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MCRD PARRIS ISLAND  
5090.3a

LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT SITE MANAGEMENT  
PLAN FOR FISCAL YEAR 2011 WITH ATTACHMENTS MCRD PARRIS ISLAND SC  
7/27/2010  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4**

**Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960**

July 27, 2010

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

4SD-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: EPA Review of the FY2011 Draft Site Management Plan (SMP) for the Marine Corps Recruit Depot (MCRD), Parris island, South Carolina (June 2010)**

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document and offers the following comments:

**GENERAL COMMENTS:**

- 1) **Tables and DUE DATES in text throughout document** – A majority of dates in Tables 1 and 2 are not acceptable. It appears there were significant typos due to inaccurate cut and past from columns and rows. EPA does not consider this D1 as an actual request for extension dates, but rather as typos as they appear, therefore, if the Navy actually intended these as requests for extensions or changes to the SMP, they should notify EPA immediately. EPA does not approve

any extensions or changes to Near-Term Milestones in this SMP Update D1. Attached to this letter (and to a corresponding email) is a redline version of Tables 1 and 2 based on approved Extended Deadlines (which cannot be extended via an SMP change), as well as suggested revised SMP D1 and D2 projected dates for certain other primary documents. Please modify Tables 1 and 2 as indicated in the redline files then record the corrected information back in the text of the document as appropriate. Check to make sure dates in the text match dates in the Tables, which should also match previously approved extension dates as applicable.

- 2) **Planned Non-Time Critical Removal Action (NTCRA), associated secondary documents, and corresponding target dates** – EPA understands the Navy is anticipating taking a NTCRA at Site(s) 55 and/or 27, and/or 9, and/or 16. NTCRAs should be identified and target dates established for associated secondary documents. Please clarify if NTCRA's are planned, and if so, specifically identify them in this SMP Update. Additionally, even though documents supporting the removals would not be considered primary documents, they are considered secondary documents according to Federal Facilities Agreement (FFA) Section VIII, paragraphs 8.4(a)(2), 8.4(a)(5), and 8.4(a)(9) and should have target submittal dates identified in the SMP, as required by FFA Section XII, Paragraph 12.4(c). For the definition of "Target Dates", please see FFA Section II, Paragraph 2.1(gg). Identification of these target dates would allow for proper review of Milestone dates for corresponding primary documents and would assist in work scheduling. (See Specific Comments for details of changes needed in this SMP Update.)
- 3) **Reminder regarding previously approved milestone extensions** – EPA appreciates the Navy abiding by the previously approved extensions to milestones. Simply as a reminder, Deadlines and Near Term Milestones previously approved via an extension request letter are not to be extended via an SMP Update, but rather via a new Extension Request letter. In your revision to this SMP D1, please ensure you continue to maintain the approved extension dates in your D2 submittal. Also, within the text of the document, if the dates fall within FY11 they should be included at the end of each Site Description and FY11 Document Deliverables Section. Adhering to these requirements will help to ensure the D2 SMP is approvable.
- 4) **Table 2** – As you will see in the redline file for Table 2, the years in the columns have been corrected to reflect Out Year Milestones as FY+3, FY+4, and FY+5. This resolves the duplicated milestones for FY13, but left the new column "FY16 and Later" blank. Suggestions have been added for this column. Please give additional thought to the Out-Year Milestones based on the projected Near-Term Milestones for Sites currently under investigation, and add any Sites activities which you project will be initiated during those out-years, in order to reflect what the Navy is actually anticipating. Update Table 2 accordingly, after making the changes in the redline files.
- 5) **COVER PAGE** – Simply as a reminder, please ensure the D2 submittal accurately reflects the version and date we are working on. The revised document should be dated whenever you complete your revision and would read "DRAFT FINAL (D2)". This also applies to the Headers on each page of the document. The dates in the Footers, on Tables 1, 2, and 3 also need to be updated with each revision.

#### **SPECIFIC COMMENTS:**

- 6) **Section 2, Annual Updating of the SMP, Page 7** – Paragraph b of the Navy's response states "No critical or non-time critical removal actions (NTCRA) are planned." This is not EPA's

understanding of the Navy's plans. Please clarify if NTCRA's are planned, and if so, specifically identify them in this paragraph. (See General Comment #2)

