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MCRD PARRIS ISLAND  
5090.3a

LETTER REGARDING 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  
9/27/2000  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



1600 Bull Street  
Columbia, SC 29201-1708

1D-195  
19.01.01.0006

September 27, 2000

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

RE: Draft Remedial Investigation (RI) / RCRA Facilities Investigation (RFI) for Site/SWMU 1 – Incinerator Landfill and SWMU 41 – Former Incinerator (3/00)  
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 on March 28, 2000. The Department has determined that the following comments must be adequately addressed prior to receiving final approval:

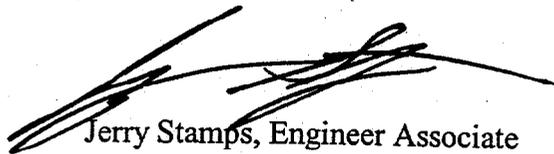
1. **General**  
If this investigation was conducted with the intent to implement the presumptive remedy for landfills, please indicate as such within the body of the report.
2. **General, Figures**  
The yellow line in the figures appears to represent the boundary of the landfill; however, nothing in the legend identifies this line as such. Additionally, the figures should identify the fluctuations in surface water elevations resulting from tidal influences. This is particularly necessary for those figures presenting the surface water and sediment contamination.
3. **Section 2.7**  
This section includes an inadequate discussion of the site-specific ecology. At a minimum, this section should reference the Ecological Risk Assessment included in Section 7.

4. Section 3.1, 4<sup>th</sup> bullet, 6<sup>th</sup> bullet  
This section should discuss the reasons for any deviations from the approved work plan rather than simply stating the deviations.
5. Section 3.2.3  
This section states that a creosote odor was observed at PAI-01-SB-02 and PAI-01-SB-03. Additionally, several samples had elevated PID readings. Please explain why these samples were not collected for laboratory analysis for the purposes of delineating nature and extent of contamination.
6. Section 3.2.5, 1<sup>st</sup> paragraph, typographical error  
The sediment sample locations are illustrated in Figure 3-2 rather than Figure 3-3. Please revise accordingly.
7. Figure 3-3 and Section 3.2.5  
It is difficult to decipher what areas were impacted by the debris such as glass and ash. Please clarify the figure.
8. Section 3.2.5, last paragraph, typographical  
It appears as though the term "representative concentration" should be "representative locations". Please revise accordingly.
9. Section 3.2.6, 1<sup>st</sup> paragraph  
Please incorporate a figure illustrating the location of the picnic area and associated sample locations relative to SWMU 1. Additionally, the first paragraph should clearly state that the samples collected from the picnic area were collected for background purposes.
10. Section 3.2.12, Holding Times  
Please explain why numerous holding times were exceeded.
11. Table 3-5  
Please explain why sample PAI-01-SW-08-00 was not sampled for surface water quality parameters.
12. Section 4.1.3  
This section states that bis(2-ethylhexyl)phthalate was detected at concentrations exceeding the "background level"; however, there was no discussion of the levels detected in the blank, if any. For the sake of comparison, please include a discussion of the detections of bis(2-ethylhexyl)phthalate in the blank.

13. Section 4.1.4, Figure 4-4  
Please be advised that additional sediment samples may be necessary pending the outcome of the ecological subgroup.

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