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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON APPLICABLE, RELEVANT AND
APPROPRIATE REQUIREMENTS FOR RECORD OF DECISION FOR SITE 3 CAUSEWAY
LANDFILL MCRD PARRIS ISLAND SC
3/5/2008
U S EPA REGION IV

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Subject: ARARs in the Site 3 ROD
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Hi folks,

After our call on Friday, I spoke with David Buxbaum to get his gut reaction on ARARs for the Site 3 ROD. He confirmed what we thought. There should be very few ARARs listed in this Final ROD. Basically, he said, since we are adopting the Actions under the IROD as final, we can simply reference the IROD and state that the ARARs in that IROD were met, etc. Since we are adding Maintenance of the Landfill Cap, and requiring monitoring of Groundwater, we will need to list the ARARs that relate. I guess the Landfill Post-Closure Care regs, etc. for both? And if we anticipate one day closing the monitoring wells, include ARARs for well abandonment. Since there is No Action for sediments and/or surface water, therefore should be no ARARs. For the rest of the ROD it is LUCs, which also should not have ARARs, I believe, unless we tie into something on the fishing restrictions if FWS/DNR have regs that regulate contaminated waters requiring posting/restrictions.

There's your heads up from a gut reaction standpoint.

Thanks,
Lila