

M00263.AR.000368
MCRD PARRIS ISLAND
5090.3a

LETTER REGARDING UNAUTHORIZED ACTIVITY AT SITE 3 CAUSEWAY LANDFILL AND
IMPROVEMENTS TO LAND USE CONTROLS MCRD PARRIS ISLAND SC
7/18/2005
MCRD PARRIS ISLAND



UNITED STATES MARINE CORPS

MARINE CORPS RECRUIT DEPOT/EASTERN RECRUITING REGION
P.O. BOX 19001
PARRIS ISLAND, SOUTH CAROLINA 29905-9001

5090
NREAO
July 18, 2005

Ms. Lila Koroma-Llamas
Remedial Project Manager
Federal Facilities Branch
Waste Management Division
U.S. Environmental Protection Agency
Atlanta Federal Center
Atlanta, GA 30303-8960

RE: Site/SWMU 3 Causeway Landfill Land Use Controls

Dear Ms. Koroma-Llamas,

Recently, we have had two incidences of unauthorized activities occurring at Site/SWMU 3 Causeway Landfill. Of obvious concern is the viability of the institutional or land use controls that function to protect the landfill cover. It is clear to MCRD Parris Island that we must buttress our internal procedures in order to make the land use controls effective and consequently ensure the effectiveness of the remedy.

We will place signs along the causeway to more clearly identify the site restrictions: "No digging. Contact the Environmental Office at ext. 3423." The signs will be mounted on the utility poles, facing in both directions.

Further we are continuing to develop our Geographic Information System (GIS). Currently, the GIS is only visible to those personnel that have the Arcview software loaded on their desktop computers. Effectively, that limits its visibility to a limited number of people within our Facilities and Environmental Divisions. One planned upgrade to our GIS system is to provide Depot-wide access via the web browser. Any advancement to our GIS is encumbered by issues related to the Navy Marine Corps Intranet (NMCI) which controls all of the hardware and software used throughout the Department of the Navy.

I have directed the Environmental Division to develop a Depot Order specific to land use controls. The underlying idea is to create a document that identifies all of the environmental land use restrictions throughout the Depot. Further, the Order would reference any supporting agreements among the Depot, the U. S. EPA, the SCDHEC, the SC SHPO, federally recognized Tribes and

other stakeholders. The Order will be provided in its draft form by September 6, 2005.

Another valuable tool for ensuring that land use controls are properly presented is the Installation Restoration Collaboration Gateway. Naval Facilities Engineering Command and Tetra Tech have developed the Gateway. The Gateway allows all team members to view the IR-specific GIS data to ensure that it adequately reflects the program's status. The website allows team members to share documents, view GIS data, and there is a Land Use Control Section that is under development.

Additionally, we will enhance our environmental education program. Currently, we provide general environmental awareness training to the entire Depot population as they join the Command. Our plan is to make that awareness training an annual requirement. Additionally, managers of sections with the potential to significantly impact the environment, receive National Environmental Policy Act (NEPA) training. The NEPA training serves to underscore the need for proper planning and consideration of the environmental consequences of our actions:

Currently, our environmental management system (EMS) is under development. The EMS will provide another layer of visibility and reinforcement for the land use controls. More significantly, the EMS provides a system of auditing and management review. The audits will ensure that written procedures are both adequate and being complied with. The EMS will also serve as a document repository so that applicable directives are easily found and routinely updated.

MCRD Parris Island will continue to develop a layered set of internal controls in order to eliminate any future compromise of the land use controls. We are creating a system of education, policy and directives, planning processes, auditing and review to ensure that land use controls are effective.

Should you have questions, please contact Mr. Tim Harrington at (843) 228-3423.

J. R. WINGARD
Colonel, USMC
By direction of the
Commanding General