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EMAIL OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT POST-INTERIM CONSTRUCTION
RISK ASSESSMENT FOR SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC
5/20/2003
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Sladic, Mark

From: Stacey French [FRENCHSL@dhec.sc.gov]
Sent: Tuesday, May 20, 2003 8:10 AM
To: ROBERTTKRAEMER@cs.com; Don Hargrove; David M. Scaturo;
jonesta@efdsouth.navfac.navy.mil; sanfordaf@efdsouth.navfac.navy.mil;
Pope.Robert@epamail.epa.gov; diane.duncan@fws.gov; harringtontj@mcrdpi.usmc.mil;
wendtp@mrd.dnr.state.sc.us; Tom.Dillon@noaa.gov; mmcrae@parallaxnet.com; Sladic, Mark
Cc: Stacey French
Subject: SWMU 3 Sediment Tech memo

I've attached an electronic copy of the Department's comments to the SWMU 3 Sediment Tech memo.

Please let me know if you have any questions.

Thanks

Stacey

Stacey French
DoD Site Coordinator
SC DHEC
803-896-4255

August 23, 2002

Mr. Timothy Harrington
Marine Corps Recruit Depot
P.O. Box 19003
Beaufort, SC 29905

RE: Notice of Technical Inadequacy (NOTI) – Technical Memorandum
Draft Post-Interim Construction Risk Assessment
Site/SWMU 3, Causeway Landfill (May 2002)
Marine Corps Recruit Depot, Parris Island
SC6 170 022 762

Dear Mr. Harrington:

The South Carolina Department of Health and Environmental Control (Department) received the above referenced Technical Memorandum Post-Interim Construction Risk Assessment for Site/SWMU 3 on May 16, 2002. The Department has reviewed the document with respect to the South Carolina Hazardous Waste Management Regulations (SCHWMR) and applicable guidance. Based on this review, the Department finds this document to be technically inadequate. Please refer to the attached memoranda prepared by Donald Hargrove and Susan Byrd. The Department requires that the attached comments be completely and adequately addressed and a revised document be resubmitted for review.

If you have any questions regarding this issue, please contact me at (803) 896-4185 or Donald Hargrove at (803) 896-4033.

Sincerely,

David Scaturo, P.E., P.G.
Manager, Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

Attachment: Memorandum from Donald Hargrove to David Scaturo
Attachment: Memorandum from Susan Byrd to David Scaturo

cc: Donald Hargrove, Hydrogeology
Robert Pope, EPA Region 4
Art Sanford, SOUTHDIV NAVFAC
Roger Stevens, Low Country EQC District

MEMORANDUM

TO: David Scaturo, P.E., P.G., Manager
Corrective Action Engineering Section
Division of Hazardous and Infectious Waste Management
Bureau of Land and Waste Management

FROM: Donald C. Hargrove, Hydrogeologist
RCRA Hydrogeology Section I
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 22 August 2002

RE: Parris Island Marine Corps Recruit Depot (MCRD)
Parris Island, South Carolina
Beaufort County
SC6 170 022 762

DRAFT Post-Interim Construction Risk Assessment, Site/SWMU 3-Causeway
Landfill
(May 2002)

The Division of Hydrogeology has reviewed the Document listed above. This document (dated 15 May 2002) was received on 16 May 2002. It describes the sediment sampling that took place subsequent to the Interim Corrective Measure that was implemented to address environmental concerns at SWMU-3. It presents the analytical results of this sampling effort, along with the associated risk assessment. This document also reports on the construction of the monitoring wells intended to replace the previous wells that were abandoned during the Interim Corrective Measure.

This document was reviewed with respect to R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents. Based on this review, the Division of Hydrogeology finds that this document is technically inadequate. The following comments should be addressed, and a revised document should be resubmitted for review:

- 1) Signature Page: The FINAL version of this document must be signed and stamped by a South Carolina Registered Professional Geologist (P.G.). This document presents aquifer characteristic analyses, and as such, a PG stamp is required.

