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MCRD PARRIS ISLAND  
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON U S NAVY RESPONSE TO  
COMMENTS ON PROPOSED PLAN DRAFT 1 REVISION 1 FOR SITE 3 CAUSEWAY  
LANDFILL WITH ATTACHMENTS MCRD PARRIS ISLAND SC  
10/24/2007  
U S EPA REGION IV

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**Subject:** Re: MCRD PI Site 3 Proposed Plan D1, rev 1  
**Date:** Wednesday, October 24, 2007 10:51:36 AM  
**Attachments:** [SCDHEC pre-D1\\_rvw comments RTC.doc](#)  
**Importance:** High

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Hi folks,

For clarification on the RTC, I do think the Navy/MCRD should issue an RTC and include it in the administrative record. However, what I meant with not needing much response was that most of the comments were general about a rewrite of chunks of text. So for those comments, you could just respond "acknowledged" (provided you agree in general with the comment suggestion) as opposed to providing exact text to be inserted in the revision, like you usually do. That would be too extensive and confusing since the new text may not be in the same place as the referenced comment text, etc. However, there were three or so comments (some could be combined in a single response) which were substantive for discussion type responses. As I look back at the comments, I would group them as follows:

"Acknowledged" type comments = General #s 1 and 2, Specific #s 1, 2, 3, 5, 6, 9, 10, 11.

Response needed comments = General 3, General 4/Specific 8, and Sepcific 4/7.

For these response needed comments, given that you have done the rewrite, if the rewrite specifically answers the comments, then maybe provide a summary statement response and reference the rewritten text paragraphs. If the comment was discussed and you all decided how you would proceed, but the rewrite maybe only minimally answers the comment (just because the majority of the response was not really appropriate for actual PP text), then a full response would be appreciated. It is important to understand where the Navy/MCRD is on these subjects, not only for review of this draft, but also for a path forward agreement.

Hope this is clear now. If you still have questions, please let me know.

Thanks,  
Lila

-----"Sladic, Mark" <Mark.Sladic@tetrattech.com> wrote: -----

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Subject: MCRD PI Site 3 Proposed Plan D1, rev 1

Hi everyone -please see attached subject document, in PDF. In addition, please see RTC for SCDHEC comments. I may have been reading EPA's review comments cover letter too literally, but since the letter said 'EPA would not expect or require extensive responses to most of these comments', I didn't prepare an RTC for EPA. However, I still can rough something out if it provides any value. Please advise.

In line with how the Team has indicated it desires to receive deliverables, I will be sending hard copy to Meredith today. thanks.

**Mark Sladic, P.E. | Project Manager**

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## ENGINEERING COMMENTS

Prepared by Meredith Amick – South Carolina Department of Health and Environmental Control  
Marine Corps Recruit Depot (MCRD)  
September 24, 2007

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### General Comments

1. **Comment:** It is the Department's understanding that the team has discussed the following information; however, it has not been submitted formally. Prior to further review of the Proposed Plan for SWMU 3, the Department must receive and approve the information to support the following statement (Page 4 First Column Last Paragraph), "In April thru August of 2003, a supplemental investigation was performed to further investigate sediments with elevated pesticide concentrations. The supplemental investigation determined that pesticide and metal concentrations had decreased to concentrations that did not result in an unacceptable human health or ecologic risk."

**Response:** The supplemental investigation was the EPA initiated sediment sampling. The sampling results were provided to the Team by EPA, but were never submitted formally by any party. Follow-up discussion during partnering meetings, as noted in meeting minutes, indicated that since SCDNR was satisfied with the sampling results, that SCDHEC could support these also. Those meeting minutes were previously resent to SCDHEC. Navy acknowledges that different personnel represented the State on the Team at that time. The Team is still determining how Navy might formally submit EPA sampling results, as Navy is not in possession of the backup files or any additional information beyond that also at SCDHEC.

2. **Comment:** The breach of cover that occurred during December 2006 should be discussed in the Site Background Section.

**Response:** The following sentence has been added at the end of the subject discussion: A third similar breach occurred in 2006 due to horizontal drilling to place a fiber optic junction box.

### Specific Comments

1. **Comment: Summary of Site Risks Bullet #1**  
Please discuss if "areas that have not been significantly affected by human activities" are located on any SWMUs/AOCs.

**Response:** The final sentence in the bullet item has been updated: These concentrations are the results of chemical testing performed on samples collected in areas that have not been significantly affected by human activities and are not located on any SWMUs/AOCs.

2. **Comment: LUC Map**  
To clarify that the Site Boundary includes the 200 ft no access area, please define the site boundary in the document.

Prohibition #5:

Please clarify whether the site boundary line is located 200 ft from the toe of the landfill boundary or from the centerline. Note the Department feels that the site boundary line should be measured from the toe of the landfill as this is where the landfill debris ends.

The site boundary line should extend past Area 1 Sediment Cover.

Please clarify if prohibition #3 applies to the creeks/ponds SW of the site.

**Response:** At present, the site boundary is shown as an area 200 feet from the centerline of the landfill. At this time Navy/MCRD does not disagree with SCDHEC's statement that the site boundary should be measured from the toe of the landfill, however, Navy/MCRD have not yet determined how to enforce or mark a boundary that tracks an underwater (invisible from the surface) feature. Navy/MCRD is prepared to work with the entire Partnering Team to determine an implementable, enforceable site/LUC boundary.

Prohibition #3 (no swimming or wading) only applies to the ponds east of the causeway in order to protect the fabric and riprap sediment cover.

## HYDROGEOLOGY COMMENTS

Prepared by Joe Bowers – South Carolina Department of Health and Environmental Control  
Marine Corps Recruit Depot (MCRD)

September 24, 2007

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### 1. **Comment: General Comment**

The Marine Corps Recruit Depot (MCRD) includes in its Proposed Plan for Final Remedy at Site/SWMU 3 – Causeway Landfill a proposal to cease collection of samples from wells around this site. The Department disagrees with this proposal.

**Response:** The revised D1 Proposed Plan no longer includes the proposal to cease collection of samples from groundwater monitoring wells around this site.