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MCRD PARRIS ISLAND
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MEMORANDUM REGARDING NATIONAL OCEANIC AND ATMOSPHERIC
ADMINISTRATION COMMENTS ON FEASIBILITY STUDY/CORRECTIVE MEASURES
STUDY REPORT FOR SITE 1 INCINERATOR LANDFILL MCRD PARRIS ISLAND SC
8/13/2001
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF RESPONSE & RESTORATION
COASTAL PROTECTION AND RESTORATION DIVISION
C/o U.S. Environmental Protection Agency, Region 4
Waste Management Division
61 Forsyth Street, Atlanta, GA 30303

MEMORANDUM

TO: Parris Island Partnering Team

FROM: Tom Dillon, Ph.D.

SUBJECT: NOAA Comments Site 1 FS Report

DATE: August 13, 2001

The U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on Feasibility Study/Corrective Measures Study for Site/SWMU 1 – Incinerator Landfill, Marine Corps Recruit Depot, Parris Island, South Carolina, submitted by Tetra Tech NUS, Pittsburgh to Southern Division, NAVFAC, Charleston. If you have any questions, please contact me at 404-562-8639, FAX 404-562-8662 or tom.dillon@noaa.gov.

1. The subject document presents four remedial alternatives.
 - a. Alternative 1 - No action
 - b. Alternative 2a – Removal of sediments that exceed ecological RGOs for pesticides and inorganics to an on-site cap. Sediments exceeding ecological and human health RGOs for PAH would be monitored for natural attenuation.
 - c. Alternative 2b - Removal and placement under an on-site cap of all sediments exceeding ecological and human health RGOs for pesticides, inorganics and PAH.
 - d. Alternative 3 - Removal and off-site disposal of sediments exceeding ecological and human health RGOs for pesticides, inorganics and PAH.

NOAA concurs with recommendations by the South Carolina Department of Health and Environmental Control as well as the South Carolina Department of Natural Resources. That is, the most appropriate remedial solution for Site 1 is a modified Alternative 2a.

The modification includes the removal of PAH-contaminated sediments in a small ($\approx 1/2$ acre) area west of the upland portion of Site 1 (see Figure 3-2).

The report's proposal to monitor natural attenuation of PAH-contaminated sediments was not accompanied by any modelling that established the nature and duration of expected attenuation of petroleum compounds to ecological and human health RGOs.

2. The proposed cap/enclosure remedial solution should be designed and constructed to eliminate migration of contaminants to adjacent surface waters or sediments either by erosion or by the discharge of ground water. To that end, long-term monitoring and a contingency plan should be part of the selected remedy for Site 1. It is premature to specify the exact timing and frequency of monitoring.

3. NOAA concurs with comments by South Carolina personnel that areas impacted by sediment excavation should be actively restored to functioning saltmarsh habitat. NOAA is anxious to work with other members of the Parris Island MCRD Partnering Team to identify innovative, cost-effective remedial solutions that minimize chemical risks and enhance habitat restoration.