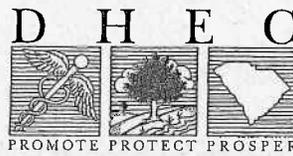


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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL COMMENTS ON PROPOSED PLAN FOR SITE 3 MCRD
PARRIS ISLAND SC
9/10/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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September 10, 2010

Commanding Officer
NAVFAC Southeast
ATTN: Mr. Charles Cook, P.E.
PO Box 30
Ajax Street North, Bldg 135
Jacksonville, Florida 32212

RE: Review of the Site 3 Proposed Plan
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the *Site 3 Causeway Proposed Plan* received August 26, 2010. The Department reviewed the document with respect to applicable sections of the South Carolina Hazardous Waste Management Regulations (SCHWMR). Based on this review the Department provides the following comments. Please see attached hydrogeology and risk assessment comments.

The Department's comments are based on the information presented by MCRD to date; any information found to be contradictory may require further action. If you have any questions regarding this issue, please contact me at (803) 896-4218.

Sincerely,

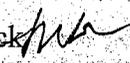
Meredith Amick, P.E., Environmental Engineer
Corrective Action Engineering Section
Division of Waste Management

cc:

Tim Harrington, MCRD Parris Island
Annie Gerry, Hydrogeology
Priscilla Wendt, SCDNR
Russell Berry, EQC Region 8, Beaufort

Lila Llamas, EPA Region 4
Tom Dillon, NOAA (via email)
Mark Sladic, P.E., TtNUS
Heber Pittman, MCRD Parris Island

Engineering Comments

Prepared by Meredith Amick 

Marine Corp Recruit Depot (MCRD)

September 1, 2010

General Comments

1. Based on the August 31, 2010 conference call, the Department understands there will be new proposed language issued for the signs on the fishing pier submitted by September 10. The Department understands that the language will be discussed at the September 14-15, 2010 Partnering Meeting.
2. The Department commented to the Site 3 Proposed Plan December 11, 2007. Please provide response to comments.
3. The Department's concerns as documented in comments to the Site 3 Tech Memo SAP and Site 3 Tech Memo are still applicable.
4. Please note the following comment has been made to the Site 3 Causeway Landfill Sinkholes letter: Per the Department's August 3, 2007 letter (Amick to Sanford), methods ensuring that Land Use Controls were implemented and followed properly were to be carried out at Site 3. It is apparent from this letter that both the lack of the stability of the landfill and communication of Land Use Controls at Site 3 are still an issue. The implementation of Land Use Controls (LUCs) as described in the upcoming LUC RD for Site 3, should clearly state how the Depot has corrected these problems and anticipates compliance with the LUCs in the future (i.e. the leaking culvert must be corrected, proof of communication of LUCs must be provided, etc.).
5. As stated in the Five Year Review, "quarterly LUC inspections are occurring at Site 3." Based on this statement in the Five Year Review as well as the recent LUC implementation issues (subsidence of the landfill as well as material removed from the landfill without Department notification) at Site 3, the Department expects the quarterly monitoring requirement to be included to the ROD and LUC RD for Site 3.
6. Please note because Site 3 is to be inspected quarterly, the Department should be receiving the LUC Inspection Reports quarterly.
7. Please note that the FFA is a three party agreement in which the SCDHEC and EPA have equal stake. Multiple places in this document list EPA as the lead support agency or state Navy and EPA, in conjunction with SCDHEC, etc. All such references should be corrected.
8. The Department agrees with the following comment from page 11:

"Although unacceptable risks to the aforementioned receptors was identified, because exposure point concentrations for the dioxin-like PCBs (the primary risk drivers) did not exceed reference area concentrations by more than a factor of 2, the Navy considers it reasonable to conclude that contamination identified in fish at both the reference location and the 3rd Battalion Pond is anthropogenic background rather than that resulting from any Site 3 related releases (s)."

Therefore, the Department believes that the 4th bullet under the LUC Objectives should read, "To provide notice to individuals fishing from the 3rd Battalion Pond regarding fish limitations." Please revise the document.

9. There was no unacceptable human exposure identified for swimming and wading at Site 3 and there is no LUC Objective listed in the Proposed Plan to prohibit swimming or wading; therefore, under Engineering Controls on page 14, signs prohibiting swimming and wading should not be listed.

Specific Comments

1. Introduction Second Paragraph

Please make the correction that the Proposed Plan was developed by the Navy/Marines, instead of the MCRD Parris Island Partnering Team.

