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MCRD PARRIS ISLAND
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON SITE
INSPECTION/CONFIRMATORY SAMPLING REPORT FOR SITES 4, 5, 7, 9, 13, 16, 27 AND
35 MCRD PARRIS ISLAND SC
10/25/2002
U S EPA REGION IV

October 25, 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Joseph J. McMenamain
Commander
Marine Corps Recruiting Depot - Parris Island
P. O. Box 19001
Parris Island, SC 29906-9001

SUBJ: Site Inspection/Confirmatory Sampling Report for Site/SWMU 4, Site/SWMU 5,
Site/SWMU 7, Site 9/SWMU 8, Site 13C/SWMU 13, Site/SWMU 16, SWMU 27, and
SWMU 35 (July, 2002)
Marine Corps Recruit Depot Parris Island, South Carolina
EPA ID#: SC6170022767

Dear General McMenamain:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the above referenced document. The document is adequate for its intent, however, there are issues regarding the path forward for some of the sites which need to be addressed. EPA's comments are enclosed.

If I can be of assistance in any way or you have questions regarding this issue, please call me at (404)562-8506.

Sincerely,

Robert H. Pope
Federal Facilities Branch
Waste Management Division

cc: Tim Harrington, MCRD
Dave Scaturo, SCDHEC
Don Hargrove, SCDHEC
Art Sanford, NAVFAC

EPA Comments on the Site Inspection/Confirmatory Sampling Report for Site/SWMU 4, Site/SWMU 5, Site/SWMU 7, Site 9/SWMU 8, Site 13C/SWMU 13, Site/SWMU 16, SWMU 27, and SWMU 35 (July, 2002)

**Marine Corps Recruit Depot
Parris Island, South Carolina**

General Comments:

1. The revised report generally incorporates the agreed responses to regulatory and stakeholder comments discussed during the December Partnering Team meeting, the December 16, 2001 teleconference, the February Partnering Team meeting, and the June Partnering Team meeting. However, a number of apparent inconsistencies that require clarification and potentially revision of this report have been identified. These pertain to the conclusions/recommendations and path forward for Site 9/16, Site 27 and Site 35, and are detailed in the specific comments below. It is requested that the Navy indicate in a formal correspondence, the final path forward for these sites. It is also requested that a teleconference among the Navy, regulatory agencies, and stakeholders be held in the near future to discuss these issues.

Specific Comments:

1. **Page 6-10, Section 6.7, 4th Paragraph.** Sites 9 and 16. Additional activities that are required to support closure of this unit include: preparation of a Focused Feasibility Study/Corrective Measures Study (no action and excavation alternatives); preparation of a Proposed Plan/Statement of Basis; and, preparation of a Record of Decision. In addition, complete delineation of soil contamination is needed. The Navy should clarify in the proposed path forward for this site whether the additional assessment activities will be documented in a Remedial Investigation/RCRA Facility Investigation report or in a design document, and whether the clean up activities will be pursued as an interim or final action.
2. **Page 8-7, Section 8.7, 2nd Paragraph.** SWMU 27. EPA concurs that excavation of impacted soils is likely to be the most effective approach to risk reduction and management for this site. However, a Focused Feasibility Study must be prepared to support the Proposed Plan/Statement of Basis for this decision. Clarify the proposed path forward for this site.
3. **Page 9-10, Section 9.7, 3rd Paragraph.** EPA does not concur with the Navy no action/no further action recommendation, at this time. Prior discussion indicated that capping or excavation would be used to control any potential risks identified at the site. While it is entirely appropriate to defer any final action until site closure, interim measures to control past or ongoing releases may also be necessary. Additionally, it is recommended the Navy consider using sediment run-off controls as a measure to manage risks and potential impacts to downstream ecological receptors. These types of controls can be a robust and inexpensive interim action to deploy pending closure of the site.