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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 SINKHOLE AT SITE 3 CAUSEWAY
LANDFILL MCRD PARRIS ISLAND SC
11/4/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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November 4, 2010

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

RE: Review of the Sinkhole on 3rd Battalion Causeway
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 *Sinkhole on 3rd Battalion Causeway* received November 1, 2010. The Department reviewed the document with respect to applicable sections of the South Carolina Hazardous Waste Management Regulations (SCHWMR). Based on this review the Department provides the following comments.

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

Sincerely,

Meredith Amick, P.E., Environmental Engineer
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, P.E., TtNUS
Heber Pittman, MCRD Parris Island

Engineering Comments
Prepared by Meredith Amick
Marine Corp Recruit Depot (MCRD)
November 2, 2010

General Comments

1. The Department reiterates the following comments made to the August 16, 2010 Site 3 Sinkholes letter:
 - a. Per the Department's August 3, 2007 letter (Amick to Sanford), methods ensuring that Land Use Controls were implemented and followed properly were to be carried out at Site 3. It is apparent from this letter that both the lack of the stability of the landfill as well as the lack of communication of Land Use Controls at Site 3 are still an issue. The implementation of Land Use Controls (LUCs) as described in the upcoming LUC RD for Site 3, should clearly state how the Depot has corrected these problems and anticipates compliance with the LUCs in the future (i.e. the leaking culvert must be corrected, proof of communication of LUCs must be provided, etc.).
 - b. As stated in the five year review quarterly LUC inspections are occurring at Site 3. The Department should be receiving reports from these inspections on a quarterly basis. [While the Department understands that quarterly submission was not originally requested for Site 3, the Department feels it is necessary due to many breaches of Land Use Controls at Site 3. The Department will require this as part of the Site 3 LUC RD.]
2. Based on the Department's interpretation of the LUCIP for Site 3 and the LUCAP for the base, the formation of sinkholes at Site 3 does "trigger notification." Based on interpretation from Section VI.C.3 from the LUCAP, the formation of a sinkhole is a "site activity that may disrupt the effectiveness of the implemented LUC," as the LUCs for Site 3 are intended to maintain the cover. The Department should be immediately notified in the event that such occurrences happen in the future. Sinkholes and other repeated intrusive activities have been documented at Site 3 and should be discussed and a plan proposed for correction in the LUC RD for Site 3.
3. Stability of the landfill and maintenance of the cover are portions of the remedy in the Proposed Plan that will be carried through to the ROD. Because the formation of sinkholes is a continuing problem, the Department needs documentation that a permanent solution is being designed before we concur with the ROD.