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MCRD PARRIS ISLAND  
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LETTER REGARDING U S EPA REGION IV CONDITIONAL APPROVAL OF DRAFT FINAL  
REMEDIAL INVESTIGATION WORK PLAN FOR SITE 9, SITE 16, SITE 27 AND SITE 55  
MCRD PARRIS ISLAND SC  
12/19/2007  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 4**

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

December 19, 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

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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 Draft Final (D2) Remedial Investigation Work Plan (RIWP) for Sites 9, 16, 27, and 55, Marine Corps Recruit Depot Parris Island, South Carolina. (September 2007)

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document in accordance with the Federal Facilities Agreement (FFA) for the Site. This document was initially submitted without a Navy/MCRD cover letter as official transmittal. This time, this submittal will be considered sufficient for purposes of meeting document milestones. However, all future submittals must be submitted with an official Navy/MCRD cover letter, even if submitted electronically via e-mail.

While a majority of EPA's comments were sufficiently addressed and incorporated, a few necessary items were not. EPA offers this Conditional Approval as a means for moving forward without dispute. Please ensure that the conditions are met within 4 weeks of receipt of this Conditional Approval letter in order for this approval to remain valid. The Site 9, 16, 27, and 55 RIWP is approved based on the following conditions being met:

Conditions for approval:

1. This RIWP is intended to meet the requirements for an RIWP for all four sites discussed within, being Sites 9, 16, 27, and 55. Therefore, the Navy should submit a new document cover and side binding which reflects this intention in the Title, as requested previously by EPA.

2. EPA submitted a redline version of the Response To Comments (RTC) to be included with the document in order to reach agreement and properly document that agreement. A copy of EPA's and the State's comments and the Navy/MCRD's response to comments should have been included in the Draft Final document. The revised RTC was not provided. Some of the responses to comments were critical in capturing agreements which were perhaps not clearly captured in the text of the document. Attached you will find a copy of the revised RTC which EPA would approve and accept as documentation of our agreements. Please include a set of both the EPA and State comments in the administrative record. Also include the attached version of the RTC **and notify EPA when this has been accomplished.** If the Navy/MCRD disagrees with any of the revisions made to the RTC, or requires additional changes for clarification, these should be submitted for approval and reconciled within the 4 weeks allowed for meeting these conditions.
3. ~~The footnote on page 2-2, added in response to EPA specific comment # 6, refers to~~ "MCCS" and does not appear to be properly referenced within the text. Please correct this in the text and add MCCS to the acronym list, define it, and submit a change page for the acronym list. EPA requested building 852 be added to the text paragraph. Adding it to the footnote only is not sufficient. Additionally, EPA requested an explanation for what was stored in building 405. Since it has been used as such in the last 10 years there should certainly be a record of what is stored there, if by nothing more than an interview. Change the text to explain what is stored in building 405 as requested. Submit a change page that reflects the footnote number in the text, the reference to building 852, and what is stored in building 405.
4. For EPA comment number 9 the requested language was not incorporated in the revision. Add "in the limited area sampled" to the end of the first sentence of the second paragraph. Submit a change page.
5. For EPA comment 11, add a footnote to the first sentence of the third paragraph on page 2-4. The footnote should read "Although SVOCs were not previously analyzed for in groundwater at the site, current sampling plans do call for SVOC analysis and groundwater is being further investigated with respect to Site 55 groundwater contamination." Submit a change page.
6. For EPA comment 12, add a footnote to the third sentence of the second paragraph of Section 2.2.3. The footnote should read "EPA's comments on the SI/CS Report called for complete delineation of the soils at Sites 9 and 16 in a design document. Even though a full suite of analysis was not performed on soils at these sites, the Navy/MCRD will consider doing so in future design document sampling and analysis plans in order to fill soil data gaps." Submit a change page.
7. For EPA comment #21, change decision #4 back to its' original language as follows "If the concentration of contaminants in Site 27 soil outside the area of the equipment storage pad or in the subsurface soil beneath the pad are less than human health screening

levels, then the extent of contamination associated with the releases at the equipment storage pad will be considered to have been defined." Submit a change page.

8. For EPA comment #27, change the language on page 3-1 under Releases to Groundwater as requested to read as follows "...Sites 9, 16, and 27 to determine...". Submit a change page.
9. For EPA comment #32, the requested change was not made to table 3-1 for VOC and SVOC analysis in soils and ensure the proper methods are noted. Make the change and submit a change page.
10. For EPA comment #46, the requested change was not incorporated. Make the change and submit a change page.
11. For EPA comment #47, the requested change was not made. Update the schedule as requested and submit a change page.

This concludes EPA's conditions for approval. Please do not hesitate to contact me at (404) 562-9969 about these conditions.

Sincerely,



Lila Llamas  
Senior RPM

Attachments: Revised - Response To Comments

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