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MCRD PARRIS ISLAND  
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LETTER REGARDING SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON HUMAN HEALTH RISK RELATED TO  
CONSUMPTION OF FISH AND SHELLFISH FROM EXTENDED SITE INSPECTION AT SITE 3  
MCRD PARRIS ISLAND SC  
5/10/1993  
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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**RECEIVED**

MAY 12 1993

**HYDROGEOLOGY**

May 10, 1993

MEMORANDUM

TO: Joe Bowers  
Hydrogeology Division  
Bureau of Solid and Hazardous Waste Management

FROM: John F. Brown, DVM, PhD *John F. Brown*  
State Toxicologist  
Division of Health Hazard Evaluation

RE: Evaluation of Human Health Risk Related to Consumption  
of Fish and Shellfish taken from the vicinity of the  
Marine Corps Recruit Depot (MCRD) Causeway Landfill

1. I agree with 5.0 Conclusions section of the final draft of the submitted document that US FDA action levels for noted contaminants are not adequately protective for subsistence consumers of fish and shellfish from the site.
2. US FDA action levels are more appropriate for seasonal, occasional sports fishing use which more nearly simulates fish obtained through commercial food channels.
3. A risk-based assessment based on presented data would be highly conjectural without additional data on quantitative and qualitative consumption patterns of periodic and subsistence consumers of local fish and shellfish obtained from this site.
4. Before human health risk conclusions can be made, a more extensive data review, further statistical attributes of data evaluation and development of summary statistics must be made.

Conclusion: Established US FDA action levels on the contaminants reported in assayed fish from this site are reasonably protective for periodic consumers, such as sports and seasonal fishermen, in my opinion. However, subsistence consumers of fish and shellfish for long periods from this site are probably not adequately protected by these action levels. This situation could be addressed by public notification of such consumers that regular heavy consumption of fish and/or shellfish from this site for a long-term period may pose a significant health hazard.