EMAIL REGARDING U S EPA REGION IV COMMENTS ON ROAD REPAIR PROJECT AFFECTING SITE 45 DRY CLEANING FACILITY SPILL AREA WITH ATTACHMENT MCRD PARRIS ISLAND SC

7/21/2009

U S EPA REGION IV

From:	Llamas.Lila@epamail.epa.gov
To:	Harrington CIV Timothy J
Cc:	Meredith Amick; Annie Gerry; mmcrae@techlawinc.com; Llamas.Lila@epamail.epa.gov; Sladic, Mark
Subject:	Re: SITE 45 - REPAIRS TO PANAMA STREET
Date:	Tuesday, July 21, 2009 11:19:48 AM
Attachments:	Panama_St_Repair_Efforts_Site 45_Imagery_Revised_050809.pdf

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Hi Tim and others,

The letter reads well. I've added a couple of scratches to the letter (SEE BELOW - Let me know if you do not see the strikeouts, highlighted added text, and red notes) to 1) reflect the recent measurement of water at 1 foot bgs (although we have not received the official data yet), 2) a request for you to add language addressing what will be done if the water table is encountered during demolition and/or construction, 3) to request the analytical results be provided to the team, and 4) to ensure proper recycling procedures are followed. That's all if you go with what you have (see below.)

Now here's another thought.... The assumption of this letter appears to be that we do not have sufficient data to show a clean edge for soils and/or gw in the area of full asphalt excavation. I glanced back at the Site 45 VI CSM and it looks like we do have it for PCE and TCE in gw. HOWEVER, the figures in the CSM do not state if those results are SU or SL wells, although the text indicates the subject of the CSM would be SU well results, so check to make sure they are SU. (MARK - ADD THIS TO MY SITE 45 VI CSM COMMENTS TO PROPERLY LABEL THE FIGURES. THANKS.) You, Tim, should be looking at SU well results with respect to this project as well. So you might want to check the other COCs to see if they also have a clean edge at the full depth asphalt demolition area. And I can't remember if Geosyntech gathered some more data in this area as well, or not. Also, since you will have to take soil samples anyway to dispose of the soils removed, you might consider taking those samples up front, to see if you can show a clean edge, which not only might address soil disposal, but would also let you avoid the 40 hour trained employees. EPA has also commented on the need to delineate a clean edge north of the primary source zone as well. So this data could double for part of the Site 45 data gap filling. Just a thought, but it is your project.

Call me with questions.

Lila

"Harrington CIV Timothy J" <timothy.j.harrington@usmc.mil> 07/20/2009 11:36 AM	To Lila Llamas/R4/USEPA/US@EPA, "Meredith Amick" <AmickMS@dhec.sc.gov>, "Annie Gerry" <GerryAM@dhec.sc.gov> cc <mmcrae@techlawinc.com> Subject SITE 45 - REPAIRS TO PANAMA

STREET

Lila, Meredith, Annie,

Parris Island has a large road repair project ongoing. A portion of the project will affect Site 45. Below is a description of the work that we believe impacts Site 45 and the proposed mitigation. In anticipation of the work, I will be sending a letter, the text of which, I have included in this e-mail.

At this point, I would like to get your initial reaction to the proposed work and what you might want to see regarding project details, etc.

V/R, Tim

This letter is to notify USEPA of Marine Corps Recruit Depot Parris Island's (MCRD) proposed plan to perform repairs along Panama Street from Cavite Street to Nicaragua Street and to eliminate ponding of stormwater in the street. This work is anticipated to occur before the end of 2009. A portion of Panama Street, from approximately Samoa Street to Johnson Street, falls within the vicinity of Installation Restoration Program (IRP) Site 45 (Areas A and B of the Panama Street project site). Site 45 consists of a former dry cleaners; chlorinated solvent contamination is present in soils, soil vapor, and groundwater resulting from spills that occurred during the operation of the dry cleaners. The Panama Street project site (hereafter referred to as the "project site") in relation to Site 45 is shown on Enclosure 1.

