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MCRD PARRIS ISLAND
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U S NAVY RESPONSES TO U S EPA REGION IV AND SOUTH CAROLINA DEPARTMENT
OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON DRAFT SITE
MANAGEMENT PLAN FOR FISCAL YEAR 2011 MCRD PARRIS ISLAND SC
6/1/2010
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST

**Response to Comments
Draft FY11 Site Management Plan (SMP),
MCRD, Parris Island, South Carolina (June 2010)**

EPA Comments

Lila Llamas

GENERAL COMMENTS:

- 1) **Tables and DUE DATES in text throughout document** – A majority of dates in Tables 1 and 2 are not acceptable. It appears there were significant typos due to inaccurate cut and past from columns and rows. EPA does not consider this D1 as an actual request for extension dates, but rather as typos as they appear, therefore, if the Navy actually intended these as requests for extensions or changes to the SMP, they should notify EPA immediately. EPA does not approve any extensions or changes to Near-Term Milestones in this SMP Update D1. Attached to this letter (and to a corresponding email) is a redline version of Tables 1 and 2 based on approved Extended Deadlines (which cannot be extended via an SMP change), as well as suggested revised SMP D1 and D2 projected dates for certain other primary documents. Please modify Tables 1 and 2 as indicated in the redline files then record the corrected information back in the text of the document as appropriate. Check to make sure dates in the text match dates in the Tables, which should also match previously approved extension dates as applicable.

RESPONSE

Existing milestones will remain the same. As noted the additional milestones will be proposed for previously non established site tasks.

- 2) **Planned Non-Time Critical Removal Action (NTCRA), associated secondary documents, and corresponding target dates** – EPA understands the Navy is anticipating taking a NTCRA at Site(s) 55 and/or 27, and/or 9, and/or 16. NTCRAs should be identified and target dates established for associated secondary documents. Please clarify if NTCRA's are planned, and if so, specifically identify them in this SMP Update. Additionally, even though documents supporting the removals would not be considered primary documents, they are considered secondary documents according to Federal Facilities Agreement (FFA) Section VIII, paragraphs 8.4(a)(2), 8.4(a)(5), and 8.4(a)(9) and should have target submittal dates identified in the SMP, as required by FFA Section XII, Paragraph 12.4(c). For the definition of "Target Dates", please see FFA Section II, Paragraph 2.1(gg). Identification of these target dates would allow for proper review of Milestone dates for corresponding primary documents and would assist in work scheduling. (See Specific Comments for details of changes needed in this SMP Update.)

RESPONSE

The ECCA completion date has been proposed. Field work dates have also been established.

- 3) **Reminder regarding previously approved milestone extensions** – EPA appreciates the Navy abiding by the previously approved extensions to milestones. Simply as a reminder, Deadlines and Near Term Milestones previously approved via an extension request letter are not to be extended via an SMP Update, but rather via a new Extension Request letter. In your revision to this SMP D1, please ensure you continue to maintain the approved extension dates in your D2 submittal. Also, within the text of the document, if the dates fall within FY11 they should be included at the end of each Site Description and FY11 Document Deliverables Section. Adhering to these requirements will help to ensure the D2 SMP is approvable.

RESPONSE

Agreed. Existing dates will be adhered to.

- 4) **Table 2** – As you will see in the redline file for Table 2, the years in the columns have been corrected to reflect Out Year Milestones as FY+3, FY+4, and FY+5. This resolves the duplicated milestones for FY13, but left the new column “FY16 and Later” blank. Suggestions have been added for this column. Please give additional thought to the Out-Year Milestones based on the projected Near-Term Milestones for Sites currently under investigation, and add any Sites activities which you project will be initiated during those out-years, in order to reflect what the Navy is actually anticipating. Update Table 2 accordingly, after making the changes in the redline files.

RESPONSE

Out year milestones can be made when the site task has been funded.

- 5) **COVER PAGE** – Simply as a reminder, please ensure the D2 submittal accurately reflects the version and date we are working on. The revised document should be dated whenever you complete your revision and would read “DRAFT FINAL (D2)”. This also applies to the Headers on each page of the document. The dates in the Footers on Tables 1, 2, and 3 also need to be updated with each revision.

RESPONSE

Comment noted

SPECIFIC COMMENTS:

- 6) **Section 2, Annual Updating of the SMP, Page 7** – Paragraph b of the Navy’s response states “No critical or non-time critical removal actions (NTCRA) are planned.” This is not EPA’s understanding of the Navy’s plans. Please clarify if NTCRA’s are planned, and if so, specifically identify them in this paragraph. (See General Comment #2)

RESPONSE

An ECCA and approved removal action is planned for completion within the next 19 months.

- 7) **Section 5, Site Descriptions and FY11 Document Deliverables** – Even though documents supporting removals would not be considered primary documents, they are considered secondary documents and target dates should be included in this Section if they fall in FY11. Please modify the SMP Update to identify secondary documents with current FY Target Dates for each site, in addition to the Primary Deliverables already identified. (See General Comment #2)

RESPONSE

At a minimum the ECCA will be submitted in FY 2011.

