



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

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MCAS EL TORO  
SSIC NO. 5090.3.A

5090  
Ser 06CC.DG/0072  
17 January, 2001

Mr. John Scandura  
California Environmental Protection Agency  
Department of Toxic Substances Control, Region 4  
Chief Office of Military Facilities  
Southern California Operations  
5796 Corporate Avenue  
Cypress, CA 90630

Subj: FEDERAL FACILITY AGREEMENT SCHEDULE, OPERABLE UNIT (OU)-3  
(SITE 16), MARINE CORPS AIR STATION (MCAS) EL TORO

Dear Mr. Scandura:

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 Unit (OU) -3, Site 16, (Crash Crew Pit #2), requires revised milestone deliverable dates for the Draft Proposed Plan and Draft Record of Decision. Enclosure (1) presents our FFA schedule with the revised primary milestones incorporated. This request will extend the deliverable dates for both the Draft Proposed Plan and Draft Record of Decision by 18 weeks each, and is made pursuant to Section 9.2 (g) of the FFA.

From the time of the last schedule extension request (25 September 2000), a great deal has taken place. The BCT and RAB have been briefed on site status, site visits have been conducted, and perhaps most importantly, the pilot study has performed extremely well. More specifically, the following actions have been completed:

- September 2000 - Conducted step draw down aquifer testing at two groundwater extraction wells and SVE testing at one well in preparation for MPE pilot testing.
- 27 September 2000 - Navy presented the BCT/RAB with an overview of the MPE Pilot Study and the overall objectives of the testing.
- October 2000 - Initiated the MPE pilot testing. Test was initially planned for a two-week test but since the removal of VOCs from the soil was shown to be very successful, the pilot testing was extended.
- 1 November 2000 - Navy provided BCT a written update on the initial results from the pilot study and indicated that the Navy plans to continue the study for upwards of two months.
- 29 November 2000 - Navy presented proposed modifications to the pilot study to test if extraction from adjacent wells will improve the overall efficiency and removal of soil gas at the site.
- 6 December 2000 - Navy submits a letter summarizing the proposed modifications to the MPE pilot study.
- 27 December 2000 - MPE system shut off to prepare for implementing modifications to test
- 9 January 2000 - Navy conducted conference call with BCT to discuss comments on the proposed modifications.

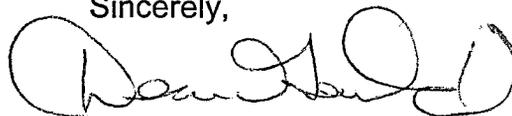
10 January 2001 - Navy begins implementation of modifications to the MPE system.

As illustrated by the above events, significant progress has been made and each step has been communicated to the BCT. With the success of the pilot study however, a change to the related CERCLA documents will be required. As you are aware, it is our hope that given the effectiveness of the pilot study, the source area may be adequately addressed by this action. While we can all agree that expedited remediation of the source area is a positive up-front step, modifications to the Draft Final FS will be required to address the change in focus. This will in turn result in modifications to the Draft Proposed Plan and Draft ROD, which we hope to have centered primarily on the groundwater. These changes will not compromise public participation. Other causes for the extension request include the extension of the pilot test itself, additional time needed for the original installation of the wells, and more time than estimated to resolve all BCT comments.

By implementing the approach outlined, the timeline leading to ROD signature will be delayed. We feel confident however, that due to the many positive aspects of this approach, which include expedited removal of contamination source and possible shortening of the overall schedule for the site, the BCT will remain supportive of this method and endorse this extension request. To better illustrate actions completed and those that remain, enclosure (2) is provided. In reviewing it, you will note an extended BCT review period for the Draft Final FS given the significant changes expected. In order to minimize the impact though, and given the BCT's familiarity with the Site and the new approach, the Draft Proposed Plan is scheduled to go out mid-way through the extended draft Final FS review.

We feel that the detailed schedule above presents an aggressive yet obtainable approach to Site 16, which is in line with the BCT vision and FFA guidance. The deliverable date for the Draft Proposed Plan will shift from 17 Jan 01 to 23 May 01, and the Draft Record of Decision will be adjusted from 06 July 01 to 09 November 01. Thank you in advance for your support, and please call me at (619) 532-0784 if 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  
2. Extended schedule for Site 16

