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MCRD PARRIS ISLAND  
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LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR NO FURTHER ACTION AT SITE 2 BORROW PIT LANDFILL AND SITE 15  
DIRT ROADS MCRD PARRIS ISLAND SC  
10/1/2000  
U S EPA REGION IV

10-186

05.01.02.0001

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Stephen A. Cheney  
Commander  
Marine Corps Recruiting Depot - Parris Island  
P. O. Box 19001  
Parris Island, SC 29906-9001

SUBJ: Draft Record of Decision for No Action/No Further Action at Site/SWMU 2 and  
Site/SWMU 15 (Revision 0, September 2000)  
Marine Corps Recruit Depot Parris Island, South Carolina  
EPA ID#: SC6170022767

Dear General Cheney:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the above referenced document. EPA's comments are enclosed.

If I can be of assistance in any way or you have questions about these comments, please call me at (404)562-8506.

Sincerely,

Robert H. Pope  
Federal Facilities Branch  
Waste Management Division

cc: Tim Harrington, MCRD  
Jerry Stamps, SCDHEC  
Don Hargrove, SCDHEC  
Art Sanford, NAVFAC

**EPA Comments on  
Draft Record of Decision for No Action/No Further Action at Site/SWMU 2 and  
Site/SWMU 15 (Revision 0, September 2000)  
U.S. Marine Corps Recruit Depot, South Carolina  
EPA ID# SC6170022762**

GENERAL COMMENT:

The table summarizing the maximum HQs calculated during the initial COPC screening process and food-chain modeling should be edited to further support that no action is needed to be protective of ecological receptors. It is suggested to add footnotes indicating that metal concentrations are less than background or reference area concentrations for all HQs greater than 1 (where this is true). Food chain modeling results using LOAELs should be added to the table and the revised HQ for the shrew with a more realistic foraging factor should be added as a footnote. Otherwise, the table and the text do not mesh well and confuse the reader.

SPECIFIC COMMENTS

1. Page 1-1, section 1.1, 1st paragraph, 2nd sentence. Consider replacing the word "allegedly" with "reportedly" to maintain a non-adversarial tone in the document.

X 2. Page 1-2, section 1.3. A summary assessment of the site (investigative history and findings) should be included prior to the description of the selected remedy.

3. Page 1-2, section 1.3, 1st paragraph, 2nd sentence. Consider adding a phrase to the end of the sentence such as "... and this action complies with those federal and state requirements that are applicable or relevant and appropriate."

4. Page 1-2, section 1.3, 1st paragraph. Please add an additional sentence to the end of this paragraph stating that this action constitutes the final remedy for Sites 2 and 15, and is considered the most cost-effective approach for the sites.

5. Page 2-1, section 2.1, 2nd paragraph, 2nd sentence. Clarify the location of Site 2. Consider specifying that it is in the north-central portion of Horse Island, in the northern section of the MCRD Parris Island as shown on Figure 2-1 (the reference to Figure 2-2 would be appropriate at the end of the 3rd sentence).

6. Page 2-1, section 2.1, 2nd paragraph, 4th sentence. Clarify the location of Site 15. Consider adding "...in the southwestern portion of MCRD Parris Island."

7. Page 2-2, 1st and 2nd paragraphs. Consider adding an affirmative statement, at the end of or after the Site 2 and Site 15 descriptive paragraphs, regarding enforcement actions at the sites (i.e., there have been none).

8. Page 2-3, section 2.4, 1st paragraph, 1st sentence. The Site 3 IROD indicates that there are 45 sites being evaluated at MCRD, and this document indicates 46. If this change in number is due to the potential "new" SWMU discussed at the last Partnering Team meeting, please maintain 45 sites as the official count pending action regarding the "new" SWMU.

