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LAND USE CONTROL IMPLEMENTATION PLAN FOR SITE 3 CAUSEWAY LANDFILL MCRD
PARRIS ISLAND SC
9/1/2000
TETRA TECH NUS

**Land-Use Control Implementation Plan For Site 3
Marine Corps Recruit Depot
Parris Island, South Carolina**

This document identifies Land-Use Controls (LUCs) restricting Site 3, Causeway Landfill, at the Marine Corps Recruit Depot (MCRD) Parris Island, South Carolina. LUCs will be implemented for the purposes of (a) restricting human contact with solid waste material and surface soil, groundwater, surface water, and sediment contaminated with organic and inorganic constituents; (b) restricting human ingestion of fin fish and shellfish harvested from the pond adjacent to Site 3; (c) restricting soil disturbance activities (i.e., construction activities); and (d) prohibiting residential development of the site.

1. SITE DESCRIPTION

Site 3 is a primarily gravel, two-lane road overlying layers of solid waste, fill dirt, and debris deposited in a tidal marsh across Ribbon Creek as shown in Figure 2-2 of the main text. Site 3 functioned as the major disposal area for solid waste and other materials discarded in dumpsters around the MCRD during most of the period between 1960 and 1972. After implementation of an Interim Soil Remedy for Site 3, 2 feet of soil cover will be present over the waste and materials at the site, and the sides of the causeway will be stabilized to prevent migration of waste into the marsh and pond.

A human health risk assessment (HHRA) was conducted at Site 3 that evaluated risks to human receptor populations that may come in contact with site contaminants. The HHRA concluded that risk estimates for site construction workers and maintenance workers are considered to be acceptable by the U.S. EPA. Risk estimates to recreational users (fishermen) are not considered to be acceptable by the U.S. EPA under scenarios that assume daily fish consumption over a 30-year period and higher concentrations of contamination in the pond. Although not specifically addressed in the RI, Site 3 may also present potential effects to human receptors if the site were to be used for residential purposes. Consequently, the Depot, U.S. EPA Region 4 and the SCDHEC agreed that LUCs should be implemented at Site 3.

2. LOCATION

MCRD Parris Island (as shown in Figure 2-1 of the main text) is located along the southern coast of South Carolina, approximately 1 mile south of the city of Port Royal and 3 miles south of the city of Beaufort within Beaufort County. Site 3 is located in the northwestern portion of MCRD Parris Island and is an integral part of a causeway connecting Horse Island and Parris Island.

3. LAND-USE CONTROL OBJECTIVES

The Site 3 Proposed Plan for Soil Interim Remedial Action (TtNUS, 2000) calls for the initial implementation and continued application of appropriate restrictions on future usage of the property encompassing Site 3 while it is owned by the federal government. These restrictions will apply until/unless site remediation is conducted to restore the site for unrestricted use. Should the Navy later decide to transfer, by deed, ownership in the property encompassing Site 3 to any private person or entity, then the provisions of paragraph Deed Covenants and Conveyance of Title as set forth on page A-3 of this Land-Use Control Implementation Plan (LUCIP) shall apply. Until that time, the following LUCs addressed in the following section will remain in effect.

4. LUCS IMPLEMENTED TO ACHIEVE OBJECTIVES

Quarterly visual inspections and reviews will be conducted for the purposes of verifying that all necessary LUCs have been implemented and are being properly maintained. An annual report will be prepared and forwarded to U.S. EPA and SCDHEC signed by the Depot Commanding General (with copy to SOUTHNAVFACENCOM), certifying the continued retention of all implemented LUCs associated with Site 3.

Authorized Activities. The following activities are permissible within the confines of Site 3:

- Activities or uses that will not result in residential site development or otherwise allow for continuous, long-term exposure to children residing relatively close to the site (e.g., playgrounds).
- Recreational use of the site (e.g., fishing and jogging) that does not affect the integrity of the soil cover over the causeway.
- Unintrusive site maintenance activities (e.g., mowing) that do not affect the integrity of the soil cover over the causeway.
- Intrusive activities, as required, to maintain or replace existing monitoring wells. Required personnel protection equipment will be at least Level D unless conditions indicate otherwise.

Unauthorized Activities. Those activities and uses that are inconsistent with the objectives of this LUCIP and that, if implemented at Site 3, could pose an increased risk of harm to health, safety, public welfare, or the environment. The following activities will not be permitted within the confines of Site 3:

- Construction of facilities specifically intended for use as residential housing or child care.

- Intrusive construction activity without the use of Level D personal protection equipment (PPE) (e.g., long sleeve shirt, gloves, and Tyvek® coveralls and boot covers if the potential exists for soiling work attire). Also, intrusive construction activity without the use of continuous air monitoring to determine whether upgrades to Level C or B PPE may be required.
- Extraction of groundwater except as required for groundwater monitoring.
- Swimming or wading in the pond or trespassing in the marsh within 200 feet of the causeway.
- Subsistence fishing from the pond (addressed by placement of signs at Site 3).
- Any activities or uses not specifically stated under "authorized activities" listed above that could result in continuous, long-term exposure to children.

Proposed Changes in Use. Any proposed changes in permissible uses at Site 3 that may result in the development of Site 3 for residential use shall be evaluated by the MCRD Parris Island Natural Resources and Environmental Affairs Office (NREAO) to determine whether or not the proposed changes might pose potential risks to human health or the environment. Any proposed change in use of the site will be subject to review and approval by U.S. EPA Region 4 and the South Carolina Department of Human Health and Environmental Control (SCDHEC) in accordance with the approved LUC-MOA.

Deed Covenants and Conveyance of Title. Should the decision later be made to transfer ownership of the property encompassing Site 3 to any private person or entity, then the Navy shall either (1) take all actions necessary to remediate the site to then-existing residential (i.e., unrestricted use) cleanup standards prior to effecting such transfer or (2) deed record with the Beaufort County Register of Deeds appropriate restrictive covenants prohibiting future residential usage of the property. Should the Navy not have the requisite legal authority to record such deed restrictions, then it shall take all steps necessary to ensure that the cognizant federal agency with such authority does so unless the property is remediated to residential standards prior to such transfer. Should cleanup of the site not be effected to residential standards, then notification will be given to U.S. EPA Region 4 and SCDHEC at least 30 days prior to any conveyance of title to the site to any third party(ies) and the purchaser(s) of the site will be advised via the deed documentation as to then-existing site conditions and any/all associated LUCs and long-term monitoring requirements.

Posting. This LUCIP will be referenced in all MCRD Parris Island Utility Maps and in MCRD Parris Island's Base Master Plan. In conjunction with MCRD Parris Island's Base Master Plan and utility maps, this LUCIP

is included in the Land-Use Control Assurance Plan Agreement. No maintenance or construction activities on or near Site 3 should be planned without first referring to these documents.

5. DECISION DOCUMENTS

The following decision documents have been issued for Site 3:

- Interim Record of Decision (IROD) for Soil Remedial Action at Site 3, MCRD Parris Island, South Carolina dated September 2000.

6. OTHER PERTINENT INFORMATION (REFERENCES)

TtNUS, 1999. RCRA Facilities Investigation/Remedial Investigation for Site/SWMU 3, MCRD Parris Island, South Carolina. Prepared for Department of the Navy, Southern Division, Naval Facilities Engineering Command, North Charleston, South Carolina, November.

TtNUS, 2000. Proposed Plan for Soil Interim Remedial Action at Site/SWMU 3, MCRD Parris Island, South Carolina. Prepared for Department of the Navy, Southern Division, Naval Facilities Engineering Command, North Charleston, South Carolina, June.