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1813SC/L#3056
06 NOV 1992

Ms. Roberta Blank
U.S. EPA Region 9, Mail Stop H-9-2
75 Hawthorne Street
San Francisco, CA 94105

RE: Proposed Revisions to the Federal Facilities Agreement (FFA)
Schedule for Naval Air Station (NAS) Moffett Field

Dear Roberta:

Please find enclosed proposed revisions to the FFA schedules for remedial investigations and feasibility studies at NAS Moffett Field. The schedules reflect revisions where possible for all operable unit and site-wide documents. Please note the schedule for OU3 will require further modification due to delayed removal activities at sites 12 and 15. A new schedule will be proposed as soon as the removal activity schedules are finalized. Finally, the Navy proposes accelerating schedules for all OUs by submitting the record of decision (ROD) for each OU within 45 days of the end of the public comment period and condensing review and revision periods for subsequent submittals.

Please let our project manager, Mr. Stephen Chao, know if this proposal is acceptable to the regulatory agencies. Mr. Chao can be reached at (415) 244-2563.

Sincerely,
Original signed by:

Gil Rivera
Head, Installation Restoration Section

Enclosure

cc: (w/encl)
DTSC, Mr. Cyrus Shabahari
RWQCB, Ms. Elizabeth Adams

Blind Copy to: (w/encl)
NAS Moffett Field, Lt. Susanne Openshaw
PRC Environmental Management, Mr. Josh Marvil, PRC
James M. Montgomery, Dr. Joe LeClaire,
IT Corporation, Mr. C. Keith Bradley
Martin Marietta Engergy Systems, Inc., Ms. Paula Pritz

bbc: (w/encl)
09CMN, 181, 1813, 1813SC, 1813CG, 1813S

1842

**PROPOSED REVISIONS TO
MODIFICATIONS TO ATTACHMENT 3
OF THE FEDERAL FACILITIES AGREEMENT SCHEDULE
(October 23, 1992)**

(The Deadlines in this Attachment 3 are enforceable and, although Target Dates are only for the purpose of projecting an overall schedule and are not enforceable, all Parties will endeavor to complete all tasks as quickly as possible).

OPERABLE UNIT 1 (OU-1): Sites 1 and 2 Soils

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft OU-1 Remedial Investigation (RI) Report	November 2, 1992	November 2, 1992
Draft Initial Screening of Remedial Technologies: OU-1	November 2, 1992	November 2, 1992
Draft Final OU-1 RI Report	March 2, 1993 ¹	March 3, 1993 ¹
Final OU-1 RI Report	April 3, 1993 ¹	April 3, 1993 ¹
Draft Report Feasibility Study (FS): OU-1	May 3, 1993	May 3, 1993
Draft Proposed Plan: OU-1	May 3, 1993	May 3, 1993
Draft Final FS Report	September 3, 1993 ¹	September 3, 1993 ¹
Draft Final Proposed Plan: OU-1	September 3, 1993 ¹	September 3, 1993 ¹
Final FS Report: OU-1	October 4, 1993 ¹	October 4, 1993 ¹
Final Proposed Plan: OU-1	October 4, 1993 ¹	October 4, 1993 ¹
Draft Record of Decision (ROD): OU-1	January 15, 1994	December 20, 1993 ²
Draft RD/RA Workplan: OU-1	January 15, 1994	December 20, 1993 ²
Draft Final ROD: OU-1	May 15, 1994 ¹	March 25, 1994 ³
Draft Final RD/RA Workplan: OU-1	May 15, 1994 ¹	March 25, 1994 ³
Final ROD: OU-1	June 15, 1994 ¹	April 25, 1994 ¹
Final RD/RA Workplan: OU-1	June 15, 1994 ¹	April 25, 1994 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

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OPERABLE UNIT 2 (OU-2): Sites 3,4,5,6,7,8,9,10,11,13,14,16,17,18, and 19 Soils

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft OU-2 Remedial Investigation (RI) Report	April 1, 1992	Submitted April 1, 1992
Draft Initial Screening of Remedial Technologies: OU-2	April 1, 1992	Submitted April 1, 1992
Draft Final OU-2 RI Report	August 3, 1992 ¹	Submitted August 3, 1992
Final OU-2 RI Report	September 3, 1992 ¹	January 29, 1993 ¹
Draft FS Report: OU-2	October 1, 1992	Submitted October 1, 1992
Draft Proposed Plan: OU-2	October 1 1992 ²	Submitted October 1, 1992
Draft Final FS Report: OU-2	February 1, 1993 ¹	March 5, 1993 ¹
Draft Final Proposed Plan: OU-2	February 1, 1993 ¹	March 5, 1993 ¹
Final FS Report: OU-2	March 1, 1993 ¹	April 8, 1993
Final Proposed Plan: OU-2	March 1, 1993 ¹	April 8, 1993
Draft Record of Decision (ROD): OU-2	June 15, 1993	June 18, 1993 ²
Draft RD/RA Workplan: OU-2	June 15, 1993	June 18, 1993 ²
Draft Final ROD: OU-2	October 15, 1993 ¹	October 17, 1993 ³
Draft Final RD/RA: Workplan OU-2	October 15, 1993 ¹	October 17, 1993 ³
Final ROD: OU-2	November 15, 1993 ¹	November 18, 1993 ¹
Final RD/RA Workplan: OU-2	November 15, 1993 ¹	November 18, 1993 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