Based on the dry cleaning operations, PCE and its degradation products (trichloroethylene [TCE], cis-1, 2- dichloroethene [cis-1,2-DCE], 1, 2-DCE, and vinyl chloride [VC]) were detected in surface and subsurface soils and groundwater above screening levels within and around Site 45 prior to June 2005. Groundwater in the area can be as shallow as 3.5 feet 1 foot below ground surface (bgs); however, the plume flow direction in the upper surficial aquifer is generally to the southeast (Geosyntec, 2007), which would indicate that the plume is migrating away from the project site.

Repairs and work to be conducted within the Site 45 vicinity include installation of a 36 inch concrete curb and gutter and full depth

pavement
repair at the southeast corner of the Panama and Samoa Street intersection,
mill and overlay of asphalt across most of the project site, installation of
new concrete collars on three existing monitoring wells located just west of
the Samoa and Panama Street intersection, and installation of a new sidewalk
at the southwest corner of the Panama and Samoa Street intersection. As part
of the grading and storm drainage plan, work will include tie-in of a new
storm drainage pipe into the existing storm drainage structure near the
southeast corner of the Panama and Samoa Street intersection, and the
cleaning and flushing of existing and new storm drainage pipes and
structures. The site will be graded to direct runoff from the centerline of
Panama Street toward the storm drains on the south side of the street.
Repairs should alleviate stormwater ponding noted at the intersection of
Samoa and Panama Streets.

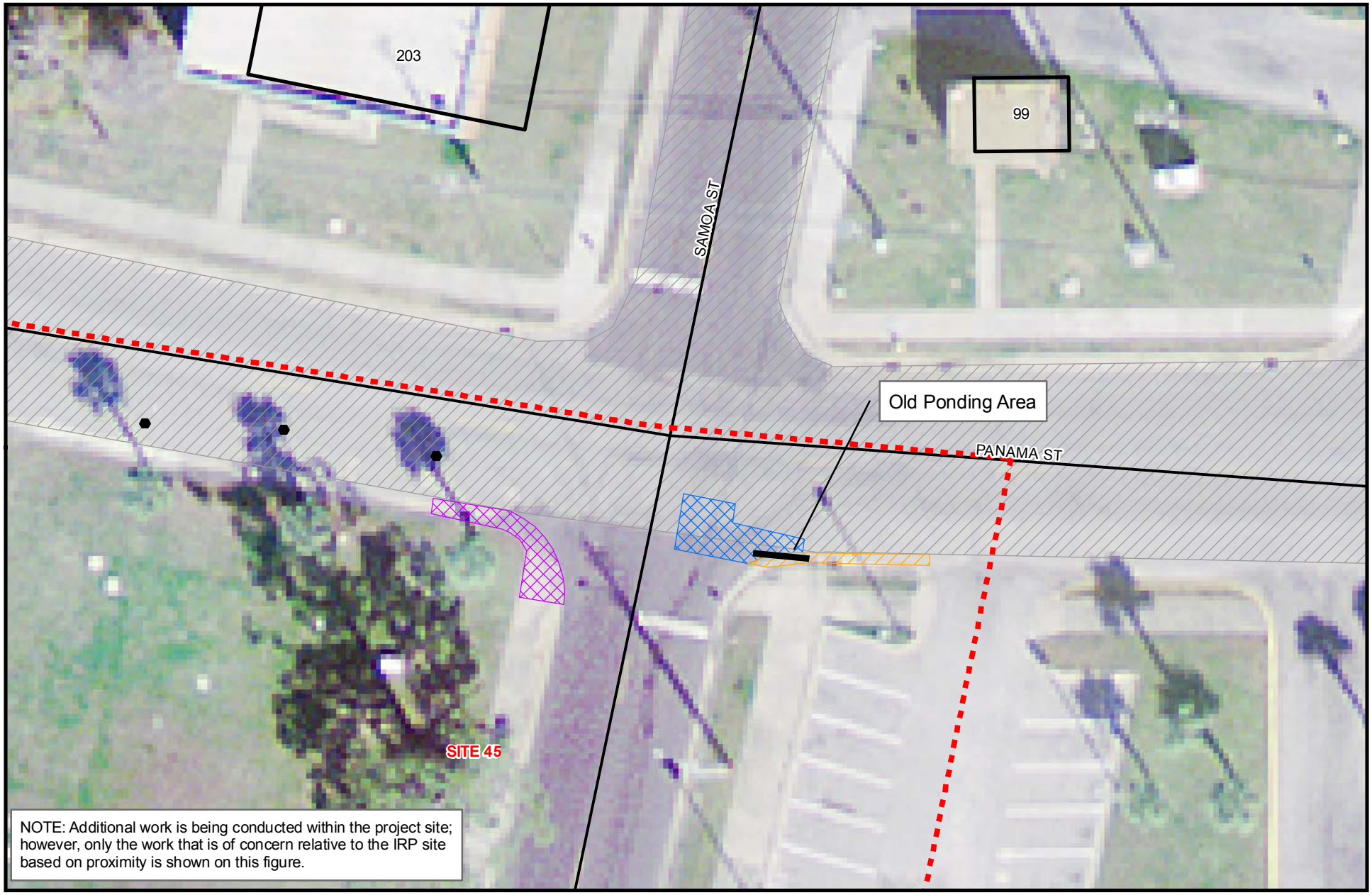
Milling and overlay activities, which will occur across most of Panama
Street located near Site 45, will not impact or encounter underlying
soils because ½ inch
of existing asphaltic concrete (AC), the existing aggregate base course, and
the existing sand asphalt are to remain in place. Concrete collars that
surround the existing monitoring wells in this location will be replaced.
Construction of these collars is not anticipated to impact or encounter
underlying soils.

