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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON THE DRAFT SAMPLING AND
ANALYSIS PLAN FOR SITE INSPECTION AT SITE 8A AND SITE 8B MCRD PARRIS ISLAND
SC
8/24/2012
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

August 24, 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Mr. Charles Cook
PO Box 30
North Ajax Street, Bldg 135
Jacksonville, FL 32212-0030

AND

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs Office
Attn: Ms. Lisa Donohoe
PO Box 5028
Parris Island, SC 29905-9001

Dear Mr. Cook and Ms. Donohoe:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Draft Sampling and Analysis Plan (aka. QAPP) Site Inspection for Sites 8A and 8B, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (May 2012). The resulting comments are attached. Please note that EPA has written the attached comments as general comments, in order to allow the Navy and MCRD the flexibility to revise the document accordingly in a timely manner without specific instructions. However, if the document is not revised in a sufficient manner given EPA's general comments, EPA reserves the right to provide specific comments as follow-up to the general comments. EPA has spoken with the Navy in the past regarding this approach to providing feedback on documents and the Navy has indicated this would be an acceptable approach to specify revisions needed to the document without generating numerous comments.

EPA expects a response to the attached comments and revisions to the document. EPA is available for consultation during this process if the Navy and/or MCRD are unsure what will

suffice as a response and revision for these general comments. Please feel free to call with any questions you may have regarding these comments. I can be reached at 404-562-9969.

Sincerely,

A handwritten signature in black ink that reads "Lila Lamas". The signature is written in a cursive style with a large initial "L".

Lila Lamas
Senior RPM
Federal Facilities Branch
Superfund Division

Attachment

cc: Meredith Amick, SCDHEC
Peggy Churchill, TtNus

**U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
TECHNICAL REVIEW OF THE
SITE INSPECTION FOR
SITE 8A and 8B
MAY 2012**

**MARINE CORPS RECRUIT DEPOT (MCRD)
PARRIS ISLAND, SOUTH CAROLINA**

GENERAL COMMENTS:

1. **Worksheet 3 and anywhere else applicable:** EPA has made repeated requests for the email address to be updated in various documents and in the contractor's master list, and yet, here the old email address has been used. EPA requests again, that this document, all other documents, and whatever master version from which these documents are produced is corrected so this comment does not prevent the Navy from getting approval without comment as is reportedly the Navy's goal. The correct email address is: llamas.lila@epa.gov
2. **Worksheet 6 - SAP Amendments, schedule changes, changes in scope or field work:** The Navy may not approve changes to the SAP without regulatory approval. Please modify all applicable communication pathway procedures to indicate regulatory approval is required for changes to the SAP. This should be considered in procedures for changes to contract scope, fieldwork, and schedules which deviate from that which is called for in the approved SAP. Additionally, the procedures for schedule changes should indicate that EPA requires that changes to field schedules allow for at least a two week notice.
3. **Worksheet 7 - Responsibilities Concerns:**
 - a. It is unclear what is meant by "evaluation", however, it is assumed as regulatory agencies SCDHEC and EPA would have similar responsibilities, therefore it would be appropriate to include "evaluation" in EPA's responsibilities as well. Otherwise, explain why not.
 - b. A Navy chemist is not listed. Please clarify if the SAP will be reviewed by a Navy chemist and if the Navy chemist review comments will be provided to EPA as previously requested and agreed to.
4. **Worksheet 10 - Concerns:**
 - a. Please clarify if there is any information to indicate which PCB Aroclor(s) may be present on site(s) based on what was known regarding oils used/contained in the leaking transformers. If the specific PCB Aroclor(s) is/are not known, please state so in the text.
 - b. Site 8B - Please clarify the amount of plastic, asphalt, and sand which was drummed and transferred off-site for disposal.
 - c. Site 8A and 8B - Please clarify the extent, depth, and location of any excavation and fill placed back on site after removals were complete.
 - d. Potential Receptors - In that MCRD was listed largely based on potential ecological impact it seems apparent that some eco receptors could use the site, for example small mammals (e.g. mice, chipmunks, etc.) and animals that prey on small mammals (e.g. snakes, birds of prey, etc.), and these could be impacted by persistent contaminants in the soil, etc. Please include eco as a potentially complete pathway in this section and throughout the work plan.
 - e. Figures 10-3 and 10-4 - Please revise the figures to indicate the extent, depth, and location of any fill placed on site.

