

M00263.AR.000442
MCRD PARRIS ISLAND
5090.3a

EMAIL REGARDING U S EPA REGION IV COMMENTS ON STATUS OF INVESTIGATION AT
SITE 53 IN SITE MANAGEMENT PLAN FOR FISCAL YEAR 2007 WITH ATTACHMENT MCRD
PARRIS ISLAND SC
10/24/2006
U S EPA REGION IV

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> To
Lila
Koroma-Llamas/R4/USEPA/US@EPA
10/23/2006 09:40 cc
AM "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
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-----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.

Thanks,
Lila

(See attached file: SMP-redline text feedback.doc)(See attached file: Feedback on Draft RTC and SMP Redline.doc)(See attached file: RTC Draft SMP (3) feedback.doc)(See attached file: SMP Table 1 feedback.doc)(See attached file: SMP Table 2 feedback.doc)(See attached file: SMP Table 3

feedback.doc)
(See attached file: SMP Table 4 feedback.doc)

(See attached file: deliverables(1).doc)

MCRD PARRIS ISLAND
SUMMARY OF DELIVERABLES

SWMU/SITE	DOCUMENT	STATUS	Rank
SMP	SMP	RTC in Navy review.	
SWMU 12	EMAC Workplan + Restoration Addendum	Final comments incorporated; approval pending completion of ROD.	
Site 45 MWR Dry Cleaners	RI/RFI Addendum (10/05)	Team Review of RTC (RTC provided 12 April). Awaiting EPA reply to Navy's RTC.	6
SWMU 2	ROD	MCRD signed. Awaiting EPA signature.	2
SWMU 12	ROD (conventional)	Draft document with RTC in Team review.	4
SWMU 1 incinerator landfill	ROD	MCRD signed. Awaiting EPA signature.	3
SWMU 3 causeway landfill	Final Proposed Plan – groundwater sampling only	Navy/Marines review – to be updated per SWMU 12 PP and 1,2 RODs. LUC remedy – any remaining issues from communication cable trenching. Annual groundwater sampling in progress.	7
Site 3	Bike Path Info	To be distributed soon.	8
Site/SWMU 4, Site/SWMU 5, Site/SWMU 7, Site 9/SWMU 8, Site 13C/SWMU 13, Site/SWMU 16, SWMU 27, and SWMU 35	SI/CS RTC	EPA concurs with RTC. DHEC review of RTC concluded 23 March, with few additional comments. These are being addressed. Final report will also contain new data from recent field investigation at 7 and 13C. For 7/13C, DHEC provided wells permit, but has not technically approved work plan (work already completed). EPA provided verbal concurrence at November '04 Team meeting (see minutes). For SWMU 35, EPA has sampled and provided results. DHEC has provided comments on those results. Navy/Marines reviewing comments.	9
SWMU 1 incinerator landfill	Construction Completion Report	EPA comments received; RTC provided. SCDHEC review in progress. Pending ROD/LUC RD completion. Primary Doc.	
SWMU 1 incinerator landfill	LTM WP	Final document/RTC distributed April 13 2004. DHEC approval received 5 Jan 05. EPA final concurrence in progress – to be provided after ROD signature. EPA approval to include requirement to count only live stems. May require reference to LUC (TBD).	
Basewide	LUC RD	TBD	

Site 21 OWS	RFI	EPA and NOAA have provided comments. DHEC has provided comments, sent to different Navy POC. DHEC to re-send comments to Art/Team. As of 1 June 05 conf call, RI likely to be converted to PA/SI following MCRD pull unit, UST sampling regime, incorporate new data.	
Site 21 OWS	PP/ROD	OLD PATH: Draft PP being developed – plans for Navy/Marines review to start by end of May, 2005. NEW PATH (post 6/1 conference call): No PP/ROD imminent.	
Site 45	EZVI WP (Phase II) Includes phase I report	Team review (provided __April).	5
Site 45	Columbia/ Regenesis WP	TBD	
Site/SWMU 55 FOV vault	Final Report /RTC	EPA has concurred with RTC and final report. DHEC review of final report and RTC in progress.	
EMAC completion report for Sites 3, 35, 53, and 54.	Draft completion report.	EPA comments received. RTC in progress. SCDHEC review in progress.	
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.	
Old stuff – to be deleted from list at next revision:			
Site 45	Navy EZVI Workplan	EPA concurrence received (email 1 Jun 05); SCDHEC review in progress.	
SWMU 12	EMAC Workplan + Restoration Addendum	Approvals received.	
Site 45 MWR Dry Cleaners	RI/RFI (2004)	Approvals received.	
Site 45	TtNUS TW WP	Submitted 31 January 06, Team Review. Work scheduled for 14-21 February. MW Permit required, but field activities addressed under 11/04 45 WP.	
		AUGUST 25, 2006	