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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT SITE MANAGEMENT PLAN FOR FISCAL YEAR 2007 MCRD PARRIS ISLAND SC
7/13/2006
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

July 13, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Commander, Southern Division
Naval Facilities Engineering Command Southeast
OPCEVR (IPT-Central)
Attn: Mr. Arthur F. Sanford
Remedial Project Manager, MCRD Parris Island
2155 Eagle Drive
North Charleston, S.C. 29406

And

Commanding General
Marine Corps Recruit Depot
Attn: Timothy J. Harrington, NREAO
P.O. Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the Draft (D1) Marine Corps Recruit Depot Parris Island Federal Facilities Agreement Site Management Plan Amendment Fiscal Year 07. (SMP)

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document. EPA appreciates all the hard work and effort it took to get such a good first draft in on time. EPA offers the following comments for your consideration.

Comments on Draft SMP Dated June 15, 2006:

1. Overall, this SMP is a very good effort on behalf of the Navy and will make next year's update much easier. Thanks for the hard work.

2. To the acronym list add the following:

LTM Long-Term Monitoring
CCR/RACR Construction Completion or Remedial Action Completion Report

3. Bold and underline the Section 2 Title line.

4. Section 2 bullet c. Place a dash in front of the line beginning "Schedule for..."

5. Section 2, 2nd bullet b. Please delete the following sentence: "The Operable Unit designation is not currently utilized at MCRD." As the Team has been reminded periodically by this RPM and previous RPMs, even though the Team does not use OU language and references on a routine basis, EPA is tracking work with the CERCLIS database by OUs as agreed to by the team in years past. Please insert the following into the text of the SMP and make associated changes to the Section 4 Site Description information and organize it accordingly.

   "The current record of OUs and associated sites is as follows:

   OU1 = Sites 1 and 41
   OU2 = Sites 2 and 15
   OU3 = Site 3
   OU4 = Site 45 (should include new proposed site. and also 32?)
   OU5 = Site 12
   OU6 = Site 21 (No Action ROD projected or redesignated PA/SI)
   OU7 = Sites 7, 9, and 16 (Soils Remediation ROD projected)
   OU8 = Site 5 (No Action ROD projected)
   OU9 = Sites 27, 55, 35 (Soils Remediation ROD projected. & gw too?)"

   Sites and site work were organized into these OUs based on factors such as media, geographic location, risk, potential remediation approach, funding availability, etc. EPA believes the groupings previously agreed to by the team some years ago may now be outdated. For those OUs for which an RI/FS has not yet been started (OUs 7, 8, and 9), or for new OUs as necessary, the NAVY should take this opportunity to propose a regrouping of Sites into OUs. Please include those Sites identified in the SMP as needing an RI/FS in the near future (5, 9, 13c, 14, 16, 27, and 55) as well as all other newly proposed Sites (see OU4 above) for which an RI/FS is anticipated to be needed. Then group the remaining Sites in accordance with which you anticipate pursuing funding for the preliminary investigations needed (PA, SI and/or Extended SI) as indicated in the SMP Section 4 text (Sites 4, 7, 8, 35, 39, 46, 47, 48, 49, 50, 52, 53, and 54). With each proposed grouping, please include a brief description of the reasoning used (see factors considered above) and the relative ranking based on the Navy's priority ranking equation. Please feel free to call EPA & DHEC to discuss these groupings and their potential impact before submitting an RTC for these comments (for instance, the impact of including 9/16/27/55 in an RI that cannot be completed in a timely manner due to insufficient funds; how to group Site 45 and the new proposed site, etc.)

6. Insert a return before Section 3.

7. Section 4. Please begin this section with a brief paragraph that identifies those sites already eliminated from concern by the conclusion of a PA and/or SI phase.

8. Section 4. Review and approval of this Section and Table 1 requires intimate knowledge of previous agreements made by the Team prior to this RPMs tenure with the Team. The Site Descriptions and Table 1 are a very useful references, if accurate. However, for clarification, please add the following language to the text at the beginning of Section 4 and just above Table 1, "The following is for informational purposes only."

