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MCRD PARRIS ISLAND
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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON INTRUSIVE ACTIVITY
REQUEST/NOTIFICATION OF INTRUSIVE ACTIVITIES AT SITE 3 MCRD PARRIS ISLAND
SC
8/3/2007
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

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

August 3, 2007

Commanding Officer
NAVFAC Southeast
ATTN: Mr. Art Sanford
2155 Eagle Drive
North Charleston, South Carolina 29406

RE: Site/SWMU 3 Causeway Landfill: Intrusive Activity Request
Notification of Site/SWMU 3 Causeway Landfill Intrusive Activities
Land Use Control Standard Operating Procedure
Marine Corp Recruit Depot
Parris Island
SC6 170 022 762

Dear Mr. Sanford:

The Corrective Action Engineering Section of the South Carolina Department of Health and Environmental Control (Department) has completed the review of the above referenced documents, which were received June 1, 2007. Based on this review, the Department has comments. Please refer to the attached engineering comments.

If you have any questions or concerns, please feel free to contact me at (803) 896-4218.

Sincerely,

Meredith Amick, Environmental Engineer Associate
Corrective Action Engineering Section
Division of Waste Management

cc:

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

Lila Llamas, EPA Region 4
Tom Dillon, NOAA
Mark Sladic, TtNUS

ENGINEERING COMMENTS
Prepared by Meredith Amick
Marine Corps Recruit Depot (MCRD)
August 3, 2007

General Comments

1. The Notification of Site/SWMU 3 Causeway Intrusive Activities dated May 25, 2007 details the third LUC violation at the site. In a letter dated July 18, 2005 Colonel J.R. Wingard reports "two incidences of unauthorized activities occurring at Site/SWMU 3 Causeway Landfill." Colonel Wingard also writes that MCRD Parris Island "must buttress our internal procedures in order to make the land use controls effective and consequently ensure the effectiveness of the remedy." Due to the most recent violation of Land Use Controls at SWMU 3, the Department is very concerned and in the future more caution should be taken. As stated by Jerry Stamps in an August 2, 2005 letter commenting on the two previous LUC violations at SWMU 3, "Please be aware that future violations of LUCs may subject the MCRD to enforcement action." It appears that the procedures in place for preventing LUC violations are still not adequate due to the most recent event. Please explain additional measures that will be taken in the future to prevent such violations.

2. The Department does agree that completing the fiber optic conduit (allowing the open ended trench to be closed) will prevent future landfill intrusion and is therefore the best course of action. However, as listed in the Site Conditions and Contingencies, please note that construction personnel should be in Level D PPE at all times and continuous air monitoring should be used to determine whether PPE upgrades are needed.

Specific Comments

1. SWMU 3 Site Conditions and Contingencies-Investigation Results

Please detail Constituents of Concern in groundwater and surface water.

2. SWMU 3 Site Conditions and Contingencies-Investigation Results

The range of acceptable Incremental Lifetime Cancer Risk is listed as 1E-06 to 4E-04. The correct range should be 1E-06 to 1E-04.

3. Land Use Control Standard Operating Procedure-Regulations

Please add the FFA to the regulations that apply to MCRDPI's Ground Penetrating Activity Permit Program.

4. Land Use Control Standard Operating Procedure-Project Originators

In light of the three LUC violations at SWMU 3, a longer notification period would be appropriate. The Department suggests a 60 day notification period.

5. Land Use Control Standard Operating Procedure-MCRDPI IRP Manager

In light of the three LUC violations at SWMU 3, the Department recommends the IRP Project Manager provide EPA and DHEC a 30 day notification prior to Ground Penetrating Activity.

6. Land Use Control Standard Operating Procedure-Approval Process

Please explain if this LUCSOP is applicable to all sites with LUCs or only SWMU 3. Additionally provide justification for contacting the Safety Office only if the ground penetrating activity reaches 4 ft.

7. Land Use Control Standard Operating Procedure-Conducting Ground Penetrating Activities

Any waste generated from a SWMU/AOC should be reported as well as disposal manifests provided.

8. Land Use Control Standard Operating Procedure-IRP Manager Instruction Sheet

See Specific Comment #5.

9. Land Use Control Standard Operating Procedure-Non-IRP Contractor Waste Management Checklists

The page before the Water Management Reference Sheet reads, "Coverage of the construction project under the General Permit is ONLY required if the site is under a Record of Decision (ROD) or if there is an expected discharge off-Depot." However, the second paragraph of the Water Management Reference Sheet reads, "This fact sheet applies both to IRP sites with and to IRP sites with an approved decision document (for example, a Record of Decision [ROD] or and Action Memorandum) and to IRP sites without a decision." Please correct the discrepancy.

10. Land Use Control Standard Operating Procedure-Water Management Reference Sheet

Please provide rationale for labeling water as Non-Hazardous.

11. Land Use Control Standard Operating Procedure-Soil Management Reference Sheet

Please detail how the decision is made for location of disposal of contaminated soil.

12. Land Use Control Standard Operating Procedure-Soil Management Reference Sheet

Please provide rationale for labeling soil as Non-Hazardous.