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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT FINAL SITE
MANAGEMENT PLAN FOR FISCAL YEAR 2008 MCRD PARRIS ISLAND SC
6/28/2007
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960**

June 28, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
4WD-FFB

Commander, Southern Division
Naval Facilities Engineering Command Southeast
OPCEVR (IPT-Central)
Attn: Mr. Arthur F. Sanford
Remedial Project Manager, MCRD Parris Island
2155 Eagle Drive
North Charleston, S.C. 29406

And

Commanding General
Marine Corps Recruit Depot
Attn: Timothy J. Harrington, NREAO
P.O. Box 5028
Parris Island, SC 29905-9001

**SUBJ: EPA Review of D1 Draft FY08 Site Management Plan (SMP) for MCRD, Parris Island, SC
(submitted via e-mail dated June 8, 2007).**

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document and offers the following comments:

- 1) EPA recognizes that several documents are due near the very end of FY07. Therefore, this SMP may need to be revisited at the beginning of FY08, to account for slippage of FY08 documents due to any predecessor documents which might have missed the FY07 deadline date. However, requests for changes to deadlines for FY07 documents should be made via extension requests letters, not through the FY08 SMP.
- 2) Page 8, first line: Delete the word "first" appearing before "Amendment".
- 3) Site 1, Page 10, Status, Line 2: Please change "Remedial" to "Physical" construction is...
- 4) Site 3, Page 11: It should not take 3 months after completion of the ROD to issue the LUC RD and LUC RACR. Please consider moving the dates up some, to help ensure we make these deadlines within the FY08 timeframe, for targeting purposes.

5) Site 5, Page 12, Status: The FY07 SMP stated funds were targeted, but unsure, for FY08. On March 6, 2007, at the Tier I meeting, the Navy stated that funds for Site 5 had been requested for FY08, but there would be an FY09 RI/FS Work Plan submittal date. Now the FY08 SMP still states that FY08 funds were requested, but Table 2 Near-term Milestones indicate RI/FS Work Plan submittal in FY10. Please explain any changes in funding, justify the duration between FY08 funding and an FY10 RI/FS work plan submittal since the text indicates minimal contamination, and/or correct document text if there are errors which negate this issue.

6) Site 8, Page 13, Status: The FY08 SMP states the path forward is under review. Please explain and expand. Site 8 was not part of the EMAC action, nor is it in the SI/CS report. In what way is it under review?

Also, on March 6, 2007, at the Tier I meeting, the Navy stated that funds for Site 8 would be requested for FY08, but there would be an FY09 RI/FS Work Plan submittal. Now the FY08 SMP shows nothing as a document milestone. Please explain any changes in funding, and why there is no milestone, even in the out years.

7) Sites 9/16/27/55, Pages 13/15/16/17/22, Deliverables Table, as well as Tables 1 and 2: See comment #1. The RI/FS Work Plan currently has a Deadline date of June 30th, 2007. If the navy/MCRD does not feel it can meet this date, a request for extension letter should be submitted immediately, with a proposed date which would still accomplish the work this fiscal year. Please remove all of the RI/FS Work Plan / submittal dates from the referenced Tables, as well as Tables 1 and 2 of the SMP.

8) Site 12, Pages 14, Deliverables Table, as well as Tables 1 and 2: See comment #1. The LUC RACR Letter currently has a Deadline date of September 17, 2007. If the navy/MCRD does not feel it can meet this date, a request for extension letter should be submitted at a time closer to that date. Please remove the LUC RACR letter and submittal dates from the referenced Deliverables Table, as well as Tables 1 and 2 of the SMP.

9) Site 13, Page 14, Status: Please explain the change from FY07 "Funding approved for FY07" to "Funding expected for FY11", before a determination regarding approval can be made.

10) Site 14, Page 15, Status: Please explain the change from FY07 "Funding approved for FY07" to "Funding expected for FY10", before a determination regarding approval can be made.

11) SWMU 21: Please clarify the schedule/priority for UST to address this.

12) SWMU 32, Page 17, Deliverables Table: For consistency, please change "None" to "See Site 45 for deliverables information".

13) Site 45, Page 19, Deliverables Table: EPA stated at the time that a request was made to extend Site 45 EZVI studies, that this extension should not delay development of the FS. Also, the USGS study should be presenting findings in July and September of 2007. EPA feels this should be discussed at our next Tier I conference call. In the mean time, EPA requests that the Deadline for the Site 45 FS be placed back in at the currently negotiated date of 19 June, 2008; and the proposed plan back in at the previously negotiated date of 28 December, 2008; and the ROD back in at 23 October, 2009. EPA proposes we discuss this on the July 27 conference call or the next meeting.

14) Site 50, Hue City Range: EPA feels the SMP should have something somewhere that speaks to the current status of MCRD Ranges/UXO sites (maybe a new table at the end)?

15) Tables 1, 2 and 3: Please update based on above comments and requested changes.

16) Table 4: Please explain how the Navy/MCRD prioritizes and schedules PA/SI work. EPA feels the SMP should speak to scheduling and moving forward on our sites which still need a PA, SI (including reports being finalized), and interim actions (e.g. EMAC report)?

This concludes EPA's comments. If there is any way EPA can assist in helping you to address these comments or to meet milestones, please do not hesitate to call me at (404) 562-9969.

Sincerely,



Lila Llamas
Senior RPM

cc: Meredith Amick, SCDHEC
Don Hargrove, SCDHEC
Mark Sladic, TtNUS