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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON SITE 3 CAUSEWAY LANDFILL
BIKE PATH EXPANSION NOTIFICATION MCRD PARRIS ISLAND SC
8/15/2005
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

August 15, 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Colonel J. R. Wingard, USMC
Marine Corps Recruit Depot
NREAO
PO BOX 5028
Parris Island, SC 29905-0028

Subject: Site/SWMU 3 Causeway Bike Path Expansion Notification

Dear Colonel Wingard,

The U.S. Environmental Protection Agency (EPA) received the above referenced notification on July 21, 2005. EPA has reviewed the provided materials in accordance with the Site 3 Interim ROD and Completion Report. Based on this review, EPA has determined that additional information is needed before concurrence can be provided. EPA supports the comments provided by the South Carolina Department of Health Environmental Control (DHEC) on August 3rd, 2005. Please consider the following additional comments and answer any questions included therein:

Comments:

- 1) The one page letter and enclosed drawings was insufficient to verify that project plans were established in such a way that the soil cover will not be compromised and exposures will not occur. For instance, there is little or no mention of the level of wastes in relation to depths of excavation. In some areas of the SWMU, only a 1 foot cover was required, however it is stated that proposed excavation may proceed to a depth of 18 inches. Please provide a brief narrative explanation to accompany the drawings. This brief narrative should address depth of excavation .vs. depth of soil cover in both the one foot soil cover areas and the two foot soil cover areas, and do this for each type of excavation planned (i.e. digging/grading, removing/installing signs, removing/installing trees, etc.) Also, please add cross sectional drawings which indicate the level of wastes compared to depth of excavation in both the one foot cover areas and the two foot cover areas.
- 2) Please provide portions of project plans which verify that personnel are made aware of the Land Use Controls and levels where wastes would be encountered. Once the Statement of Work

(SOW) is drafted and before contracting, please provide copies of pertinent sections which show contractors are being made aware of the same.

3) There is no discussion of Level D Personal Protective Equipment (e.g. long sleeve shirt, gloves, and tyvek coveralls and boot covers, if the potential exists for soiling work attire). There is no mention of the use of continuous air monitoring to determine if upgrades to level C or B may be required. Without more specific details about depth of cover .vs. depth of excavation, it cannot be determined the degree to which these requirements must be implemented, if at all.

4) Please describe how the workers will ensure that no excavation will exceed 18 inches, or to the point where wastes are encountered, when using heavy duty equipment.

5) The drawings mention that "unsatisfactory materials" may be removed. Please explain, and describe how this will stay within the projected 18 inches if not yet determined.

6) Drawings indicate that power lines are 2.1 feet below existing grade. Will any of these need to be excavated? Also utility lines?

7) What is silt fencing (limit of construction)? What is pipe bollard installation?

8) Various specific items are mentioned on the drawings, which do not necessarily seem to limit themselves to only 18 inches of excavation. Please clarify the depth of excavation for the following:

- a) sign posts (removal and installation)
- b) palmetto trees (removal and planting)
- c) valve box (below grade?)

9) Add waste levels to the cross sectional drawings. What is the actual scale for drawing box P?

10) Commit to providing EPA at least 72 hours notice prior to initiation of actual field work.

If you have any questions about these comments, please feel free to contact me at 404-562-9969. Please do not proceed with excavation activities without final approval.

Sincerely,

Lila Llamas, Senior RPM
Federal Facilities Branch
Waste Management Division

cc: Tim Harrington, MCRD
Art Sanford, NAVFAC
Stacey French, SCDHEC
Don Hargrove, SCDHEC