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U S NAVY RESPONSES TO SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON DRAFT FIVE YEAR REVIEW REPORT  
MCRD PARRIS ISLAND SC (PUBLIC DOCUMENT)

6/1/2005

NAVAL FACILITIES ENGINEERING COMMAND SOUTHERN DIVISION

**Response to Comments  
Draft Five Year Review Report  
June 2005**

**Jerry Stamps Comments**

**1. Comment: General**

The Department agrees with the comments from the EPA, dated July 8, 2005, regarding the Five Year Review Report.

**Response:** No response required. Please see RTC for EPA comments.

**2. Comment: Summary Form, Issues**

This section should specifically discuss how "inter-base notification and communication regarding the LUC" will be improved.

**Response:** The summary form will be updated. The following bulleted items, as identified in the 18 July 2005 USMC letter to SCDHEC, will be added to Section 9.0 and the Summary Form:

- MCRD will place signs along the causeway to more clearly identify the site restrictions: "No digging. Contact the Environmental Office at ext. 3423." The signs will be mounted on the utility poles, facing in both directions.
- MCRD will continue to develop the Geographic Information System (GIS). One planned upgrade is to provide Depot-wide access via the web browser. (Any advancement to the GIS is encumbered by issues related to the Navy Marine Corps Intranet (NMCI) which controls all of the hardware and software used throughout the Department of the Navy.)
- MCRD will develop a Depot Order specific to land use controls to create a document that identifies all of the environmental land use restrictions throughout the Depot to be provided in its draft form by September 6, 2005.
- The Installation Restoration Collaboration Gateway allows all team members to view the IR-specific GIS data to ensure that it adequately reflects the program's status, and there is a Land Use Control Section that is under development.
- MCRD will enhance the environmental education program to make that awareness training an annual requirement. Additionally, managers of sections with the potential to significantly impact the environment, receive National Environmental Policy Act (NEPA) training.
- MCRD will continue development of the environmental management system (EMS), providing another layer of visibility and reinforcement for the land use controls. More significantly, the EMS provides a system of auditing and management review. The audits will ensure that written procedures are both adequate and being complied with.

**3. Comment:** Summary Form, Protectiveness Statement(s)

The Department does not agree that remedy for SWMU 3, and perhaps other sites with LUCs selected as part of the remedy, is necessarily protective of human health and the environment. Considering the LUC violations that have occurred recently, it is apparent that the current system of maintaining LUCs is ineffective. Changes must be made to ensure that LUCs are adequately maintained before such a determination is made.

**Response:** The following Protectiveness Statement from the supplemental EPA guidance will be used instead:

The remedy is considered protective in the short-term; however in order for the remedy to be protective in the long-term, follow-up actions need to be taken. In order for the remedy to remain protective in the long-term, ICs that prevent future disturbance of the cap must be in place to prevent exposure to contaminants.

**4. Comment:** Section 1.0, 1<sup>st</sup> paragraph

Please identify OU1 by its SWMU designation as well.

**Response:** The 'OU' notation was an error. Section 1 will be revised to replace 'site' with 'site/SWMU'.

**5. Comment:** Section 1.0, 2<sup>nd</sup> paragraph

Please reference OSWER Directive 9355.7-03B-P "Comprehensive Five-Year Review Guidance".

**Response:** Please note the first paragraph on page 2 where the guidance document is identified by its US EPA number. The OSWER Directive number will also be added in this same location: EPA's Comprehensive Five Year Review Guidance (EPA 540-R-01-007 / OSWER Directive 9355.7-03B-P).

**6. Comment:** Section 1.0, 7<sup>th</sup> paragraph

The Department recommends referencing the Federal Facilities Agreement (FFA) for the list of sites at MCRD.

**Response:** The FFA was the source for this information. The last sentence will be revised as follows: Specific details for each site are provided in this document and in the FFA (November 2004).

**7. Comment:** Section 1.0, last paragraph, Typo

Remove "be" from this sentence.

**Response:** Agree.

**8. Comment:** Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 1<sup>st</sup> par.

Given the land use control violations which recently occurred with regard to SWMU 3, all internal policies and procedures must be reviewed and revised as necessary to ensure proper communication of land use controls to all parties that may be involved in activities which may alter the effectiveness of the remedy. Additional actions such as placing signs on property with land use controls may be necessary.

