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MCRD PARRIS ISLAND
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EMAIL REGARDING NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION
COMMENTS ON DRAFT RESOURCE CONSERVATION AND RECOVERY ACT FACILITY
INVESTIGATION REPORT FOR SITE 12 JERICHO ISLAND DISPOSAL AREA MCRD PARRIS
ISLAND SC
1/9/2001
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

1D-189

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Brayack, David

From: Sanford, Arthur (Efdsouth) [SanfordAF@EFDSOUTH.NAVFAC.NAVY.mil]
Sent: Friday, January 12, 2001 9:50 AM
To: Dave Brayack Tetra-Tech (E-mail)
Subject: FW: NOAA Comments - Jericho Island RI/RFI



010108 CRC
cmt-Site12 RI Rpt

-----Original Message-----

From: tom_dillon_crc4@hazmat.noaa.gov
[mailto:tom_dillon_crc4@hazmat.noaa.gov]
Sent: Tuesday, January 09, 2001 7:01 AM
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Subject: NOAA Comments - Jericho Island RI/RFI

Subject comments attached (Word Mac) and pasted below.

MEMORANDUM

TO: Parris Island Partnering Team
FROM: Tom Dillon, Ph.D.
SUBJECT: NOAA Comments on Draft RI/RFI Report for Site 12 Jericho Island
DATE: January 8, 2001

The U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA) appreciates the opportunity to comment on Draft Remedial Investigation/RCRA Facilities Investigation for Site 12/SWMU 10 - Jericho Island Disposal Area, Marine Corps Recruit Depot, Parris Island, South Carolina by Tetra Tech NUS, Inc. for Southern Division, Naval Facilities Engineering Command, October 2000. If you have any questions, please contact me at 404-562-8639, FAX 404-562-8662 or tom.dillon@noaa.gov.

1. NOAA concurs with the Ecological Risk Summary (§7.10) that certain pesticides, PCBs and inorganics pose to risk aquatic receptors and with the report's recommendation to proceed with a FS/CMS for surface soils and sediments, (§8.9.0 and §8.10.0, respectively) with the following provisos.
 - a. Soils - Recommendation in §8.9.0 correctly focuses on sample SS-14 which is located within the large intertidal debris pile at the south end of Jericho Island. However, the report's recommendation to ignore a priori other surface soils should be omitted. The FS/CMS should consider the feasibility of addressing PAH-contaminated soils in the vicinity of

samples SS-08 and SS-12. Also, it appears that some of the debris piles (Figure 4-1) and geophysical anomalies (Figure 1-3) have not been sampled, but should be. The location of all debris piles should be added to all figures. The location of the dirt road should be added to Figure 1-3 for clarity.

b. Sediments - Recommendation in §8.10.0 correctly focuses on two 1995 samples collected within the large debris pile at the south end of Jericho Island. However, the recommendation to ignore other sediments should be omitted. Sample SD-14, also located within the intertidal debris pile, should be considered in the FS/CMS. This sample routinely contained the highest concentration of chemicals from the 1998/1999 investigation (Table 7-4, Figure 4-5). In addition, the report's own ecological risk summary highlights sample SD-14 (along with the two 1995 samples) as being most "risky".

2. Other Comments

a. Provide rationale for selecting soil and sediment sampling locations.

Explain why some debris piles shown in figures and geophysical anomalies (Figure 1-3) were not sampled. A brief discussion in §1.4.3 explaining the results and significance of the geophysical survey would be helpful. If this rationale is amply described in the team's partnering minutes, consider appending them to this report.

b. Footnotes in Table 3-10 indicate grain size analysis was conducted on all sediment samples. Please report these results in Section 7.0.

c. Include all 13 PAHs, not just detected PAHs, for the Total sediment PAH expression in Table 7-4. Use 1/2 detection limit for U-flagged results.

d. In the future, please provide a Total PAH expression for soil results (Table 7-6) as suggested above for sediments.

e. The considerable food web modeling effort in §7.0 provides minimal value to decision-making at this stage of the ecological risk assessment. Consider deleting this analysis in the Final RI/RFI report. Instead, concentration on revising the abiotic screening/refinement tables per Parris Island Ecological Risk Assessment Work Group guidance.

f. The most contaminated soil and sediment samples (discussed in comment

1.) are all located within the large intertidal debris field at the south end of Jericho Island. Consider combining recommendations §8.9.0 and §8.10.0 to more clearly convey this spatial focus. This also suggests the FS/CMS can adopt a more narrow spatial focus (assuming the unsampled debris piles do not represent unacceptable risks).