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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 INTERIM MEASURES WORK PLAN FOR
SITE 3, SITE 35, SITE 53 AND SITE 54 MCRD PARRIS ISLAND SC

10/5/2007

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

October 5, 2007

Commanding Officer
NAVFAC Southeast
ATTN: Mr. Charles Cook
PO Box 30
Ajax Street North, Bldg 135
Jacksonville, Florida 32212

RE: 1. IM Work Plan for SWMUs 3, 35, 53, 54 received 11/3/2004
2. Revised IM Work Plan for SWMUs 3, 35, 53, 54 received 4/27/05
3. Draft Project Completion Report received 4/27/05
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 three documents. Based on this review, the Department has comments. Since the work outlined in the IM WP was completed in 2005, the comments were made to the report only. The Department will not ask for further revision of the IM WP. The attached comments may be addressed by revision of the Project Completion Report or in additional phases of work at the sites. 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
Heber Pittman, MCRD Parris Island

ENGINEERING COMMENTS
Prepared by Meredith Amick
Marine Corps Recruit Depot (MCRD)
October 1, 2007

General Comments

1. Please detail any cleaning procedures that occurred before the concrete vault at SWMU 54 was crushed and left in place.
2. In the IM WP Section 3.3.4, moving material from SWMU 3 to SWMU 54 for use as topsoil was discussed; however, the report never detailed this activity. Please note that in general the Department does not agree with material being moved from SWMU to SWMU, as this practice can trigger Land Disposal Restrictions, see South Carolina Hazardous Waste Management Regulation 268. The Construction Completion Report should detail if the soil was moved from SWMU 3 to SWMU 54. If so, please detail if sampling occurred to determine whether the soil was clean, the volume of soil moved, and where at SWMU 54 the soil was placed.
3. Please detail whether the decontamination water used for dust control was only generated from the site on which it was sprayed. Please also provide the data from analysis of the water used for dust control.
4. The Department understands that we are in the Proposed Plan phase at SWMU 3; however at SWMUs 35, 53, and 54 additional investigation will occur. Section 4.4 of the Construction Completion Report states, "The background data point for SWMU 54, although collected at a distance from the target sampling, shows elevated levels of some contaminants and some at similar levels to the target samples. Further comparison with the other SWMUs shows there are similar levels present throughout MCRD." The Department understands that there is no approved background data set for MCRD; therefore it is not appropriate to discuss facility wide background data in a general manner without specifically detailing how the data from each site is statistically similar. In the future, MCRD should provide more detail regarding site specific sample sets in order to justify the statement that the data is similar.
5. As stated in the objectives for both the work plan and report, the associated piping for the concrete vault at SWMU 54 was to be removed. The CCR does not specifically detail the removal of the piping. However, in the SWMU Assessment Report (SAR) for SWMU 54 it was stated that the piping was not removed and was only plugged. Please discuss fate of the piping and provide figures showing the location of all piping (influent and effluent).
6. Please note that the data collected for this report should be include/summarized in future reports.

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
Federal Facilities Groundwater Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: October 5, 2007

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

Interim Measures (IM) Work Plan for Various Sites – SWMUs 3, 35, 53 and 54, dated March 14, 2005

Interim Remedial Actions for Various Sites – SWMUs 3, 35, 53 and 54, dated March 21, 2005

The Interim Measures (IM) Work Plan for Various Sites – SWMUs 3, 35, 53 and 54, dated March 14, 2005, and the Interim Remedial Actions for Various Sites – SWMUs 3, 35, 53 and 54 report, dated March 21, 2005, have been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005.

The work proposed in the IM WP has been completed, therefore, no comments on the Workplan have been generated. However, two comments on the IM Report were generated from this review, as noted below.

It is noted in the IM Report that three temporary monitoring wells were installed adjacent to eastern wall of SWMU 54 – Waste Water Treatment Plant. Review of Figure 4 – SWMU 54 Sampling and Monitoring Well Locations reveals that these wells were installed in a straight line immediately adjacent to the former tank. Two comments have been generated as a result.

1. It is unclear in the report that the Department issued approval for the installation of these temporary wells, as required by the S.C. Well Standards, R.61-71. The MCRD should provide documentation that the Department issued approval prior to their installation.
2. The report did not include a summary table nor discuss the analytical results from the temporary wells. It is noted that report does include literally hundreds of pages of analytical data sheets, however, the report does not summarize or otherwise discuss these data. The MCRD should provide to the Department the analytical results from these wells and a discussion of the analytical results.

Should you have any questions, you may contact me at (803) 896-4024 or via email at bowersjb@dhec.sc.gov.

cc: Bureau File 50492

ENGINEERING COMMENTS
Prepared by Meredith Amick
Marine Corps Recruit Depot (MCRD)
October 2, 2007

General Comments

1. According to the IM Work Plan for SWMUs 3, 35, 53, and 54; the piping associated with the wastewater treatment tank at SWMU 54 was to be removed. However, the SAR states that the piping remains in place and is plugged. Please discuss fate of the piping and provide all influent and effluent piping on the figure in Attachment 1.
2. Please provide a construction drawing for the wastewater treatment tank.
3. Please provide summary tables for the analytical results provided in Attachment 2. Additionally page 6 of the fax (Attachment 2 is a fax copy of the analytical results) states that the Matrix was “Misc Solid.” Please detail in the summary tables if this “Misc Solid” is sludge from the wastewater treatment tank.

Specific Comments

4. Section 7.0 of the SWMU Assessment Report states that there is no “Evidence of Release/Environmental Impact Identified.” The Department does not agree with this statement, as there is not enough evidence at this point in time to make this determination.