Copy to: (w/encl)  
Mr. John Broderick, RWQCB  
Ms. Nicole Moutoux, U.S. EPA

## APPENDIX A MCAS El Toro Schedule

<u>Operable Unit (OU)-1: Site 18</u>	<u>Current Completion Dates</u>	<u>New Completion Dates</u>	<u>Change in Dates</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 <sup>rd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 00	<b>01 May 01**</b>	
 <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 <sup>nd</sup> Draft Proposed Plan	31 Mar 00	No Change	
Draft Final Proposed Plan	11 Aug 00	No Change	
Draft Record of Decision	18 Dec 00	<b>01 May 01**</b>	
 <u>OU-2B: Sites 2 &amp; 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>
<b><u>OU-2B: Sites 2 &amp; 17 (continued)</u></b>			
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	
<b><u>OU-2C: Sites 3 &amp; 5</u></b>			
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	15 May 01	
<b><u>OU-3: Sites 4, 6, 9, 10, 13, 15, 19, 20, 21 &amp; 22 and OU-2A: Site 25</u></b>			
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	
<b><u>OU-3: Sites 8, 11, &amp; 12</u></b>			
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	
<b><u>OU-3: Sites 7 &amp; 14</u></b>			
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	
<b><u>OU-3: Site 16</u></b>			
Draft Remedial Investigation	20 Nov 96	No Change	
Draft Feasibility Study	18 Feb 00	No Change	
Draft Proposed Plan	17 Jan 01	<b>23 May 01</b>	<b>+18 Weeks</b>
Draft Record of Decision	06 Jul 01	<b>09 Nov 01</b>	<b>+18 Weeks</b>
<b><u>OU-3: Site 1</u></b>			
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

\*\* As proposed by U.S. EPA in response to DON FFA extension request of 15 December 2000

**SCHEDULE FOR FS/PP/ROD AT SITE 16**

1. Prepare Draft FS Report	9/13/99A	1/24/00A
2. Issue FS to SWDIV for over the shoulder review		1/24/00A
3. SWDIV Review	1/24/00A	1/31/00A
4. Revise Draft FS Report per SWDIV comments	2/1/00A	2/8/00A
5. Issue Draft FS Report to SWDIV/Agency		2/17/00A
6. SWDIV/Agency Review of Draft FS Report	2/17/00A	4/17/00A
7. Incorporate/Respond to SWDIV/Agency Comments	4/17/00A	11/29/00
8. Prepare Draft MPE Pilot Study WP	3/6/00A	5/21/00A
9. Issue WP to SWDIV for over the shoulder review		5/22/00A
10. SWDIV review	5/22/00A	6/2/00A
11. Revise Draft WP per SWDIV comments	6/5/00A	6/9/00A
12. Issue Draft WP to SWDIV/Agency		6/12/00A
13. SWDIV/Agency Review of Draft WP Report	6/12/00A	7/11/00A
14. Incorporate/Respond to SWDIV/Agency Comments	7/11/00A	7/26/00A
15. Issue Final WP to SWDIV/Agency		7/26/00A
16. MPE Pilot Testing	7/31/00A	3/31/01
17. Prepare Draft Technical Memo for MPE Pilot Study	12/18/01	2/12/01
18. Issue Draft Tech Memo for SWDIV Review	02/13/01	02/20/01
19. Revise Draft Tech Memo per SWDIV Comments	02/20/01	02/28/01
20. Issue Draft Tech Memo to SWDIV/Agency		02/28/01
21. Prepare Draft Final FS Report	02/28/01	04/10/01
22. Issue Draft Final FS Report for SWDIV Review	04/11/01	04/17/01
23. Revise Draft Final FS Report per SWDIV Comments	04/18/01	04/30/01
24. Issue Draft Final FS Report to SWDIV/Agency		04/30/01
25. SWDIV/Agency Review of Draft Final FS Report	04/30/01	06/29/01
26. Prepare Final FS Report	06/29/01	07/14/01
27. Issue Final FS Report for SWDIV Review	07/15/01	07/22/01
28. Revise Final FS Report per SWDIV Comments	07/22/01	07/31/01
29. Issue Final FS Report to SWDIV/Agency	10/01/00	07/31/01
30. Prepare/Issue 1 <sup>st</sup> Working Draft Proposed Plan	03/30/01	03/30/01
31. SWDIV Review (2 weeks)	04/09/01	04/09/01
32. Incorporate comments/Issue 2 <sup>nd</sup> Working Draft PP	04/16/01	04/16/01
33. SWDIV Review (2 weeks)	04/23/01	05/07/01
34. Incorporate SWDIV comments (2 weeks)	05/08/01	05/21/01
35. Issue Draft PP ( <b>Not Current FFA Date</b> )		<b>05/23/01</b>
36. BCT-regulator review of Draft PP (60 days)	05/23/01	07/23/01
37. Incorp. reg. Comments (2 weeks)	07/23/01	08/06/01
38. Issue pre-Draft Final PP to SWDIV		08/06/01
39. SWDIV Review (1 week)	08/06/01	08/13/01
40. Incorp. SWDIV comments (1 week)	08/13/01	08/20/01
41. Issue Draft Final PP to BCT		08/21/01
42. Regulator rvw of Draft Final PP (assume 30 days)	08/21/01	09/21/01
43. Incorp. reg. Cmts (1 week)	09/21/01	09/28/01
44. Issue Final PP for SWDIV app.		09/28/01
45. Receive Approval/Print Proposed Plan	10/01/01	10/05/01
46. Public Comment Period (minimum 30 days)	10/05/01	11/05/01
47. Public Meeting (held mid-point of comment period)		10/17/01
48. Issue Draft ROD ( <b>Not Current FFA Date</b> )		<b>11/09/01</b>