- 2) Section 3.0, Sampling Activities: The last sentence on page 2 contains a typographic error...“scoped” should be “scooped.”
- 3) Section 6.0, Conclusions and Recommendations, conclusion 4.0: This section concludes that pesticide levels will decrease over time due to biodegradation. However, this assumption is never presented or discussed in this document. This document should be revised to include a detailed analysis of how biodegradation will take place for each pesticide found at SWMU-3. Discussion on biodegradation rates, and the expected timetable specific for both the pesticides and the local conditions at SWMU-3 should also be presented.
- 4) Figures: Neither of the figures included in this document show the locations of the newly installed monitoring wells. These figures should be revised, or an additional figure added, to show the locations of the newly installed monitoring wells as well as the locations of the abandoned wells.
- 5) Appendix E, Field Forms:
 - a) Table of Contents: This table should be revised to list the Monitoring Well Completion Forms that are included in Appendix E.3.
 - b) Appendix E.1, MW Construction Summary Tables: The reference point elevations for each well should be presented in the appropriate field on this table.
 - c) Appendix E.3, Monitoring Well Construction Details:
 - 1) The figure on each well completion diagram should be revised to reflect the type of well completion that was used (flush-mount in these cases).
 - 2) The filter pack for PAI 03 MW 02 DR is not the correct filter pack for a 0.020” slot screen. Please provide justification for using this filter pack.
 - d) Appendix E.4, Monitoring Well Development Records: All of the fields should be completed for each measurement interval. Please revise the forms to include all of this information.

If you have any questions regarding these comments, please call me at (803) 896-4033.

MEMORANDUM

TO: David Scaturro, P.E., P.G.
Corrective Action Engineering Section Manager
Division of Waste Management
Bureau of Land and Waste Management

FROM: Susan K. Byrd, Risk Assessor
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: July 10, 2002

RE: Marine Corp Recruit Depot
Parris Island, South Carolina

Document:
Technical Memorandum
Post-Interim Construction Risk Assessment
Site/SWMU 3-Causeway Landfill

The above referenced document by Tetrattech NUS, Inc. has been reviewed. The Department has the following risk related comments:

GENERAL COMMENTS:

1. COPEC refinement/elimination is based primarily on the use of "typical facility-wide background concentrations". Please provide information regarding the locations of the background samples, the sample type i.e. surface soil, subsurface soil, sediment, and a brief description of the soil type. Please keep in mind that since MCRD does not currently have an approved background study, the samples used for background comparison in this investigation may not be of a comparable nature to the samples collected at Site/SWMU 3.

SPECIFIC COMMENTS:

1. Section 5.3.2.1., Marsh South of the Causeway, Page 11, Paragraph 2: The text discusses elevated concentrations of DDT and alpha-chlordane that could pose potential risk to benthic receptors; however the risk seems to be disregarded as not being related to landfill activities. Due to the unlimited types of wastes that are deposited in landfills and

the fact that pesticides have been detected along the entire extent of the causeway, this argument is not valid. Additional background information regarding base-wide pesticide concentrations in sediment is necessary to support this statement.

2. Section 5.3.2.2, *Sediment Area 1*, Paragraph 4, Page 13 : The last sentence of the paragraph states that the potential risks from mercury to small fish represented by the mummichog are also probably minor. Please provide more information in the text to support this conclusion. The text should emphasize in the summary that the maximum concentration of mercury detected in sediments at Area 1 is only slightly exceeding the Region IV ESV.
3. Section 6.0, *Conclusions and Recommendations*, #3, Bullet 3, Page 18 : No site/SWMU recommendations are provided in this section. Based on the conclusions provided, please present MCRD risk management decision regarding the elevated HQ values posed by pesticide concentrations, especially the detection of DDD at 58 ug/kg at PAI-03-SD-59.

If you need any further information, feel free to contact me at (803) 896-4188.