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MCRD PARRIS ISLAND  
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT RECORD OF  
DECISION FOR SITE 12 JERICO ISLAND DISPOSAL AREA MCRD PARRIS ISLAND SC  
12/20/2005  
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

61 Forsyth Street, SW  
Atlanta, Georgia 30303

December 20, 2005

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Richard T. Tryon  
Commanding General  
Marine Corps Recruit Depot  
P.O. Box 5028  
Parris Island, SC 29905-9001

SUBJ: Draft Record of Decision (ROD) for Site 12/SWMU 10 – Jericho Island Disposal Area,  
Marine Corps Recruit Depot, Parris Island, South Carolina (OU5)

Dear General Tryon:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the above subject document and offers the following comments for your response.

**General Comments:**

1. **General.** The Declaration does not state that after the remedy has been implemented, the risk at the site is appropriate for unrestricted use. Please so state, if appropriate (see statement to that effect in Section 2.8.4). If, on the other hand, the risks to humans or the environment do not allow for unrestricted use or unlimited exposure, then it appears to be appropriate to select Land Use Controls (LUCs) as part of the remedy. In addition, under that same assumption, a five-year review would be mandated by CERCLA Section 121(c). And therefore, language changes throughout the document would be necessary where statements are made regarding unrestricted use, re-use, and five year review requirements. See the following comment and please clarify.
2. **General.** There appears to be little discussion of whether there is a need to address the risk posed by exposure to groundwater, though Section 2.6 discusses unacceptable risks from such exposure. Section 1.4 states that existing monitoring wells will be properly abandoned. Section 2.4 and Section 2.7.1 states

that groundwater will be "indirectly" addressed through actions taken to address waste, soil, and sediment, but includes limited discussion of how this will be accomplished. Taking even this indirect action underscores the question of whether exposure to groundwater at the site poses an unacceptable risk to human health and the environment; whether a remedial action to address these risks is necessary, including LUCs; and whether it is appropriate to abandon all existing monitoring wells, as stated in Section 1.4. Please clarify. Also see Comment 13, especially the NCP references to use for your explanation.

### Specific Comments:

3. Section 1.1. This comment also applies to Section 2.1. The Superfund site identification number is only four digits (i.e. 04NY). Please delete all remaining digits or explain their purpose.
4. Section 1.2. This section should state that the Navy and EPA select the remedy, with concurrence by SC.
5. Section 1.2. Although this section is written in accordance with the EPA guidance "*A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*", it is not stated that the Resource and Conservation Recovery Act (RCRA), as amended was also used to determine the selected remedy. Since the Marine Corps Recruit Depot (MCRD) Parris Island installation and restoration (IR) activities are conducted under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (as reported) and RCRA programs, this fact should be reflected in the text in this section.
6. Section 1.3. The fourth paragraph states "Under other human health exposure scenarios, ILCRs and HIs were within or less than acceptable ranges". The sentence phrase "less than acceptable ranges" may be interpreted as being not acceptable, when in fact, under other human health scenarios, the ILCR and HI levels are acceptable. Please re-phrase the sentence.
7. Section 1.4. Please note: These comments also apply to Section 2.10, even though those paragraphs are not bulleted.

First bullet - Since two polyaromatic hydrocarbon (PAH) contaminated soil and one inorganic-contaminated sediment areas are discussed in this section, a figure depicting these areas should be included in this section. Figure 1-2 does not depict these areas, however, Figure 2-4 does.

Second bullet - After "achieved" change the language to read, "the Clean-up Goals (CGs) which are set at the Remedial Goal Option (RGO) levels identified in Tables 2-11 and 2-12." Then fix the rest to be the next sentence or delete it.

The fourth bullet in this section states "Prior to loading and transport, excavated sediment and wet surface debris will be dewatered". Please provide a brief discussion of the proposed dewatering activities in this section of the ROD.

In the fifth bullet, between the 3<sup>rd</sup> and 4<sup>th</sup> sentences, add the following, "The causeway area will be reestablished as a salt marsh.", as was stated in the Proposed Plan.

Begin the next sentence in the fifth bullet with "After approval from EPA and DHEC,"

The last sentence in the fifth bullet of this section, states "Also, if verification sampling indicates that residual sediment contamination remains, additional excavation and/or covering with soils may be considered to provide a barrier to reduce contact with contaminated sediment". Covering with soils would only be allowed if the RGOs have been met, but MCRD desires to further reduce contact. It should be noted that the action of covering any residual sediment contamination with a soil cover to reduce contact with contaminated sediment which has not reached the RGOs is essentially restricting the exposure rather than achieving unrestricted use. This in effect limits the allowable protective land use. Land Use Controls (LUCs) would be a required component to the remedy if the land use is limited and exposure restricted. The ROD should be revised as appropriate to address this issue. We recommend taking out the words "and/or covering with soils".

(Reminder: Be sure to make these changes to Section 2.10 as well.)

8. Section 1.5: Add the word "effectively" to the first and second bullets, before "eliminated". Do the same in Section 2.4, par's 4 and 5; Section 2.8.4 ARARs par 3; Section 2.10, par 1; Section 2.11, bullets 1 and 2; and anywhere else appropriate.
9. Section 1.6.

It appears that the table reference provided in the first bullet is incorrect. The correct table reference is likely "(Tables 2-1 through 2-7)". Please revise as necessary.

It appears the table references provided in the second bullet are incorrect. The correct table references are likely (Tables 2-8) and (Table 2-10). Please revise as necessary.

In the third bullet please add "(Table 2-11 and 2-12)" after COCs and delete "(Table 2-9)" at the end.