5. **Worksheet 11 - Concerns:**

- a. **Problem Definition** – The definition should specify looking for the presence or absence of PCBs “above screening levels”. Furthermore, the following describes a suggested approach to investigating PCBs: According to Region 4 experts, the appropriate approach to investigating a PCB site is largely based on what is known about the site. For instance–
 - i. If it is known or strongly suspected that PCBs as Aroclors at ppm or ppb level are expected to be on site, then it may not be necessary to conduct congener analysis on the samples, and in fact, could cause problems at the lab. Detected presence of Aroclors at such levels would likely be sufficient to push this site into an RI without requiring congener analysis.
 - ii. If it is known or strongly suspected that PCBs as Aroclors at ppm or ppb levels are not expected at the site, then the presence of PCB congeners would need to be investigated in order to validate no presence at potentially unacceptable risk levels. Absence of Aroclors yet presence of PCB congeners could still indicate potential levels of concern. A complete congener analysis would have to be conducted to rule out the sites for concern. Analyzing only for Aroclors and WHO PCB congeners would not be sufficient.
 - iii. The use of field test kits may be useful in deciding if Aroclors may be present on site at ppm or ppb levels. The appropriate analysis could possibly be decided based on field test kit results.
 - iv. The bottom line is, complete PCB congener analysis is necessary to eliminate the sites from any further concern. However, sites could possibly move into an RI based on Aroclor analysis alone. Modify this worksheet and all other applicable worksheets appropriately to allow for these requirements.
- b. **Identify Information Inputs** – EPA understands that the background data set approved for use at MCRD does not contain any acceptable background levels for PCBs. Therefore, comparison to background would not be appropriate in this work plan. Please modify the work plan accordingly throughout.
- c. **Study Area Boundaries** – It is unclear if soils were replaced where previous removals took place. Please update the study area boundaries to address this concern. Clarify if the Navy intends to sample fill or not. There have been several instances of contaminated soils removed from sites with no explanation as to their disposition. If the Navy feels this fill may be contaminated, please indicate so and specify the analysis necessary to confirm or deny the possibility. Otherwise, please modify the boundaries and all sampling plan worksheets to clearly indicate investigation of fill versus original grade just below fill where materials were previously removed. Clearly relate sample intervals with respect to exposure scenarios being considered and therefore appropriate screening levels involved. Allow for tracking and incorporating samples accordingly so as to avoid confusion in the report resulting from this investigation.
- d. **Analytic Approach** – See above regarding bottom line analysis required.

6. **Worksheet 15 Concerns:** Update PALs as needed based on these other comments. Please include a Soil to Groundwater Screening value to help support a decision as to whether or not groundwater samples should be obtained. Include screening against these values as part of the decision points for determining if groundwater samples are needed.

7. **Worksheet 16 Concerns:** Schedule needs to be updated based on current status and planned status in final SMP (yet to be determined.)

8. **Worksheet 17 Concerns:** See above regarding study area boundaries. Also:
 - a. The text states 8A and 8B extent proceeds to 5 feet deep based on "current known extent". Please explain what is currently known about extent and to what depth removal took place. This could possibly be fill. If fill, explain analysis thereto. Explain the depth of fill and justify the sample intervals accordingly. If necessary, add samples to ensure a sample interval below the fill depth in order to sample original soils to determine if PCBs are present.
 - b. Please clarify how the samples are representative of a receptor's exposure and which sample intervals are relevant to which exposure scenarios, and therefore which screening values.
 - c. Please clarify if the samples on the outside edge of site 8B are on the pad or just off the pad. They should be just of the pad.
9. **Other worksheets:** Update other sampling and/or analytical worksheets in accordance with changes necessitated by responses to comments included herein.
10. **Navy Chemist:** Please provide a copy of the Navy Chemist review comments.

