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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES
COMMENTS ON RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION/REMEDIATION INVESTIGATION WORK PLAN FOR SITE 2 AND SITE 15
MCRD PARRIS ISLAND SC
1/5/1998
SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES

South Carolina Department of Natural Resources



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

January 5, 1998

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

RE: RCRA Facility Investigation/
Remedial Investigation Workplan for
Site 2 - Borrow Pit Landfill and
Site 15 - Dirt Roads;
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 document and offer the following comments.

The SCDNR concurs with all comments on the site-specific workplan made by NOAA's Coastal Resource Coordinator in his memorandum dated 12/17/97. The SCDNR also requests involvement in the selection of locations for the collection of background sediment samples, and may have additional comments regarding the number and location of samples following the January 21 site visit. In addition, the SCDNR has the following comments on the site-specific workplan:

(page, paragraph, line)

- (1-1, 4, 2) Since the unlined Borrow Pit landfill is located approximately 100 ft. from the marsh immediately adjacent to Class SFH water (that portion of Archers Creek from the Parris Island Bridge to the Broad River) which, by definition, is "protected for shellfish harvesting", in addition to other forms of primary and secondary contact recreation, it would seem appropriate to include "adult, adolescent, and child recreational users" among the list of potential receptors in the human health risk assessment.

- (2-1, 3, 15) Please clarify whether or not any fill material (clean or otherwise) was used to cover the landfill after disposal activities were discontinued in 1968. If fill material was used, any information on its composition, volume, depth, or areal coverage should be included.
- (2-16, Figure 2-7) Please indicate by shading (or other graphical device) which section(s) of dirt road remain unpaved.
- (3-2, Figure 3-1) "Ribbon Creek" should be "Archers Creek".
- (5-1, 3, 8) The removal of groundwater that is "not potable" from an assessment of human health risk may 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.
- (5-2, after paragraph 2) Include "Adult, Adolescent and Child Recreational Users" as potential human receptors. Include ingestion of, and dermal contact with, sediment and surface water, and ingestion of finfish/shellfish as pathways of concern in the human health risk assessment for this group.
- (7-1, 4, 1) The SCDNR may recommend the collection of additional surface water and sediment samples in the vicinity of Elliott's Beach and the unnamed tidal creek south of Elliott's Beach, following the January 21 site visit.
- (7-10, Figure 7-5) Please indicate by shading (or other graphical device) which section(s) of dirt road remain unpaved.

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
Arthur F. Sanford, SOUTHNAVFAC
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