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EMAIL REGARDING U S EPA REGION IV COMMENTS ON PROPOSED PLAN FOR SITE 3
CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC
11/9/2010
U S EPA REGION IV

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Subject: Re: Site 3 PP
Date: Tuesday, November 09, 2010 5:35:11 PM

Yes. Changes will be needed based on the Regional Decision Team (not to be confused with the National Remedy Review Board¹). That is why you have not seen my letter yet. Three issues were raised, however two do not impact the PP. One deficiency regarding adoption of the interim remedy as final was noted pertaining to demonstrating the proposed final remedy was evaluated against National Contingency Plan criteria for remedial alternatives and that the final remedy continues to satisfy the threshold criteria. [Reference 40 CFR 300.430(e)(9)(iii) and 430 (f)(1)(i) and (ii).] EPA will also be issuing a conditional approval letter (hopefully on Wednesday). The conditions will call for the Navy to add language to the PP to rectify this deficiency. The condition will suggest language similar to the 2000 PP developed in support of the IROD. Specifically, it will reference the description of the remedial alternatives on pages 6 and 7, and the summary of comparison to the NCP Criteria on pages 8 and 9.

None of this changes the post-IROD decisions the team has made. This is simply a requirement to add some factual statements to the PP regarding what took place as part of the original FS process for purposes of complying with the NCP and EPA Guidance.

Feel free to call me with questions. Otherwise, look for our letter on Wednesday.

Lila

¹ In summary, the Regional Decision Team (RDT) has its home in Region 4, and is comprised of Section Chiefs in the Superfund Division, as well as limited HQ representation. The purpose of the RDT is to review remedy decisions being made, prior to the ROD stage (usually at the FS, but like in our case, where there was no FS, the PP stage.) They are looking for consistency in decisions being made across the division, ensuring that the major components of a good decision have been addressed, and that the NCP, CERCLA, and EPA Guidance has been followed. Currently, ALL remedy decisions must pass through the RDT. On the other hand, the National Remedy Review Board (NRRB) was created in 1996 and has its home in EPA Headquarters. The NRRB has a specific policy in place to address which remedies must be reviewed by the Board. In general, if the proposed remedial action costs more than \$25 million dollars; or if certain changes are made after the proposed plan, the remedy must be reviewed by the NRRB.

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Date: 11/09/2010 02:30 PM

Subject: Site 3 PP

Hi team,

We just meet internally about the Site 3 PP and Tech Memo. We are working on our conditional concurrence letter for these documents. However, we wanted to find out the outcome of EPA's meeting with their Remedy Review Board before finalizing our comments. Will there be any changes to the Site 3 PP D2 based on this Review Board meeting?

Thanks,
Meredith