



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

5090
Ser 06CC.DG/1025
15 December, 2000

Mr. John Broderick
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)-1
(SITES 18), AND (OU)-2A (SITE 24), MARINE CORPS AIR STATION (MCAS)
EL TORO

Dear Mr. Broderick:

The purpose of this letter is to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Units (OU)-1 and (OU)-2A require a revised milestone deliverable date for the Draft Record of Decision, as discussed in a BCT conference call on 14 December, 2000. Enclosure (1) presents our FFA schedule with the revised primary milestone incorporated. This request will extend the deliverable date for the Draft Record of Decision by six months, and is made pursuant to Section 9.2 (g) of the FFA.

The 21 July, 2000 extension request outlined the need for additional time primarily as a result of a new target date for the conclusion of Desalter settlement negotiations and completion of the settlement agreement. The target date at the time was 01 September 2000 for concluding the negotiations. New issues were also brought to the forefront by the Water Districts, notably MTBE and radionuclides. The MTBE issue is now adequately addressed in the settlement document, and we are working jointly with the Water Districts to perform a second round of radionuclide sampling, which we expect to begin in January 2001. Performance of the radionuclide sampling round is not expected to impact the settlement negotiation schedule.

From the time of the last extension there has been significant progress on both the CERCLA and settlement sides. The "Preliminary Draft Final Proposed Plan", which was provided as the FFA primary deliverable, was submitted to the BCT on 11 August 2000, and commented upon. With only settlement agreement language not included in it, the BCT has now reviewed the vast majority of what will ultimately be the Draft Final PP. With this in mind, and as discussed in the 14 December 2000 conference call, BCT review time of this document can be significantly shortened, and is conservatively proposed as 2 weeks for planning purposes. As further discussed in the conference call, the number of issues remaining to be resolved for the settlement agreement continues to shorten, with very few remaining. These will be outlined in a letter from the DOJ to the Water Districts that is to be sent by the date of this letter. The significant reconfiguration of the system by the Water Districts has also almost been completely incorporated. It is hoped that the Water Districts will then be able to present the settlement agreement to their respective Boards, by their January meeting dates. One month is then planned to finalize any issues brought up by the Boards, prior to the document being sent up the DOJ chain of command for final approval. Based on past performance, and staffing uncertainties within DOJ as a result of a change in the Administration, one and a half months are planned for this stage.

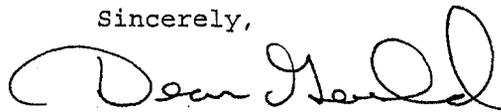
Applying the settlement steps that remain to dates, the Water Districts should have met with their Boards by 16 January 2001. One month to finalize issues and smooth the document takes the schedule to 16 February 2001. Water District signature on the settlement will also need to be obtained during this time. The DOJ will then forward the document for final approval, which will go up to 30 March. From that point the CERCLA specific schedule below applies.

<u>Activity</u>	<u>Action Complete Date</u>
Issue Draft Final PP	06 April 2001
BCT Review of DF PP	20 April 2001
Print PP	11 May 2001
Public Comment Period	11 June 2001
Public Meeting	29 May 2001 (tentative)
Issue Draft ROD	18 June 2001

Please note that the schedule above only reflects a 30-day public comment period. While we hope for this duration, there is the very strong likelihood that an extension to 60 days will be asked for. Should this be the case, an additional FFA extension request will be submitted to the BCT at that time. To keep the BCT informed as to progress made, it was agreed upon by all parties on the 14 December, 2000 conference call that bi-weekly conference call updates with DOJ would be put in place. The first follow on conference call was scheduled for 16 January 2001.

As a result of the continuing settlement negotiations, which as discussed, appear to be reaching their final stages, we request a 6 month extension for the Draft ROD for (OU)-1 and (OU)-2A. As such, the proposed date for submitting the Draft ROD will change from 18 December 2000 to 18 June 2001. We share the BCT's concern over the length of this process, and will expedite it with every opportunity. Thank you in advance for your support of this lengthy and complicated process. Please call me at (619) 532-0784 should 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

Copy to: (w/encl)
Mr. John Scandura, DTSC
Mr. Glenn Kistner, U.S. EPA

APPENDIX A

MCAS El Toro Schedule

	<u>Current</u> <u>Completion Dates</u>	<u>New</u> <u>Completion Dates</u>	<u>Change in</u> <u>Dates</u>
<u>Operable Unit (OU)-1: Site 18</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	18 Dec 00	18 June 01	+6 Months
<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	18 Dec 00	18 June 01	+6 Months
<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	

APPENDIX A MCAS El Toro Schedule

	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</u>
<u>OU-2B: Sites 2 & 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 & 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	15 Dec 00	No Change	
<u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 & 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, & 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 & 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	12 Oct 00	22 Nov 00	
<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	17 Jan 01	No Change	
Draft Record of Decision	06 Jul 01	No Change	
<u>OU-3: Site 1</u>			
Draft Remedial Investigation	4 Jan 00	19 Feb 02	
Draft Feasibility Study	11 Sep 00	07 Dec 02	
Draft Proposed Plan	18 Apr 01	19 Mar 03	
Draft Record of Decision	14 Dec 01	26 Aug 03	

This schedule reflects current/proposed FFA milestones.

* Not an enforceable FFA deliverable