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MCRD PARRIS ISLAND  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON THE DRAFT SITE  
MANAGEMENT PLAN FOR FISCAL YEAR 2014 MCRD PARRIS ISLAND SC  
9/11/2013  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

September 11, 2013

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Commanding Officer  
Naval Facilities Engineering Command Southeast  
Attn: Mr. Dan Owens (OPA6) Remedial Project Manager  
P.O. Box 30  
135 Ajax Street  
Building 135  
Naval Air Station, JAX  
Jacksonville, FL. 32212-0030

AND

Commanding General  
Marine Corps Recruit Depot  
Natural Resources & Environmental Affairs Office  
Attn: Mr. Tim Harrington  
PO Box 5028  
Parris Island, SC 29905-9001

Dear Mr. Owens and Mr. Harrington:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Fiscal Year 2014 (FY14) Marine Corps Recruit Depot (MCRD) Site Management Plan (SMP). EPA has reviewed the FY14 SMP in accordance with the MCRD Federal Facilities Agreement (FFA) and previous team agreements. From henceforth, the term Navy as used herein refers to both the Navy and MCRD as parties to the FFA.

The review has resulted in comments which need to be addressed in a revised Draft Final SMP. Because this SMP has been delayed due to disputes, EPA is already far along in the target setting process for FY14. EPA would appreciate if the Navy could submit a revised Draft Final SMP for approval by September 20, 2013. This would assist EPA in meeting its target setting needs by September 30, 2013.

For the Tables in the SMP, the Navy should follow the format previously utilized, including Table 1 - Near-Term Milestones (FY, FY+1, FY+2), Table 2 - Out Year Milestones (FY+3, FY+4, FY+5, etc.), and Table 3 - Update of FFA Appendix C (include MMRP Sites). Please remember to update each fiscal year milestones by incorporating sufficient time to allow for the review and response timeframes as negotiated in this SMP between each document milestone. Also, as agreed to by the team, please avoid milestones of multiple site documents within a short timeframe. This will allow time for the CERCLA process as described in CERCLA, the FFA, and the SMP (process steps, review times, response times,

etc.) between documents for the same site, and to help manage workload while making progress on multiple sites at the same time.

EPA looks forward to working with the Navy and MCRD. As you prepare the revised SMP please feel free to call with any questions. I can be reached at 404-562-9969.

Sincerely,



Lila Llamas

Senior RPM

Federal Facilities Branch

Superfund Division

cc: Meredith Amick, SCDHEC

Peggy Churchill, TtNus

David Warren, Ensafe

**EPA Comments on the Draft MCRD FY14 Site Management Plan Update**  
**Comments submitted September 11, 2013**

- 1) **Page 10, Table of review and response times – In the last column please indicate a footnote and add a footnote which reads “Due to budget cuts, workload issues, and logistical issues with internal review procedures, an automatic 20 day extension remains for any FS, PP, ROD or ROD Equivalent (e.g. ROD amendment, ESD, etc.) draft final document.” As discussed with the team before, this need is due to the need for attorney involvement in all three document types, Regional Decision Team review and approval of FS and/or PP, and attorney support during management briefings in preparation for ROD signatures. Sequestration and other funding issues has caused a decrease in hiring, making it even more difficult for fewer attorneys and managers (RDT) to cover all the site document needs.**
- 2) **Pages 16, 19, 20, and 25, Sites 9/16/27/55 – At the end of the Status section for each site, please add the following “EPA issued a conditional approval of the FS in early June 2013. The Navy invoked dispute of the conditional approval in late June, 2013. The Navy and EPA are working to document resolution of dispute issues. Work is expected to resume according to schedule.”**
- 3) **Page 24, Site 54 – At the end of the last paragraph of the status section please add the following “Review of the D2 was suspended by the Navy so that concerns raised by EPA regarding the need for PCB congener analysis could be discussed. At the conclusion of discussions, the Navy committed to document conclusion of the discussions and team consensus, and to submit change pages accordingly, at which time review of the D2 document will commence.”**
- 4) **Page 28, UXO 4a Rocket Range – EPA suspects the last sentence is referring to a safety risk. If this is the case, please add the word “safety” prior to the word “risk” for clarity. Otherwise, an RI for this site is not complete, no determination of environmental risk levels has been finalized, and the sentence should be deleted.**
- 5) **Page 28, UXO 8 Aerial Bombing Range – EPA suspects the first sentence is referring to a safety hazard. If this is the case, please add the word “safety” prior to the word “hazard” for clarity. Otherwise, an RI for this site is not complete, no determination of environmental risk levels has been finalized, and the sentence should be deleted.**

Also, at the end of the status section please add the following, “Additionally, EPA has raised concerns regarding the sediment sampling protocols and methods which will have to be resolved.”

- 6) **Table 1, Near Term Milestones (FY, FY+1, FY+2) – Please update this table with the milestones as presented via email in Table 1B dated 08 23 13 for FY14 milestones. Please add to the Table projected milestones for FY+1 and FY+2 corresponding to FY15 and FY16. Please ensure the table column titles are properly updated. Please remember to update each fiscal year’s milestones by incorporating sufficient time to allow for the review and response timeframes as negotiated in this SMP between each document milestone. Also, as agreed to by the team, please avoid milestones of multiple site documents within a short timeframe. This will allow time for the CERCLA process as described in CERCLA, the FFA, and the SMP (process steps, review times, response times, etc.) between documents for the same site, and to help manage workload while making progress on multiple sites at the same time.**

- 7) **Table 2, SHOULD BE Out-Year Milestones (FY+3, FY+4, FY+5, etc.) – Please add the table as indicated here and add to the table projected milestones for FY+3, FY+4, and FY+5, etc. corresponding to FY17, FY18, and FY19, etc. Please remember to update each fiscal year milestones by incorporating sufficient time to allow for the review and response timeframes as negotiated in this SMP between each document milestone. Also, as agreed to by the team, please avoid milestones of multiple site documents within a short timeframe. This will allow time for the CERCLA process as described in CERCLA, the FFA, and the SMP (process steps, review times, response times, etc.) between documents for the same site, and to help manage workload while making progress on multiple sites at the same time.**
  
- 8) **Table 3, Update of FFA Appendix C – Please add the MMRP Sites to Appendix C.**