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MCRD PARRIS ISLAND
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EMAIL OF TRANSMITTAL AND MEMORANDUM REGARDING NATIONAL OCEANIC AND
ATMOSPHERIC ADMINISTRATION COMMENTS ON DRAFT RECORD OF DECISION FOR
SITE 1 INCINERATOR LANDFILL AND SITE 41 FORMER INCINERATOR MCRD PARRIS
ISLAND SC
9/25/2002
U S FISH AND WILDLIFE SERVICE

Sladic, Mark

From: Diane_Duncan@fws.gov
Sent: Wednesday, September 25, 2002 3:16 PM
To: Tom Dillon
Cc: Dennis Ewing; David Keefer; Gary Benfield; Don Hargrove; Tim Harrington; Rob Pope; Debra Kraemer; Art Sanford; Sladic, Mark; Priscilla Wendt
Subject: Re: NOAA Comments on Parris Island Site 1 Draft ROD



020918
CRCcmt-ROD.DOC

The U. S. Fish and Wildlife Service concurs in the comments and recommendations made by NOAA regarding the Parris Island Site 1 Draft ROD.

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09/20/2002 09:16 AM
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cc:
Subject: NOAA Comments on Parris Island Site 1 Draft ROD

see attached subject comments

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(See attached file: 020918 CRCcmt-ROD.DOC)



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
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61 Forsyth Street, Atlanta, GA 30303

MEMORANDUM

TO: Parris Island Partnering Team

FROM: Tom Dillon, Ph.D.

SUBJECT: NOAA Comments on Draft ROD for Site 1 Parris Island MCRD

DATE: September 18, 2002

CC: Reed Armstrong, South Carolina Coastal Conservation League

The U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on Draft Record of Decision Site/SWMU 1 and SWMU 41, Marine Corps Recruit Depot, Parris Island, South Carolina, submitted to Southern Division NAVFAC by Tetra Tech NUS, Inc., Pittsburgh, May 2002. If you have any questions, please contact me at 404-562-8639, FAX 404-562-8662 or tom.dillon@noaa.gov.

1. Contaminated material should be placed under the cap out of tidal influence.
The cap design will allow tidal exchange with material under the cap periphery. Therefore, contaminated material (i.e., soils and excavated sediments) should be placed well away from the influence of the large diurnal (twice a day) tides that occur in the Beaufort area. This action will greatly reduce the post-construction risk of hazardous substances discharging to the saltmarsh. Recommend the following sentence be inserted in the descriptions of the Selected Remedy (§1.4 and §2.10), "Contaminated material (i.e., soils and excavated sediments) will be located away from the cap periphery and tidal influence."

2. A more fundamental description of anticipated monitoring should be provided.

a. Monitoring is mentioned several times as an important element of the selected remedy. However, the nature of the monitoring is not described in this ROD even in a

rudimentary fashion. The type and frequency of monitoring selected will be critical to evaluating remedy effectiveness. As Reed Armstrong of the South Carolina Coastal Conservation League adroitly notes, "post-project monitoring must be focused on assuring success of the containment system, through addressing (1) "trigger" criteria that could be used to identify system failure, and (2) contingency actions to be taken in the event of such failure." (Appendix B – Responsiveness Summary). In this reviewer's opinion, the Navy's response to this portion Mr. Armstrong's comment was inadequate. It basically refers the commenter to Appendix A -The Land Use Control Implementation Plan (LUCIP). The *only* monitoring described in the LUCIP is quarterly visual observations by base personnel. Sediment, groundwater and re-vegetation monitoring are not mentioned.

b. NOAA recommends the following text be added to the descriptions of the Selected Remedy in §1.4 and §2.10. At the end of the "Saltmarsh Restoration and Monitoring" paragraph, revise to read, " and then monitored quarterly for the first year and annually thereafter to quantitatively determine re-vegetation success. The saltmarsh monitoring plan developed during remedial design will include performance standards for re-vegetation success as well as contingencies a non-successful outcome." In the Land Use Controls and Long-Term Monitoring paragraph, insert the following sentence, "The monitoring program will include annual sampling to establish temporal trends, performance standards for success as well as contingencies for a non-successful outcome."

