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LETTER REGARDING 1 AND FEBRUARY 1990 VISUAL SITE INSPECTION OF SOLID
WASTE MANAGEMENT UNITS FOR RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY ASSESSMENT WITH ATTACHMENT MCRD PARRIS ISLAND SC
1/17/1990
U S EPA REGION IV

01.01.00.0007

JAN 17 1990

J. B. Hicks, Jr.
Colonel, USMC
Marine Corps Recruit Depot
Parris Island, SC

Reference: USMC Recruit Depot, Parris Island, South Carolina; EPA ID
No. SC6170022762; Visual Site Inspection Notification and
Agenda

Dear Col. Hicks:

This letter is to confirm that a visual site inspection (VSI) of the solid waste management units (SWMUs) and related areas of concern (AOCs) is to be conducted at the USMC Recruit Depot facility by representatives of our contractor, A.T. Kearney, Inc. The VSI has been scheduled for February 1 and 2, 1990, to completion. Your cooperation in admitting the contractor's representatives and assisting them while on site is appreciated. The contractor personnel may be accompanied by EPA Region IV and/or the South Carolina Health and Environmental Control (SCDHEC) staff.

Under the 1984 Hazardous Solid Waste Amendments (HSWA), a RCRA Facility Assessment is required at the USMC Recruit Depot. The assessment requires identification and a systematic review of all solid waste streams at the facility. The objective of this assessment is to determine whether releases of hazardous waste or hazardous constituents which require investigation have occurred or are occurring at the site. This analysis will provide a means by which to establish priorities for subsequent remedial investigations.

An integral part of this assessment is a VSI of your facility to verify the location of all SWMUs and determine their condition by visual observation. We are requiring that our personnel visit the facility for the purpose of a visual inspection of these SWMUs. During this site visit, no samples will be taken. Our representatives may require the assistance of some of your personnel in reviewing solid waste flow(s) or previous disposal practices. The purpose of this site visit is to provide EPA with a technical understanding of the present and past flows and handling, treatment, storage and disposal practices. Photographs of each SWMU are to be taken to document the condition of units at the facility and the waste management procedures used.

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In preparation for the VSI, the contractor is required to identify any potentially hazardous conditions that may be encountered during the VSI. The contractor will contact you prior to the VSI to obtain site-specific information pertaining to materials managed and levels of personal protection equipment required for entry to each area of the facility.

Enclosed is a proposed VSI Agenda which provides a list of potential SWMUs and a list of information gaps identified in the available file material. The information in the Agenda document will be reviewed with facility personnel prior to beginning the VSI. At that time the VSI schedule may also be adjusted to facilitate a complete inspection and evaluation of all past and present waste management practices and facility operations.

If you have any questions concerning the VSI, please contact the EPA Region IV Work Assignment Manager, Evelyn Ponton, who can be reached at 404/347-3433.

Sincerely yours,

James H. Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: A. Anderson, A.T. Kearney
J. Evans, A.T. Kearney/Centaur
A. Bakowski, SCDHEC, Columbia

4WD-RCRA: Ponton document ATKEARNEY STARKS

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ATTACHMENT

PROPOSED RCRA VISUAL SITE INSPECTION AGENDA

Facility: USMC Recruit Depot
EPA I.D. No. SC6170022762

Location: Parris Island, South Carolina

Facility Contact: Ms. Johnnie Nabors, 803/525-4754

Date(s) of Inspection: February 1 and 2, 1990, to completion

Inspection Team:

Annette Leseuer	A.T. Kearney	703/739-3754
Jeff Evans	Kearney/Centaur	703/547-4800
Evelyn Ponton	EPA Region IV	404/347-3433
Amy Bakowski*	SCDHEC	803/734-5200

* To be confirmed

OBJECTIVES OF VISUAL SITE INSPECTION:

The Hazardous and Solid Waste Amendments (HSWA) of 1984 broaden EPA's authority under RCRA to require corrective action for releases of hazardous wastes and solid wastes containing hazardous constituents at facilities that manage hazardous wastes. The corrective action authority extends to all solid waste management units (SWMUs) and other likely release areas at the facility. The first phase of the corrective action program, as established by EPA, is performance of a RCRA Facility Assessment (RFA). The steps in the RFA process include a preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility and, if necessary, a sampling visit (SV). A preliminary review of the file material has been performed for this facility, and a VSI has been deemed necessary. The purposes of the VSI are:

