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RESPONSE TO THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS REGARDING THE DRAFT LIMITED REMEDIAL  
INVESTIGATION RCRA FACILITY INVESTIGATION WORK PLAN FOR SITE 35 DRMO  
SALVAGE YARD MCRD PARRIS ISLAND SC  
05/27/2014  
RESOLUTION CONSULTANTS

## RESPONSE TO COMMENTS

### Draft — Limited Remedial Investigation/RCRA Facility Investigation Work Plan for Site 35, DRMO Salvage Yard, MCRD Parris Island, South Carolina, dated May 2013

#### General Response:

The *Draft Limited Remedial Investigation/RCRA Facility Investigation Work Plan for Site 35, DRMO Salvage Yard, MCRD Parris Island, South Carolina* (draft work plan), as submitted for regulatory review, included the project-specific *Sampling and Analysis Plan (SAP)* as an appendix. During discussions with the Navy and the United States Environmental Protection Agency (U.S. EPA), it was determined that revising the SAP as a stand-alone work planning document would allow for the most efficient path forward. No revisions will be made to the draft work plan, since a separate work plan document is not necessary to satisfy applicable state and federal requirements or to facilitate project execution. The SAP will be revised based on responses to comprehensive regulatory comments, as presented herein, and submitted for regulatory review and approval.

#### Responses to Meredith Amick SCDHEC Comments, dated 25 June 2004

1. The 2003 sampling location (PAI-035-SS-07) on the southwest corner of the DRMO Salvage Yard fenced area confirms the findings of the 1995 sampling location PI-035-03 (50). Metals and pesticides exceed ecological screening values. One PCB (Aroclor 1260) exceeds the EPA Region IX Preliminary Remediation Goals (PRGs). The 1995 sampling location PI-035-01 (48) located approximately 100 ft from PAI-035-SS-07 and PI-035-03 (50) along the southern section of the fence also shows the presence of metals, pesticides, and PCBs in excess of ecological screening values. In addition, DDT, Aroclor 1254, and Aroclor 1260 exceed the Region IX PRGs at location PI-035-03 (50). Additional sampling for metals, pesticides, and PCBs encompassing the area of the aforementioned sampling locations is recommended. The laboratory analysis of samples collected should achieve the lowest possible detection limits.

**Response:** Such additional sampling and analysis and associated quality assurance measures have been included in the revised SAP. Please note that soil representative of historical surface soil sampling locations PI-035-03(50) and PAI-035-SS-07, collected from the low lying grassy area at the southwestern corner of the Site in 1995 and 2003 respectively, was excavated and disposed offsite during 2005 drainage improvements. Thus, analytical results associated with historical surface soil samples PI-035-03(50) and PAI-035-SS-07 are not indicative of present conditions and were not included in the previous investigations section (Worksheet #10) of the SAP. Planned soil and groundwater sampling as included in the SAP (Figures 17-1 and 17-2) adequately serves to confirm historical sampling results at PI-035-01(48) and evaluate the low-lying grassy area along the Site's southern boundary.

2. The 1995 sampling location PI-035-02 (49) along the eastern side of the fenced DRMO Salvage Yard reported the same type of contaminants found within the area of the southwest corner. Metals and pesticides exceed ecological screening values. Two PCBs, Aroclor 1254 and Aroclor 1260 exceed the EPA Region IX PRGs. Additional sampling is recommended for this area.

**Response: Such additional sampling and analysis and associated quality assurance measures have been included in the revised SAP. As depicted on Figures 17-1 and 17-2 of the SAP, soil borings SB-27, SB-28, SB-34, SB-35, SB-36, and SB-37 and monitoring well 35-MW-03, positioned along the earthen ditch at the Site's eastern boundary, will serve to evaluate soil and groundwater in the vicinity of historical surface soil sampling location PI-035-02(49).**

3. It appears that the few samples collected along the fence within the DRMO Salvage Yard have shown the potential for contaminants to be present. It is recommended the collection of additional samples at reasonable distances from each other along the entire fenced area in order to verify if potential contaminants are present and if so, that they do not exceed levels of potential concern.

**Response: Planned soil and groundwater sampling as included in the SAP (Figures 17-1 and 17-2) adequately serves to confirm results associated with historical surface soil sample, PI-035-01(48), and evaluate the low-lying grassy area at the Site's southern boundary. Sampling and analysis will be performed both inside the fenced in storage area and in the low lying grassy area outside of the fence.**

4. The soil samples collected along the intermittent stream receiving runoff from the DRMO Salvage Yard did not show great concern with metals exceedances with the exception of 035-SS-08-01 in which lead exceeds ecological screening values. This sample was collected at the outlet of the drainage pipe that would carry runoff from the DRMO Yard to the stream. An additional sample for verification purposes at the inlet of the drainage pipe is recommended.

