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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT REMEDIAL INVESTIGATION
ADDENDUM FOR SITE 45 MCRD PARRIS ISLAND SC
3/20/2006
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

March 20, 2006

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

RE: Draft Remedial Investigation Addendum, Site/SWMU 45
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 on November 1, 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, TiNUS

ENGINEERING COMMENTS
Prepared by Jerry Stamps
Marine Corps Recruit Depot (MCRD)
March 20, 2006

1. **General**

As stated in the comments from the EPA dated February 3, 2006 regarding this document, data gaps exist regarding the delineation of the extent of groundwater contamination. The Department supports the EPA's conclusion. The Department also supports MCRD's proposal to conduct additional investigation, as necessary, in later stages of the corrective action process.

2. **General**

The EPA provided thorough comments regarding the Vapor Intrusion analysis. The Department concurs with the EPA's concerns and will review the responses to the EPA's comments.

3. **General**

It is the Department's understanding that the MCRD will provide Pilot Study Work Plans to address the original source area as well as the area near PAI-45-MW20, which is identified as a potential secondary source of contamination. The Department does not object to the use of pilot studies to aid in evaluating effective technologies. The Department anticipates that the data collected from these pilot studies will be used in evaluating appropriate technologies during the CMS/FS phase of the corrective action process.

4. **Section 4.3, page 4-8, last paragraph**

It is stated "For the source area well (MW08SU, amount of PCE detected in 2005 was less than what it was in 1996, but greater than in 2001." This raises some concern regarding the existence of source contamination in the soil column leaching into the groundwater. MCRD must demonstrate that such contamination does not exist.



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-Hazardous Waste Section I
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 8 December 2005

RE: Parris Island Marine Corps Recruit Depot (MCRD)
Parris Island, South Carolina
Beaufort County
SC6 170 022-767

DRAFT Remedial Investigation Addendum for Site/SWMU 45 – Former MWR Dry
Cleaning Facility (October 2005)

The Division of Hydrogeology has reviewed the above referenced document. This document (dated 27 October 2005) was received by the Department on 1 November 2005, and by this reviewer on 9 November 2005. This Report describes the history of SWMU-45 the results of previous environmental investigations, and the results of the additional investigation activities performed as part of this Addendum.

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.

Based on this review, the Division of Hydrogeology has no comments concerning the investigation that was performed, or the reporting thereof.

The following comment is being generated subsequent to reviewing the information in this document:

Section 7.0, Conclusions and Recommendations: This section concludes that there is at least one

source release (near MW08 and MW24) but does not positively identify any additional source areas. Additional source area investigation is necessary before moving on to the CMS phase. A location of interest is near PAI-45-MW04SL. It is suggested that the team discuss the results presented, areas of historical activity, and review any historical site photos or additional information, at a scoping meeting, with the intent of shaping an investigative approach for source area identification.

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