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MCRD PARRIS ISLAND
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LETTER AND ATTACHED U S EPA REGION IV COMMENTS REGARDING THE DRAFT SITE
INSPECTION REPORT ADDENDUM FOR UNEXPLODED ORDNANCE 1 (UXO 1) NO
FURTHER ACTION MCRD PARRIS ISALND SC
03/20/2015
U S EPA REGION IV ATLANTA GA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

March 20, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nicole Cowand
NAVFAC Mid-Atlantic
MC NC IPT, Code OPQE
6506 Hampton Boulevard
C/o Lafayette River Complex, Bldg. C, Room 3005
Norfolk, Virginia 23508-1278

AND

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs Office
Attn: Mr. Tim Harrington
PO Box 5028
Parris Island, SC 29905-9001

Dear Ms. Cowand and Mr. Harrington:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft (D1) Site Inspection Report Addendum for UXO 1 No Further Action, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (June 2014). EPA has reviewed the document in accordance with pertinent laws, regulations, and guidance. The review resulted in the enclosed comments. Please feel free to call with any questions. I can be reached at 404-562-9969.

Sincerely,

LILA LLAMAS

Digitally signed by LILA LLAMAS
DN: c=US, o=U.S. Government, ou=USEPA,
ou=Staff, cn=LILA LLAMAS,
dnQualifier=000007018
Date: 2015.03.20 15:14:29 -0400

Senior RPM
Federal Facilities Branch
Superfund Division

Enclosure

cc: Meredith Amick, SCDHEC
Peggy Churchill, TtNus

**EPA TECHNICAL REVIEW OF THE
SITE INSPECTION REPORT ADDENDUM FOR
UXO 1 NO FURTHER ACTION
DATED JUNE 2014**

**MARINE CORPS RECRUIT DEPOT (MCRD)
PARRIS ISLAND, SOUTH CAROLINA**

GENERAL COMMENTS:

1. The Site Inspection Report Addendum for UXO 1 (SI Addendum) makes an argument that there was no evidence of the existence of a grenade range in the location of UXO 1 as identified in the Archive Search Report (ASR). The SI Addendum further states that the location of the grenade range described in the ASR by Mr. Swearngen, and subsequently named UXO1, was misinterpreted in the ASR and that it actually coincides with either the rifle grenade range, hand grenade court, or hand grenade practice area shown on SI Addendum Attachment 1 figures. Furthermore, the SI Addendum states these grenade ranges which were identified are located within the current boundary of the Weapons Battalion Training Area of MCRD, Parris Island, but it does not specify their inclusion in a specific range. Finally, Figure 7 of the SI Addendum Attachment 1 does not indicate the grenade ranges are part of any specific range.

According to the ASR, as described in Section 7.2.1 Khe Sanh/Range A, the hand grenade courts and rifle grenade circles are a reported use as part of Khe Sanh/Range A. The ASR Plate 3 further identifies the ranges in what appears to be subsets to Range A (i.e. A1 and A3). **It is unclear if this was the exact intent. Please clarify.**

This description of the grenade courts as being part of Khe Sanh/Range A and plated as such is carried forward into the ASR companion document, the Range Identification and Preliminary Range Assessment (RIPRA) for MCRD, Parris Island, SC. **It is unclear why the Navy/MCRD has a different map of Range A than the ASR and RIPRA, and whether they also have a different description of uses included as part of Range A. Clarification is needed.**

In order to approve a No Further Action recommendation for UXO 1 based on its non-existence and/or misinterpreted location, the grenade ranges that were identified and confirmed to exist in the nearby area should be shown to be part of a range record which will be carried forward to ensure the grenade ranges in question are addressed at some point in the future when the range closes. **Please clarify this in the report with specific written range descriptions, commitments to address upon range closure, and references to range tracking documents, as well as modified range maps, etc. as appropriate.**

Otherwise, these mapped and listed grenade ranges should be identified as UXO 1 and be investigated when the Weapons Battalion Area and any overlapping ranges close. Extensive report modification would be necessary to support this approach.

