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EMAIL REGARDING U S EPA REGION IV COMMENTS ON OUTFALL ASSESSMENT AT SITE 14 STORM SEWER OUTFALLS MCRD PARRIS ISLAND SC
7/28/2009
U S EPA REGION IV

From: Llamas.Lila@epamail.epa.gov
To: Meredith Amick; Susan Byrd; Annie Gerry
Cc: Charles Cook; Heber Pittman; Sladic, Mark; Mac McRae; Pat Franklin; Churchill, Peggy; Timothy Harrington; Tom.Dillon@noaa.gov; Priscilla Wendt; Llamas.Lila@epamail.epa.gov
Subject: RE: MCRD Outfall Assessment
Date: Tuesday, July 28, 2009 3:35:13 PM

Dear DHEC Team,

I think you may be misreading what I wrote in both emails.

Let me address the question regarding Priscilla's feedback first. Foremost, all I said in response to Priscilla's email were some encouraging words to try and have her participate up-front with us in conversations as a trustee of natural resources. I had spoken with Priscilla before the July meeting, asking if she would be able to participate. However, she declined, due to schedules (just having come back from extensive leave) and workloads, but also stating that she is fine with responding to documents. I replied back to her feedback on the Outfall Assessments, to emphasize to her that her comments are valued up-front in decision-making rather than simply in response to something the team has generated. Her feedback went well beyond just the scoping document. So while I am sure Peggy would have said, "Let's hold that thought until we get there", I was pleased to see Priscilla offering her train of thought. If you recall, I have mentioned and tried to emphasize in emails before, on conference calls, and at the last meeting several times, the importance of having trustee participation up front. I was simply following through with what I believe to be an important issue.

Secondly, we are working towards team consensus, and that is the nature of the beast. There will be a variety of thoughts and opinions until we share a common position. In my reply back to Priscilla I said nothing with respect to agreement with her comments, because at the time I did not have time to read them in depth. If you notice, the time of my email regarding the DHEC Team comments and the previous exchanges between you and Mark, was 6:04 in the evening. My response to Priscilla's email was 6:10 in the evening. So I barely took time to glance through it once and write a response of encouraging words. I did not have time to assess whether or not I agreed with her and not with you. And I certainly do not tend to change my mind within 6 minutes of a 6 page email based on one other email. You all should know me better than that by now : -) My thoughts shared in the long email did not change based on one glance at her comments. However, since you do bring it up, and now that I have had a chance to read it once more, I believe EPA's thoughts are a little more in line with Priscilla's than SCDHEC's, in that Priscilla still recognized the role that sediment samples could play and does a good job of stating that there may be certain instances where sediment samples may be more appropriate and necessary than others, but we still differ on points in that it appears, I think but am not sure, that Priscilla is still recommending storm water samples everywhere, even in the low energy systems. EPA would still like more discussion on when it is necessary to take a storm water sample to meet our investigation goals, after the problem statement and CSM are in place. It is also very interesting that Priscilla also responded that she was perhaps not recommending the same thing as the DHEC team based on your previous emails and comments. Again, an indicator that more discussion is needed to reach consensus on these types of exchanges, and

in fact, to even tell who is agreeing with whom.....

With respect to my other email in response to DHEC comments and Meredith's and Mark's exchanges, I said EPA does not agree "in whole" with SCDHEC's comment #1, implying that I DID agree in part. But also that you had also raised many other legitimate questions that I look forward to Mark responding to. Furthermore, I got the same feedback from Dan as we got from Priscilla, regarding not recalling approval of the results or seeing anything in the files, contrary to your statement that EPA approved the research. He recalls a presentation made by Dr. Chow, but does not have a copy of the results. And he recalled a PAH-focused study, not an overall study and application of the findings. He did recall hits of metals in sediments near a dry dock, which would indicate that sediments may reflect ongoing contamination.

