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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 U S NAVY RESPONSE TO COMMENTS ON
MUNITIONS RESPONSE PROGRAM SAMPLING AND ANALYSIS PLAN MCRD PARRIS
ISLAND SC
1/5/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

January 5, 2010

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

RE: Comments to the RTCs for MRP SAP SI WP
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 RTCs for MRP SAP SI WP received December 18, 2009. Based on this review the Department provides the following engineering comments. Additionally the electronic comments, which were expedited because of the potential to affect fieldwork, sent on December 18, 2009 to the electronic version of the RTCs (received December 4, 2009) are attached and reiterated.

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)
January 5, 2010

General Comments

1. There are several responses to comments that indicate that the wording in question was removed. Please note, the Department has concerns about removing the wording rather than answering the comment. The comments remain unanswered and still require a response.

Specific Comments

1. Response to General Comment #3

Please explain why UXO 1 was included in the SI SAP as it was listed in the Preliminary Assessment as "of questionable existence". Please explain why the Fuse Range at Elliot's Beach and the Hand Grenade Range near Elliot's Beach were left out of the SI SAP and were listed in the Preliminary Assessment as "of questionable existence". To clarify the administrative record, a table of all sites from the Preliminary Assessment should be provided along with an explanation of why they are or they are not being investigated as part of the MRP SI SAP. For this reason it is important for the Department to be involved with each site beginning at the Preliminary Assessment stage.

2. Response to General Comment #6

The borrow material removed from UXO 4 is a RCRA site. It should be located and investigated as either part of the MRP UXO 4 RI or as a new site.

3. Response to General Comment #7

The borrow material removed from UXO 2 is a RCRA site. It should be located and investigated as either part of the MRP UXO 2 RI or as a new site.

4. Response to General Comment #9

General Comment #1 (see above) is reiterated. The dry dock should be further discussed to determine if it should be identified as a new site. This can be done in future team meeting and conference calls.

From: Meredith Amick
To: (email)(timothy.j.harrington@usmc.mil), tim harrington; (E-mail), Prisc...
CC: Basinski, Ralph; Blanken, Michelle
Date: 12/18/2009 11:39 AM
Subject: Re: MCRD Parris Island MRP SI SAP RTC and path forward

Hi team,

These are the Department concerns on the responses that will affect the field work. Additional concerns will be addressed when the revised SAP is officially reviewed.

Response to General Comment #2

Please explain for all sites how the areas on which MEC investigation will be done were chosen. Additionally please explain why the areas not undergoing MEC investigation were not chosen. The Department needs this information in order to concur with the investigation strategy.

Response to General Comment #8

Based on the table provided, it still appears that at some UXO sites (possibly UXO 4, 6, and 8), the detection depth of the instrument may not be great enough to detect potential MEC. At these sites, Land Use Controls will be required, and the site may need to be closed as a landfill.

Response to General Comment #14

Soil and Sediment sampling depth should be reconsidered and explained for each individual site. This explanation should be based on both risk (i.e. deep burrowing species in Beaufort known to burrow to a depth of at least 3ft) and delineation (i.e. at least 6 inches below where anomalies are detected).

Response to Specific Comment #2

pH data should be obtained as it can effect leachability of metals. This may help in a weight of evidence argument, since background data will not be used in the SI.

Region 4 policy is to use the screening values from the RSL Summary Table for comparison. Therefore, to remain consistent, these values should be used instead of the Region 5 Soil Screening Levels.

Annie's review is as follows:

The Department wants to make it clear that groundwater samples will be required for the sites before consideration will be given for no further monitoring.

Let us know if you have questions.
Meredith

>>> "Sladic, Mark" <Mark.Sladic@tetrattech.com> 12/4/2009 2:18 PM >>>
Good afternoon everyone:

Please see attached RTC for EPA and SCDHEC review comments on the MC and MEC SAPs. The most significant item that might require some additional discussion is the resolution of the geophysics study. We intend to use modern, up to date equipment for the geophysics surveys. However, the maximum effective depth that this equipment can register does have limitations, that unfortunately do not always match up optimally with potential munitions penetration depths. This is not an issue exclusive to MCRD, the equipment specified, or the application. We may need to be careful about how we interpret a geophysics study that provides less information than we hope for, but there are not a lot of viable options (either technical or cost) to improve the performance. We believe that any other remaining issues will be relatively minor.

Based on our experience at other sites, we believe the information collected will support an appropriately complete SI analysis and documentation.

In order to support the mandatory 30 September 2010 submittal date for the final SI Report, it is necessary to expedite

field mobilization. We propose to field mobilize in January. A specific date will be determined after Team concurrence, based on staff schedules.

Please review the attached RTC and let us know if you identify any obstacles to a January mobilization, cognizant that data collection issues are critical, but that data interpretation issues can still be resolved (if any) during or after field mobilization. The two attached spreadsheets support responses to DHEC comments. Thanks.

Mark Sladic, P.E. | Project Manager
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