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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON U S NAVY RESPONSE TO
COMMENTS ON SITE MANAGEMENT PLAN FOR FISCAL YEAR 2007 MCRD PARRIS
ISLAND SC
10/24/2006
U S EPA REGION IV

Sladic, Mark -- NUS

From: Koroma-Llamas.Lila@epamail.epa.gov
Sent: Tuesday, October 24, 2006 3:35 PM
To: Sladic, Mark -- NUS; Sanford, Art F CIV NAVFAC SE; timothy.j.harrington@usmc.mil
Subject: SITE 53 = RE: Feedback on RTC, and SMP / Table Redlines

Attachments: deliverables(1).doc



deliverables(1).doc
(54 KB)

Hi guys,

For a quick answer, see the blue lines below. For explanation see full e-mail.

I don't mean to split hairs, but I interpret each status you provided slightly differently. Maybe it is not as you meant, but here is what I saw:

In the deliverables document you state -

Site/SMWU 53 Horse Island	PA	Document on hold pending incorporation of data following team concurrence on EMAC completion report on trash pick-up and confirmatory sampling.
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In the SMP status you state -

Status: Investigation in progress. A trash removal followed by confirmation sampling was conducted in FY05. The follow-up report is not yet completed.

In your RTC I asked and you responded -

1. Comment: Site 53. Status - Please identify the investigation by name (maintenance action?) and indicate that at least a PA will be needed for CERCLA.

Response: Based on the FFA, the unit must be resolved per CERCLA. The Team has previously agreed that once the trash removal confirmation sampling is complete, that data will be suitable for a PA. Regarding the name for the investigation, Navy and MCRD are aware that an earlier draft report incorrectly identified the activity, but this has not been resolved to date. No text changes are required

I am not trying to reject EMAC data for incorporation into the PA. The deliverables says "incorporation after concurrence", not that we have already "agreed that once the trash removal confirmation sampling is complete, that data will be suitable for a PA." I am simply saying that the SMP needs to state the status of the PA, not just the trash removal. At this point, if my records are correct in that the PA Report has been drafted but not yet completed, I would suggest you modify the SMP text as follows:

Status: Investigation in progress. A PA Report has been drafted and comments received. Subsequently, a trash removal followed by confirmation sampling was conducted in FY05. The follow-up report is not yet completed. Once completed, the confirmation data will be

incorporated into the Draft PA Report and resubmitted for final review and approval.

I would suggest you modify your RTC language as follows:

Response: Based on the FFA, the unit must be resolved per CERCLA. A PA Report has been drafted, but not yet completed. Once the trash removal confirmation sampling is complete, that data will be incorporated into the PA Report and resubmitted for review and approval. Regarding the name for the investigation, Navy and MCRD are aware that an earlier draft report incorrectly identified the activity, but this has not been resolved to date. The SMP text will be changed as follows: "Status: Investigation in progress. A PA Report has been drafted and comments received. Subsequently, a trash removal followed by confirmation sampling was conducted in FY05. The follow-up report is not yet completed. Once completed, the confirmation data will be incorporated into the Draft PA Report and resubmitted for final review and approval."

For the record, I have the following notes regarding status at Site 53 written some time ago. NOTE - I may very well be missing paper work.:

PA Work plan submitted and comments issued Dec 12, 2000. No record of RTC or approval letter, yet cover is green and dated August 2001.

PA Report submitted June 2002. EPA commented August 14, 2002. No record of RTC or approval letter.

EMAC 3,35,53,54 STATUS:

No record of EPA's comments nor any approval letter for the EMAC work plan. Apparently EPA commented on the EMAC work plan on December 8, 2004, but I do not have copies of comments. I have MCRDs letter which states they are submitting in response to EPA December 8 comments on the work plan, but again, no comments, nor RTC, were attached. Only change pages were included.

I commented on the draft REPORT in June of 2005. I have no record of responses to those comments. I have no record of approving the Report.

Art sent a draft path forward letter which I reviewed and commented on at the Aug.2005 meeting.

"Sladic, Mark --
NUS"
<Mark.Sladic@ttn
us.com>

10/23/2006 09:40
AM

To
Lila
Koroma-Llamas/R4/USEPA/US@EPA
cc
"Sanford, Art F CIV NAVFAC SE"
<art.sanford@navy.mil>
Subject
RE: Feedback on RTC, and SMP /
Table Redlines

Hi Lila - Art and I are still processing EPA's replies on our SMP deliverables. However, I did notice on EPA's feedback on RTC #24, EPA requested a record of the Team decision regarding the use of Site 53 data to conclude a PA. Please see attached. Hopefully, you recognize this handout as we have used a similar version (updated each meeting) since before your tenure. I highlighted the applicable portion. If necessary, I can probably find something in meeting minutes also, but believe that this is adequate to confirm that EPA has been on board.
Thanks.

Mark Sladic, P.E.
Project Manager
TETRA TECH NUS, Inc.
Telephone: (412) 921-8216
mark.sladic@ttnus.com (NEW EMAIL ADDRESS)

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

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

Sent: Tuesday, October 17, 2006 11:56 AM

To: art.sanford@navy.mil; hargrodc@dhec.sc.gov; koroma-llamas.lila@epamail.epa.gov;

SladicM@ttnus.com; stampsjm@dhec.sc.gov; timothy.j.harrington@usmc.mil;

mmcrae@TechLawInc.com

Subject: Feedback on RTC, and SMP / Table Redlines

Importance: High

Hi Folks,

I had to spend a lot of time consulting within EPA regarding the LUC RD and Completions, before I could provide feedback on these docs. You will see information about what/how I believe I can support the LUC RD concept, OU assignments, answers regarding CCRs, etc. If there are more questions after you study these redlines and notes, I think the Team should meet on this rather than go another round.

I have tried to make 99% of the necessary changes to the RTC, Draft SMP,

and SMP Tables, all in redline versions. I tried to highlight in yellow where you still have some work to do, or where you may want to look closely. I have also included a Word doc that walks you thru each comment and change. At times it seems easier to understand the redlines on the PC, but you should also be able to print them out. Whatever works for you. Call me if they are not showing right for you.

These redline changes, plus the few more needed in the yellow highlights, constitute an approvable document for EPA. However, they may not address DHEC concerns, and/or DHEC/Navy/MCRD may disagree.

Let me know if these changes cause any concern, and we can discuss ASAP.