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MCRD PARRIS ISLAND  
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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT RESOURCE CONSERVATION AND  
RECOVERY ACT FACILITY INVESTIGATION FOR SITE 12 MCRD PARRIS ISLAND SC  
2/27/2001  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

1D 210

19.01.12.0004

February 27, 2001

Commanding Officer  
Department of the Navy  
SOUTHNAVFACENGCOM  
ATTN: Mr. Art Sanford  
2155 Eagle Drive  
North Charleston, South Carolina 29406

RE: Draft Remedial Investigation/RCRA Facility Investigation for Site 12/SWMU 10  
- Jericho Island Disposal Area (10/00)  
Marine Corp Recruit Depot  
Parris Island  
SC6 170 022 762

Dear Mr. Sanford:

The Corrective Action Engineering and the Hydrogeology Sections of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document, which was received on November 8, 2000. The Department has determined that the attached comments must be adequately addressed prior to receiving final approval.

If you have any questions or concerns, please feel free to contact Jerry Stamps at (803) 896-4285 or Don Hargrove of the Division of Hydrogeology at (803) 896-4033.

Sincerely,

Jerry Stamps, Engineer Associate  
Corrective Action Engineering Section  
Division of Hazardous and Infectious Waste Management

cc:

David Brayack, TtNUS  
Tim Harrington, MCRD Parris Island  
Don Hargrove, Hydrogeology  
Rob Pope, EPA Region IV

Priscilla Wendt, SCDNR  
Tom Dillon, NOAA

ENGINEERING COMMENTS  
prepared by Jerry Stamps  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management  
February 6, 2001

1. General

The Department agrees with the EPA concerning the development of a focused CMS. This focused CMS must evaluate, at a minimum, the removal and disposal of the waste material.

2. Section 3.2.2

It is unclear why subsurface soil samples were not analyzed for the typical investigative parameters such as VOCs, SVOCs, pesticides, etc... There are two facts to consider that would indicate the potential need for additional subsurface soil sampling such as:

- a. Landfill debris was encountered at depth at PAI-10-SB-06 and PAI-10-SB-07. Contaminants may have leached from the waste to the subsurface soils.
- b. Several subsurface soil borings (PAI-10-SB-01 and PAI-10-SB-06) had elevated PID readings indicating potential VOC contamination.

3. Section 3.2.5, Page 3-5

Please include a figure illustrating background sample locations relative to SWMU 10 (Jericho Island).

4. Figure 1-2 and Figure 3-2

Figures on a smaller scale are necessary to better identify the proximity of the sample location relative to the waste piles.

5. Section 4 Figures

The Department would like to commend the author for incorporating the applicable screening levels onto these figures. By doing so, the reviewer can easily determine the magnitude of the human health and/or ecological exceedances.

6. Section 4.2

This section states that the EPA Region 4 freshwater ecological screening values were used for comparison purposes based upon the assumption that the groundwater would eventually become surface water. However, Section 7.3.1 states that the EPA Region 4 saltwater ecological values would be used for screening based upon the elevated salinity in both the surface water and groundwater. Please revise accordingly.

7. Figure 4-1

It does not appear as though soil samples were collected within the vicinity of the inland waste piles; particularly the northern-most waste pile. Please explain.

8. Figure 4-1

Soil sample PAI-10-SS-05-01 appears to have elevated concentrations of PAHs; however, there is not a waste pile within the vicinity of this sample. Please attempt to explain the source of this contamination.

9. Figures 4-3 and 4-5

There does not appear to be a correlation between the surface water and sediment samples to the east side of the site. The surface water samples have consistently elevated detections of metals, particularly manganese. However, the corresponding sediment samples do not have any exceedances; thereby, eliminating elevated turbidity as an explanation. Please attempt to explain the source of the elevated metals in the surface water.

10. Section 6.2.3.3, Page 6-10; Figure 6-2; Table 6-13

Section 6.2.3.3 states that the ingestion of groundwater will be considered a pathway. This is confirmed in Table 6-13 for the child resident, adult resident, and lifelong resident. However, the CSM provided in Figure 6-2 does not indicate this exposure route for the onsite resident. Please revise accordingly.