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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON INTERIM RESOURCE CONSERVATION
AND RECOVERY ACT FACILITY ASSESSMENT REPORT WITH ATTACHMENTS MCRD
PARRIS ISLAND SC
7/18/1995
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

01.01.00.0016

SSA
7/2/95

South Carolina
DHEC
Department of Health and Environmental Control
2600 Bull Street, Columbia, SC 29201

Commissioner: Douglas E. Bryant
Board: John H. Burriss, Chairman
Sandra J. Molander, Secretary

Richard E. Jabbour, DDS
William M. Hull, Jr., MD
Roger Leaks, Jr.

Promoting Health, Protecting the Environment

CERTIFIED MAIL

18 July 95

Commanding General/MCRD/ERR
ATTN: AC/SI&L (NREAO)
P. O. Box 19001
Parris Island, SC 29905-9001

RE: Interim RCRA Facility Assessment (RFA) Report for the Marine Corps Recruit Depot dated 4 April 1990.

Dear Commanding General:

The Bureau of Solid and Hazardous Waste Management of the South Carolina Department of Health and Environmental Control (Department) has reviewed the above-referenced submittal with respect to the requirements of R.61-79 of the South Carolina Hazardous Waste Management Regulations, the EPA RCRA Facility Assessment Guidance document dated October 1988, and the EPA Region IV Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (SOP/QAM) dated 1 February 1991.

In addition, the Department has reviewed the MCRD memorandum dated 12 June 95 (SUBJ: National Priority List (NPL) Meeting of 8 June 95) detailing the results of the MCRD Site Screening Exercise of 6 & 7 June 95. A draft of the correspondence's contents was presented to the Department during the 8 June 95 meeting at the MCRD in which the Department, the Environmental Protection Agency, and MCRD base personnel were represented. Based upon the results of the review, the Department has made one of the following determinations for each of the solid waste management units (SWMUs) listed in the Interim RFA dated 4 April 90 (Comments on a number of SWMUs are also listed below and SWMU-specific decisions are listed in the Attachment).

1. No Further Action (NFA)
 - a. The Department concurred with the MCRD NFA recommendation for the Dredge Spoils Area Fire Training Area (SWMU 4) in correspondence (Baize to Nabors) dated 23 August 89.
 - b. The Department concurs with the MCRD recommendation for NFA at the Inert Disposal Area A (SWMU 11) and the Inert Disposal Area B (SWMU

12). These landfills were permitted by the state (Domestic Waste Permit Numbers 909 and 905, respectively) and reportedly managed only cellulosic construction debris and yard waste.

- c. The Department concurred with the MCRD NFA recommendation for the Daylight Infiltration Course in correspondence (Baize to Nabors) dated 23 August 89. Please note that this site has been listed on page ten of the MCRD memorandum dated 12 June 95.

2. RCRA Facility Assessment Addendum (RFA Addendum)

The Department was unable to make final decisions on a number of SWMUs due to insufficient information. A more comprehensive RFA than the assessments reported in the 4 April 90 Interim RFA is warranted at the following SWMUs (a more comprehensive RFA would include more detailed descriptions of the SWMU or historical analytical data).

- a. The Department concurs with the MCRD and Environmental Protection Agency recommendation to further assess the Jericho Island Disposal Area (SWMU 10).
- b. The MCRD indicated that analytical data may be available for the Equipment Parade Deck Satellite Accumulation Area (SWMU 27) [location of a Polychlorinated Biphenyl (PCB) spill], the PCB Spill Area A (AOC A), and the PCB Spill Area B (AOC B).

Should analytical data or other relevant information become available from the MCRD file search, this information should be incorporated in the RFA Addendum. Should analytical data not be available for the sites, then RCRA Facility Assessment Confirmatory Sampling is required.

- c. The Department concurs with the MCRD and Environmental Protection Agency recommendation to further assess the Electrolyte Basin (SWMU 39).

3. RCRA Facility Assessment Confirmatory Sampling (RFA CS)

- a. RFA CS is required for the groundwater at the Inert Disposal Area C (SWMU 13). The limited sampling at the Dredge Spoils Area Fire Training Pit (SWMU 4) which underlies SWMU 13 was reported in the Remedial Investigation Verification Step dated April 1989. The investigation, however, did not include sampling of the groundwater at

SWMU 13.

- b. The Department generally requires investigation of oil/water separators to be managed by this Bureau as RCRA Subtitle C SWMUs; the Weapons Power Plant Oil/Water Separator (SWMU 21) requires RFA CS.
- c. The Laundry Satellite Accumulation Area (SWMU 32) minimally requires RFA CS. The MCRD may perform RFA CS at SWMU 32 in an effort to eliminate this SWMU from further investigation or combine the investigation at SWMU 32 with the required RCRA Facility Investigation at the Dry Cleaning Facility Spills Area (SWMU 45). Please note the following comments.
 - i. There is high potential that SWMU 32 may be a contributing source unit for known tetrachloroethylene (PCE) contamination reported at SWMU 45, as SWMU 32 is located in close proximity and reportedly managed large quantities of PCE (Interim RFA, April 1990).
 - ii. The Tetrachloroethylene Contamination Assessment and Conceptual Corrective Action Plan dated June 1994 concluded that additional releases of lesser magnitude may have occurred at SWMU 45 over a period of time due to the size of the PCE groundwater plume and soils conditions.

4. RCRA Facility Investigation (RFI)

Self-explanatory. See the RCRA Facility Investigation Guidance document (EPA-530/SW-89-031).

5. RCRA Hazardous Waste Management Unit Closure (RCRA Closure)

The Hazardous Waste Storage Building (SWMU 36) is undergoing closure activities per the South Carolina Hazardous Waste Management Regulations. Provided there is no groundwater contamination at the interim status hazardous waste management unit, SWMU 36 will not be addressed under the MCRD's RCRA corrective action program.

