

M00263.AR.000503
MCRD PARRIS ISLAND
5090.3a

LETTER OF TRANSMITTAL AND U S EPA REGION IV COMMENTS ON DRAFT PROPOSED
PLAN FOR A FINAL REMEDY AT SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC
9/25/2007
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER

61 FORSYTH STREET, S.W.

ATLANTA, GEORGIA 30303

September 25, 2007

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

4SD-FFB

Commander, Southern Division
Naval Facilities Engineering Command Southeast
Attn: Mr. Charles Cook
Building 135
Naval Air Station
Jacksonville, FL. 32212

And

Commanding General
Marine Corps Recruit Depot
Attn: Dr. Heber Pittman, NREAO
P.O. Box 5028
Parris Island, SC 29905-0028

SUBJ: EPA Review of the OU3 Draft Proposed Plan for a Final Remedy – MCRD, Parris Island, S.C.

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) Region 4 has completed review of the subject document. This document has been reviewed for compliance with CERCLA and the EPA guidance on decision documents. As agreed to on the Tier I Team conference call regarding this Proposed Plan (PP or the Plan), EPA is submitting only generalized comments which will help to redirect the Navy/MCRD to revise/reorganize the Plan to better meet EPA's decision document guidance and to better align with the actions actually being proposed (see attached). EPA understands that the Navy/MCRD will submit a D1 rev 2 of the Plan for review and comment. At that time EPA will comment on specific language changes if needed. In general, when revising this draft, please keep in mind that information required to be included in the PP to support the adoption of the interim remedial action as final, implementation of the LUCs, and continued ground water monitoring, are based on different site areas (within the cover .vs. outside the cover), as well as data sets and timeframes (pre-remedial .vs. post-remedial), than the No Action for Sediments determination. Since a D1 rev 2 will be submitted for review and comment, EPA would not expect or require extensive responses to most of these comments, nor is it necessary to include exact revised language for our consideration. Please call with any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script that reads "Lila Llamas".

Lila Llamas, RPM
Federal Facilities Branch
Superfund Division

cc: Meredith Amick, SCDHEC
Jo Bower, SCDHEC
Mark Sladic, TTNus ✓

*EPA Comments on the Draft Proposed Plan for Site/SWMU 3 at
MCRD Parris Island, SC*

General Comments

1. Overall most of the content in this Proposed Plan is useful and provides information required by the NCP. However, there are some areas that are not entirely consistent with the EPA *Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Documents* [OSWER 9200.1-23P, July 1999](hereinafter referred to as the *Decision Document Guide*) format for a Proposed Plan. For example, there should be a *Preferred Alternative* (or *Preferred Final Remedy*) Section that describes the components of the final action, how it will achieve the RAOs, as well as how it addresses principal threat wastes.
2. As discussed during teleconferences and explained in e-mail messages, the EPA believes that the proposed Final Remedy for Site 3 is slightly different than what the Navy has presented in the draft Proposed Plan with respect to "No Further Action" components. The EPA agrees the Interim Remedial Action (IRA) was the best alternative for Site 3 and the final action essentially adopts the IRA as the Final Action along with some additional/modified components. In addition, since the IROD deferred the sediments outside the immediate Site 3 area (and perhaps the surface water – see below) to the Final Action, the EPA believes it is appropriate to include a decision on the sediments in the same CERCLA ROD. Essentially, this Proposed Plan is presenting two distinct decisions: 1) Final Action for Site 3; and 2) No Action for sediments deferred by the IROD.

The EPA suggests that the proposed final remedy consists of the following components.

- Adoption of the Interim Remedial Action (IRA) as the Final Action with the addition of maintenance of the landfill cover;
 - Implementation of the land use controls (LUCs) and annual site inspections;
 - Monitoring (annual) of groundwater to continue assessing the contaminant levels in surface water recharge to ensure remedy remains protective.; and
 - No Action for the sediments located outside the capped area based upon the determination that there is not an unacceptable risk to human health or the environment from the residual contamination (no action necessary for protection);
3. The Proposed Plan includes a proposal to cease collection of samples from wells around this site. At this time, EPA disagrees with this proposal.

There are currently four monitoring wells around Site 3 – Causeway Landfill, including PAI-03-MW-01SR, PAI-03-MW-02DR, PAI-03-MW-03SR, and PAI-03-MW-04SR. Samples have been collected annually, except in 2005, from these wells over the last five years, per a 2001 Interim Record of Decision. While analytical results from wells MW-02DR, MW-03SR, and MW-04SR since 2001 have been unremarkable with respect to drinking water standards, the results from well MW-01SR have indicated noteworthy levels of contamination. Specifically, samples collected from MW-01SR have consistently indicated concentrations of benzene ranging from 42.6 parts per billion (ppb) to 146 ppb. Likewise, chlorobenzene concentrations have consistently ranged from 800 ppb in a diluted sample to 1260 ppb. These data indicate an increase from the pre-remedial levels. The most recent groundwater monitoring data was presented in draft

*EPA Comments on the Draft Proposed Plan for Site/SWMU 3 at
MCRD Parris Island, SC*

form and had not been compared to any relevant value with respect to surface water for potential ecological concerns.

