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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON PROJECT COMPLETION
REPORT FOR INTERIM REMEDIAL ACTIONS FOR SITE 3, SITE 35, SITE 53 AND SITE 54
MCRD PARRIS ISLAND SC
6/1/2005
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960

June 01, 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

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

SUBJ: EPA Review of Parris Island MCRD Project Completion Report for Interim Remedial Actions For
Various Sites 3, 35,53,54

Dear General McMenamin:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document. Please note that the document is Titled incorrectly. It is EPA's understanding that these were not actions taken as CERCLA remedial actions. EPA offers the following comments:

General Comments:

1. As reported, laboratory analysis of soil samples collected at SWMU 35, SWMU 53 and SWMU 54 showed elevated contaminant levels in exceedance of ecological screening criteria. Potential impacts to the environment may have occurred as a result of previous operational, handling and/or storage practices, particularly at SWMU 35 and SWMU 54. The Navy should present a path forward for resolution of the following issues and concerns:

Contaminant exceedances of ecological screening criteria at SWMU 35 include metals, PCBs and pesticides and confirms the results of previous soil investigations. SWMU 35 is the site where scrap metal, batteries, transformers and pesticides were formally stored.

The least number of contaminant exceedances were measured at SWMU 53, the

former asphalt plant area. Concentrations of metals, PCBs and pesticides exceeded ecological screening criteria in two soil samples. An unknown amount of asphalt rubble remains at SWMU 53.

The most number of contaminant exceedances were measured at SWMU 54, and include metals, PAHs, PCBs and pesticides. The laboratory results of previous sediment sampling conducted by EPA in the marsh area immediately north of SWMU 54 also detected concentrations of metals, pesticides and PAHs in exceedance of ecological screening criteria. Previous sampling and analysis of standing liquid and sludge/sediment samples collected from the north chamber of the concrete vault detected metals and PAHs at concentrations greater than Region 9 PRGs. SWMU 54, the old wastewater treatment plant site, is also the site where used oil drums were discovered intact inside the concrete vault during an earlier demolition activity.

2. In general, the groundwater results are not clearly presented in the report. Also, it is not clearly presented in the text how the temporary wells were installed or how they were sampled. The COC and/or the laboratory results for pesticides, SVOC and VOC analysis of groundwater samples collected from temporary wells at SWMU 54 could not be located in Appendix A as reported. Also, it is not clear in the text if the installation of the temporary groundwater wells was approved by SCDHEC. EPA may have additional comments after the groundwater information and results are more clearly reported.
3. Remove all reference to the word "remedial" (e.g., report title, report header). The activities conducted at the multiple units, particularly SWMU 35, SWMU 53 and SWMU 54 were not conducted as part of a CERCLA remedial action.

Specific Comments:

1. **Page 2, 1st Incomplete Paragraph.** The depth of the excavation and the depth at which the soil samples were collected should be reported in this section.
2. **Page 2, Section, 3rd Complete Paragraph & Figure 4.** The three temporary wells depicted in the referenced Figure 4 are located on the east side of the former tank location and are co-linear in their relative orientation. It is currently unclear how these locations were determined. A better configuration would have been to locate the wells in a triangular pattern around the concrete tank. The monitoring data would have provided a better understanding of the tidally influenced flow direction and contaminant distribution in the shallow groundwater aquifer. Additionally, Table 3 depicted in the figure should be titled SWMU 53 and not SWMU 35.
3. **Page 4, Section 3.1, Last Sentence.** Contrary to the statement, drinking water MCLs can be used as screening criteria for groundwater contamination.

4. **Page 5, Section 4.2, 2nd Paragraph.** The text states that “the tank composite water sample and the groundwater sampling which occurred following temporary well installation at the backfilled tank location showed minor detections of barium, iron, magnesium, sulfate and chloride where all organic compounds were undetected (SVO, VOA, Pesticides, and PCBs)”. While this statement is true for the laboratory results of the waste profile composite water sample, as reported in Appendix A, metal results of groundwater samples collected from temporary wells measured dissolved lead and chromium concentrations above the action level of 0.015 mg/l and MCL of 0.1 mg/l, respectively. Since the results of pesticide, SVOC and VOC analysis could not be located in Appendix A of the reviewed report, the statement that these constituents were not detected in the groundwater samples collected at SWMU 54 can not be supported (see General Comment No. 2, above).

If there are any questions regarding these comments, I can be reached at 404-562-9969.

Sincerely,

Lila Llamas, Senior RPM
Federal Facilities Branch
Waste Management Division

cc: Tim Harrington, MCRD
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