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MCRD PARRIS ISLAND
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LETTER AND THE FINAL RESOLUTION OF OUTSTANDING OF THE SOUTH CAROLINA
DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON THE APRIL
2002 REMEDIAL INVESTIGATION/RCRA FACILITY INVESTIGATION FOR SITE/SOLID
WASTE MANAGEMENT UNIT 45 (SWMU 45) FORMER MWR DRY CLEANING FACILITY
MCRD PARRIS ISLAND SC
09/23/2004
TETRA TECH NUS INC



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PITT-09-4-044

September 23, 2004

Project Number N0502

Commander, Southern Division
Naval Facilities Engineering Command
ATTN: Mr. Art Sanford (Code ES32)
2155 Eagle Drive
North Charleston, South Carolina 29406

Reference: CLEAN Contract No. N62467-94-D-0888
Contract Task Order No. 0127

Subject: Resolve Final Comments for Site/SWMU 45 RI
MCRD Parris Island, South Carolina

Dear Mr. Sanford:

Please find attached documentation for final resolution of outstanding SCDHEC review comments on the April 2002 RFI/RI for Site/SWMU 45. Following a prior RTC cycle, SCDHEC identified several outstanding issues in their letter of May 26, 2004. The final responses (attached) were agreed through email correspondence also attached. The final report is in preparation.

We are addressing the state's copies to Mr. John Litton and we ask that he distribute one copy to Mr. Leon Fulmer and one copy to Mr. Don Hargrove.

If you have any questions or comments, please call me at (412) 921-8216.

Sincerely,

Mark Sladic, P.E.
Task Order Manager

MS/kf

Enclosure

cc: Mr. T. Harrington, MCRD Parris Island (five copies)
Mrs. P. Goldberg, U.S. EPA (one copy)
Mr. J. Litton, SCDHEC (one copy)
Mr. L. Fulmer, SCDHEC (one copy)
Mr. D. Hargrove, SCDHEC (one copy)
Ms. P. Wendt, SCDNR (one copy)
Mr. T. Dillon, NOAA (one copy)
Ms. D. Duncan, USFWS (one copy)
Mr. M. McRae, Parallax (one copy)
Ms. Debra M. Humbert, TtNUS (w/o attachment)
Mr. M. Perry/File N5260, TtNUS (one copy)

**RESPONSE TO SCDHEC COMMENTS
DRAFT REMEDIAL INVESTIGATION/RCRA FACILITY INVESTIGATION REPORT
SITE/SWMU 45 – FORMER MWR DRY CLEANING FACILITY
MCRD PARRIS ISLAND, SC**

GENERAL COMMENTS

1. **Comment:** Response acceptable.

Response: No further response.

2. **Comment:** Response acceptable.

Response: No further response.

SPECIFIC COMMENTS:

3. **Comment:** This response states that there is no obvious migration of contamination at the site. How does this statement correlate to the most recent groundwater sampling data discussed in team meetings showing that the contaminant plume has moved?

Response: The original response was to add the following sentence to the report: 'Based on approximately 5 years of monitoring data, there is no obvious migration of groundwater contamination.' Per SCDHECs recent comment, the sentence will be revised to the following: 'Based on five years of monitoring data from 1996 through 2001, there was no obvious migration of groundwater contamination, however, sampling at one location in early 2003 did indicate that some downgradient migration had occurred. The Navy has since provided funding for additional field activities that will update the the plume maps in a future report.'

4. **Comment:** This response references EPA SSL Guidance, which recommends a DAF of 20. Given the site-specific information provided in Appendix E, page 3-11, the DAF at Site/SWMU 45 is approximately equal to 1 (see attached calculations). Please revise the document accordingly.

Response: The RI/RFI will be revised utilizing a DAF of 1.

5. **Comment:** This response states that metals, pesticides, and PCBs were not present at the site and therefore were not evaluated. Could the volatile organic compounds released at the site have potentially mobilized metals in the soils. If this scenario is possible, it is recommended that metals be included in the evaluation.

Response: Typically, a significant change in groundwater pH would be required to mobilize metals. No significant pH changes have been noted in site groundwater. No change to the RI/RFI Report is required.

6. **Comment:** Response acceptable.

Response: No further response.