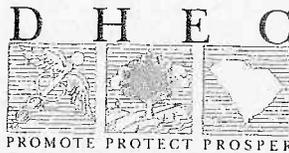


M00263.AR.000433  
MCRD PARRIS ISLAND  
5090.3a

LETTER AND MEMORANDUM REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND ENVIRONMENTAL CONTROL CONCURRENCE WITH DRAFT PASSIVE FLUX METER  
FIELD DEMONSTRATION PLAN FOR SITE 45 MCRD PARRIS ISLAND SC

9/6/2006

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

*Promoting and protecting the health of the public and the environment.*

September 6, 2006

U.S. EPA Region 4  
Attn: Lila Koroma-Llamas  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, GA 30303

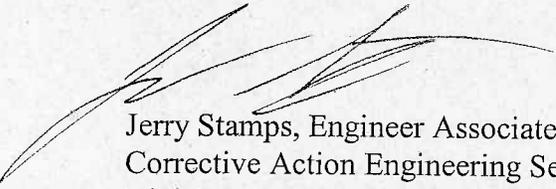
RE: Concurrence  
Draft Passive Flux Meter Field Demonstration Plan  
SWMU 45  
Marine Corp Recruit Depot  
Parris Island  
SC6 170 022 762

Dear Mrs. Llamas:

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 via email on August 21, 2006. The Department does not object to the implementation of this demonstration plan at SWMU 45; however, the Department anticipates that the results of this plan will be shared with the MCRD Tier I Team. Additionally, the EPA must coordinate with the Department's underground injection program to obtain the appropriate permit, if required.

If you have any questions or concerns, please feel free to contact me at (803) 896-4285.

Sincerely,



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

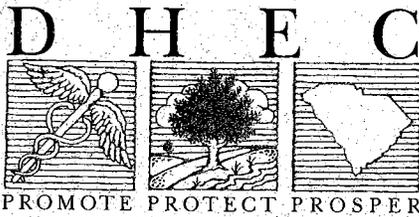
Attachment:

Memorandum from Don Hargrove to Jerry Stamps dated September 6, 2006

cc:

Tim Harrington, MCRD Parris Island  
Don Hargrove, Hydrogeology  
Priscilla Wendt, SCDNR  
Russell Berry, EQC Region 8, Beaufort

Art Sanford, SOUTHDIV  
Tom Dillon, NOAA  
Mark Sladic, TtNUS



2600 Bull Street  
Columbia, SC 29201-1708

## MEMORANDUM

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

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

DATE: 6 September 2006

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

DRAFT Passive Flux Meter Field Demonstration Plan  
Revision 1  
(August 2006)

The Division of Hydrogeology has reviewed the above referenced document. This work plan (dated 21 August 2006) was received by the Department electronically on 21 August 2006. This work plan describes the history of SWMU-45; it discusses the results of previous environmental investigations/remedial actions at SWMU-45. This document presents the scope of work proposed, to demonstrate the effectiveness of using a passive flux meter to obtain additional information concerning the current condition of the groundwater at SWMU-45, including contaminant concentrations and hydrogeological setting at SWMU-45.

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.

Based on this review, the Division of Hydrogeology has the following comment:  
Figure 11 of this document shows the results from previous investigations at SWMU-45. This figure lists the analytical results for wells previously sampled. The results shown for PAI-45-MW08-SU

indicate a vinyl chloride (VC) concentration of 220J. The "J" qualifier indicates that the reporting limit used by the lab for this sample was 220 µg/L. The MCL for VC is 2 µg/L. It is inappropriate to use reporting limits that exceed the MCL for a given constituent. It is understood that labs must sometimes use higher dilutions, and that the reporting limits must also be raised to compensate for said dilutions. However, when higher reporting limits are used, the facility must discuss the reasons behind the elevated reporting limits, and show how/why the result can still be deemed reasonably accurate and therefore useable. In the absence of this discussion, the Division of Hydrogeology can only determine that a positive detection exists, but cannot be quantified, and as such, will not make any final determinations using this potentially erroneous data.

Since this comment pertains to data previously generated, this comment does not require revision to this work plan, but it should be taken into consideration when discussing laboratory requirements, and data validation, as well as during generation of the resulting report.

Since the Division of Hydrogeology does not have any comments that would require revision, it is therefore recommended that this document can be approved and implemented as written.

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