2. Last Paragraph Page 3

To be clearer, the sentence should read, "The HHRA indicated that potential risks exist to adult subsistence, child subsistence, and child recreational fisherman."

3. LUC Objectives Page 11

Please bullet out, "To prohibit the extraction or any use of the groundwater beneath the site."

4. Pg 12

The last bullet heading on page 14 should read, "CONTINUATION/MODIFICATION of Land Use Controls from the Interim Record of Decision."

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Promoting and protecting the health of the public and the environment.

MEMORANDUM

TO: Meredith Amick, Environmental Engineering Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Kent Krieg, Risk Assessors
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: September 7, 2010

RE: Marine Corps Recruit Depot
Parris Island, South Carolina

Documents:
Technical Memorandum Post-Interim Construction Risk Assessment
Sites: SWMU 3 – Causeway Landfill
Dated May 2010

Site/SWMU 3 Proposed Plan
Dated August 2010

The above referenced documents by Tetra Tech NUS, Inc. and Department of the Navy have been reviewed. The Department has the following risk related comments:

General Comments for both documents:

1. The Department has previously issued suggestions on ways to better convey these non-site related risks. As stated in prior comments to the Technical Memorandum and past team discussions, the Department still believes that the data concludes the elevated risk is not site related.
2. Because the Department does not agree that the risk is elevated due to contamination from Site 3, we do not concur with the need for posting any fish restriction signage. If the Navy feels that fishing restrictions are in their best interests, the Department suggests one of the following:
 - a) The removal of the fishing piers to limit access to fishing and, therefore, consumption of fish from the 3rd Battalion Pond.
 - b) The Navy designates the 3rd Battalion Pond as 'Catch and Release Only' to remove the human receptors from eating the fish from the 3rd Battalion Pond.

- c) The Navy proposes new changes to the sign language. As stated during the August 31, 2010 Partnering Team conference call, the language of the sign will be discussed further at the September 2010 Tier I/II Partnering Team Meeting.

Specific Tech. Memo Comments:

1. The Department believes that similar language used in the last paragraph of the *Proposed Plan* on page 9 should have been included in the *Tech. Memo's Results of the Risk Characterization* (5.6.3 - page 40), the *Summary* (5.8 - page 46), and *Human Health Risk Assessment* (7.2.1 - page 64). Although a document revision is not requested, this additional language would help clarify the Navy's position on the effect of anthropogenic background to the site as well as to bring consistency between the two documents.

Specific Proposed Plan Comments:

1. Final Remedy Proposal Summary, No Action for Sediment, page 2 and Post-IRA Sediment Risk Conclusions, page 8: Prior to the post-IRA risk assessment, uncertainty analysis, and risk communication discussions, the ecological risks were above EPA's point of departure of a HI=1. The Department recommends that the bullet point's wording be changed to something similar to that of 'No Action for Ground Water' and 'No Action for Surface Water,' including discussion of how the sediment concentration (and therefore the risk) of the COC's post-IRA decreased. Stating there is no unacceptable human health or ecological risks may seem misleading to the public since the site's elevated potential risks fell within the EPA's risk management range and were found to be acceptable. It could be also confusing since sediment was the primary proposed pathway for the contamination of fish from the site.

If you need any further information, feel free to contact me at (803) 896-4262.



C. Earl Hunter, Commissioner

Promoting and protecting the health of the public and the environment.

MEMORANDUM

TO: Meredith Amick, Engineering Associate
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

FROM: Annie Gerry, Hydrogeologist *Annie Gerry*
Federal Facilities Groundwater Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: September 9, 2010

RE: Marine Corps Recruit Depot,
SC6 170 022 762

Review of Proposed Plan for Final Remedy at Site 3/SWMU 3, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina dated August 2010

The above referenced document has been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005. Site 3 is a former landfill located in the northwestern portion of MCRD Parris Island which now serves as a causeway connecting Horse Island to Parris Island. From the 1960s until 1972, the causeway was gradually constructed using layers of solid waste, fill dirt, and other debris. This Proposed Plan highlights key information from investigations performed at Site 3. The components of the final remedy include a landfill cover system, land use controls (LUCs), monitoring of landfill leachate and risk communication outreach instituted by MCRD personnel to communicate potential risks of fish consumption from the adjacent pond located at Site 3.

Based on review of this document, no comments were generated.

Should you have any questions regarding this memo, please contact me via email at GerryAM@dhec.sc.gov or by phone at (803) 896-4018.

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