- 8) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 4** – Please correct the text. The SI/CS Draft Final now recommends No Action/No Further Action. Please resolve this with the SMP text regarding recommendations as well as funding.

Agreed, The funding for site 4 and site 13c are located adjacent to each other and projected funding will cover the either site (if either is needed to be further investigated) This will be reflected in the SMP.

- 9) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 5** – The RI/FS Workplan D2 is due 30 November, 2010 in accordance with approved extension dates. Please add this primary document submittal to this section and ensure it is correct in the Tables. The RI Report D1 currently identified in this Section has a date that is inconsistent with the date listed in the Tables. Please ensure the correct date is included in the Table. Regardless of which date is correct, either date falls in FY12 and should not be included in this Section of the text. If the date should be changed to be a date within this FY, then correct the date in the text and table and leave the item in this section of text.

RESPONSE

Agreed. It is recognized that, although the RI/FS has been agreed upon to be submitted together; the RI D-2 will need to be an approvable document. The date is correct.

- 10) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 9/16/27/55** – For these sites, identify if a removal action is planned or not. Indicate so in this section text for each site if there is to be a removal, and include target dates for secondary removal documents if they fall within FY11 (otherwise if they fall outside FY11, include them in the appropriate table.) (See General Comment #2.)

RESPONSE

The only secondary removal documents that are forecast for FY 2011 are the ECCA and work plan. The Post remedial action report shall also be forecast conservatively in FY 2012.

- 11) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 14** – The text indicates sampling to support the Site 14 RI will include a former OWS location near a storm Sewer Outfall on Elliot’s Beach. The text goes on to state a “work plan” is in progress, but does not specify SI or RI work plan. Please clarify. EPA understands the work plan is for an SI investigation. However, if the site is in the SI stage, it cannot be known if the Site will need an RI investigation or not. Please explain what is to happen with the subject OWS if Site 14 does not require an RI. (Note: The agreement was that if contamination is found at Site 14 outfalls and can be linked to a known process site, that contamination will be addressed with the known process site, rather than Site 14, therefore, it may be plausible that Site 14 will not need an RI.)

RESPONSE :

The work plan is a SI work plan. If the site 14 does not go to an RI then the UST program will address needed sampling remediation. Since in the near future UST funding will be coming out of the ERN account Any needed future investigation or remedial activity can be handled through the UST /ERN program.

- 12) **Section 5, Site Descriptions and FY11 Document Deliverables, SWMU 21** – EPA has requested the projected project completion date for the OWS removal under the UST program several times. The Navy should either provide the UST schedule within this text in Section 5 and/or include a milestone date for completing the RI for SWMU 21 OWS in the text/tables.

RESPONSE :

AST/UST Contract will be modified to include this task with 2011 funding.

- 13) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 27** – The text herein under the Status paragraph mentions a “Remedial Action Contract” which has been issued for this site. Please clarify in the text if this is for a removal or a remedial action. (Also see Sites 9/16/27/55 comment above regarding target dates for the removal documents.)

RESPONSE:

The removal action is an Non Time Critical Removal Action. A minimum of six months is required from initiation to field activity. This removal action is not addressing an eminent threat; rather, it is addressing the mobility of contaminates by removing much of the source (which is producing a potential threat).

- 14) **Table 3 and Section 5, Site Descriptions and FY11 Document Deliverables, Site 45** – In the Primary Deliverables table in this section, please identify the RI Addendum scheduled for 30 December, 2010 as the D2 version (and in Table 1 also.)

Agreed. It is recognized that the RI/FS is going to be provided together as a submittal. However the D-1 RI/FS must already contain an approve RI.

- 15) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 53** – Since ESVs were exceeded and contaminant sources were only removed in part, this triggers the need for a Remedial Investigation (RI) under CERCLA for this site. Please update the text accordingly.

RESPONSE

The risk has been evaluated informally. Although ESVs were exceeded, it does not appear to have adequate pathways to either human or eco logical receptors. Removal of debris on site appears to be the final action required. A more formal evaluation of the risk will be prepared.

- 16) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 55** – The text herein under the Status paragraph mentions a “Remedial Action Contract” which has been issued for this site. Please clarify in the text if this is for a removal or a remedial action. (Also see Sites 9/16/27/55 comment above regarding target dates for the removal documents.)

RESPONSE

The action proposed is a non time critical removal action (NTCRA). Subsequent remedial actions may or may not be required.

- 17) **Table 1 and Section 5, Site Descriptions and FY11 Document Deliverables, Site 9/16/27/55** – For these sites, the RI Report D1 and D2 Deadlines were extended via an extension request letter and therefore may not be extended via an SMP Update. Please ensure the deadlines and/or milestones for these document submittals do not change from those approved in EPA’s approval letter for the corresponding extension request. EPA assumes typos in Table 1. Therefore, no deadline for FY11 needs to be in the Section 5 text for these sites. However, the milestone dates in Table 1 should be corrected.