Based on the RI, the ground water appears to be non-potable due to high salinity and excessive Total Dissolved Solids (TDS). The RI indicates that recharge of contaminated groundwater to the surface water and/or sediments is "not significant", but this appears to be based on the lack of ground water COCs being in the surface water samples taken, as opposed to any specific zone of influence being identified and studied. Alternatively, the presence of elevated contaminant levels in general could be an indicator as to whether or not the remedy is effective and protective, with respect to the IROD Remedial Action Objectives (RAOs), most specifically to "Eliminate the migration of COCs from the fill material to sediment, surface water, and groundwater."

Due to the increased levels of some hazardous constituents in samples collected from wells around Site 3, monitoring should continue. It is acceptable to EPA to continue annual collection of samples from these wells. However, criteria which measure effectiveness and protectiveness of the remedy need to be established. EPA would suggest a criterion such as "stabilized or decreasing trends in contaminants." If after five more years of continued monitoring it is confirmed that the selected remedy remains protective of human health and the environment as compared to the established criteria, then, EPA would be willing to consider a proposal to reduce, or potentially eliminate, further monitoring at that time.

Recommended pathforward: Criteria need to be discussed and established by the team. Then based on the agreed to criteria, a discussion should be held as to whether or not monitoring needs to be continued. If monitoring is to be continued, revise the Proposed Plan as directed in these comments, but the exit strategy and other details could be finalized in the ROD. And if monitoring is not to be continued, the data and information used to make this decision needs to be discussed in the PP to support discontinuing monitoring. Either way, the Proposed Plan should be revised accordingly.

4. Statements in the Site 3 Remedial Investigation Report (RI) and the Site 3 Interim ROD (IROD) appear to be in conflict with each other. The RI states, "Because of the transient nature of surface water, water quality concerns would be better addressed through management of sediment and soil. As such, surface water does not need to be considered directly in a FS/CMS." The IROD states, "Surface water at this site has been slightly impacted by site contaminants. The proposed interim remedy will prevent future migration of contaminants from the soils and wastes to the surface water. The surface water of Site 3 will be further addressed with the remaining contaminated sediments." EPA understands here that the "remaining" sediments are those sampled after the interim action was taken. The RI appears to indicate that no action is needed for surface water. The IROD appears to indicate that the surface water will be addressed in the final ROD. It is not clear, based on these statements, and the lack of specific statements in the RI conclusions regarding surface water risk levels and the need or lack of need to remediate, as to whether or not there is an unacceptable risk in surface water that needs remediation. Please clarify. Based on the response to this comment, an additional component regarding surface water may be needed, in order to either take an action or support no action. If one is needed either way, the component would need to be added to the list of

**EPA Comments on the Draft Proposed Plan for Site/SWMU 3 at
MCRD Parris Island, SC**

bulleted components in General Comment #2 above and all comments referencing back to General Comment #2 would also be referencing this additional component. Additionally, your response here needs to correlate with EPA comments pertaining to surface water related LUCs (see Specific Comments.)

Specific Comments

1. **Final Remedy Proposal Summary text box, Page 2** – Change the bulleted components consistent with the bullets provided above in General Comment 2.
2. **Scope and Role of this Proposed Action, Page 4** – Change the title of this Section to *Scope and Role of the Action* and indicate that Site 3 is OU3. Also, please add some language that describes that there is an FFA signed by all three parties that governs the administration of the CERCLA remedial investigation/remedial action process at MCRD.
3. **Scope and Role of this Proposed Action, Page 5** – The bulleted components of the proposed final remedy should be located in the *Preferred Alternative* (or *Preferred Final Remedy*) Section. Accordingly, 'cut and paste' these bullets and revise to make consistent with the EPA description in General Comment #2. In addition, the paragraph explaining the LUC implementation strategy should be relocated into the *Preferred Alternative* Section.
4. **Summary of Site Risks, Page 5** – The information provided in this portion of the document needs to summarize the residual risks at the site post-IRA (which is essentially the same as pre-IRA, except now they are covered, and is the driver for the LUCs), as well as document that there is not an unacceptable risk for the sediments in the areas deferred by the IRA. See Chapter 3.3.5 of the EPA's Decision Document Guide for the types of key information that should be included in this Section of the Proposed Plan. Basically, the Navy needs to summarize the results of the earlier Baseline Risk Assessment(s), and the land- and groundwater- use assumptions used in the analysis. Specifically, there should be language referencing data that indicates the status of the groundwater (surficial aquifer) as non-potable due to high TDS/salinity. This Proposed Plan must include a summary of the groundwater data from the IRA RI/FS, and perhaps data gathered in the 5 years post-IRA, to support this determination of groundwater as non-potable. In addition, there should be reference to the most recent sediment data and risk determination, made by the Navy/MCRD and approved by the regulators, that there are no site risks with respect to the contaminated sediments. [See Comment #7 below]
5. **Summary of Site Risks, Page 5** – The subsections under this Section should be indented and/or italicized to highlight that they are indeed subsections of this Section. In order to better distinguish the No Action for sediments from the site risks that remain at Site 3 (and require LUCs) consider separating any discussion of the sediment sampling and analysis into its own subsection.

