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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON GEOTECHNICAL BORINGS
INVESTIGATION SAMPLING AND ANALYSIS/WASTE CHARACTERIZATION AND
DISPOSAL PLAN AT SITE 27 EQUIPMENT PARADE DECK MCRD PARRIS ISLAND SC
2/13/2008
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

February 13, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SD-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 Site 27 Geotechnical Borings Investigation Sampling and Analysis / Waste Characterization and Disposal Plan (Reed, February 7, 2008).

Dear Sirs:

On February 7, 2008 the Navy submitted a Sampling and Analysis / Waste Characterization and Disposal Plan (SAP) for the forthcoming Geotechnical Boring Investigation in support of potential future construction of a Motor Transportation Facility (MTF) currently planned to be constructed on the Marine Corps Recruit Depot (MCRD) NPL Site 27, the Parade Deck at Parris Island, South Carolina. There are three other sites in this area; Site 9, the former Paint Waste Storage Area, Site 16, the former Pesticide Waste Disposal Area and Site 55, the Fiber Optic Vault. Collectively these Sites are identified as OU9. Preliminary Assessment and Site Investigation data indicated potential soils and ground water contamination in portions of these areas. Additional groundwater analytical data for Sites 55 and 27 have been unofficially

reported in September 2007. Some initial data and findings were submitted on December 20th as well.

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced SAP. Additionally, a conference call was held with the Navy and South Carolina Department of Health and Environmental Control (DHEC) on February 12, 2008 to resolve concerns and shortcomings of the SAP. Agreements reached included, but were not limited to:

- A boring location map with a map key should be included in the SAP.
- A PID and FID will be used if costs allow. An FID will be used if only one piece of equipment is to be used. The FID is better at detecting Benzene, Chlorobenzene, etc.
- The sampling parameters proposed in this SAP were not based on potential receiving waste disposal facility / treatment plant requirements. In addition to the requirements in these comments, the IDW will need to be sampled and analyzed in accordance with the receiving facility requirements for sampling frequency, sampling methodologies, and analytical methodologies. If process knowledge is proposed as being sufficient for use by a receiving facility, the process knowledge provided to the receiving facility will need to be provided to EPA and DHEC for review.
- Land Disposal / Use of the IDW soils will not be pursued by the Navy/MCRD. This includes neither On-Site nor Off-Site land disposal/use. The Navy understood that such use (for example, "on-site for use in the upcoming construction activities at this location") could trigger potential Land Disposal Restriction regulations (LDRs), which are complex if found to be applicable. Additionally, the Navy understood that a completely different set of sampling and analysis requirements would have been required.
- TCLP analysis may be sufficient for determining disposal requirements at a waste disposal facility, but TCLP analysis is not to be presumed sufficient for determining any use/disposition other than disposal at a waste disposal facility.
- The option of drums or roll-off box for IDW soils will remain. Sample frequency was agreed to as presented in the comments below.
- A single container will be used for IDW liquids, if possible. If a single container is used, EPA will accept one sample from that container to be analyzed for disposal/treatment purposes. If not possible, a discrete sample from each liquid IDW container must be taken and analyzed. There appears to be no approved sampling methodology for compositing liquid samples which are to be analyzed for VOCs, etc.
- Sampling and laboratory analytical methodology references are needed.
- Waste manifests for all disposed wastes will be provided to EPA and DHEC.

