

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

27 September 2005

Mr Darren Newton
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station El Toro
7040 Trabuco Road
Irvine, CA 92618

RE: Federal Facility Agreement (FFA) Appendix A Schedule and Extension Request for Anomaly Area 3 (AA-3) and Installation Restoration Program (IRP) Sites 1, 2, 3, and 5 Former Marine Corps Air Station (MCAS) El Toro, California

Dear Mr. Newton:

EPA has received the Department of the Navy's (DoN) updated MCAS El Toro FFA Appendix A Schedule for primary submittal documents and request for extensions for AA-3 and IRP Sites 1, 2, 3, and 5. We also appreciate receiving the detailed IRP sites schedules for our records to track advancement of IRP site work.

The original schedule for AA-3 was abbreviated due to the combination of the Remedial Investigation (RI) and Feasibility Study (FS) into one document. This is the second request for an extension since the abbreviated schedule was approved. At this time the schedule for this site remains accelerated due to the RI/FS report format and EPA approves of the proposed extension.

For IRP Site 1 the extension request is in part due to the request made by EPA on behalf of the U.S. Fish and Wildlife Service for an extension on the review period for the Draft RI Report. The EPA also agrees with the need to incorporate the findings of recent field investigations and treatability testing into the Final RI Report and approves the proposed extension request.

For IRP Site 2 EPA also agrees with the need to incorporate the findings of recent field investigations and treatability testing into the Final FS Addendum. The Agency had significant technical comments on the draft document and sees the need to include recent data in development of the potential remedial alternatives for this site. Therefore, EPA approves the proposed extension request.

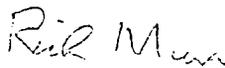
received
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For IRP Sites 3 and 5 EPA provided limited technical comments on the Draft FS Addendum (March 2005) and Technical Memorandum for Pre-design Investigation (February 2005) in a letter to the DoN dated 4 May 2005; even fewer comments, primarily a repeat of issues raised on the review of the Draft FS Addendum, were sent out in a letter to the DoN dated 1 June 2005 on the Draft Proposed Plan (May 2005) for Sites 3 and 5. This extension request is for a delay of seven months for delivery of the Draft Record of Decision (ROD). Based on the timing (ie., May and June 2005) and limited nature of the comments that EPA has provided on the draft documents leading up to submission of the Draft ROD, the Agency finds this extension request to be unreasonable.

It is our understanding that there are unresolved issues with the California Department of Health Services (DHS) related to radiological investigations at the sites that are partially to blame for the delays. EPA was involved with historical discussions and agreements on radiological issues at the former MCAS El Toro and for the past year has not had any comments on radiological release reports submitted for Agency review as all work has followed agreed upon protocols and standards. Therefore, EPA recommends that the DoN schedule a meeting with DHS and other appropriate California EPA representatives at the earliest convenience to work out these unresolved issues.

If you should have any questions, please feel free to call me at 415-972-3349.

Sincerely,



Rich Muza
Remedial Project Manager
Federal Facility and Site Cleanup Branch

cc. Content Arnold, NFECSW SDIEGO
Frank Cheng, DTSC
John Broderick, RWQCB
Randy Styner, OCEHCA
Bob Woodings, RAB Co-Chair
Marcia Rudolph, RAB Subcommittee Chair