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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON DOCUMENT SUBMITTALS FOR
FIVE YEAR REVIEW AND SITE MANAGEMENT PLAN FOR FISCAL YEAR 2010 AND
OVERSIGHT OF FIELD ACTIVITIES AT SITE 27 MCRD PARRIS ISLAND SC

7/6/2010

U S EPA REGION IV

From: [Cook, Charles CIV NAVFAC SE](#)
To: [Sladic, Mark](#)
Subject: FW: Follow-Up Reminder to Phone call
Date: Friday, July 09, 2010 2:34:33 PM

Mark

Below is a summary of a discussion with EPA. Based on the discussion on site 45 RI addendum, we still need to be aware of EPA's comment to assure we meet the dec2010 submittal date.

V/R

Charles Cook

NAVFAC SOUTH EAST , SOUTH CENTRAL IRP
PO BOX 30 , 135 AJAX DR,
Jacksonville, FL 32212
(904) 542-6409

-----Original Message-----

From: Cook, Charles CIV NAVFAC SE
Sent: Thursday, July 08, 2010 16:42
To: Reed, Sarah M CIV NAVFAC SE, JAX
Subject: FW: Follow-Up Reminder to Phone call

fyi

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-----Original Message-----

From: Llamas.Lila@epamail.epa.gov [<mailto:Llamas.Lila@epamail.epa.gov>]
Sent: Tuesday, July 06, 2010 15:25
To: Cook, Charles CIV NAVFAC SE
Subject: Follow-Up Reminder to Phone call

Hi Charles,

Just for the record, here's what we just discussed as needing to be done.

1) 5YR - Revised document addressing attorney comments should be submitted ASAP.

2) SMP - The Site 45 RI Addendum Report D1 was insufficient to address EPA's comments and concerns. The Revised D1 ("D2") had new material which had not been previously reviewed and was insufficient for approval as either a revised D1 or a D2. The SMP due date of December 30, 2010 for the RI Addendum Report D2 still stands as enforceable. The current Team agreement is to issue an RI/FS, therefore, even though the FS D1 is not targeted until after December 30, 2010, the FS D1 needs to be submitted along with the RI D2 by September 30, 2010. (Reminder, if the previously revised RI Addendum Report were to be accepted as a D2, a finding of technically insufficient would have been made and dispute invoked with potential penalties assessed if not resolved prior to the December 30, 2010 deadline. Keep this in mind as you submit documents to meet future deadlines. Insufficient D2s can be disputed and assessed penalties even if the document is submitted prior to the deadline, if the deficiencies are not resolved prior to the deadline.)

3) Site 27 oversight. The proposed date of July 20 is not manageable to EPA for oversight of the soil

cores closest to the Site 55 border and within the proposed facility footprint. These cores are of utmost concern to EPA. EPA could arrive on-site the evening of July 21, and be ready to participate at whatever time fieldwork would begin the morning of Thursday, July 22, 2010. Please advise immediately if these needs could be accommodated by either a one or 2 day delay in field mobilization, or by shifting site field work to ensure those cores of interest are not drilled until the morning of July 22.

4) Site 27 oversight. Since time will not allow the Site 27 SAP review/comment/RTC/revision process to complete prior to field efforts, EPA has requested the Navy provide the Navy Chemist's comments immediately, and TTNUS' Responses To Comments as soon as they are available. This will help to enable EPA to provide oversight which may allow a more favorable outcome to proceeding at risk.

5) Site 27 Soil Cores. EPA had requested a boring be placed in the vicinity of the FMP12 MIP Location. EPA has also requested the MIP locations be located on Site maps in the SAP. Since this was not done, it is difficult to tell if a soil core was co-located and/or in line with FMP 12. By attempting to glance at 3 maps at once, it appears the soil location may not be close enough to the previous FMP 12 location to satisfy EPA's concerns. Either provide a map with the FMP locations included with the proposed sampling locations to validate the co-location, or add a another core to meet EPA's concerns.

6) Site 27 Field Methodologies and Approaches. EPA understands the Navy will provide the updated paper on Field methodology details including the Red-O Ribbon and other field test kits.

Any questions, let me know.

Lila
404-562-9969