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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 21 OIL/WATER SEPARATOR MCRD PARRIS ISLAND  
SC  
1/9/2001  
NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

**Brayack, David**

1D-190

**From:** Sanford, Arthur (Efdsouth) [SanfordAF@EFDSOUTH.NAVFAC.NAVY.mil]  
**Sent:** Friday, January 12, 2001 9:51 AM  
**To:** Dave Brayack Tetra-Tech (E-mail)  
**Subject:** FW: NOAA Comments - O/W Separator RI/RFI



010108 CRC  
cmt-SWMU 21 RI Rpt

16.01.00.0011

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

**From:** tom\_dillon\_crc4@hazmat.noaa.gov  
[mailto:tom\_dillon\_crc4@hazmat.noaa.gov]  
**Sent:** Tuesday, January 09, 2001 7:14 AM  
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**Subject:** NOAA Comments - O/W Separator 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 SWMU 21 (Oil/Water Separator)

**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 SWMU 21 - Weapons Power Plant Oil/Water Separator, Marine Corps Recruit Depot, Parris Island, South Carolina by Tetra Tech NUS, Inc., for Southern Division, Naval Facilities Engineering Command, September, 2000. If you have any questions, please contact me at 404-562-8639, FAX 404-562-8662 or tom.dillon@noaa.gov.

1. Sampling is insufficient for a RI/RFI - The largest and most significant uncertainty in this RI/RFI is it's sole reliance on just 2 sediment samples collected four years apart. This level of sampling may be appropriate for a PA/SI but not for a RI/RFI. Nature and extent cannot be adequately characterized with 2 samples. Likewise, the human health and environmental risk estimates are unacceptably uncertain. Therefore, additional samples should be collected to adequately characterize chemical nature and extent and risks. Because this is an active facility, it may be appropriate to collect these additional samples under the auspices of a site monitoring program.

## 2. Other Comments

§1.4.2 The SWMU history should include dates for the following events:

when operations at the Weapons Power Plant began, installation of the oil/water separator, installation of the 6" plastic discharge pipe in the saltmarsh and dredging events in the saltmarsh channel (Figure 1-2). Also, please provide estimates for effluent discharge rates and/or volumes to convey to the reader the magnitude of operations. These chronologies and information are necessary for developing the site's conceptual model.

§1.4.3 Report the method use to collect the 1995 sediment sample.

§4.0 Report results for the 1999 duplicate sample (see §3.1.1) as well as Pesticide/PCB analysis of the 1995 sample (see §1.4.3).

§7.2.5 Delete measurement endpoints as they are inappropriate for a Steps

1, 2, 3 ERA. Provide separate assessment endpoints for forage fish and higher trophic level fish.

§7.9.3 This section acknowledges the uncertainties associated with not

collecting fine-grain sediment samples from depositional areas. It addresses this uncertainty by noting the two samples were collected in "depressions ... very near the discharge pipe". Rather than representing depositional areas, these depressions may be splash ponds created during high volume discharge events. If so, sediments from these depressions would not represent fine-grain material from depositional environments (as per EPA guidance). Data on sediment grain size and organic carbon content, as requested in prior NOAA comments on the SWMU 21 Work Plan, would have eliminated this uncertainty.

Table 7-3 Because there are only 2 samples in this RI, consider reporting individual sample results in lieu of the "Range of Detection" column. Report the detection limit for "U-flagged" results. Report the sum of 13 PAHs and compare to EPA Region 4 sediment screening value. In this summary expression, use 1/2 detection limit for "U-flagged" results.

§8.0 The report concludes "there is no significant risk to human health and ecological receptors", "no additional sampling or monitoring is warranted" and recommends "no further action". None of these conclusions and recommendations can be supported on the basis of 2 sediment samples collected four years apart.