**Response:** The revised Five Year Review will include the MCRD's 18 July 2005 letter, detailing policies and procedures, as an attachment.

9. **Comment:** Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 2<sup>nd</sup> par.  
The text accurately states that the Long Term Monitoring Work Plan for SWMU 1 is currently under review. The Department has not completed the review as of the date of these comments.

**Response:** No response required.

10. **Comment:** Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 3<sup>rd</sup> par.  
The language in this paragraph is somewhat confusing. The Department recommends the following change to the second sentence of the 3<sup>rd</sup> paragraph: "Sediment concentrations exceeding RGOs were identified at the south-western...."

Additionally, the Department recommends the following change to the last sentence of the 3<sup>rd</sup> paragraph: "Therefore, the EPA and SCDHEC agreed to terminate the sediment excavation provided...". These are just suggested changes. Variations of these suggested changes may be acceptable.

**Response:** The specific language identified by SCDHEC is more reader-friendly and will be incorporated.

11. **Comment:** Section 4.0, Site 1, Land-Use Controls and Long-Term Monitoring, 4<sup>th</sup> par.  
The text should clarify if the O&M costs presented include the costs associated with the maintenance of land use controls.

**Response:** The first sentence of the subject paragraph will be replaced with the following: In the ROD, annual O&M costs were estimated at \$21,000 to \$70,000, including maintenance of land use controls.

12. **Comment:** Section 4.0, Site 3, 1<sup>st</sup> par  
The text should clarify that the Department approved the IROD as an Interim Measure under the RCRA program.

**Response:** The SCDHEC portion of the parenthetical will be replaced with the following: SCDHEC approved the IROD as an Interim Measure under the RCRA program.

13. **Comment:** Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 1<sup>st</sup> par.  
Please see comment #8.

**Response:** Same RTC as comment 8: The revised Five Year Review will include the MCRD's 18 July 2005 letter, detailing policies and procedures, as an attachment.

14. **Comment:** Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 4<sup>th</sup> par.  
The text should clarify if the O&M costs presented include the costs associated with the maintenance of land use controls.

**Response:** The first sentence of the subject paragraph will be replaced with the following: In the ROD, annual O&M costs were estimated at \$58,700 to \$74,700, including maintenance of land use controls.

**15. Comment:** Section 4.0, Site 3, Land-Use Controls and Long-Term Monitoring, 5<sup>th</sup> par.

The letter explaining the land use control violation at SWMU 3 has yet to be received by the Department. This letter must be submitted explaining in detail the communication failure, which resulted in the land use control violation. This letter must also state what changes are planned to prevent a reoccurrence of this type of incident. As stated in the EPA's comments, such planned changes must be detailed in this five-year review report as well.

**Response:** The revised Five Year Review will include the MCRD's 18 July 2005 letter, detailing policies and procedures, as an attachment. In addition, the following bulleted items, as identified in the 18 July 2005 USMC letter to SCDHEC, will be added to Section 9.0 and the Summary Form:

- MCRD will place signs along the causeway to more clearly identify the site restrictions: "No digging. Contact the Environmental Office at ext. 3423." The signs will be mounted on the utility poles, facing in both directions.
- MCRD will continue to develop the Geographic Information System (GIS). One planned upgrade is to provide Depot-wide access via the web browser. (Any advancement to the GIS is encumbered by issues related to the Navy Marine Corps Intranet (NMCI) which controls all of the hardware and software used throughout the Department of the Navy.)
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- MCRD will continue development of the environmental management system (EMS), providing another layer of visibility and reinforcement for the land use controls. More significantly, the EMS provides a system of auditing and management review. The audits will ensure that written procedures are both adequate and being complied with.

**16. Comment:** Section 4.0, Site 12

The selected cleanup goals for each site should be included in the five-year review as well as a brief discussion of any exceedances of such goals. Such information is crucial in evaluating the effectiveness of the remedy.

