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MCRD PARRIS ISLAND
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EMAIL OF TRANSMITTAL AND 20 MARCH 2006 LETTER REGARDING SOUTH CAROLINA
DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON DRAFT
REMEDIAL INVESTIGATION ADDENDUM FOR SITE 45 MCRD PARRIS ISLAND SC
3/29/2006
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

Sladic, Mark

From: Jerry Stamps [STAMPSJM@dhec.sc.gov]
Sent: Wednesday, March 29, 2006 2:43 PM
To: Don Hargrove; Koroma-Llamas.Lila@epamail.epa.gov; wendtp@mrd.dnr.state.sc.us;
art.sanford@navy.mil; Tom.Dillon@noaa.gov; SladicM@ttnus.com;
timothy.j.harrington@usmc.mil
Subject: SWMU 45 RI Addendum
Attachments: Draft RFI Addendum.doc; Draft RFI Addendum (Hydro).doc

Please disregard the letter I sent last week regarding this document. I inadvertently attached the wrong memo from Don. Here is the correct version and I am re-sending the hardcopy.

Thanks,
Jerry

4/4/2006



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, TtNUS

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: 9 February 2006

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

DRAFT Work Plan For Additional Investigation and Pilot Study /SWMU 45
(January 2006)

The Division of Hydrogeology has reviewed the above referenced document. This work plan (dated 31 January 2006) was received electronically 31 January 2006. This work plan describes the history of SWMU-45; it discusses the results of previous environmental investigations/remedial actions, and the status of the groundwater treatment system that is currently installed but not operational at SWMU-45. It also discusses the need to collect additional information at SWMU-45 to identify source areas, as well as obtain information to aid in designing a groundwater remediation plan using *in-situ* chemical oxidation.

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. It is therefore recommended that this work plan can be approved as written. Monitoring Well Approval (MWA) #HW-06-008 has been written for the installation of the wells as proposed in this work plan (see attached).

MCRD should be reminded of the requirement to obtain the necessary permits/approvals prior to implementation of the work proposed in this work plan. The Division anticipates the subsequent requests for Monitoring Well Approvals (MWAs) allowing for the installation of any additional temporary monitoring wells, MIPS points, and the permanent monitoring well described in the work plan.

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

Attachment: MWA#HW-06-008



2600 Bull Street
Columbia, SC 29201-1708

MONITORING WELL APPROVAL

Approval is hereby granted to:

Commanding Officer
Department of the Navy
SOUTHNAVFACENGCOM
ATTN: Art Sanford (Code 1862)
2155 Eagle Drive
N. Charleston, SC 29406

Date of Issue: 9 February 2006

Approval Number: HW-06-008

Facility: Marine Corps Recruit Depot
Parris Island, South Carolina
Beaufort County
SC6 170 022 767

For the installation of six (6) initial temporary monitoring wells, and up to eighteen (18) additional temporary monitoring wells at SWMU-45 as follows:

- 1) Six (6) initial shallow temporary monitoring wells to be installed at the locations specified on the attached figure.
- 2) These monitoring wells are to be installed following all of the applicable requirements of R.61-71.
- 3) Up to eighteen (18) additional temporary monitoring wells to be installed in step-out locations based on the results from the original six temporary wells, as specified above.

Conditions:

Please note that R.61-71 requires the following:

1. All wells shall be drilled, constructed, and abandoned by a South Carolina certified well driller per R.61-71.D.1.
2. A Water Well Record Form or other form provided or approved by the Department shall be completed and submitted to Donald C. Hargrove, Division of Hydrogeology, SCDHEC within 30 days after well completion or abandonment unless another schedule has been approved by the Department. The form should contain the "as-built" construction details and all other information required by R.61-71.H.1.f

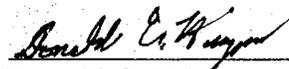
3. All analytical data and water levels obtained from each monitoring well shall be submitted to Donald C. Hargrove, Division of Hydrogeology, SCDHEC within 30 days of receipt of laboratory results unless another schedule has been approved by the Department as required by R.61-71.H.1.d.
4. All temporary monitoring wells shall be abandoned within 5 days of borehole completion using appropriate methods as required by R.61-71.H.4.c.
5. If any of the information provided to the Department changes, the Author (Donald C. Hargrove) shall be notified a minimum of twenty-four hours prior to well construction as required by R.61-71.H.1.a.

This approval is pursuant to the provisions of Section 44-55-40 of the 1976 South Carolina Code of Laws and R.61-71 of the South Carolina Well Standards and Regulations, dated April 26, 2002.

- 1) That the monitoring wells be installed by a well driller certified by the state of South Carolina. And that the certified well driller must be present during all phases of drilling, construction, and abandonment of these temporary monitoring wells.
- 2) That investigation derived waste including, but not necessarily limited to, drill cuttings, drilling fluids, development and purge water, be managed properly and in compliance with all applicable requirements. If containerized, each vessel shall be clearly labeled with regard to contents, source, and date of activity.
- 4) That the latitude, longitude and actual construction details be submitted to the Department within 30 days after installation of the last monitoring well.
- 5) A minimum of (48) hours prior to initiation of drilling activities provide notice to Amanda Flake, at Region 8 (Lowcountry)EQC Office (843) 522-9097, and Donald C. Hargrove, at the Division of Hydrogeology (803) 896-4033.
- 6) All analytical data and water levels obtained from each monitoring well shall be submitted to (Donald C. Hargrove, Division of Hydrogeology), SCDHEC within 30 days of receipt of laboratory results unless another schedule has been approved by the Department as required by R.61-71.H.1.d.

This approval is pursuant to the provisions of Section 44-55-40 of the 1976 South Carolina Code of Laws and the Department of Environmental Control's Regulation R.61-71.

Approval granted by:



Donald C. Hargrove, Hydrogeologist
Division of Hydrogeology
Bureau of Land and Waste Management
South Carolina Department of Health and
Environmental Control

Attachment: Figure

cc: Jerry Stamps, Corrective Action Engineering
Amanda Flake, Region 8 EQC, Beaufort
Lila Koroma-Llamas, Federal Facilities Section, USEPA Region IV

File #50492