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MCRD PARRIS ISLAND  
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U S NAVY RESPONSES TO U S EPA REGION IV COMMENTS ON TECHNICAL  
MEMORANDUM POST-INTERIM CONSTRUCTION RISK ASSESSMENT FOR SITE 3  
CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC  
9/10/2010  
NAVAL FACILITIES ENGINEERING COMMAND SOUTHEAST

RESPONSE TO EPA REGION 4 COMMENTS

For the Marine Corps Recruit Depot (MCRD)  
Parris Island, South Carolina  
Site/SWMU 3

Technical Memorandum Post-Interim  
Construction Risk Assessment - July 2010.

1. **Comment:** Section 4.3, Page 27. Please explain here and in Table 11 if the results are dry weight or wet weight for ease of comparison to literature or other data sets.

**Response:** The results for the fish tissue samples are on a wet weight basis. This will be added to the text on Page 27 and to Table 11.

2. **Comment:** Section 5.1, Page 30. In the first paragraph on Page 30:

- Change “CERCLA established fish ingestion rates” to “other fish ingestion rates” or clarify this statement.
- In the last sentence of the paragraph (beginning “Subsequent discussions...”), “CERCLA receptors” should be changed to “the selected exposure scenarios.”

**Response:** The text has been modified as requested.

3. **Comment:** Section 5.1, Page 33. In the last paragraph prior to Section 5.2, the text mentions analysis of fish tissue included DDE and DDT in addition to DDD “and dioxin-like PCBs at the request of U.S. EPA.” This should be revised to state that analysis included DDD, DDE, and DDT “at the request of U.S. EPA and NOAA, and PCBs at the request of SCDHEC based on recommendations of ATSDR. In order to address SCDHEC's request for PCB analysis, EPA's guidance required the analysis of PCB congeners. This allowed for appropriate detection limits and for comparison against screening levels for fish tissue.” Also, correct this if similar text occurs elsewhere in the document. Otherwise, remove all references to specific Agencies and simply describe what was done and for what purpose.

**Response:** References to specific Agencies have been removed from the aforementioned text.

4. **Comment:** Section 5.3, Page 34. The text mentions fish tissue concentrations as being wet weight. Please indicate so on Table 13, if this is the case.

**Response:** Table 13 will be revised to indicate the fish tissue results are on a wet-weight basis.

5. **Comment:** Section 5.4.1, Page 35. The text references Tables 14, 14A and 14B. However there is little information regarding Table 14. Table 14 includes “Total PCBs (non-dioxin

like” and “Total PCBs (dioxin like).” These terms are contradictory to the analysis obtained. The table includes a non-dioxin like Total PCB exposure point concentration. This appears to be an error. Analyses were not performed for the non-dioxin like PCB congeners (p. 46). Also, since non-dioxin like PCBs were not analyzed for, “Total” PCBs cannot be addressed. It appears 14A and 14B represent what was analyzed and calculated. Delete Table 14 and remove references to it.

**Response:** Table 14 and all references to it have been deleted as requested.

- Comment:** Section 5.6.3, Page 40. At the end of the first paragraph a reference is made to Tables “18A and 18B”. However, there is no reference to “Table 18”. Table 18 is located just before Tables 18A and 18B. Table 18 does not include sufficient information to differentiate it from the other tables, yet it presents results which are in conflict with 18A and/or 18B. It appears Tables 18A and 18B represent results in accordance with EPA guidance. Delete Table 18 and any references to it, if there are any.

Furthermore, the non-cancer results for child subsistence fisher (19) and adult subsistence fisher (8) from the RAGS tables in Appendix H differ from those in Table 18A (17 and 7 respectively). Please reconcile the differences.

**Response:** Table 18 has been deleted as requested. The values in Appendix H are the correct values. Table 18A, Figure 12, and the text will be revised to present the values shown in Appendix H.

- Comment:** Section 5.7, Page 43, last paragraph. Delete the last sentence in the paragraph regarding “typical” CERCLA evaluations. CERCLA evaluations are site-specific.

**Response:** The sentence has been deleted as requested.

- Comment:** Section 5.8, Page 47, First Bullet at the bottom. This bullet discusses the comparison of the results of the risk characterization of Site 3 .vs. the reference pond. The text in this bullet seems to overstate the similarities of the comparisons as compared to the discussion in Section 5.6.3, which states, the “statistical analyses...show mixed results when considering whether or not Site 3 dioxin-like PCB concentrations are statistically greater than those detected in the reference area.” Please use this statement of uncertainty in the summary bullet in Section 5.8.

**Response:** The statement mentioned above in Section 5.6.3 has been used to replace the first bullet in the list of items to be considered when evaluating the results of the risk assessment at the end of Section 5.8, as requested.

- Comment:** Section 7.1, Page 64, next to last sentence before 7.2. Replace “at the request of EPA” with “in accordance with EPA guidance.”

**Response:** The text has been modified as requested.

10. **Comment:** Section 7.2.1, Page 65, second paragraph. The first sentence states the risks “are comparable”. This description is too vague. To better reflect the comparisons between the two, the sentence should be reworded to “... are comparable to, but exceed, those from the reference location.” In the second sentence, delete “and statistical comparisons”. In the same sentence, Mercury is omitted from the list of primary risk drivers. Add mercury and describe its comparison by factors. Then add a new last sentence that states, “However, a statistical analysis of the two data sets showed mixed results when considering whether or not Site 3 dioxin-like PCB concentrations are statistically greater than those detected in the reference area.”

**Response:** The text has been modified as requested.