9. Section 4. Please begin this section with a brief paragraph that identifies those sites eliminated from concern at the conclusion of the PA and/or SI phase.

10. Site 1. Status – Add to the status that the Draft Long Term Monitoring Plan (LTM) and Draft Construction Completion Report (CCR) have been submitted previously, but will need revision before a Draft Final Document can be submitted for approval (the LTM being a secondary document in support of the primary CCR.) Also add that a Land Use Control Remedial Design (LUC RD) will be submitted within 90 days of the finalization of the ROD. Then add these documents/updates to the FY07 Deliverables and Tables 1 – 4 as appropriate.

11. Site 3. Status – EPA believes the Final ROD will include land use controls and long-term monitoring by reference to the Interim ROD. However, a LUC RD will be needed based on resolution of the Post ROD Authority Dispute Resolution. Please mention this here and include it in the FY07 Deliverables and Tables 1 – 4 as appropriate. This then begs the question, if we create a LUC RD, do we then, by necessity, need a CCR, even if it is a very short document that clarifies implementation of the LUCs and LTM, in order to close the action? EPA is open to ideas from the Navy and SCDHEC as to this potential requirement.

12. Site 4. Status – Please identify the additional investigation needed as an extended SI.

13. Site 5. Status – Please identify the additional investigation as an RI/FS.

14. Site 7. Status – Please identify the additional investigation as an extended SI.

15. Site 8. Status – Please identify the investigation as a PA, or whatever is appropriate.

16. Site 9, 16, 27, 55. Status – Please identify the funded investigation as an RI/FS.

17. Site 12. Status – Assuming the Site 12 ROD will require LUCs, state that a Land Use Control Remedial Design (LUC RD) will be submitted within 90 days of the finalization of the ROD. Then add this document to the FY07 Deliverables and Tables 1 – 4 as appropriate. The LUC RD should be submitted prior to the Construction Completion Report, so that LUC information can be addressed within the CCR, and accordingly, that submittal date will need to be moved out.

18. Sites 13a and 13b. Concern – After "None identified…", please add the clarifier "… as a result of the _____." Fill in the blank with PA, SI, Extended SI, SAR, etc. as appropriate.

19. Site 13c. Status – Please identify the funded investigation as an RI/FS.

20. Site 14. Status – Please identify the funded investigation as an RI/FS.

21. Site 32. Status – Please verify and clarify if SWMU 32 is being addressed fully within the current Site 45 GW documents, or if it was eliminated as a concern during some previous document, perhaps at the time it was demolished.

22. Site 35. Please identify the investigation by name (maintenance action?) and indicate that at least a PA will be needed for CERCLA.

23. Site 39. Please identify the additional investigation requiring funding (PA?).

24. Site 53. Status – Please identify the investigation by name (maintenance action?) and indicate that at least a PA will be needed for CERCLA.

25. Site 54. Status – Please identify under what type of action the tank was removed. Please identify that a SAR was completed, and identify the additional investigation needed by name.

26. Table 1. In addition to the changes required by comments above, the following changes are suggested:

    a. For ease of clarification, add a column for LUC RD, since this may often be a separate document from the Remedial Design, due to requirement to submit within 90 days of ROD finalization, timing of remedial design, results of remedial actions, etc.
    b. Delete Site rows for which it has not yet been determined that an RI/FS will be needed. Add spacing to remaining rows for ease of reading.
    c. Explain and/or correct CCR information for Site 1 and 41. Is this a proposal for submission of the D1 revision? Or a D2 submission? Either way, it should be moved out to become an early FY07 Deadline. (see comment above)
    d. For ease of clarification, add another row for Site 3, labeling one "3Interim" and the other "3Final", then enter the information accordingly. Be sure to include a LUC RD for the 3Final line, and perhaps a CCR.
    e. For 9, 16, 27, and 55, project a LUC RD if anticipated.
    f. For Site 45, project a LUC RD if anticipated.
    g. For any other sites, include a LUC RD as anticipated.
    h. Footnote 1. After "These documents were…" add "submitted and/or".

