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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 GEOTECHNICAL BORINGS SAMPLING AND  
ANALYSIS/WASTE CHARACTERIZATION AND DISPOSAL PLAN AT SITE 27 MCRD  
PARRIS ISLAND SC  
2/14/2008  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

February 14, 2008

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

RE: Site 27 Geotechnical Borings: Sampling and Analysis/Waste Characterization and Disposal Plan and DoN's analysis of the proposed location of the Motor T Facility at Site 27 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 simultaneous review of the DoN's analysis of the proposed location of the Motor T Facility at Site 27 (Stewart to Llamas and Amick) and Site 27 Geotechnical Borings: Sampling and Analysis/Waste Characterization and Disposal Plan received January 24, 2008 and February 8, 2008, respectively. 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  
Sommer Barker, 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)  
February 14, 2008

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**Specific Comments**

1. Please include a map with the boring and SWMU locations.
2. Section 2.4 Field Measurements

Generally the Department recommends using both a PID and FID, which provides better detections for multiple compounds.

3. Section 3.0 IDW

In order for soil cuttings to be spread back on site, sample totals must be run in addition to TCLP. If all constituent detections are below residential PRGs, then the soil cuttings can be spread on site. The Department feels that 1 composite sample (equal amounts from each drum) per 10 drums or 3 composite samples per roll of container will provide a better representation of the IDW. If the soil cuttings are removed from the site and disposed, disposal manifests should be provided.



C. Earl Hunter, Commissioner

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

**DATE:** February 14, 2008

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

Review of Site 27 Geotechnical Borings Sampling and Analysis/Waste Characterization and Disposal Plan, dated February 8, 2008.

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 eleven (11) geotechnical borings to determine whether this area is structurally adequate for location of a Motor Transportation building.

Based on this review The Department has three comments:

1. MCRD states, "One representative sample of the liquid investigated-derived waste (IDW) from decontamination will be collected and analyzed for VOCs, SVOCs, pesticides/PCBs, and inorganics." The Department recommends that one water sample per ten drums or one sample per large holding tank is a better representation of the collected groundwater.
2. Section 3.0, third paragraph, the MCRD states "MCRD continues to investigate the source or previously observed nearby elevated groundwater pesticide contamination." The "or" should be changed to "of" so that the sentence reads, "MCRD continues to investigate the source of previously..."

3. The MCRD indicates that the IDW will be analyzed and disposed in accordance with regulations of the local, state and federal government as required dictated by the contaminant concentrations. Sampling and analysis should be performed in accordance with SW-846; Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

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](mailto:barkerjs@dhec.sc.gov).