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MCRD PARRIS ISLAND
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U S NAVY RESPONSES TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON SAMPLING AND ANALYSIS PLAN FOR SITE
55, SITE 9 AND SITE 16 MCRD PARRIS ISLAND SC
11/1/2010
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST

Meredith Amick, P.E., Environmental Engineer

General Comments

1. **Comment:** 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.

Response: Comment noted.

2. **Comment:** 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.

Response: Comment noted. Since the SAP has been revised to address USEPA comments SCDHEC comments will also be addressed.

3. **Comment:** Please include all disposal manifests generated from the field effort related to this Site 27 SAP in the report following this work.

Response: Disposal manifests will be included in the Appendix of the RI Report.

4. **Comment:** Please discuss the location of the underground storage tank (used to collect paint waste, paint stripper, and waste oil) mentioned in the third paragraph of the Executive Summary. Please discuss whether this UST is still in place.

Response: There was not a UST at Site 9 or 16. The UST described in the Executive Summary is off-site. The wastes were collected in drums at Sites 9 and 16 and then transported to an off-site waste facility where the waste was transferred into a UST.

Specific Comments

1. **Comment:** Response to EPA Comment #11
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.

Response: Addressed in comment 3 above. The disposal manifest will be included in the Appendix of the RI Report.

2. **Comment:** 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.

Response: A discussion of any analytes whose LOQ and LODs cannot reach the Project Action Limits will be included in the RI Report.

3. **Comment:** 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.

Response: PAHs are included in the final version of the SAP.

4. **Comment:** 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.

Response: Comment noted. The definition of LOQ, LOD, PAL, and PQLG are provided in the acronyms section of the SAP. The use of the LOQ, LOD, and PAL are described in the footnotes of Worksheet 15. MDL is also listed in Worksheet 15 as the DL and is provided for completeness. The RI Report will include a reporting of the analyte, MDL, actual detection value (or ND if appropriate), and all appropriate screening values for the specific media being addressed.

5. **Comment:** 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.

Response: DRO and GRO were inadvertently included in several worksheets and will be deleted in the final SAP. DRO and GRO will not be analyzed because full suite SVOCs and VOCs are being analyzed.

Kent Krieg, Risk Assessor

Specific Comments:

1. **Comment:** 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 120. Please update the figure.

Response: Figure 10-5 will be updated and the SAP has been revised so the various risk scenarios are reported consistently.

2. **Comment:** Discussion about the ecological receptors is listed within 10.3.3 Human Health Receptors and Exposure Pathways. The Department recommends that another section be created (i.e. 10.3.4 Ecological Receptors and Exposure Pathways) to incorporate this ecological discussion.

Response: Worksheet 10 Section 10.3.3 has been revised with a revised title to include Ecological Risk Assessment. A statement was added to ensure that if contaminated groundwater is found to have reached the marsh area and may be surfacing or discharging to surface waters/sediments, an eco risk assessment may be necessary.

Annie M. Gerry, Hydrogeologist

Comments

1. **Comment:** 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 27. SCDHEC will make its decision regarding whether to request additional assessment to define the nature and extent of contamination after reviewing the next Site 27 report.

Response: Comment noted.

2. **Comment:** 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 32, 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.

Response: MNA parameter sampling requirements will be addressed in the next scoping/DQO meeting.