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MCRD PARRIS ISLAND
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LETTER AND THE SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL
CONTROL REVIEW AND ATTACHED COMMENTS REGARDING THE DRAFT REMEDIAL
INVESTIGATION REPORT FOR MRP SITE UNEXPLODED ORDNANCE 4A (UXO 4A) MCRD
PARRIS ISLAND SC
11/22/2013
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

November 22, 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: Review of Draft Remedial Investigation Report for MRP Site UXO 4a
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 document received October 18, 2013. The Department reviewed the document and provides 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, TtNUS

Engineering Memo
Prepared by Meredith Amick *MA*
Marine Corp Recruit Depot (MCRD)
November 22, 2013

1. Section 3.3.5

The Department understands that the Range Environmental Vulnerability Assessment (REVA) is being updated. Due to the proximity of ranges in the REVA and current MRP sites, we request a copy to better understand how constituents from active ranges may be impacting MRP sites proposed for remediation.

2. Figure 3-1

Because Firing Points C, D, E, and possibly F do not lie within "Other Ranges Not in MRP" or "Training Areas," the Department believes they should be within the "UXO Site Boundaries" for UXO 4.

3. Figure 3-6

The Department believes that the island shown on this figure should be investigated as a target area. (See comment #5)

4. Figure 3-7

Based on this figure the Department would like to see the updated REVA, as it is unclear the orientation of the active ranges and whether concern over water deposition of munitions is warranted.

5. Section 5.1.1

As stated in an August 8, 2012 letter from the Department to the Navy, "Based on discussions during the team meeting July 25, 2012, the Department understands that investigation at the Rocket Range UXO 4 Subarea will also occur from the waterside (north side) of the range. This will ensure that any MEC or MD accessible by property adjacent to the creek is investigated."

It appears this investigation has not been completed. Please provide discussion and additionally note the Department feels this is necessary for public safety.

6. Section 8.2.1.1

Please note if a residential user use scenario is not evaluated, Land Use Controls for no residential reuse will be required.



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MEMORANDUM

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

FROM: Annie M. Gerry, Hydrogeologist 
Federal Facilities Groundwater Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: November 22, 2013

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of **Draft-Remedial Investigation Report for Munitions Response Program e UXO 4a-Rocket Range**, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated October 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

Based on review of this Remedial Investigation (RI), the following comments have been generated.

COMMENTS

1. **Page 4-17, Section 4.3.1.3 Soil and Sediment Quality Control Samples-** It appears that a rinsate blank sample was not collected while performing decontamination of an incremental sampling (IS) tool. The Department wants to remind the Navy that all Standard Operating Procedures (SOPs) must be followed during field work.
2. **Page 10-1, Section 10-0, Conclusions and Recommendations-** This section recommends that additional temporary wells will be installed since further investigation is required. Please be advised that the Department can only use data from permanent monitoring wells to make decisions for site remedies.

3. **Page 10-2, Section 10.0, Conclusions and Recommendations-** This section states that further investigation of metals in site media is not recommended since ecological and human health risk assessment results indicate that metal concentrations do not pose a current or future risk to potential receptors. The Department disagrees with this statement and TAL metals must be analyzed in all media, including groundwater in all future sampling events.

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.