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MCRD PARRIS ISLAND
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EMAIL OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON PATH FORWARD FOR
SITE 27 EQUIPMENT PARADE DECK AREA DISCUSSED IN TEAM MEETING MCRD
PARRIS ISLAND SC
7/21/2009
U S EPA REGION IV

From: Llamas.Lila@epamail.epa.gov
To: [Sladic, Mark](#)
Subject: HERE IT IS AGAIN. Fw: ACTION ITEMS Parris Island Site 27 Pathforward & EE/CA rqt's
Date: Tuesday, July 21, 2009 11:31:54 AM
Attachments: [09 MCRD PI Site 27 path forward R1 - EPA Feedback.doc](#)

Hi Mark, You were addressed twice on this, but maybe you did not see it in the sea of emails coming back from vacation. Consider my action item done, again. ; -)

Lila

----- Forwarded by Lila Llamas/R4/USEPA/US on 07/21/2009 11:34 AM -----

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Subject
ACTION ITEMS Parris Island Site
27 Pathforward & EE/CA rqt's
(Document link: Lila Llamas)

Hi folks,

Not sure who all should get Site 27 stuff, so I used the email list for 45 (since it is gw) and my regular team list. Some of you may get this twice. If so, sorry.

Here is my comments on the Site 27 pathforward, which also includes requirements for public comment on the EE/CA. So that knocks out two action items.

Call me with questions.

Lila
404-562-9969

(See attached file: 09 MCRD PI Site 27 path forward R1 - EPA Feedback.doc)

MCRD Parris Island

Site 27

Proposed Path Forward

24 December 2008

To document my comment from the January 09 meeting: EPA instructed the Navy and Tetratex to follow CERCLA and the NCP. Appropriate documents have to be submitted at appropriate times. Decisions should be made at appropriate times in the process. Therefore these redlines simply adds detail to that instruction and attempts to put it in order. However, final decisions will be made at the appropriate time in the process.

	ACTION	RATIONALE
	<u>Create LNAPL CSM for decisions</u>	<u>Gets team on same page with respect to what is known to date about LNAPL and id's data gaps</u>
	<u>Scope delineation of LNAPL and data gaps from previous phases of investigation</u>	<u>To provide sufficient characterization for:</u> <u>1) an EE/CA. 2) an Action Memo, and 3) a subcontractor to propose the best approach to removal and develop a Removal Action Work Plan</u> <u>4) fill data gaps for remedial portion of clean-up and maybe some needed for VI assessment</u>
	<u>UFP SAP or regular RI SAP Addendum for Delineation</u>	<u>As determined to be necessary by the Navy or the PI team.</u>
	<u>Delineation Report</u>	<u>Short informal report to provide delineation data results.</u>
	<u>Scope LNAPL Removal</u>	<u>To get buy-in to Subs proposed approach to removal:-</u> <u>- i.d. LNAPL methods/approaches available</u> <u>- decide if soils removal to be included at this time.</u>
	<u>Develop EE/CA</u>	<u>Requirement for non-time critical removals</u> <u>- Compare alternatives</u> <u>- agree on proposed method/approach</u>
	<u>Public Notice/Public Comment</u>	<u>Not less than 30 days comment period</u> <u>SEE NOTES BELOW FOR PUBLIC INVOLVEMENT</u>
	<u>Develop Action Memo</u>	<u>Requirement for non-time critical removals –</u> <u>- document selected method/approach</u>
	<u>Address outstanding IDW issues.</u>	<u>Confirm that MCRD and contract hauler will be addressing the waste compliant with applicable regulations.</u>
	<u>Develop Removal Action Work Plan</u>	<u>Requirement for Removals</u>
4-	<u>Pump-out Remove LNAPL product.</u>	<u>Removal of the source material will prevent additional migration and will allow a better assessment of the impacts of the dissolved phase contamination.</u>
	<u>Removal Report</u>	<u>To document removal/treatment/disposal, compare with projections, recommend next steps, id needs for interim monitoring follow-up.</u>
	<u>Initiate a ground water monitoring program following LNAPL removal.</u>	<u>An apparent 'smear zone' exists on parts of the site at the groundwater interface. Once the LNAPL is removed, groundwater monitoring can be used to verify that the smear has exhausted its potential to leach to</u>

