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LETTER REGARDING INSTALLATION OF CONDUIT AT SITE 3 CAUSEWAY LANDFILL AND
FAILURE TO MEET TERMS OF LAND USE CONTROL IMPLEMENTATION PLANS MCRD
PARRIS ISLAND SC
11/9/2004
MCRD PARRIS ISLAND



UNITED STATES MARINE CORPS

MARINE CORPS RECRUIT DEPOT/EASTERN RECRUITING REGION
P.O. BOX 19401
PARRIS ISLAND, SOUTH CAROLINA 29905-9401

IN REPLY REFER TO:

5090
NREAO
9 Nov 04

Ms. Patricia Goldberg
Remedial Project Manager
Federal Facilities Branch
Waste Management Division
U.S. Environmental Protection Agency
Atlanta Federal Center
Atlanta, GA 30303-8960

Subj: Site/SWMU 3 Causeway Landfill

Dear Ms. Goldberg,

Recently, we have had incidences with work being done on Site 3 without prior approval from your office. Specifically, an in-house workforce installed conduit for our telephone and fiber-optic network across the entire length of the site. I recognize both the severity of the risk posed by penetrating the cover and the administrative burden placed on our program by failing to meet the terms of the Land Use Control Assurance and Land Use Control Implementation Plans (LUCAP and LUCIP). I certainly do not take these matters lightly. Further, it is important to me to maintain the spirit of partnering and its underlying foundation of good faith among the partners.

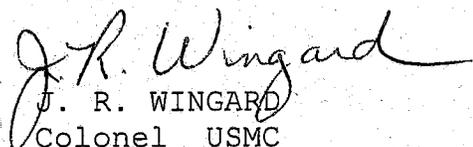
In early August, the Depot Telephone Office initiated a project to install access points on the conduit that had been installed during the remediation of Site/SWMU 3. Based on our survey, we determined that the conduit was too deep below ground surface to be utilized. Without further consultation, we expanded the project to installation of new conduit and the associated access points. We began to install the conduit in a trench approximately 6-inches wide and 30-inches deep over the length of the causeway. We experienced an equipment failure and at the same time were told to stop work. Due to some miscommunication and personnel turnover, we had the mistaken impression that the trench across the site could be completed. Recently, the trench was completed.

Several factors contributed to our failure to meet the standards established in the land use controls. In order to address those issues, we have and will continue to take corrective action. Currently, our Depot Master Plan is being rewritten. The new Master Plan will include all of the land use controls and operational restrictions aboard the Depot. The Master Plan will be widely distributed in hardcopy form and also will be included in our geographic information system (GIS). The GIS provides the best and most readily accessible medium to disseminate information regarding the location, nature and extent of land use restrictions. Additionally, we are taking active measures to educate and ensure that the Depot staff is knowledgeable of our environmental responsibilities in general and specifically, the requirements of the LUCAP and site-specific LUCIPs. We have an Environmental Impact Working Group that is tasked with ensuring that our actions satisfy the requirements of the National Environmental Policy Act (NEPA), as well as, assist the staff in satisfying our environmental requirements through proper planning. Recently, the principle staff officers aboard the Depot underwent NEPA training to reinforce the benefits of proper planning and communication, as well as, crystallize the idea that our work is a matter of public trust.

We will continue to refine our processes. I give you my full assurance that we will continue to take every precaution necessary to ensure that such incidences will not occur again.

My point of contact for this matter is Mr. Tim Harrington. He can be reached at (843) 228-3423.

Sincerely,



J. R. WINGARD
Colonel USMC

By direction of the
Commanding General