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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT SITE MANAGEMENT
PLAN FOR FISCAL YEAR 2009 MCRD PARRIS ISLAND SC
9/15/2008
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

September 15, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SF-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: Draft FY09 Site Management Plan (SMP), MCRD, Parris Island, South Carolina (June 2008)

Dear Sirs:

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

1) **Tables and DUE DATES in text throughout document** – Reconcile dates in the text and Tables with the most recently approved dates from either recent SMPs, or from recent extension request letters. Be sure to footnote dates which are based on approved extension request letters. Reconcile dates in the text with dates in Tables 1, 2, and 3. Reconcile Table 1 with Tables 2 and 3. Please make all dates concur as an end result.

2) **INTRODUCTION, last paragraph, page 5** – Please replace “Fiscal year 2008; and that are projected for Fiscal year 2009 and beyond...” with “the current fiscal year; and that are projected for the next FY and beyond...”.

3) **ANNUAL UPDATING, letter b., page 7** – Letter b, please update the “FY07” reference to language that either does not need updating annually, or be specific to this FY’s language needs.

4) **ANNUAL UPDATING, letter d, page 8, and the Uniform Policy Pages 11/12** – While it is understood that the Navy’s intention is to implement the SAP/QAPP process in accordance with joint guidance, EPA is not familiar with this abbreviated form of that guidance. Inclusion of “Guidance” which is subject to change is not appropriate for inclusion in a Site Management Plan. EPA and the Navy follow a multitude of guidance documents while implementing CERCLA/RCRA activities. While not appropriate for the SMP, it would be appropriate for submittal to the team under separate cover, and should be done so, along with proposing an agenda item to discuss the process and its’ potential impact to the schedule at the next Team conference call or meeting. EPA understands there is a learning-curve during the implementation of new guidance and will consider its impact accordingly. Meanwhile, please remove the text from the next version of the SMP. If the Navy feels strongly that this guidance is in conflict with the current review schedule in letter d, page 8, the Navy should feel free to propose a special review schedule for SAPs/QAPPs as an addendum to the letter d chart, based on the understanding of the schedules called for in the new SAP/QAPP guidance.

5) **Site 3, Page 14:** Please modify the status paragraph to read “... should be updated to address post-remedy conditions and current exposure scenarios.” Delete the next to last sentence in the paragraph which starts “That document...”. Add to the last sentence, “... if found to be necessary.” Under FY 09 Primary Deliverables and Due Date, note the PP D2 was due 7/14/08, the ROD D1 is due 11/22/08, and the ROD D2 is due 2/5/09. Then footnote these to explain that an extension will be requested for these.

6) **Site 4, Page 14, Status:** Prior to the last sentence, add a sentence which captures what the Navy has proposed for the additional investigation

7) **Sites 5, 7, and 14; Pages 15 and 18:** Reconsider these dates and move these documents so they are spread out more from each other. The proposed timeframe is not realistic if these are now to be handled through separate documents. Please explain the change in strategy from what the team previously agreed to with respect to site-wide sediments.

8) **Sites 9/16/27/55, Pages 16/19/20/25, Status and DUE DATE, as well as Tables 1 and 2:** Each status section ends with the same statement. Please change the last sentence for each site status to read “Even though an RI Work Plan Addendum is a primary document, since the original RI work plan was already approved and implemented, and since these sites are of such a high priority to the Navy and MCRD to be driven by MilCon concerns and schedules, it was found that a milestone due date for the addendum work plan was not necessary.” Modify the date for the RI Report D1 in Table 2 to be 10/30/08 and footnote it to be in accordance with the approved extension requested via letter dated July 11, 2008. Make the changes in Tables 1 and 2 as well. Also note, submittal of the RI Report D2 in July of 2009 gives sufficient time to make the revisions; however, this may or may not delay approval to construct on site.

9) **Sites 13 and 14:** Resolve the conflict regarding the OWS. Please clarify how Elliot’s Beach OWS is to be addressed. Also, for Site 13, please clarify if the next step is an Extended SI or an RI/FS in accordance with previous documents.

10) **Site 45, Page 22, Status:** Delete “RI Complete.” Please change the Status to indicate that the Original RI Report was conditionally approved contingent upon submittal and approval of an RI Addendum Report which would resolve issues. Also, in the last sentence please add “Emulsified” before “zero”.

11) **Site 50, Page 24, Status:** Please modify to read "... under CERCLA/RCRA and applicable...."

12) **Site 53, Page 25, Status:** Add a statement that trash still remains on site, ESVs were exceeded, and a pathforward needs to be determined. Add a statement which reflects the risk level assigned to this site by the Navy.

13) **Site 54, Page 25, Status:** Explain why there is a change here from what was discussed with respect to site-wide sediments and closure for this Site. Explain if the low relative risk determination includes consideration of possible contaminants in the marsh and impact to the ecosystem.

14) **Table 1:** In addition to previous comments, add Site 7 and Elliot's Beach OWS to Table 1 rows. Also, in the Notes column, please clarify which site will address the Elliots Beach OWS and add "With Elliot's Beach OWS", etc. to the column.

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
Federal Facilities Branch
Superfund Division

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