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MCRD PARRIS ISLAND
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LETTER AND THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL AND ATTACHED COMMENTS REGARDING THE DRAFT REMEDIAL
INVESTIGATION REPORT FOR MUNITIONS RESPONSE PROGRAM UNEXPLODED
ORDNANCE 4 (UXO 4) FILED ARTILLERY WEST MAIN RANGE MCRD PARRIS ISLAND SC

07/18/2014

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

July 18, 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

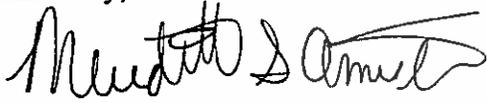
RE: Comments to UXO 4 RI Report
Marine Corps Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Owens and Mr. Harrington:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) received the above referenced document on June 2, 2014. Based on the review, the Department has comments. Please see the attached engineering 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', written in a cursive style.

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 *MA*
Marine Corps Recruit Depot (MCRD)
July 7, 2014

1. The document states that data associated with active training areas (Page Field Training Area and Elliott's Beach Training Area) within UXO 4 have been excluded from the document. The Department concurs that active training areas should not be included in an MRP site boundary as long as they are active and meet the exemptions under the Readiness and Range Preservation Initiative. However, the UXO 4 boundary was originally misidentified and data was taken within active training areas. Neither the RI Report nor the April 2014 REVA 5 Year Review (a document detailing information about active ranges) included the Page Field Training Area and Elliott's Beach Training Area data. It is important for that data to be captured and properly evaluated. The data should be submitted in a timely manner.
2. Firing Points
As noted in previous comments from the Department, All firing points will require some level of Land Use Controls (LUCs).
 - a. These LUCs include notation in the Base Master Plan, as well as notification to contractors of potential for encountering UXO or munitions debris during construction in the area. Additionally if a construction project changes the use of the area then the remedy for the individual firing point will need to be reevaluated to ensure receptor protection.
 - b. Firing Point R will require LUCs as specified in Comment 2a. Additionally anything that is found and/or constructed during the upcoming Front Gate Project should be evaluated as part of the remedy/ROD.
 - c. Please note that Firing Point F will require LUCs similar to the other firing points. Additionally once Building 730 is removed, Firing Point F should be investigated.
3. ES-2
Land Use Controls will be needed for UXO 4 with potentially different levels of LUCs based on the location within UXO 4. Please note in the interim during any activities occurring within UXO 4, workers should be notified of the risks. Additionally the Department and EPA should be notified if munitions are encountered.
4. Page 1-2
Please discuss the rationale for not performing the UXO underwater investigation during the RI. The RI WP stated that "the vertical study boundary for the aquatic investigation will be limited to the surface of the creek bottom sediment because this is the only interval reasonably expected to be accessed by human receptors"; therefore indicating potential unknowing civilian receptors.
5. Section 7.2
Ensure that receptors are considered when LUCs are evaluated. LUCs may require additional notification

(signage, flyers, etc) for “areas within the highest scoring category in the MEC Hazard Assessment...including residential, industrial, and recreational use, and many of the facilities where people may congregate...”.

6. Please clarify the statement “Unacceptable human health risks due to chromium were calculated in the Central Impact Area...”. It appears this statement only refers to residents exposed to groundwater.



Catherine B. Templeton, Director

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MEMORANDUM

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

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

DATE: July 17, 2014

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft-Remedial Investigation Report for Munitions Response Program UXO 4-Field Artillery West Main Range, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated May 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 Remedial Investigation (RI), the following comments have been generated.

COMMENTS

1. **Page 10-8, Section 10.3 Recommendations-** The text reads, *"Because it is recommended that UXO 4 proceed to an FS to evaluate remedial alternatives for MEC, which would include LUCs at a minimum, groundwater remedial alternatives at the UXO 4 Central Impact Area can also be concurrently evaluated for LUCs. "*

Please change the text to read, "... groundwater alternatives at the UXO 4 Central Impact Area can also be concurrently evaluated with LUCs."

Further, in the FS, a discussion of the evaluation of the geochemistry, tidal influences etc will need to be included to determine if groundwater remediation and/or monitoring is warranted.

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.



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 *KMIC*

DATE: June 19, 2014

RE: Remedial Investigation Report for Munitions Response Program UXO 4
May 2014

The above referenced document by TetraTech has been reviewed. The Department does not have any risk related comments.

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