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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES
COMMENTS ON REMEDIAL INVESTIGATION/RESOURCE CONSERVATION AND
RECOVERY ACT FACILITY INVESTIGATION FOR SITE 12 MCRD PARRIS ISLAND SC
3/7/2001
SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES

7803-2.1-31

File C10531
Incoming Conservation

South Carolina Department of Natural Resources



10211

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

March 7, 2001

19.01.12.0005

Commanding General
Marine Corps Recruit Depot
Attn: Timothy J. Harrington, NREAO
P.O. Box 19003
Parris Island, SC 29905-9003

RE: RI/RFI for Site 12/SWMU 10
Jericho Island Disposal Area;
MCRD Parris Island;
Beaufort County, SC

Dear Mr. Harrington:

The S.C. Department of Natural Resources (SCDNR) has reviewed the document referenced above, as well as the comments provided by NOAA (by letter dated January 8, 2001).

First of all, the SCDNR concurs with the conclusion in the Ecological Risk Summary (Section 7.10) that certain pesticides, PCBs, and inorganic contaminants pose a risk to aquatic receptors in the vicinity of sediment samples SDW-01, SDW-02, and SD-14, which are in close proximity to each other within the debris pile at the south end of Jericho Island. We concur with NOAA, however, that the "no action" recommendation for sediments other than SDW-01 and SDW-02 (also referred to as PI-012-01 (35) PI-012-02 (36), respectively) should be omitted from Section 8.0, Conclusion 10.0. Remedial action in the vicinity of SD-14 should be considered in the FS/CMS, as well.

Secondly, the SCDNR concurs with the conclusion in the Ecological Risk Summary that several inorganic contaminants pose a risk to terrestrial receptors in the vicinity of surface soil SS-14, which is in close proximity to the three sediment samples mentioned above. We agree with NOAA, however, that remediation of PAH-contaminated soils in the vicinity of SS-08 and SS-12 should also be considered, and that the "no action" recommendation for surface soils other than SS-14 should be omitted from Section 8.0, Conclusion 9.0. Furthermore, we concur with NOAA that the apparent absence of any samples from at least one of the debris piles should be addressed in the RI/RFI.

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Page Two – Jericho Island Disposal Area

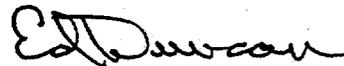
Finally, we have the following two specific comments that should be addressed:

1) The locations of soil samples SS-07-01 and SS-08-01 on Figure 3-1 are not the same as those on Figure 4-1. Identifying the correct location of SS-08-01 is particularly important, since this is where several exceedances of PAH screening values were detected.

2) In the discussion of arsenic on pages 7-35 and 7-36, the sentence at the end of the second paragraph concludes that "...arsenic should not be dropped from further consideration at Site 12"; whereas, the sentence at the end of the third paragraph concludes that "...arsenic should be dropped from further consideration." This apparent discrepancy should be corrected.

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: Dave Brayack, Tetra Tech NUS, Inc. ✓
Arthur F. Sanford, SOUTHNAVFAC
Rob Pope, USEPA Region 4
Jerry Stamps, SCDHEC
Priscilla Wendt, SCDNR
Tom Dillon, NOAA
Diane Duncan, USFWS