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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV RESPONSE TO U S NAVY REQUEST FOR
CHANGE IN NEAR TERM MILESTONE DATE FOR REMEDIAL INVESTIGATION WORK
PLAN FOR SITE 5 MCRD PARRIS ISLAND SC
11/22/2010
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

November 22, 2010

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

SUBJ: REQUEST FOR CHANGE IN NEAR TERM MILSTONE DATE FOR SITE 5 RI WORKPLAN
AT MCRD, PARRIS ISLAND, SC (Cook Letter, November 12, 2010)

Dear Mr. Cook:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced letter requesting an extension to a deadline pursuant to the Federal Facilities Agreement (FFA). The Navy's request for extension fails to comply with Section XI, Paragraph 11.1, subparts b and d. The Navy should have included in their extension request, the length of the extension sought and any related deadline and/or schedule that would be affected if the extension were granted. However, EPA participated in the Tier I Team meeting on November 16 through 17 and understands the following dates pertaining to Site 5 were agreed to by all parties:

- Comments on the Draft (D1) Site 5 RI Work Plan are due to the Navy by February 28, 2011.
- The RTCs from the Navy and subsequent revision scoping would be due in accordance with the negotiated review/response timeframes in the SMP.
- The Draft Final (D2) Site 5 RI Work Plan new deadline is July 30th, 2011.
- Other subsequent Site 5 document submittal dates will be adjusted in the Site Management Plan (SMP), specifically in Table 1, FY12/13 columns accordingly, as well as those in Table 2. Please ensure that all dates within the SMP (text as well as Tables) are updated consistently.

If the Navy agrees to these dates and properly reflects them in a revised SMP document within 14 days of receipt of this approval, the Navy may consider this extension request approved. Otherwise, this extension request is denied based on the Navy's failure to meet the requirements of FFA Section XI, Paragraph 11.1, subparts b and d.

While EPA has considered this extension request although the request is deficient, the Navy should ensure that any future extension requests meet all requirements of the FFA. Furthermore, EPA expects the Navy to consider priorities in setting milestone dates, and should minimize the request for regulatory agencies to adjust review times/schedules due to shifting Navy priorities. Submittal of the Draft Final document by the adjusted deadline milestone date is enforceable as specified by the FFA.

This deadline can only be extended again based on an extension request, not by submittal of a revised SMP document.

EPA looks forward to submittal of this and other documents by the dates specified in the SMP as progress is made towards the Team's remediation goals. If there is any way EPA can assist in helping you to meet or exceed SMP deadlines, please do not hesitate to call me at (404) 562-9969.

Sincerely,

A handwritten signature in black ink that reads "Lila Llamas". The signature is written in a cursive, flowing style.

Lila Llamas
Senior RPM
Federal Facilities Branch
Superfund Division

cc: Lisa Donohoe, MCRD
Meredith Amick, SCDHEC
Mark Sladic, TtNus