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MCRD PARRIS ISLAND
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT SITE 53
PRELIMINARY ASSESSMENT/SITE INSPECTION WORK PLAN MCRD PARRIS ISLAND SC
12/20/2000
U S EPA REGION IV

1D-172
01.01.00.0018

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Stephen A. Cheney
Commander
Marine Corps Recruiting Depot - Parris Island
P. O. Box 19001
Parris Island, SC 29906-9001

SUBJ: Draft Preliminary Assessment/Site Investigation Work Plan Site/SWMU 53
U.S. Marine Corps Recruit Depot Parris Island, South Carolina
EPA ID# SC6170022762

Dear General Cheney:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the above referenced document. EPA's comments are enclosed. If you have questions about these comments, please call me at (404)562-8506.

Sincerely,

Robert H. Pope
Federal Facilities Branch
Waste Management Division

cc: Tim Harrington, MCRD
Jerry Stamps, SCDHEC
Don Hargrove, SCDHEC
Art Sanford, NAVFAC

**EPA Comments on the Draft PA/SI Work Plan for Site/SWMU 53
MCRD Parris Island, SC**

General Comments:

1. An additional groundwater sampling location north of the dump area is needed to determine upgradient conditions and to allow for definition of a potentiometric surface. It is requested that a method more definitive than visual surveying, such as geophysics, be used to define disturbed areas potentially reflecting subsurface disposal. See specific comments.
2. The development and presentation of Data Quality Objectives (DQOs) and the project Quality Assurance Plan (QAP) is inadequate to meet EPA requirements. While the planned data acquisition would seem to correspond to the more evident data needs, the lack of specific DQO problem statements/decision needs makes this difficult to evaluate. Moreover, the quantity and quality of data proposed has not been substantiated. The specific QAP requirements also should reflect the established DQOs.

Specific Comments:

3. **Section 1.2, 1st sentence:** Sentence states that the work plan was developed using the data quality objective process. However, the DQO process is not reflected in the referenced Work Plan sections.
4. **Section 2.1, 2nd paragraph, 4th sentence:** This sentence states that additional material may be buried at the site. This concern is not addressed by the proposed work. It is requested that an EM-31 geophysical investigation be done to determine if buried waste is present.
5. **Section 2.1, 2nd paragraph, last sentence:** It is unclear that the proposed visual survey will identify all disturbed areas. Relying on visual surveys and aerial photographs alone is not adequate, particularly if subsurface disposal took place over 50 years ago.
6. **Section 3.2:** Based on the size of the site and the wide variety of material exposed at the surface, the proposed number of soil samples is inadequate to fully determine the presence or absence of hazardous wastes or their impact on the site media. At a minimum, 6 surface soil and 6 subsurface soil samples should be collected. Additionally, at least 1 background surface soil and subsurface soil should be collected.
7. **Section 3.2:** Since the location and extent of the site is not well established, the following steps are needed in the investigation prior to locating and collecting

groundwater samples: 1) a geophysical investigation to define the limits of waste; 2) UXO screening for all subsurface penetrations; 3) locating wells in closer proximity to the waste; and, 4) an upgradient groundwater sample should be collected.

8. **Section 3.2.1, 1st paragraph:** PCB and pesticide analysis must be included in the requirements for soil samples. These compounds were known to be used and disposed at MCRD, they are persistent in the environment, and have relatively low mobility. The Work Plan is not clear if these compounds are being included or excluded from the planned analyses.
9. **Figure 3-1:** Once the full extent of the waste is determined, downgradient wells should be moved closer to the waste and an upgradient well should be added.
10. **Section 5.2:** On what basis will the subsurface soil sample interval be selected? In the absence of elevated PID readings or other visual indications of contamination, it is recommended that subsurface soil samples be collected directly above the water table.
11. **Section 6:** This section, including the referenced information, does not meet EPA Quality Assurance Plan (QAP) requirements. A review of the Master QAP indicates that appropriate generic/sitewide content (e.g., audit and corrective action processes) is included, however, there remains significant project-specific content that is not presented in the project Work Plan.
12. **Section 8, 1st paragraph:** No "DQO statements" were made.