g): "Any other event or series of events mutually agreed to by the Parties as constituting good cause."

With the BCT working together on resolving any remaining issues for Site 16, we anticipate an expedient completion of the required CERCLA documentation including the Record of Decision. Provided for your use is a detailed schedule of remaining steps provided as enclosure (2). Based on the information provided, an extension of approximately 6 months is required for the submittal of the Draft ROD (3 June 2002 vice 30 November 2001). We feel that by conducting the additional testing and addressing BCT comments, we will effectively meet the requirements for Site 16. 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. Extended schedule for Site 16

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

**ENCLOSURE (1)
APPENDIX A FEDERAL FACILITIES AGREEMENT
SCHEDULE OF SUBMITTALS**

**REQUEST FOR EXTENSION TO FEDERAL
FACILITIES AGREEMENT FOR THE DRAFT
RECORD OF DECISION FOR THE CRASH CREW
PIT NO. 2**

**THE ABOVE IDENTIFIED ENCLOSURE
IS NOT AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED
BY SOUTHWEST DIVISION TO LOCATE THIS
ENCLOSURE. THIS PAGE HAS BEEN INSERTED
AS A PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676

**ENCLOSURE (2)
EXTENDED SCHEDULE FOR SITE 16**

**REQUEST FOR EXTENSION TO FEDERAL
FACILITIES AGREEMENT FOR THE DRAFT
RECORD OF DECISION FOR THE CRASH CREW
PIT NO. 2**

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