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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 PROPOSED PLAN FOR A FINAL REMEDY  
AT SITE 3 MCRD PARRIS ISLAND SC

9/24/2007

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

September 24, 2007

Commanding Officer  
NAVFAC Southeast  
ATTN: Mr. Art Sanford  
2155 Eagle Drive  
North Charleston, South Carolina 29406

RE: Proposed Plan for a Final Remedy at Site/SWMU 3  
Marine Corp Recruit Depot  
Parris Island  
SC6 170 022 762

Dear Mr. Sanford:

The Corrective Action Engineering Section and Division of Hydrogeology of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document dated July 2007. Based on this review, the Department has comments. Please refer to the attached engineering and hydrogeology comments.

If you have any questions or concerns, please feel free to contact me at (803) 896-4218.

Sincerely,

Meredith Amick, Environmental Engineer Associate  
Corrective Action Engineering Section  
Division of Waste Management

cc:

Tim Harrington, MCRD Parris Island  
Joe Bowers, Hydrogeology  
Priscilla Wendt, SCDNR  
Russell Berry, EQC Region 8, Beaufort

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

ENGINEERING COMMENTS  
Prepared by Meredith Amick  
Marine Corps Recruit Depot (MCRD)  
September 24, 2007

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**General Comments**

1. It is the Department's understanding that the team has discussed the following information; however, it has not been submitted formally. Prior to further review of the Propose Plan for SWMU 3, the Department must receive and approve the information to support the following statement (Page 4 First Column Last Paragraph), "In April thru August of 2003, a supplemental investigation was performed to further investigate sediments with elevated pesticide concentrations. The supplemental investigation determined that pesticide and metal concentrations had decreased to concentrations that did not result in an unacceptable human health or ecologic risk."
2. The breach of cover that occurred during December 2006 should be discussed in the Site Background Section.

**Specific Comments**

1. Summary of Site Risks Bullet #1

Please discuss if "areas that have not been significantly affected by human activities" are located on any SWMUs/AOCs.

2. LUC Map

To clarify that the Site Boundary includes the 200 ft no access area, please define the site boundary in the document.

**Prohibition #5:**

Please clarify whether the site boundary line is located 200 ft from the toe of the landfill boundary or from the centerline. Note the Department feels that the site boundary line should be measured from the toe of the landfill as this is where the landfill debris ends.

The site boundary line should extend past Area 1 Sediment Cover.

Please clarify if prohibition #3 applies to the creeks/ponds SW of the site



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**MEMORANDUM**

**TO:** Meredith Amick, Engineering Associate  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

**FROM:** Joe B. Bowers, P.G., Manager *JB*  
Federal Facilities Groundwater Section  
Division of Hydrogeology  
Bureau of Land and Waste Management

**DATE:** September 24, 2007

**RE:** Marine Corps Recruit Depot (MCRD)  
SC6 170 022 762

Proposed Plan for Final Remedy at Site/SWMU 3 – Causeway Landfill

The above referenced document has been reviewed with respect to the requirements of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4. The Marine Corps Recruit Depot is proposing a Final Remedy for Site/Solid Waste Management Unit (SWMU) 3 – Causeway Landfill. The Division of Hydrogeology has one comment on this proposal, as outlined below.

The Marine Corps Recruit Depot (MCRD) includes in its Proposed Plan for Final Remedy at Site/SWMU 3 – Causeway Landfill a proposal to cease collection of samples from wells around this site. The Department disagrees with this proposal.

There are currently four monitoring wells around Site 3 – Causeway Landfill, including PAI-03-MW-01SR, PAI-03-MW-02DR, PAI-03-MW-03SR, and PAI-03-MW-04SR. Samples have been collected annually, except in 2005, from these wells over the last five years, per a 2001 Interim Record of Decision. The Department believes that continued monitoring of these wells is necessary. EPA Region 4 has developed a more specific comment on this subject. The Department concurs with the EPA's comment and refers the MCRD to the comment from the EPA.

cc: Bureau File 50492