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1. To collect all available, relevant information on solid waste management practices that have been used on the site;
2. To gain first-hand information such as the identification, location, construction, configuration, function served, method of operation, release control provisions and condition of each SWMU;
3. To confirm, by visual inspection, information collected during the PR;
4. To survey the site for additional SWMUs and other areas of concern (AOCs) not identified in the review of file material;
5. To identify potential sample points for possible future sampling activities;
6. To review the site information and collect additional information to address the information needs identified during the PR; and
7. To take photographs of all SWMUs and other AOCs.

INSPECTION PLAN

EPA's contractor will send a two-member field team to perform a Visual Site Inspection. Due to the size of the facility and the tentative number of SWMUs and AOCs identified, a two-day inspection is anticipated. However, the team will be prepared to continue the inspection on the following day if necessary. The team will inspect all past and current solid waste and hazardous waste handling, storage, treatment and disposal areas on-site. Outdoor and indoor waste generation, collection and accumulation areas in production facilities will be inspected as necessary to acquire a complete understanding of waste streams, waste flows and waste handling procedures. The team will also identify, inspect and document potential pathways for release of hazardous constituents into the environment. Facility staff will be interviewed to develop a better understanding of past and current waste management practices. At this time, the facility is requested to provide any recent environmental monitoring or sampling data that may not be in the current EPA or State files. These data may include any soil characterization, geohydrologic data, air quality data or any other studies relevant to the environmental conditions at the site.

The overall rationale of this inspection is to enable the team to trace the waste flows through the entire facility, from the point of inception or generation, to ultimate disposal. The following schedule has been prepared based on the PR, and is intended as an outline for a thorough and efficient inspection of all SWMUs and AOCs on the site. Some adjustments to the proposed agenda may be necessary to accommodate facility staff, location of the units, operational constraints or unforeseen conditions. The proposed schedule will be reviewed during the introductory meeting and adjusted, if necessary, at that time. The VSI field team will make every reasonable effort to conform to the facility's normal hours of operation.

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A general schedule for the VSI has been developed based on the information gathered during the PR. Due to the field team's lack of information about exact SWMU locations, it is suggested that a facility map be made available during the introductory meeting so that an expeditious inspection schedule can be finalized between the inspection team and facility representatives. Also at the introductory meeting, the SWMU list and information needs will be reviewed with facility representatives to resolve any remaining issues or questions.

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PROPOSED VSI SCHEDULE

<u>Time</u>	<u>Activity</u>
<u>Day 1</u>	
8:00 - 8:30 a.m.	Introductory meeting with facility representatives. Discuss agenda, safety and health considerations and access to waste generation and management areas.
8:30 - 9:00 a.m.	Review facility history, including past and present waste streams and waste handling/disposal methods. Identify any SWMUs and AOCs not identified in the file review. Discuss information needs (see page 6).
9:00 - 12:00 p.m.	Begin facility inspection by viewing the SWMUs located in the vicinity of Page Field.
12:00 - 1:00 p.m.	Lunch break.
1:00 - 5:00 p.m.	Continue inspection by viewing the northwest section of the reservation including Horse Island and Jericho Island.
5:00 - 5:30 p.m.	Brief meeting to discuss to discuss the following day's schedule and any information needs.
<u>Day 2</u>	
8:00 - 12:00 p.m.	Continue inspection of the remaining IRP sites, shop waste generation areas, and waste solvent tanks.
12:00 - 1:00 p.m.	Lunch break.
1:00 - 5:00 p.m.	Continue inspection of waste generation areas.
5:00 - 5:30 p.m.	Conduct close-out meeting.

