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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 SOLID WASTE MANAGEMENT UNIT
ASSESSMENT REPORT FOR SITE 54 MCRD PARRIS ISLAND SC

10/2/2007

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

October 2, 2007

Commanding Officer
NAVFAC Southeast
ATTN: Mr. Charles Cook
PO Box 30
Ajax Street North, Bldg 135
Jacksonville, Florida 32212

RE: SWMU Assessment Report (SAR) for SWMU 54
Marine Corp Recruit Depot
Parris Island
SC6 170 022 762

Dear Mr. Sanford:

The Corrective Action Engineering Section and Division of Hydrogeology of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the above referenced document. Based on this review, the Department believes that the site should be further investigated. Therefore the following comments should be addressed once the site moves to the Confirmatory Sampling stage. Please refer to the attached engineering and risk assessment 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
Joe Bowers, Hydrogeology
Priscilla Wendt, SCDNR
Russell Berry, EQC Region 8, Beaufort

Lila Llamas, EPA Region 4
Tom Dillon, NOAA
Mark Sladic, TtNUS
Heber Pittman, MCRD Parris Island

MEMORANDUM

TO: Meredith Amick, Engineering Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Joe B. Bowers, P.G., Manager
Federal Facilities Groundwater Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: October 2, 2007

RE: Marine Corps Recruit Depot (MCRD)
SC6 170 022 762

SWMU Assessment Report (SAR) Addendum – Old Waste Water
Treatment Plant, SWMU 54, received August 2006

The above referenced report has been reviewed with respect to the requirements of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4. SWMU 54 – Old Waste Water Treatment Plant was discovered in January 2002 when construction equipment broke through the top of what turned out to be a 75,000 gallon tank. The concrete top of the tank was believed, prior to the construction equipment breaking through, a concrete pad from a demolished building. After it was realized that it was a tank, the MCRD declared it to be a SWMU and assigned it number 54.

SWMU 54 was a concrete tank 39.5 feet by 37.4 feet by 8 feet in depth with a total volume of approximately 75,000 gallons. It consisted of three chambers. A discharge pipe extended into the adjacent marsh. According to the SWMU Assessment Report (SAR), waste oil drums were found in the north chamber of the unit. This unit was apparently taken out of service sometimes in the 1940s. Some of the facilities that are believe to have discharged to SWMU 54 include a dry cleaner and a photo lab, among others.

Two comments have been generated from review of the SAR, as noted below.

1. The timeline for discovery and investigation at SWMU 54 appears to be out of order to the Department. It is noted in the SAR that SWMU 54 was discovered by the MCRD in January 2002. Then, according to the Department's records, the SWMU Assessment Report (SAR) was submitted in August 2006. In between discovery of this SWMU in January 2002 and August 2006, an Interim Measures Work Plan that included work to assess SWMU 54 was submitted in December 2004, and revised and resubmitted in March 2005. Also in March 2005, a report of the IM for SWMU 54 was submitted to the Department.

Based on the Department's records, the sequence of events from discovery to initial assessment of SWMU 54 has been out of order. The Department requests that MCRD clarify the sequence of events and the work performed to date at SWMU 54 to ensure that the Department's records are complete.

2. The SAR recommends further investigation of this SWMU to determine if there has been a release to the environment and if so, the extent and magnitude of such a release. The Department is aware that SWMU 54 was investigated as described in the Interim Remedial Actions for Various Sites – SWMU 3, SWMU 35, SWMU 53 and SWMU 54 Report, dated March 21, 2005. The Department's review of this report will be conducted under separate cover.

Based on the fact that this unit requires further investigation, this reviewer does not have any comments on the SAR at this time.

Should you have any questions, you may contact me at (803) 896-4024 or via email at bowersjb@dhec.sc.gov.

cc: Bureau File 50492