

M00263.AR.001416
MCRD PARRIS ISLAND
5090.3a

LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT 1 SITE INSPECTION WORK PLAN
FOR SITE 8 MCRD PARRIS ISLAND SC
8/6/2012
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

August 6, 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 D1 Site 8 SI Work Plan
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 *D1 FY Site 8 SI Work Plan* received May 29, 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 the following comments. Please see the attached 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,

Meredith A Amick

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

cc:

Lila Llamas, EPA Region 4
Peggy Churchill, TtNUS
Russell Berry, EQC Region 8, Beaufort

Annie Gerry, Hydrogeology
Priscilla Wendt, SCDNR

Engineering Memo
Prepared by Meredith Amick
Marine Corp Recruit Depot (MCRD)
July 24, 2012

1. Section 11.4

- Please discuss how a “PCB congener is likely present in a sample that is reported as not detected.”
- Please discuss if hold times will allow for a quantitative analysis for PCB congeners, as discussed in paragraph 2 of #1.
- Please clarify the decision rule if WHO list PCB congeners are present and if Aroclors are detectable but less than PALs.

2. Work Sheet # 17

- Please clarify at both areas of investigation, 8A and 8B, if the amount of dirt removed is known. If this is not the case, please clarify how it will be known whether the soil sampling is not in fill material.
 - Site 8A: For example it appears that the samples will be taken within the fill area. The Department believes that a better use of the samples would be to take 4 borings (surface [0-1 ft] and subsurface samples [3-5 ft]) immediately outside of the fill area and one boring (subsurface sample) directly below the fill/original soil interface.
 - Site 8B: It is unclear whether the soil samples will be collected within the fill, because it is unclear how much soil was removed at the time of the spill. The Department believes that both surface and subsurface samples should be taken below the asphalt pad. Surface samples should be taken below the asphalt pad at the fill/original soil interface. Subsurface samples can be taken at the 3-5 ft interval, assuming removal did not occur at this depth.
- Please clarify why the assumption was made at Site 8B that the source area is “approximately 30 feet wide by 30 feet long by 5 feet deep.”

3. Figures 17-1 and 17-2

A better scaled map showing more detail for each site and soil sampling locations in relation to the spill and removal areas should be provided.

BOARD:
Allen Amsler
Chairman
Mark S. Lutz
Vice Chairman



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

BOARD:
R. Kenyon Wells
L. Clarence Batts, Jr.
Ann B. Kirol, DDS
John O. Hutto, Sr., MD

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: August 6, 2012

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft- Sampling and Analysis Plan (Field Sampling Plan and Quality Assurance Project Plan) Site Inspection Sites 8A and 8B, Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina, dated May 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. Site 8 is composed of two distinct polychlorinated biphenyl (PCB) spill areas designated as Sites 8A and 8B. Site 8A is the location of a 1984 spill of PCB oil of unknown quantities near Building 111 where a soil excavation of contaminated soil was implemented. Site 8B is the location of a 1983 spill of PCB of unknown quantities near Building 450 on an asphalt-covered equipment pad where it was noted that the transformers were also leaking. Initial analyses indicated the presence of PCBs so the asphalt and sand which were transported off-site for disposal.

Based on review of this document, the following comments have been generated.

COMMENTS

1. It was noted that groundwater samples are not proposed at this stage of the investigation based on discussions with team members. However the Department is requesting that groundwater samples be collected and analyzed for PCBs. All associated worksheets and figures should be updated to reflect this change.
2. Please add another figure that depicts the sampling locations in better detail. Figures 17-1 and 17-2 do not show the sampling locations clearly enough.

File # 50492

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.

