



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

June 3, 2004

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
Marine Corps Air Station, El Toro
7040 Trabuco Road
Irvine, CA 92618

RE: Federal Facility Agreement Schedule Extension Request, Operable Unit 3 (OU-3),
Installation Restoration Program (IRP) Site 1, Explosive Ordnance Disposal Range,
Former MCAS El Toro, dated May 27, 2004

Dear Mr. Piszkin,

EPA has reviewed the Navy's request for an extension of 14 months to submit the Remedial Investigation as well as subsequent documents for Site 1 at the Former MCAS El Toro. EPA does not concur with the proposed schedule of submittals and we provide reasons for our nonconcurrency below.

The proposed schedule devotes nearly one year to development and implementation of a treatability study prior to completion of the draft RI. The schedule then shows an additional year beyond submittal of the RI before the Feasibility Study is completed. At the BCT meeting held on May 26, 2004, EPA and the Regional Water Quality Control Board both stated that it was not necessary to complete a treatability study for the perchlorate plume beneath Site 1 prior to submitting the Remedial Investigation. The treatability study will provide useful information when selecting the remedy in the Record of Decision, however this evaluation is not necessary for inclusion in the Remedial Investigation. We recommend that the Navy conduct the treatability study concurrently with the RI/FS process, but not let the treatability study be the schedule driver.

Based on groundwater results the Navy shared with the BCT at the May 26 meeting, the concentrations in the perchlorate plume actually appear to be increasing in some areas and is found as high as 440 ug/l in one well. Based on this fact as well as the fact that the last extension the Navy requested was for 15 months, the current request for an additional 14 months is not reasonable.

We request that the Navy set up a conference call within the next two weeks among all members of the BCT to discuss ways in which the investigation and cleanup timeline for this site can be reduced. If you have any questions, please call me at (415)972-3012.

6/8/04
RECEIVED

Sincerely,

A handwritten signature in black ink, appearing to read "Nicole Moutoux". The signature is fluid and cursive, with the first name "Nicole" written in a larger, more prominent script than the last name "Moutoux".

Nicole Moutoux
Project Manager
Federal Facilities Cleanup Branch

cc: Tayseer Mahmoudi, DTSC
Gordon Brown, SWDIV
John Broderick, RWQCB
Bob Woodings, RAB Co-Chair
Marcia Rudolph, RAB Subcommittee chair
Michelle Schutz, EPA