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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON GEOTECHNICAL INVESTIGATION AT SITE
27 EQUIPMENT PARADE DECK MCRD PARRIS ISLAND SC
12/21/2007
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

December 21, 2007

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

RE: Site/SWMU 27 Equipment Parade Deck: Geotechnical Investigation
Marine Corp Recruit Depot
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Corrective Action Engineering Section and the Division of Hydrogeology of the South Carolina Department of Health and Environmental Control (Department) have completed the review of Site/SWMU 27 Equipment Parade Deck: Geotechnical Investigation received December 3, 2007. Based on this review, the Department has comments. Because this Geotechnical Investigation is occurring in an area with known contamination, all work should be performed taking proper precautions and wearing proper PPE. Please refer to the attached 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
Sommer Barker, Hydrogeology
Priscilla Wendt, SCDNR
Russell Berry, EQC Region 8, Beaufort

Lila Llamas, EPA Region 4
Tom Dillon, NOAA
Mark Sladic, TiNUS
Heber Pittman, MCRD Parris Island

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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: J. Sommer Barker, Hydrogeologist *JSB*
Federal Facilities Groundwater Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: December 21, 2007

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

Review of Site/SWMU 27 Equipment Parade Deck: Geotechnical Investigation (Henderson to Scaturro, 11/29/07)

The above referenced document has 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. This workplan proposes nine geotechnical borings in the area of Site/SWMU 27 – Equipment Parade Deck in an effort to determine whether this area is structurally adequate for location of a Motor Transportation building.

Previous investigations in this area indicate the presence of contamination in soil and groundwater. For example, the Equipment Parade Deck – Site 27 RI Work Plan, dated September 2007, summarizes soil data indicating the presence of Polycyclic Aromatic Hydrocarbons (PAHs) as well as 4,4'-DDE, 4,4'-DDD, and 4,4'-DDT. Groundwater data indicates the presence of a plume consisting predominantly of chlorobenzene, among other constituents. It should be noted that the Department recently approved (Amick to Cook, 10/24/07) the Site 27 RI Work Plan, dated September 2007, which will provide additional soil and groundwater data for this area.

The Department typically does not approve geotechnical investigations, however in this case the investigation is located in the vicinity of a known SWMU with known contamination, therefore the Department does have an obligation to review.

The Department will not prevent the installation of geotechnical borings in the area of Site/SWMU 27. However, because there is known soil and groundwater contamination in this area, the following comments have been generated. The MCRD should respond to these comments prior to implementing the geotechnical work in the vicinity of Site/SWMU 27.

1. The correspondence referenced above notes that the "material removed during the course of these borings will be containerized and disposed of in accordance with waste characterization analysis." However, the workplan is not specific with respect to how the drill cuttings will be containerized, sampling and analysis procedures, the number of samples collected, analytical parameters, and potential disposal options. The MCRD should provide this information to the Department prior to implementation of the work.
2. Given that these borings are being proposed in an area in which there is known soil and groundwater contamination, the drill stem and equipment that comes into contact with soil should be decontaminated between borings and prior to leaving the site. This will minimize the chances for cross-contamination between boring locations as well as reduce the possibility of introducing contamination into previously uncontaminated areas in the subsurface.

The MCRD should respond to these comments within 30 days of receipt of this memorandum.

Should you have any questions regarding this review, you may contact me at (803) 896-6647 or by email at barkerjs@dhec.sc.gov.