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MCRD PARRIS ISLAND
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LETTER AND COMMENTS FROM SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL REGARDING DRAFT WORK PLAN FOR MUNITIONS
RESPONSE PROGRAM (MRP) EXPANDED SITE INVESTIGATION AT UNEXPLODED
ORDNANCE SITES 1, 2 AND 4 SUBAREA MCRD PARRIS ISLAND SC

3/16/2012

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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March 16, 2012

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

and

Commanding General
NREAO
ATTN: Ms. Lisa Donohoe
PO Box 5028
Parris Island, SC 29905

RE: Comments to Draft WP for MRP Expanded SI at UXO 1, UXO 2, and UXO 4 Subarea
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Cook and Ms. Donohoe:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the above referenced document received February 21, 2012. 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 has comments. Please see attached engineering and hydrogeology comments.

The Department's review is 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,

A handwritten signature in black ink, appearing to read "Meredith Amick", with a long horizontal flourish extending to the right.

Meredith Amick, P.E., Environmental Engineer
Corrective Action Engineering Section
Division of Waste Management

cc:

Lila Llamas, EPA Region 4
Annie Gerry, Hydrogeology
Priscilla Wendt, SCDNR

Russell Berry, EQC Region 8, Beaufort
Peggy Churchill, TtNUS

Engineering Memo
Prepared by Meredith Amick 
Marine Corp Recruit Depot (MCRD)
March 16, 2012

1. Please note the Watershed Contaminated Source Document in Appendix B can be used on a site by site basis as a weight of evidence as to why background should be utilized. However, prior to background being utilized it must be approved by the Partnering Team
2. On Page 32 the following statement is made, "All concentrations less than DLs will be considered non-detects and will be reported as DL values with a U qualifier. This reporting convention is preferred by SCDHEC." This statement does not agree with the reporting convention recommended in RAGS Section 5.3.3, pg. 5-10, "The non-detected results usually are reported as SQLs."
3. Detection Limits should be below Project Action Limits for all analytes in all media. If low enough detection limits cannot be achieved an explanation should be provided in the report.
4. Please respond to Amick Condition #2 and #3 from the March 16, 2012 Conditional Approval of the RI SAP D2 for UXO Sites.

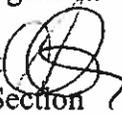


Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

MEMORANDUM

TO: Meredith Amick, P.E., Engineering Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Annie M. Gerry, Hydrogeologist 
Federal Facilities Groundwater Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: March 15, 2012

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft-Work Plan for Expanded Site Inspection at UXO 1, UXO2, and Rocket Range UXO 4 Subarea Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated February 2012

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. Unexploded Ordnance (UXO) 1 is a former grenade range near old swimming pool at Weapons and Field Training Battalion Area, UXO 2 is a former rifle range at Ballast Creek, and UXO 4 is a former Rocket Range. The Navy has conducted various testing, training, and disposal activities related to military munitions at MCRD. The Department of Defense (DoD) is following the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process for the investigation and remediation of these sites. This work plan documents the objectives and field investigations planned for UXOs 1, 2 and 4 to aid in establishing the nature and extent of contamination. Investigations of other UXO sites at MCRD are being conducted under a separate document (Remedial Investigation [RI], 2012).

Currently the work plan does not propose groundwater or surface water sampling at this stage of the investigation. However, if the results of the proposed investigations indicate a potential for migration of constituents, groundwater and surface water sampling may be necessary before the Department can concur that no further investigation is required for these sites.

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.