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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON DATA QUALITY OBJECTIVES
FOR WORKSHEETS FROM REVISED SAMPLING AND ANALYSIS PLAN FOR SITE 27
EQUIPMENT PARADE DECK AREA MCRD PARRIS ISLAND SC
5/14/2010
U S EPA REGION IV

From: Llamas.Lila@epamail.epa.gov
To: [Annie Gerry](#)
Cc: [Meredith Amick](#); [Joe Bowers](#); [Charles CIV NAVFAC SE Cook](#); [heber pittman](#); [Stacey French](#); [Kent Krieg](#); [Sladic, Mark](#); [mac mcrae](#); [Pat Franklin](#); [Churchill, Peggy](#); [Smith, Preston](#); [timharrington \(email\)](#) (timothy.j.harrington@usmc.mil); [PriscillaWendt \(E-mail\)](#); Llamas.Lila@epa.gov
Subject: Re: Parris Island Site 27 - interim WS"s for EPA request
Date: Friday, May 14, 2010 3:59:16 PM

Annie (and others),

I am sorry you still believe something improper has taken place. I am not sure how to explain it differently. I agree with your interest in better communications, I just obviously do not understand exactly what the state wants. I also think communication is a two way street and we all need to work on both sides of that street.

As for not copying the State on every email exchanged between the Navy and EPA, I guess we have a different understanding of what was discussed and agreed to at the meeting. I recall discussing our formal distribution list very briefly relative to the entire meeting agenda. I do not recall any agreement that this list would be used for every communication between any and all members of the team.

There have not been any decisions made in emails. EPA has responded to a request from the Navy/Tetra Tech for additional information pertaining to EPA's comments specific to field screening methodologies and only those comments. The Navy/Tetra Tech's request for additional information on EPA's suggested list of field screening options was initiated at the meeting. SCDHEC was obviously aware of the request, since they in turn asked to be included when the Navy and EPA had a conference call. What little exchanges took place to date were in setting up that call and clarifying what we needed from each other in order to meet each others needs on the call. This was done in order to have a chance at a successful call. SCDHEC was included in the notice of the call and the distribution of the WS's at the same time as EPA. I am just not sure how else to have done this.

As for the Navy and EPA making decisions for the whole team, that is simply not the case. The Navy/Tetra Tech is required to respond to both EPA and SCDHEC's comments. Discussions that took place were a normal part of that process, which occurs through emails, individual calls, conference calls, etc. whatever it takes to get the comments resolved. I assume the same is being done with the state if any state comments are of the nature that require discussions to be resolved. My understanding is that the Navy/Tetra tech will identify when comments from EPA and SCDHEC are in conflict with each other, and will attempt to resolve those comments with both parties. I have to assume this is the way things are being managed.

As for EPA making the Navy do extra work, that is not the case either. The Navy is supposed to include responses to comments in their revised documents. This work must be accomplished some time or another. I cannot control when the Navy does work. I am responsible for responding to the Navy when they need assistance with resolving EPA comments.

Maybe we can talk about this at the conference and try to understand each others needs and desires. Not sure when we would fit that into an already full agenda, but I am game if the team is.

From: "Annie Gerry" <GerryAM@dhec.sc.gov>

To: "Meredith Amick" <AmickMS@dhec.sc.gov>, Lila Llamas/R4/USEPA/US@EPA

Cc: "Joe Bowers" <BOWERSJB@dhec.sc.gov>, "Stacey French" <FRENCHSL@dhec.sc.gov>, "Kent Krieg" <KRIEGKM@dhec.sc.gov>, "PriscillaWendt (E-mail)" <wendtp@dnr.sc.gov>, Lila Llamas/R4/USEPA/US@EPA, "Pat Franklin" <pat.franklin@mail.com>, "Charles CIV NAVFAC SE Cook" <charles.cook2@navy.mil>, "mac mcrae" <mmcrae@TechLawInc.com>, "Mark Sladic" <Mark.Sladic@tetrattech.com>, "Peggy Churchill" <Peggy.Churchill@tetrattech.com>, "Preston Smith" <Preston.Smith@tetrattech.com>, "heber pittman" <darrel.pittman@usmc.mil>, "timharrington (email) (timothy.j.harrington@usmc.mil)" <timothy.j.harrington@usmc.mil>

Date: 05/14/2010 02:14 PM

Subject: Re: Parris Island Site 27 - interim WS's for EPA request

Lila et al,

I just had a couple questions/comments. First, why weren't us at the State and Pat Franklin copied on the when this discussion of this 'white paper bullet briefing' was discussed with the Navy? At our last meeting, we spent FOREVER talking about communication and how this team doesn't communicate and to rectify that, we were gonna copy everyone on email correspondence. Again this is just another example of how the Navy and EPA make decisions without discussing this with the whole team.

Since EPA has decided to make the Navy do this extra work, without telling us at the State, my well approval for the Motor T facility/Site 27 might need to be retracted. This is the first I have heard about this 'white paper bullet briefing' and now it looks like we aren't moving forward as planned.

I do not believe Marks email was unclear. For future reference, I think it is a good idea for all of us on this team to remember that we need to practice better communication skills with each other.

