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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON DEFINITION OF SITE 14 FROM
RESOURCE CONSERVATION AND RECOVERY ACT FACILITY ASSESSMENT MCRD
PARRIS ISLAND SC
7/20/2009
U S EPA REGION IV

From: Llamas.Lila@epamail.epa.gov
To: [Sladic, Mark](#); [Meredith Amick](#); [Cook, Charles CIV NAVFAC SE](#); [Annie Gerry](#); [mac mcrae](#); [Churchill, Peggy](#); [Sarah M CIV NAVFAC SE Reed](#); [tim harrington \(email\) \(timothy.j.harrington@usmc.mil\)](#); Llamas.Lila@epamail.epa.gov; tom.dillon@noaa.gov; wendtp@dnr.sc.gov
Subject: Re: RFA on MCRD PI FTP
Date: Monday, July 20, 2009 11:40:51 AM
Attachments: [pic06650.jpg](#)
[pic17353.jpg](#)

Hi Folks,

Yes, the documents are correctly labeled on the ftp. However, the referenced material clarifying the definition of Site 14 was from the IAS, not the RFA. So what we need to make sure we do is document how we got to where we are on the SI for Site 14. The IAS information provided by the Navy on page 2-14 (see below) more clearly defines Site 14, stated as follows "These outfalls constitute Site 14." But it also recommends against any confirmation study based on the numerous outfalls, transient nature of surface water and tidal influences, and several annual severe storms. The RFA, on page III-20 (see below), clearly describes the "Unit" as an underground pipe system, then goes on to state that the "system" discharges to "60 outfalls (Site14)." The RFA recommends "RFA Phase II Sampling" but is not specific as to pipes, outfalls, etc. In closing comments on the SMWU description, the RFA mentions that "releases to soil and groundwater are dependent upon the integrity of the unit." It further states that files did not clearly indicate as to whether or not outfalls NOT utilized by the sanitary wastewater treatment plant are covered by an NPDES permit and recommends that the facility and SCDHEC determine if an NPDES permit is required.

Therefore, we need to document (from meeting discussions, FFA negotiations, the IAS and RFA, etc.) how we decided to define Site 14 as just the outfalls, but still agreed to do an SI level investigation. And we need to answer the question as to need for an NPDES permit for the NON-sanitary system outfalls, to ensure that all are covered as necessary, justifying the definition of the Site as just outfalls, I guess.... That's sort of how it went in my head, anyway. Since this has not been clearly presented elsewhere, it should be addressed in the SI documentation.

And we need buy-in from the trustees on all this as well, Tom and Priscilla : -) Please indicate your understanding and acceptance of this approach. See meeting minutes and Peggy's writeup-to-come for more detail. Bottom line is, Site 14 is defined as the outfalls and associated sediments (as well as gw, I think), and no upstream investigation will occur unless exceedances are found at a particular outfall, at which time upstream sources will be investigated to determine 1) if the source is continuing or historical, and 2) if other media are potentially contaminated upstream. At that point, the involved upstream pipes and contaminated media become a newly identified site and the contaminated outfall will be addressed within this newly identified site. If outfalls are found to have exceedances but no upstream sources or additional contaminated media are found, then these outfalls will be addressed within Site 14. Did I get that right, team? SCDHEC and EPA will be checking to see if this is consistent with other Naval facility outfall investigations, or at least that this approach is acceptable, even though somewhat different from previous agency investigations.

IAS

RFA

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cc
Subject
RFA on MCRD PI FTP

Good morning. At this week's Team meeting, during the Site 14 Storm Sewer Outfall segment, we had some discussion about whether a document I posted on the FTP under the title of 'MCRD PI RFA' was in fact the RFA or maybe something else, such as the IAS. I do not know if what follows is necessarily the definitive answer, however the PDF document on the FTP has as page 1 a transmittal letter on EPA letterhead (Kelly Ewing to Johnsie Nabors) identifying the document as the RFA. For questions, please see the posting on the FTP. I think I copied everyone that was at the meeting. If I missed any, please forward this. Lila - thanks again for taking time out of your vacation to come play with us. thanks all.
MS

MCRD PI FTP at this link:

<ftp://ftp.ttnus.com/Public/PARRIS%20ISLAND%20MCRD%20-%20Mark%20Sladic/>

There are subdirectories.

The logon name is tt\ftpuser and the password is Wednesday08.

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