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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV APPROVAL OF U S NAVY RESPONSES TO
COMMENTS ON SITE MANAGEMENT PLAN DRAFT 1 REVISION 1 WITH ATTACHMENTS
MCRD PARRIS ISLAND SC
11/3/2008
U S EPA REGION IV

From: Koroma-Llamas.Lila@epamail.epa.gov
To: [Sladic, Mark](#)
Cc: [meredith amick](#); [Cook, Charles CIV NAVFAC SE](#)
Subject: Re: MCRD Parris Island SMP RTC letters
Date: Monday, November 03, 2008 5:25:16 PM
Attachments: [Response to Comments SMP D1 SCDHEC R1.doc](#)
[Response to Comments SMP D1 EPA R1.doc](#)
[SMP Table 2-FY09 old T-3.doc](#)
[SMP Table 1-FY09 old T-2.doc](#)
Importance: High

RTC for EPA is acceptable. Watch your dates in Table 1 of SMP. For Site 3, the Site 3 LUC RD D1 has been handled via extension letter, so take out "22 November 2008". That date has become 6/11/09, so therefore Site 3 LUC RD D2 must be moved out further. I suggest at least August 2009. The Site 7 RI/FS D1 date has already expired. Perhaps you meant "17 May 2009". If that is the case, then again, the Site 7 and Site 14 dates are too close. However, if that is as far apart as you can contracutally move them, I suggest we accomplish one early so we do not have documents on top of each other. We all benefit from that.

I look forward to the revised SMP, which was due today?

Thanks,
Lila

"Sladic, Mark"
<Mark.Sladic@tet
ratech.com>
To
"Cook, Charles CIV NAVFAC SE"
<charles.cook2@navy.mil>, Lila
10/30/2008 08:47 AM
Koroma-Llamas/R4/USEPA/US@EPA,
"meredith amick"
<amickMS@dhec.sc.gov>
cc

Subject
MCRD Parris Island SMP RTC
letters

Good morning. Please see revised RTC letters based on discussions we've had after Charles provided the draft RTC letters. In addition, I've included Tables 1 and 2 for the SMP that show deliverable due dates. Note that in our discussion with EPA, Navy decided to remove the 'old' Table 1, so all the remaining tables get renumbered. The only outstanding issue appears to be how to address the MRP sites in the SMP (SCDHEC review comments). I think at present Lila is checking with

counsel to see whether the FFA needs to be revised before these sites would appear in the SMP.

If these new RTCs are acceptable, then Charles can provide a Navy cover letter for the formal RTC and revised SMP submittal and we'll go ahead and make that distribution. thanks.

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(See attached file: Response to Comments SMP D1 SCDHEC R1.doc)(See attached file: Response to Comments SMP D1 EPA R1.doc)(See attached file: SMP Table 2-FY09 old T-3.doc)(See attached file: SMP Table 1-FY09 old T-2.doc)

**ENGINEERING COMMENTS for
Draft MCRD FFA Site Management Plan Amendment FY09
Prepared by Meredith Amick
Marine Corps Recruit Depot (MCRD)
June 25, 2008**

Specific Comments

1. **Comment: Section 3 Page 10** - The Department understands that Naval Facilities Engineering Command, Southeast (NAVFAC, SE) is being relocated. Please clarify if NAVFAC, SE is located in Jacksonville, FL, and if not when the location will be moved.

Response: NAVFAC SE is in Jacksonville. The SMP was been revised accordingly.

2. **Comment: Section 4-Elliot's Beach OWS** - The Elliot's Beach OWS is listed to be addressed with both Sites 13C and Site 14. Please note that the Department has not concurred with the approach of addressing the Elliot's Beach OWS under an already existing Site, because a map has not been provided of the location of the Elliot's Beach OWS with respect to the location of either site. The Elliot's Beach OWS and Site 14 should be added to the existing site map for Parris Island. Additionally, the recommendation to address the Elliot's Beach OWS should only be listed under one of the already existing sites.

