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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON THE DRAFT FINAL SITE
MANAGEMENT PLAN FOR FISCAL YEAR 2013 MCRD PARRIS ISLAND SC
11/6/2012
U S EPA REGION IV



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

Nov 6, 2012

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: Ms. Lisa Donohoe
PO Box 5028
Parris Island, SC 29905-9001

Dear Mr. Owens and Ms. Donohoe:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Final Fiscal Year (FY) 2013 (13) Marine Corps Recruit Depot (MCRD) Site Management Plan (SMP). EPA has reviewed the FY13 SMP in accordance with the MCRD Federal Facilities Agreement (FFA) and previous team agreements.

EPA has found that the Site Description portion of the plan still needs clarification regarding the status of each site. EPA cannot approve this portion of the SMP. However, EPA understands the Navy has committed to revise this portion within the next couple of months as part of the process to brief the new Navy Remedial Project Manager. This will help ensure the SMP will be more easily updated for the FY14 SMP Amendment due in June 2013. EPA looks forward to the submission of the revised Site Description portion of the FY13 SMP.

Furthermore, Table 2 (should be Table 3) should be updated to include all sites now being addressed under CERCLA and the FFA (including MRP Sites). Also, each year the text portion of the SMP should be updated to identify and organize all sites by Operable Units (page 8) once they are determined to need a Remedial Investigation. And finally, a Table (should be Table 2) providing Out Year Targets

(FY+3, FY+4, FY+5, etc.) should be included. Please provide these updated Tables and text along with the Site Description update. Be sure to follow EPA's previous comments while making these updates.

Each year in amending the SMP the comments/guidance provided for this draft document in EPA's letter dated July 13, 2012 and the requirements specified in the FFA should be followed.

Based on the review, EPA approves the milestones on Table 1 (FY, FY+1, FY+2) as well as the review and comment periods listed on page 10 and should be considered enforceable in accordance with CERCLA and the FFA. However, prior to submitting the FY14 SMP Amendment, the milestone dates for FY+1 and FY+2 should be adjusted to avoid simultaneous submittal of multiple documents and spaced out sufficiently to allow time for the CERCLA process as described in CERCLA, the FFA, and the SMP (process steps, review times, response times, etc.).

EPA looks forward to working with the Navy to update the site description portion of the text, Tables 2 and 3, as well as identification of Operable Units for the SMP. 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