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MCRD PARRIS ISLAND  
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON REMEDIAL INVESTIGATION  
CONCEPT PAPERS FOR SITE 9, SITE 16, SITE 27 AND SITE 55 MCRD PARRIS ISLAND SC  
10/23/2006  
U S EPA REGION IV

**From:** [Koroma-Llamas.Lila@epamail.epa.gov](mailto:Koroma-Llamas.Lila@epamail.epa.gov)  
**To:** [art.sanford@navy.mil](mailto:art.sanford@navy.mil); [hargrodc@dhec.sc.gov](mailto:hargrodc@dhec.sc.gov); [koroma-llamas.lila@epamail.epa.gov](mailto:koroma-llamas.lila@epamail.epa.gov); [SladicM@ttnus.com](mailto:SladicM@ttnus.com); [stampsjm@dhec.sc.gov](mailto:stampsjm@dhec.sc.gov); [timothy.j.harrington@usmc.mil](mailto:timothy.j.harrington@usmc.mil); [mmcrae@TechLawInc.com](mailto:mmcrae@TechLawInc.com)  
**Subject:** Fw: MCRD sites 9, 16, 27 & 55  
**Date:** Monday, October 23, 2006 5:51:44 PM  
**Importance:** High

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Sorry this took so long!!!

We have the following comments regarding the RI Concept Papers:

- 1) Prior to the placement of the permanent wells and the next delineation field effort, the MCRD PI team should be allowed to review all data gathered from this first field effort and subsequent efforts. Additional groundwater and/or shallow soil sampling locations should be jointly determined by the team until delineation is complete and/or sufficient data exist to move forward to the next stage. Please make sure this commitment is clearly stated in the work plan.
- 2) To address potential data gaps in the groundwater flow direction and to aid in the siting of additional delineation wells and/or soil samples a complete round of well gauging in both existing permanent and proposed temporary groundwater monitoring wells should be completed before permanent monitoring well installation occurs.
- 3) In your work plan please discuss how sources will be identified during this iterative process. In EPA's experience, often the presence of pesticides and other contaminants in GW which are apparently unrelated to direct obvious sources (above ground storage areas, mixing areas, or reported spills, etc.) are likely attributable to underground pipes, drains, etc. So also please ensure that your work plan describes possible sources and relate these sources to how they are or are not to be investigated during this iterative process.
- 4) EPA understands the lack of additional soil samples in and around Sites 9 and 16 are due to an assumption that soils will be excavated and post excavation confirmatory sampling will be conducted to ensure clean-up goals are met. However, without some delineation it is not clear as to how alternatives will be analyzed, including costs, during the FS stage. I would assume you would limit the excavation to exposed soils between the building slab and the road on the East and South sides, but what about the North and West sides? Do we have anything to rule out those areas? EPA suggests the use of at least some field test kits to do some estimated preliminary delineation. See EPA's website for SW-846, 4000 series for pesticides, etc.
- 5) It is not clear if this assumption of excavation also applies to Bldg 401 and the FOV area, since no soil sample results were included herein. Please explain and consider as in #4 above.
- 6) For clarification: On the Sample Summary page the rationale and the analyte list appear to be incongruent. Where in places the rationale refers to this as a chlorobenzene and BTEX plume, the analytes are more inclusive. The results shown in Table 3-3 indicate more criteria were exceeded. Are you proposing to delineate only for chlorobenzene and BTEX or rather for any contaminant which exceeds a criteria? If this is to be limited, more discussion is needed.

7) Will background data be needed for either gw or soils? This concept paper does not seem to address any.

Please contact me with questions or comments.

Thanks,  
Lila