2. If modifications are made to the SI Addendum, please clarify if the modifications to the report have been made: 1) in a manner consistent with the Department of Defense (DOD) range rule, or any other applicable rules or guidance or programs; and 2) throughout the DOD, for example the Department of Defense Explosives Safety Board or the Military Munitions Response Program¹; the

Marine Corps, for example Marine Corps Systems Command; the Marine Corps Recruit Depot, for example CERCLA documents and non-CERCLA documents, etc.

3. Acronyms throughout the document, including attachments, are either not defined or used and defined inconsistently. For example, ASR as “Archive Search Report” versus “Archives Search Report”, EOD as “Explosives Ordnance Disposal” versus “Explosive Ordnance Disposal”, etc. Please note for future documents. No changes necessary.
4. Figures referenced in the document are not accurately referenced, i.e. “Figures 4 through 6”. Figure 5 does not contain the identified grenade courts but was included in the grenade court figure reference. Figure 7 does include the grenade courts but was not in the grenade court figure reference. Please correct all figure references throughout the document.
5. References are assumed to be readily available to the public, however, the ASR and RIPRA are not. Please clarify how this will be addressed in the administrative file which is intended to be a public record.

Note: In future documents if references are not publically available, arrangements should be made with EPA to access the documents to assist in expediting the review.

1. Note: See inconsistent map on MMRP website i.e. UXO1 mislocated, UXO4a missing, UXO4 boundaries inconsistent with current CERCLA submittals, UXO 5 boundary includes the Grenade Range which has been excluded in CERCLA documents, etc.

**EPA TECHNICAL REVIEW OF THE
SITE INSPECTION REPORT ADDENDUM FOR
UXO 1 NO FURTHER ACTION
DATED JUNE 2014**

**MARINE CORPS RECRUIT DEPOT (MCRD)
PARRIS ISLAND, SOUTH CAROLINA**

GENERAL COMMENTS:

1. **Comment:** The Site Inspection Report Addendum for UXO 1 (SI Addendum) makes an argument that there was no evidence of the existence of a grenade range in the location of UXO 1 as identified in the Archive Search Report (ASR). The SI Addendum further states that the location of the grenade range described in the ASR by Mr. Swearngen, and subsequently named UXO 1, was misinterpreted in the ASR and that it actually coincides with either the rifle grenade range, hand grenade court, or hand grenade practice area shown on SI Addendum Attachment 1 figures. Furthermore, the SI Addendum states these grenade ranges which were identified are located within the current boundary of the Weapons Battalion Training Area of MCRD, Parris Island, but it does not specify their inclusion in a specific range. Finally, Figure 7 of the SI Addendum Attachment 1 does not indicate the grenade ranges are part of any specific range.

According to the ASR, as described in Section 7.2.1 Khe Sanh/Range A, the hand grenade courts and rifle grenade circles are a reported use as part of Khe Sanh/Range A. The ASR Plate 3 further identifies the ranges in what appears to be subsets to Range A (i.e. A1 and A3). **It is unclear if this was the exact intent. Please clarify.**

This description of the grenade courts as being part of Khe Sanh/Range A and plated as such is carried forward into the ASR companion document, the Range Identification and Preliminary Range Assessment (RIPRA) for MCRD, Parris Island, SC. **It is unclear why the Navy/MCRD has a different map of Range A than the ASR and RIPRA, and whether they also have a different description of uses included as part of Range A. Clarification is needed.**

In order to approve a No Further Action recommendation for UXO 1 based on its non-existence and/or misinterpreted location, the grenade ranges that were identified and confirmed to exist in the nearby area should be shown to be part of a range record which will be carried forward to ensure the grenade ranges in question are addressed at some point in the future when the range closes. **Please clarify this in the report with specific written range descriptions, commitments to address upon range closure, and references to range tracking documents, as well as modified range maps, etc. as appropriate.**

Otherwise, these mapped and listed grenade ranges should be identified as UXO 1 and be investigated when the Weapons Battalion Area and any overlapping ranges close. Extensive report modification would be necessary to support this approach.