6. State Underground Storage Tank Program (State UST)

As the contamination at certain SWMUs evidences primarily petroleum contamination or chemical constituents of petroleum products and the SWMUs

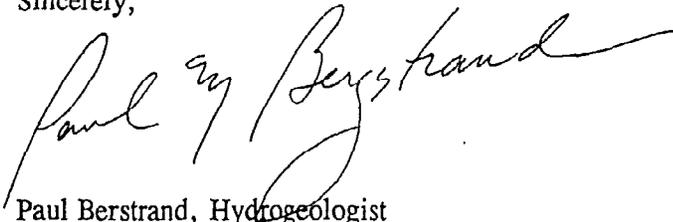
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reportedly managed only virgin petroleum products, the SWMUs in Attachment 1 with the State Underground Storage Tank (State UST) designation will be managed by Mr. Tim Mettlen in the Department's Groundwater Protection Division (GWPD). Noting the following Bureau comments, further correspondence concerning these SWMUs should be directed to Mr. Mettlen.

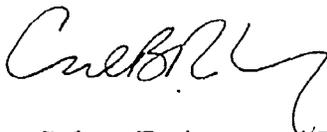
- a. In response to the MCRD's Closure Report dated 13 October 92, the Department concurred with the recommendations for further assessment at the Former Automotive Hobby Shop Spill Area (SWMU 6) in correspondence (McInnis to Commanding General) dated 24 Nov 92.
- b. Soil sampling activities are required at the Gasoline Spill Area (AOC C).
- c. The Department required further tank removal/assessment activities to be coordinated with the Department's GWPD at the Page Field Tanks (SWMUs 17 and 18) and the MCX Service Station (AOC D) in correspondence (Baize to Nabors) dated 23 August 89.

The Department appreciates the opportunity to comment on these submittals and looks forward to reviewing the submittal of the RCRA Facility Assessment (RFA) Addendum which will contain the SWMUs listed in the attachment (See Comment 2 above) and proposed for further assessment in the MCRD memorandum of 12 June 95. Should there be any questions, please contact Paul Bergstrand at (803)896-4016 or Brent Rabon at (803)896-4179.

Sincerely,



Paul Bergstrand, Hydrogeologist
Hazardous Waste Section
Bureau of Solid and Hazardous Waste Management



Brent Rabon, Environmental Engineer
Hazardous Waste Permitting Section
Bureau of Solid and Hazardous Waste Management

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Attachment

cc: Mr. Jay Bassett, EPA Region IV
Mr. Russell Berry, SCDHEC-Low Country
Mr. Scott Glass, Southern Division
Mr. Tim Mettlen, SCDHEC

**SCDHEC Final Determinations on the Interim RCRA Facility Assessment
dated 4 April 90 for the Marine Corps Recruit Depot**

SWMU NUMBER	SWMU NAME	SCDHEC DETERMINATION
1	Incinerator Landfill	RFI
2	Borrow Pit Landfill	RFI
3	Causeway Landfill	RFI
4	Dredge Spoils Area Fire Training Area	NFA
5	Former Paint Shop Disposal Area	RFA CS
6	Former Automotive Hobby Shop Spill Area	State UST
7	Page Field Fire Training Pit	RFA CS
8	Paint Waste Storage Area	RFA CS
9	MCX Service Station Spill Area	State UST
10	Jericho Island Disposal Area	RFA Addendum
11	Inert Disposal Area A	NFA
12	Inert Disposal Area B	NFA
13	Inert Disposal Area C	RFA CS
14	Storm Sewer System	RFA CS
15	Dirt Roads	RFI (in coordination with SWMU 2) ¹
16	Pesticide Rinsate Disposal Area	RFI
17	Page Field Tanks (AS-16)	State UST
18	Page Field Tanks (AS-17)	State UST
19	Diesel Shop Vehicle Washing Pad	NFA
20	Power Station Oil/Water Separator	NFA
21	Weapons Power Plant Oil/Water Separator	RFA CS
22	Motor Car Transport Car Wash	NFA

23	Indoor Dental Lab Satellite Accumulation Area	NFA
24	Dental Lab Satellite Accumulation Area	NFA
25	Paint Shop Satellite Accumulation Area	NFA
26	Pesticide Satellite Accumulation Area	NFA
27	Equipment Parade Deck Satellite Accumulation Area	RFA Addendum
28	Power Station Satellite Accumulation Area	State UST
29	Indoor Motor Pool Satellite Accumulation Area	NFA
30	Empty Drum Storage Area	NFA
31	Weapons Power Plant Satellite Accumulation Area	NFA
32	Laundry Satellite Accumulation Area	RFA CS
33	Outdoor Motor Pool Satellite Accumulation Area	NFA
34	Motor Pool Waste Oil Tank	NFA
35	DRMO Salvage Yard	RFA CS
36	Hazardous Waste Storage Building	RCRA Closure
37	Overflow Storage Pad	NFA
38	Underground Waste Oil Tank	State UST
39	Electrolyte Basin	RFA Addendum
40	Sanitary Wastewater Treatment Plant	NFA
41	Former Incinerator	RFI (in coordination with SWMU 1)
42	Sanitary Sewer System	NFA
43	Motor Pool Underground Waste Oil Tank	State UST

44	Dumpsters	NFA
AOC A	PCB Spill Area A	RFA Addendum
AOC B	PCB Spill Area B	RFA Addendum
AOC C	Gasoline Spill Area	State UST
AOC D	MCX Service Station	State UST
45	Dry Cleaning Facility Spills Area	RFI

¹SCDHEC will make a final decision on remaining dirt roads upon review of the analytical data to be collected from the dirt road at SWMU 2.

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