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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES
COMMENTS ON ADDENDUM 1 TO RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION/REMEDIATION INVESTIGATION WORK PLAN FOR SITE 1 MCRD
PARRIS ISLAND SC
11/30/1998
SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES



South Carolina Department of Natural Resources

James A. Timmerman, Jr., Ph.D.
Director
Paul A. Sandifer, Ph.D.
Deputy Director for
Marine Resources

November 30, 1998

Mr. David D. Brayack
Tetra Tech Nus, Inc.
661 Anderson Dr.
Pittsburgh, PA 15220-2745

RE: Addendum 1 to RCRA Facility Investigation/
Remedial Investigation Work Plan for
Site/SWMU 1 - Incinerator Landfill;
MCRD Parris Island;
Beaufort County, S.C.

Dear Mr. Brayack:

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

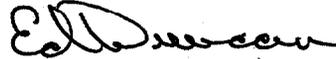
It is stated in the addendum that the maximum horizontal extent of potential sediment contamination will be determined by collecting sediments at 50-ft intervals extending outward from the high water shoreline at Site 1, and inspecting them for visual evidence of incinerator ash. It is then stated that "The samples will be collected at the first location where ash is not observed. However, the field samples for chemical testing will be collected at a minimum of 200 feet from the high water shoreline." First of all, it is unclear what the significance of the "200-ft" criterion is, and where sediments would be collected if the absence of ash suggests a horizontal extent of contamination *less* than 200 feet. This should be clarified.

Secondly, it is our understanding that, in addition to incinerator ash, this landfill received a variety of solid and liquid waste materials, including "approximately 24,000 tons of domestic waste, and most notably, 40,000 gallons of paint thinners and 2,600 gallons of still bottoms" (SWMU Data Sheet). Given the nature of the waste materials disposed in the landfill (which extends several hundred feet into the marsh) and the likely influence of tidal excursions on their redistribution, it seems entirely possible that the extent of sediment contamination could extend beyond the area within which incinerator ash is detected. The addendum should clarify how the extent of sediment contamination will be determined if exceedances of ecological screening criteria are encountered at the farthest site sampled.

Finally, with respect to the soil samples, it is unclear how the PAH data obtained from the picnic area will be used. Although the picnic area is not associated with any SWMUs or IR sites, it seems inappropriate to use PAH levels associated with road base material or dust control as background concentrations to which levels in the landfill will be compared. The intent of this sampling should be clarified. It should also be noted that the issue of sampling for dioxins and furans, as suggested by EPA, has still not been resolved, and should be discussed further at our next Partnering Team meeting.

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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Susan Peterson, SCDHEC
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Tom Dillon, NOAA
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