During full depth asphalt repairs the subgrade material will be removed to
a depth of 12 inches below the base course and replaced with controlled
fill. Soils as deep as 16 inches could be disturbed because of the full
depth asphalt repair, while soils as deep as 3 feet bgs could be disturbed
because of the storm drainage pipeline repair. [NOTE: Please add
something to this paragraph that explains what you will have to do if
the water table is encountered during demolition and/or construction
given the recent 1 foot bgs measurement, i.e. pumping? and if so, what
is done with the water?] These subgrade materials and
underlying soils have the potential to be contaminated with volatile organic
compounds (VOCs) that have migrated from Site 45. Consequently, excavated
soils will be collected and temporarily stored in a roll off bin onsite.
Soils will be analyzed in accordance with landfill requirements and, depending
on the waste characterization results, soils will be disposed of as
hazardous or nonhazardous waste at a facility approved by EPA under the
Comprehensive Environmental Response, Compensation, and Liability Act
(CERCLA) rule, such as Hickory Hill Landfill located in Ridgeland, South
Carolina. Analytical results will be provided to the PI FFA Team and
incorporated into the Site databases.

Because the asphalt and concrete from within this portion of the project
site are expected to be minimally impacted by VOCs and any residual

contaminants would rapidly volatilize, recycling of these materials will be
conducted consistent with the rest of the project site. [Not sure what
these "rest of the project site" procedures are with respect to waste
coming from a hazardous waste site. Please ensure recycling
requirements/rules are followed specific to materials coming from
hazardous waste sites, even though little is anticipated to be on them.]
Similarly,
contamination of equipment is expected to be minimal but dirt removal
efforts will be conducted prior to leaving the Site 45 area. Dirt
removal
efforts will consist of removing residual soil on excavation equipment
with
a dry brush.

Because work will be conducted near this IRP site, the contractor
performing
the construction activities will be required to provide certification
that
workers have received the appropriate Hazardous Waste Operations and
Emergency Response (HAZWOPER) training prior to performing any work near
Site 45 (29 CFR 1910.120). The contract also requires the contractor (1)
to
comply with the applicable or relevant and appropriate requirements
(ARARs)
of the Resource Conservation and Recovery Act (RCRA) including the
provisions of 40 CFR 261 to characterize a waste, and ARARs from other
laws
and (2) to provide an adequate health and safety plan, given the
potential
for VOC contamination within the project site.
(See attached file: Panama_St_Repair_Efforts_Site
45_Imagery_Revised_050809.pdf)



LEGEND

- Installation of New Concrete Collars on Monitoring Wells
- Installation of Sidewalk
- Tie in of New Storm Drainage Pipeline to Existing Pipeline
- Installation of 36 Inch Concrete Curbs and Gutters
- Full Depth Asphalt Repair
- Mill and Overlay of Asphalt
- IRP Site

N

0 15 30 Feet

Enclosure 1
Panama Street Repair Efforts in the Vicinity of Site 45
Marine Corps Recruit Depot
Parris Island, SC

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