In the fourth bullet, after "Section 2.7" add "and Table 2-9".

In the seventh bullet, after "Section 2.5.3" add ", Section 2.8.4,"...

In the eighth bullet, change "C" to "B".

In the ninth bullet after "Sections" add "2.10 and".

10. Section 1.7. The current Division Director is in an acting capacity for a limited duration. Before this ROD is submitted in its final form, please check back with us to confirm the signature line. The signature line as of today should read:

Beverly H. Banister  
Acting Division Director  
Waste Management Division  
U.S. EPA Region 4

11. Section 2.1. This section should state that the Navy and EPA select the remedy, with concurrence by SC.
12. Section 2.2. The text indicates that Figure 1-1 demonstrates how the runway is aligned. It does not appear to be demonstrated on Figure 1-1. Please clarify by labeling the runway on the Figure.
13. Section 2.4. This section indicates that the scope of the response action includes groundwater but does not do an adequate job of defining why no remedial action is necessary for the groundwater. This section states that it is unlikely that humans will drink Site 12 groundwater due to its high salt content. Though this information is important to the cleanup decision, it does not go far enough in justifying, per the NCP, why no action is necessary.

Here is a road map using the Preamble to the NCP:

- Identify the groundwater as a Class I, II or III. Class III groundwaters are not considered to be potential sources of drinking water and are of limited beneficial use. These are ground waters which are highly saline... Class III groundwaters are also described as waters that are unsuitable for human consumption due to high salinity or widespread contamination and [do] not have the potential to affect drinkable ground water... 53 Fed Reg 51433.
- If found to be a Class III groundwater, then drinking water standards are neither applicable nor relevant and appropriate. NCP Preamble, 53 Fed Reg 51434. Bear in mind, that doesn't mean that you don't take some kind of remedial action; it just means that ARARs don't apply when you do take an action.
- Remedial alternatives should focus on whether there is any beneficial use or on preventing adverse spread of the contamination. In addition, environmental

receptors and systems may well determine the necessity and extent of groundwater remediation. 53 Fed Reg 51434.

Please use these excerpts from the NCP to provide an analysis for why no remedial action is necessary for the groundwater at Site 12. Section 2.5.2.1 contains information that may be helpful to your explanation.

14. Section 2.6, Par's 6 and 7. Please clarify which "such" "human health criteria" were exceeded (e.g. screening, risk range, etc.)
15. Section 2.7.1. The seventh paragraph states "Under other exposure scenarios, cancer and non-cancer risks were within or less than acceptable ranges" is misleading as written. The phrase "less than acceptable ranges" may be interpreted as being less than acceptable, or not acceptable, when in fact they are acceptable. Please re-phrase the sentence.
16. Section 2.8.2. Please include an underline heading for Modified Alternative 4, as has been done for the other alternatives. Especially since this is the Selected Remedy, it should be easy to locate in the document.
17. Section 2.8.2. Alternatives 2A, 2B and 3 all utilize land use controls and long-term monitoring of the groundwater. Please clarify why land use controls and long-term monitoring of the groundwater are required by neither Alternative 4 and Modified Alternative 4.
18. Section 2.8.3. This section states, appropriately, that all remedial actions must meet ARARs unless waived. This ROD does not explain that ARARs for groundwater may not apply, though the risk from exposure to groundwater has exceeded the Arisk range@ of  $10^{-4}$  to  $10^{-6}$ . Please clarify based on your responses to Comment 13 above.
19. Section 2.8.4. Please see previous comment regarding ARARs and clarify whether ARARs have been identified for groundwater and how the alternatives propose to address them, or whether it has been determined, per CERCLA 121(d) that ARARs do not apply or may not be appropriate, even if applicable or relevant. (See comments 13 and 18.)
20. Section 2.8.4. This section states that both Alternative 4 and Modified Alternative 4 allow for unrestricted use of the site. Please clarify whether Aunrestricted use@ is intended to mean that the groundwater is safe for consumption by residents or other users.
21. Section 2.8.4. Please clarify how both Alternative 4 and Modified Alternative 4 comply with ARARs. (See comment 13, 18 and 19).
22. Section 2.10. Please address the monitoring and establishment of success criteria for restored areas of the 1.6 acres of wetland impacted by the cleanup.
23. Section 2.10. Please clarify what is meant by AAlternatives for the salt marsh restoration may be considered that would be enacted based on inadequate vegetative establishment or reestablishment of soil conditions.@ Clarify that any

such alternatives must be approved by EPA and DHEC.

24. Section 2.10 and 2.11. Please revisit earlier comments regarding groundwater, unrestricted use and ARARs, and address, as necessary, in these sections.
25. The ROD should document that the remedy has already been implemented and that while there was a delay in finalizing this document, the decision was made to proceed with a remedial action workplan and implementation of the remedial action due to funding issues and timing issues related to the planting season for revegetation efforts. This text could be included in the Declaration, Section 2.2 and Section 2.10.
26. Table 2-11. Indicate the specific EPA guidance referenced in the table footnote No. 8 which states that "RGO is PRG + Background per U.S EPA Guidance".
27. Section 2.12. This section may need updating based on responses to earlier comments, if such responses indicate anything significantly different from the Proposed Plan.
28. Responsiveness Summary: The final bulleted response may or may not need to change depending on responses to earlier comments.

If you have any questions regarding these comments, please feel free to contact me at (404) 562-9969.

Sincerely,

Lila Llamas  
Senior Remedial Project Manager  
Federal Facilities Branch  
Waste Management Division

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