Annie

~*ANNIE GERRY*~
Geologist/Hydrologist I
SC DHEC
Division of Waste Management
Stern Office Bldg #1020
Phone Number: 803-896-4018

>>> <Llamas.Lila@epamail.epa.gov> 5/14/2010 1:07 PM >>>

Hi Meredith and others,

Nothing has changed with respect to consensus decisions from EPA's perspective. To my knowledge the Navy will still be proceeding at risk on the Site 27 sampling effort. However, if you recall, at the meeting the Navy/Tetra Tech mentioned that they have to have Navy concurrence on the sampling plan before they can proceed. I am not sure how they will do that without EPA's and SCDHEC's concurrence in the UFP QAPP/SAP process, but they must feel they can do that with just their chemist's approval, etc. But I think I recall last time the chemist would not approve it until he knew we had seen the QAPP.... Anyway, they also mentioned a desire to get some follow-up information from Scott and Bruce about the field screening approaches mentioned in EPA's comments. At that time in the meeting, SCDHEC requested to be notified of the call date if we have one. Thus the notification from Mark in this email about a call to resolve some of EPA's comments.

I think the email Mark sent was a little misleading. Charles and I have had a couple of calls in which we discussed what was needed to make this call happen. Mark had requested info on the various field screening/targeting methods mentioned in our comments. Scott and Bruce said there wasn't a comprehensive cheat sheet on the various methods all pulled together in one easy reference, but that plenty of info on each method was available on the internet. In order to meet a request from Tetra Tech about what EPA needed, the Navy described a small bit of what they were now intending to do in the field. It was determined that perhaps we are not that far apart any more, but without something in writing in response to our comments it was difficult to tell exactly what their plan would now look like. EPA suggested the Navy provide a 1-2 page white-paper bullet-briefing fairy-dust sheet with a revised sampling figure to describe what they are now intending their sampling plan to address, and how they would address it in the field. Then EPA could provide info on whatever field screening method we felt might still benefit the Navy, if any at all were still needed beyond whatever the Navy was now proposing. It appears based on Mark's email, that he decided to send updated WS's instead of the magic paper, likely because he had to do this anyway for Navy approval of the UFP QAPP/SAP, and because EPA had requested revised WS's in response to EPA comments from the start. And that brings us here to where we are.

This effort may result in the Navy feeling less risk is being taken as they proceed, but it will not let the Navy avoid risk completely, given there will not be a complete approved UFP QAPP when they hit the field. However, EPA still expects the UFP QAPP/SAP to be revised and submitted for review and approval, regardless of whether this occurs prior to or after their field sampling event. As we experienced before with Site 3, there are a lot of little details in the QAPP (details on analytical methods and analysis, risk calculations, etc.) that can still cause problems.

Also, EPA has reminded the Navy that we need to be notified of the sampling event well enough in advance so EPA can observe the sampling event, even though they are proceeding at risk.

If there are any more questions or concerns, let me know.

Lila

From: "Meredith Amick" <AmickMS@dhec.sc.gov>

To: "Joe Bowers" <BOWERSJB@dhec.sc.gov>, "Stacey French" <FRENCHSL@dhec.sc.gov>, "Annie Gerry" <GerryAM@dhec.sc.gov>, "Kent Krieg" <KRIEGKM@dhec.sc.gov>, "PriscillaWendt (E-mail)" <wendtp@dnr.sc.gov>, Lila Llamas/R4/USEPA/US@EPA, "Pat Franklin" <pat.franklin@mail.com>, "Charles CIV NAVFAC SE Cook" <charles.cook2@navy.mil>, "mac mcrae" <mmcrae@TechLawInc.com>, "Mark Sladic" <Mark.Sladic@tetrattech.com>, "Peggy Churchill" <Peggy.Churchill@tetrattech.com>, "Preston Smith" <Preston.Smith@tetrattech.com>, "heber pittman" <darrel.pittman@usmc.mil>, "timharrington (email) (timothy.j.harrington@usmc.mil)" <timothy.j.harrington@usmc.mil>

Date: 05/14/2010 10:10 AM

Subject: Re: Parris Island Site 27 - interim WS's for EPA request

Hi team,

The Department is confused as to what these worksheets are. A consensus decision (which did not include these worksheets) was made in the April 2010 team meeting that would allow the Navy to proceed at risk. The Department stands by the consensus decision that was made in the team meeting and will be unable to attend the Monday morning conference call. Please note that if anything in these worksheets or anything discussed in the call changes the consensus made in the meeting, the Department has the right to reevaluate their decision.

Meredith

>>> "Sladic, Mark" <Mark.Sladic@tetrattech.com> 5/14/2010 9:00 AM >>>
Please see attached select worksheets (and supporting material) from the upcoming revised Site 27 SAP. The select worksheets (11, 17, 18) provide the information requested by EPA to mitigate the 'at Risk' mobilization. For those intending to participate, we'd suggest at Monday 9:00 AM conference call to receive any EPA (or other) comments (or concurrence) on the WSs. I believe SCDHEC has already concurred to letting the Navy proceed at risk. I am uncertain if following review of this material, EPA will consider some level of concurrence, or will still expect that Navy is proceeding entirely at risk. Please let us know if the proposed call scheduling will support whatever determination EPA intends regarding degrees of at-risk. I am using what I believe is our new consensus distribution list, however, please forward this material as necessary. Thanks.

Mark Sladic, P.E. | Project Manager
Direct: 412.921.8216 | Main: 412.921.7090 | Fax: 412.921.4040
mark.sladic@tetrattech.com <<mailto:mark.sladic@tetrattech.com>>

Tetra Tech NUS, Inc
661 Andersen Drive Foster Plaza 7 | Pittsburgh, PA 15220 | www.ttnus.com

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