



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE RD, SUITE 900
SAN DIEGO, CA 92108-4310

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MCAS EL TORO
SSIC NO. 5090.3.A

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AUG 04 2008

Mr. Richard Muza
Remedial Project Manager
U.S. Environmental Protection Agency
Region IX
75 Hawthorne St, (Mail Code SFD-8-1)
San Francisco, CA 94105

Mr. Quang Than
Remedial Project Manager
California Department of Toxic Substances Control
Office of Military Facilities
5796 Corporate Ave.
Cypress, CA 90630

Mr. John Broderick
Remedial Project Manager
California Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Dear Fellow Federal Facility Agreement (FFA) Representatives:

**SUBJECT: FEDERAL FACILITY AGREEMENT APPENDIX A SCHEDULE EXTENSION
REQUEST FOR INSTALLATION RESTORATION PROGRAM SITES 1, 2, AND 17
FORMER MARINE CORPS AIR STATION EL TORO, CALIFORNIA**

This letter is written to request an extension to the Marine Corps Air Station (MCAS) El Toro Federal Facility Agreement (FFA) Appendix A Schedule for Installation Restoration Program (IRP) Site 1 Soil (Former Explosive Ordnance Disposal [EOD] Training Range), IRP Site 2 Soil (Magazine Road Landfill), and IRP Site 17 (Communication Station Landfill).

IRP Site 1 Soil requires revised deliverable dates for the Draft Final Feasibility Study (FS), Draft Proposed Plan (PP), and Draft Record of Decision (ROD) based on requiring additional time to complete technical documentation to support subsequent project decisions. As you know, in response to the California Regional Water Quality Board, Santa Ana Region (RWQCB) comments on the Draft Feasibility Study (FS) Report, the Navy conducted additional groundwater monitoring at IRP Site 1 to assess whether groundwater quality was impaired by total petroleum hydrocarbon (TPH) compounds in soil. The groundwater monitoring results were presented in the *Draft Letter Report, Groundwater Monitoring for Petroleum Hydrocarbons at Former MCAS El Toro IRP Site 1*. The Navy received RWQCB comments on this Draft Letter Report on June 25, 2008. Given the significance of the RWQCB comments and as indicated in our email of June 26, 2008, the Navy needs additional time to evaluate the comments and prepare a response to the RWQCB's request to conduct corrective action for the TPH in soil. As such, additional time is required to resolve agency comments, revise the Draft Final FS Report, and provide a thorough technical review of all aforementioned documents. The additional time will result in a quality document.

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IRP Site 2 Soil and IRP Site 17 require a revised deliverable date for the Draft Interim-Remedial Action Completion Report (I-RACR). Based on the timely completion of IRP Site 17 construction, the Navy has an opportunity to prepare a single RACR addressing both sites instead of two I-RACR documents. By combining the two sites into a single RACR the Navy believes it will facilitate a streamlined review and minimize duplication of effort. Additionally, based on a reevaluation of the *Department of Defense and Environmental Protection Agency Joint Guidance Recommended Streamlined Site Closeout and NPL Deletion Process for DoD Facilities (2006)* guidance, the Navy has concluded that a RACR in lieu of an I-RACR can be prepared since all guidance criteria has been attained. RACR criteria include the following: construction activities are complete, remedial action objectives have been achieved, and institutional controls are in place, as appropriate.

The following table identifies the submittals and the associated schedule extensions relating to this request, which is made pursuant to FFA Section 9.2(d) and/or (g) for IRP Sites 1, 2 and 17. Enclosure (1) presents our FFA Appendix A with the revised primary and draft final milestones included in italicized and bold text.

IRP Site 1 Soil Submittals	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Final Feasibility Study	8/04/2008	8/29/2008	~1 Month
Draft Proposed Plan	10/27/2008	11/17/2008	3 Weeks
Draft Record of Decision	5/29/2009	6/19/2009	3 Weeks
IRP Site 2 Soil Primary Submittal	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Remedial Action Completion Report	8/5/2008	10/24/2008	3 Months
IRP Site 17 Primary Submittal	Current Deliverable Date	Revised Deliverable Date	Extension
Draft Remedial Action Completion Report	8/22/2008	10/24/2008	2 Months

Thank you for your cooperation and continued support. Should you have questions or need additional information, please contact Ms. Content Arnold, Lead Remedial Project Manager at (619) 532-0790.

