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MCRD PARRIS ISLAND  
5090.3a

EMAIL REGARDING U S EPA REGION IV PROPOSAL OF PASSIVE FLUX METER  
EXPERIMENTAL STUDY AT SITE 45 DRY CLEANING FACILITY SPILL AREA MCRD PARRIS  
ISLAND SC  
8/21/2006  
U S EPA REGION IV

**From:** [Koroma-Llamas.Lila@epamail.epa.gov](mailto:Koroma-Llamas.Lila@epamail.epa.gov)  
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**Subject:** Parris Island PFM Implementation Plan  
**Date:** Monday, August 21, 2006 2:24:03 PM  
**Importance:** High

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Hi Team,

Let me try this again. Apparently my first e-mail to you all (see below) never went to you. It went to the PFM Team twice. Can't explain it, except to say I goofed, I guess. But you can tell by the way it was written I truly thought I had copied you all, and was talking to Art, as well as Jim. By the way, THIS e-mail should be going to the entire Team, Jim Cummings, and Cliff Casey for the record. Let's see what happens. Anyhoo.....

With respect to activities at Site 45, in the secondary source zone, a Passive Flux Meter experimental study is being proposed, actually by EPA HQ, to pilot its potential usefulness. Rather than being part of the Treatability Study Work Plan, as previously believed, it is being implemented separately, and ahead of the other Study (see Cliff's note below). It may be pulled back in later with the treatment portion as well. The future is unknown to me. I am sure others can explain it better. But according to Cliff, "The PFM is intended to help with the baseline characterization of any treatment as well as potentially assist in the characterization of the source area (such as time of release, etc.).". In another perspective, it could be considered screening level data, to be later validated with confirmatory sampling. So while I had felt this implementation plan required our review and approval, I am not sure now. There could be some debate over whether the data will be used to make CERCLA decisions or not, either now or some time in the future. Since it's usefulness and applicability is somewhat undetermined at this time, I would err on the side of conservative, get our buy-in up front, and then no questions or debates need to happen later. But there is a time crunch associated with this. So we can decide as a team how to treat this review. I can say that it appears there will be a UIC permit required for tracers, at least. Otherwise, they are going into existing wells and there are little other invasive activities, other than the tracers that may require the UIC permit.

Art, Jim, and Cliff spoke this morning about how to get information to the Team and what to do about it. Jim Cummings offered to distribute via e-mail a link to where we can download the PFM Implementation Plan. According to Cliff, Art agreed to this approach this time, as opposed to going thru Art to the Team, since he will be out of town and time is somewhat of concern. When I spoke to Jim and Cliff (Art was leaving for San Diego, CA) I asked Jim to also include a cover letter explaining the potential application of the PFM and how it may or may not be useful at our site and/or in our Site decision-making, to the degree that he could, without having seen results yet. (Hah! How's that for a bunch of clarifiers!!) We will put this on the 29/30th Meeting agenda. If everyone would, please look for an e-mail from Jim, and download the document, even if you do not have time to read it now. It will only be available for down load for a short time. If you have time to read the plan, that would be great. But if not, we can still talk about it, a pathforward, prioritization, etc. as usual. Jim has offered to brief us on this if we so desire. I told him I was not sure if we would have

access to a conference phone or not (Tim?). But if not, we can always schedule that for a later time if the team desires it.

Thanks,  
Lila

----- Forwarded by Lila Koroma-Llamas/R4/USEPA/US on 08/21/2006 12:54 PM  
-----

"Casey, Cliff C  
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Subject  
RE: Parris Island PFM  
Implementation Plan

Lila,  
Sorry, I have been out of the office the last couple of weeks. The treatability study to use chemical oxidation near the most recently identified plume (adjacent to the new dry cleaning facility) has been put on hold until we can more adequately define our source area. This will require an additional site investigation that will be approved by PI project team (SouthDIV, EPA, SCHEC, PI).

If you remember we had TTNUS conduct some additional characterization work in January (?) due to increased concentrations in some of the downgradient wells. This resulted in finding what appears to be additional contamination near the new dry cleaning building. At this time we are unsure of the source of contamination and would rather not treat the originally proposed area until we have more fully defined the source.

The PFM is intended to help with the baseline characterization of any treatment as well as potentially assist in the characterization of the source area (such as time of release, etc.).

