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MCRD PARRIS ISLAND  
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MEMORANDUM REGARDING NATIONAL OCEANIC AND ATMOSPHERIC  
ADMINISTRATION COMMENTS ON APPENDIX B OF MASTER WORK PLAN VOLUME 3 OF  
3 MCRD PARRIS ISLAND SC  
12/17/1997  
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

16.01.00.0003



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL OCEAN SERVICE**  
**OFFICE OF OCEAN RESOURCES CONSERVATION AND ASSESSMENT**  
**HAZARDOUS MATERIALS RESPONSE AND ASSESSMENT DIVISION**  
**COASTAL RESOURCES COORDINATION BRANCH**  
c/o U.S. Environmental Protection Agency, Region 4  
Waste Management Division  
61 Forsyth Street, Atlanta, GA 30303

**MEMORANDUM**

**TO:** Distribution  
**FROM:** Tom Dillon, Ph.D.   
**SUBJECT:** NOAA CRC Review of Master Work Plan - Parris Island MCRP  
**DATE:** 17 Dec 97

The U.S. Department of Commerce/National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to review and comment on **Appendix B, Volume III, Master Work Plan, Marine Corps Recruit Depot, Parris Island, South Carolina**. If you have any questions contact me at (404) 562-8639, FAX 404-562-8662 or tom.dillon@hazmat.noaa.gov.

**Major Comments and Recommendations:**

1. **Follow, as closely as possible, EPA's 1997 guidance for conducting Ecological Risk Assessments at Superfund sites.** The Master Work Plan (MWP) currently cites an outdated (1994) version of EPA's ecorisk guidance. Figure B-1 in the MWP should mimic Exhibits I-2 and I-3 of EPA (1997) unless there are compelling reasons not to do so. These reasons should be discussed in Appendix B of the MWP.
2. **Comparison to screening values should occur in Step 2 only.** The MWP currently screens media concentrations in Step 1 and ingested doses in Step 2. Both screens should occur in Step 2 as per EPA 1997.
3. **Step 1 should require site visit(s) and habitat characterization.** As currently written, the MWP does not require a site visit until step 5. This is too late in the process. Step 1 should include a site visit as well as a description of the environmental setting. The latter need not be exhaustive but should indicate the size and types of habitats, potential receptors, chemical release mechanism(s) as well as a rudimentary pathways analysis.
4. **Post-screening uncertainty is reduced by collecting site-specific information, not by changing elements of the risk screen.** Portions of Appendix B suggest that if the risk screen shows unacceptable risk, the process will be altered by changing the underlying assumptions and data inputs to make the results less uncertain. The appropriate way to reduce post-screening uncertainty is by collecting site-specific information. This is the guidance contained in EPA 1997, espoused by EPA Region 4 and recommended by NOAA.



## Other Comments

(page, paragraph, line):

- B-1, 2, 8 Add "natural resource trustees" to list of partners.
- B-1, 3, 10 "wells" should be "values"?
- B-1, 4, 3 Sentence "When such ..." is unclear. All screening values should be the chronic NOAEL. This value can be estimated by dividing a chronic LOAEL by 10. If no chronic values are available, a chronic NOAEL can be estimated by dividing an appropriate acute LOAEL by 100.
- B-4, 3 Delete last sentence. All screening should be conducted in Step 2.
- B-6, 1 The term "bioaccumulate" is used inappropriately.
- B-13, 2 See EPA 1997 for what constitutes an acceptable assessment endpoint.
- B-16 Consult with EPA Region 4 to see if an sediment ER-L is still an acceptable substitute for a food-chain-based screening value.
- B-17, 5, 3 Substitute "assessment endpoint" for "resources to be protected".
- Table B-3 Define the column headings "Screening Value" and "Effects Value".
- Table B-5 Provide reference for source of Dutch soil screening values.

## Distribution:

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Tim Harrington, Parris Island MCRD  
Kenneth Lapierre, EPA Region 4  
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