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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT FINAL PROPOSED  
PLAN FOR SITE 3 CAUSEWAY LANDFILL WITH ATTACHMENT MCRD PARRIS ISLAND SC  
11/10/2010  
U S EPA REGION IV



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4**

**Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960**

November 10, 2010

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

4SD-FFB

Naval Air Station, JAX  
Navy Facilities Engineering SE  
Installation Restoration, SC IPT  
Attn: Charles Cook  
PO Box 30  
North Ajax Street, Bldg 135  
Jacksonville, FL 32212-0030

**SUBJECT: EPA Review of the Draft Final Site/SWMU 3 Proposed Plan for the Causeway Landfill, Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina (September 2010) in support of a Final ROD for the Site.**

Dear Mr. Cook:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Draft Final Proposed Plan for Site 3 – Causeway Landfill (Proposed Plan). This Proposed Plan is being developed in support of a Final Record of Decision for the Site. The document has been reviewed in accordance with EPA's *Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents* (July 1999). EPA's review has found that previous comments have been addressed. However, this final review has identified a deficiency related to demonstrating the proposed final remedy was evaluated against National Contingency Plan (NCP) criteria for remedial alternatives and that the final remedy continues to satisfy the threshold criteria. [Reference 40 CFR 300.430(e)(9)(iii) and 430(f)(1)(i) and (ii).] EPA's Guidance instructs the preparer to include a statement explaining the rationale for recommending the Preferred Alternative over other alternatives based on comparison to the nine criteria analysis. The Draft Final Proposed Plan does not include such a comparison or statement. Therefore, EPA is hereby issuing a conditional approval of this Draft Final document to require insertion of the necessary information in accordance with EPA guidance and the NCP.

In order for this Proposed Plan to be considered approved by EPA as final, the following conditions must be met satisfactorily:

**CONDITIONS:**

1. **Summary of Remedial Alternatives Evaluated in the Feasibility Study in Support of the Interim ROD** – Add a section that briefly describes the original remedial alternatives considered for the interim remedy in the FS, all of which were containment with waste left-in-place or no action (See 2000 PP pages 6 and 7). Briefly clarify that the Navy did not undertake another FS for development of the final remedy since the FFA parties agreed that the interim remedy should be adopted as a final remedy. Also, include a description of the NCP alternatives analysis requirement that was performed in the FS (See 2000 PP page 8, first full paragraph). EPA suggests insertion of a text box briefly explaining the nine criteria so that the reader can reference it, and which allows the Navy to more easily summarize information required in the Condition below (see attached text box for an example). The 2000 Proposed Plan, developed in support of the Interim Record of Decision, included summary paragraphs with the above information (see parenthetical references above). EPA suggests the Navy use similar language in this Proposed Plan, however make sure to use past tense to indicate this was done in the past and has been completed.
2. **Preferred Final Remedy Section** – This section of the Proposed Plan should be revised to address the requirement to include a statement explaining the rationale for recommending the Preferred Alternative over other alternatives based on the nine criteria analysis (See 2000 PP Page 7, Section on why the alternative was recommended in 2000). Although the interim remedy is being adopted as final, the Proposed Plan should reiterate that the preferred alternative was compared to the nine criteria when selected as the interim remedy, and provide a summary of how the final remedy meets the criteria (See 2000 PP, Pages 8 and 9, comparison of alternatives to NCP Criteria). Then the Navy should affirm that the interim remedy adopted as final continues to satisfy the threshold criteria as required by CERCLA Section 121 and the NCP. EPA suggests the Navy reference the 2000 Proposed Plan on this issue and use similar language in this Proposed Plan, however, make sure to use past tense to indicate the comparison was done in the past, has been completed, but is still valid today.

This concludes EPA's conditions for approval. If there is any way EPA can assist in helping the Navy to develop appropriate language to address the deficiency, please do not hesitate to call. I can be reached at (404) 562-9969.

Sincerely,



Lila Llamas  
Senior RPM  
Federal Facilities Branch  
Superfund Division

cc: Lisa Donohoe, MCRD  
Meredith Amick, SCDHEC  
Mark Sladic, TtNus

## What are the Nine Evaluation Criteria?

**Threshold Criteria** (The selected remedy must satisfy these criteria):

**Overall Protectiveness of Human Health and the Environment** determines whether an alternative eliminates, reduces, or controls threats to public health and the environment.

**Compliance with ARARs** evaluates whether the alternative meets federal and state environmental statutes, regulations, and other requirements that pertain to the site, or whether a waiver is justified.

**Balancing Criteria** (These criteria are used to weigh the relative merits of the alternatives):

**Long-Term Effectiveness and Permanence** considers the ability of an alternative to maintain protection of human health and the environment over time.

**Reduction of Toxicity, Mobility, or Volume of Contaminants through Treatment** evaluates an alternative's use of treatment to reduce the harmful effects of principal contaminants, their ability to move in the environment, and the amount of contamination present.

**Short-Term Effectiveness** considers the length of time needed to implement an alternative and the risk the alternative poses to workers, residents, and the environment during implementation.

**Implementability** considers the technical and administrative feasibility of implementing the alternative, including factors such as the relative availability of goods and services.

**Cost** includes estimated capital and annual operation and maintenance costs, as well as present worth cost. Present worth cost is the total cost of an alternative over time in terms of today's dollar value. Cost estimates are expected to be accurate within a range of +50 to -30 percent.

**Modifying Criteria** (These criteria are also considered during remedy selection and incorporated into the ROD):

**State/Support Agency Acceptance** considers whether the state agrees with the Navy's analyses and recommendations, as detailed in the RI, FS, and Proposed Plan.

**Community Acceptance** considers whether the local community agrees with the Navy's analyses and Preferred Alternative. Comments received on the Proposed Plan are an important indicator of community acceptance.