



UNITED STATES MARINE CORPS

HEADQUARTERS MARINE CORPS AIR STATION EL TORO

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SANTA ANA CA 92709-5001

M60050.002720

MCAS EL TORO

SSIC #5090.3

IN REPLY REFER TO:

Cert. No. P115386420

6284

1AU

23 Mar 99

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 MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU) 1 and 2A (Sites 18 and 24, respectively) require a revised milestone deliverable date for the draft final Proposed Plan for Groundwater Remediation. This extension request is made pursuant to Section 9.2 (g) of the FFA.

As you are aware, the preferred remedy for groundwater remediation at Sites 18 and 24 is tied to the proposed settlement agreement with the Orange County Water District and the Irvine Ranch Water District (OCWD/IRWD), making this document quite extensive and complex for a Proposed Plan. A variety of technical and legal issues must be balanced carefully, to support the presentation to the public for review and comment.

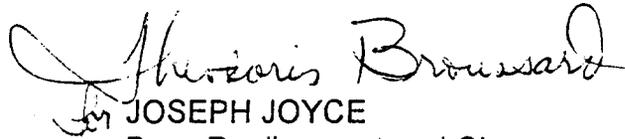
Additionally, significant comments were received from the regulatory agencies. More than a few comments require resolution, versus simple incorporation into the draft final Proposed Plan. For example, concerning our preferred remedy, we state that the VOC "pre-treatment" plant at Site 24 is not a component of the CERCLA remedial action. DTSC considers the pre-treatment as part of the treatment process and the CERCLA remedy that must comply with ARARs. This is a critical issue that must be resolved prior to issuing a draft final document. There are other less crucial (but nonetheless important) issues that should be resolved with the agencies before we can issue a quality draft final Proposed Plan.

We request a six-week extension to the draft final Proposed Plan submittal. No other OU 1 or 2A submittals will be impacted by this request. The proposed new submittal date would change from April 1, 1999 to May 13, 1999. This new date is reasonable given the complexity and high resource requirement associated with the MCAS El Toro Installation Restoration Program.

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Please call me at (949) 726-3470 if you have any questions or need additional information.

Sincerely,


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

Copy to:
Mr. John Scandura, Cal EPA, Region 4
Ms. Patricia Hannon, RWQCB, Santa Ana Region