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EMAIL REGARDING U S EPA REGION IV COMMENTS ON DOCUMENT SUBMITTAL
PROGRESS AND PROJECTED DATES MCRD PARRIS ISLAND SC
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U S EPA REGION IV

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Subject: Quick Look at what is owed by Navy/MCRD and/or EPA
Date: Friday, November 09, 2007 6:23:36 PM
Importance: High

Hi Folks,

On the last call it was asked if everything was up to date. I said I would have to look later. Well it is later, and I have only had a chance to glance, but.....

1) Site 1 LUC RD Draft Final - Rec'd a revision from Mark by the Deadline date, but not under Navy/MCRD Cover Letter. However, that revision still needed revisions and a revised/completed RTC. See my e-mail instructions to you all on September 28, 2007. Subsequently we have gotten an update on Site 12 that changes the EMS description. Please see below for feedback on changing that, then make Site 1 LUC RD match. I have not received the revised LUC RD, revised RTC, nor the Navy/MCRD cover letter. I said you could back date the cover letter, however, this needs to be done in a timely manner. I understand there are office set-up issues in Jacksonville, but at least there's the beach !

2) Site 12 LUC RD Draft Final - Rec'd from Mark by the Deadline date, but not under Navy/MCRD Cover Letter. However, one change is still needed to the descriptive language for EMS.

It is not sufficient to discuss what will happen in the future for a system that is not yet fully implemented. Please rewrite the portion following "...through a web-based portal." to describe how new staff assigned to the Depot identifies and attends awareness training necessary for his job, and the SOPs, points of contacts, reference documents, and training requirements that apply to the assigned work, during this interim period until the EMS is fully operational. Then you can also state what you already have here about how it will work once it is fully operational. Then revise your RTC to reflect whatever you wrote.

Otherwise, the RTC and revisions are fine, BUT I need the revised Doc and revised RTC submitted under Navy/MCRD Cover Letter. Again, backdate if you do this very timely.

3) Site 3 PP D1 Rev 1 - Rec'd revised document from Mark by the Target Date and the RTC a few days after that. Although this was not under Navy/MCRD cover letter, since it is an interim revision submitted on an unenforceable Target Date, I do not have to have this one under Navy Cover letter. David and I are still struggling with getting our arms around exactly what we have said here, what data in the administrative record supports what part of the remedy, and exactly what data the Navy/MCRD is still intending on collecting and for exactly what purpose, as well as along what time-frame. We will talk more about this at the meeting, but for now you can consider this target as met. You do not owe me anything on this right now. I guess I owe you.

4) I owe a response/approval on the Site 27 RIWP D2 submittal, now that I have the RTC. Anything else?

5) FY08 SMP - Rec'd from Mark by the Deadline date, but not under Navy/MCRD Cover Letter. I do have a couple of notes on this version, requesting changes be made before you submit under Navy/MCRD Cover Letter:

* This version still does not have the revised review/response times. I know I said I would try to get some draft language out to you, but due to circumstances this did not happen. However, I stated that if I was not able to get it to you, it should still be in there. I have now drafted some language and am proposing this be added a letter paragraph "d" to the document at the end of Section 2, after the letter "c" paragraph response (this is also attached in a Word file):

"d. As allowed for in Section 8.2 (a) of the FFA, the Parris Island Partnering Team has agreed to revise the review and comment periods for EPA and SCDHEC, as well as the response to comment and revision periods for the Navy/MCRD, on an annual basis as part of the SMP amendment process. This year the Team has agreed to timeframes as identified in the following table:

Document	EPA/SC	EPA/SC	Navy/MCRD	Navy/MCRD	Navy/MCRD	Approval
D1 - Draft Due	Comments 	Written Extension Request	RTC and Draft Final scoping	RTC and Draft Final Deadline	D2 Extension Request	Written Dispute
On or Before Deadline Date for Draft Document Submitta l (D1). See Table 2.	Due within 45 days of receipt of D1 Document.	20 days automatic ; more upon approval of other parties.	Within 75 days after comment period closes (including extension period if this applies) and before RTC/Draft Final Due Date.	On or Before Deadline Date for Draft Document Submittal (D2). See	20 days automatic; more upon approval of other FFA parties per Section XI of the FFA.	D2 is either approved or the dispute process should be initiated

The document review and comment periods should also be reflected in each Fiscal Year's Cooperative Agreement Workplan to be developed by the Navy and SCDHEC in consultation with U.S.EPA, consistent with requirements of the Department of Defense and State Memorandum of Agreement (DSMOA)."

* Site 8 Status needs some kind of explanation other than "Path forward under review". Please identify where in the CERCLA/RCRA process this is. (e.g. Needs PA, Needs SI, etc.)

* Site 3 needs to be added back onto Table 4. If I included it in previous instructions to remove, it was a mistake. You are only to remove Sites which have all actions completed and approved RARs. Hopefully we can get there soon on Site 3.

* SWMU 21 - Would like to discuss UST funding at the meeting, but no changes needed to the SMP.

* RANGES - Would like to discuss tracking of ranges briefly. EPA sees these as different from the New SWMU 21 issue in that the New SWMU 21 does not have any known release or threat of release, whereas the ranges do. However, EPA understands the Navy/MCRD are going through their own process for this right now and interagency agreements are not as clear as we need them to be. I agree to not put anything in this year, and we can talk more about this for future years.