



**DEPARTMENT OF THE NAVY**  
SOUTHWEST DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
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MCAS EL TORO  
SSIC NO. 5090.3  
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Ser 06CC.AP/0424  
April 16, 2004

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Fellow Federal Facility Agreement (FFA) Representatives:

**SUBJECT: FEDERAL FACILITY AGREEMENT EXTENSION REQUEST, OPERABLE UNIT (OU)-1 and OU-2A, INSTALLATION RESTORATION PROGRAM (IRP) SITES 18 AND 24, FORMER MARINE CORPS AIR STATION (MCAS) EL TORO, CALIFORNIA**

This letter is submitted to request an extension to the MCAS El Toro Federal Facility Agreement (FFA) Appendix A Schedule for primary documents. Operable Unit (OU)-1 (Site 18 Regional Volatile Organic Compound [VOC] Groundwater Plume) and OU-2A (Site 24 VOC Source Area) require revised milestone deliverable dates for the completion of two post Record of Decision (ROD) draft primary documents as follows: Site 18 Preliminary Remedial Design (90%) and Site 24 Preliminary Remedial Design (90%). This request will extend the deliverable date for the Site 18 Preliminary Remedial Design (90%) by 88 calendar days and the Site 24 Preliminary Remedial Design (90%) by 44 calendar days, and is made pursuant to Section 9.2 (g) of the FFA.

Upon finalization of the ROD for OU-1 and OU-2A, the Settlement Agreement between the United States, Orange County Water District (OCWD), and Irvine Ranch Water District (IRWD) was enacted. As such, under the Settlement Agreement, the IRWD and OCWD are required to prepare all documentation that addresses the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Components of the Irvine Desalter Project (IDP) as specified in the ROD. Therefore, the post ROD deliverables were separated into the following two components: Shallow Groundwater Unit (SGU) – Site 24, and IDP – Site 18. The FFA deliverable date was April 19, 2004 for the Site 24 Preliminary Remedial Design (90%), and June 11, 2004 for the Site 18 Preliminary Remedial Design (90%).

In February 2004, the Base Realignment and Closure (BRAC) Cleanup Team (BCT) reviewed two informal FFA deliverables for the SGU: the 60 Percent Design Submittal and Pre-Design Investigation Technical Memorandum, which are supporting documents for the Site 24 remedial design. Following a BCT meeting on March 3, 2004, the Navy agreed to incorporate the pre-design investigation data in the groundwater model that is being used as the basis for the extraction well field design, incorporate soil vapor extraction into the SGU groundwater remedy pursuant to the ROD, and propose an approach to monitor the effectiveness of the remedial action in the Preliminary Remedial Design (90%). Therefore, during the April 1, 2004 BCT meeting, the Navy proposed to extend the deliverable date for the Site 24 Preliminary Remedial Design (90%) from April 19, 2004, to June 2, 2004.

Furthermore, IRWD proposed key design modifications to the IDP 60 Percent Design Submittal (an informal FFA supporting document) during the April 1, 2004 BCT meeting, based on their pilot testing at Sites 18 and 24 and their efforts to obtain a right-of-way to locate well ET-2 in the Principal Aquifer pursuant to the ROD. These proposed design revisions included the following: (1) locating the Principal Aquifer extraction well ET-2 at existing water production well TIC-113, (2) locating the VOC treatment facility for SGU water at a property adjacent to MCAS El Toro instead of at the Central Treatment Plant (CTP), and (3) locating the VOC treatment facility for Principal Aquifer water near well ET-1 instead of at the CTP. IRWD agreed to use groundwater modeling to demonstrate to the BCT whether locating ET-2 at TIC-113 can be an effective component of the Principal Aquifer remedy.

To incorporate these design revisions, during the April 1, 2004 BCT meeting IRWD proposed to extend the deliverable date for the Site 18 Preliminary Remedial Design (90%) from June 11, 2004 to September 7, 2004. The BCT concurred with the proposed extension during the meeting and requested preparation and submittal of a supporting modeling technical memorandum to document the IDP design revisions, and, if necessary, an Explanation of Significant Differences (ESD) to document ROD revisions.

At this time the Navy is not requesting an extension for the SGU and IDP Final Remedial Design draft primary FFA deliverables. However, the Navy recognizes that due to the magnitude of the design revisions, the BCT may have comments on the Preliminary Remedial Design (90%) deliverables that may require extending the Final Remedial Design deliverable dates. Should it be necessary, the Navy will request an appropriate extension for the Final Remedial Design deliverables at a later date.

This extension request for the SGU and IDP Preliminary Remedial Design (90%) primary FFA deliverables is necessary to account for the additional work and time associated with resolving the design issues discussed above. These activities are acceptable causes for extensions per the FFA, Section 9. The specific language in the FFA used as the principal justification for this extension request is:

Section 9.2 (g): Any other event or series of events mutually agreed to by the Parties as constituting good cause.

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Thank you in advance for your cooperation and support. Given the nature of the proposed changes, and previous discussions at the April 1, 2004 BCT meeting, we anticipate your concurrence with our request. Should you have questions or need additional information, please contact Mr. Karnig Ohannessian, Remedial Project Manager, at (619) 532-0796 or me at (619) 532-0784.

Sincerely,



F. ANDREW PISZKIN  
Base Realignment and Closure  
Environmental Coordinator  
By direction of the Commander

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