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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON THE BUILDING
CONSTRUCTION ACTIVITIES LETTER FOR SITES 9, 16, 27 AND 55 MCRD PARRIS ISLAND
SC
6/8/2012
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 8, 2012

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Mr. 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 Office
Attn: Ms. Lisa Donohoe
PO Box 5028
Parris Island, SC 29905-9001

Dear Mr. Cook and Ms. Donohoe:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Navy's letter regarding "MCRD PARRIS ISLAND, SITES 27/55/9/16 MOTOR-T BUILDING CONSTRUCTION ACTIVITIES" (Cook, May 3, 2012). In the letter the Navy notifies EPA and the state of intrusive activities which will occur at Site 27 and Site 55, both sites being addressed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina, is a National Priorities List site, and as such is subject to investigation and remediation under CERCLA and the Federal Facilities Agreement (FFA) entered into by the Navy, Marine Corps, EPA, and South Carolina.

The Navy letter describes very briefly two separate actions planned for at the sites, one being the installation of a utility trench and the other installation of light poles. EPA's concerns pertaining to these activities is the subject of this letter in response to the letter received. Each activity is addressed separately below.

The trench being installed for routing fiber optic cables is reportedly from the southern end of the newly constructed Motor-T facility to a fiber optic communication hand hole located southwest of building 405. The trench is described as being a maximum of 36 inches deep below grade. EPA has clarified that the Navy intends this to mean below the current grade, whether that be with fill present or not. This

depth should not be exceeded without notifying EPA. Given the limit of this excavation, it is not likely that contamination will be encountered based on data submitted by the Navy in the area of proposed trenching. However, if the Navy chooses to proceed with the installation, work should proceed cautiously. The Navy and MCRD should provide information to the construction contractor that informs them that the activity is being conducted within the boundaries of a CERCLA site, in which known contamination exists in the soils and groundwater, and in which hot spots have been detected. The contractor should be instructed not to exceed a depth of 36" below grade. Proper health and safety protective measures should be taken in case of potential exposure. While it appears unlikely that contaminated soils or groundwater will be encountered, the contractor should be observant during construction, looking for any signs in the soil of staining, vapors or odors present, etc. The contractor should also be careful that groundwater is not encountered. Typically groundwater would not be present at depths less than 36" below grade, however, groundwater has been measured historically at certain locations on MCRD as shallow as 1 foot below ground surface during periods of high rainfall on MCRD. If these signs in soil become apparent or groundwater is encountered, the contractor should notify the Navy immediately and cease work until presence or absence of contamination can be confirmed. If it is determined that contamination has been encountered, the work should not continue until a written plan for proceeding in the presence of contamination has been submitted to EPA for review and approval is obtained. The necessary details of such a plan should be discussed with EPA prior to submittal, but in general should include not only safety measures to be taken, but also a plan for handling, storing, sampling and disposal of all disturbed site materials in accordance with all applicable, relevant and appropriate regulations.

The light poles proposed for installation are proposed for locations immediately within the high contamination areas of site 55. When the Navy first discussed construction of the Motor-T facility on site 27 EPA emphasized to the Navy that no intrusive activity should occur within the areas of known contamination in Site 55. The Navy assured EPA that intrusive activity would be limited to site 27, west of the known areas of high contamination and not on site 55 at all except for installation of a parking lot on the surface. EPA clarified with the Navy that construction of the parking lot should not take place since it may have to be damaged during remediation activities (potentially trenching, extraction well installation, removal via dig & haul, etc.), but the Navy indicated that the presence of the parking lot would in no way be allowed to inhibit either investigation or remediation of the CERCLA site. Now the Navy is not only proposing the parking lot be installed on the surface, but also proposing intrusive activities and installation at depth of structures which might impede investigation and/or remediation. The Navy letter indicates holes for the poles will be dug to a depth of 6 feet. The Navy has presented data which indicates the presence of soils contamination at a depth of 4 to 5 feet deep east of the proposed light pole placements, and at a depth of 5-6 feet deep west of the proposed light pole locations, in addition to contaminated groundwater likely being present at about 5 feet deep, placing the light poles directly within contamination at a depth which would be encountered during construction. Therefore, EPA strongly discourages the installation of these light poles and the parking lot. Remedial investigation has presented additional data which supports EPA's concern that remediation will likely be necessary in this area, although the remedial alternatives have not yet been evaluated nor a remedy or set of remedies chosen. However, EPA can say that dig & haul, trenching, and extraction, in addition to other alternatives, will necessarily be included in an alternatives analysis. If the Navy chooses to proceed with installation, EPA will not accept negative impacts to or the cost of destruction and replacement of these structures to be considered in the remedial alternative analysis.

If the Navy and/or MCRD insists on installation of the light poles, a Work Plan to address how the work will be conducted, since it is in an area of known contamination and therefore will likely encounter contaminated soils and contaminated groundwater during construction, must be submitted for review

and approval prior to initiation of the construction activity. The work should not take place until approval of the Work Plan is obtained. The necessary details of such a plan should be discussed with EPA prior to submittal, but in general should include not only safety measures to be taken, but also a plan for handling, storing, sampling and disposal of all disturbed site materials off site (not for reuse on site) in accordance with all applicable, relevant and appropriate regulations, recognizing the materials will likely be hazardous waste.

EPA is available to answer any questions the Navy or MCRD may have regarding these concerns. Please feel free to call. I can be reached at 404-562-9969.

Sincerely,



Lila Llamas
Senior RPM
Federal Facilities Branch
Superfund Division

cc: Meredith Amick, SCDHEC
Peggy Churchill, TtNus

