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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON CONCEPTUAL SITE MODEL FOR SITE 27  
EQUIPMENT PARADE DECK MCRD PARRIS ISLAND SC

8/7/2009

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

August 7, 2009

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

RE: Comments to the Site 27 Conceptual Site Model  
Marine Corp Recruit Depot  
Parris Island  
SC6 170 022 762

Dear Mr. Cook:

The Corrective Action Engineering and Federal Facilities Groundwater Section of the South Carolina Department of Health and Environmental Control (Department) completed the review of the Site 27 Conceptual Site Model received July 3, 2009. This document was reviewed with respect to outstanding comments on the Site 27 RI WP issued by the Department September 4, 2008. See the following attached engineering and hydrogeology comments. Please note the Department does not expect to receive a revised version of the Conceptual Site Model; however, these comments should be addressed in the subsequent phases of the investigation of Site 27 and should be captured and summarized in the RI for Site 27.

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  
Annie Gerry, Hydrogeology  
Priscilla Wendt, SCDNR  
Russell Berry, EQC Region 8, Beaufort

Lila Llamas, EPA Region 4  
Tom Dillon, NOAA (via email)  
Mark Sladic, TtNUS  
Heber Pittman, MCRD Parris Island

ENGINEERING COMMENTS  
Prepared by Meredith Amick  
Marine Corps Recruit Depot (MCRD)  
August 7, 2009

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**General Comments**

1. If recommendations for any of the Sites discussed in this document continue to be “if the industrial setting at Site X were to change in the future, a reevaluation of the no action/no further action decision should be reconsidered”, the Land Use Controls at a minimum on this property would include a restriction of no residential reuse.
2. In the work plan for removal of soil, an explanation should be given as to why removal is the best alternative for remediation of soil at this site.

**Specific Comments**

1. Section 1.4.3.4

The maintenance of the concrete pad discussed under Site 9 may need to be a LUC in the future. The soil data taken underneath the pad and any recommendations that the Navy has should be presented in the RI Report for Site 27.

2. Section 3.2

The Department reiterates the following comment (Amick to Cook, September 4, 2008), “[T]he rationale for limiting the analyte list should be included. This should include the rationale for eliminating SVOCs, PCBs, Inorganics, PAHs, non-chlorinated pesticides, herbicides, etc.”

3. Section 3.2.10

The Department reiterates the following comment (Amick to Cook, September 4, 2008), “Please discuss the number of samples taken from the drums containing soil cuttings and the fate of the drums. Additionally provide the data from the sampling and disposal manifests.”

4. Section 4.0

Soil data should also be compared with the newly established Regional Screening Levels

with respect to migration to groundwater.

5. Section 4.0 page 4-3

The Department reiterates the following comment (Amick to Cook, September 4, 2008), “The background data set referenced in this document is not approved for Site 27, 9,16 and 55. Therefore, data should be provided to prove background metal contamination and anthropogenic background (pesticide application documentation and park lot run off sampling).”

6. Section 6.1 First paragraph Last Sentence

The sentence reads, “The proposed IRA includes excavation of contaminated soil, removal of LNAPL and a limited amount of contaminated groundwater and off-site transportation and disposal of contaminated material as non-hazardous wastes.” The disposal of these wastes should be based on analytical results from samples taken of the respective drummed material.

7. Amick to Cook, September 4, 2008 Specific Comment #2

Although the CSM that was presented in the Site 27 RI WP is not presented in this document, it will need to be presented in the Site 27 RI Report. Therefore, the Department reiterates the following comment, “The Department disagrees with the Response to Comment. Until the site is completely delineated all exposure routes should be evaluated on the CSM (including the pathways discussed in the previous Amick’s April 2008 Comment and groundwater to surface water discharge). An updated CSM should be included in the RI Report. “

8. Amick to Cook, September 4, 2008 Specific Comment #6

The Department reiterates the following comment, “Please note, the toxicity data used to calculate the Regional Screening Levels will be periodically updated, thus changing the screening values. The Navy should ensure the use of the most recent version of the Regional Screening Levels when writing the RI Report.”

## **MEMORANDUM**

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

**FROM:** Annie Gerry, Hydrogeologist  
Federal Facilities Groundwater Section  
Division of Waste Management  
Bureau of Land and Waste Management

**DATE:** August 4, 2009

**RE:** Marine Corps Recruit Depot  
SC6 170 022 762

Review of Conceptual Site Model (CSM) for Site 27-Equipment Parade Deck, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated June 2009

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. Site 27 was formerly used as a parade ground and a storage area for out-of-service storage tanks, concrete cylinders, boilers, scrap metal and piping. Transformers containing polychlorinated biphenyls (PCBs) were reportedly stored in the northern portion of the Equipment Parade Deck. Site 9 (Former Paint Waste Storage Area), Site 16 (Pesticide Rinsate Disposal Area), and Site 55 (Fiber Optic Vault) are also included in this area for investigation. This CSM will serve as a basis for recommending additional sampling at Site 27 to further delineate the extent of the Light Non-Aqueous Phase Liquid (LNAPL) and contaminated soil detected in the vicinity of the Fiber Optic Vault which may be acting as an ongoing source of contamination in the Site 27 area.

Based on review of this document, the following comment has been generated.

### Comment

1. Comments made from the Remedial Investigation (RI) Work Plan Addendum for Equipment Parade Deck – Site 27 by J. Sommer Street on September 4, 2008 have not been responded to. Please respond to these comments and finalize in the final RI report.

Should you have any questions regarding this memo, please contact me via email at [GerryAM@dhec.sc.gov](mailto:GerryAM@dhec.sc.gov) or by phone at (803) 896-4018.