Response: NAVFAC council does not support identification of the Elliot's Beach OWS as an IR site fundable through ER,N. Therefore, based on the proximity to a stormwater discharge point, Navy has considered performing some sampling in the vicinity of this unit, or with Site 14. Based on the most recent expectations, linkage of the Eliot's Beach OWS to Site 13 does not appear likely, so the Eliots Beach information under Site 13 is being deleted. The Status language for Site 13 is being revised, as follows:

Investigation in progress. Funding expected for FY13 RI/FS, however revised SI/CS report will indicate that no further action may be appropriate.

For Site 14, the following language is being added to the end of the status section:
Sampling at the Eliot's Beach OWS may be dependent on funding participation from MCRD.

3. **Comment: Section 4-Site 35** - Please discuss if waste is continuing to be received from Marine Corp Air Station. Please discuss whether batteries are drained on Site 35, if the batteries received are not drained. Please note that the Department has not concurred with the path forward as listed in the status section. This topic should be discussed in on going team meetings.

Response: No waste from MCAS is being received. No batteries are being drained (all current batteries are sealed). The following sentence will be included in the Description section: Material is no longer received from MCAS. The following sentence will replace the current final two sentences: All batteries were required to be drained prior to DRMO receiving the material, and currently, only sealed batteries are accepted.

4. **Comment: Section 4-Site 45** - The Department understands that an RI Report is to be submitted for Site 45; however, this section states that the RI is complete. Please clarify.

Response: The Status section will be updated as follows:
RI complete, with RI Report conditionally approved pending completion of an RI Addendum to update the extent of plume migration due to the period of time that had elapsed since the original RI field effort. Addendum provided FY06 and is being finalized to incorporate vapor intrusion analysis.

Treatability Study(s) in progress. Treatability study results will support the FS, and the Team has reached consensus that the treatability data available to date is sufficient to start the FS. In addition, USGS and US EPA are collecting data at the site that better define the site conceptual model and therefore might support more refined remedy selection. The emulsified zero-valent iron injection treatability study group has received funding for long-term monitoring.

5. **Comment: Section 4-Site 53** - Please update the status for Site 53. Both EPA and DHEC have reviewed the EMAC report, which suggested more work needed to be done at the site. Please clarify where in the administrative process this site is.

Response: The Status section will be updated as shown: Investigation in progress. A trash removal followed by confirmation sampling was conducted in FY05. The follow-up report is not yet completed. Some trash still remains on site, ESVs were exceeded, and a path forward needs to be determined. Timing for funding for additional action uncertain based on low relative risk.

6. **Comment: Section 4-Site 54** - As written in Department comments to the FY 08 SMP:

The status section reads, "Timing for funding for additional investigation is uncertain based on low relative risk." However, as stated in risk assessment comments to the SAR for SWMU54, sent by the Department on October 2, 2007, "Due to the levels detected and the nature of the compounds found in the wetland, it is recommended that the Marine Corp Recruit Depot Team give this site a high priority for further investigation and evaluation." Please take this comment into consideration for future planning.

Response: The Navy's low relative risk determination does consider contaminants in the marsh and considers that there is currently no known impact to the ecosystem. The Navy's relative risk ranking generally is used to acquire funding for specific sites. However, Site 14, which has been funded, will include additional investigation of the marsh portion of Site 54. The Status entry will be updated as follows:

EPA collected samples in 2003 in order to support discussions about the path forward. The tank was removed in 2004 as a general maintenance activity under an EMAC contract, with a completion report submitted in March 2005. The closure sampling results have shifted the attention at this unit to the unit discharge line to the marsh.

A SWMU Assessment Report (SAR) was submitted in 2002 by MCRD. The site documentation is still being reviewed and the path forward has not yet been determined, although it is expected that additional marsh characterization will be completed during the investigation for Site 14, Storm Sewer Outfalls.

7. **Comment: Section 4** - Please include MMRP Sites.

Response: MMRP sites are being tracked currently by EPA and Navy. This tracking information will be provided to the State. We will update next year's SMP with these dates since many of them are in transition and RI s will not start for years. Initial discussion with SCDHEC indicated dissatisfaction with this approach, and the issue is not resolved. In addition, EPA is discussing the issue with regard to whether the MMRP sites need to first be incorporated into the FFA before the SMP.

