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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 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC  
7/18/1997  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

03.01.00.0027



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 3 - Causeway Landfill, 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 3 - Causeway Landfill, 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 3 - Causeway Landfill

or

Draft Final  
RCRA Facility Investigation/Remedial Investigation Work Plan  
for  
SWMU/Site 3 - Causeway Landfill

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 3 - Causeway Landfill  
(dated July 1997)

The Division of Hydrogeology has reviewed the revised Remedial Investigation Work Plan for Site 3 - Causeway Landfill at MCRD. This work plan (dated July 1997) was received on 2 July 1997. It provides a physical description of Site 3 that includes the history of this site. It briefly describes previous studies performed at this site 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 20 February 1997.

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 Peterson, 20 February 1997). 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.

DD970699.DCH

- 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.
- 3) **Response to Comment #3:** This response clarifies that the groundwater risk assessment will be performed according to CERCLA requirements. However, compliance with the State Primary Drinking Water Standards has not been specified. According to the National Oil and Hazardous Substances Contingency Plan (NCP), remedial alternatives should be evaluated against NCP threshold criteria for overall protection of human health, and compliance with applicable or relevant and appropriate requirements (ARARs). The State Primary Drinking Water Standards are ARARs and must be followed. This comment does not require a specific revision. This is for future reference to be acknowledged in the resulting report.
- 4) **Response to Comment #4:**
  - a) This response should reference the response to Comment #3 (not #2).
  - b) See Comment 3 (above).

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