With respect to comment #1, perhaps I have misinterpreted your comment, but I am sure we will get to a point where we all understand each other and can reach consensus. The comment stated that "it was determined that sediment analysis would not be conclusive regarding overland run-off through storm drainage systems to the nearest water body from historical releases"meaning, to me and maybe only to me, that sediment samples alone can never indicate impact to the marsh from historic releases. EPA believes the Site 14 investigation is more complex than to be able to make such broad stroke assumptions. However, EPA went on to say "So while I agree sediment samples at the outfall may not be the end all to contamination indicators, I think they could be significant and appropriate for an SI level investigation depending on what COCs we are talking about and when the COCs were deposited there."

Furthermore, in comment #1, DHEC states "Therefore, the Department recommends (similar to the approach at the Naval Complex) that surface water samples be collected from within the outfall pipe during a period of heavy rainfall. If an outfall is tidally influenced, samples should be collected during the outgoing tide." EPA's response was "...the idea of sampling the surface water in the outfall for a continuing source indicator may also be appropriate at the SI stage, to indicate what is in the storm water, and perhaps answer the question of whether or not we would expect to see deposits near the outfall or more removed via transportation. However, I would argue that the timing of the pipe water samples is dependent upon what you may be looking to see." EPA also indicated the need for confirmation from the Base as to what permits and permit requirements are in place for which outfalls. The storm water sampling may already be covered under another program. EPA went on to provide feedback from the trustees as had been provided up to that point (thus my response to Priscilla's email, happy that she was participating in real time on the subject.) What we had discussed at the meeting was to take sediment samples to determine if contaminants are present, and then upstream water samples (and whatever other investigation is necessary) once the sediments indicated a potential problem. So obviously we need to discuss this further and decide if water samples already exist under another program, or if they need to be taken up-front, or in response to hits, or during certain scenarios up-front and other scenarios in response to a hit, and at what time for each scenario. But still, all this comes after the problem statement and CSM.

Furthermore, Mark's statements in his email reply to DHEC's preliminary email reflect a slightly different slant to what he thought he heard Susan say, including "...not necessarily going to be adequate correlation between any sediment detections and what might/might not

have been released up-pipe,..." as opposed to the comment which reads " it was determined that sediment analysis would not be conclusive...". Mark's email also states regarding his conversation with Susan that they discussed that "Once in acceptance of the CNC data, the study concludes that the only meaningful data collection would be that resulting from the storm water discharge" implying that sediment samples are not necessary at all, again, making it apparent we need further discussion.

And lastly, in Mark's reply he says "...the actual goal for Parris, based on the IAS/RFI, would be to identify non-continuing, historic releases" which I felt fell short of capturing the goal of the investigation, considering we have examples of continuing historic releases of concern as well (site 45), indicating we need to capture our problem statement and CSM in writing and get buy-in to it, before going too far with sampling design. Therefore, EPA offered some thoughts on the Problem Statement, which tried to incorporate sediment, gw, and sw samples, and ended that section with some thought provoking questions and an invite for further discussion. EPA went on to offer thoughts on the CSM, and different scenarios which could be at play in this Site investigation, indicating why EPA thinks we need to be cautious about making broad stroking statements about what we need to do, before we have even worked thru the PS, CSM and DQO process. None of that has changed for me.

So here I am, 3 pages further, and still in agreement or disagreement with whomever I agreed or disagreed with previously, I think, but am not sure.

Thanks,
Lila

"Meredith Amick" <AmickMS@dhec.sc.gov>
07/28/2009 10:07 AM

To
"Priscilla Wendt" <WendtP@dnr.sc.gov>, Lila Llamas/R4/USEPA/US@EPA

cc
"Susan Byrd" <BYRDSK@dhec.sc.gov>, "Annie Gerry" <GerryAM@dhec.sc.gov>, "Pat Franklin" <pat.franklin@mail.com>, "Charles Cook" <charles.cook2@navy.mil>, <Tom.Dillon@noaa.gov>, "Mac McRae" <mmcrae@TechLawInc.com>, "Mark Sladic" <Mark.Sladic@tetratech.com>, "Peggy Churchill" <Peggy.Churchill@tetratech.com>, "Heber Pittman" <darrel.pittman@usmc.mil>, "Timothy Harrington" <timothy.j.harrington@usmc.mil>

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