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LETTER AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL  
CONTROL COMMENTS REGARDING TECHNICAL INADEQUACY FOR DRAFT PROPOSED  
PLAN FOR WASTE, SOIL AND SEDIMENT REMEDIAL ACTION AT SITE 12 MCRD PARRIS  
ISLAND SC  
4/13/2005  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



2600 Bull Street  
Columbia, SC 29201-1708

April 13, 2005

Art Sanford  
NAVFAC EFD SOUTH  
2155 Eagle Drive  
North Charleston, SC 29406

**RE:** **NOTI** – Notice of Technical Inadequacy  
DRAFT Proposed Plan for Waste, Soil, and Sediment Remedial Action at Site 12/SWMU  
10-Jericho Island Disposal Area (May 2004)  
Parris Island Marine Corp Recruit Depot (MCRD)  
Parris Island, South Carolina  
SC6 170 022 767

Dear Mr. Sanford:

The South Carolina Department of Health and Environmental Control (Department) received the above referenced draft proposed plan on July 1, 2004. The Department reviewed plan with respect to the applicable sections of the South Carolina Hazardous Waste Management Regulations (SCHWMR). Based on this review, the Department has determined that revisions are necessary. Please refer to the attached engineering comments and memoranda prepared by Don Hargrove.

The response to these comments can either consist of revision pages to be inserted in the Draft Report or a new document. If revision pages are submitted, each page should be coded; for example, 32(R-2/13/03) would be page 32, revised 2/13/03. In addition to the revisions, revised response to comments and a summary of changes to the document should be submitted. If you have any questions regarding this issue, please contact me at (803) 896-4192.

Sincerely,

Leon F. Fulmer, Jr.  
Corrective Action Engineering Section  
Division of Waste Management  
SCDHEC

Cc: Don Hargrove, Hydrogeology – SCDHEC  
Tim Harrington, MCRD Parris Island  
Mac McRae, Parallax, Inc.  
Mark Sladic, TtNUS  
Lila Koroma-Llamas, USEPA

# ENGINEERING COMMENTS

Parris Island Marine Recruit Depot  
DRAFT Proposed Plan Site 12/SWMU 10  
Dated May 2004

Prepared By: Leon F. Fulmer, Jr.  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management  
April 13, 2005

## General Comment

1. Several dates in reference to the Final CMS document and the public comment period are left blank through out the document. All appropriate dates should be incorporated into the document.

## Specific Comments

2. (**Introduction Pg. 2**) The second paragraph should clearly state the indicated dates encompass a 60-day public comment period. John Litton from SCDHEC should be added as a point of contact for comments. All other sections should be modified accordingly.
3. (**Scope and Role of the Proposed Action Pg. 2**) The first paragraph should indicate the exact number of sites/SWMUs and/or AOCs at the facility rather than an approximate number.
4. (**Excavated Surface Debris, Soil, and Sediment Pg. 5**) The last sentence of the first paragraph suggests that access to the site will be cut off with the excavation of the causeway. Please clarify.
5. (**Excavated Surface Debris, Soil, and Sediment Pg. 5**) The last paragraph state the 1.6 acres of wetlands would be restored upon completion of the excavation activities. However, there is no mention of any required wetlands permits. Please clarify.
6. (**Transport Excavated Material to an Approved Facility Pg. 5**) The section mentions all excavated material would be characterized to determine the appropriate disposal facility. In the event that hazardous waste is encountered/characterized for disposal, the associated disposal manifests should be provided to the Department.

7. **(Human Health Risk Assessment Pg. 7)** The last sentence states, "Under other exposure scenarios, cancer and non-cancer risks were within acceptable ranges." In order to clarify the statement, the specific exposure scenarios should be indicated in parenthesis.
8. **(Cost Table Pg. 18)** The previous paragraph indicated the LUCs were factored into the associated costs for the various alternatives. However, it is unclear how these costs were estimated (i.e. not specifically noted).
9. **(For More Detailed Information Pg. 19)** The SCDHEC district office should be included.



2600 Bull Street  
Columbia, SC 29201-1708

## MEMORANDUM

TO: Leon Fulmer, Engineering Associate  
Corrective Action Engineering Section  
Division of Hazardous Waste Management  
Bureau of Land and Waste Management

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

DATE: 1 March 2005

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

DRAFT Proposed Plan for Waste, Soil, and Sediment Remedial Action at  
Site 12 12/SWMU 10-Jericho Island Disposal Area  
(May 2004)

The Division of Hydrogeology has reviewed the above referenced document. This document, dated May 2004, was received by the Department on 1 July 2004. It provides a physical description of SWMU 10 that includes the known history this SWMU. It describes previous environmental investigations performed at this SWMU, presents multiple remedial alternatives, compares the applicability of each remedial alternative, and proposes waste removal and marsh restoration as the final remedy. This document was reviewed with respect to R. 61-71 of the South Carolina Well Standards, R.61-79 of the South Carolina Hazardous Waste Management Regulations (SCHWMR), and appropriate guidance documents.

The Division of Hydrogeology has the following comments:

- 1) Introduction: The text should be revised to include John Litton as the point of contact for comments.
- 2) Site Background and Characteristics: The location and status of the old water well on Jericho Island should be included in the text.

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