⁴ Assumes the FFA signatories agree by November 13, 1992, that the definition of OU2 is not changed from the original definition, and that regulatory agency comments on Navy responses to agency comments on the Draft Final RI Report are received by the Navy no later than December 18, 1992 (the Navy will provide responses to the agency comments on the Draft Final RI Report by December 4, 1992.

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OPERABLE UNIT 3 (OU-3): Sites 12 and 15 Soils⁴

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft OU-3 Remedial Investigation (RI) Report	April 1, 1993	April 1, 1993
Draft Initial Screening of Remedial Technologies: OU-3	April 1, 1993	April 1, 1993
Draft Final OU-3 RI Report	August 3, 1993 ¹	August 3, 1993 ¹
Final OU-3 RI Report	September 3, 1993 ¹	September 3, 1993 ¹
Draft FS Report: OU-3	October 1, 1993	October 1, 1993
Draft Proposed Plan: OU-3	October 1, 1993	October 1, 1993
Draft Final FS Report: OU-3	February 1, 1994 ¹	February 1, 1994 ¹
Draft Final Proposed Plan: OU-3	February 1, 1994 ¹	February 1, 1994 ¹
Final FS Report: OU-3	March 1, 1994 ¹	March 1, 1994 ¹
Final Proposed Plan: OU-3	March 1, 1994 ¹	March 1, 1994 ¹
Draft Record of Decision (ROD): OU-3	June 15, 1994	May 16, 1994 ²
Draft RD/RA Workplan: OU-3	June 15, 1994	May 16, 1994 ²
Draft Final ROD: OU-3	October 15, 1994 ¹	August 19, 1994 ³
Draft Final RD/RA: Workplan OU-3	October 15, 1994 ¹	August 19, 1994 ³
Final ROD: OU-3	November 15, 1994 ¹	September 19, 1994 ¹
Final RD/RA Workplan: OU-3	November 15, 1994 ¹	September 19, 1994 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

⁴ Schedule is contingent on removal of tanks at site 15 and excavation of soils at site 12. The RI and FS were originally intended to address post-removal conditions. Therefore, the schedule for RI/FS report submittals will require modification due to delayed removal activities at sites 12 and 15.

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OPERABLE UNIT 5 (OU-5): EASTSIDE AQUIFERS

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft OU-5 Remedial Investigation (RI) Report	April 1, 1993	April 1, 1993
Draft Initial Screening of Remedial Technologies: OU-5	April 1, 1993	April 1, 1993
Draft Final OU-5 RI Report	August 2, 1993 ¹	August 2, 1993 ¹
Final OU-5 RI Report	September 2, 1993 ¹	September 2, 1993 ¹
Draft FS Report: OU-5	October 1, 1993	October 1, 1993
Draft Proposed Plan: OU-5	October 1, 1993	October 1, 1993
Draft Final FS Report: OU-5	February 1, 1994 ¹	February 1, 1994 ¹
Draft Final Proposed Plan: OU-5	February 1, 1994 ¹	February 1, 1994 ¹
Final FS Report: OU-5	March 1, 1994 ¹	March 1, 1994 ¹
Final Proposed Plan: OU-5	March 1, 1994 ¹	March 1, 1994 ¹
Draft Record of Decision (ROD): OU-5	June 15, 1994	May 16, 1994 ²
Draft RD/RA Workplan: OU-5	June 15, 1994	May 16, 1994 ²
Draft Final ROD: OU-5	October 17, 1994 ¹	August 19, 1994 ³
Draft Final RD/RA: Workplan OU-5	October 17, 1994 ¹	August 19, 1994 ³
Final ROD: OU-5	November 17, 1994 ¹	September 19, 1994 ¹
Final RD/RA Workplan: OU-5	November 17, 1994 ¹	September 19, 1994 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

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OPERABLE UNIT 6 (OU-6): WETLAND AREAS⁴

