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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 U S NAVY RESPONSE TO COMMENTS ON  
DRAFT FIVE YEAR REVIEW MCRD PARRIS ISLAND SC (PUBLIC DOCUMENT)

7/14/2005

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

*Promoting and protecting the health of the public and the environment.*

7/14/2005

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

RE: Five-Year Review Report (6/05)  
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 via email on June 24, 2005. The Department has determined that the attached comments must be adequately addressed prior to receiving a final determination regarding the above referenced document.

If you have any questions or concerns, please feel free to contact me 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 Waste Management

Attachment:

Memorandum from Don Hargrove to Jerry Stamps dated July 14, 2005

cc:

Mark Sladic, TtNUS  
Tim Harrington, MCRD Parris Island  
Don Hargrove, Hydrogeology  
Lila Llamas, EPA Region IV

Priscilla Wendt, SCDNR  
Tom Dillon, NOAA

ENGINEERING COMMENTS  
Prepared by Jerry Stamps  
Charleston Naval Complex (CNC)  
July 11, 2005

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1.     General  
The Department agrees with the comments from the EPA, dated July 8, 2005, regarding the Five Year Review Report.
2.     Summary Form, Issues  
This section should specifically discuss how "inter-base notification and communication regarding the LUC" will be improved.
3.     Summary Form, Protectiveness Statement(s)  
The Department does not agree that remedy for SWMU 3, and perhaps other sites with LUCs selected as part of the remedy, is necessarily protective of human health and the environment. Considering the LUC violations that have occurred recently, it is apparent that the current system of maintaining LUCs is ineffective. Changes must be made to ensure that LUCs are adequately maintained before such a determination is made.
4.     Section 1.0, 1<sup>st</sup> paragraph  
Please identify OU1 by its SWMU designation as well.
5.     Section 1.0, 2<sup>nd</sup> paragraph  
Please reference OSWER Directive 9355.7-03B-P "Comprehensive Five-Year Review Guidance".
6.     Section 1.0, 7<sup>th</sup> paragraph  
The Department recommends referencing the Federal Facilities Agreement (FFA) for the list of sites at MCRD.
7.     Section 1.0, last paragraph, Typo  
Remove "be" from this sentence.
8.     Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 1<sup>st</sup> par.  
Given the land use control violations which recently occurred with regard to SWMU 3, all internal policies and procedures must be reviewed and revised as necessary to ensure proper communication of land use controls to all parties that may be involved in activities which may alter the effectiveness of the remedy. Additional actions such as placing signs on property with land use controls may be necessary.

9. Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 2<sup>nd</sup> par.

The text accurately states that the Long Term Monitoring Work Plan for SWMU 1 is currently under review. The Department has not completed the review as of the date of these comments.

10. Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 3<sup>rd</sup> par.

The language in this paragraph is somewhat confusing. The Department recommends the following change to the second sentence of the 3<sup>rd</sup> paragraph: "Sediment concentrations exceeding RGOs were identified at the south-western...."

Additionally, the Department recommends the following change to the last sentence of the 3<sup>rd</sup> paragraph: "Therefore, the EPA and SCDHEC agreed to terminate the sediment excavation provided...". These are just suggested changes. Variations of these suggested changes may be acceptable.

11. Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 4<sup>th</sup> par.

The text should clarify if the O&M costs presented include the costs associated with the maintenance of land use controls.

12. Section 4.0, Site 3, 1<sup>st</sup> par

The text should clarify that the Department approved the IROD as an Interim Measure under the RCRA program.

13. Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 1<sup>st</sup> par.

Please see comment #8.

14. Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 4<sup>th</sup> par.

The text should clarify if the O&M costs presented include the costs associated with the maintenance of land use controls.

15. Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 5<sup>th</sup> par.

The letter explaining the land use control violation at SWMU 3 has yet to be received by the Department. This letter must be submitted explaining in detail the communication failure, which resulted in the land use control violation. This letter must also state what changes are planned to prevent a reoccurrence of this type of incident. As stated in the EPA's comments, such planned changes must be detailed in this five-year review report as well.

16. Section 4.0, Site 12

The selected cleanup goals for each site should be included in the five-year review as well as a brief discussion of any exceedances of such goals. Such information is crucial in evaluating the effectiveness of the remedy.

17. Section 6.0, 3<sup>rd</sup> paragraph  
This paragraph seems to imply that public comments were solicited via public notice. The Department is not aware of a public comment period. Perhaps this paragraph should clarify that the document was available to the public via the Freedom of Information Act.
18. Section 6.0, Interviews  
At a minimum, interviews should have been conducted with those personnel involved in the violation of the land use controls on SWMU 3. If this was done, please document the interview in this report.
19. Section 7.0, Page 15, 3<sup>rd</sup> paragraph  
The Department disagrees that the LUCs are functioning properly for SWMU 3. Please see comment # 3.
20. Section 7.0, Page 15, 6<sup>th</sup> paragraph  
According to this paragraph the results of LUC inspections will be reported annually once the remedies have been formally adopted. However, in the interim it should be stated how the results of these quarterly visual inspections and reviews will be transmitted to the Department and the EPA. Furthermore, any noted violations of the LUCs must be reported to the Department and the EPA immediately, rather than waiting until the annual report is to be submitted.
21. Section 9.0  
This report includes brief descriptions of Sites 12 and 45. The Department anticipates additional details regarding these and all other sites for which a remedy will be selected in the next five-year review report.
22. Section 10  
Please see comment #3.



2600 Bull Street  
Columbia, SC 29201-1708

## MEMORANDUM

TO: Jerry Stamps, Engineering Associate  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

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

DATE: 14 July 2005

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

DRAFT Five-Year Review Report  
(June 2005)

The Division of Hydrogeology has reviewed the Document listed above. This document, dated 24 June 2005) was received electronically on 24 June 2005. It provides a physical description of various Solid Waste Management Units (SWMUs) at MCRD, which includes the history of these SWMUs and the history of MCRD. It briefly describes remedial activities performed at various SWMUs, and describes the current conditions of the SWMUs, as they pertain to the selected remedies.

This document was reviewed with respect to R.61-79 of the South Carolina Well Standards, R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents.

Based on this review, the Division of Hydrogeology has determined that the following comments should be addressed:

- 1) Five-Year Review Summary Form, Page F-1: The Site name should be revised from "Parris Island Marine Corps Reserve Depot" to Parris Island Marine Corps Recruit Depot.
- 2) Site 12, Page 11, Third paragraph, third sentence: This sentence should be revised where it states "The RGOs are **substantially** the same as developed for Site 1 and Site 3." It is

suggested that **substantially** be replaced with **essentially**.

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