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MEMORANDUM AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL COMMENTS ON DRAFT REMEDIAL INVESTIGATION /RESOURCE CONSERVATION AND RECOVERY ACT FACILITY INVESTIGATION FOR SITES 1 AND 41 MCRD PARRIS ISLAND SC
9/8/2000
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

D H E C
PROMOTE PROTECT PROSPER
2600 Bull Street
Columbia, SC 29201-1708

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ID-194

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: 8 September, 2000

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

DRAFT Remedial Investigation (RI)/RCRA Facilities Investigation (RFI) for Site/SWMU 1 - Incinerator Landfill, and SWMU 41 - Former Incinerator
(December, 1999)

The Division of Hydrogeology has reviewed the above referenced document, dated 22 March, 2000. This document was received on 28 March, 2000. It provides a physical description of Site/SWMU 1 and SWMU 41 that include the known histories of these two sites, and the suggested location of SWMU 41. It briefly describes previous studies performed at these sites, and presents analytical data generated during this current RI/RFI.

This document was reviewed with respect to R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents.

The Division of Hydrogeology found this report technically inadequate. Comments were going to be written concerning field logs, monitoring well development and purging procedures, and Chain of Custody Forms. However, comments generated during this review mirror some of the comments by the EPA (letter: Pope to Cheney, dated 31 August, 2000). The Division does not wish to reiterate comments already generated by another reviewer, and therefore concurs with the EPA's comments. Responses to said comments will be reviewed upon their submittal.

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

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MEMORANDUM

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

FROM: Susan K. Byrd, Risk Assessor Susan Byrd
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: August 8, 2000

RE: Marine Corp Recruit Depot
Parris Island, South Carolina

Document:
RCRA Facility Investigation / Remedial Investigation
Site/SWMU 1 and SWMU 41
Volumes I and II
March 2000

The above referenced document by Tetratech NUS, Inc. has been reviewed. The following comments pertain to the human health and ecological risk assessment.

GENERAL COMMENTS:

1. Page 3-1 and 3-2, Section 3.1-Deviations From the Work Plan: Explain in more detail the specific reasons for deviating from the work plan. For example, please provide details for why the two soil sample locations were moved at SWMU 41, and provide information why the sediment samples were not analyzed for hexavalent chromium.

2. Page 3-5, Section 3.2.6-Surface Water Sampling: Please explain why dioxin samples were not collected during this investigation. SWMU 1 and 41 disposal histories indicate that dioxin samples are warranted. If samples were analyzed for dioxins, please discuss the results and sample locations.

SPECIFIC COMMENTS:

1. Page 2-3, Section 2.7 – Ecology: As discussed in the teleconferencing call on July 31, 2000, the RFI report should be written as a stand alone document. In future documents, avoid referring the reader to previously written documents and summarize the pertinent information from the referenced document.

2. Page 3-4, Section 3.2.4-Surface Water Sampling, Paragraph 2: The text states that elevated turbidity in the surface water samples was unavoidable due to the sampler walking to the sampling location. In order to decrease the amount of turbidity, always enter a sample location from downstream. Time should be allotted to allow for the turbidity to settle and migrate "downstream" prior to filling sample containers.

3. Page 6-11, Section 6.2.3.5, Ingestion of Fish : Since the extent of contamination has not been delineated in the surface water and the sediment in relation to the low tide line (not indicated on sample locations map), the rationale presented for excluding this pathway is not justified. If it is determined that contamination has not migrated from the site to the low tidal waters, then this rationale is appropriate.

4. Page 7-8, Section 7.3.3.7: Response to comments from future reports as well as previous team meetings (April 20, 2000) indicate that smaller wading birds such as the green heron or the little blue heron would be used in ecological risk assessments due to smaller home ranges and greater food ingestion rates in relation to body weight. Since the smaller wading birds are better suited receptors for potential hazardous waste sites, please revise the section and calculations pertaining to the great blue heron.

5. Page 7-26, Section 7.8.1-Volatile Organic Compounds, Paragraph 2: The text recommend that acetone be dropped from further consideration since it is a common laboratory contaminant. Please include the levels of detections of acetone in the various blank samples in the body of the text of the report.

6. Page 7-27, Section 7.8.1-Carbon disulfide: The text states that carbon disulfide may not be due to site-related contamination and should be dropped from further consideration. Since the waste disposal practices at the site are not known, and since no ESV is available for carbon disulfide, this compound should be retained unless additional information is provided for its exclusion.

7. Page 7-30, Section 7.8.2-PAH Compounds: The text states that that various other "sources" may have influenced the PAH detections in sediment samples especially in the vicinity of SD-017-01. Sampling strategies should have been modified and additional "biased" samples should have been collected to control for other influences especially nearby drainage channels.

8. Page 7-47, Section 7.9.1-Uncertainty: The text states that more than one source may be

influencing the site. As stated in specific comment 7, without analytical data controlling for off-site sources, this is not a valid rationale. The samples should have been moved to more suitable locations to determine site influence or used as control samples for the off-site sources.

If you need any further information, feel free to contact me at (803) 896-4188.