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MCRD PARRIS ISLAND
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U S NAVY RESPONSES TO REGULATOR COMMENTS ON DRAFT SOLID WASTE
MANAGEMENT UNIT/AREA OF CONCERN ASSESSMENT REPORT FOR AREA OF
CONCERN 54 OLD WASTEWATER TREATMENT PLANT MCRD PARRIS ISLAND SC
2/4/2003
MCRD PARRIS ISLAND

COMMENT RESPONSE SUMMARY
Old Wastewater Treatment Tank
Draft SWMU/AOC Assessment Report
Marine Corps Recruit Depot Parris Island

Reviewer/ Comment Number	Page Section Paragraph	Comment	Response
COMMENTS BY: U.S. EPA Region 4 (Robert Pope)			
Pope 1	General	Representative photographs of the site and site features should be included.	Concur. Representative site photographs provided by SC Department of Health and Environmental Conservation (Don Hargrove) will be included as an attachment to the revised SAR.
Pope 2	Section 7.0	A recommendation from the Navy regarding the need for further investigation should be included.	Concur. The Navy will determine a recommendation based on discussion with the MCRD Partnering Team.
COMMENTS BY: NOAA Coastal Protection and Restoration Division (Tom Dillon)			
Dillon 1	General	<p>Limited analytical data suggest further investigations are warranted.</p> <p>It appears that 4 liquid (or leachate) and 2 solid (or sludge) samples were taken. Sample descriptions vary between the SAR report (leachate and sludge) and Attachment 3 (liquid and solid). Terminology should be consistent throughout. Sample locations should be described more fully and/or shown on Attachment 1 Site Sketch.</p> <p>a. Both of the liquid (or leachate) samples analyzed for inorganics have elevated concentrations (e.g., lead - 61 mg/L, copper - 22 mg/L, tin - 51 mg/L, zinc - 150 mg/L, silver - 1 mg/L, cadmium - 1 mg/L, mercury - 16 µg/L). Concentrations greatly exceed EPA Region 4 ecological screening values.</p> <p>b. Both solid (or sludge) samples have elevated levels of PAH. The sum of 9-11 individual PAH varies between 32-39 mg/kg. Also detected were Dibenzofuran, 5.7-7.9 mg/kg in both solid samples and Aroclor 1242, ~ 90 µg/kg, in one of the solids samples.</p> <p>c. A significant uncertainty is the solid samples (high in PAH) were not analyzed for metals and the liquid samples (high in metals) were not analysed for PAHs.</p> <p>d. No samples were taken in the adjacent saltmarsh where the wastewater treatment tank discharged.</p>	<p>Concur. The analytical data presently available are limited to standing liquid/leachate in the tank and solid/sludge from the bottom of the tank. No data from environmental media were collected. Regarding the terminology used for the sample media, solid and liquid are derived from laboratory classification of the matrix, and leachate and sludge are derived from a general classification of sample media. The table in Attachment 3 will be revised to be consistent with the SAR.</p> <p>Concur. It is agreed that the observed metals concentrations significantly exceed EPA ESV's. Further, these concentrations may be representative of past discharges from the unit.</p> <p>Concur. It is agreed that detection of PAH, Dibenzofuran, and Aroclor 1242 in solid/sludge is noteworthy. It also should be noted that tank bottom solid/sludge normally contains the highest concentration of potential contaminants remaining at a tank unit. Additionally, only one analysis of solid/sludge exceeded EPA Region 9 residential PRGs (02-051-2 for benzo(a)pyrene).</p>

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		wastewater treatment tank discharged.	Concur. It is agreed that the saltmarsh discharge area is uncharacterized.
Dillon 2	General	<p>Other Comments on the SAR</p> <p>a. Under §5.0 (Release Information), biota should be included as "Potentially Impacted Media" along with soil, sediment and ground water. If the observation of no "stressed vegetation" was not made by a trained botanist/biologist experienced in site investigations, this characterization should be deleted. Moreover, this observation is generally not a good measure of "Potentially Impacted Media".</p> <p>b. Under §6.0 (Sampling and Testing Summary), "Two samples collected for each media" appears inconsistent with the description of 4 "Leachate" samples and 2 "Sludge" samples.</p> <p>c. Under §7.0 (Conclusions and Recommendations), leave the "Evidence of Release/Environmental Impact Identified" unmarked as no evidence has been generated either confirming or ruling out environmental impacts.</p> <p>d. The report should be dated.</p>	<p>Concur. Biota will be added as a potentially impacted media, and the observed notation of "no stressed vegetation" will be deleted.</p> <p>Concur. It is agreed that the sample identification for liquid/leachate samples is confusing. A total of four uniquely identified samples of liquid/leachate samples were collected, but this is due to collection of separately identified samples for VOC (8260B) analysis. Only two samples were collected for each analytical suite. This will be footnoted on Attachment 3 for clarification.</p> <p>Please see response to EPA comment "Pope 2".</p> <p>Concur. Subsequent revisions of the SAR will be dated.</p>
COMMENTS BY: SC Department of Natural Resources (Priscilla Wendt)			
Wendt 1	Section 3.0	Qualitative observations of rainwater retention for an unspecified period of time, do not provide definitive evidence of tank integrity. Quantitative data should be presented to support this conclusion, or, in the absence of any such data, the integrity of the tank should be investigated more fully.	Concur in part. It is agreed that the observation of retained rainwater provides only anecdotal or suggestive evidence of tank integrity. However, this evidence should be considered when designing any confirmatory sampling following tank demolition. The need for quantitative tank integrity testing should be balanced against the type and extent of confirmatory sampling.
Wendt 2	Section 4.0	The documented storage of five waste-oil drums in the empty tank, for "an indeterminate period" after the tank was taken out of service, suggests that "Petroleum" should be included	Concur. Any future sampling should include analysis for petroleum constituents.

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Wendt 3	Section 5.0	in the checklist of "Type(s) of Waste Managed at the Unit". Since the tank formerly discharged directly to the adjacent saltmarsh, both "Surface Water" and "Biota" should be included among the "Potentially Impacted Media".	Concur in part. Biota will be added as a potentially impacted media, but surface water impact should be evaluated only if sediment impacts are identified. It is considered unlikely that ongoing surface water impacts would be present due to the age of the release unless gross sediment contamination is identified.
COMMENTS BY: NAVFACENGCOR SouthDiv (Theresa Jones)			
Jones 1	Section 3.0 Type/Materials of Construction	This section mentions that the "throughgoing piping (subsequently plugged) and appurtenances appear to Be cast in during construction." What exactly are the appurtenances mentioned (is the discharge included)? If not, what is the composition of the discharge pipe?	The reference to appurtenances is meant to encompass piping access/cleanouts, manholes, and the discharge line. The reference to appurtenances can be changed to "piping related structures" to clarify the reference. The composition of the discharge pipe was not determined during the assessment.
Jones 2	Section 6.0	It would be helpful to have a more precise description about where and how each of the samples was collected. For example, were the sludge samples composites or grab samples? How deep is the sludge and were there any differences noted in the sludge between chambers? If so, which areas were sampled? Were the leachate samples taken from the discharge pipe itself or from within the tank?	Clarification of the sampling methods and locations will be included in the revised SAR. All samples were reportedly collected from within the tank.