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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 RANGE ENVIRONMENTAL VULNERABILITY  
ASSESSMENT MCRD PARRIS ISLAND SC

11/25/2008

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

November 25, 2008

Commanding General  
MCRD  
Attn: Tim Harrington  
P O Box 5028  
Parris Island, SC 29905-0028

RE: Range Environmental Vulnerability Assessment  
Marine Corp Recruit Depot (MCRD)  
Parris Island  
SC6 170 022 762

Dear Mr. Harrington:

The Corrective Action Engineering Section of the South Carolina Department of Health and Environmental Control (Department) has completed the review of the Range Environmental Vulnerability Assessment (REVA) received October 27, 2008. The Department appreciates MCRD providing us the opportunity to review the document. The Department would also appreciate the opportunity to review any subsequent assessments and/or best management practices applied to the ranges. Please be aware if any of these operational ranges are deemed other than operational, they will be subject to RCRA and will need to be included in the FFA. Based on the review of the REVA, 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:

Charles Cook, NAVFAC Southeast  
Sommer Barker, Hydrogeology  
Priscilla Wendt, SCDNR  
Russell Berry, EQC Region 8, Beaufort

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

ENGINEERING COMMENTS  
Prepared by Meredith Amick  
Marine Corps Recruit Depot (MCRD)  
November 25, 2008

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**General Comments**

1. The Department does not have record of receiving or reviewing the ATSDR report from 1996. If MCRD has a documented response from the Department, please provide this in order for the Department to update their file.
2. The Department reviewed the Qualitative Assessment Sections for each range and understands this discussion relates to the operational ranges at MCRD. Once the operational range(s) is deemed other than operational the area will be subject to RCRA and will need to be investigated including historical uses. Please clarify if in the interim the MC constituents in wetlands and water bodies near the operational ranges, the soil chemistry effect on deposition of lead, and animal uptake will be quantitatively assessed.
3. In the future maps showing the extent of the operational ranges and historic ranges within those areas would be helpful. This will help in identifying whether any of the historical ranges discussed lie outside of the operational range area. If any discussed in this document lie outside of operational range area, please list their MRP designation in either the REVA or future MRP document.
4. Please clarify the fate of the lead mined out of berms on operational ranges.
5. The ranges assessed with the Small Arms Range Assessments all fall within the Moderate Environmental Concern Evaluation Ranking. The recommended action for Moderate Environmental Concern Evaluation Ranking includes Implementing BMPs and Considering sampling appropriate media (groundwater, surface water, and/or soil). Please clarify if any BMPs have been implemented and if additional sampling is being considered. Due to the impact to the marsh, if either of these have been done or will be done in the future the Department would appreciate having the opportunity to review.

**Specific Comments**

6. Section 4.5

This section states that seven MRP sites have been identified; however, during the October 2008 Partnering meeting eight MRP sites were discussed. Please clarify.

7. Section 4.5

Please clarify how the Aerial Bombing Target at Page Field does not contain REVA indicator MC.

8. Section 6-10

Please clarify if it is common practice to allow recreational use of an operational range.

9. Section 6.1.8

This section discusses flares used on the Inchon Range; however, lead is the only MC constituent qualitatively assessed. Please clarify if any other MC constituents should be assessed due to the use of flares on the range.