

M00263.AR.000922
MCRD PARRIS ISLAND
5090.3a

LETTER REGARDING U S EPA REGION IV CONDITIONAL APPROVAL OF DRAFT FINAL
SITE MANAGEMENT PLAN FOR FISCAL YEAR 2011 MCRD PARRIS ISLAND SC
12/15/2010
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Atlanta Federal Center

61 Forsyth Street, SW

Atlanta, Georgia 30303-8960

December 15, 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: Lisa Donohoe
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the FY11 Draft Final (D2) Site Management Plan (SMP) for the Marine Corps Recruit Depot (MCRD), Parris island, South Carolina (Submitted under cover letter of November 2010)

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) has completed its review of the FY11 Draft Final Site Management Plan for MCRD, Parris Island, South Carolina. The review has resulted in this conditional approval letter, which contains some final comments which do not require a response, and conditions which must be met in order for this approval to remain in effect and to avoid dispute. The Navy/MCRD has until January 7th, 2011, to respond to this conditional approval, providing the requested final change pages and/or negotiating revised acceptable final language, either one to be submitted via change page; or by disagreeing in writing with the conditions of this approval. EPA's comments and conditions are as follows:

Comments Not Requiring a Response:

1. Milestone dates which were previously approved via a written extension request can only be further extended via another written extension request. In the future, please ensure that all dates have been approved via written extension requests before including them as such in a Site Management Plan. Please see EPA's responses to Navy/MCRD requests for extensions in EPA letters dated November 22 and December 6, 2010. One of the extensions requested

by the Navy and included in the SMP as approved was not approved (Site 27/55/9/16 Draft RI Report (D1)). Therefore, this SMP cannot be approved without conditions (See below).

2. The condition below requires the Navy to modify the SMP in order to meet with EPA approval. In doing so, the Navy may only make minor changes (date of the revision in the header, page numbers in the Table of Contents, etc.) which do not otherwise change the intent of the document, or as specified in the comments below. Otherwise, the Navy should initiate dispute, as described in the condition below.
3. While EPA has reviewed information provided in Section 5, Site Description and FY11 Document Deliverables, the actual status of each site described is officially determined by individual official Site documents and associated correspondence. Likewise, were there to be discrepancies between the text and Table 1 of the SMP, the milestones in Table 1 preside.
4. The Navy did not provide an electronic copy of Table 2 in this most recent submittal. Therefore, EPA has not included one in the attached redline. However, the Navy is expected to include Table 2 in the Final SMP. Since Table 2 milestones are not enforceable, the Navy may make changes to Table 2 without voiding this conditional approval.

The MCRD FY09 SMP is approved provided the following condition is met:

Conditions for Approval:

1. EPA has attached to this letter a redline version of the FY11 SMP document. This document was created by accepting redlines previously provided by the Navy, then adding/deleting language as necessary to create a document which is approvable. This approach was discussed with and agreed to by the Navy, for simplicity. EPA understands the Navy will modify their SMP accordingly and submit a Final SMP document based on these redlines. This Final document should be submitted by January 7th, 2011 in order to retain this approval. If there are any changes the Navy/MCRD cannot agree to, the Navy should issue a letter initiating dispute by January 7th, 2011, and identify those changes over which the Navy is in dispute, in accordance with provisions of the MCRD Parris Island Federal Facilities Agreement (FFA).

EPA appreciates the coordination efforts put forth by the Base and Navy in developing a Site Management Plan as comprehensive as this one. If there are any questions, please do not hesitate to contact me at (404) 562-9969 about these comments and conditions.

Sincerely,



Lila Llamas
Senior RPM
Federal Facilities Branch
Superfund Division

Attached: EPA Redlines of SMP Text, Table 1, and Table 3.

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