8. **Comment: Table 4** - This table lists both Sites 53 and 54 as "Team reviewing confirmation sampling to determine path forward." EPA and DHEC have reviewed both the EMAC Report (for Site 53 and 54) and the SAR for Site 54. Please update the status.

Response: Table 4 will be updated as requested. Note that since original Table 1 has been deleted, Table 4 is now re-numbered as Table 3.

**Response to Comments
Draft FY09 Site Management Plan (SMP),
MCRD, Parris Island, South Carolina (June 2008)**

EPA Comments

Lila Llamas

1. **Comment:** **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.

Response: Dates in the SMP have been updated based on recent extension request letters, and previous SMPs.

2. **Comment:** **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...”.

Response: The change has been made as requested.

3. **Comment:** **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.

Response: A change has been made to language that does not need to be updated annually.

4. **Comment:** **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.

Response: Implementation of the UFP SAP program will likely have a significant impact on schedules. As schedule is a critical element of the SMP, we think the program is worth noting. We will leave the brief introductory paragraph, but delete the reference to the condensed guidance, and then delete the condensed guidance. In this case, all that will remain under section 4 is the following:

During FY08, the Navy issued guidance for use in preparation of all future Sampling and Analysis Plans. This SMP incorporates the guidance into scheduling the development and reviews of deliverables. The MCRD PI Tier 1 Environmental Team has not yet provided a submittal for third party review per the policy, so actual schedule impacts may vary significantly from expectations and will be refined in future SMPs.

5. **Comment:** **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.

Response: The text changes and due dates will be made as requested. We do not believe that footnoting the due dates is necessary.

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

Response: The status will be updated as follows:
Investigation in progress. SI/CS indicated minimal contamination and proposes an extended SI to sample the hummock area. Timing for funding for additional investigation, if necessary, uncertain based on low relative risk.

7. **Comment: 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.

Response: The language for Site 7 will be revised as follows:
Investigation in progress. SI/CS indicated minimal contamination, and suggests that following soil excavation the site could be suitable for clean closure. FY08 funding has been provided for this site, but at this time the path forward is uncertain.

Although some planning schedule changes have been made based on this comment, the uncertainty in the path forward for these sites should provide for additional spread-out of deliverables as requested by EPA. Although there have been discussions about what units might be included in investigations for these sites, Navy is unaware of a formal previously agreed strategy. Navy believes the strategy will be formalized as part of the planning process.

8. **Comment: 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.

Response: The final sentence for each status section will be updated as follows:
Since the original RI work plan was already approved and implemented, and since these sites are a high priority to the Navy and MCRD based on MILCON schedules, a milestone due date for the addendum work plan was not necessary.

The dates will be revised per EPA’s request. We do not believe that footnoting the due dates is necessary.

9. **Comment: 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.

Response: NAVFAC council does not support identification of the Elliot’s Beach OWS as an IR site fundable through ER,N. Therefore, based on the proximity to a stormwater discharge point, Navy has considered performing some sampling in the vicinity of this unit, or with Site 14. Based on the most recent expectations, linkage of the Eliot’s Beach OWS to Site 13 does not appear likely, so the Eliots

Beach information under Site 13 is being deleted. The Status language for Site 13 is being revised, as follows:

Investigation in progress. Funding expected for FY13 RI/FS, however revised SI/CS report will indicate that no further action may be appropriate.

For Site 14, the following language is being added to the end of the status section:
Sampling at the Eliot's Beach OWS may be dependent on funding participation from MCRD.

- 10. Comment: 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".

Response: The Status entry will be updated as follows:
RI Report conditionally approved pending completion of an RI Addendum to update the extent of plume migration due to the period of time that had elapsed since the original RI field effort and to address vapor intrusion. Treatability Study(s) in progress. Treatability study results may support the FS, and the Team has reached consensus that the treatability data available to date is sufficient to start the FS. In addition, USGS and US EPA are collecting data at the site that better define the site conceptual model and therefore might support more refined remedy selection. The emulsified zero-valent iron injection treatability study group has received funding for long-term monitoring.

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

Response: The change was made as requested.