The following comments are made based upon the understandings reached by all parties

during that conference call:

Comments on SAP Text:

1. Page 2, Section 2.1 – The last paragraph in this section references a boring location map. Please include the map as submitted via email on February 12, 2008, which contains 9 borings and 2 hand auger holes (evenly distributed across the remote portion of Site 27.) Ensure the map has a Map Key. Reference the map in this section of the SAP.
2. Page 3, Section 2.3.1 – Since the Navy did not specify, and there does not appear to be, an approved sampling methodology for composite samples of liquid IDW to be analyzed for VOCs and SVOCs, EPA suggests using a single tank large enough to contain the total projected liquid IDW from the investigation in order to minimize sampling requirements (see below).
3. Page 4, Section 2.4, first paragraph – Since PIDs and FIDs differ in performance of detection of certain chemicals, EPA suggests using both PIDs and FIDs if possible. EPA believes there are currently available in the market place detectors which will do both. If only one can be used, due to costs limitations, then EPA suggests the FID should be used since it is better at detecting the “-enes” such as benzene and chlorobenzene, which are predominant COCs on the site. Please modify the text to indicate what will be used.
4. Page 4, Section 2.4, second paragraph – Remove “(if used)” from the text and specify what will be calibrated.
5. Page 5, Section 3.0, Paragraph 2 – As discussed and agreed to on the February 12, 2008 conference call, this paragraph should be rewritten to reflect the following:
 - The sampling parameters proposed in this SAP were not based on potential receiving waste disposal facility / treatment plant requirements. In addition to the requirements in these comments, the IDW will need to be sampled and analyzed in accordance with the receiving facility requirements for sampling frequency, sampling methodologies, and analytical methodologies. If process knowledge is proposed as being sufficient for use by a receiving facility, the process knowledge provided to the receiving facility will need to be provided to EPA and DHEC for review.
 - If a roll-off box is used (no drums) to containerize soil IDW, then 3 samples per box will be acceptable to EPA. If drums are used to containerize IDW soils, one composite sample per every 10 drums will be acceptable to EPA, provided the composite sample is composed of equal aliquots from each drum in a set of 10.
 - A single container will be used for IDW liquids, if possible. If a single container is used, EPA will accept one sample from that container to be analyzed for disposal/treatment purposes. If not possible, a discrete sample from each liquid IDW container must be taken and analyzed.

- Sampling and laboratory analytical methodology references should be included. Any lack thereof should be explained and addressed.
 - Delete the last two sentences of the paragraph, pertaining to stockpiling and on-site use of IDW soils.
6. Page 5, Section 3.0, Paragraph 4 – Add to this paragraph text addressing the conference call agreement as depicted in the first bullet in comment #5 above.
 7. Page 6, Section 4.0 – Retitle this section “Data and Reporting”. State that a very brief report will be provided to the MCRD Remedial Partnering Team and that it will include, at a minimum, the following:
 - A brief description of what actually occurred, including an explanation of any deviations from the plan.
 - Boring log sheets.
 - All lithographic and stratigraphic data collected relative to specific borings, and/or maps generated from the data.
 - All OVA screening results as relative to specific borings.
 - Brief boring hole (“well”) closure info/statements.
 - A brief description of waste generated.
 - A description of IDW samples taken.
 - IDW sample analytical results.
 - Hazardous Wastes Manifests showing the disposition of all wastes generated.
 8. Page 6, Section 4.0, Paragraph 2 – Move this text to Section 2.4 Field measurements. Simply mention here that the results from all OVA field screening will be reported to the Partnering Team.

The Navy/MCRD should respond to these comments with a revised SAP, to be submitted for review and approval prior to implementation of field work. EPA will be happy to answer any questions, or to check SAP revisions prior to the official submittal, in order to expedite this review and approval process. Please do not hesitate to contact me at (404) 562-9969 about these comments.

Additionally, EPA had previously requested information in addition to this SAP, including the H&S Plan and project field schedule, to be submitted for review only. EPA has not yet received this other information. Please notify EPA as to the projected timeframe for submission of this additional information.

EPA appreciates the Navy’s cooperation in submission of this draft SAP and looks forward to working together throughout this project. EPA believes the review of this document and subsequent conference call discussions will result in a much improved SAP, improved Partnering Team relations, as well as potentially diverting problems with other environmental regulations. If there is anything EPA can do to help expedite this project, please let us know, so

the Navy/MCRD can move forward with planning and contracting the geotechnical boring investigation work.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lila Llamas".

Lila Llamas
Senior RPM

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