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MCRD PARRIS ISLAND  
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NOTICE OF INADEQUACY AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT FINAL REMEDIAL INVESTIGATION  
WORK PLAN FOR SITE 1 INCINERATOR LANDFILL AND SITE 41 FORMER INCINERATOR  
MCRD PARRIS ISLAND SC  
7/18/1997  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street  
Columbia, SC 29201-1708

CERTIFIED

July 18, 1997

Commanding General, MCRD  
ATTN.: I&L ERR (NREAO)  
P.O. Box 19001  
Parris Island, SC 29905-9001

RE: Notice of Technical Inadequacy  
Review of document titled: DRAFT Final Remedial Investigation Work Plan  
Site 1/41 - Incinerator Landfill and Former Incinerator, dated July, 1997  
Marine Corps Recruit Depot (MCRD)  
Parris Island, South Carolina  
SC6 170 022 767

Dear Commanding General:

The Hazardous Waste Permitting Section and the Hydrogeology Section of the South Department of Health and Environmental Control (Department) have reviewed the above referenced document. The document has been reviewed with respect to a RCRA Facility Investigation Work Plan, the requirements of the South Carolina Hazardous Waste Management Regulations, R.61-79, the RCRA Facility Investigation Guidance document (EPA-530/SW-89-031) and EPA Region IV Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (SOP/QAM), dated May 1996.

Due to certain changes in the sampling strategy and information obtained during the July 7, 1997 Federal Facilities Agreement meeting, the Department has determined that the above referenced Work Plan is technically inadequate. The Final Work Plan should incorporate the attached comments. The responses to comments may be in the form of a revised Work Plan or revised pages to be inserted into the July, 1997 document.

Please contact me at (803) 896-4182 or Don Hargrove at (803) 896-4133 if you have any questions.

Sincerely,

Susan C. Peterson, Environmental Engineer Associate  
Corrective Action Engineering Section  
Bureau of Land & Waste Management

## Attachments

cc: Don Hargrove, Hydrogeology  
Russell Berry, SCDHEC-Low Country EQC  
Allison Humphris, USEPA Region IV  
Art Sanford, Southern Division  
Mark Speranza, Brown & Root Environmental  
Glenn Wagner, Brown & Root Environmental  
Jody Laprade, Galileo

Notice of Technical Inadequacy

Review of document titled: Draft Final Remedial Investigation Work Plan

Site 1/41 - Incinerator Landfill and Former Incinerator, dated July, 1997

Marine Corps Recruit Depot

Parris Island, South Carolina

SC6 170 022 767

Comments

1. Please modify the title of this work plan to include RCRA terminology. As known, understood, and accepted by the MCRD Tier I technical and Tier II teams, the State of South Carolina has authorization under the Hazardous & Solid Waste Amendment to implement correction action activities.

The Department reviewed this document to meet the requirements of an RCRA Facility Investigation (RFI) Work Plan. The Department is willing to recognize the following dually-titled document:

Draft Final RCRA Facility Investigation/Draft Final Remedial Investigation Work Plan  
for

SWMU/Site 1 - Incinerator Landfill and  
SWMU/Site 41 - Former Incinerator

or

Draft Final  
RCRA Facility Investigation/Remedial Investigation Work Plan  
for

SWMU/Site 1 - Incinerator Landfill and  
SWMU/Site 41 - Former Incinerator

Marine Corps Recruit Depot  
Parris Island, South Carolina  
SC6 170 022 762

2. According to the Region IV RFI Work Plan Checklist, prepared by A.T. Kearney, dated 1989, an EPA I.D. No. should be included on the cover page. The EPA I.D. No. for MCRD Parris Island is SC6 170 022 762. Please include that I.D. number on the Final Work Plan.



2600 Bull Street  
Columbia, SC 29201-1708

## MEMORANDUM

**TO:** Susan Peterson, Engineering Associate  
Hazardous Waste Permitting Section  
Division of Hazardous and Infectious Waste Management  
Bureau of Land and Waste Management

**FROM:** Donald C. Hargrove, Hydrogeologist   
Hazardous Waste Section  
Division of Hydrogeology  
Bureau of Land and Waste Management

**DATE:** 8 July 1997

**RE:** Parris Island Marine Corps Recruit Depot (MCRD)  
Parris Island, South Carolina  
Beaufort County  
SC6 170 022 767

Remedial Investigation Work Plan for Site 1 - Incinerator Landfill and  
Site 41 - Former Incinerator (dated July 1997)

The Division of Hydrogeology has reviewed the revised Remedial Investigation Work Plan for Site 1 - Incinerator Landfill and Site 41 - Former Incinerator at MCRD. This work plan (dated July 1997) was received on 1 July 1997. It provides a physical description of Site 1 and Site 41 that includes the history of these two sites. It briefly describes previous studies performed at these sites and indicates that the previous studies have data gaps. This work plan also proposes a sample strategy to fill the data gaps in order to fully characterize the nature and extent of contamination. This work plan addresses comments from the U.S. EPA Region IV, SCDHEC Hazardous Waste Permitting Section and the SCDHEC Division of Hydrogeology after review of the DRAFT version of this work plan that was reviewed on 15 November 1996.

This document was reviewed with respect to R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents. Based on this review, this reviewer finds that MCRD has not adequately addressed the comments made by the Division of Hydrogeology (memo: Hargrove to Tapia, 15 November 1996). The following comments should be addressed and a revised document submitted:

- 1) The title should reflect whether this document is a DRAFT or a FINAL document. Please revise.

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- 2) **Response to Comments:** Only the comments concerning the DRAFT version of this document should be included in this section. The Division of Hydrogeology understands that some comments made on other work plans have been incorporated into this document due to comparable applicability. Any additional comments that have been incorporated into this document should be included at the end of this section. Please revise.

If you have any questions regarding these comments, please call me at (803)896-4033.