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EMAIL REGARDING U S EPA REGION IV COMMENTS ON IN-SITU CHEMICAL OXIDATION
TREATABILITY STUDY FOR SITE 45 DRY CLEANING FACILITY SPILL AREA MCRD
PARRIS ISLAND SC
2/13/2009
U S EPA REGION IV

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Cc: bowersjb@dhec.sc.gov; Su.Chunming@epamail.epa.gov; huling.scott@epamail.epa.gov
Subject: Re: UPDATE: ISCO Treatability Study at Site 45, and Chunming Monitoring
Date: Friday, February 13, 2009 2:11:54 PM

PLEASE IGNORE THE OTHER VERSION OF THIS EMAIL. I THOUGHT I HAD ANNIE ADDED IN MY EMAIL LIST, BUT APPARENTLY IT DID NOT SAVE. DELETE THE OTHER COPY AND USE THIS ONE TO REPLY. THANKS.

Hi folks,

I recently had a conversation with Scott Huling of EPA - Ada Oklahoma Lab, our contact person for the oxidant study at Site 45 Secondary Plume Area. A short time after our last meeting, Scott and I talked, and as a result I suggested that he and Don Vroblesky make sure they talk and see if they are on the same page with their findings at the site (since we had just seen Don's presentation at the meeting.) Scott and Don have since spoken and have learned from each other by sharing their data and findings, and appear to have validated each others' findings (that's always good news !). As you recall, that was one of our instructions to all of our study groups. Since Site 45 is so popular, we asked that they all share data and compare findings. A second instruction we gave them all was to coordinate with each other, to make sure if they were sharing wells, that their visits to the site either were at the same time, so they could split or duplicate samples, or were far enough apart to allow wells to settle back down... and possibly to share equipment, resources, etc., as needed, as well as to minimize impact to base personnel (giving Tim and Heber less frequent visitors.)

In the name of coordinating, Scott and Chunming Su, one of our other study leads, have been coordinating visits to the site. They have planned a visit in March, which is driven by Chunming's scheduled sampling event for the last of his monitoring events (for this term - however, Chunming would like to extend the monitoring - see below). Scott has completed implementation of his Phase I work plan for gathering additional site characterization data, and is now almost ready to submit a work plan for Phase II - implementation of the oxidant treatment being studied (which may also include a wee bit more characterization, in order to expand the transects a little closer to the building). Scott is trying to complete his internal review, so he can get the plan to us next week or so. He will be asking for an expedited review, if at all possible, in order to stay on schedule with Chunming for this next site visit. In order to pave the way for an expedited review, I have suggest Scott review our comments from the first work plan, to make sure he addresses those same issues as they would apply to Phase II. I told him from EPA's perspective, we would not likely have much to say about the technological design, since this is a treatability study for an approach not proven before. However, he could expect the same basic requirements (all that is necessary to obtain state approval for permits, proper disposition of IDW, commitments to providing reports, a schedule, precautions with respect to confining layers, safety issues, coordination with other groups, and an understanding that when we are ready to move forward with Site work, we will have to move forward, etc.) Scott will make sure these things are addressed in his draft work plan. Hopefully this will minimize the need for comment. But we will see. Furthermore, I have suggested he

touch base with Annie, since she will be hit cold with this plan. He will make sure Annie has a copy of the Phase I Work Plan, so she can come up to date on where we are with the study, and he will make sure he is clear on the requirements for state approval for wells, etc. I also suggested to Scott that if he feels a conference call with the team would help expedite review, we could maybe do that. I recognize everyone has different priorities. Please let me know if there is anything else we can ask Scott to do to help us expedite approval.

Meanwhile, I have also had a call from Chunming Su of EPA, also of Ada Oklahoma Lab. He is working on a study in the Primary Source Zone Area of Site 45. Chunming will be conducting the "final" round of sampling and would like to continue monitoring the performance of the emulsified zero valent iron (EZVI) technology for treating DNAPL source zone chlorinated solvents after the completion of the ESTCP project in March 2009. There is a lack of information about the long-term effectiveness of the EZVI performance and our site would be well suited for further testing. Geosyntec did the EZVI injection in October 2006 and Chunming sampled groundwater before (3 trips) and after the injection (6 trips). He is in the processing of preparing an EPA Fact Sheet for this site, which he will be sharing with us. Also, a formal report will soon be submitted by Geosyntec to ESTCP and our Team. But Chunming would like to continue his monitoring even though the rest of the study will be wrapping up. If you would be willing to approve continued monitoring under the same plan, given that Chunming is also aware that when we are ready to move forward with a remedy we will have to do so, please let me know. Or if you have concerns or reasons why we should not allow this, please indicate that as well.

I look forward to your responses regarding approval of continued monitoring, as well as ideas of anything else Scott could do to expedite review of the forthcoming Phase II Implementation Work Plan.

Thanks,
Lila
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