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TENTATIVE LIST OF SWMUs

1. IRP Site 1 Incinerator Landfill
2. IRP Site 2 Borrow Pit Landfill
3. IRP Site 3 Causeway Landfill
4. IRP Site 4 Dredge Spoils Area Fire Training Pit
5. IRP Site 5 Former Paint Shop Disposal Area
6. IRP Site 6 Hobby Shop
7. IRP Site 7 Page Field Training Pit
8. IRP Site 8 PCB Spill Area
9. IRP Site 9 Paint Waste Storage Area
10. IRP Site 10 Gas Spill Area
11. IRP Site 11 MCX Service Station Spill Area
12. IRP Site 12 Jericho Island Disposal Area
13. IRP Site 13 Inert Disposal Areas 1-3
14. IRP Site 14 Storm Sewer Outfalls 1-60
15. IRP Site 15 Dirt Roads 1 and 2
16. IRP Site 16 Pesticide Rinsate Disposal Area
17. IRP Site 17 Page Field Tanks (AS-16)
18. IRP Site 18 Page Field Tanks (AS-17)
19. IRP Site 19 MXC Service Station - Building 850
20. Halogenated Waste Solvent Tank
21. Non-Halogenated Waste Solvent Tank
22. Beryllium Dust Container
23. Asbestos Container
24. Former Incinerator Ash Disposal Areas

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TENTATIVE LIST OF SWMUs (cont'd)

25. Asbestos Burn Area - Near Drill Instructor Housing
26. Laundry Building Waste Sulfuric Acid Tank
27. Waste Sulfuric Acid Tank - Building 160
28. Waste Sodium Hydroxide Tank - Building 160
29. Sludge Disposal Site
30. Hanger 414 Staging Area
31. Rental Air Purifying System
33. Diesel Shop Oil/Water Separator
34. Motor Transport Oil/Water Separator
35. Salvage Yard
36. Transfer Station
37. Perchloroethylene Still Dry Cleaning Plant
38. Hazardous Waste Storage Shed - Building 895
39. Overflow Storage Pad - West end of Building 895
40. Waste Lubricant Underground Tank
41. Waste Hydraulic and Cutting Oil Underground Tank
42. Waste Wet Cell Electrolyte Basin
43. Paint Shop Satellite Accumulation Area (SAA)
44. Laundry Pretreatment SAA
45. Power Station SAA
46. PCB Capacitor and Transformer SAA
47. Welding Shop SAA
48. Air Conditioning/Refrigeration SAA
49. Dental Lab SAA
50. X-Ray SAA

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TENTATIVE LIST OF SWMUs (cont'd)

51. Photography Lab SAA
52. Medical Waste SAA
53. Building 700 SAA
54. Shop Stores SAA 1 - Building 626
55. Shop Stores SAA 2 - Building 627
56. Laundry SAA - Building 158
57. Machine Shop SAA - Building 864
58. Electronic Shop SAA - Building 864
59. Building 157 SAA
60. Photolab SAA - Building 283
61. Calgon Cold Tank SAA - Building 22
62. Tool Shed Lawn Mower SAA - Building 864
63. Paint Shop SAA - Building 864
64. Sulfuric Acid SAA - Building 864C
65. Building 865 SAA
66. Waste Naphtha SAA - Building 401
67. Equipment Parade Deck SAA
68. -Grease Traps

TENTATIVE LIST OF AOCS

- A. Fuel Storage Areas
- B. Mercury Spill Area - in the vicinity of the trickle filter

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ADDITIONAL INFORMATION NEEDS AND ITEMS FOR REVIEW DURING VSI

1. Provide an up-to-date facility map suitable for delineating the boundaries of the facility and for showing the location of all SWMUs and AOCs (2 copies).
2. Provide maps of the sanitary and storm sewer systems (2 copies).
3. Identify any additional SWMUs not listed in the tentative list of SWMUs such as Former Impact Ranges, Vehicle Washing Pads, Oil/Water Separators and other Shop Waste Accumulation Areas.
4. Describe waste minimization programs.
5. Provide a history of facility ownership, land use and waste management, particularly waste management practices prior to 1980.
6. Provide a list of additional Underground Storage Tanks (USTs), if any, at the facility.
7. Provide diagrams of the sewage treatment plant.
8. Provide details of past and present PCB removal operations.
9. Provide the most recent copies of Air and NPDES permits.
10. Provide copies of any aerial photographs that can be used to determine the Former Incinerator Ash Disposal Areas.
11. Provide details pertaining to any on-site remediation, groundwater monitoring, soil sampling or hydrogeology studies.
12. Describe past and present weapon cleaning procedures with respect to waste solvent disposal.
13. Describe current on-site fire training activities.

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