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MCRD PARRIS ISLAND
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LETTER AND THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL COMMENTS REGARDING THE DRAFT SAMPLING AND ANALYSIS PLAN FOR
SUPPLEMENTAL VAPOR INTRUSION STUDY AT SITE 45 MCRD PARRIS ISLAND SC

03/25/2014

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

March 25, 2014

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 Draft SAP for Supplemental Vapor Intrusion Study at Site 45
Marine Corps 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 referenced document received January 23, 2014. Based on our review, the Department has comments. Please see the attached engineering, risk, and hydrogeology 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,



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, TtNUS

Engineering Memo
Prepared by Meredith Amick
Marine Corp Recruit Depot (MCRD)
February 26, 2014

1. Due to the fluid nature of Site 45 based on resolution of the dispute, the Department's review only reflects our comments to this pilot test field mobilization and post pilot test monitoring. Although please note that the Conceptual Site Model in future documents should be updated based on the two recently discovered floor drains in the southeastern corner of the Existing Dry Cleaning Facility.
2. Please list SCDHEC on SAP Worksheet #5.
3. The Residential/Default Attenuation Factor is listed as 0.3 on Figure 10-4 and as 0.03 on page WS 10-9. Please correct the discrepancy.



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

MEMORANDUM

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

FROM: Kent Krieg, Risk Assessor
Department of Defense Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management *KMK*

DATE: March 21, 2014

RE: Draft SAP for Supplemental Vapor Intrusion Study at Site 45
January 2014

The above referenced document by Tetra Tech has been reviewed. The Department has the following comment.

The Department believes that the proposed wording on WS 11-2 and WS 11-5 regarding OSHA mitigation may be overly restrictive, as mitigation may not be deemed necessary under OSHA regulation.

Please change the second decision statements bullet's on page WS 11-2 to state "... data will be provided to MCRD Parris Island personnel for *evaluation* under *appropriate* OSHA *protocols*."

Please remove the mitigating phrase from Decision Rule #1 on page WS 11-5 so it reads, "... and thus will be managed using appropriate OSHA protocols ~~until the occupational exposure is mitigated~~ or dry cleaning distribution center operations are discontinued.

If you need any further information, feel free to contact me at (803) 898-0255.



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: March 20, 2014

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of **Draft- Sampling and Analysis Plan, Supplemental Vapor Intrusion Study-Site 45 (Former Morale, Welfare, and Recreation Dry Cleaning Facility)** Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina dated January 2014

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.

Based on review of this document, no comments were generated.

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