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MCRD PARRIS ISLAND  
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON ACCESS ROAD  
PERMIT APPLICATION PUBLIC NOTICE 2008-1988-IIT MCRD PARRIS ISLAND SC  
6/2/2010  
U S EPA REGION IV



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

June 2, 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 Letter to COE regarding Public Notice # 2008-1988-1IT Marine Corps Recruit Depot, Parris Island, SC. Ballast Creek Access Road Project (January 2010)

Dear Sirs:

Attached you will find a letter to the Corps of Engineers (COE) and South Carolina Department of Health and Environmental Control (SCDHEC) - Office of Ocean and Coastal Resources Management from EPA regarding the Marine Corps Recruit Depot (MCRD) Access Road Permit Application Public Notice # 2008-1988-1IT. EPA was contacted regarding this application due to the status of MCRD as a National Priorities List (NPL) Superfund Site. As such, any work performed within a contaminated area of the Site should have review and approval prior to implementation. Review and approval should be sought through the Parris Island Partnering Team.

A cursory review of this project reveals the majority of environmental project impacts are made to resources regulated by COE and the specified SCDHEC Office. EPA recognizes the potential for either denial of this permit or changes to the permit application details. EPA would require a final plan in order to give approval for work to proceed in a contaminated area. Therefore, at this time EPA only provided a limited number of general comments. Although limited and general in nature, these comments

are critical to the ultimate compliance by MCRD and the Navy with the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA).

EPA anticipates as this project progresses, the Navy/MCRD will keep EPA informed and will pursue review and approval through the partnering team at the appropriate time. If there are any questions regarding this matter or the attached comments, please do not hesitate to contact me at (404) 562-9969.

Sincerely,

A handwritten signature in black ink that reads "Lila Llamas". The signature is written in a cursive, flowing style.

Lila Llamas  
Senior RPM

Attachment:



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

June 2, 2010

4SD-FFB

Charleston District, Corps of Engineers  
69A Hagood Avenue  
Charleston, South Carolina 29403-5107  
Attn: Tracy Dotolo Sanders

And

S.C. Department of Health and Environmental Control  
Office of Ocean and Coastal Resources Management  
1362 McMillan Avenue, Suite 400  
Charleston, South Carolina 29405  
Attn: Public Notice # 2008-1988-IIT POC

SUBJ: Public Notice # 2008-1988-IIT Marine Corps Recruit Depot, Parris Island, SC. Ballast Creek Access Road Project (January 2010)

To Whom It May Concern:

The U.S. Environmental Protection Agency (EPA) has completed a cursory review of the above referenced Public Notice. The Public Notice was provided to EPA on June 1, 2010 by the Corps of Engineers (COE). EPA has concerns regarding this project since the Marine Corps Recruit Depot (MCRD), Parris Island (PI), S.C. is a National Priorities List (NPL) Superfund Site over which EPA has oversight and enforcement authority. Any work performed within a contaminated area should have review and approval prior to implementation. Review and approval should be sought through the Parris Island Partnering Team, upon which Mr. Tim Harrington of MCRD and Mr. Charles Cook of the Navy participate. Mr. Harrington and Mr. Cook may be reached at 843-228-3423 or 904-542-6409 respectively.

A cursory review of this document reveals that the majority of the environmental project impacts are made to resources regulated by COE and the South Carolina Department of Health and Environmental Control (SCDHEC) Office of Ocean and Coastal Resources Management. EPA recognizes the potential for either denial of this permit or changes to this permit application details. EPA would require a final plan in order to give approval for work to proceed in a contaminated area. Therefore, at this time EPA will only provide a limited number of general comments. Although limited and general in nature, these comments are critical to the ultimate compliance by MCRD and the Navy with the Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA), otherwise known as Superfund.

EPA's general comments are as follows:

**GENERAL COMMENTS:**

1. BEFORE WORK PROCEEDS, MCRD should obtain review and approval of their Access Road plan through the Parris Island Partnering Team to ensure compliance with CERCLA if there will be any disturbances at CERCLA sites. A final plan would be needed which provides sufficient detail to determine if contaminated areas of the NPL Site will be disturbed, and to ensure compliance with Land Use Controls (LUC) which are in place at CERCLA sites. A detailed project map should be included which clearly superimposes project locations with the locations of MCRD CERCLA sites and associated LUC boundaries. (See Harrington or Cook for CERCLA site locations.)
2. The location proposed for mitigation is a CERCLA hazardous waste site, Site 12, Jericho Island. Contaminants have been removed from the sediments and surface soils to levels allowing for unrestricted use and unlimited exposure. HOWEVER, the groundwater beneath the site showed contamination levels slightly above the Maximum Contaminant Level (MCL). Therefore, Land Use Controls were put in place to ensure there was no extraction or use of the groundwater beneath the site. Plans for this project should ensure there is to be no extraction or use of groundwater within the LUC boundary for Site 12 or an exemption must be obtained through the PI Partnering Team.
3. Also at Site 12, a requirement of the CERCLA remedy was to reestablish Spartina in the disturbed areas of the marsh. This is a requirement that must be met by MCRD regardless of the roads project. It is difficult to tell from the drawings exactly how much additional establishment of marsh areas is being accomplished. COE and SCDHEC should be aware of this when considering the mitigation as a factor for application approval. (See Harrington or Cook for Site restoration area maps.)
4. The PI Partnering team has obtained professional conclusions and recommendations regarding what is needed to obtain success in the reestablishment of Spartina in the disturbed areas of the marsh at two CERCLA sites, one of which is Site 12. If MCRD is to implement this mitigation effort, plans should be based on the conclusions and recommendations obtained. (See Harrington or Cook for the recommendations.)

This completes EPA's general comments regarding the Public Notice - Access Road application. If there are any questions on these comments, please do not hesitate to contact me at (404) 562-9969.

Sincerely,



Lila Llamas  
Senior RPM