- 7) **Section 5, Site Descriptions and FY11 Document Deliverables** – Even though documents supporting removals would not be considered primary documents, they are considered secondary documents and target dates should be included in this Section if they fall in FY11. Please modify the SMP Update to identify secondary documents with current FY Target Dates for each site, in addition to the Primary Deliverables already identified. (See General Comment #2)
- 8) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 4** – Please correct the text. The SI/CS Draft Final now recommends No Action/No Further Action. Please resolve this with the SMP text regarding recommendations as well as funding.
- 9) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 5** – The RI/FS Workplan D2 is due 30 November, 2010 in accordance with approved extension dates. Please add this primary document submittal to this section and ensure it is correct in the Tables. The RI Report D1 currently identified in this Section has a date that is inconsistent with the date listed in the Tables. Please ensure the correct date is included in the Table. Regardless of which date is correct, either date falls in FY12 and should not be included in this Section of the text. If the date should be changes to be a date within this FY, then correct the date in the text and table and leave the item in this section of text.
- 10) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 9/16/27/55** – For these sites, identify if a removal action is planned or not. Indicate so in this section text for each site if there is to be a removal, and include target dates for secondary removal documents if they fall within FY11 (otherwise if they fall outside FY11, include them in the appropriate table.) (See General Comment #2.)
- 11) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 14** – The text indicates sampling to support the Site 14 RI will include a former OWS location near a storm Sewer Outfall on Elliot's Beach. The text goes on to state a "work plan" is in progress, but does not specify SI or RI work plan. Please clarify. EPA understands the work plan is for an SI investigation. However, if the site is in the SI stage, it cannot be known if the Site will need an RI investigation or not. Please explain what is to happen with the subject OWS if Site 14 does not require an RI. (Note: The agreement was that if contamination is found at Site 14 outfalls and can be linked to a known process site, that contamination will be addressed with the known process site, rather than Site 14, therefore, it may be plausible that Site 14 will not need an RI.)
- 12) **Section 5, Site Descriptions and FY11 Document Deliverables, SWMU 21** – EPA has requested the projected project completion date for the OWS removal under the UST program several times. The Navy should either provide the UST schedule within this text in Section 5 and/or include a milestone date for completing the RI for SWMU 21 OWS in the text/tables.
- 13) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 27** – The text herein under the Status paragraph mentions a "Remedial Action Contract" which has been issued for this site. Please clarify in the text if this is for a removal or a remedial action. (Also see Sites 9/16/27/55 comment above regarding target dates for the removal documents.)
- 14) **Table 3 and Section 5, Site Descriptions and FY11 Document Deliverables, Site 45** – In the Primary Deliverables table in this section, please identify the RI Addendum scheduled for 30 December, 2010 as the D2 version (and in Table 1 also.)

- 15) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 53** – Since ESVs were exceeded and contaminant sources were only removed in part, this triggers the need for a Remedial Investigation (RI) under CERCLA for this site. Please update the text accordingly.
- 16) **Section 5, Site Descriptions and FY11 Document Deliverables, Site 55** – The text herein under the Status paragraph mentions a “Remedial Action Contract” which has been issued for this site. Please clarify in the text if this is for a removal or a remedial action. (Also see Sites 9/16/27/55 comment above regarding target dates for the removal documents.)
- 17) **Table 1 and Section 5, Site Descriptions and FY11 Document Deliverables, Site 9/16/27/55** – For these sites, the RI Report D1 and D2 Deadlines were extended via an extension request letter and therefore may not be extended via an SMP Update. Please ensure the deadlines and/or milestones for these document submittals do not change from those approved in EPA’s approval letter for the corresponding extension request. EPA assumes typos in Table 1. Therefore, no deadline for FY11 needs to be in the Section 5 text for these sites. However, the milestone dates in Table 1 should be corrected.
- 18) **Table 3 and Section 5, Site Descriptions and FY11 Document Deliverables, MRS/MMRP Sites** – In accordance with EPA’s OSWER Directive 9200.3-60, Military Response Sites (MRS)/Military Munitions Response Program (MMRP) Sites which are within the boundary of an NPL Site, should be added to the FFA as soon as practicable, together with an enforceable schedule of milestones, including primary and secondary documents. Please add all such sites known to the Navy/MCRD to Table 3, Annual Update For FFA Appendix C Sites, and describe each site in Section 5 of the SMP Update. This should include at least those 8 inactive and closed MRS Sites for which a Site Investigation (SI) was recently conducted at MCRD, as well as those listed in the MMRP as inactive and closed under the MMRP Preliminary Assessment (PA) document. Additionally, if there are any MRS Sites on MCRD which are inactive and closed but for which a PA has not yet been conducted (needs PA), these should be added to Table 3 as well. Please update Table 3 accordingly and include Site Descriptions for each Site in Section 5. Milestones and target dates should coincide with the prioritization schedule generated by the Munitions Response Site Prioritization Protocol (MRSP) if available.
- 19) **Table 1** – There appears to be multiple typos in Table 1 due to cut and paste errors associated with columns and rows. Please correct these in accordance with the attached redline provided by EPA. If the Navy/MCRD does not agree with the suggested changes, the Navy should contact EPA and negotiate alternative dates to ensure approval of your D2 submittal. EPA does not approve any extensions to near-term milestones which may have been inferred based on these typos. If any extensions are being requested, the Navy should contact EPA regarding these prior to the D2 submittal. See General Comment 1 above, as well as any other comment which may impact Table 1 dates.
- 20) **Table 2** – Please correct Table 2 in accordance with the attached redline provided by EPA. If Navy/MCRD does not agree with the suggested changes, the Navy should contact EPA and negotiate alternative dates to ensure approval of your D2 submittal. See General Comment 4 above, as well as any other comment which may impact Table 2 dates.
- 21) **Table 1 and 2 or New Tables** – Target Dates for secondary documents should be included in a Table as well. They could be added to the “Table 1” as a Near-Term Target Date if you modify the Table 1 title to allow for Near-Term Target dates also. It is suggested to create a separate additional table below the Milestones based on Extensions to clearly separate primary deadlines from secondary targets. The same could be done for secondary target dates in the Out-Years for