RESPONSE

Agreed

- 18) **Table 3 and Section 5, Site Descriptions and FY11 Document Deliverables, MRS/MMRP Sites** – In accordance with EPA’s OSWER Directive 9200.3-60, Military Response Sites (MRS)/Military Munitions Response Program (MMRP) Sites which are within the boundary of an NPL Site, should be added to the FFA as soon as practicable, together with an enforceable schedule of milestones, including primary and secondary documents. Please add all such sites known to the Navy/MCRD to Table 3, Annual Update For FFA Appendix C Sites, and describe each site in Section 5 of the SMP Update. This should include at least those 8 inactive and closed MRS Sites for which a Site Investigation (SI) was recently conducted at MCRD, as well as those listed in the MMRP as inactive and closed under the MMRP Preliminary Assessment (PA) document. Additionally, if there are any MRS Sites on MCRD which are inactive and closed but for which a PA has not yet been conducted (needs PA), these should be added to Table 3 as well. Please update Table 3 accordingly and include Site Descriptions for each Site in Section 5. Milestones and target dates should coincide with the prioritization schedule generated by the Munitions Response Site Prioritization Protocol (MRSPP) if available.

RESPONSE

The MRP sites have been added to the text and the tables.

- 19) **Table 1**– There appears to be multiple typos in Table 1 due to cut and paste errors associated with columns and rows. Please correct these in accordance with the attached redline provided by EPA. If the Navy/MCRD does not agree with the suggested changes, the Navy should contact EPA and negotiate alternative dates to ensure approval of your D2 submittal. EPA does not approve any extensions to near-term milestones which may have been inferred based on these typos. If any extensions are being requested, the Navy should contact EPA regarding these prior to the D2 submittal. See General Comment 1 above, as well as any other comment which may impact Table 1 dates.

RESPONSE

Legal counsel and staff have reviewed for potential compliance problems.

- 20) **Table 2** – Please correct Table 2 in accordance with the attached redline provided by EPA. If Navy/MCRD does not agree with the suggested changes, the Navy should contact EPA and negotiate alternative dates to ensure approval of your D2 submittal. See General Comment 4 above, as well as any other comment which may impact Table 2 dates.

RESPONSE

Agreed

- 21) **Table 1 and 2 or New Tables** – Target Dates for secondary documents should be included in a Table as well. They could be added to the “Table 1” as a Near-Term Target Date if you modify the Table 1 title to allow for Near-Term Target dates also. It is suggested to create a separate additional table below the Milestones based on Extensions to clearly separate primary deadlines from secondary targets. The same could be done for secondary target dates in the Out-Years for Table 2. Otherwise, new tables for secondary target dates Near-term and out-year need to be added. (See General Comment #2.)

RESPONSE

New tables are added

DEHC Comment

1. The Department reiterates the following comments from their June 2009 comment letter to the 2009 SMP:

a. The Department believes that any comments issued to documents related to Site 35 have been clarified; however, the team has not agreed on a path forward for Site 35.

RESPONSE

Agree : The following was added to the text “ The team needs to determine a path forward for this site”

DEHC Comment

b. It is the Department's understanding (from a 12/5/07 email Pittman to Amick) that SWMU 36 is no longer a hazardous waste storage area and therefore is no longer receiving waste from SWMU 21. Please clarify.

RESPONSE

The text was added in last SMP “Material is no longer received from MCAS” This statement will be changed to the following: ‘ Potential Hazardous Wastes are no longer received from either MCAS or SWMU 21’.

DEHC Comment

c. The Department believes that the to be demolished building discussed in the Site 45 Section has already been demolished. Please clarify.

RESPONSE

The demolition of the building has occurred to 90% completion . The slab is all that remains. The text will be changed to include the following : “ The former BOQ Quarters adjacent to the site has been demolished down to the slab and is no longer a human health pathway.”

DEHC Comment

2. Please ensure that the Sites 27,55,9 and 16 discussions are accurate and provide the same information. (i.e. The Site 27 SAP is separate from the Site 55/9/16 SAP , etc)

RESPONSE

The Status Section of each site provides the same information. The following sentence will be added to each section: “Site 27 SAP and Sites 55/9/16 SAP were prepared separately and submitted for regulatory review. Field work at sites 27, 55, 9,16 was conducted before formal review by the regulators. On location regulatory oversight was conducted by both DHEC and EPA. “

DEHC Comment

3. In Table 3 please explain why the status of Sites 27, 55, 9 and 16 do not correlate.

Response: Site 8 was changed to Site 9 , The sites have identical status statements.

DEHC Comment

4. In the text for Site 45 it is stated that the RI Addendum and FS Report will be submitted together before FYI O. However, the due dates for these documents are listed as different dates in FYIO. Please explain.

Response : A statement will be added explaining as follows : “Although the RI addendum will be submitted with the FS. the submittal of the two will be tracked separately. It is necessary to have a completed/approvable RI addendum by December 30, 2010 ”

DEHC Comment

5. In Table 3 several sites are listed as being investigated with Site 14; however, recent Partnering Team Meeting discussions seem to indicate that Site 14 will be investigated separately. Please correct the discrepancy.

RESPONSE

Based on results from the sediment /storm water sampling each identified process area will be investigated. These identified process areas are in the water shed basin of the storm water system. This is consistent with the data quality objectives developed.