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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL CONDITIONAL APPROVAL OF SAMPLING AND ANALYSIS
PLAN FOR MUNITIONS RESPONSE PROGRAM SITE INVESTIGATIONS MCRD PARRIS
ISLAND SC
3/9/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

March 9, 2010

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

RE: Conditional Approval of the Sampling and Analysis Plan for MRP SIs at 8 MRP Sites
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 Sampling and Analysis Plan for MRP SIs at 8 MRP Sites received February 1, 2010. Based on this review the Department conditionally approves the document and provides the following conditions.

The Department's approval is based on the information presented by MCRD to date; any information found to be contradictory may result in additional comments or require further action. If you have any questions regarding this issue, please contact me at (803) 896-4218.

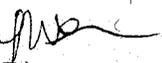
Sincerely,

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 
Marine Corps Recruit Depot (MCRD)
March 9, 2010

General Comments

1. The Navy chose to perform the work associated with the SI work plan at risk, as the SI work plan was incomplete at the time the work was performed. Based on the schedule in the document it appears that the report on this work should arrive this month. Therefore, the Department is conditionally approving this document to keep the process moving. In order for the Department to concur with the path forward at these sites, we expect that the comments sent previously to this document (both November 6, 2009 and January 5, 2010) will be addressed in the upcoming SI Report. Also these additional comments should be addressed in the SI Report.

Specific Comments

2. Response to Amick Comment #5

This response states that background data will not be used in the SI and will be removed from the SAP. However, Section 10.3.1.2 discusses background ranges. Please note that if background is discussed in the SI Report, the background data must be proven to be applicable to each of the individual sites.

3. Response to Amick Comment #8 and #18

Please include the tables discussed in these comments in the SI Report.

4. Response to Amick Comment #14

This response is not consistent with the Response to EPA Comment #21. The response to EPA's comment is more what the Department was looking for; however, the rationale for the sampling interval (2-3 feet) and which sites it applies to should be discussed in the report.

5. Response to EPA Comment #10

Although the areas around firing points D and F are developed, they must still be investigated.