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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON EXTENSION REQUESTS FOR
DOCUMENT SUBMITTALS FOR NEAR TERM MILESTONE DATES MCRD PARRIS ISLAND

SC

9/19/2007

U S EPA REGION IV

From: Koroma-Llamas.Lila@epamail.epa.gov
To: [Sanford, Art F CIV NAVFAC SE](#)
Cc: [Cook, Charles CIV NAVFAC SE](#); timothy.j.harrington@usmc.mil; darrel.pittman@usmc.mil; [Sladic, Mark](#); mmcrae@techlawinc.com; [Meredith Amick](#); BOWERSJB@dhec.sc.gov
Subject: RE: Milestone Extensions
Date: Wednesday, September 19, 2007 5:05:45 PM
Importance: High

Hi all,

My mother is home from the hospital and doing well. Thank you for all your well wishes!

I heard back from Arthur regarding the milestone extensions. Unfortunately, not in time to give Mark more time on the Site 12 LUC RD, but I am sure he did a fine job anyway. Arthur has granted some relief, but would like to see us complete our remaining FY07 commitments as early in FY08 as possible, preferably within the first quarter, so we can concentrate on our FY08 work load. The following should allow us to accomplish that:

We can move out the Site 1 LUC Completion Letter to give us time to work a draft. Please pick a date no later than October 29, 2007 for that milestone extension. I will have a rough draft to you this week.

We can move out the Site 12 LUC RD Draft Final as far as November 30, 2007. Please pick a date no later than that for this milestone extension. If we did this right, comments should be few, and and therefore the RTC and revisions should not be difficult or extensive either.

We can move out the Site 12 LUC Completion Letter to no later than December 30th. Please pick a date no later than that for this milestone extension.

I still can't tell exactly what you intend for the Site 3 PP and ROD. I am assuming the March date you referred to was for a D1 draft ROD. It is highly unlikely we can make a Final ROD by that date. As for comments, again, we do not intend to issue specific comments this round, only general comments based on the Team Agreement. However, resolution of differences between EPA, DHEC, and the Navy may make them more complex with regard to monitoring issues. Due to Joe's illness, DHEC's and David's travel schedule, and my personal issues, we have not yet reached final resolution, although we are still in communication with DHEC regarding the matter. Based on folks' schedules, the first chance to speak with DHEC again may be early next week. I, again, would like to propose a slight extension to the comment due date in order to allow this discussion, in order to resolve this prior to issuing comments. I feel we can resolve this or decide it is not resolvable no later than Friday of next week, being September 28th, 2007. I am willing to submit another request in writing for this extension, if you are amenable to the extension. Please let me know your position on this as soon as possible. Then based on this new comment due date the document milestones could be extended as follows:

Site 3 PP D1 Rev 2 Draft due on October 29, 2007

Site 3 PP D2 Draft Final due on January 29th, 2007

(This allows 2nd round comments by Nov. 29th 2007, & RTC by Dec. 29th 2007, which follows the FFA review and response times.)

The Team will need to schedule a meeting after that date for presenting the PP at a public meeting. If the Draft ROD is to be due March 27th, 2008, then it should be done before that date. (Heber, please add the scheduling of the public meeting to the agenda for our

next meeting if that works for you. Thanks.)

That's all I have regarding relief. You know the other dates. This should give you what you need to submit the milestone extension request letter.

Let me know if you have any questions.

Thanks,
Lila

-----"Sanford, Art F CIV NAVFAC SE" <art.sanford@navy.mil> wrote: -----

To: Lila Koroma-Llamas/R4/USEPA/US@EPA, "Cook, Charles CIV NAVFAC SE" <charles.cook2@navy.mil>, <timothy.j.harrington@usmc.mil>, <darrel.pittman@usmc.mil>
From: "Sanford, Art F CIV NAVFAC SE" <art.sanford@navy.mil>
Date: 09/18/2007 04:01PM
cc: <mark.sladic@ttnus.com>, <mmcrae@techlawinc.com>, "Meredith Amick" <AmickMS@dhec.sc.gov>
Subject: RE: Milestone Extensions

Lila,

Hope things are improving at the hospital. I did not send out the paper copy of the letter since I had not heard from you. The Site 1 LUC RD date has been met and the Site 12 LUC RD is under internal Navy/Marine Corps review and will be emailed to you and the team on Wednesday September 19. The explanations at the bottom of the extension letter are intended only to address the date changes mentioned in the letter rather than an explanation of the team process or to schedule future events without team input. The Site 3 Proposed Plan has been discussed a great deal with all parties and I am confident when the Navy receives the comments from EPA and SCDHEC and produces a D1 rev 2 the final copy should essentially be agreed upon. The SMP FY08 proposes a Site 3 ROD in late March 2008 and there will be full opportunity to have a public meeting and meet that date. This prediction all rests on the comments to be issued by EPA and SCDHEC on September 24. If they are simple, logical comments this works. It all depends on the complexity of the comments and that I cannot predict.