R,  
Cliff

-----Original Message-----

From: Koroma-Llamas.Lila@epamail.epa.gov  
[mailto:Koroma-Llamas.Lila@epamail.epa.gov]

Sent: Monday, August 21, 2006 9:21

To: Cummings.James@epamail.epa.gov; Mike Annable; Casey, Cliff C CIV NAVFAC SE; Kingscott.John@epamail.epa.gov; Kirk Hatfield; Mark Newman; matt.tilman@enviroflux.com; Howe, Robert -- EMI; Tisdale, Rob; Burhan, Younus -- EMI

Cc: Mike Annable; Casey, Cliff C CIV NAVFAC SE; Kingscott.John@epamail.epa.gov; Kirk Hatfield; Mark Newman; matt.tilman@enviroflux.com; Howe, Robert -- EMI; Tisdale, Rob; Burhan, Younus -- EMI

Subject: Re: Parris Island PFM Implementation Plan

Importance: High

Hi Jim,

Thanks so much for filling in for Cliff. It seems we do need to do some coordinating. I was under the impression that the PFM data gathering was only post injection, however this response sounds like you are going out pre-injection as well, to refine the conceptual site model and gather pre-injection data. I did not review the document, since it appeared you all were still making changes. I also assumed it would be incorporated into a Treatability Study Workplan. However, since you are needing to go out early, most likely before the TSWP is ready, then we will need this implementation plan before the TSWP, and it needs to be approved before it is implemented. Anyway, my Team will need a formal submittal of your Draft Final PFM Implementation Plan from the Navy (Art), so I have copied the Team on this e-mail, and hopefully Art Sanford, my Navy counterpart, can make the necessary contacts to keep this moving, and find out the status of the TSWP, rather than waiting on Cliff, since he will be out of town a lot. Art's number is 843-820-7465. Art, Jim's number is 703-603-7197. Jim, please let us know what kind of schedule you are on. That will help the team prioritize this work when it comes in. Art/Jim, if you have any questions or concerns, please give me a call.

Thanks,  
Lila  
404-562-9969

James

Cummings/DC/USEP  
A/US

To

Lila  
08/18/2006 04:55 PM  
Koroma-Llamas/R4/USEPA/US@EPA  
cc

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Subject

Re: Parris Island PFM  
Implementation Plan(Document  
link: Lila Koroma-Llamas)

Lila,

From previous e-mails got the impression that Cliff Casey was going to be on the road quite a bit, so am responding based on my understanding of where this passive flux meter effort is in relation to subsequent (potential) work.

The deployment of the flux meter is for the mutual possible benefit of both EPA and the Navy. EPA is interested in 'test-driving' the passive flux meter. The Navy is not particularly interested in the flux meter per se at the moment, but was willing to let us deploy the tool at Parris Island to see if it would assist in any way in the refinement of the conceptual site model. If it does yield any useful information, that information would be included to the extent appropriate in the Treatatability Study Workplan - OR if the TSWP is expected sooner than the PFM data , the PFM results might result in a revision to that document.

Subject to the results of the initial PFM work AND the availability of funding, we would like to consider deploying the PFM AFTER any treatment activity(s). Flux meter proponents are of the mind that a/the major utility function for the tools will be in comparing mass fluxes pre- and post-treatment.

I hope this clarifies the situation. We would like to plan to get the PFM's into the field in the desired timeframe. We would be happy to receive/respond to comments. If there were more to see in the implementation/installation, would be happy to arrange briefings/tours, but we were planning to only have staff on site to document the

installation and recovery.

As always, happy to discuss further as/if appropriate. I will be in all next week.

Regards/

Jim Cummings  
Technology Assessment Branch/OSRTI/OSWER USEPA (5102G) 1200 Pennsylvania  
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Lila  
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08/18/2006 04:32 PM  
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cc

Subject  
Re: Parris Island PFM  
Implementation Plan(Document  
link: James Cummings)

Hi folks,

Without rummaging thru my files, but acting solely on first gut reaction instead, I believe we are still waiting for a Treatability Study Work Plan for the secondary source zone to be provided for review and approval to the PI Partnering Team, via Art Sanford of the Navy. Just wanted to remind everyone of that. This PFM document was referred to as "final" in the distributing e-mail, however, I assume all or part of it will be included in the Treatability Study Work Plan (hint hint), and will be subject to review, comment and approval under the CERCLA program, before implementation can take place.

I state this more as a reminder than anything else. I have little expectation to request changes, but you never know...

Can someone (Cliff Casey?) let me know the status of the TS Work Plan?  
In case my memory failed me.....

Thanks,  
Lila

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08/17/2006 05:26 PM  
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Subject  
Re: Parris Island PFM  
Implementation Plan(Document  
link: Lila Koroma-Llamas)

I am generally pleased with the Implementation Plan.

In reviewing the outline for the final report, it was not clear to me where the discussion of site-specific results/interpretation would occur. Please clarify/amplify the outline as appropriate.

We have had various discussion regarding possible use of the tool to estimate source release timeframes. A recent e-mail described the capability as 'experimental'. Have we abandoned that avenue?

In a recent e-mail, Cliff Casey identified the need to address possible state UIC requirements/issues. Pls add this activity to the plan.

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