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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 REMEDIAL INVESTIGATION DATA AND
PHASE 2 WORK PLAN FOR SITE 27 MCRD PARRIS ISLAND SC

5/12/2008

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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May 12, 2008

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

RE: Site 27 Remedial Investigation Data and Phase II Work Plan
Marine Corp Recruit Depot
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Corrective Action Engineering Section and the Division of Hydrogeology of the South Carolina Department of Health and Environmental Control (Department) have completed the review of the Site 27 Remedial Investigation Data and Phase II Work Plan received March 24, 2008. Based on this review, the Department has comments. Please refer to the attached engineering and hydrogeology 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
Sommer Barker, 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

ENGINEERING COMMENTS
Prepared by Meredith Amick *MA*
Marine Corps Recruit Depot (MCRD)
April 18, 2008

Specific Comments

1. Proposed soil locations should be labeled on the map. Additionally the location of all SWMUs within the area should be included on all maps.
2. Please discuss the depth of the proposed soil samples and the relation to the depth of the groundwater contamination.
3. Please discuss the constituents for which the groundwater and soil samples will be analyzed.
4. On Figure 3-1 Surface Soil, Subsurface Soil, and runoff to Surface Water should also be evaluated for exposure routes.
5. Please provide soil data obtained from the Phase I RI WP.



C. Earl Hunter, Commissioner

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

MEMORANDUM

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

FROM: J. Sommer Barker, Hydrogeologist *JSB*
Federal Facilities Groundwater Section
Division of Hydrogeology
Bureau of Land and Waste Management

DATE: May 12, 2008

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of the Site 27 Remedial Investigation Data and Phase II Work Plan, dated March 24, 2008

The above referenced document has been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005. This document was sent by the Marine Corps Recruit Depot (MCRD) as a Phase II Remedial Investigation (RI) work plan to the Site 27 Remedial Investigation Work Plan (see Sladic to Sanford, 9/19/07).

The Department has generated the following comments as a result of the review of the revised RI Work Plan. MCRD should respond to these comments within 60 days of receiving this memo.

Comments

Table 3 Proposed Sampling – Site 27

1. The Phase I RI work plan indicates monitoring well MW-06 was sampled during the July 2002 field screening and monitoring well installation event. Free product was observed at this monitoring well. However, the Phase II RI work plan recommends sampling MW-06 for pesticides only. The Navy

should continue monitoring for free product during the Phase II RI monitoring event.

Figure 2 - VOC Concentrations (µg/L) In Groundwater

2. The Legend states that the symbol 'H' is defined as "Reported Concentration Exceeds The Region 9 Tap Water PRG". Figure 2 shows chlorobenzene detections at monitoring well PI055MW12I are listed with an H next to its detection; however, chlorobenzene has a maximum contamination level (MCL) of 0.1 mg/L. It is unclear as to why these constituents are being screened against preliminary remediation goal (PRG) instead of their known MCLs. MCRD should clarify this and respond to this comment.

Table 3 Proposed Sampling – Site 27 Page 2 of 3

3. Monitoring well installation is suggested (ex. PAI-27MW51S) proposed in sampling plan table. However, monitoring well approval cannot be written based on the specifications proposed in this work plan. More information should be provided, either within this workplan, or in a separate monitoring well approval request. In addition to the information provided in this work plan, the following information is also required (R.61-71.H.1.a):
 - a) Proposed well locations on a scaled map or plot
 - b) Proposed well construction details
 - c) Well owner's name and mailing address
 - d) Property owner's name and mailing address (if different from the well owner)
 - e) Proposed parameters to be analyzed
 - f) Proposed drilling date

Should you have any questions regarding this review, you may contact me at (803) 896-6647 or by email at barkerjs@dhec.sc.gov.