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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON PROPOSED PLAN FOR SITE 3 CAUSEWAY
LANDFILL MCRD PARRIS ISLAND SC
5/22/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street
Columbia, SC 29201-1708

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04.01.03.0001

May 22, 2000

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

RE: Proposed Plan for Site/SWMU 3(4/00)
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 at the April 19, 2000 Tier I Meeting. The Department has determined that the following comments must be adequately addressed prior to receiving final approval:

1. General

The proposed plan must be modified to reflect the new approach discussed during the week of April 24, 2000 concerning extending the cover immediately to the "clean line" as determined in the RFI. This approach is in lieu of the approach discussed in the April 19, 2000 team meeting.

2. Page 1, Clean-Up Proposal, 4th bullet

Please change the reference to "site restrictions" to "Land Use Controls".

3. Page 2, This Document, Typographical Error

Please remove the "s" from the word "Controls" so as to read "South Carolina Department of Health and Environmental Control".

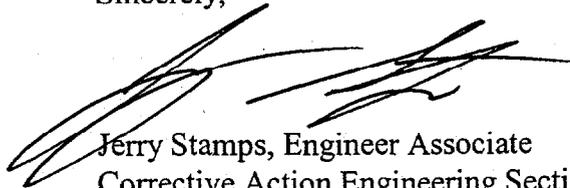
4. Page 3, #2 Soil Cover

The amount of soil cover required is still contingent upon adequate soil cover characterization. It must be demonstrated that a minimum of 2 feet of clean soil exists to protect human health. Ensuring that 2 feet of clean soil cover exists should also be protective of the ecology.

5. Page 3, #3 Sediment Testing and Excavation
This section discusses various remedial alternatives based upon the magnitude of sediment clean-up goal exceedances. For instance, it is stated that natural biodegradation will be chosen if contaminant concentrations exceed the clean-up goals by a factor of “_ to _”. Please explain what scientific basis will be implemented in determining what level of exceedance is appropriate for each remedial alternative.
6. Page 3, #4, Institutional Controls and Long-Term Monitoring
Please change the reference to “Institutional Controls” in the title to “Land Use Controls”. Additionally, change the reference to “site restrictions” to “land use controls”. Furthermore, a discussion of the LUCAP should be included in this section.
7. Page 4, 1st full paragraph, 4th sentence, Typographical error
Include a space between the words “and” and “arsenic”.
8. Page 6, Clean-Up Alternatives, Containment
Please include a discussion of the procedures to be implemented to ensure the integrity of the cover.
9. Page 8, Long Term Reliability and Effectiveness, 1st bullet
Please change the reference to “site restrictions” to “land use controls”.
10. Page 8, Short-Term Effectiveness, 1st bullet, Typographical Error, 3rd sentence
The sentence should read “...in short term than ...” instead of “... in short term that ...”.

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

Rob Pope, EPA Region IV
Tom Dillon, NOAA
Priscilla Wendt, SCDNR