Table 2. Otherwise, new tables for secondary target dates Near-term and out-year need to be added. (See General Comment #2.)

- 22) **Table 3** – Please review Table 3 Status column information and ensure it is accurate according to current team agreements and progress made to date. See comments above which may impact Table 3 Sites and associated information.

This concludes EPA's comments. If there is any way EPA can assist in helping you to address these comments or to meet milestones, please do not hesitate to call me at (404) 562-9969.

Sincerely,



Lila Llamas  
Senior RPM  
Federal Facilities Branch  
Superfund Division

Attached: EPA Redlines of Tables 1 and 2.

cc: Meredith Amick, SCDHEC  
Annie Gerry, SCDHEC  
Mark Sladic, TtNUS ✓

**TABLE 1  
NEAR TERM MILESTONES  
SITE MANAGEMENT PLAN  
MCRD PARRIS ISLAND**

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**NEW NEAR-TERM MILESTONES**

SITE	DRAFT DOCUMENT (D1) SUBMITTAL DATE	DRAFT FINAL (D2) DOCUMENT SUBMITTAL DATE	FY11	FY12	FY 13
3	30 March 2012	30 July 2012		LUC RACR Letter D-1 & 2	
5	1 November 2011	1 May 2012		RI Report D-1 & 2	
5	1 November 2012	1 May 2013			FS Report D-1 & 2
27 (with 9/16/55)	30 February 2013	30 September 2013			FS Report D-1 & 2
45	30 June 2011	30 December 2011	FS Report D-1	FS Report D-2	
45	30 January 2013	30 August 2013			Proposed Plan D-1 & 2

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**NEAR-TERM MILESTONES BASED ON EXTENSION REQUEST APPROVALS**

SITE	DRAFT DOCUMENT (D1) SUBMITTAL DATE	DRAFT FINAL (D2) DOCUMENT SUBMITTAL DATE	FY11	FY12	
3	30 May 2011	30 August 2011	Site 3 ROD D-1 & 2		
3	30 October 2011	1 December 2011		Site 3 LUC RD D-1 & 2	
5		30 November 2010	RI/FS Workplan D2		
27 (with 9/16/55)	30 November 2011	30 April 2012		Site 9/16/27/55 RI Report D-1 & 2	
45		30 December 2010	RI Addendum Report D2		

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<b>3</b>		30 September 2010			

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<b>27 (with 9/16/55)</b>	30 January 2013				FS Report
<b>45</b>	30 November 2011	30 April 2012		Site 9/16/27/55 RI Report	
<b>45</b>	30 January 2013				Proposed Plan

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**TABLE 2  
OUT-YEAR MILESTONES  
SITE MANAGEMENT PLAN  
MCRD PARRIS ISLAND**

	<b>DRAFT FINAL (D2) DOCUMENT SUBMITTAL DATE<sup>(1)</sup></b>	<b>FY14</b>	<b>FY15,</b>	<b><u>FY16 and Later</u></b>
<b>5</b>	1 May 2014	Proposed Plan		
<b>5</b>	1 May 2015		ROD	
<b>5</b>	1 May 2016			RAWP
<b>27 (with 9/16/55)</b>	30 January 2014	Proposed Plan		
<b>27 (with 9/16/55)</b>	30 January 2015		ROD	
<b>27 (with 9/16/55)</b>	30 January 2016			RAWP
<b>45</b>	30 August 2015		ROD	
<b>45</b>	30 August 2016			RAWP

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<b>27 (with 9/16/55)</b>	30 January 2013				

  

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<b>45</b>	30 August 2013				