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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 DATA QUALITY OBJECTIVES FOR SITE 14
STORM SEWER OUTFALLS MCRD PARRIS ISLAND SC

3/25/2010

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

March 25, 2010

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

RE: Comments to the Site 14 DQOs
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 Site 14 DQOs received February 16, 2010. Based on this review the Department provides the following general 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. 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 Arnick
Marine Corps Recruit Depot (MCRD)
March 25, 2010

General Comments

1. These comments capture those discussed during the March 23, 2010 conference call. Please understand that once the Site 14 SI SAP is received the Department may have more comments, as it is very difficult to review just 2 of 37 worksheets:

- The Department has concerns about the definition of process area and what all it includes. The Department feels that it should include USTs, OWSs, Petroleum sites, SWMUs, AOCs, MRP Sites, etc.
- The Department has concerns about the definition of non process area, as an email received 3/22/10 indicates that the outfall discharging the Site 45 area with known contamination is listed as a non process area. This is especially of concern as the non process areas are to be used as "background" concentrations.
- Additionally please understand if a true non process area yields data that is "very hot" for unexpected contaminants, it should no longer be considered a non process area to be used as "background" and should be further investigated.
- Storm water samples should be taken at outgoing low tide during a rain event. Sediment samples should be taken only in places where an eco receptor is present (i.e. not around paved areas); also only in areas with low incoming flux to the pipe and low water body flux at the outlet of the pipe.
- The Department does not agree that if either a surface water or sediment sample is "hot" and its corresponding media sample is not "hot," no further action is warranted. This will need to be an outfall by outfall decision.
- Both flowing and non-flowing process area outfalls should be sampled. The storm water from non-flowing outfalls should be captured as described in bullet #4.
- All process area outfalls should be sampled for storm water regardless of whether the outfall is inundated with water. If the outfall is inundated with water, a sample should be taken at the inlet of the pipe where surface water no longer influences the flow.
- In the SI SAP, please provide schematics of the storm water sewer system at MCRD PI, as well as a listing, description, and photo of each of the outfalls and the area that it drains. The Department will use this information to determine which non process area outfalls should be sampled.