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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
SITE INSPECTION REPORT FOR SITES 4, 5, 7, 9, 13, 16, 27 AND 35 MCRD PARRIS
ISLAND SC
3/15/2006
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

March 15, 2006

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

RE: Summary of SCDHEC Comments and Responses to Date for SI/CS Sites at MCRD Parris Island

Site Inspection/Confirmation Sampling Report for Site/SWMU 4, Site/SWMU 5, Site/SWMU 7, Site 9/SWMU 8, Site13C/SWMU 13, Site/SWMU 16, SWMU 27, and SWMU 35

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 November 21, 2005. Based on this review, the Department has determined that the attached comments must be adequately addressed prior to receiving a final determination.

If you have any questions or concerns, please feel free to contact me at (803) 896-4285.

Sincerely,

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

cc:

Tim Harrington, MCRD Parris Island
Don Hargrove, Hydrogeology
Priscilla Wendt, SCDNR
Amanda Flake, EQC Region 8, Beaufort

Lila Koroma-Llamas, EPA Region 4
Tom Dillon, NOAA
Mark Sladic, TtNUS

ENGINEERING COMMENTS
Prepared by Jerry Stamps
Marine Corps Recruit Depot (MCRD)
March 15, 2006

1. Response to Comment #2, Site/SWMU 4
The response to this comment does provide the rationale for not collecting samples from the Hummock area. Though the use of the visual inspections for soil staining and PID readings is beneficial in trying to identify source areas, this approach may not necessarily identify areas of contamination. The Department recommends collecting at least one or two confirmation samples from each of the suspected locations of the fire training area identified in Figure 3-1 to minimize the possibility of undetected contamination.
2. Response to Comment #2, Site/SWMU 7
It is the Department's understanding that additional work has been completed via an extended CS/SI for Site/SWMU 7. However, the results of this investigation have not been provided to the Department. The results of this investigation should be included in the revised CS/SI report. Additionally, it is unclear if this extended CS/SI addressed the piping associated with Site 7. If not, the piping must be addressed prior to making a recommendation regarding the fate of Site 7.
3. Response to Comment #2, Site 13C/SWMU 13
It is the Department's understanding that Site 13C was investigated in conjunction with Site 7. Please see Comment #2.
4. Response to Comment #2, SWMU 27
According to the Department's comments dated June 23, 2003, it does not appear as though the Department has concurred with a soil removal work plan because additional delineation of the contamination is necessary. According to the most recent response from the MCRD, it appears that a work plan was developed that included additional soil samples. However, it is unclear if this work plan included both surface and subsurface soil samples. Please clarify. Additionally, it is stated that the soil removal is targeted for areas of historical transformer storage. This approach is reasonable, however, the information used to determine these areas of historical storage must be provided.
5. Response to Comment #2, SWMU 35
The Department agrees that the investigation regarding SWMU 35 will be postponed until such time as the unit is no longer operational. The Department expects this site to remain tracked in Appendix C of the Federal Facilities Agreement (FFA). The status should be revised to be "Investigation deferred until unit is no longer operational" or similar language.
6. Response to Comment #5
As states in Comment #2 above, is the MCRD has not already done so, the Department expects that the MCRD will develop a plan to investigate the piping associated with SWMU 7. The Department will withhold any decisions regarding SWMU 7 until it is investigated in its entirety.

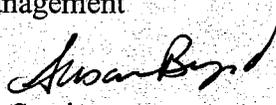


C. Earl Hunter, Commissioner

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

MEMORANDUM

TO: Jerry Stamps, Environmental Engineering Associate
Corrective Action Engineering Section
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: March 7, 2006

RE: Marine Corp Recruit Depot
Parris Island, South Carolina

Document:

Summary of SCDHEC Comments and Responses to Date for SI/CS Sites at
MCRD Parris Island

Document Dated June 3, 2005

Based on the review of the above referenced document, there seems to be an unresolved issue regarding several sites with SSL exceedances. The responses to comments regarding the elimination of compounds above SSLs state that the original work plans were targeting other compounds such as lead or PCBs. Please keep in mind that all compounds exceeding screening criteria should be retained and carried through the risk assessment process regardless if they were or were not originally identified in the sampling work plan. In all future investigations for the SI/CS sites, please be sure that all compounds exceeding risk based screening criteria are retained as COPCs. If you have any comments or need any additional information, feel free to contact me a (803) 896-4188.



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
RCRA Hydrogeology Section I
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 16 March 2006

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

Responses to Comments, DRAFT SICS Report
(June 2005)

The Division of Hydrogeology has reviewed the Document listed above. This document, dated 3 June 2005, was received electronically on 26 August 2005, and by this reviewer on 23 February 2006. It provides responses to comments generated during reviews of the DRAFT SICS Report.

This document was reviewed with respect to R.61-71 of the South Carolina Well Standards, R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents.

- 1) Based on this review, the Division of Hydrogeology has determined that MCRD has adequately addressed said comments. It is anticipated that a revised document will be submitted for further review/approval.

If you have any questions regarding this decision, please contact me at (803) 896-4033.

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