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MCRD PARRIS ISLAND  
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EMAIL OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR SITE 1 INCINERATOR LANDFILL AND SITE 41 FORMER INCINERATOR  
MCRD PARRIS ISLAND SC  
6/12/2002  
U S EPA REGION IV

## **Sladic, Mark**

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**From:** Pope.Robert@epamail.epa.gov  
**Sent:** Wednesday, June 12, 2002 11:46 AM  
**To:** sanfordaf@efdsouth.navy.mil; scaturdm@COLUMB34.DHEC.STATE.SC.US;  
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gbenrisk@mindspring.com; Sladic, Mark; wendtp@mrd.dnr.state.sc.us;  
harringtonj@mcrdpi.usmc.mil; Tom.Dillon@noaa.gov  
**Subject:** EPA comments on Site 1 ROD



Site 1 Draft ROD  
EPA Comments....

Hi all,

Attached are the EPA comments. Hard Copy in the mail today. I apologize for the numerous comments. Some of them are duplicative, but still necessary. After adding my comments to David's and Martha's the list got pretty long. However, the great majority of them are minor text changes, not major issues. Also, FYI, David, Gary and myself are going to try and work out some ideas for native plants/eco restoration for the cap as everyone seemed to like that idea. Once we have something put together we'll share it with the team asap.

Thanks,

(See attached file: Site 1 Draft ROD EPA Comments.pdf)

Robert H. Pope  
USEPA Region 4  
61 Forsyth Street  
Atlanta, GA 30303  
(404)562-8506  
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June 12, 2002

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Joseph J. McMenamain  
Commander  
Marine Corps Recruiting Depot - Parris Island  
P. O. Box 19001  
Parris Island, SC 29906-9001

SUBJ: Draft Record of Decision May 2002  
Site/SWMU 1 - Incinerator Landfill and SWMU 41 Former Incinerator  
Marine Corps Recruit Depot Parris Island, South Carolina  
EPA ID#: SC6170022767

Dear General McMenamain:

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 regarding this issue, please call me at (404)562-8506.

Sincerely,

Robert H. Pope  
Federal Facilities Branch  
Waste Management Division

cc: Tim Harrington, MCRD  
David Scaturo, SCDHEC  
Don Hargrove, SCDHEC  
Art Sanford, NAVFAC

## **Draft Record of Decision**

**Site/SWMU 1 – Incinerator Landfill and SWMU 41 – Former Incinerator**

**U.S. Marine Corps Recruit Depot, South Carolina**

**EPA ID# SC6170022762**

### **General Comments:**

1. The draft Record of Decision (ROD) is well written and generally follows EPA guidance for RODs'. Although the document does not exactly follow the model outline and recommended language/format presented in EPA guidance, all pertinent information is contained in the ROD.
2. A summary paragraph should be included in the ecological risk assessment portions of the report that describes the process used to go from the initial description of COPCs (as presented in Table 2-8) to those for which remedial goal options (RGO) were developed (Table 2-9). Once this process has been discussed, a final list of COCs for the site should be presented. Also, additional text should be included to clarify how RGOs were selected for ecological COCs. The scientific basis and risk management decisions that drove the selection of those values should be summarized and presented in this ROD.
3. In addition, a final groundwater COC table is needed similar to the sediment/soil table presented as Table 2-9. Tables 2-6 and 2-8 only present the COPC list for multiple media. As the project moves into Long Term Monitoring, Table 2-9 will be used to determine which contaminants are monitored in sediment. A groundwater COC table is needed to address the groundwater contaminants that will also be monitored.

### **Specific Comments:**

1. Page 1-1, Section 1.1, Second Paragraph. The Superfund site identification number for MCRD Parris Island is 04NY03488.
2. Page 1-2, Section 1.3, 1st Paragraph, 6th Sentence. Please clarify that EPA considers carcinogenic risks lower than 1 in 1,000,000 to meet free-release criteria, and that risks within the risk range (1.0E-06 to 1.0E-04) may be managed.
3. Page 1-2, Section 1.3, 2<sup>nd</sup> and 3<sup>rd</sup> Paragraphs. Add a reference to table 2-7 which shows the actual risk values.
4. Page 1-3, Section 1.3, 2<sup>nd</sup> Paragraph. The list of chemicals needs to be stated in the text and the receptors that have had risk shown also need to be listed in the text.

5. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 1<sup>st</sup> Bullet. Change “over” to “above”.
6. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 2<sup>nd</sup> Bullet. Change “common” to “native”
7. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 3<sup>rd</sup> Bullet. After “then” insert the following text “the vegetation and sediment will be”.
8. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 4<sup>th</sup> Bullet. It is suggested that the bullet be split into two bullets describing the Long Term Monitoring followed by a paragraph describing the Land Use Controls.
9. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 4<sup>th</sup> Bullet. Insert the following text at the end of the sentence, “along with an annual report”.
10. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 4<sup>th</sup> Bullet, 6<sup>th</sup> Sentence. After the sentence, the following needs to be inserted. “During the Remedial Design/Remedial Action process, Long Term Monitoring Plans for groundwater and sediment will be developed and submitted.”
11. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 4<sup>th</sup> Bullet. It is imperative that this section link to the existing table for sediment RGOs for long term monitoring and be linked to a new table for groundwater contaminants which will be monitored. Refer to General Comment 3.
12. Page 1-4, Section 1.4, 1<sup>st</sup> Paragraph, 4<sup>th</sup> Bullet. Additional text should be added to summarize the expected outcome of implementing the action in terms of timeframes and resource recovery. This would include that remedial goals would be achieved within one year, that 1.8 acres of wetlands would be created or restored, and that robust provisions will be in place to ensure long-term protectiveness.
13. Page 1-4, Section 1.4, Last Paragraph, 2<sup>nd</sup> Sentence. It appears the word “interim” should be inserted between “those” and “or”.
14. Page 1-4, Section 1.4, 2<sup>nd</sup> Paragraph, 3<sup>rd</sup> Sentence. Add a reference to Appendix A for the first call out of the Land Use Control Implementation Plan (LUCIP).
15. Page 1-6, Section 1.7. A signature block that includes EPA must be in the ROD.
16. Page 2-4, Section 2.4, 1<sup>st</sup> Paragraph. Additional text should be included in this paragraph to note that EPA also has designated Site 1 and SWMU 41 as Operable Unit 1 for purposes of tracking within CERCLIS.

17. Page 2-7, Section 2.5.3, 1st Paragraph, 3rd Sentence. As stated in subsequent portions of the ROD, the high salinity of shallow groundwater at Site 1 is also a major contributor to the determination that groundwater is non-potable. Revise the text to reflect this.
18. Page 2-9, Section 2.6, 3rd Paragraph. Text must be added to clarify that during the RI sampling points were located around the perimeter of the site in accordance with a presumptive remedy approach to investigation. For this reason, waste materials were not sampled nor chemically characterized.
19. Page 2-10, Section 2.6, 1<sup>st</sup> Full Paragraph, Last Sentence. The text needs to be re-worded or deleted in light of the next paragraph which states that many of the same contaminants are present in surface water.
20. Page 2-11, Section 2.7.1, 4th Paragraph, 2nd Sentence. See specific comment 2.
21. Page 2-12, Section 2.7.1, 6th Paragraph, 2nd Sentence. A statement must be added to the text after this sentence, such as: " Similarly, since waste materials were not sampled, the defined risks may under-represent actual site risks."
22. Page 2-14, Section 2.7.2, 2<sup>nd</sup> Paragraph. The text needs state that risks are also present to terrestrial and aquatic plants, soil invertebrates, and benthic receptors, as represented in the following table.
23. Page 2-14, Section 2.7.2, unnumbered table. This table should be revised to include which contaminants produced the elevated HQs. The contaminants present in this table should correspond with the list of final COCs. In addition, in the first cell in the Hazard Quotients column two different values for the HQ for surface water are presented. Revise the table.
24. Page 2-15, Section 2.8.1. Discussion should be added to clarify how the ecological RGOs were selected. It is unclear why the results of the food chain models are discussed in this ROD when all the ecological RGOs are either EPA Region 4 ecological screening values (ESV) or background values.
25. Page 2-16, Section 2.8.2, 3rd Paragraph, 2nd Bullet. The second "of" should be changed to "for."
26. Page 2-17, Section 2.8.2, Capital Costs and O&M Costs. These costs need to be broken out more for all of the alternatives. At a minimum, the major portions of the remedy should be shown (Excavation and consolidation of sediment, MNA of PAHs, Excavation

and consolidation of waste materials, Installation of the cap, Restoration and monitoring of this salt marsh, Implementation of the LUCs). Also, the O&M costs should be broken out to show the engineering costs (Cap maintenance, LTM) and the LUC costs.