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft Field Workplan (FWP): OU-6	July 3, 1992	Submitted July 2, 1992
Draft Final FWP: OU-6	November 3, 1992 ¹	October 30, 1992
Final FWP: OU-6	December 3, 1992 ¹	December 3, 1992 ¹
Draft OU-6 Remedial Investigation (RI) Report	February 1, 1994	February 1, 1994
Draft Initial Screening of Remedial Technologies: OU-6	February 1, 1994	February 1, 1994
Draft Final OU-6 RI Report	June 1, 1994 ¹	June 1, 1994 ¹
Final OU-6 RI Report	July 1, 1994 ¹	July 1, 1994 ¹
Draft FS Report: OU-6	August 1, 1994	August 1, 1994
Draft Proposed Plan: OU-6	August 1, 1994	August 1, 1994
Draft Final FS Report: OU-6	December 1, 1994 ¹	December 1, 1994 ¹
Draft Final Proposed Plan: OU-6	December 1, 1994 ¹	December 1, 1994 ¹
Final FS Report: OU-6	January 1, 1995 ¹	January 1, 1995 ¹
Final Proposed Plan: OU-6	January 1, 1995 ¹	January 1, 1995 ¹
Draft Record of Decision (ROD): OU-6	April 15, 1995	March 15, 1995 ²
Draft RD/RA Workplan: OU-6	April 15, 1995	March 15, 1995 ²
Draft Final ROD: OU-6	August 15, 1995 ¹	June 15, 1995 ³
Draft Final RD/RA Workplan: OU-6	August 15, 1995 ¹	June 15, 1995 ³
Final ROD: OU-6	September 15, 1995 ¹	July 15, 1995 ¹
Final RD/RA Workplan: OU-6	September 15, 1995 ¹	July 15, 1995 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

⁴ NOTE: In letter dated July 10, 1992 an accelerated schedule for OU-6 was proposed. However, the Navy proposes returning to the original FFA schedule (with revisions as listed above) because of the increased scope of activities for OU-6

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STATION-WIDE

DOCUMENTS AND ACTIVITIES	DEADLINE/TARGET	PROPOSED DEADLINE/TARGET
Draft Station-Wide Quality Assurance Project Plan (QAPjP), Field Sampling Plan (FSP), and Health and Safety Plan (HSP)	December 2, 1991	Submitted
Draft Final Station-Wide QAPjP, FSP, and HSP	April 2, 1992 ¹	Submitted
Final Station-Wide QAPjP, FSP, and HSP	May 3, 1992 ¹	Submitted
Draft RI Report: Station-Wide		January 1, 1995
Draft Technology Screening: Station-Wide		January 1, 1995
Draft Final RI Report: Station-Wide		May 1, 1995 ¹
Final RI Report: Station-Wide		June 1, 1995 ¹
Draft FS Report: Station-Wide	July 1, 1995	July 1, 1995
Draft Proposed Plan: Station-Wide	July 1, 1995	July 1, 1995
Draft Final FS Report: Station-Wide	November 1, 1995 ¹	November 1, 1995 ¹
Draft Final Proposed Plan: Station-Wide	November 1, 1995 ¹	November 1, 1995 ¹
Final FS Report: Station-Wide	December 1, 1995 ¹	December 1, 1995 ¹
Final Proposed Plan: Station-Wide	December 1, 1995 ¹	December 1, 1995 ¹
Draft Record of Decision (ROD): Station-Wide	March 15, 1996	February 15, 1996 ²
Draft RD/RA Workplan: Station-Wide	March 15, 1996	February 15, 1996 ²
Draft Final RD/RA Workplan: Station-Wide	July 15, 1996 ¹	May 15, 1996 ²
Draft Final ROD: Station-Wide	July 15, 1996 ¹	May 15, 1996 ²
Final RD/RA Workplan: Station-Wide	August 15, 1996 ¹	June 15, 1996 ¹
Final ROD: Station-Wide	August 15, 1996 ¹	June 15, 1996 ¹

¹ Per consultation section in Attachment 3 of FFA.

² Assumes submittal of ROD and RD/RA WP approximately 45 days following end of public comment period

³ Assumes submittal approximately 90 days after draft submittal (contingent on receipt of agency comments within 30 days)

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WEST-SIDE GROUNDWATER UNIT

Document and Activity	Proposed Deadline/Target
Final West-Side Groundwater Characterization Report	December 31, 1992 ¹

- ¹ Assumes that regulatory agency comments on Navy responses to agency comments on the Draft OU4 RI Report are received by the Navy by November 30, 1992. Further assumes that the contents of the report are limited to the contents of the former OU4 RI Report minus the baseline risk assessment and the runway area.