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MCRD PARRIS ISLAND
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EMAIL OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT LONG TERM
MONITORING WORK PLAN FOR SITE 1 INCINERATOR LANDFILL MCRD PARRIS ISLAND
SC
7/1/2004
U S EPA REGION IV

Sladic, Mark

From: Goldberg.Patricia@epamail.epa.gov
Sent: Thursday, July 01, 2004 11:23 AM
To: Sladic, Mark
Cc: Sanford, Art F CIV EFDSOUTH; Diane Duncan (E-mail); Stacey French; Don Hargrove; mac mcræ; Pope. Robert@epamail.epa.gov (E-mail); Debra Kraemer (E-mail); David M. Scaturro (E-mail); Jones, Theresa A AA ESBL; tim harrington (email); Tom Dillon (E-mail); Priscilla Wendt
Subject: RE: LTM WK PLN SWMU 1- EPA comments



Draft Site_SWMU 1
LTM WPEPACOM...

Mark, Tim, Art & all:

Here are EPA's formal comments on the SWMU 1 LTM WK PLN. Mac submitted them earlier this month while I was away. Apologize for the delay.

Shouldn't be any surprises, as they are consistent w/previous conf call, email discussions..please call if we need to discuss.. regards, pg

(See attached file: Draft Site_SWMU 1 LTM WPEPACOM072004.pdf)

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404.562.8543



United States Environmental Protection Agency

Region 4
Atlanta Federal Center
61 Forsyth St. SW, Atlanta, GA 30303-8960
July 1, 2004

4WD-FFB

Brigadier General Joseph J. McMenam
Commander
Marine Corps Recruiting Depot - Parris Island
P.O. Box 19001
Parris Island, SC 29906-9001

Subject **Draft Site/SWMU 1 Incinerator Landfill
Long Term Monitoring Work Plan
Marine Corps Recruit Depot (MCRD)
Parris Island, South Carolina
EPA ID# SC6170022762
May 2004**

Dear General McMenam:

The United States Environmental Protection Agency (EPA) has completed its review of the subject document and offers the following comments and suggestions.

General Comments:

1. The estimated time frame for achieving the defined success criteria recommended for marsh restoration is not clearly presented in the LTM work plan. As result, the time requirement triggering the implementation of the Saltwater Marsh Contingency Plan is also unclear. The frequency of native grass marsh monitoring presented in the LTM work plan differs from what was presented in the Final RA/CA Work Plan. The LTM work plan reports that plots of marsh grass will be inventoried annually. However, the Final RA/CA Work Plan reports that a "qualitative" evaluation would occur annually and a "quantitative" evaluation of the condition of the landfill marsh would be conducted three years after the completion of the restoration and to be compared to the success criteria.. Section 14.6 of the Final RA/CA Work Plan states that should the restoration area not meet the percent survival of stems per square meter requirements at the end of the three year monitoring period, the Saltwater Marsh Contingency Plan will be implemented. Please clarify in the final work plan the estimated time to achieve

the stem density success criteria and at what point will contingency measures be implemented. Additionally, please include a discussion of whether any short term (i.e., 1-yr, 2-yr, etc.) success criteria will be established.

Specific Comments:

1. **Page 3-1, Next to Last Paragraph.** See General Comment No. 1, above.
2. **Page 4-3, 1st Bullet Item.** The bullet reports that three plots of marsh grass along each of four transects should be inventoried (twelve total). However, only three transects with three plots per transect (nine total) were inventoried to establish the current reference stem density success criteria. Please discuss.
3. **Page 4-4, Table.** The table incorrectly reports that a 5-ft screen will be used to construct monitoring well PAI-01-MW-24, located upgradient and south of the capped landfill. The correct screen length for this well is 10-ft. Please correct the table.
4. **Page 4-5, Section 4.3.3, 2nd Sentence.** The text reports that four transects with three plots each will be selected. See Specific Comment No. 2, above.
5. **Page 4-5, Section 4.3.3, 6th Sentence.** Clarify in the text if both dead and alive stems of native grass will be counted within the one-meter square frame.

I look forward to incorporation of these comments into a revised LTM Work Plan. If you have any questions, please contact me at (404) 562-8543.

Sincerely,

Patricia J. Goldberg Digitally signed by Patricia J. Goldberg
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US,
Date: 2004.07.01 10:50:21 -04'00'

Patricia J. Goldberg
Federal Facilities Branch

cc: Tim Harrington, MCRD-PI
David Scaturo, SCDHEC
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