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U S NAVY RESPONSE TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS TO CONDITIONAL CONCURRENCE TO WORK
PLAN FOR EXPANDED SITE INSPECTION UXO 2 AND 4 SUBAREA MCRD PARRIS ISLAND
SC
5/1/2012
U S NAVY

**RESPONSE TO SCDHEC COMMENTS DATED AUGUST 8, 2012
CONDITIONAL CONCURRENCE TO WORK PLAN FOR MUNITIONS RESPONSE
PROGRAM EXPANDED SITE INSPECTION AT UXO 2 AND ROCKET RANGE UXO 4
SUBAREA, DATED MAY 2012
MARINE CORPS RECRUIT DEPOT PARRIS ISLAND
PARRIS ISLAND, SOUTH CAROLINA**

Meredith Amick, P.E., Environmental Engineer

1. **Comment:** Please address SCDNR concerns (as provided in the June 22, 2012 letter) through the RI process.

Response: The comment is noted; please refer to the Responses to South Carolina Department of Natural Resources (SCDNR) comments.

2. **Comment:** Although UXO 1 is mentioned in this document, the Department understands that the administrative process for UXO 1 will be handled under separate documentation. Any necessary comments for UXO 1 will be made to the UXO 1 documentation.

Response: Correct, the administrative process for UXO 1 is being handled under a separate document, an Explosives Safety Submission (ESS) for No Further Action (NFA) is being prepared for UXO 1. The Partnering Team reviewed the presentation on UXO 1 at the April 2012 meeting and agreed that comments would be provided following the Navy QA Panel's decision to approve the NFA request. The panel did approve the request and an NFA ESS was prepared and submitted to MARCORSSCOM.

3. **Comment:** Based on discussions during the team meeting July 25, 2012, the Department understands that investigation at the Rocket Range UXO 4 Subarea will also occur from the waterside (north side) of the range. This will ensure that any MEC or MD accessible by property adjacent to the creek is investigated.

Response: The areas of the Rocket Range accessible by foot were investigated during the ESI fieldwork. The areal extent of MEC/MPPEH still visible on the surface following the investigation was logged by GPS during a walking survey and presented to the Team in the February 7, 2013 conference call. This boundary will be adjusted to include a consideration of potential subsurface items and to account for a suitable margin of error on the northern side to delineate the area to be addressed in the FS. Although discussed at the July 2012 Team meeting, a boat-based investigation from the waterside of the range will not be conducted based on site conditions because a boat would not be able to get close enough to the rocket debris area to provide information that would result in a substantial change to the delineated area.

4. **Comment:** **Response to Amick Comment #1.** The response is satisfactory; however, the statement, "This reporting convention is preferred by SCDHEC." remains in the document. This statement is incorrect, please ensure that this statement is not included in further documentation.

Response: Agree. This statement will not be included in future documentation.

5. **Comment:** **Response to Gerry Comment #1.** To be consistent with soil and sediment analysis at the Rocket Range UXO 4 Subarea, the groundwater sample should also be analyzed for metals.

Response: Agreed. Groundwater from the temporary well was analyzed for explosives, perchlorate, and metals.