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

Response: The Status entry will be updated as follows:
Investigation in progress. A trash removal followed by confirmation sampling was conducted in FY05. The follow-up report is not yet completed. Some trash still remains on site, ESVs were exceeded, and a path forward needs to be determined. Timing for funding for additional action uncertain based on low relative risk.

- 13. Comment: 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.

Response: The low relative risk determination does consider contaminants in the marsh and considers that there is currently no known impact to the ecosystem. The Status entry will be updated as follows:
EPA collected samples in 2003 in order to support discussions about the path forward. The tank was removed in 2004 as a general maintenance activity under an EMAC contract, with a completion report submitted in March 2005. The closure sampling results have shifted the attention at this unit to the unit discharge line to the marsh.

A SWMU Assessment Report (SAR) was submitted in 2002 by MCRD. The site documentation is still being reviewed and the path forward has not yet been determined, although it is expected that additional marsh characterization will be completed during the investigation for Site 14, Storm Sewer Outfalls.

14. **Comment: 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.

Response: NAVFAC council does not support identification of the Elliot's Beach OWS as an IR site fundable through ER,N. However, after further discussion with EPA, it was agreed to simply delete Table 1.

**TABLE 2
OUT-YEAR MILESTONES
SITE MANAGEMENT PLAN
MCRD PARRIS ISLAND**

	DRAFT FINAL (D2) DOCUMENT SUBMITTAL DATE⁽¹⁾	FY12	FY13	FY14 and Later
5	06 November 2011	Proposed Plan		
	05 July 2012	Record of Decision		
	13 March 2013		LUC RD	
	19 April 2013		LUC RACR Letter	
7	01 November 2011	Feasibility Study		
	12 January 2012	Proposed Plan		
	11 October 2012		Record of Decision	
	09 May 2013		LUC RD	
	25 June 2013		LUC RACR Letter	
13	04 November 2012		RI/FS Workplan	
	23 March 2014			RI Report
	11 December 2014			Feasibility Study
	6 August 2014			Proposed Plan
	27 July 2015			Record of Decision
	17 December 2016			LUC RD
	02 February 2017			LUC Letter
14	29 November 2011	Feasibility Study		
	19 July 2012		Proposed Plan	
	17 May 2013		Record of Decision	
	10 December 2013			LUC RD
	26 January 2014			LUC RACR Letter
27 (with 9/16/55)	15 April 2012	LUC RD		
	01 June 2012	LUC RACR Letter		
45 (with 32)	17 December 2011	LUC RD		
	02 February 2012	LUC RACR Letter		
	08 January 2013		Remedial Action Work Plan	
	08 January 2015			Construction Completion Report

NOTE: If the submittal date falls on a holiday or weekend, the submittal date will be the following business day.

**TABLE 1
NEAR TERM MILESTONES
SITE MANAGEMENT PLAN
MCRD PARRIS ISLAND**

	DRAFT DOCUMENT (D1) SUBMITTAL DATE	DRAFT FINAL (D2) DOCUMENT SUBMITTAL DATE	FY09	FY10	FY11
3	22 November 2008	05 May 2009	LUC RD		
		25 November 2009		LUC Letter	
5	02 February 2009	13 July 2009	RI/FS Work Plan		
	22 May 2010	30 October 2010			RI Report
	09 February 2011	20 July 2011			FS Report
7	17 May 2008	25 October 2009		RI/FS Work Plan	
	03 September 2010	11 February 2011			RI Report
14	14 June 2009	21 February 2010		RI/FS Work Plan	
	01 October 2010	11 March 2011			RI Report
27 (with 9/16/55)	28 February 2009	08 August 2009	RI Report		
	23 November 2009	03 April 2010		FS Report	
	14 July 2010	12 December 2010			Proposed Plan
	13 April 2011	21 September 2011			Record of Decision
45 (with 32)	11 December 2008	25 February 2009	VI Work Plan		
	27 October 2005	25 May 2009	RI Addendum		
	27 June 2009	05 December 2009		FS Report	
	15 February 2010	26 July 2010		Proposed Plan	
	14 December 2010	24 May 2011			Record of Decision

Note: If the submittal date falls on a holiday or weekend, the submittal will be due the following business day.