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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT REMEDIAL  
INVESTIGATION ADDENDUM WORK PLAN FOR SITE 45 DRY CLEANING FACILITY SPILL  
AREA MCRD PARRIS ISLAND SC  
10/25/2004  
U S EPA REGION IV



**United States Environmental Protection Agency**

Region 4  
Atlanta Federal Center  
61 Forsyth St. SW, Atlanta, GA 30303-8960  
October 25, 2004

4WD-FFB

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

Subject      **Draft Site/SMWU 45**  
                 **RI/RFI Addendum Work Plan**  
                 **Marine Corps Recruit Depot**  
                 **Parris Island, South Carolina**  
                 **EPA ID# SC6170022762**  
                 **August 2004**

Dear General McMenamin:

The United States Environmental Protection Agency (EPA) has completed its review of the subject document. The general technical approach presented in the Work Plan Addendum is adequate and should achieve the project objectives of defining the horizontal and vertical extent of groundwater contamination. Therefore, with a few minor caveats EPA approves the Work Plan for implementation.

**Specific Comments:**

1. **Page 2-1, Section 2.1.** Please include in this section the dates that Building 193 operated as the MWR Dry Cleaning facility. Additionally, if the capacities of the former AST and UST systems is known, please include that information in this section.
2. **Page 2-1, Section 2.1, 2<sup>nd</sup> Paragraph, 2<sup>nd</sup> Sentence.** The text states that the former underground storage tanks stored "hydrocarbon cleaning solvents". If the exact contents of the former UST system are known, please include that detail in the text. Additionally, the former UST system is not depicted in any figure. Please show the former location of the UST system and provide a text reference where appropriate.

3. **Page 2-2, 3<sup>rd</sup> Complete Paragraph**. Please discuss in this section if vertical head differences exist between the shallow surficial and deeper surficial aquifers.
4. **Page 2-6, Section 2.3.5, 2<sup>nd</sup> Paragraph, Last Sentence**. Please state in the text if the extraction recovery wells have been properly abandoned.
5. **Page 2-6, Section 2.3.6, 3<sup>rd</sup> Paragraph**. In the text clarify the difference between "on-site samples" and "off-site samples".
7. **Figure 3-1, Site Conceptual Model**. It is reported that the RI/RFI determined that there were no unacceptable risks to human health under residential, worker, or visitor use scenarios, however, figure 3-1 depicts soil contamination present under and surrounding building 193. Please clarify the risk text, or update the Site Conceptual Model as appropriate.
8. **Figures 6-1 and 6-2**. Please indicate in the figure if a well cap will be used in the well construction.
9. **Page 8-1, Section 8.0**. The text incorrectly reports that the site specific DQOs are provided in Section 4.0. Since the site specific DQOs have been presented across various portions of the work plan addendum, it is recommended that Figure 1-2, "Data Quality Objectives Process" which provides a crosswalk between specific DQO steps and the relevant report sections be referenced in this chapter.
10. **Figure 9-1**. Please update the figure to reflect the current USEPA RPM, SCDHEC RPM and Navy RPMs.

I apologize for the significant delay in providing this correspondence. If you have any questions, please contact me at (404) 562-8543.

Sincerely,

**Patricia J.  
Goldberg**

Patricia J. Goldberg  
Federal Facilities Branch

Digitally signed by Patricia J. Goldberg  
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cc: Tim Harrington, MCRD-PI  
David Scaturo, SCDHEC  
Don Hargrove, SCDHEC  
Art Sanford, NAVFAC