**Response:** The final paragraph in this section will be revised to the following: Since the ROD is not yet finalized, cleanup goals have not yet been confirmed. Since the remedial activity has not yet occurred, attainment of these goal can not be discussed yet. Since the remedial activity has not yet occurred, there are no deviations from design or O&M costs to date. All of these items will be discussed in the next Five Year Review Report.

**17. Comment:** Section 6.0, 3<sup>rd</sup> paragraph

This paragraph seems to imply that public comments were solicited via public notice. The Department is not aware of a public comment period. Perhaps this paragraph should clarify that the document was available to the public via the Freedom of Information Act.

**Response:** The TRC was advised, and provided handout material, at the 17 May meeting at MCRD Parris Island. The TRC was advised that they could request a copy of the in-progress document at any time through the anticipated completion date of 30 September. Based on this information, we do not propose to change the paragraph.

**18. Comment:** Section 6.0, Interviews

At a minimum, interviews should have been conducted with those personnel involved in the violation of the land use controls on SWMU 3. If this was done, please document the interview in this report.

**Response:** Interviews were not conducted. Until the second incident, no LUC deficiency had been identified, as the first incident appeared to be an isolated event. The second incident occurred after the 17 May 2005 site inspection. It was not apparent at the time of the site inspection that LUC might not be fully protective, and therefore no interviews were necessary. No revisions to the 5YR are necessary based on this response.

**19. Comment:** Section 7.0, Page 15, 3<sup>rd</sup> paragraph

The Department disagrees that the LUCs are functioning properly for SWMU 3. Please see comment # 3.

**Response:** Paragraph three already says that the LUC component of the remedy is functioning as intended with the exception of the two SWMU 3 lapses. As MCRD reports that the SWMU 3 excavation was entirely within the cover material, it is not apparent that any increased potential for human exposure exists now that the action is complete. Note that the risk for the construction worker contacting the consolidated waste materials below the cover was within EPA's acceptable risk target range of  $10^{-4}$  to  $10^{-6}$ . Since protectiveness is being maintained, the LUC are functioning except as noted. IC are being strengthened to prevent lapses of the types identified.

The following Protectiveness Statement from the supplemental EPA guidance will be used instead in Section 10:

The remedy is considered protective in the short-term; however in order for the remedy to be protective in the long-term, follow-up actions need to be taken. In order for the remedy to remain protective in the long-term, ICs that prevent future disturbance of the cap must be in place to prevent exposure to contaminants.

**20. Comment:** Section 7.0, Page 15, 6<sup>th</sup> paragraph

According to this paragraph the results of LUC inspections will be reported annually once the

remedies have been formally adopted. However, in the interim it should be stated how the results of these quarterly visual inspections and reviews will be transmitted to the Department and the EPA. Furthermore, any noted violations of the LUCs must be reported to the Department and the EPA immediately, rather than waiting until the annual report is to be submitted.

**Response:** The mechanism for information transfer of LUC inspections in the interim will be developed at the Team's regular Partnering Meetings. Nonetheless, violations of LUCs will be reported immediately.

**21. Comment:** Section 9.0

This report includes brief descriptions of Sites 12 and 45. The Department anticipates additional details regarding these and all other sites for which a remedy will be selected in the next five-year review report.

**Response:** Additional details regarding these and all other sites for which a remedy will have been selected will be provided in the next five year review.

**22. Comment:** Section 10

Please see comment #3.

**Response:** The following Protectiveness Statement from the supplemental EPA guidance will be used instead:

The remedy is considered protective in the short-term; however in order for the remedy to be protective in the long-term, follow-up actions need to be taken. In order for the remedy to remain protective in the long-term, ICs that prevent future disturbance of the cap must be in place to prevent exposure to contaminants.

Donald Hargrove Comments

1. **Comment:** Five-Year Review Summary Form, Page F-1: The Site name should be revised from "Parris Island Marine Corps Reserve Depot" to Parris Island Marine Corps Recruit Depot.

**Response:** Agree.

2. **Comment:** Site 12, Page 11, Third paragraph, third sentence: This sentence should be revised where it states "The RGOs are **substantially** the same as developed for Site 1 and Site 3." It is suggested that **substantially** be replaced with **essentially**.

**Response:** Agree.