27. Page 2-20, Section 2.8.4, Overall Protection..., 2<sup>nd</sup> Paragraph, Third Sentence. After "human health", insert "and the environment". After "preventing", delete "human".
28. Page 2-21, Section 2.8.4, Compliance with ARARs, 4<sup>th</sup> Paragraph. Add text which details the differences between how the coastal wetlands would be restored under the different remedies. Similar to the more detailed description in Paragraph 2 of the same subsection.
29. Page 2-24, Section 2.10, 1st Paragraph. Text should be added to highlight why Modified Alternative 2a was selected. This should include the balance achieved among the various criteria and any trade-offs made (e.g., no unrestricted use, no treatment, etc.).
30. Page 2-24, Section 2.10, 2nd Paragraph, 3<sup>rd</sup> Sentence. Clarify that a portion of the sediment excavated under the selected remedy is also for the protection of human health (as indicated in the remedy description on page 2-17).
31. Page 2-25, Section 2.10, 2<sup>nd</sup> Paragraph, 2<sup>nd</sup> Sentence. Change "over" to "above".
32. Page 2-25, Section 2.10, 4<sup>th</sup> Paragraph, 1<sup>st</sup> Sentence. Change "common" to "native".
33. Page 2-25, Section 2.10, 4<sup>th</sup> Paragraph, 2<sup>nd</sup> Sentence. After "then" insert the following text "the vegetation and sediment will be".
34. Page 2-25, Section 2.10, 5<sup>th</sup> Paragraph. It is suggested that the paragraph be split into two paragraphs describing the Long Term Monitoring followed by a paragraph describing the Land Use Controls.
35. Page 2-25, Section 2.10, 5<sup>th</sup> Paragraph, 5<sup>th</sup> Sentence. Insert the following text at the end of the sentence, "along with an annual report".
36. Page 2-25, Section 2.10, 5<sup>th</sup> Paragraph, 6<sup>th</sup> Sentence. After the sentence, the following needs to be inserted. "During the Remedial Design/Remedial Action process, Long Term Monitoring Plans for groundwater and sediment will be developed and submitted."
37. Page 2-25, Section 2.10, 5<sup>th</sup> Paragraph. It is imperative that this section link to the existing table for sediment RGOs for long term monitoring and be linked to a new table for groundwater contaminants which will be monitored. Refer to General Comment 3.

38. Page 2-26, Section 2.10, last Paragraph. Additional text should be added to summarize the expected outcome of implementing the action in terms of timeframes and resource recovery. This would include that remedial goals would be achieved within one year, that 1.8 acres of wetlands would be created or restored, and that robust provisions will be in place to ensure long-term protectiveness.
39. Page 2-40, Table 2-7, Adult Resident, 1st and 3rd Rows, Last Column. The existence of elevated hazard indices is indicated for two chemicals, but the chemical names were omitted. Please revise accordingly.
40. Page 2-43, Table 2-9. A more accurate rationale should be included for not developing a sediment RGO for arsenic. Currently the table incorrectly states that the maximum concentration (18.8 mg/kg) is below the RGO. However, the maximum arsenic concentration exceeds both the site background value and the Region 4 ESV.
41. Page 2-48, Table 2-11, Action-Specific ARARs, 1st Row, 3rd Column. Based on the description and cost estimate for the selected remedy, well abandonment and well installation are both activities that will be performed. For this reason, it seems R.61-71 should be considered applicable rather than potentially applicable.
42. Page 2-49, Table 2-11, Action-Specific ARARs, 8th Row, 3rd Column. Based on the description for the selected remedy, land disturbance activities requiring stormwater management will be performed. For this reason, it seems R.72-300 and R.72-405 should be considered applicable rather than potentially applicable.
43. Pages A-1 through A-4. LUCIP. The 5-Year Review process, in addition to being a CERCLA requirement, is an element of the land use controls component of the selected remedy, and should be included in the LUCIP. Specifically, provision for site access and reporting should be included, and Attachment B should be referenced.
44. Page A-1, Section 1., 2<sup>nd</sup> Paragraph, Last Sentence. Reword the sentence to the following: "Site remediation will initially address these concerns; the MCRD Parris Island, U.S. EPA Region 4, and the South Carolina Department of Health and Environmental Control (SCDHEC) agreed that LUCs should be implemented at Site 1 and SWMU 41 to prevent direct contact with consolidated soil, sediment, and waste to address risks from the contamination that will remain on site under the cap system."
45. Page A-2, Section 4, 1st Paragraph, 2nd Sentence. A reference to Attachment A should be included at the end of this sentence. Additionally, a provision for immediate regulatory notification of off-normal inspection results should be included. For example,

in the event a large storm breaches the cap, regulatory involvement in the damage assessment and repair is necessary.

46. Page A-2, Section 4, 2nd Paragraph, 4th Bullet, 2nd Sentence. The word “personnal” is misspelled.
47. Page A-3, Section 4, Unauthorized Activities. Add a bullet that states: Intrusive construction activity except as permitted by MCRD NREAO, EPA, and SCDHEC. Also, add a bullet that states: Installation of wells except approved monitoring wells.
48. Page A-3, Section 4, 2nd Bullet. Additional text should be included to clarify that landfill contents may not be released to the environment during construction activities.
49. Page A-3, Section 4, Proposed Changes in Use. Delete the following text: “that may result in the development of Site 1 and SWMU 41 for residential use” and “in accordance with the approved LUC and Memorandum of Agreement (MOA).”
50. Page A-3, Section 4. Insert a new paragraph titled “Conveyances, Easements, and Leases”. Copy the text from Page 2-26, Section 2.10, 1<sup>st</sup> Full Paragraph that begins “LUCs will be stated...” verbatim for the new paragraph in the LUCIP.
51. Page A-5, Attachment A, 1st Paragraph, 1st Sentence. A comment sheet does not follow this form; perhaps this should be re-phrased to “an attached comment” sheet.
52. Page A-6, Attachment B, 1st Paragraph, 5th Bullet. The phrasing “...repetitive problems are present which are present which would...” should be revised.