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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
1/4/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

January 4, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SD-FFB

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Charles Cook
PO Box 30
North Ajax Street, Bldg 135
Jacksonville, FL 32212-0030

And

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs
Attn: Heber Pittman
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the Draft Final FY08 Site Management Plan (SMP) (Cook cover letter dated November 19, 2007; document dated 22 October, 2007).

Dear Sirs:

EPA has reviewed the FY08 SMP and the associated Response To Comments (RTC). The review has resulted in this conditional approval letter, which contains some final comments which do not require a response, and conditions which must be met in order for this approval to remain in effect. The Navy/MCRD has until January 23rd, 2008 to respond to this conditional approval, providing the requested final changes which were previously omitted, and/or negotiating revised acceptable final language, either one to be submitted via change pages. EPA's comments and conditions are as follows:

Comments:

1. The Response to Comment 1a is not acceptable. The Draft Final SMP still does not have specific language modifying review/response times (although the document schedule

allows for it, the text must indicate the specific changes to review times). EPA has drafted language to be inserted into the Draft Final SMP. EPA is proposing this be added as letter paragraph "d" to the document at the end of Section 2, after the letter "c" paragraph response. This language was previously submitted to the Navy/MCRD in a Word file attached to EPA's November 9, 2007 e-mail. (See Conditions below.)

2. The Response to Comment 6 is not acceptable. EPA requested the status of Site 8 be specified with respect to the CERCLA process and funding issues explained. Additionally, a quick glance at Table 4 reveals that no other Site has simply an "under review" clarifier. Even if funding is questionable, the Navy/MCRD needs to clarify what is needed at each site. (See Conditions below.)
3. Based on discussions at the last Partnering meeting, Navy/MCRD will consider pulling SWMU 21 finalization back from the UST program, so that funds can be obtained and work can be continued. No changes are needed for this SMP, but this should be addressed in the Draft FY09 SMP due June of 2008.
4. Based on discussions at the last Partnering meeting, EPA understands that the Navy/MCRD is assessing Ranges, and a report will be forthcoming. EPA believes that report will be useful in determining which ranges should be listed in the SMP. EPA agrees to defer this accounting of sites until the Draft FY09 SMP, due June of 2008.
5. Table 4 – Site 3 needs to be added back onto Table 4. If EPA included it in previous instructions to be removed, it was a mistake. Also, Site 8 Status needs to be updated (see above). (See Conditions below.)

The FY08 SMP is approved provided the following conditions:

Conditions for Approval:

1. EPA has drafted language to be inserted into the Draft Final SMP. Add the following language as letter paragraph "d" to the Draft Final document at the end of Section 2, after the letter "c" response paragraph and submit resulting change pages by January 23, 2008. Since EPA has just drafted this language, if the Navy/MCRD wishes to modify the language, this can be negotiated up until that date.

"d. As allowed for in Section 8.2 (a) of the FFA, the Parris Island Partnering Team has agreed to revise the review and comment periods for EPA and SCDHEC, as well as the response to comment and revision periods for the Navy/MCRD, on an annual basis as part of the SMP amendment process. This year the Team has agreed to timeframes as identified in the following table:

<i>Document D1 - Draft Due</i>	<i>EPA/SC Comments</i>	<i>EPA/SC Written Extension</i>	<i>Navy/MCRD RTC and Draft Final</i>	<i>Navy/MCRD RTC and D2 Draft Final</i>	<i>Navy/MCRD Written Extension</i>	<i>Approval or Dispute</i>
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		<i>Request</i>	<i>scoping</i>	<i>Deadline</i>	<i>Request</i>	
<i>On or Before SMP Deadline Date for Draft Document Submittal (D1). See Table 2.</i>	<i>Due within 45 days of receipt of D1 Document.</i>	<i>20 days automatic; more upon approval of other FFA parties.</i>	<i>Within 75 days after comment period closes (including extension period if this applies) and before RTC/Draft Final Due Date.</i>	<i>On or Before SMP Deadline Date for Draft Final Document Submittal (D2). See Table 2.</i>	<i>20 days automatic; more upon approval of other FFA parties per Section XI of the FFA.</i>	<i>D2 is either approved or the dispute process should be initiated.</i>

The document review and comment periods should also be reflected in each Fiscal Year's Cooperative Agreement Work Plan to be developed by the Navy and SCDHEC in consultation with U.S.EPA, consistent with requirements of the Department of Defense and State Memorandum of Agreement (DSMOA)."

2. Make the necessary changes requested in EPA's comment #6. On page 13, specifically state what is needed next for Site 8 (PA, SI, etc.) Explain the current status and intentions for funding requests. Submit resulting change pages by January 23rd, 2008.
3. Add Site 3 back onto Table 4. Update the Site 8 status consistent with your findings for the above condition. Submit the resulting change pages by January 23rd, 2008.
4. Ensure SCDHEC's comments are addressed in your changes and submit those resulting change pages by January 23rd, 2008.

The Navy/MCRD should respond to this letter, providing the requested change pages by January 23rd, 2008. If acceptable change pages have not been received by that date, this conditional approval shall be considered null and void.

EPA appreciates the coordination efforts put forth by the Base and Navy in developing a Site Management Plan as comprehensive as this one. If there are any questions, please do not hesitate to contact me at (404) 562-9969 about these comments and conditions.

Sincerely,

Lila Llamas
Senior RPM

cc: Meredith Amick, SCDHEC
Sommer Barker, SCDHEC
Mark Sladic, TtNUS