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MCRD PARRIS ISLAND  
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON THE LIMITED REMEDIAL INVESTIGATION  
WORK PLAN FOR SITE 35 MCRD PARRIS ISLAND SC  
6/4/2013  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



Catherine B. Templeton, Director

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

June 4, 2013

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

and

Commanding General  
NREAO  
ATTN: Mr. Tim Harrington  
PO Box 5028  
Parris Island, SC 29905

RE: Comments to Limited RI Work Plan for Site 35  
Marine Corp Recruit Depot (MCRD)  
Parris Island  
SC6 170 022 762

Dear Mr. Owens and Mr. Harrington:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the above report received May 7, 2013. The Department reviewed the document with respect to applicable sections of the South Carolina Hazardous Waste Management Regulations (SCHWMR). Based on this review the Department has the following comments.

The Department's review is based on the information presented by MCRD to date; any information found to be contradictory may require further action. If you have any questions regarding this issue, please contact me at (803) 898-0368.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Amick". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

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

cc:

Lila Llamas, EPA Region 4  
Annie Gerry, Hydrogeology  
Priscilla Wendt, SCDNR

Russell Berry, EQC Region 8, Beaufort  
Peggy Churchill, TiNUS  
Dave Warren, Resolution Consultants

Engineering Memo  
Prepared by Meredith Amick  
Marine Corp Recruit Depot (MCRD)  
May 31, 2013

1. Please note when the current Hazardous Materials Storage Area that is in the vicinity of Site 35 is closed this area will need to be reinvestigated as a RCRA site.
2. This site is located on Horse Island. Please discuss and provide on a figure its proximity to disposal areas (including where concrete from Site 8A and 8B was disposed).
3. Please discuss and provide a location on a figure the proximity of Site 53 to Site 35.
4. Please note the Parris Island Partnering Team has agreed to use the MCAS Background (2x mean, although presenting 95% UCL as well) for screening both soil and sediment. Additionally the Non Process Area Outfall data set from the Site 14 SI Report can be used to screen sediment as well.
5. Please respond to the Department's June 25, 2004 comments and state where and how they are addressed in the document. The Department does not believe that comment #5 is addressed.
6. The Department references sample PI-035-03 in comment #1 of the June 25, 2004 comments; however, it does not appear that this sample is present on Figure 10-9.
7. Please present one figure that is an overlay of both historical samples and proposed samples.
8. Figure 3-1 and Figure 10-10  
Please clarify why groundwater is considered only an offsite release.  
Additionally residential receptors should be shown on this figure.
9. Section 10.4  
Please clarify the use and contents of the two ASTs discussed. Specifically discuss whether they are still in service and/or if they have been previously investigated.



Catherine B. Templeton, Director

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**MEMORANDUM**

**TO:** Meredith Amick, P.E.  
Department of Defense (DoD) Corrective Action Section  
Division of Waste Management  
Bureau of Land and Waste Management

**FROM:** Annie M. Gerry, Hydrogeologist   
Department of Defense (DoD) Corrective Action Section  
Division of Waste Management  
Bureau of Land and Waste Management

**DATE:** June 5, 2013

**RE:** Marine Corps Recruit Depot  
SC6 170 022 762

Review of **Draft-Limited Remedial Investigation/RCRA Facility Investigation Work Plan for Site 35, DRMO Salvage Yard**, Marine Corp Recruit Depot (MCRD), Parris Island, South Carolina, dated May 2013

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. Site 35 is situated in an industrial setting and is currently being used as storage area for various materials and is a 90 day Resource Conservation and Recovery Act (RCRA) storage unit for petroleum products hazardous materials. The purpose of this document is to investigate to determine if contamination is present, to assess potential threats to human health and the environment and to fill any data gaps.

Based on review of the document, the following comment has been generated.

On Page 4-1, Section 4.0 Project Planning- Decision Rule 2, the text states, "*If groundwater contains constituents at concentrations below PALs or poses no unacceptable risk, then no further action is required.*" Since this site is currently being used as an active collection/storage area and a 90 day RCRA storage unit for hazardous materials and petroleum products, groundwater will need to be reevaluated and the site reinvestigated in the event that Site 35 closes (See Amick Comment #1).

Should you have any questions regarding this memo, please contact me via email at [GerryAM@dhec.sc.gov](mailto:GerryAM@dhec.sc.gov) or by phone at (803) 898-0359.