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MCRD PARRIS ISLAND
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LETTER AND THE U S EPA REGION IV APPROVAL OF THE DRAFT FINAL SITE
INSPECTION REPORT ADDENDUM FOR ORDNANCE EXPLODED 1 (UXO 1) AND NO
FURTHER ACTION DETERMINATION MCRD PARRIS ISLAND SC

04/25/2016

U S EPA REGION IV ATLANTA GA



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

April 25, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ATTN: Jose Parra, Bldg Z-140, Room 104
Commanding Officer
NAVFAC MIDLANT
9324 Virginia Ave
Norfolk, VA 23511-3095

AND

Commanding General
NREAO
ATTN: Ms. Lisa Donohoe
PO Box 5028
Parris Island, SC 29905

Dear Mr. Parra and Ms. Donohoe:

The U.S. Environmental Protection Agency has completed review of the Draft Final Site Inspection Report Addendum for UXO 1 No Further Action Determination at Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (December 2015) and the subsequent formal request for concurrence with No Further Action (NFA) determination (April 2016).

EPA understands the following from the Navy's report:

"The Draft SI Report recommended no further action for UXO 1. However, upon review by the Navy Munitions Response Site Prioritization Protocol Quality Assurance (MRSPP QA) panel and because of the uncertainty of the location of UXO 1, the recommendation for UXO 1 was changed to recommend further investigation at the ASR/RIPRA described location of UXO 1. In order to accomplish this task, UXO 1 was initially included in the Work Plan for Expanded Site Inspection (ESI) at UXO 2 and Rocket Range UXO 4 Subarea (Tetra Tech, 2012b). During the ESI Work Plan development, several lines of evidence were researched and additional information was obtained indicating that UXO 1 did not exist at the location shown in the ASR and RIPRA. The Navy MRSPP QA Panel reconvened to consider the lines of evidence and agreed that UXO 1 did not require further evaluation or investigation. Subsequently, an NFA Explosives Safety Submission (ESS) request, provided in Attachment 1, was submitted to the Department of Defense Explosives Safety Board (DDESB). DDESB staff reviewed the request against the requirements of Department of Defense (DoD) 6055.09-M, DoD Ammunitions and Explosives Safety Standards, and has granted approval for the NFA ESS for UXO 1 at MCRD Parris Island (DDESB, 2013). The DDESB approval letter is provided in Attachment 2. A public notice of the

NFA determination was published in The Island Packet and The Beaufort Gazette on July 31, August 1, and August 2, 2012. Copies of the affidavit and public notice are provided in Attachment 3. Further, during the April 2012 and July 2012 Partnering Team meetings, USEPA and SCDHEC agreed to consider NFA at UXO 1 pending receipt of documentation regarding an NFA decision for UXO 1 via formal correspondence from the Navy.”

Many separate DoD entities have played a role in the proposed NFA determination. EPA has relied on the information in this report and the expertise of the above mentioned DoD entities. If at any point there is new information obtained by any of these entities that draws into question this NFA determination, EPA expects to be notified by the Navy/MCRD immediately. Based on the review of this report and the information and decisions made by all DoD entities mentioned above, EPA approves the No Further Action determination made by the Navy.

Furthermore, EPA understands the following from the Navy’s report:

“A rifle grenade range, hand grenade court, and hand grenade practice area did exist during this time period, as shown on the ASR figures, although they were not at the interpreted location based on the Swearengen interview. The location of the grenade range described in the ASR by Mr. Swearengen, 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 the 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.”

EPA understands these other grenade areas referenced in the report are still part of an active range. EPA emphasizes the Navy should track and ensure these grenade ranges are addressed as part of these other ranges, once the ranges are closed and will no longer be used as ranges, in accordance with CERCLA and relevant EPA guidance.

EPA has implemented the change pages according to instructions in the April 2016 letter. EPA looks forward to submittal of the final CD version of the documents.

If you have any questions regarding this matter or need any additional information, please contact me at (404) 562-9969.

Sincerely,

LILA LLAMAS

Digitally signed by LILA LLAMAS
DN: cn=US, o=U.S. Government, ou=USEPA, ou=Staff,
c=LILA LLAMAS, dnQualifier=0000007018
Date: 2016.04.25 18:55:19 -04'00'

Lila Llamas, Senior RPM
Restoration and DOD Coordination Section
Site Restoration and Sustainability Branch
Superfund Division

cc: Mr. Tim Harrington, MCRD
Ms. Meredith Amick, SCDHEC