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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON THE DRAFT 1 SITE MANAGEMENT PLAN
FOR FISCAL YEAR 2013 MCRD PARRIS ISLAND SC
7/16/2012
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

July 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 D1 FY 2013 Site Management 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 2013 Site Management Plan* received June 15, 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,

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

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 10, 2012

1. Please note the Department's review of this document focused on the current year milestones rather than out-year milestones.
2. None of the 3 tables listing documents submittals contain dates that match. These tables include dates provided in: the text of the SMP, Table 1 of the SMP, and Table 1-B sent by Charles Cook in email June 12, 2012. Once it is determined which table is correct, it appears that there are too many documents for review for FY 2013. Please prioritize and change the text and tables to reflect the Navy's priority for documents needed to be completed in FY 2013.
3. Every site except for Site 14 and UXO 2 and 4 are missing a document step. For example, the Site 35 RI WP D2 is scheduled to be received on Oct 3, 2012; however, there is no scheduled date for submittal of the Site 35 RI WP D1. There are 5 D2s in this category in October and November 2012. The sites that fall into this category are Site 4/13C, 5, 7, 8, 9, 16, 27, 35, 45, and 55.
4. Several time frames between D1 and D2s are very tight (Site 14 RI WP, etc) and at least one (UXO 2 and 4 RI Report) doesn't even meet the regulator review time frames for review (i.e. 45 day review time frame plus a possible 20 day extension). This doesn't account for timeframes between document steps (i.e. RI to FS, etc). Please review timeframes along with work load and set a more realistic review schedule, so as not to set the team up for continuous submittal of extension letters throughout FY 2013.
5. At this point based on the issues listed in Comments 2-4, the Department cannot agree to the 30 day review of D2s. Additionally, please explain why the Navy retains a 75 day revision time frame between D1 and D2 with a possible 20 day extension; however, the regulators are being asked to across the board cut their review time frames for D2s to 30 days as shown on page 10.
6. The text in the SMP should be updated for several sites.
 - a. Site 12/SWMU 10 discussion should be revised and updated per the information and recommendations presented in the latest LTM Report received December 28, 2011.
 - b. Site 13C should be revised and updated to agree with the path forward discussed under the text in the section for Site 4.
 - c. Site/SWMU 14 states that "sampling to support the Site 14 SI will include a former OWS location near a Storm Sewer Outfall on Elliot's Beach." The Department is unsure if the sampling at the Elliot's Beach OWS has occurred. Please clarify.
 - d. Site/SWMU 21 discussion states that "removal of the oil water separator is planned for FY 2011..." Please clarify if the removal was completed.
 - e. Site/SWMU 45: Please update the status section.

- f. Site 27: Please update the status section and clarify if a floating layer of fuel is still present at the site.
 - g. Site/SWMU 46 should be revised to reflect as stated in Table 3 that the investigation is continuing as part of a follow up to Site 14.
 - h. UXO 1: Please note that the document recommending NFA for UXO 1 has not been approved by USEPA or SCDHEC.
7. Please update Table 3.
- a. Site 9, 16, 27, and 55 RI Report is conditionally approved.
 - b. Site 32 and 45 RI/FS is conditionally approved.
 - c. Site 52 is listed as being grouped with Site 14; however, there is no mention in the text. Please clarify.

Site 5 all 2013
Sep 1, 2013
Site 27 2013
Sep 14, 2013

Site 12 - 2013
Sep 25, 2013

Site 2013
May 14, 2013
May 14, 2013

Site 2013
May 14, 2013

Site 14 - 2013
May 14, 2013
Site 27 2013
May 14, 2013
Site 14 - 2013
May 14, 2013

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2013 Sep 2013 May 2013 May 2013 June 2013 May 2013 May 2013 March 2013 April 2013

2 document
on file
not listed as to indownd
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* Not enough time

