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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON REMEDIAL ACTION TECHNICAL
MEMORANDUM FOR SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC
9/12/2008
U S EPA REGION IV

From: Koroma-Llamas.Lila@epamail.epa.gov
To: Sladic, Mark
Cc: AmickMS@dhec.sc.gov; barkerjs@dhec.sc.gov; Jupin, Bob; charles.cook2@navy.mil; darrel.pittman@usmc.mil; Zimmerman, Greg; Kelly.Taylor2@ch2m.com; Whitten, Mike; mmcrae@TechLawInc.com; Frederick.Tim@epamail.epa.gov; timothy.j.harrington@usmc.mil; tom.dillon@noaa.gov; wendtp@dnr.sc.gov; cmarcussen@techlawinc.com; Koroma-Llamas.Lila@epamail.epa.gov
Subject: RE: EPA Comments on Site 3 RA Tech Memo 2008
Date: Friday, September 12, 2008 3:36:13 PM

Hi Mark.

These may seem like a lot of comments, but there is little or nothing we did not talk about on a call or in a previous meeting or in previous feedback to you in the "umpteen" versions which came before this D1 (first draft). Most of the comments ask for clarifying language to be added, not to question or make you redo a lot. I should hope that is the way your risk assessors see it. We can certainly discuss it. (See Charles).

I hope this was just a first gut reaction? When I gathered comments together I made sure to speak to each submitter about the impact of their comments. TL expressed to me that the overall writeup was o.k., but needed a lot of wholes filled in for explanations to complete the readers understanding. So if something sounds like it is being questioned, it may not really be in question, but just begging for explanation in the text. Tom expressed that in general the TM needed to be "more transparent." He does not have concerns with the levels he is seeing at the site. He does not expect different end results for the fish in the SLERA. In fact, he already ran the E&E model for mercury and all was fine. (We probably can share the spreadsheet with you ... let's talk.). If you screen out like instructed before modeling there may be few if any contaminants to model. And you are ONLY redoing the Mummichog and Red Drum. (You may have to come up with one more footnote to explain why the fish models look different from the other critters.) Tom feels the pesticide model can be done in an afternoon. So let's use his help and let's get this right so we can move on.

If it is the actual RTC you are concerned about, we can accept responses such as "Agreed" and move on. I do not recall anything in the call that the Navy/TtNUS and EPA disagreed on. And the document will be so different, I do not think it will be realistic to expect you to type in replacement text for each response, etc. I will let you off the hook on that this time, if Charles will. See DHEC for their response requirements.

As for the ROD, the real issue is the Proposed Plan. On the previous call way back in June? July? You said all you needed was a comfort level on the Surface Water Language in order to start the PP again. You submitted SW Language. I made 2 or 3 redlines and sent it back to you with instructions to put it in the body, not the appendix. That should be done. I did not hear from anyone else on SW. Did you? As for Eco - Again, based on Tom and Claire, the end result should be the same, just better explained and presented. As for HH Fish Consumption, if the 95% UCLs came back 1/2 the max, we should be in pretty good shape. I am hoping the new numbers come back and say no restrictions needed. Run the defaults with the 95% UCLs just for kicks and see what you get. But the bottom line is we need parameters for the fisherwoman. We have been talking about this need for about a year? And I know EPA provided specific feedback in writing many months ago, at

least

Alternatively, if the numbers come back still showing the need for fish restrictions, then we will have to revisit the pathforward that was agreed to, almost a year ago as well. But I covered that in my comments too.....

All this said and done, I owe the Navy feedback on schedules

Thanks,

Lila

"Sladic, Mark"
<Mark.Sladic@tetratech.com>
To
Lila
09/11/2008 06:27 AM Koroma-Llamas/R4/USEPA/US@EPA,
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Subject
RE: EPA Comments on Site 3 RA
Tech Memo 2008

Thanks Lila. Please note that the Team has not yet resolved the elements of the final remedy (LUC?, surface water considerations? Eco-risk?). In addition, NOAA has asked for extensive re-working of food chain modeling during the last conference call. The basis for our accelerated schedule for a Site 3 ROD was based on our expectation of receiving much less intensive comments on the Tech Memo (since this was effectively the umpteenth submittal for this effort). Therefore, at this time, please disregard the previously submitted accelerated schedule for this site.

We will provide a revised schedule soon. Thanks.

Mark Sladic, P.E.
Project Manager
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-----Original Message-----

From: Koroma-Llamas.Lila@epamail.epa.gov
[mailto:Koroma-Llamas.Lila@epamail.epa.gov]
Sent: Wednesday, September 10, 2008 6:40 PM
To: charles.cook2@navy.mil; koroma-llamas.lila@epa.gov; Sladic, Mark;
timothy.j.harrington@usmc.mil; mmcrae@TechLawInc.com;
AmickMS@dhec.sc.gov; darrel.pittman@usmc.mil; Kelly.Taylor2@ch2m.com;
barkerjs@dhec.sc.gov; wendtp@dnr.sc.gov; tom.dillon@noaa.gov
Cc: frederick.tim@epa.gov
Subject: EPA Comments on Site 3 RA Tech Memo 2008
Importance: High

Folks,

Here are EPA's comments. Hard copy coming in the mail.

Call me with questions..

Lila

(See attached file: 08 09 10 PI Site 3 2008 RA Tech Memo - EPA
Comments.pdf)