Response: The third paragraph of Section 2.0 has been modified as follows, "...although they were not at the interpreted location based on the Swearngen interview. ***The location of the grenade range described in the ASR by Mr. Swearngen, and subsequently named UXO 1, was misinterpreted in the ASR. The described grenade range is now suspected to have been the Rifle Grenade Range, the Hand Grenade Court, or the Hand Grenade Practice Area, but it is not known which of these areas was being referenced. Plate 3 of the ASR identifies location A as the Khe Sanh Range, operational from 1941 to 1999; the 1,000 Yard Range, operational from 1929 to 1940; and the New Rifle Range, operational since 1918. The ASR also identifies other potential areas, including location A1 as Grenade Courts (1944), location A2 as the Day Movement Course (1998), and location A3 as the Rifle Grenade (1941). Plate 3 of the ASR is provided as Attachment 4.***

Figure 7, dated 2012, provides a more recent configuration of the Weapons & Field Training Battalion Area. Although the portions of any MMRP sites, or potential MMRP sites, within the footprints of any operational ranges or training areas are not being addressed under the MMRP at this time, these ranges and active training areas will be addressed at a later date if, or when, the ranges and training areas cease to be operational.

2. **Comment:** If modifications are made to the SI Addendum, please clarify if the modifications to the report have been made: 1) in a manner consistent with the Department of Defense (DOD) range rule, or any other applicable rules or guidance or programs; and 2) throughout the DOD, for example the Department of Defense Explosives Safety Board or the Military Munitions Response Program¹; the Marine Corps, for example Marine Corps Systems Command; the Marine Corps Recruit Depot, for example CERCLA documents and non-CERCLA documents, etc.

Response: Refer to Attachment 2 of the SI Addendum Report, the Department of Defense Explosives Safety Board (DDESB) has approved the NFA ESS; therefore, the status of UXO 1 has been **updated to NFA at DDESB and this recommendation has been forwarded to Marine Corps Systems Command to update their records as well**. Once the SI Addendum Report is approved, it will be submitted to NIRIS, and site boundaries will be updated in the facility GIS. The boundary of the Weapons **& Field Training** Battalion Area is already within the facility GIS. Inconsistencies of site boundaries on the Military Munitions Response Program website will ultimately be updated.

Regarding the footnote, the Navy has identified the appropriate resources to update the DENIX website and will work towards that upon finalization of this NFA.

3. **Comment:** Acronyms throughout the document, including attachments, are either not defined or used and defined inconsistently. For example, ASR as “Archive Search Report” versus “Archives Search Report”, EOD as “Explosives Ordnance Disposal” versus “Explosive Ordnance Disposal”, etc. Please note for future documents. No changes necessary.

Response: The comment is acknowledged and acronyms will be defined consistently in future documents. The acronyms will be updated in the SI Report Addendum for UXO 1 No Further Action; however, Attachment 1, the NFA ESS, has been finalized and approved by DDESB; therefore, revisions will not be made to this document.

4. **Comment:** Figures referenced in the document are not accurately referenced, i.e. “Figures 4 through 6”. Figure 5 does not contain the identified grenade courts but was included in the grenade court figure reference. Figure 7 does include the grenade courts but was not in the grenade court figure reference. Please correct all figure references throughout the document.

Response: The first sentence of the fifth paragraph of Section 2.0 has been revised, “Considering the available historical documentation, it is likely that the location of the grenade range described by Mr. Swearngen was misinterpreted in the ASR and that it actually coincides with either the rifle grenade range, hand grenade court, or hand grenade practice area shown on Figures 4, **6, and 7**.”

5. **Comment:** References are assumed to be readily available to the public, however, the ASR and RIPRA are not. Please clarify how this will be addressed in the administrative file which is intended to be a public record.

Note: In future documents if references are not publically available, arrangements should be made with EPA to access the documents to assist in expediting the review.

Response: The ASR and RIPRA have been submitted to NIRIS **and the Administrative Record, which means that they will be available to the public and will appear on the public web page**.

1. Note: See inconsistent map on MMRP website i.e. UXO1 mislocated, UXO4a missing, UXO4 boundaries inconsistent with current CERCLA submittals, UXO 5 boundary includes the Grenade Range which has been excluded in CERCLA documents, etc.