

M00263.AR.000781
MCRD PARRIS ISLAND
5090.3a

LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON SAMPLING AND ANALYSIS PLAN FOR SITE
INVESTIGATION AT SITE 5 MCRD PARRIS ISLAND SC

12/4/2009

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

December 4, 2009

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

RE: Comments to the UFP SAP for RI of Site 5
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the UFP SAP for RI of Site 5 received September 30, 2009. Based on this review the Department provides the following engineering and hydrogeology comments.

The Department's comments are based on the information presented by MCRD to date; any information found to be contradictory may result in additional comments or require further action. The response to the review should consist of response to comments and revision pages. If you have any questions regarding this issue, please 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 *MA*
Marine Corps Recruit Depot (MCRD)
December 2, 2009

General Comments

1. The Final SI/CS Report with RTCs must be received before the Department can further review the RI SAP at Site 5.
2. The Department understands that MCRD has learned a significant amount of fill was placed on Site 5 after 1972. Please provide information on this activity including: how much and where fill was placed in the area, where the fill originated, water table depth in relation to fill, where the construction debris was placed within the fill (i.e. how deep and is any still exposed). Additionally current day operations in the area should be discussed in order to distinguish any detected contamination. Using this information, the Conceptual Site Model should be refined, at which time the Department will be able to conduct a complete review of the document and determine the applicability of the sampling plan.
3. Because of the significant change in information associated with this site, once the requested information is received the Department believes that a discussion (either in a conference call or meeting) should occur to determine the best path forward.
4. The Department believes that the sampling plan should include sample analysis for SVOCs and pesticides. The July 2002 CS/SI report (Section 4.2.3) states that SVOCs and pesticides were detected in soil samples (now assumed to be taken in the fill) above background. Additionally, because the CS/SI report is now being finalized, the data should be rescreened using the most recent screening values. When the SI/CS Report samples are discussed in the RI SAP, please discuss the location of the samples (i.e. within fill, show locations on a map, etc.).
5. The RI SAP states that construction debris was used to fill area around Site 5. See comment #2. Based on the information provided in response to comment #2, the Department may determine this area to be a landfill. If the area is determined to be a landfill, NFA will not be an appropriate remedy.
6. The Department is unclear why the site is divided into two areas and believes that human health and ecological risk should be evaluated for both areas. The division of the site may lead to an extremely complicated CSM by separating potential source areas from their intended receptors. If the site remains separated into two areas and human health and ecological risk are not evaluated for both areas, then LUCs and/or further discussion will be warranted.

7. Please indicate paved areas on the maps provided.
8. An unacceptable human health risk should be defined as an ICLR greater than 1×10^{-6} . ICLRs between 1×10^{-4} and 1×10^{-6} require using risk management to make remedial decisions.
9. In order for Site 3 background data to be used for screening at Site 5, please prove that they are comparable data sets.
10. In the RI Report for Site 5, please provide all screening criteria on the data tables.
11. Please ensure that at the time of publication of the report from this field work the most recent screening values for each media are used.
12. Disposal manifests for all IDW generated should be provided in the RI Report.
13. Please update Worksheet #16.

Specific Comments

14. Section 10.2.3

Area 3 is mentioned in the CSM for Area 1. The Department believes this reference should be Area 2. Please clarify.

15. Page 48/119 "Utility Clearance/digging permit acquisition"

Please discuss the dig permit process.



C. Earl Hunter, Commissioner

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

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: December 4, 2009

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) for Remedial Investigation of Site 5, Former Paint Shop Disposal Area, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina, dated September 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 5 is a disposal area where dried paint wastes from Structure 177 and nearby structures were deposited at the edge of the Beaufort River from the 1930s to 1960s. During previous investigations, the area was found to be impacted by volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals. Further sampling of these constituents is proposed in this Quality Assurance Project Plan and will be conducted by sampling surface soil, subsurface soil, sediment, and groundwater.

Based on review of this document, the following comments have been generated.

Comments

1. On Page 26, *Section 10.2.2-Hydrogeology*, the text reads, "There is no hydrogeologic information at Site 5. However, hydrogeology studies performed at Site 27 are applicable to Site 5." Please be advised that once site-specific data for groundwater is

DD090652.AMG



C. Earl Hunter, Commissioner

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

acquired for Site 5, the Hydrogeology Section will need to be revised since that statement is not known to be entirely accurate.

2. On Page 48, *SAP Worksheet #14- Summary of Project Tasks*, please revise the document to state that drilling and installation of monitoring wells will be in accordance with the S.C. Well Standards R.61-71. In addition, since groundwater monitoring wells are proposed for installation, please submit a well request form to the Department.
3. On Figure 17-1, three groundwater monitoring wells are proposed for installation. The Department requests that a fourth well be installed in the northwest quadrant of Area 1 in the grassy area near soil boring A1SB01. This would improve the ability of the well network to detect contamination since the nearest monitoring well (A1GW01) is approximately 75 feet away.

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

DD090652.AMG