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LETTER REGARDING U S EPA REGION IV RESPONSE TO U S HOUSE OF  
REPRESENTATIVES LETTER REGARDING PROPOSAL TO PROHIBIT FISHING IN THIRD  
BATTALION POND AT SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC  
2/25/2011  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

February 25, 2011

The Honorable Joe Wilson  
Member, U.S. House of Representatives  
Lowcountry District Office  
P.O. Box 1538  
Beaufort, South Carolina 29901

Dear Congressman Wilson:

Thank you for your January 31, 2011, letter to Mr. Christopher Bliley, former Associate Administrator of the Office of Congressional and Intergovernmental Relations, on behalf of Mr. Robert Freeman and the members of the Parris Island Rod and Gun Club, concerning a proposal to prohibit fishing in the 3<sup>rd</sup> Battalion Pond located on the Marine Corps Recruit Depot (MCRD), Parris Island, South Carolina. Your letter was forwarded to my office for a response.

The U.S. Environmental Protection Agency (EPA) listed the MCRD on the National Priorities List on December 16, 1994. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) requires federal facilities to enter into a Federal Facilities Agreement (FFA), which lays out the framework and procedures for remedial investigations and cleanup under CERCLA. The FFA became effective on March 31, 2006. The Navy is the lead agency, and the EPA and South Carolina Department of Health and Environmental Control (SCDHEC) are support agencies under the MCRD FFA. At federal facilities, the Navy and EPA jointly select the remedies to be implemented at the site consistent with the National Contingency Plan (NCP) and EPA guidance, and then concurrence is sought from the State. It is under this FFA, and in compliance with CERCLA, that actions are being proposed to be taken at the Causeway Landfill adjacent to the 3<sup>rd</sup> Battalion Pond.

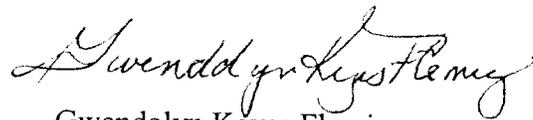
Prior to 1972, the Causeway Landfill (Site 3) received solid waste which reportedly included municipal trash with small amounts of potentially hazardous substances. After an extensive investigation, a determination was made by the FFA parties that an action was needed to remediate contaminated soils and sediments. In 2001, an interim remedial action was implemented that included soil covers, a protective lining, and land use controls (LUCs) including, but not limited to, prohibiting subsistence level fishing in the 3<sup>rd</sup> Battalion Pond. Studies performed during the initial investigation indicated that fish in the 3<sup>rd</sup> Battalion Pond were safe to eat occasionally, but not on a daily basis as would occur in a subsistence scenario. The restriction was posted at the pond and has remained in place to this day.

Currently, a final remedy is being considered for Site 3 which includes the adoption of the interim remedy as final along with a modification to the LUCs. New information has come to the attention of the FFA parties which indicates local fishers may be consuming fish from the 3<sup>rd</sup> Battalion Pond at rates higher than the typical recreational fisher. In order to determine if the fish are now safe to eat at a higher ingestion rate, fish tissue samples were taken and analyzed for contaminants. The evaluation was based on site-specific conservative assumptions and CERCLA Risk Assessment Guidance. The results are captured in a document entitled *Technical Memorandum Post-Interim Construction Risk Assessment for Site 3 - Causeway Landfill* (July 2010), located in the MCRD Administrative Record File in the information repository at the Beaufort County Public Library Headquarters. The risk assessment finds the contamination levels in fish could potentially result in unacceptable health risks for not only the subsistence fishers but also for children consuming at a recreational level. The main contaminants contributing to risk were mercury and polychlorinated biphenyls (PCBs). As a result of the potentially unacceptable risk, and as a part of the final remedy summarized in the Proposed Plan, the Navy is proposing a prohibition of fishing at the 3<sup>rd</sup> Battalion Pond as a conservative site-specific precautionary measure.

CERCLA and the NCP require a public comment period on Proposed Plans. The Site 3 Proposed Plan is in its final stages of development and a public meeting has been tentatively scheduled for March 15, 2011, on base at MCRD. A Public Notice for the Proposed Plan and public meeting should appear in upcoming issues of *The Boot* (MCRD newspaper) and in the *Beaufort Gazette*. We encourage any interested parties to attend the meeting. Remedial project managers, risk assessors, and environmental health specialists from the Navy, Marine Corps, EPA, and SCDHEC will be present to answer any additional questions your constituents may have regarding the remedy. Fact sheets and posters explaining more details about the site investigations, risk assessments, and proposed remedy will be available at that time as well. The meeting is an opportunity for the community to provide comments on the actions being proposed. If your constituents cannot attend, the Notice will also instruct them how to obtain a copy of the Proposed Plan and Fact Sheet, and when and where to submit written comments. Comments will be given full consideration and an official written response will be provided in the Record of Decision for all comments received.

If you have questions or need additional information from EPA, please contact me or the Region 4 Office of Congressional and Intergovernmental Relations at (404) 562-8327.

Sincerely,



Gwendolyn Keyes Fleming  
Regional Administrator