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MCRD PARRIS ISLAND
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON INTERIM REMEDIAL
DESIGN/CORRECTIVE MEASURES DESIGN AND INTERIM REMEDIAL ACTION WORK
PLAN FOR SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC

8/2/2000

U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

AUG 02 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Stephen A. Cheney
Commander
Marine Corps Recruiting Depot - Parris Island
P. O. Box 19001
Parris Island, SC 29906-9001

SUBJ: Interim Remedial Design/Corrective Measures Design (90% Review Package) and
Interim Remedial Action Work Plan Site/SWMU 3 Causeway Landfill
Marine Corps Recruit Depot Parris Island, South Carolina
EPA ID#: SC6170022767

Dear General Cheney:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the above referenced document. EPA's comments are enclosed. This Interim Remedial Design (IRD) package and Remedial Action Work Plan (RAWP) submittal is substantially more complete and responsive to EPA concerns than previous submittals. Following resolution of the relatively minor issues noted below, the IRD package and RAWP is conditionally approved for implementation. The conditional approval is dependent on finalization of the Site 3 Record of Decision and public acceptance of the remedy. If you have questions about these comments, please call me at (404)562-8506.

Sincerely,

Robert H. Pope
Federal Facilities Branch
Waste Management Division

cc: Tim Harrington, MCRD
Jerry Stamps, SCDHEC
Don Hargrove, SCDHEC
Art Sanford, NAVFAC

SAC:
FVI
PLS Return
to Pels S&L

Interim Remedial Design/Corrective Measures Design (90% Review Package)
Interim Remedial Action Work Plan
Site/SWMU 3 Causeway Landfill
U.S. Marine Corps Recruit Depot, South Carolina
EPA ID# SC6170022762

General Comment:

1. The Land Use Controls Implementation Plan (LUCIP) and Record of Decision should be finalized prior to initiating the Remedial Action (RA).

Specific Comments

1. **EPA Comments to Conceptual Design, Specific Comment 2, Response.** The LTM and O&M discussion presented in the RAWP addresses these topics (pages 3-9, 3-10), but additional detail will be required prior to approval of the LTM and O&M requirements for this action. The Technical Memorandum referenced on the first line of page 3-10 of the RAWP must be submitted to the regulatory agencies allowing sufficient time for review of the sampling details prior to the first sampling event. A finalized, detailed O&M plan will be expected during construction as mentioned in the response to Specific Comment 2 to the Conceptual Design.
2. **EPA Comments to Conceptual Design, Specific Comment 5, Response.** Management of landfill debris potentially encountered during construction is not adequately addressed in the technical specifications other than in the form of detail 43 of Drawing D-6. It is recommended that potential subcontractors performing earthwork also have access to the pertinent sections of the RAWP (sections 3 and 7)
3. **EPA Comments to Conceptual Design, Specific Comment 18, Response.** The response states that the detail desired in the original comment regarding earthfill material will be included in this Draft Design Submittal. The earthfill specification found in Section 02225, Part 2.1, still lacks much of the desired detail. **Additional detail especially regarding permeability of the proposed earthfill material is requested.**
4. **Detail 19 of Drawing D-4.** The bentonite plug may not be adequate as shown. It is recommended that additional bentonite (or other sealing material) be used, or an alternate method of sign emplacement be considered (e.g., concrete). There are also design and safety concerns regarding the placement of signs or utility poles into the waste materials (i.e., migration pathways and potential UXO materials). Please address these concerns as applicable.
5. **RAWP, Section 2.5, 2nd paragraph.** The word "misture" appears to be a misspelling of "mixture".

6. **RAWP, Section 3.11.2.3, 1st paragraph.** Verify that the proposed inspection schedule is in accordance with the requirements of the Site 3 LUCIP (to be developed). Normally, EPA Region 4 requires a quarterly inspection schedule, unless otherwise approved.
7. **RAWP, Section 5.0.** It is recommended that a fact sheet or informational flyer on the IRA be prepared and sent to the MCRD-PI mailing list. Also, the fact sheet should be kept on-site to provide to other interested members of the public, as needed. Also, the 2nd paragraph in this section should be revised as MCRD-PI does not hold "periodic meetings comprised of members of the local communities".
8. **RAWP, Section 6.1, page 6-1, last paragraph, 1st sentence.** The referenced quality control samples should be for soil analyses, as no groundwater or air samples are proposed in this SAP.
9. **RAWP, Table 6-2.** It should be noted that the proposed MS/MSD deviation limits for soil are broad, and that the completeness limit for a single sample should be set at 100%.
10. **RAWP, Appendix A.** The Basewide Work Plan is approved for use on this project with the exceptions noted below. This approval will be subject to review for future projects at MCRD based on the specific requirements and scope of the projects to be performed.
11. **RAWP, Appendix A, section 1.0, page 1-1, 2nd paragraph, last sentence.** Is it anticipated that a CTO-specific work plan addenda will be developed for this project? This additional plan is referenced throughout this appendix, and, while much of the project specific information is contained in the body of the RAWP, there appears to be some information that is not present (e.g., types and procedures for measuring and test equipment). This may be due to its inapplicability to this project. Please clarify.
12. **RAWP, Appendix A, Appendix A, section 2.0.** It is noted that floating turbidity barriers are not included as a structural practice in this Erosion and Sediment Control Plan. The inclusion of this method in the RD design package satisfies the project requirements. Please clarify this apparent inconsistency.
13. **RAWP, Appendix C.** Gregory Murphy's resume is duplicated in the appendix.