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MCRD PARRIS ISLAND
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LETTER AND MEMORANDUM REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH
AND ENVIRONMENTAL CONTROL COMMENTS ON REMEDIAL
INVESTIGATION/RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION FOR SITE 3 MCRD PARRIS ISLAND SC
1/27/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

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19.01.03.0013

January 27, 2000

Commanding Officer
Department of the Navy
SOUTHNAVFACENGCOM
ATTN: Mr. Art Sanford
2155 Eagle Drive
North Charleston, South Carolina 29406

RE: Final RCRA Facilities Investigation/Remedial Investigation for Site/SWMU 3-Causeway Landfill (11/99)
Marine Corp Recruit Depot
Parris Island
SC6 170 022 762

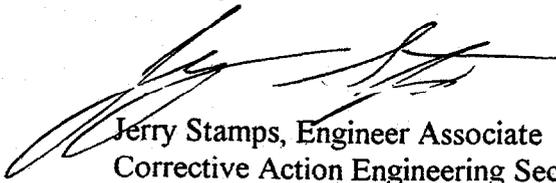
Dear Mr. Sanford:

The Corrective Action Engineering and the Hydrogeology Sections of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document, which was received on November 8, 1999. The Department has determined that the following comments must be adequately addressed prior to receiving final approval:

1. Typically, the Department is accustomed to reviewing the Remedial Goal Options (RGOs) for Constituents Of Concern (COCs) near the conclusion of the Baseline Human Health Risk Assessment (BHHRA). For future reference, please incorporate a refined list of COCs and their respective RGOs into the BHHRA. This information may be repeated in the CMS if desired.
2. Approval of this document is contingent upon adequate responses to the comments from the Division of Hydrogeology.

If you have any questions or concerns, please feel free to contact Jerry Stamps at (803) 896-4285 or Don Hargrove of the Division of Hydrogeology at (803) 896-4033.

Sincerely,



Jerry Stamps, Engineer Associate
Corrective Action Engineering Section
Division of Hazardous and Infectious Waste Management

cc:

David Brayack, TtNUS
Tim Harrington, MCRD Parris Island
Don Hargrove, Hydrogeology
Ken Lapierre, EPA Region IV
Tom Dillon, NOAA
Priscilla Wendt, SCDNR



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2600 Bull Street
Columbia, SC 29201-1708

MEMORANDUM

TO: Jerry Stamps, Engineering Associate
Corrective Action Engineering Section
Division of Hazardous and Infectious Waste Management
Bureau of Land and Waste Management

FROM: Donald C. Hargrove, Hydrogeologist
Hazardous Waste Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: 16 December 1999

RE: Parris Island Marine Corps Recruit Depot (MCRD)
Parris Island, South Carolina
Beaufort County
SC6 170 022 767

FINAL RCRA Facilities Investigation (RFI)/Remedial Investigation (RI) for
Site/SWMU 3 - Causeway Landfill
(November, 1999)

The Division of Hydrogeology has reviewed the DRAFT RCRA Facilities Investigation (RFI)/Remedial Investigation (RI) for Site/SWMU 3 - Causeway Landfill at MCRD. This report (dated November 1999) was received on 8 November 1999. This document contains comments and responses to comments that were generated upon review of the DRAFT version.

The Division of Hydrogeology found the responses to comments, and their incorporation into the revised report, acceptable with the exception of the comments contained herein. These comments should be addressed, and replacement pages submitted for review prior, to approval of this document.

- 7) Response accepted with the stipulation that further sampling must be an integral part of the remedial design process.
- 11) Appendix A-3, Well Installation Records:
 - c) The Monitoring Well Sheets indicate that all four of the monitoring wells constructed for

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this RFI were installed as flush-mount wells. The approved work plan specifies that monitoring wells with above grade stick ups would be installed. These deviations from the approved work plan should be specified and explained in Section 3.1, Deviations From the Work Plan.

In the future, MCRD should note that flush mount wells are a non-standard design and prior approval by the Department must be given and duly indicated in the monitoring well approval before said wells can be constructed.

Response: The stickup and posts were not installed at Site 3 because they would have interfered with traffic flow. This discussion will be added to Section 3.1.

This response does not answer the comment. The Division of Hydrogeology understands that certain circumstances require the use of flush-mount wells, and agrees that SWMU 3 fits those circumstances. However, the problem is that the work plan specifies that all the wells at SWMU 3 would be installed with stickups and guard posts. The concerns here are that:

- 1) This is a deviation from the work plan that has not been adequately documented;
- 2) In order for a monitoring well approval to be written that specifically allows for flush-mount construction (a non standard design in South Carolina), it must be clearly specified in the work plan or monitoring well approval request.

Please revise the report to indicate that the flush-mount installation was a deviation from the approved work plan. It should also be acknowledged that when warranted, MCRD will specifically request monitoring well approvals that allow for the installation of flush-mount wells.

Please also note that the response to comment section incorrectly lists this as comment B12-c and revise accordingly.

12) Appendix A-10, Groundwater Sample Log Sheets:

This comment is incorrectly listed as comment 13 in the response to comments. Please revise accordingly.

If you have any questions concerning these comments, please contact me at (803)896-4033.