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		<u>groundwater, which would be evidenced by improving groundwater quality across the site. The Team may need to establish expectations for the speed of improvement of groundwater quality in order to assess the results.</u>
<u>This next group of items should either be moved up the list as appropriate if this is to be done as part of the original removal, or moved down to be part of the remedial action. Details are dependent on where this falls and will have to be addressed at that time.</u>		
2-	Better define MILCON building footprint, <u>including lay down area</u> , and then perform targeted soil sampling. An updated work plan, or work plan addendum, addressing review comments from the D2 WP will be necessary.	This will increase level of characterization of soils in the area that would become least accessible once the building is completed.
3-	Perform targeted soil excavations, using real-time measurements for verification.	Some soil contamination is surface or near-surface. <u>The decision to remove or not will be made at the appropriate point in time when sufficient data is available and Plans are submitted. Removal may include is should be removed</u> , using either immuno-assay tests or mobile laboratory for verification. Conventional fixed based laboratory samples might be needed for verification.
<u>Then continue on from here....</u>		
4-	<u>Address outstanding IDW issues.</u>	<u>Confirm that MCRD and contract hauler are addressing the waste compliant with applicable regulations.</u>
5-	<u>Initiate a ground water monitoring program following LNAPL removal.</u>	<u>An apparent 'smear zone' exists on parts of the site at the groundwater interface. Once the LNAPL is removed, groundwater monitoring can be used to verify that the smear has exhausted its potential to leach to groundwater, which would be evidenced by improving groundwater quality across the site. The Team may need to establish expectations for the speed of improvement of groundwater quality in order to assess the results.</u>
6-	An updated site conceptual model will be necessary, including HHRA and ERA receptors.. Confirm / verify that a confining unit exists at about 35 feet bgs, and that no groundwater contamination has migrated below this depth. This work is part of a high-level, detailed fate and transport analysis.	A better understanding of how site conditions impact contamination migration is necessary in order to support remedy evaluation. Receptors (if any) and impacts on them is not yet known. Groundwater contamination concentrations increase with depth at some locations. It may be necessary to test deeper water bearing zones to confirm that significant vertical migration has not occurred. The following may be considered in the CSM and fate and transport analysis: <ul style="list-style-type: none"> o Salt water intrusion o Preferential pathways for migration o Biological degradation potential o Evaporation potential o Impedance of pesticide migration due to soil matrix characteristics.
	<u>Complete the RI</u>	<u>Nature and extent after removal</u>

7.	Consider preliminary remedial alternatives, to include IM, source zone stabilization, MNA, others.	This MAY will provide preliminary confirmation that the MILCON can proceed without impacting the need for potential
	Complete the FS	
Continue on with remedial process from here.....		

NCP Requirements for EE/CA Public Participation:

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§ 300.415 40 CFR Ch. I (7-1-03 Edition)

(n) Community relations in removal actions.

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(1) In the case of all CERCLA removal actions taken pursuant to § 300.415 or CERCLA enforcement actions to compel removal response, a spokesperson shall be designated by the lead agency. The spokesperson shall inform the community of actions taken, respond to inquiries, and provide information concerning the release. All news releases or statements made by participating agencies shall be coordinated with the OSC/RPM. The spokesperson shall notify, at a minimum, immediately affected citizens, state and local officials, and, when appropriate, civil defense or emergency management agencies.

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(2) For CERCLA actions where, based on the site evaluation, the lead agency determines that a removal is appropriate, and that less than six months exists before on-site removal activity must begin, the lead agency shall:

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(i) Publish a notice of availability of the administrative record file established pursuant to § 300.820 in a major local newspaper of general circulation within 60 days of initiation of on-site removal activity;

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(ii) Provide a public comment period, as appropriate, of not less than 30 days from the time the administrative record file is made available for public inspection, pursuant to § 300.820(b)(2); and

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(iii) Prepare a written response to significant comments pursuant to § 300.820(b)(3).

(3) For CERCLA removal actions where on-site action is expected to extend beyond 120 days from the initiation of on-site removal activities, the lead agency shall by the end of the 120-day period:

(i) Conduct interviews with local officials, community residents, public interest groups, or other interested or affected parties, as appropriate, to solicit their concerns, information needs, and how or when citizens would like to be involved in the Superfund process;

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(ii) Prepare a formal community relations plan (CRP) based on the community interviews and other relevant information, specifying the community relations activities that the lead agency expects to undertake during the response; and

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(iii) Establish at least one local information repository at or near the location of the response action. The information repository should contain items made available for public information. Further, an administrative record file established pursuant to subpart I for all removal actions shall be available for public inspection in at least one of the repositories. The lead agency shall inform the public of the establishment of the information repository and provide notice of availability of the administrative record file for public review. All items in the repository shall be available for public inspection and copying.

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(4) Where, based on the site evaluation, the lead agency determines that a CERCLA removal action is appropriate and that a planning period of at least six months exists prior to initiation of the on-site removal activities, the lead agency shall at a minimum:

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(i) Comply with the requirements set forth in paragraphs (n)(3)(i), (ii), and (iii) of this section, prior to the completion of the EE/CA, or its equivalent, except that the information repository and the administrative record file will be established no later than when the EE/CA approval memorandum is signed;

(ii) Publish a notice of availability and brief description of the EE/CA in a major local newspaper of general circulation pursuant to § 300.820;

(iii) Provide a reasonable opportunity, not less than 30 calendar days, for submission of written and oral comments after completion of the EE/CA pursuant to § 300.820(a).

Upon timely request, the lead agency will extend the public comment period by a minimum of 15 days; and

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(iv) Prepare a written response to significant comments pursuant to § 300.820(a). [59 FR 47448, Sept. 15, 1994]

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