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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV CONCURRENCE WITH U S NAVY DECISION TO
DEVELOP PROPOSED PLAN AND FINAL RECORD OF DECISION FOR SITE 3 CAUSEWAY
LANDFILL MCRD PARRIS ISLAND SC
1/8/2007
U S EPA REGION IV

From: Koroma-Llamas.Lila@epamail.epa.gov
To: Sanford, Art F CIV NAVFAC SE; hargrodc@dhec.sc.gov; Sladic, Mark -- NUS; mmcrae@TechLawInc.com; stampsjm@dhec.sc.gov; Beverly, Stephen A CIV NAVFAC SE; timothy.j.harrington@usmc.mil
Subject: RE: MORE ON: Action Items
Date: Monday, January 08, 2007 12:20:06 PM

Hi Folks,

I support the Navy/Marines decision to develop a Proposed Plan and Final ROD for Site 3. I assume this gives you what you need for submittal of the SMP. However, I have not seen an example shared from Cecil Field for the LUC closure letter. Could you not find one on your side? I have made calls again to see if I can catch someone here in town now.

Thanks,
Lila

"Sanford, Art F
CIV NAVFAC SE"
<art.sanford@navy.mil>
01/03/2007 02:13 PM
To
Lila
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Stephen A CIV NAVFAC SE"
<stephen.beverly@navy.mil>,
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cc

Subject
RE: MORE ON: Action Items

Team,

The Navy/Marine Corps folks recently discussed the three different approaches to documenting the final agreed upon site remedy for Site/SWMU 3 addressed in Lila's email below.

The following points were brought out during that discussion:

That the Proposed Plan for the Soils Interim Remedial Action at the site specifically states that sediments will be addressed in a

future Proposed Plan and Record of Decision;

That the follow-on Interim ROD for site soils states in various sections (e.g., 1.2 & 2.4) that a final ROD will address contaminated sediments at the site;

That rather than "changing" (i.e., significantly differing from) the preferred alternative and interim remedy for soils described in those two documents, what we are really doing is adding a remedy for media which the Team purposefully chose to exclude (i.e., site sediments) just as if the Team had created a separate OU for that (as other bases have done for base wide GW). Thus, it would not appear that doing an ESD to turn the soils IROD into the final ROD covering all media would be the appropriate approach to take;

EPA ROD Guidance (Section 7.3.3.) indicates that a revised Proposed Plan with public participation would be required in connection with doing any ROD amendment (option #2 below) so there would not seem to be any real advantage to using that particular approach;

MCRD would prefer that there be 1 final decision document for all media at the Site for ease of future site remedy referencing and for future compliance with associated LUC requirements.

Therefore, the Navy/Marine Corps believe the best approach to take to fulfill our CERCLA lead agency and FFA related obligations would be for us to develop a Proposed Plan to address the excluded sediment remedy at Site/SWMU 3 (with the requisite public review and comment process) followed by development and execution of a Final ROD addressing all media at the Site (based upon the Team's then 2 Proposed Plans and any associated public input).

Although we do not believe that such an approach obligates us to revisit the LUCs component of the already agreed upon soils remedy for the site, in order to facilitate MCRD's future compliance with LUC's base-wide, we are amenable to updating the previous IROD's discussion of site LUC's / use of LUC RD approach and future groundwater monitoring. That way, the Site/SWMU 3 ROD LUC provisions will be consistent with the recent Site 1 and 12 RODs. Our counsel has recommended that the final ROD also clarify that future Five Year Reviews while required, are not an actual component of the selected site remedy as the IROD currently implies.

Art

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

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

Sent: Wednesday, December 20, 2006 11:03

To: Sanford, Art F CIV NAVFAC SE; hargrodc@dhec.sc.gov;
koroma-llamas.lila@epa.gov; mark.sladic@ttnus.com;

mmcrae@TechLawInc.com; stampsjm@dhec.sc.gov; Beverly, Stephen A CIV
NAVFAC SE; timothy.j.harrington@usmc.mil
Subject: MORE ON: Action Items

Hi Folks (and Steve) again,

I spoke with David again this morning, and then with Steve and Art, and then with Jerry. This is to document what was discussed regarding the remaining action items:

* Site 3 resolution - There are three possible approaches to finishing Site 3. Each approach brings with it different requirements. The following briefly describes each approach and related requirements, however, the ROD Guidance should be followed for official submissions. They are :

1) Issue a Final ROD - If the Navy/MCRD chooses to issue a Final ROD, it would necessitate the development and issuance of a Proposed Plan, as well as the public notice, review and comment process. The ROD would need to follow complete ROD guidance requirements.

2) Issue a ROD Ammendment, ammending the Site 3 Interim ROD - If the Navy/MCRD chooses to issue a ROD Ammendment, it would require Notice of Availability and public review and comment for the Ammended portion only, I believe. The Ammendment would need to address 1) A description of the additional sampling results, the findings that no further remedy or cap/cover was necessary and a determination that the remedy is Final, rather than interim; 2) Updated LUC language, as used in RODs 1 and 5 (Site12); and 3) Findings regarding the need/lack of need for monitoring sediment, and more detail on the monitoring requirements for GW.

3) Issue an Explanation of Significant Differences (ESD) for the Site 3 Interim ROD - At this point, EPA and SCDHEC would support this approach, however, we are awaiting some feedback from EPA HQ. If the Navy/MCRD chooses to issue an ESD, the ESD would modify the Interim ROD in the same way as described above in the ROD Ammendment approach, however, an ESD would only require a Notice of Availability of the ESD, but would not require a Public Review and Comment Period.

My understanding is that after the calls this morning, Steve wishes to review the ROD guidance and the NCP, consult with Art and Tim, and make a determination as to what they are comfortable pursuing, however, they seem to be leaning towards the ESD approach. In order to be able to move forward on the SMP, once decided, the Navy/MCRD will submit the SMP reflecting their chosen route. If the Navy/MCRD chooses the ESD approach and at some point we hear back from EPA HQ with significant objections (not likely), we have the understanding that we will revisit the SMP on that point only.

* LUC RACR "Letter" examples - The EPA FLA/AL/MS Section Chief has stated that this "Letter" approach was used at Cecil Field. Unfortunately, there are two EPA RPMs on that site, and both are out of the office. Today is my last day in the office until after the holidays. Steve offered to attempt to obtain copies of examples from his counterparts, and perhaps Art will try also, and share them with the team if they are successful. I offered to draft a sample letter, but Steve and Art preferred to pursue finding the existing examples. Therefore, this reassigns my action item to Steve and Art for the mean time. If I return from the holidays and the sample has not been found,

I will make another attempt within this office.

That should answer all that is needed for submittal of the SMP, as well as all that is needed for now on my action items.

Call me with questions today..... otherwise.....

YOU ALL HAVE A WONDERFUL HOLIDAY!!!!!!

LILA

Lila
Koroma-Llamas/R4
/USEPA/US

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To