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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES
COMMENTS ON RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION/REMEDIATION INVESTIGATION WORK PLAN FOR SITE 3 MCRD PARRIS
ISLAND SC
1/5/1998
SOUTH CAROLINA DEPARTMENT OF NATURAL RESOURCES

South Carolina Department of
Natural Resources



Paul A. Sandifer, Ph.D.
 Director
 John V. Miglarese
 Deputy Director for
 Marine Resources

January 5, 1998

Mr. Mark P. Speranza
 Brown & Root Environmental
 Foster Plaza VII
 661 Anderson Dr.
 Pittsburgh, PA 15220-2745

RE: RCRA Facility Investigation/
 Remedial Investigation Workplan for
 Site 3 - Causeway Landfill;
 MCRD Parris Island;
 Beaufort County, S.C.

Dear Mr. Speranza:

Personnel with the S.C. Department of Natural Resources (SCDNR) have reviewed the above referenced document and offer the following comments.

The SCDNR concurs with all comments on the site-specific workplan made by NOAA's Coastal Resource Coordinator in his memorandum dated 12/17/97. The SCDNR also requests involvement in the selection of locations for the collection of background sediment samples, and may have additional comments regarding the number and location of samples following the January 21 site visit. In addition, the SCDNR has the following comments on the site-specific workplan:

(page, paragraph, line)

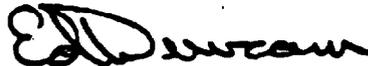
- (1-1, 4, 2) Since the Causeway Landfill was constructed directly through tidal marshes and across a tidal creek (Ribbon Creek) that is tributary to Class SFH water (the Broad River) which is, by definition, "protected for shellfish harvesting" in addition to other forms of primary and secondary contact recreation, it would seem appropriate to include "adult, adolescent, and child recreational users" among the list of potential receptors in the human health risk assessment.
- (2-1, 3, 9) Please clarify whether or not any fill material (clean or otherwise) was used to

cover the unpaved portions of the landfill (i.e., the shoulders and banks of the causeway) after disposal activities were discontinued in 1972. If fill material was used, any information on its composition, volume, depth, or areal coverage should be included.

- (2-9, Section 2.3.4) Include a table summarizing the analytical results of the ABB (1993) Extended Site Inspection Report; include species analyzed, location (pond vs. tidal creek), contaminant concentrations measured, and appropriate USFDA action levels.
- (5-1, 3, 7) The removal of groundwater that is "not potable" from an assessment of human health risk may be inappropriate, if it is demonstrated that there is a connection between any such groundwater and surface waters that are used for primary and secondary recreation.
- (5-2, paragraph 1) For the sake of consistency with our recommended changes to the workplans for Sites 1 and 2, replace "Recreational Users" with "Adult, Adolescent and Child Recreational Users". Also for consistency, replace "Fish: consumption" with "Finfish/Shellfish: ingestion". Include ingestion of, and dermal contact with, sediment and surface water as additional pathways of concern in the human health risk assessment for this group.
- (5-2, 6, 2) Replace "could warrant further consideration during..." with "will be considered within the context of...".

We hope you find these comments helpful. If you have any questions, please contact Priscilla Wendt, the SCDNR project manager for this site, at 803-762-5068.

Sincerely,



Robert E. Duncan
Environmental Programs Director

cc: Timothy J. Harrington, MCRD Parris Island
Arthur F. Sanford, SOUTHNAVFAC
Kenneth Lapierre, USEPA Region 4
Susan Peterson, SCDHEC
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Tom Dillon, NOAA
Diane Duncan, USFWS