27. Table 2. Add a row for Site 1 and include milestones as requested above.

28. Table 2. Remember to move out the date for Draft CCR submittal, to allow for incorporation of LUC information.

29. Table 2. If Sites 13c and 14 are not related and are not being addressed in the same RI/FS, please vary the submittal dates so that they are not submitted within at least two weeks of each other.

30. Table 2. Please verify that Site 32 is actually being addressed as part of the current Site 45 documents, rather than having been eliminated in a previous document at the time of demolition.

31. Table 2 (and the Document Milestone Schedule). The Primary Document Milestones, especially FY07 Deadlines, need to be scrutinized since the time between a Draft and Draft Final submittal is too tight for some documents considering what the FFA allows. Based on EPA needs, EPA requests the following:

    a. The FFA states that the document review timeframes can be established in the SMP. EPA's contractor is generally allowed 30 days for document review according to the Branch-wide contract. In order to allow review and incorporation of contractor comments together with program and legal comments, EPA is hereby requesting 45 days for review of Draft Primary Documents. This should minimize the need to request 20 day extensions.
    b. EPA believes this is the Team's opportunity to manage our work load and establish due dates that allow us to maintain current practices, if that is desired (e.g. the practice of waiting for RTC feedback before issuing a redline/strikeout version, and sending that prior to getting Draft Final signatures.) In order to do this, EPA is requesting the Navy review all Draft Final Document Submittal Dates and ensure they are set at least 120 days out from the Draft Document Submittal Date (allowing for 30 + 15 extra days (see a above) for commenting, and 30 + 30 + 15 extra days for RTC Feedback/redline sharing), thus minimizing the Navy's need to request extensions. This doesn't mean that EPA/DHEC will always take 45 days, nor that the Navy will always take 75 days, but it means the days are there to manage and use as the team needs.
    c. Once the Draft Final Document Submittal Dates have been changed as requested above, review and ensure that NO submittal dates fall on Holidays, weekends, or in the middle of usual Holiday weeks.

32. Table 2. A duplicate page of Table 2 appears to be included in this version of the SMP. Please delete it.

33. Table 3. Please include LUC RDs as anticipated.

34. Table 3. Note & TBDs – EPA requests the Navy enter a reasonable date for each, considering the OU groupings discussed earlier and priorities for funding requests, etc. These dates will not be scrutinized until they roll into the near-term milestones (FY + 2 or better.)

35. Table 4. The Title of Table 4 should match the FFA Appendix C – "Listing of Sites Which Require Further Investigation", and as such, should only include those sites (i.e. Sites 1, 2, 3, 12, 15, and 41 are deleted from this list. Site 50 could actually be foot noted.) Ensure that all other Sites requiring further investigation as described in the Section 4 Site Descriptions are included in the list. This is the list which will eventually become empty. This is also the list for which DHEC was inquiring about the new SWMU 21 and other potential SWMUs. EPA has recommended that the SMP could be modified to include additional Appendices as needed by the team, that might more accurately track other new SWMUs, rather than saying they need further investigation. EPA will be happy to discuss this further upon request.

36. Table 4. Please update status column as needed based on previous comments.

37. MCRD PI Document Milestone Schedule. This schedule spreadsheet is not required by the FFA. It contains dates other than those deadlines, milestones, and targets upon which the SMP is focused, and therefore could be seen as creating enforceable deadlines which are not appropriate. Additionally, it could also be interpreted to require a modification to the SMP to change any of these dates. EPA would like to discuss this document at each team meeting as previously done by the team. EPA requests that this document be removed from the SMP.

This concludes EPA's comments. Please do not hesitate to contact me at (404) 562-9969 about these comments. Again, EPA appreciates the effort made on this document.

Sincerely,

Lila Llamas

Lila Llamas
Senior RPM

cc: Jerry Stamps, SCDHEC
Don Hargrove, SCDHEC
Mark Sladic, TtNUS