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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT FINAL SAMPLING AND
ANALYSIS PLAN FOR MUNITIONS RESPONSE PROGRAM SITE INSPECTIONS AT EIGHT
MUNITIONS RESPONSE SITES VOLUMES 1 AND 2 OF 2 MCRD PARRIS ISLAND SC

3/31/2010
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960**

March 31, 2010

**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: Tim Harrington
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the Draft Final Sampling and Analysis Plan for Munitions Response Program Site Inspections at Eight Munitions Response Sites Volumes I and II (MC SAP and MEC SAP) for the Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (~~September 2009~~).

Jan. 2010 Lol

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document, which is actually two separate UFP SAPs, one contained inside the other. Since the investigations have been / are being conducted before finalization of the UFP SAP, the Navy should realize they have proceeded at risk. While scoping/reviewing this document, it became apparent that the goal was actually to reduce the UXO footprint, rather than clear and close the UXO sites. Since this document has been produced for the purpose of reducing the footprint while proceeding at risk, EPA will not submit any additional comments at this time. However, EPA will expect that the comments submitted previously have been addressed in the field, regardless of the state of this SAP and/or its final wording. Additionally, a few comments have not been sufficiently responded to, and have resulted in the following concerns:

- EPA requested a plan and schedule for adding the MRP sites to the FFA prior to proceeding with the SAP. No plan or schedule for adding the site to the FFA, nor any plan for resolving the issue, has been submitted to EPA. EPA understands the Navy/MCRD proceeded with the SAP without meeting EPA's request. Please submit the plan and schedule.
- EPA believes the application of the Range Environmental Vulnerability Assessment (REVA) study could be useful at all UXO sediment sites, at least in part, with respect to contaminant fate and transport, and contaminant bioavailability. This may be useful in this UXO study results report, especially when it comes to conclusions. EPA recommends the Navy/MCRD have additional conversations with the researchers involved in the REVA study, regarding potential applicability to other sediment sites at MCRD, regardless of whether they are small arms ranges or not, if they have the potential for the same (either whole or in part) contaminant releases. EPA would appreciate if MCRD would report back to the team after having these conversations. Additionally, EPA is requesting a copy of the Range Environmental Vulnerability Assessment Report.
- Regarding any UXO sites with areas/investigation omitted: Many areas remain such that additional investigation and/or Land Use Controls will be needed. It appears the Navy has addressed this concern in part by incorporating responses to comments pertaining to deferral of UXO sites (UXO 1), deferral of portions of UXO sites (several), deferral of phases of investigation (MC investigation; groundwater), insufficient survey penetration depth (several sites), etc. Decision criteria have been modified to attempt to address this, with a wide-sweeping statement of discussions regarding additional investigation needs after this investigation is complete and results are reviewed. EPA wants to point out that the result is the decision criteria will only likely result in an actual decision with respect to the portions which were not deferred or omitted in some way, and will not apply to the UXO site as a whole. Therefore, it is doubtful that any UXO sites will be able to obtain a no further action required determination, and will require a Remedial Investigation (RI) and/or at least Land Use Controls as a remedial action. It is important to remember these deferrals and insufficiencies as the SAP Report is written, and as conclusions and recommendations are drafted.

Therefore, considering the document's purpose was to proceed at risk with the hope to reduce the UXO footprint, EPA finds this document sufficient for its intended purpose. If there is any way EPA can assist, please do not hesitate to call me at (404) 562-9969.

Sincerely,



Lila Llamas
Senior RPM
Federal Facilities Branch
Superfund Division

cc: Meredith Amick, SCDHEC
Annie Gerry, SCDHEC
Mark Sladic, TtNus ✓