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LETTER AND THE U S EPA REGION IV COMMENTS REGARDING THE DRAFT FINAL SITE  
INVESTIGATION REPORT FOR SITE 14 STORM WATER OUTFALLS MCRD PARRIS  
ISLAND SC  
07/10/2014  
U S EPA REGION IV ATLANTA GA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

July 10, 2014

**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: Mr. Tim Harrington  
PO Box 5028  
Parris Island, SC 29905-9001

Dear Mr. Owens and Mr. Harrington:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Draft Final Site Investigation (SI) Report for Site 14, Storm Water Outfalls, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (October 2012) Responses To Conditions (RTCs) for Approval and Change Pages submitted June 2014. The previous review revealed that while it appeared the report reflected what was discussed and agreed to as a pathforward for the outfalls, it was still not clear as to what exactly that was for each outfall, by media, specifying COPCs by media due to a few inconsistencies, and a need for some clarification, in Section 8, Table 8-1, and the RTCs. For that reason, EPA only approved this report with conditions that are listed in the previous conditional approval letter (September 13, 2013) which would correct Section 8, but not necessarily the rest of the document. Again, this review was focused on Section 8, Conclusions and Recommendations, without attempting to correct the remainder of the document or the responses to comments, such that work can proceed as necessary for those outfalls requiring additional investigation. EPA does not wish to see another revision of change pages for this document. The information that follows in this letter is sufficient to document EPA's understanding and expectation for the outfalls investigated in this SI.

The following is important to note regarding EPA's understanding of and expectation for outfalls (OF) investigated during the Site 14 SI:

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- 1) Results of the Site 14 investigation were/are to be used for the purpose of determining if additional investigation is warranted up-pipe and/or upgradient for each specific outfall, not to determine if FFA CERCLA Sites up pipe need investigating. ALL Sites listed in the FFA must be investigated.
- 2) All Outfalls being recommended for further investigation will be expected to be given an up-pipe investigation to determine if there is a specific source up-pipe entering the storm water system, or contamination surfacing from groundwater, regardless of what contamination may or may not be found during a PA/SI at CERCLA sites also located up-pipe. EPA understands for organizational/funding purposes the data at the outfall will be addressed during the associated CERCLA Site investigations. For example, contaminants at OF106 may or may not be associated with Sites 39 or 48 and the system pipes appear to drain a much greater area. Impacted similarly would be OFs 408/457, 567/592, 601/608DNF/636B.
- 3) It appears the Regional Screening Levels for PCBs were not properly converted from MG/KG to UG/KG. EPA expects COPCs to be carried forward as currently identified in Section 8, however, during development of the work plan for the up-pipe investigation and/or associated Site Investigation, the data may be rescreened and adjustments made as appropriate to COPC lists. EPA realizes PCBs at some outfalls may no longer be considered a COPC at that time; at other outfalls PCBs may be retained as COPCs. For the notes which follow, EPA assumes the current Section 8 recommendations as-is.
- 4) For OF 405, EPA expects the data to be considered with Sites 9/16/27/55, not only during LTM, but also in an up-pipe investigation as well as at the time the sediment downgradient of 9/16/27/55 is investigated, which may be prior to the Final ROD and development of LTM plans.
- 5) For OF 567 EPA will keep in mind that although no exceedances are noted, the Navy is recommending the outfall for further investigation due to its immediate proximity to OF 592.
- 6) For OF 881, EPA agrees that for purposes of Site 14 no further investigation is recommended at this time; however, with respect to the Site 45 investigation, the Storm Water Work Plan does not need to include sediment or surface water sampling to address ecological concerns at this time. However, at any point in the future if data from Site 45 indicates sediment and/or surface water samples should be checked to ensure no impact is occurring to the marsh, EPA reserves the right to require sampling. Otherwise, the Storm Water System investigation should proceed as planned during Team scoping sessions. EPA suggests the Navy revisit this issue in context of Site 45 to ensure the Team has a common understanding of how Eco concerns will/will not be addressed in the investigation (e.g. screening manhole water against Surface Water Ambient Water Quality Criteria?)
- 7) OF 305, originally an NPAO outfall, was excluded from the NPAO outfalls based on exceedances being considered outliers from the original NPAO data set. Therefore this outfall should have been included and addressed as a PAO outfall and recommended for further investigation. EPA will expect an up-pipe investigation of this outfall unless the Navy can justify otherwise at some point in the future.
- 8) For OFs with PAH exceedances, EPA will consider historical locations of base operations such as gas stations, other fuel stations/storage areas, etc., along with other CERCLA sites associated with the outfall. After an up-pipe investigation to rule out a potential specific source, EPA will consider evaluation of outfall data from outfalls that drain large parking lots relative to each other and screening levels before determining that any other investigation or action is necessary at the outfall.
- 9) Recommendations in Section 8.2 will not be considered in that they are inconsistent with the purpose of the investigation (See number 1 above and Section 11.4 of the SAP/QAPP August 2011.) All Sites listed in the FFA must be investigated.

10) EPA accepts the Navy's recommendations for further investigation at the Outfalls listed in Table 8-1 and adding OF 305, with the above understanding and expectations.

Again, EPA does not expect change pages or revisions to the document. The document was sufficient for its intended purpose. EPA looks forward to working with the Navy and MCRD in addressing the recommended further investigation and consideration of data from the Site 14 SI Report. Please feel free to call with any questions you may have. I can be reached at 404-562-9969.

Sincerely,



Lila Llamas  
Federal Facilities Branch  
Superfund Division

cc: Meredith Amick, SCDHEC  
Peggy Churchill, TtNus