3. More precise and consistent projections of affected wetlands should be provided.

a. In comparing the remedial alternatives, the ROD states that 2 to 5 acres of wetlands would be affected but then returned to natural conditions under Alternatives 2a, Modified 2a, 2b or 3 (§2.8.4, page 2-23). These area estimates are less precise (one significant figure) and appear inconsistent with projections provided earlier; i.e., 1.5, 1.8, 3.1 acres created/restored under Alternatives 2a, Modified 2a or 2b, respectively; 11.4 acres created/restored under Alternatives 3 (§2.8.4, page 2-22).

b. Because Modified 2a is the Selected Remedy, more precise (two significant figures) estimates of wetlands affected, restored and created now appear possible. These should be provided in the descriptions of the Selected Remedy in §1.4 and §2.10 as well as a single figure.

4. Other Comments

a. §1.1 indicates Site 1 is approximately 7 acres. The ROD's description of the Selected Remedy has two estimates for cap size; 5.0 acres (§1.4) and 6.3 acres (§2.10). These estimates should be consistent or explain why they are different. Also, in the

description of the Selected Remedy, explain why the cap size is smaller than the 7 acre site.

b. §1.3 Assessment of the Site – Please clarify whether aquatic or terrestrial risks are being discussed in the ERA results. Consider organizing this discussion around the ERA's assessment endpoints as per EPA guidance.

c. §2.4 ¶3 indicates ground water has been "slightly affected" but then only refers to human health. Ground water discharge to surface water and impacts to aquatic biota are ignored in this section. Please refer to prior NOAA comments (October 10, 2000) on the RI (excerpted below) which indicate the ground water to surface water pathway is likely viable at Site 1. Revise the ROD accordingly.

"More fully evaluate the ground water to surface water exposure pathway. Ground water is very shallow at this site (2'-3' BGS). It is likely that ground water is discharging at the surface water/sediment interface. This line of speculation is supported by elevated surface water/sediment concentrations that are spatially related to some elevated ground water analytes (e.g., see mercury and copper). The fate and transport section of this RI report should more fully explore this pathway." (from NOAA 10/10/00 comments).

d. The text in §2.5.4, ¶4 seems to suggest that impacts to fish are minimal because "areas near the site are limited to small schooling species" and larger fish only occasionally use the area. Humanistic qualifications and descriptions should be omitted from the text of the ROD. It could equally be argued that the site's shallow water habitats provide important refugia for small fish and invertebrates during most of the tidal cycle and valuable foraging areas for larger fish during high tides. This description of Site 1 intertidal habitat value is probably more accurate than the minimalist picture painted in the current text.

e. Delete the phrase "most stringent" that appears over and over again in the Nature and Extent of Contamination section (§2.6). The repeated use of this phrase strongly implies ecological screening values are uniformly ultraconservative and unrealistic. They are not. Rather, they are environmentally protective *threshold* values. That is, environmental concentrations below screening values are likely protective with a high degree of certainty while those above are uncertain. This is why EPA guidance recommends site-specific testing when threshold screening values are exceeded. Recently, at several sites in EPA Region 4, site-specific testing generated ecologically protective levels that approximate EPA's screening values. Therefore, these values are not uniformly ultraconservative and unrealistic.

f. The last sentence in §2.6, ¶6 is misleading. It says copper, lead, mercury, zinc and naphthalene were present in ground water at concentrations that "could" exceed the

"most stringent" ecological screening values if attenuation factors (sic dilution) were not present. Delete this sentence or revise text in light of comments 5.c. and 5. e. above.

g. §2.7.2 Ecological Risk Assessment

¶2 – Text fails to note a major aquatic receptor; the estuarine benthic community. Please add this receptor group.

¶4 – Revise the second sentence to read, "... indicate that unacceptable risks may exist to the estuarine benthic community."

Table – Specific chemicals are missing for each HQ reported. Add chemicals and retitle the middle column to indicate these are HQs based on *maximum* concentrations detected.

h. Delete the fourth bullet in §2.8.1 or provide the technical basis for assuming sediment RGOs based on benthic toxicity are protective of higher trophic level receptors. If this were true, we would rarely do any food web modelling to assess chemical risks.

i. Please include natural resource trustee comments on the ROD and Proposed Plan in the Responsiveness Summary (Appendix B). Trustees have a statutory fiduciary responsibility to husband nature resources for the public good. It is appropriate, therefore, to include their written input in the section of the ROD devoted to public comments.