Sincerely,



ANTHONY MEGLIOLA
 Base Closure Manager
 By direction of the Director

Enclosure: (1) Federal Facility Agreement Appendix A Schedule, Former MCAS El Toro

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Blind copy to: (w/ enclosure)

BPMOW:

D. Theroux

C. Arnold

J. Callian

L. Cardinale

R. Pribyl

M. Smits

M. Flesch, USMC BRAC

Q file

Outgoing File

Serial File

SWDIV:

D. Silva, FISC Bldg-1, 1220 Pacific Highway Mailroom (Administrative Record – 2 copies)

D. Silva, FISC Bldg-1, 1220 Pacific Highway Mailroom (Information Repository – 1 copy)

Writer: C. Arnold, BPMOW.CA, 2-0790.

Typist: B. Foster, BPMOW.BF, 2-0914, MD:\FFA_EXTENSION_REQUEST_FINAL SITES 1 2 AND
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Appendix A

Submittal Milestones

Site 1 Soil (Former Explosive Ordnance Disposal [EOD] Training Range)

Primary Submittal	Deliverable Date
Draft Remedial Investigation	06-03-2005
Draft Feasibility Study	01-29-2007
<i>Draft Proposed Plan</i>	<i>11-17-2008</i>
<i>Draft Record of Decision</i>	<i>06-19-2009</i>

Draft Final Submittal	Deliverable Date
<i>Draft Final Feasibility Study</i>	<i>08-29-2008</i>

Site 1 (Former EOD Training Range) 1 & Site 2 (Magazine Road Landfill)

Groundwater

Primary Submittal	Deliverable Date
Draft Proposed Plan	02-16-2009
Draft Record of Decision	09-03-2009

Draft Final Submittal	Deliverable Date
Draft Final Feasibility Study	11-17-2008

Sites 2 & 17 (Magazine Road and Communication Station Landfills)

Primary Submittal	Deliverable Date
Draft Final Remedial Design	07-19-2004
Draft Sites 2 and 17 Operation and Maintenance Plan	09-14-2007
<i>Site 2 Draft Remedial Action Completion Report</i>	<i>10-24-2008</i>
<i>Site 17 Draft Remedial Action Completion Report</i>	<i>10-24-2008</i>

Sites 3 & 5 (Original and Perimeter Road Landfills)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action Work Plan*	09-02-2008
Draft Operation and Maintenance Plan/Long-Term Monitoring Plan**	04-09-2009
Draft Interim-Remedial Action Completion Report***	01-26-2010
Draft Operating Properly and Successfully Report	12-08-2010

* Includes Construction Quality Assurance (CQA) Plan, Construction Quality Control (CQC) Plan, and Contingency Plan

** Includes Long-Term Contingency Plan

***Equivalent to Project Closeout Report

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Appendix A

Submittal Milestones

Anomaly Area 3

Primary Submittal	Deliverable Date
Draft Remedial Investigation/Feasibility Study	12-06-2005
Draft Proposed Plan	06-23-2008
Draft Record of Decision	02-23-2009

Sites 8 (DRMO Storage Yard) & 12 (Sludge Drying Beds)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action Work Plan	09-12-2007
Construction Quality Assurance Plan	09-12-2007
Construction Quality Control Plan	09-12-2007
Project Closeout Report	10-09-2008

Site 16 (Crash Crew Pit No. 2)

Primary Submittal	Deliverable Date
Draft Remedial Design/Remedial Action MNA Work Plan	11-18-2003
Draft Remedial Design	07-27-2005
Draft Operating Properly and Successfully Report	03-02-2006

Site 18 (VOC Regional Groundwater Plume)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	03-14-2005
Final Remedial Design (100% Design)	05-31-2005
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial Action Completion Report	05-14-2007

Site 24 (VOC Source Area – Shallow Groundwater Unit)

Primary Submittal	Deliverable Date
Preliminary Remedial Design (90% Design)	06-02-2004
Final Remedial Design (100% Design)	12-13-2004
Draft Operation & Maintenance Plan	01-11-2007
Draft Project Closeout Report / Interim – Remedial Action Completion Report	05-14-2007