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MCRD PARRIS ISLAND
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON RISK DATA FOR TECHNICAL
MEMORANDUM FOR SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC
12/16/2008
U S EPA REGION IV

From: Koroma-Llamas.Lila@epamail.epa.gov
To: Cook, Charles CIV NAVFAC SE; timothy.j.harrington@usmc.mil
Cc: charles.cook2@navy.mil; koroma-llamas.lila@epa.gov; Sladic, Mark; timothy.j.harrington@usmc.mil; mmcrae@TechLawInc.com; AmickMS@dhec.sc.gov; darrel.pittman@usmc.mil; Kelly.Taylor2@ch2m.com; streetjs@dhec.sc.gov; Frederick.Tim@epa.gov
Subject: Re: Risk data from site 3 PARRIS ISLAND
Date: Tuesday, December 16, 2008 6:31:12 PM
Attachments: [ole1.bmp](#)
[site 3 risk data.pdf](#)
Importance: High

Mr. Charles Cook and Mr. Tim Harrington,

Since the attached Navy letter did not request a response in writing, but rather an opportunity to discuss, I spoke with Charles about the subject issue. I am now capturing the main points from that discussion in this email:

As discussed on the phone in response to your letter :

As for rounding issues, normal rounding rules apply in the HI calculations. However, feel free to email Mr. Tim Frederick of EPA regarding specifics on this subject if you need further clarification while I am out for the holidays. Tim can be reached at frederick.tim@epa.gov.

Based upon what we know, the civilian receptor eats a lot of fish and shrimp from the pond. My best guess, based upon the information presented below and Mr. Harrington's interpretation of interview results, is that the "real" answer is likely to be somewhere unknowable between 350 and 500 or more. The 500 meals does not appear to be unreasonable based on what we know about the lady (eats a lot of fish - "mostly" from Site 3, fishes other places besides Site 3, eats lots of shrimp so maybe a replacement for a fish meal, etc.), but may be high or low in reality. We don't have any real way of knowing whether either number is better than the other or is equally wrong. Therefore, my risk assessor's recommendation is to use the two estimates together to create a range of potential risk that can be considered by the risk managers.

Then ensure that you address where you got the range from and all the other issues within the uncertainty section in the tech memo.

EPA stands by the previously stated position with respect to fish tissue sampling as follows: Fish tissue sampling will not be required by EPA if a determination is made that there is no unacceptable risk shown in the risk assessment and therefore no fishing restriction LUCs will be required in the ROD. If a determination is made that fishing restriction LUCs are required, EPA would require fish tissue samples in support of development of the LUC Remedial Design document, in order to set the level of restriction. If fish tissue sampling data results are determined to be sufficient to indicate no fish restrictions are needed, then an ESD can be processed at that time to remove the LUC fishing requirements from the ROD.

Since I believe SCDHEC said they would not state a position on the need for fish tissue sampling until the revised tech memo is submitted for approval, I suggest you submit the tech memo immediately, as we discussed, especially since the document was past due as of November 7th, 2008, in accordance with EPA's extension request approval letter of

November 3rd, 2008.

Call me with any further questions.

Thanks,

Lila

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12/09/2008 04:55 PM
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Subject
Risk data from site 3 PARRIS
ISLAND

<<site 3 risk data.pdf>>

Picture (Enhanced Metafile)

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(See attached file: ole1.bmp)(See attached file: site 3 risk data.pdf)