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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV REQUEST FOR EXTENSION OF REVIEW TIME
FOR DRAFT PROPOSED PLAN FOR SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND
SC
8/24/2007
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

August 24, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SD-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: Dr. Heber Pittman, NREAO
P.O. Box 5028
Parris Island, SC 29905-0028

SUBJ: Request for Extension of Review Time for the Site 3 Proposed Plan Draft document, submitted in part on July 24th, 2007, and the remainder on August 2nd, 2007.

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) Region 4 received a partial submittal of the Site 3 Proposed Plan (PP) on July 24th, 2007. EPA received the remainder of the Proposed Plan on August 2nd, 2007. In accordance with the Federal Facility Agreement (FFA), EPA has 30 days to review and provide comments or approve a primary document. In accordance with that thirty day clock, starting from the day after the date of submittal of the final portion of the Proposed Plan on August 2nd, 2007, EPA comments would be due to the Navy and Marine Corps Recruit Depot (MCRD) on Saturday, September 1st, 2007. However, the FFA also states that in the event the Site Management Plan (SMP) establishes a review and comment period different from the thirty days, the review and comment period shall be as reflected in the SMP. The FY 07 SMP states that should any due date fall on a weekend or holiday, it shall be considered to be due on the next official business day. Being that Saturday, September 1st is a weekend as is Sunday September 2nd, and being that Monday September 3rd is a holiday, the next official business day is Tuesday, September 4th, 2007, upon which comments are considered to be due.

EPA's review to date has brought to light many issues of concern with respect to the administrative record in support of the Site 3 PP, completion of draft documents, monitoring requirements, etc. A conference call was held today to try and resolve some of these issues so that comments could be submitted. However, at the end of the call several issues were left pending. One pending issue was

resolution of monitoring requirements. Since the time of the call, EPA has been made aware that due to conflicts in schedules and availability, the discussions necessary to facilitate resolution of this matter will not happen within a timely enough manner in which to meet the comments due date of September 4th, 2007. Additionally, the issue of finalizing documents to complete the administrative record in support of the Site 3 PP was left pending, with a request to accept meeting minutes and a letter from the Navy, in lieu of finalizing the Post IROD Risk Assessment Tech Memo. At this time EPA cannot accept these as sufficient for supporting the PP.

As agreed to on the call today, EPA has clarified with the Navy/MCRD and the South Carolina Department of Health and Environmental Control (SCDHEC) that this round of comments will be General in nature, due to potentially extensive rewrites being required in order to revise the PP to reflect the current state of decisions and remedy selection at MCRD Site 3. However, resolution of at least the monitoring issue is needed before even these general comments can be finalized.

Therefore, EPA is hereby requesting a 20 day extension to the comments due date, to allow the Navy and MCRD to resolve monitoring issues, and to determine an acceptable path forward for the administrative record, so that EPA can finalize comments. This request is being made in accordance with Section 8.2 of the FFA, paragraph a., which states "Either EPA or the State may extend this initial review and comment period by an additional twenty (20) Days (or longer if mutually agreed to by all Parties) provided written notice of the extension is delivered prior to the end of the review and comment period." Since this extension request is limited to the 20 days provided by this paragraph, it is not subject to agreement by all parties. A twenty day extension, counting forward from the current due date of September 4th, 2007, results in a comments due date of September 24th, 2007.

EPA looks forward to resolution of these PP issues and will be available for whatever consultation is needed by either SCDHEC or the Navy/MCRD in order to facilitate this. If you have any questions regarding this matter, please call me at (404) 562-9969.

Sincerely,

Lila Llamas, Senior RPM
Federal Facilities Branch
Waste Management Division

cc: Meredith Amick, SCDHEC
Joe Bower, SCDHEC
Mark Sladic, TTNus