**EPA Comments on the Draft Proposed Plan for Site/SWMU 3 at
MCRD Parris Island, SC**

6. **Summary of Site Risks, Page 5** – This Section should include the standard language explaining the basis for taking final action with respect to Site 3 (excluding the sediments). [Reference *Decision Document Guide* Highlight 3-2 on Page 3-4]
7. **Sediment Sampling and Analysis Performed outside Sediment Area 4, Page 6** – This subsection should be re-titled as *Sediments* and present the basis for the No Action decision based upon the data/characterization gathered to date. Consider adding a text box that chronologically lists and summarizes the sampling events and results along with any documentation to support the No Action determination. In particular, the EPA suggests the Navy reissue the Post-Construction Risk Assessment document, and include as an addendum or appendix the EPA Data Summary Report, for the sediments with conclusions and recommendation for No Action for EPA and SCDHEC approval. This document, or something very similar, must be approved before issuance of the Final ROD so as to be included in the Administrative Record. The Risk Assessment (even if still a Draft document), along with any other documents/reports that support the No Action decision (e.g. EPA's Data Summary Report), should be listed in the References Section of the Proposed Plan. Additionally, if the "Oversight Field Record Report" referenced here is the same as the EPA Data Summary report, delete the associated sentence. The EPA report did not make conclusions or recommendations. Otherwise, please provide the Oversight document you are referencing.
8. **Remedial Action Objectives, Page 7** – There are residual risks at the site from the buried wastes and thus LUCs are required for the final remedy to remain protective. However, it is unclear to EPA whether risks remain in the surface water to warrant the use restrictions identified in the IROD LUCIP such as no swimming/wading within 200ft. of the causeway, no subsistence fishing, etc. Consequently, the *Remedial Action Objectives* Section should at a minimum include the LUC Performance Objectives that are relevant given current site conditions. These LUC Objectives should be the same that would be included in the LUC Remedial Design, not necessarily those presented in the IROD. Also, include an RAO that addresses the need for continued groundwater monitoring.

Additionally, assuming the surface water related LUCs are to be implemented herein, explain how MCRD will enforce the prohibition of subsistence fishing while allowing recreational fishing. If Base limits are to be utilized, relate the Base limits to the risk assessment approach utilized in the RI. Secondly, on the associated LUC Figure, please clarify the LUC boundaries vs. Site boundaries, and explain how they were placed.
9. **Preferred Final Remedy, Page 7** – As stated above, this Section should be included in the Proposed Plan with an explanation why other remedial alternatives were not considered necessary. Namely, the IRA was the best choice to contain the buried waste and continues to be the best remedy considering the addition of the maintenance component, along with continued LUCs and groundwater monitoring to protect human health and the environment. In addition, there should be fairly detailed description for each of the remedy components that are summarized in the bullets provided in General Comment #2 above.
10. **Preferred Final Remedy, Page 7** – Please add this paragraph to the end of this Section:
"Since hazardous substances will remain at the site above levels that allow for unlimited

***EPA Comments on the Draft Proposed Plan for Site/SWMU 3 at
MCRD Parris Island, SC***

exposure and unrestricted use, the Navy will review the final remedial action no less than every five (5) years per CERCLA Section 121(c) and the NCP at 40 CFR300.4309f(4)(ii). If results of the five-year reviews reveal that remedy integrity is compromised and protection of human health is insufficient, then the additional remedial actions would be evaluated by the parties and implemented by the Navy.”

11. ***Community Participation, Page 17*** – Consider relocating this Section to before the Figures. Please add the following paragraph as an introduction: “State concurrence with the Preferred Final Remedy was obtained through the review and approval of documents in the Administrative Record file. Community acceptance will be determined through the publication of this Proposed Plan and solicitation of their input on the Preferred Final Remedy during public comment period. During the public comment period, the Navy, EPA and SCDHEC welcome comments and/or suggestions on the Preferred Final Remedy.” Then refine the statements on Page 2 of the Proposed Plan pertaining to soliciting or not soliciting public comment based on the changes to this Plan and as appropriate.