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MCRD PARRIS ISLAND  
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON CONSTRUCTION OF SEWER  
LINE THROUGH SITE 12 JERICOHO ISLAND DISPOSAL AREA MCRD PARRIS ISLAND SC  
4/23/2008  
U S EPA REGION IV

**From:** [Koroma-Llamas.Lila@epamail.epa.gov](mailto:Koroma-Llamas.Lila@epamail.epa.gov)  
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**Subject:** Lila RE: JERICO ISLAND SITE 12/SWMU 10  
**Date:** Wednesday, April 23, 2008 3:52:34 PM

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Exactly .... the devil is in the details.

I was saying wait for Broome because I have no idea what he will say about a pathforward from the current state. I too assume some additional planting/grading to meet the success criteria, but you never know. That is why we are asking an expert. What I suggest is that we ask the expert about two scenarios now, 1) pathforward from the current state, and 2) pathforward from a disturbed state assuming BJWSA highly impacts the areas (it would be nice if we knew exactly what the nature and extent of their projected impact would be.) These two scenarios may end up getting the same answer.

Otherwise, we could hold off on Broome, and have him tell us what BJWSA needs to do after they have impacted. Not sure if that works with your contract (or whatever privatization mechanism is used) for holding them responsible if we do not know up front what they need to do. Your call on that.

When you ask about short-term impact consideration with respect to success criteria, I assume you mean to ask will we hold you to a schedule that is no longer realistic because you are starting over? If that is what you mean, I would think we could work it out. May depend on the timeframes involved. Any insight on that? If you mean will we have different success criteria against which we measure, I would think not.

Ditto the short term .vs. long-term maintenance concerns. Not sure what exactly will be on the island to maintain.....

Lila

"Harrington CIV  
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Subject  
RE: JERICHO ISLAND SITE 12/SWMU  
10

Lila,

Okay, then we'll aim for the fill areas, regrade them, plant with nursery stock...life will be good.

Pending Dr Broome's counsel, can the short-term impacts of construction be considered when looking at the success criteria for revegetation. I understand that the Depot/Navy is still on the hook for marsh restoration. In the back of my addled mind, I thought that we were going to have to have some additional planting/grading to achieve the original success criteria. Accordingly, I thought BJWSA could do their work and restore the marsh per Dr Broome's guidance as they withdraw from the site. As always, the devil is in the details.

The site access question is more of a challenge. I am comfortable with the short-term construction access, however, long-term access for operations and maintenance is a little different. If BJWSA has done the marsh restoration, then maybe they are less likely to harm it if they have to access Jericho Island in the future.

V/R, Tim

V/R,

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

From: Koroma-Llamas.Lila@epamail.epa.gov

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

Sent: Wednesday, April 23, 2008 13:45

To: Harrington CIV Timothy J

Cc: Meredith Amick; Sommer Barker; Cook, Charles CIV NAVFAC SE; Pittman CIV

Darrel H; diane\_duncan@fws.gov; Kelly Taylor; kraemerdt@tampabay.rr.com; mmcrae@techlawinc.com; SladicM@ttnus.com; Tom Dillon; wendtp@dnr.sc.gov  
Subject: Re: JERICHO ISLAND SITE 12/SWMU 10

Tim, (and team)

Speaking unofficially and without consulting NOAA yet  
.....

As far as "Use" goes, obviously you must abide by what is restricted in the ROD and the LUC RD. The following are the Land Use Controls for Site 12:

"The ROD for Site 12 established the following LUC Performance Objective:

Prohibit extraction or any use of the groundwater beneath the Site. "

So long as the work is done without breaching this LUC, it should be an allowable "use" with respect to CERCLA and Site 12. However, you must meet all other ARARs for this specific activity.

Having said that, it is also important to recognize that you have revegetation and monitoring requirements which must still be met and are ongoing. You must meet those requirements regardless of the impact from this other activity.

"Conceptually", I suggest we wait to hear from the Professor before we make this decision. We do not want to make it worse or cause more work than necessary. At the same time, if it buys you something by letting them mess it up again so we can see if they can get it right, that would seem reasonable, AFTER considering the Professor's pathforward. But understand that the ROD also calls for you to restrict access, so this would in no way relieve you from the ultimate responsibility of meeting the revegetation requirements.

Furthermore, still "conceptually speaking", if avoiding "remediated areas" causes additional damage to the marsh above and beyond the current not-so-successful revegetated areas, I would think we would want to aim for the remediated areas (see paragraph above) as opposed to avoid them, and allow the remainder of the marsh to be unaffected, if that is possible in the design for this project. Wouldn't you think?

Without knowing more about the process and proposed design I can't say any more.

Clear as sediment?

Lila

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Subject  
JERICHO ISLAND SITE 12/SWMU 10

Team,

As you may recall, MCRD Parris Island is undergoing privatization of our water and wastewater utility systems. Part of the privatization involves connecting our wastewater system to the regional treatment facility, located about midway between the Parris Island gate and Wal-Mart. The plan by Beaufort Jasper Water and Sewer Authority (BJWSA) is to directionally-bore under the marsh, from a point adjacent to the traffic circle, to a point somewhere along the highway. That distance challenges the limits of the technology. They would also like to be able to consider having the boring exit the marsh on Jericho Island. Going through Jericho Island reduces the length of the boring by about 1500 feet (20%). Conceptually, would there be any objection to having the sewer line pass through Jericho Island, as long as it did not impact any of the areas that were actively remediated? Additionally, the work would have a temporary impact on the causeway restoration area. However, I think that we could use it as a second chance to re-set the marsh elevation and replant that restoration area.

Just looking for some initial reaction regarding whether or not Jericho Island is a viable option for BJWSA.

V/R, Tim