**Response: No intermittent stream exists at the Site. During Resolution Consultants' site visits, this earthen ditch has been observed to be dry. Non-aqueous samples collected from the earthen ditch will be evaluated as surface soil media. Additional sampling and analysis in the earthen ditch has been included in the revised SAP. As depicted on Figures 17-1 and 17-2 of the SAP, soil boring SB-28 and monitoring well 35-MW07, positioned along the earthen ditch at the Site's eastern boundary, will serve to evaluate soil and groundwater in the vicinity of historical surface soil sampling location 035-SS-08-01.**

5. In general, the stream samples show high detection limits for pesticides and PCBs in excess of ecological screening values. Location 035-SS-09-01 specifically shows the highest detection limits throughout pesticides and PCBs. Detected pesticides at this location exceed ecological screening values. Also, the detection limits for PCBs exceed event the EPA Region IX PRGs. Based on the above, this location could potentially be **considered a "high-spot"**. Additional sampling is recommended for this area. The laboratory analysis of samples collected should achieve the lowest possible detection limits.

**Response: SAP text and figures revised to include additional soil samples, borings SB-27, SB-28, SB-34, SB-35, SB-36, and SB-37, in the earthen ditch.**

### **Responses to Meredith Amick SCDHEC Comments, dated 31 May 2013**

1. Please note when the current Hazardous Materials Storage Area that is in the vicinity of Site 35 is closed this area will need to be reinvestigated as a RCRA site.

**Response: Comment noted.**

2. This site is located on Horse Island. Please discuss and provide on a figure its proximity to disposal areas (including where concrete from Site 8A and 8B was disposed).

**Response: A brief discussion of disposal areas, along with a figure showing their proximity to Site 35, has been included in Worksheet #10 of the revised SAP.**

3. Please discuss and provide a location on a figure the proximity of Site 53 to Site 35.

**Response: A brief discussion of the Horse Island Debris Area (Site 53), along with a figure showing the proximity to Site 35, has been included in Worksheet #10 of the revised SAP.**

4. Please note the Parris Island Partnering Team has agreed to use the MCAS Background (2x mean, although presenting 95% UCL as well) for screening both soil and sediment. Additionally the Non Process Area Outfall data set from the Site 14 SI Report can be used to screen sediment as well.

**Response: Comment noted. Background discussion included in Worksheet #11 of the SAP has been revised accordingly.**

5. Please respond to the Department's June 25, 2004 comments and state where and how they are addressed in the document. The Department does not believe that comment #5 is addressed.

**Response: Resolution Consultants has provided specific responses to SCDHEC comments, dated 06/25/04 in this Response to Comment Memorandum.**

6. The Department references sample PI-035-03 in comment #1 of the June 25, 2004 comments; however, it does not appear that this sample is present on Figure 10-9.

**Response: Please note that soil representative of historical surface soil sampling locations PI-035-03(50) and PAI-035-SS-07, collected from the low-lying grassy area at the southwestern corner of the Site in 1995 and 2003 respectively, was excavated and disposed offsite during 2005 drainage improvements. Thus, analytical results associated with historical surface soil samples PI-035-03(50) and PAI-035-SS-07 are not indicative of present conditions and were not included in the previous investigations section (Worksheet #10) of the SAP. Planned soil and groundwater sampling as included in the SAP (Figures 17-1 and 17-2) adequately serves to confirm historical sampling results at PI-035-01(48) and evaluate the low-lying grassy area along the Site's southern boundary.**

7. Please present one figure that is an overlay of both historical samples and proposed samples.

**Response: SAP revised accordingly.**

8. Figure 3-1 and Figure 10-10: Please clarify why groundwater is considered only an offsite release. Additionally residential receptors should be shown on this figure.

**Response: Downward pointing arrows, as shown on Figure 10-10, have been added to depict onsite releases as having the potential to impact surface soil, subsurface soil, and ultimately groundwater via leaching/infiltration.**

**Per Section 10.7.3 of the SAP, there are no residences on Horse Island and the closest residences to Site 35 are MCRD Parris Island approximately 1 mile to the northwest and Port Royal approximately 1.5 miles to the south. Based on the industrial nature of the Site and the distance of the Site from the closest residence, residential receptors were not initially shown on Figure 10-10. At the request of regulators, Figure 10-10 has been revised to note that hypothetical future on-site residents will be evaluated as a potential receptor. Text in Worksheet #10 of the SAP has been revised to state that future residents are not receptors under current or expected future land use; however, they will be evaluated to provide an indication of potential risks if MCRD Parris Island were to close and be redeveloped for residential use.**

9. Section 10.4: Please clarify the use and contents of the two ASTs discussed. Specifically discuss whether they are still in service and/or if they have been previously investigated.

**Response: As stated in Section 10.2 of the SAP, two 1,500-gallon ASTs, storing used motor oil, exist at the southeastern portion of the Site. These ASTs are equipped with secondary containment. The SAP has been revised to clarify that the ASTs, which provide temporary storage for waste oil pending offsite disposal by a waste vendor, remain in active use.**

#### **Responses to Annie Gerry SCDHEC Comments, dated 5 June 2013**

On Page 4-1, Section 4.0 Project Planning- Decision Rule 2, the text states, *"If groundwater contains constituents at concentrations below PALs or poses no unacceptable risk, then no further action is required."* Since this site is currently being used as an active collection/storage area and a 90 day RCRA storage unit for hazardous materials and petroleum products, groundwater will need to be reevaluated and the site reinvestigated in the event that Site 35 closes (See Amick Comment #1).

**Response: Comment noted. SAP revised accordingly.**