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MCRD PARRIS ISLAND
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND
ENVIRONMENTAL CONTROL CONDITIONAL CONCURRENCE WITH PROPOSED PLAN
DRAFT 2 AND TECHNICAL MEMORANDUM FOR SITE 3 WITH ATTACHMENT MCRD
PARRIS ISLAND SC
11/15/2010
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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Promoting and protecting the health of the public and the environment

November 15, 2010

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

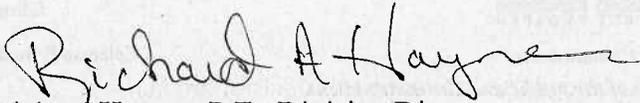
RE: Conditional Concurrence of the Site 3 Proposed Plan D2 and Technical Memorandum
Marine Corp Recruit Depot (MCRD)
Parris Island
SC6 170 022 762

Dear Mr. Cook:

The Department has reviewed and concurs with all parts of the Proposed Plan D2 and Tech Memo both received September 30, 2010 for Site 3 located at the Marine Corp Recruit Depot in Parris Island, S.C. except for the conditions as listed in the attachment to this letter. If the implementation of the remedy as selected by the future ROD in accordance with this Proposed Plan does not achieve the Remedial Goal selected by the Department, a separate action may be taken to achieve the remedial goal. In concurring with this Proposed Plan, the South Carolina Department of Health and Environment Control (SCDHEC) does not waive any right or authority it may have under federal or state law. SCDHEC reserves any right or authority it may have to require corrective action in accordance with the South Carolina Pollution Control Act. These rights include, but are not limited to, the right to insure that all necessary permits are obtained, all clean-up goals and criteria are met, and to take separate action in the event clean-up goals and criteria are not met. Nothing in the concurrence shall preclude SCDHEC from exercising any administrative, legal and equitable remedies available to require additional response actions in the event that: (1)(a) previously unknown or undetected conditions arise at the site, or (b) SCDHEC receives additional information not previously available concerning the premises upon which SCDHEC relied in concurring with the selected alternative; and (2) the implementation of the remedial alternative selected in the ROD is no longer protective of public health and the environment.

Please note if any changes are made to either of the September 30, 2010 versions of the Tech Memo or Proposed Plan D2, the Department reserves the right to conduct another review, at which time the conditional concurrence may be withdrawn. If you have any questions regarding this issue, please contact Meredith Amick at (803) 896-4218.

Sincerely,



Richard Haynes, P.E., Division Director
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., TiNUS
Lisa Donohoe, MCRD Parris Island

List of Conditions

1. The Department has concerns with the methodology used to reach this decision on fish consumption at Site 3 and will not carry the rationale used at Site 3 to other sites on the base during Investigation and Remediation phases.
2. The Department does not concur that there is an elevated risk due to site related contamination at Site 3.
3. The Department does not concur with the risk management decision, including the use of one individual as the reasonable maximum exposure, used to reach the conclusion that fishing restriction is warranted.
4. It was never the Department's intent or understanding that fish tissue samples be taken for PCB congeners. The Department believed that fish tissue samples should be analyzed for Aroclor 1254. Previous data from the site was analyzed for Aroclor 1254 for both fish tissue and soil/sediment. The objective of the fish tissue sampling was to evaluate the trend in PCB concentrations post installation of the cover.
5. Because of reasons listed above, the Department does not agree with the LUC objective "To prevent ingestion of contaminants in fish tissue."
6. The Department concurred with the "No Subsistence Fishing" signage in the IROD, based on the understanding that signage was necessary to keep trespassers off of the rip-rap (part of the cover system in the interim remedy).
7. The Navy and MCRD should do a better job of preventing LUC failures at Site 3, as evidenced by the several issues (breach of cover, sinkholes, etc.) to date. This includes the LUC education program, Base Master Plan, and GIS, etc. These issues should be resolved in the LUC RD; however, as mentioned in the November 4, 2010 letter (Amick to Cook), "Because the formation of sinkholes is a continuing problem, the Department needs documentation that a permanent solution is being designed before we concur with the ROD."
8. The Department understands that "No swimming or wading" is a Land Use Control only to prevent "No unauthorized intrusive activities" to protect the integrity of the landfill cover.
9. If the Navy is electing to prohibit fishing from the Site 3 pond, the signage for requiring SC fishing license at the Site 3 pond should be removed.
10. The Department believes the following information is confusing to the public. Both the Proposed Plan and the Technical Memo state that fish are contaminated due to sediment and surface water influence at Site 3. No rationale or connection is made between the contaminants in fish and sediment/surface water media. No remedy is proposed for either sediment or surface water. As outlined above, the Department does not believe that the contaminants in fish require a remedy; therefore, we do not believe a remedy for sediment or surface water is necessary.