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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT 1 SITE INSPECTION REPORT FOR
SITE 8A AND SITE 8B MCRD PARRIS ISLAND SC

7/9/2013

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

July 9, 2013

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

and

Commanding General
NREAO
ATTN: Mr. Tim Harrington
PO Box 5028
Parris Island, SC 29905

RE: Comments to D1 PA/SI Report for Sites 8A and 8B
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Owens and Mr. Harrington:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the above report received April 1, 2013, 2013. 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.

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) 898-0368.

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
DOD Corrective Action 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, TiNUS

Engineering Memo
Prepared by Meredith Amick
Marine Corp Recruit Depot (MCRD)
July 2, 2013

1. In Table 6-1 please explain the difference (sometimes significant) in Aroclor concentrations and Total PCB concentrations. For example PAI8A-SS05-0001 has an Aroclor-1260 concentration of 1,000 ppb and a Total PCB concentration of 3,470,000 ppb.
2. Please explain Table 6-5 and the calculations performed for this table. Additionally please explain the significance of the Ratio of actual to theoretical Aroclor-1260 as 24.78 for a Site 8B sample and approximately 1 for both Site 8A samples.
3. The Department believes it may be necessary to take some step out confirmation samples in the northern portion of Site 8A due to the increasing nature of the Aroclor detections in this area.
4. As stated in the DHEC letter on May 14, 2013 to the March 2013 accidental intrusion at Site 8A, please provide soil and concrete data from this intrusion as well as the disposal manifest generated from this action.



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

MEMORANDUM

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

FROM: Annie M. Gerry, Hydrogeologist 
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: July 9, 2013

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft- Preliminary Assessment/Site Inspection Report for Sites 8A and 8B, Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina, dated March 2013

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. **Page 6-2, Section 6.1.1 PCBs and PCB Congeners-** A more in-depth discussion and explanation of the PCB weathering process must be included in this report. A detailed discussion/explanation of the weathering process would be beneficial to the public.
2. **Page 7-2, Section 7.2 Recommendations-** This section recommends no further action/investigation at Site 8A even though PCB Aroclor-1260 is present above risk-based screening criteria at several locations. The Department does not agree with a no further action/investigation at Site 8A.

Based on the step out confirmation samples that the Department is requesting for further investigation in the northern portion of the site (See Amick Comment # 3), the Department may require additional groundwater samples/installation of more monitoring wells pending the data from the step out confirmation samples to determine the extent of contamination.

If you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 898-0359.