9. Page 2-3, section 2.4, 2nd paragraph, 2nd sentence. Consider striking the word "both" for clarity.
10. Page 2-3, section 2.4, 2nd paragraph, 3rd sentence. Consider adding the word "Additionally," to the beginning of this sentence for clarity.
11. Page 2-4, section 2.5.1, 2nd paragraph, 1st sentence. Consider changing the word "removed" to "disturbed (excavated or graded)" since the dirt roads do not appear to have been constructed by cutting and removal of the soils.
12. Page 2-5, section 2.5.2, 2nd paragraph, 5th sentence. Please add "tidal influence" to the series describing the causes of water table fluctuations.
13. Page 2-5, section 2.5.2, 3rd paragraph, 1st sentence. Consider adding "overlying" between "and" and "confining" for clarity.
14. Page 2-6, section 2.5.3, 1st paragraph. Consider changing "MCRD Parris Island" to "the MCRD" for clarity (Horse Island is not on Parris Island per se). Describing Site 2 as a "slight" depression might be a little understated. Add a phrase, such as "nor is it anticipated to be used for such in the future", to the end of the 4th sentence. ~~Finally, state what the intended future use of the area is according to the MCRD Master Plan.~~
15. Page 2-6, section 2.5.3, 2nd paragraph, 3rd sentence. Add the phrase "..., but it is used for recreation (boat launch and fishing)." to the end of the sentence.
16. Page 2-10, section 2.6, 3rd paragraph, 5th sentence. Please clarify that the maximum detected concentration of several analytes exceeded background in these media despite being below RBC's and ESV's.
17. Page 2-12, section 2.7.1, 4th paragraph, 3rd sentence. Please replace "accepted" with "acceptable".
18. Page 2-13, section 2.7.1, 3rd paragraph, 2nd sentence. Please replace "estimate" with "estimated".
19. Page 2-13, section 2.7.1, 5th paragraph, 1st sentence. Clarify whether the contamination is considered to be an artifact of sampling or of laboratory analysis.
20. Page 2-14, section 2.7.2, 4th paragraph, 7th sentence. Provide additional text describing that the HQs for most receptors at Site 2 exceeded 1 (according to the table on the next page), and provide discussion of these exceedances.
21. Page 2-15. Please provide an additional section before the Explanation of Significant Changes to present the selected remedy/response action. This should include text to the effect that "Based on the absence of excess risk to human health or the environment from contaminants in the media investigated, a no action/no further action remedy has been selected as the appropriate response action for Sites 2 and 15. This remedy is considered to meet all state and federal ARARs." Additionally, a summary of this remedy with regard to the nine decision criteria should be considered.
22. Page 2-15, section 2.8. Consider re-naming this section "Statutory Determinations and Explanation of Significant Changes", and provide additional text describing the statutory

determination (see IROD for Site 3, page 2-23, section 2.10, last paragraph for example).

23. Page 2-25; Table 2-9. Since Aroclor-1254 was not detected during the RI/RFI (see Table 2-1), please provide an explanation for its presence as a COPC (e.g., provide a footnote describing that it was detected during a previous investigation, and that previous investigation data was used to calculate risk during the RI/RFI). If the previous investigation data was used during the RI/RFI, its inclusion with the data tables in this ROD should be considered.

### **COMMENTS GENERATED BY EPA'S OFFICE OF REGIONAL COUNSEL**

The ROD, for the most part, reasonably documents the decision of No Action/No Further Action. There are minor documentary changes that would clarify the support for the No Action decision, as follow.

1. The ROD uses both "No Action" and "No Further Action" in describing the nature of the action documented in the ROD. The use of the language "No Further Action" conveys the notion that a prior removal or other response action addressed the contamination and eliminated the need for further remedial action. There is no description, however, of such prior action. The ROD, therefore, appears to describe a "No Action" decision. Please clarify. (See sections 1.2, 1.3, 2.3, 2.8, and other sections as appropriate.) As this is primarily a CERCLA document, it will be necessary to state why the No Further Action language is being used (i.e., to satisfy the SCDHEC's request for RCRA integration).
2. Section 1.3. Description of the Selected Remedy/Statutory Determinations. The first sentence of this section is superfluous to the notion that no action is being selected as the remedial decision; please reword this section as follows"  
The MCRD partnering team has agreed that ~~the remedial action that will best protect human health and environmental concerns is no action/no further action.~~ Under this remediation plan, no remedial action is required to ensure protection of human health and the environment at Sites 2 and 15. Consequently, no active treatment or monitoring will be conducted at Sites 2 and 15.
3. It is suggested that the table on page 2-15 be placed before the explanation of why the remedy is protective of the environment even though the table shows most HIs in excess of 1.0. With the table first, and then the explanation of why, even with those values, the remedy is protective, it would be less confusing.