For the Site 3 sediment issue I have been in touch with Meredith and sent her (and the team) an email yesterday attempting to show the events that led to Priscilla Wendt, David Scaturro and Rob Pope agreeing at a partnering meeting that no further sampling of sediment was required. We need to find the proper manner to document this without wasting the American taxpayers money.

Hope this helps and hope your mom's condition improves.

Art

-----Original Message-----

From: Koroma-Llamas.Lila@epamail.epa.gov
[mailto:Koroma-Llamas.Lila@epamail.epa.gov]
Sent: Tuesday, September 18, 2007 13:49
To: Sanford, Art F CIV NAVFAC SE; Cook, Charles CIV NAVFAC SE;
timothy.j.harrington@usmc.mil; darrel.pittman@usmc.mil
Cc: mark.sladic@ttnus.com
Subject: Milestone Extensions
Importance: High

Hello Gentleman,

Art, I did not reply to your 2nd draft extension message, since you said you put my dates in. Did not think it was necessary. I assumed you knew I would agree to my own dates, and I thought you were just looking for buy-in and feedback from DHEC and/or other team members. Did you hear from them? Anyway, the delay has afforded us a potential further extension. See below.

Also - I got a voice message from Art this morning when I ran down to grab Bfast, but did not stop to make a call because I did not want to miss the doctors on morning rounds. I am still in the room with Mom. As weird as it seems, I just found out I can get the hospital's free wireless internet service in here, but my cell reception leaves much to be desired. Therefore this quick note:

Last week Arthur was not in the office so I could not really speak with him again regarding the extension requests. However, I was in long enough yesterday morning to start the process face-to-face. While he understands our situation, and is amenable to some relief, he cannot grant me relief until he in turn gets relief from his boss regarding year end targets. Here in the 11th hour we have met some of ours

anyway.

However, I am still trying to get relief from the Site 1 LUC Completion letter milestone. Arthur should let me know today or tomorrow, I hope. But just in case, I will draft the LUC Completion Letter language today, instead of the SMP alternative review times language, since we have more time on that than the current milestone for the LUC Completion Letters. Meanwhile, if you have drafted your own, go for it.

Also, I need to understand what the Navy/MCRD's plan is for the Site 3 PP and ROD. Art's e-mail indicated that neither the Navy nor MCRD would propose either accelerated review times or a December PP Public Meeting. I cannot understand how you plan to meet the draft FY08 ROD milestones without doing one, if not both of these. Also, to submit milestones that only afford accelerated review times (three weeks for each of us), but then say we as a team are not going to accelerate review times, then we are by effect ensuring we will not meet these revised milestones either. So I can only assume you know something I don't. It would help me in my discussions with Arthur if you could provide me with a comprehensive plan for processing the Site 3 PP (either D1 rev 2 and D2 (preferred), or just a D2 (not really doable without high likelihood of dispute)), a public meeting, draft ROD, and Draft Final ROD, while maintaining the FFA review times. You should also throw in what you are thinking regarding the timing of finalizing something for the administrative record regarding sediments, as well. If you respond to this e-mail I should be able to get it. Then I will be better prepared to answer Arthur's questions regarding this matter. To further complicate things, Joe was out sick, now David is out of town, so we still have not resolved the monitoring issue. However, it looks like Meredith is making some progress with coming up to date on the tech memo, etc.

Then I am not sure if we will get relief from the Site 12 Draft LUC RD or not. We may get a few days, but not likely past September 30th.

SO, anyhooooo.... Bottom line is, if you have not already sent the request for extension, you may want to wait and see what I hear from Arthur today or Wednesday.

If you can, reply to this with info on a Site 3 timeline and any other questions you may have regarding this, and I will get back to you as soon as I can, and/or when I hear from Arthur.

Thanks,
Lila
c) 770-856-5808.

P.S. Mom is doing really well.