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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON U S NAVY RESPONSES TO
COMMENTS ON THE CONDITIONAL APPROVAL OF THE DRAFT FINAL FEASIBILITY
STUDY, THE FEASIBILITY STUDY ADDENDUM AND THE DRAFT PROPOSED PLAN FOR
SITE 45 AND SITE 32 MCRD PARRIS ISLAND SC

1/28/2013

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

January 28, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Mr. Dan Owens
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. Owens and Ms. Donohoe:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the Draft Final Feasibility Study Addendum (FS Addendum) and the Draft Final Proposed Plan (PP) for Sites 45 - Former Morale, Welfare, and Recreation Dry Cleaning Facility and Site - 32 Laundry Satellite Accumulation Area (collectively "OU4") at the Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina, and the Navy and Marine Corps' responses to EPA's comments on these documents presented in EPA's letter dated October 31, 2012. The EPA finds that the Navy's responses to comments and revisions to the aforementioned documents (or in some cases the Navy's choice not to make the requested changes) have resulted in an FS Addendum and PP that the Agency cannot approve. Furthermore, this letter impacts the conditional approval of the Feasibility Study (FS) for OU4 as documented in EPA's letter of June 15, 2012, which required the uncontrolled migration of contaminated groundwater be addressed and remedial alternatives developed in an FS Addendum for review and approval, along with other specified requirements.

As will be further explained in a written response, the Navy has not, in some instances, adhered to EPA policy and guidance as provided under Section IV. PURPOSE, 4.2 and 4.4(b), and Section VIII. CONSULTATION WITH U.S. EPA AND THE STATE OF SOUTH CAROLINA of the MCRD Federal Facility Agreement (FFA). As a result, the Navy and EPA are in disagreement with respect to the evaluation of alternatives in the FS Addendum to address the uncontrolled migration of

contaminated groundwater, and selection of the preferred alternative to be presented in the PP. Furthermore, the Navy has made unsolicited text changes to the Remedial Action Objective (RAO) Number 4 that is inconsistent with EPA comments related to EPA policy on groundwater migration and that significantly impacts remedial action(s) necessary to meet the objective. The Navy has also made modifications to supplemental calculations effecting cleanup levels which now must be properly reflected in the PP, and has not fully addressed a variety of EPA comments in responses and/or associated text changes. Additionally, modifications are needed to the Land Use Control (LUC) language to clearly present the LUC objectives and the controls necessary to be fully protective of human health and the environment during remediation and into the future.

Finally, although the FFA parties agreed for the Navy to collect additional data on the uncontrolled migration of contaminated groundwater while moving forward with a PP, the Parties did not reach agreement on the criteria or standards that would be used to evaluate the contamination prior to remedy selection. In the meantime, EPA has agreed to allow the Navy to proceed with a PP which reflects the Navy's preferred alternative (GM-2) with EPA's preferred alternative (GM-4) as a contingency remedy provided the PP also states that the additional data gathered before finalization of the ROD could result in selection of GM-4. However, the Navy did not include language in the PP that accurately reflects EPA's position regarding the standards to be used as trigger levels which EPA clarified would be based on but not limited to established human health and environmental standards such as Maximum Contaminant Levels, surface water Ambient Water Quality Criteria, and sediment and ambient air criteria where available.

Accordingly, under Section VIII. Subsections 8.8. and 8.9 and Section IX. RESOLUTION OF DISPUTES of the FFA the EPA hereby non-concurs with the FS Addendum, and the PP for OU4. Non-concurrence automatically initiates the informal dispute resolution process under Sections VIII. and IX. of the FFA, and this letter serves as EPA's notice of same. The letter identifies the work that is affected and the nature of the dispute. A forthcoming reply to the Navy will provide further explanation of EPA's position with respect to the disputed Navy responses and revised documents. EPA believes that a majority of the concerns identified in this letter and the forthcoming reply to responses can be resolved informally within a 30 day timeframe. If you have any questions, please contact me at 404/562-9969.

Sincerely,



Lila Llamas, Senior RPM
Federal Facilities Branch
Superfund Division

cc: Meredith Amick, SCDHEC
Peggy Churchill, TtNus
Arthur Collins, US EPA
David Buxbaum, US EPA