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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT FINAL SITE
MANAGEMENT PLAN FOR FISCAL YEAR 2009 MCRD PARRIS ISLAND SC
12/16/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303**

December 16, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SF-FFB

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Charles Cook
PO Box 30
North Ajax Street, Bldg 135
Jacksonville, FL 32212-0030

And

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs
Attn: Tim Harrington
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: Draft Final (D2) FY09 Site Management Plan (SMP), Marine Corps recruit Depot (MCRD), Parris Island, South Carolina (October 2008) received in December 2008.

Dear Sirs:

The Environmental Protection Agency (EPA) has reviewed the MCRD FY09 SMP and the associated Response To Comments (RTC). The review has resulted in this conditional approval letter, which contains some final comments which do not require a response, and conditions which must be met in order for this approval to remain in effect and to avoid dispute. The Navy/MCRD has until January 6th, 2009, to respond to this conditional approval, providing the requested final change pages and/or negotiating revised acceptable final language, either one to be submitted via change page; or by disagreeing in writing with the conditions of this approval. EPA's comments and conditions are as follows:

Comments:

1. While the response to EPA's comment #1 was adequate [comment #1 pertained to 1) reconciliation of dates in the SMP text and tables with dates in approved extension

requests, and 2) reconciliation of dates in the text with dates in the tables and across tables], the execution of the response is incomplete due to the timing of the latest Extension Letter Request Approval and issuance of this D2 document, as well as other causes. Therefore, EPA has set conditions below which attempt to reconcile the remaining discrepancies and minimize change page requirements (as opposed to many pages throughout the text of the document) by relying only on Table 1 for enforcement purposes and by requesting an updated Table 1 which resolves problems identified.

2. Within the text, only D2 milestone dates have been included, whereas, in accordance with current team practices, both D1 and D2 dates are to be primary deliverables and as such are milestone in Table 1. Therefore, EPA has set conditions below which clarify the enforceable documents and corresponding deadline dates are those FY09 dates listed in Table 1 (to be revised).

The MCRD FY09 SMP is approved provided the following conditions:

Conditions for Approval:

1. Since there are discrepancies between the text and Table 1, as well as approved extension dates, the Navy/MCRD agrees that for enforcement purposes, Table 1 (to be revised) contains the documents and corresponding FY09 dates which are to be considered deadlines within the context of the MCRD Parris Island Federal Facilities Agreement (FFA).
2. Change the following dates/text in Table 1 and submit the change page by January 6th, 2009:

| Site/Doc | Current D1 SMP Date | Current D2 SMP Date | Revision | Reason |
|---------------|---------------------|---------------------|---|---|
| 3/ LUCRD | 22 November 2008 | | 6/11/2009 | Ext approved Nov 3, 2008 |
| 3/ LUCRD | | 05 May 2009 | 05 Aug. 2009 (or any date after 6/11/2009 but before 25 November 2009) | D2 cannot precede D1 but must precede the LUC Letter. |
| 7/ RIWP | 17 May 2009 | | Change FY09 column text to read "RI/FS Work Plan D1" | D1 is milestone in FY09 |
| 14/ RIWP | 14 June 2009 | | Change FY09 column text to read "RI/FS Work Plan D1" | D1 is milestone in FY09 |
| 27/ FS Report | 23 November 2009 | | Change FY09 column text to read "FS Report D1" | D1 is milestone in FY09 |
| 45/FS Report | 27 June 2009 | | Change FY09 column text to read "FS Report D1" | D1 is milestone in FY09 |

If the Navy/MCRD disagrees, a written statement of disagreement should be submitted immediately to cancel this approval. Subsequently the Navy/MCRD should initiate dispute proceedings. Otherwise, the Navy/MCRD should respond to this letter, providing the requested change pages by January 6th, 2009.

In previous comments to the Navy/MCRD EPA has requested the closed ranges/MRP sites be identified and added to the SMP. EPA realizes this has not happened in this SMP, but understands that work is proceeding in FY09 to GPS locate the borders of these sites and use those borders to then clearly identify "MRP sites" (meaning those areas identified as no longer being active and which are not overlain by active sites). Once the sites have been clearly identified they should be added to the FFA list of Sites and to the FY10 SMP.

EPA appreciates the coordination efforts put forth by the Base and Navy in developing a Site Management Plan as comprehensive as this one. If there are any questions, please do not hesitate to contact me at (404) 562-9969 about these comments and conditions.

Sincerely,

Lila Llamas
Senior RPM

cc: Meredith Amick, SCDHEC
Sommer Barker Streett, SCDHEC
Mark Sladic, TtNUS