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MCRD PARRIS ISLAND  
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EMAIL REGARDING U S NAVY COMMENTS ON STATE REQUIREMENTS AND  
STANDARDS BEING USED AS APPLICABLE, RELEVANT AND APPROPRIATE  
REQUIREMENTS FOR FEASIBILITY STUDY FOR SITE 45 MCRD PARRIS ISLAND SC  
5/7/2008  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST

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**Subject:** RE: State requirements and standards being used as ARARs 45  
**Date:** Wednesday, May 07, 2008 12:01:02 PM

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Yes , Just showing an example of State standards not always being ARARs. The point is we need to establish a lot before the fs is finished. I think we are looking at FS WITHOUT HAVING FULLY CONCURRED ON REQUIREMENTS. As an agenda item I would like a concurrence on the requirements for this site to be a goal of the next meeting .  
V/R  
Charles Cook

-----Original Message-----

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Subject: Re: State requirements and standards being used as ARARs 45

I am confused.....

Are you asking if the dw stds for COCs at Site 45 are secondary non-mandatory non-health related cosmetic standards, either federally or at the state?

There are federal MCLs for TCE set at 5 ppb in dw, which is also the trigger level for vapor intrusion concerns, below which there should be no unacceptable risk. I am sure the state has similar levels. There are similar federal dw MCLs for PCE and PCE daughter products other than just TCE, each also having trigger levels for vapor intrusion concerns. These are NOT Secondary MCLs (SMCLs - non-health related standards), and therefore, I fail to see the connection to Site 45, other than references to regulations that REQUIRE we protect human health and the environment, address unacceptable risks, and clean up to regulatory health based standards which meet the ARAR requirements.

Now, if you want to get at drivers for the Site 45 FS, via Risk and ARAR discussions, it appears we need to have that discussion. Just off the top of my mind issues to be discussed include but are not limited to: 1) risk calculations for gw regarding various pathways and exposure points = typical - drinking, etc. as well as vapor intrusion, 2) risk for soil sources, if they exists (including both soils at the source zones, as well as sediments at the deposition areas), 3) data regarding potability (salinity and TDS), 4) Federal and State Standards for potability, 5) State classification regulations, 6) anthropogenic influence on potability, 7) data regarding current status of deep aquifer, 8) data regarding confining layers, 9) principal threat source material to shallow and/or deep aquifers, 10) future use (dw and development), 11) data for current vapor intrusion concerns, 12) potential for future

vapor intrusion concerns. That's just for starters..... : - )

Thanks,  
Lila

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05/07/2008 09:14 AM

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Subject  
State requirements and standards  
being used as ARARs 45

Team,  
This EPA correspondence seems to be related to our issue with ground  
water(site 45),ARARs; State requirements at Parris Island. FYI

v/r  
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(See attached file: e6n03400.pdf)