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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENT ON DRAFT SITE MANAGEMENT
PLAN FOR FISCAL YEAR 2008 MCRD PARRIS ISLAND SC
7/13/2007
U S EPA REGION IV

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Subject: One Additional Comment: EPA Comments on D1 Draft FY08 SMP
Date: Friday, July 13, 2007 4:40:21 PM

Hi folks,

Was just looking back at my comments, and thinking about extension letters and what a pain they are, and realized I should have put something in my comments that I had left out. We need to check the duration times between Draft and Draft Final to make sure they are not too tight. If they are, I would recommend moving the first draft date up, as opposed to the Final Draft date out. We still want to accomplish what we had planned for the year. Therefore, I submit for your consideration one additional comment, repeated from the FY07 set of comments, if it is not too late:

1a) FY08 SMP Table 2 (and the Document Review Schedule we use at team meetings). The FY08 Primary Document Deadlines need to be scrutinized regarding the time between a Draft and Draft Final submittal ensuring they are not too tight for some documents. Based on EPA needs, EPA requests the following:

- The FFA states that the document review timeframes can be established in the SMP. EPA's contractor is generally allowed 30 days for document review according to the Branch-wide contract. In order to allow review and incorporation of contractor comments together with program and legal comments, EPA is hereby requesting 45 days for review of Draft Primary Documents. This should minimize the need to request 20 day extensions.
- EPA believes this is the Team's opportunity to manage our work load and establish due dates that allow us to maintain current practices, if that is desired (e.g. the practice of waiting for RTC feedback before issuing a redline/strikeout version, and sending that prior to getting Draft Final signatures.) In order to do this, EPA is requesting the Navy review all Draft Final Document Submittal Dates and ensure they are set at least 120 days out from the Draft Document Submittal Date (allowing for 30 + 15 extra days (see a above) for commenting, and 30 + 30 + 15 extra days for RTC Feedback/redline sharing), thus minimizing the Navy's need to request extensions. This doesn't mean that EPA/DHEC will always take 45 days, nor that the Navy will always take 75 days, but it means the days are there to manage and use as the team needs.

THAT'S ALL. THANKS.