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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES
COMMENTS ON DRAFT FINAL MASTER WORK PLAN VOLUMES 1, 2 AND 3 OF 3 MCRD
PARRIS ISLAND SC
1/2/1998
SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES

03.01.00.0039

South Carolina Department of Natural Resources



Paul A. Sandifer, Ph.D.
Director
John V. Miglarese
Deputy Director for
Marine Resources

January 2, 1998

Mr. Mark P. Speranza
Brown & Root Environmental
Foster Plaza VII
661 Anderson Dr.
Pittsburgh, PA 15220-2745

RE: Draft Final Master Work Plan,
Volumes I, II, and III;
MCRD Parris Island;
Beaufort County, S.C.

Dear Mr. Speranza:

Personnel with the S.C. Department of Natural Resources (SCDNR) have reviewed the above referenced documents and offer the following comments.

General Comments - As you know, the SCDNR was only recently invited to review documents and participate in discussions related to the investigation and remediation of contaminated sites at the Parris Island Marine Corps Recruit Depot (MCRD). As stated in the Master Work Plan (MWP), the MCRD was placed on the National Priorities List in January, 1995, and since that time a Partnering Team consisting of representatives from the Navy, USEPA, and SCDHEC have made recommendations for future action at the site based on previous investigations. These recommendations are summarized in Section 1 of both Volumes I and III of the MWP.

The SCDNR is concerned that some Solid Waste Management Units (SWMUs) immediately adjacent to estuarine areas have been recommended for No Further Action, or only limited investigation, based upon what may be insufficient information regarding the nature and extent of contamination at these sites. Each of these sites is discussed below:

Site 13/SWMU 11: Inert Disposal Area A and Site 13/SWMU 12: Inert Disposal Area B - SWMU 11 is located on the south side of Horse Island adjacent to Ribbon Creek, and SWMU 12 is located near Elliott's Beach in the southeast section of the depot. The latter site is also within the boundary of a State Shellfish Ground (SSG-064) that is periodically open to commercial and recreational shellfish harvesting. The rationale given

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in the MWP (Volume I, Section 1.5.2) for the recommendation of No Further Action at both sites is that each was a "state-controlled domestic landfill". Does this imply that precautions were taken to ensure that no hazardous materials were disposed of in these unlined landfills, or that sampling of soils, groundwater, sediments, and surface water adjacent to these sites revealed no off-site migration of any contaminants that might have been disposed of in these landfills? If so, this should be clarified in the text of the MWP. If no such evidence exists, the SCDNR recommends that the Partnering Team reconsider these sites for further investigation of possible off-site migration of contaminants into adjacent estuarine habitats.

Site 15/SWMU 15: Dirt Roads - As stated in the site-specific workplan for Sites 2 and 15 (which the SCDNR will review and comment on separately from the MWP), waste oil, cutting oil, petroleum-based solvents, hydraulic fluids, and water-based coolants had been sprayed on dirt roads throughout the MCRD for dust suppression from 1918 until 1966. The SCDNR is concerned that the investigation of dirt roads will be limited to those roads accessing the Borrow Pit Landfill (Site 2/SWMU 2) and Inert Disposal Area B (Site 13/SWMU 12). It appears from the MWP site map (Volume I, Figure 1-2) that there is at least one other road (ending near an unnamed creek south of Elliott's Beach, and within the SSG referred to above) that may be a continuing source of contamination to intertidal marsh or creek habitat. The SCDNR recommends that the Partnering Team reconsider including this, and any other dirt roads adjacent to estuarine habitat, for further investigation of possible off-site migration of contaminants.

Specific Comments - The SCDNR concurs with all comments on Volume III, Appendix B of the MWP (Ecological Risk Assessment Methodology) made by NOAA's Coastal Resource Coordinator in his memorandum dated 12/17/97. In addition, we have the following specific comments on other sections of the MWP:

(volume, page, paragraph, line)

(I, 1-21, 8, 4) The dirt road accessing Elliot's Beach is not "near Site2/SWMU 2" as stated.

(I, 2-28, 2, 3) Include appropriate species of sea turtles among those "threatened or endangered animal species ...known to occur in or around the Depot."

(II, Section 3.0 and Appendix B) **General Sampling Operations and Standard Operating Procedures for Tissue Sampling should be added.**

(II, Appendix B.1, SA-1.2) Even-numbered pages (2,4,6,8, and 10) are missing.

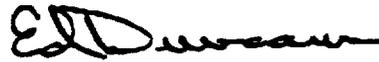
(III, A-2, 4, 5 and 6) The removal of "unusable" groundwater from an assessment of human health risk would seem to be inappropriate, if it is demonstrated that there is a connection between any such groundwater and surface waters that are used for primary and secondary recreation.

(III, A-9, 4, 1 through 5) Include "shellfish" in this discussion.

(III, A-18, 3, 3 and Figure A-2) Adolescent and child recreational users should also be considered as potential receptors at specific sites; in Figure A-2, "ingestion of finfish/shellfish" should also be considered as a potential exposure route for "offsite residents" and "adolescent trespassers".

We hope you find these comments helpful. If you have any questions, please contact Priscilla Wendt, the SCDNR project manager for this site, at 803-762-5068.

Sincerely,



Robert E. Duncan
Environmental Programs Director

cc: Timothy J. Harrington, MCRD Parris Island
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