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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 SAMPLING AND ANALYSIS PLAN FOR SITE
27 EQUIPMENT PARADE DECK MCRD PARRIS ISLAND SC
8/24/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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August 24, 2010

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

RE: Comments to the Sampling and Analysis Plan for Site 27
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the *Sampling and Analysis Plan for Site 27* received June 2, 2010. Based on this review the Department provides the following comments. The Department's comments are based on the information presented by MCRD to date; any information found to be contradictory may result in additional comments or require further action. If you have any questions regarding this issue, please contact me at (803) 896-4218

As stated in numerous partnering meetings and conference calls, the Department is not preventing the Navy/Marines from moving forward with the planned construction at the Motor T Facility. Please note the attached comments are not intended to delay the process. The Department will continue to support the Navy/Marines with meeting their construction schedule.

Sincerely,

Meredith Amick, P.E., Environmental Engineer
Corrective Action Engineering Section
Division of Waste Management

cc:

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

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

ENGINEERING COMMENTS
Prepared by Meredith Amick
Marine Corps Recruit Depot (MCRD)
August 12, 2010

General Comments

1. As expressed previously, the Department believes that there is currently sufficient information to complete the RI Report at this site. However, the Navy elected to collect additional data as part of this field effort. To reiterate previous requests, the Department expects to see an RI Report after the data is collected in order to determine the most appropriate path forward for Site 27. Though not currently anticipated, please note that the Department will make a determination about the need for additional field work based on the results presented in the RI Report.
2. Because the work at this site has been completed and was performed at risk, the Department does not feel that it is a productive use of resources to revise the SAP. These comments may be addressed in the RI Report. However, if the Navy decides to revise the document, our comments must be addressed.
3. Figure 17-1 is not included in this report. In the RI Report please be sure to include a map of all locations that were sampled as part of the field effort for Site 27.
4. Please include all disposal manifests generated from the field effort related to this Site 27 SAP in the report following this work.

Specific Comments

1. Response to EPA Comment #14
In the RI Report, please provide disposal manifest (to include volume and location of disposition) for the LNAPL and water removed from the Fiber Optic Vault in 2001 and 2003.
2. Response to Kent Krieg's Specific Comment #1, and in Worksheet 11
The Department believes that there are very few analytes whose MDLs cannot reach their screening values. If this is the case for any analytes being screened, a discussion should be provided in the RI Report.
3. Section 11.2 #4, SAP Worksheet #17 Soil Sampling and Groundwater Sampling
In the Response to Comments section and Worksheet #14 of this report PAHs were included in the parameter list for analysis; however, Worksheets #11 and #17 do not mention PAHs. In the RI Report, please be clear as to which samples were screened for what parameters.
4. Worksheet #15

The definitions and use of the terms LOQ, LOD, PAL, and PQLG are unclear. On the table provided in the report following this work the following criteria are needed: analyte, MDL, actual detection value (or ND if appropriate), and ALL appropriate screening values for the specific media being addressed.

5. Worksheet #36

Although not included in other worksheets, this worksheet states that soil and groundwater samples will be analyzed for DRO and GRO. Because all samples are already being analyzed for VOCs and SVOCs and there is no screening criterion for DRO and GRO, the Department does not believe that DRO and GRO samples are necessary.

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MEMORANDUM

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

FROM: Kent Krieg, Risk Assessor
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: August 24, 2010

RE: Marine Corps Recruit Depot
Parris Island, South Carolina

Document:
Draft Sampling and Analysis Plan
Site 55 – Fiber Optic Vault, Site 9 – Paint Waste Storage Area
Site 16 – Pesticide Rinsate Disposal Area
Characterization Sampling

Dated June 2010

The above referenced documents by Tetra Tech NUS, Inc. have been reviewed. The Department has the following risk related comments:

Specific Comments:

1. Figure 10-5 is not consistent with the receptors and pathways listed in 10.3.3 Human Health Receptors and Exposure Pathways on page 30 of 114. Please update the figure.
2. Discussion about the ecological receptors is listed within 10.3.3 Human Health Receptors and Exposure Pathways on page 30 of 114. The Department recommends that another section be created (i.e. 10.3.4 Ecological Receptors and Exposure Pathways) to incorporate this ecological discussion.

If you need any further information, feel free to contact me at (803) 896-4262.



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: Annie M. Gerry, Hydrogeologist *Annie M. Gerry*
Federal Facilities Groundwater Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: August 9, 2010

RE: Marine Corps Recruit Depot
SC6 170 022 762

Review of Draft- Sampling and Analysis Plan for Site 55-Fiber Optic Vault (FOV), Site 9- Paint Waste Storage Area, and Site 16-Pesticide Rinsate Disposal Area, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated June 2010

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. Light Non-Aqueous Phase Liquid (LNAPL) was discovered floating on groundwater during installation of the FOV. Site 55 is located just east of Site 27, Motor T Area and based on prior investigations, groundwater flows from the FOV toward the Motor-T Area. Site 9 (former Paint Waste Storage Area) and Site 16 (Pesticide Rinsate Disposal Area) are located to the northeast of Site 55. The purpose of this document is to delineate the extent of contamination of Sites 55, 9, and 16 so a Non-Time Critical Removal Action can be performed.

Based on review of this document, the following comments have been generated.

Comments

1. The field work proposed in this document has already been conducted by the MCRD. The MCRD choose to proceed with field work 'at risk' in an effort to expedite assessment. Since a report of this field work has not been submitted to the Department for review, the Department does not have any comments based on the scope of work performed at Site 55/9/16. SCDHEC will make its decision regarding whether to request additional assessment to define the nature and extent of contamination after reviewing the next Site 55/9/16 report.

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2. The Departments original comment #5

On *Table 17-1-Proposed Groundwater Samples*, VOCs, PCBs, pesticides, and MNA parameters are not included in the Proposed List of Analytes. Please add these parameters to the analyte list to obtain a complete picture of groundwater quality at Site 27.

MCRD Response: Groundwater samples will be analyzed for TCL VOCs, SVOCs, PAHs, pesticides, PCBs, and TAL metals. The Navy believes this would adequately characterize the groundwater at Site 27 and Site 55. . The SAP will be modified accordingly. The Navy agrees that additional sampling is required to meet Team expectations

Department Response: Page 31, Bullet Number 3 reads, "Field investigation parameters: Water table level, groundwater dissolved oxygen, conductivity, pH, temperature, turbidity, and oxidation-reduction potential." These are some of the MNA parameters, but in the MCRD response, MNA parameters are not listed in the Proposed List of Analytes. Since field work has already been completed at this site, for future reference, please collect the complete list of MNA parameters when collecting groundwater samples from this point on.

Should you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 896-4018.