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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV CONDITIONAL APPROVAL OF DEMOLITION OF
BUILDING 200 NEAR SITE 45 DRY CLEANING FACILITY SPILL AREA MCRD PARRIS
ISLAND SC
12/17/2007
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

December 17, 2007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Charles Cook
PO Box 30
North Ajax Street, Bldg 135
Jacksonville, FL 32212-0030

And

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs
Attn: Heber Pittman
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the Request for Review and Comment on plans to Demolish Building 200, Temporary Lodging Facility (Pittman, December 3, 2007).

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced request. EPA herein offers a partial approval for the conceptual design for demolition of Temporary Lodging Facility, Building 200, on OU4 (Site 45) with conditions and comments. This approval should allow the Navy/MCRD to move forward with planning and contracting the work in part, however, please note the conditions requiring final approval via Sampling and Analysis/Waste Characterization and Disposal Plans, as well as review of Health and Safety Plans, prior to implementation and work beginning in the field.

The Navy/MCRD appears to have made some very conservative assumptions. The groundwater at Site 45 is very shallow. However, samples from nearby wells have shown non-detects or very low level contamination in the upper surficial aquifer for many contaminants. There is a possibility that some contamination may have passed the storm sewer drain and reached underneath the facility undetected. In fact, the DCE contaminants appear to have already passed the drain lines in very low levels as indicated in the most recent USGS data. Additionally, The RI showed there is a slightly higher level of

contamination in the lower surficial aquifer immediately underneath the building, however, the same location tested as insignificant in the surficial groundwater.

EPA does not believe there would be any Site 45 related surface contamination in the demolition area.

Based on these assumptions, EPA offers the following:

Conditions:

1. In doing demolition work, many requirements may apply, including environmental statutes and regulations other than RCRA and CERCLA (e.g. for asbestos, PCBs, construction landfills, etc.), as well as other worker protection regulations (e.g. OSHA, etc.) For instance, the transformer being removed must be confirmed as non-PCB, or otherwise disposed of in accordance with TSCA PCB disposal requirements, and the age of the building indicates the potential for asbestos containing insulation/construction materials. The presence of either of these materials in turn drives specific safety and training requirements as well. This review is not intended to provide a comprehensive review of this proposal. This review is focused on impacts associated with Site 45 CERCLA requirements. However, MCRD and the Navy must also comply with all applicable regulatory requirements associated with demolition activities in general.
2. In the letter, MCRD states that "The concrete slab, sub-slab vapors and soil gases, building materials and underlying soils may contain hazardous levels of toxic materials. Testing for worker safety and waste characterization is required and the contractor doing this work will be required to provide a work plan that addresses these issues."

The Navy/MCRD should submit a Sampling and Analysis/Waste Characterization and Disposal Plan pertaining to Site 45 contaminants only. This work plan must be submitted to EPA and SC DHEC for review and approval prior to implementation. Please ensure that the contractor separates work plan details for those items which address or are driven by RCRA/CERCLA requirements and are associated with Site 45 contaminants for ease of review. EPA would actually prefer a separate work plan in general, or at least a separate section within the work plan.

Also, please submit the Health and Safety Plan to be developed by the contractor, showing requirements as they pertain to Site 45 contaminants and worker safety. Please submit this work plan to EPA and SC DHEC for review prior to implementation. Please ask that the contractor separate plan details for those items which address or are driven by RCRA/CERCLA requirements and are associated with Site 45 contaminants for ease of review. EPA would actually prefer a separate work plan in general, or at least a separate section within the plan.

3. The duplex sanitary pump station and vault are to remain in place, but may be capped at the point of juncture coming from the facility.

It has not yet been clearly stated as to the potential impact that removal of the station and vault, as well as depressurization and capping of pipes and drains, may have on migration of plume contaminants. In the letter there is no legible description of the depth of this

structure, etc. Furthermore, the Navy/MCRD should clarify if these pipes and drains are taken off-line, whether or not there is a potential for this to become a preferential pathway, allowing the ground water plume to migrate into these lines as they have in other portions of the site. Also, please state whether or not there is a possibility contaminants may have already infiltrated the lines, and even the pump station and/or vault. These findings should be clarified. At that point, the Navy/MCRD may choose to either submit, as an addendum to this request, an explanation of the findings and what actions are or are not necessary during demolition. Otherwise, if the finding is that contamination of these structures is possible, the demolition of the structures may be handled as part of the Site 45 remediation activities and should be added to the Site description in the SMP and considered during remedy selection/design.

4. Existing groundwater monitoring wells are to remain in place, protected and undisturbed.
5. Any demolished materials should be removed from the site. No demolished materials are to be left and/or buried on site. The only building materials remaining on site should be those subsurface portions of the structure which remain intact after slab and wall removal (e.g. grade beam and wood piles.)
6. The area will be backfilled with clean fill material from offsite, and an erosion control ground cover added.
7. A Post-Demolition Report will be submitted to EPA and SC DHEC, showing analytical results, waste disposal disposition and amounts, costs associated with waste disposal, and a precise detailed drawing of subsurface structures remaining in place.

Comments:

8. Granted, EPA has stated concerns with respect to vapor intrusion in this occupied building, and has stated a prohibition against modeling for purposes of assessing indoor air contaminant levels. However, the Navy/MCRD may wish to use the J & E model and existing groundwater concentrations to back calculate levels of concern with respect to a short-term demolition risk scenario.

EPA appreciates the coordination efforts put forth by the Base and looks forward to working with you through this process. Please do not hesitate to contact me at (404) 562-9969 about these conditions and comments. Again, EPA appreciates the effort made on this document.

Sincerely,



Lila Llamas
Senior RPM

cc: Meredith Amick, SCDHEC
Sommer Barker, SCDHEC
Mark Sladic, TtNUS ✓