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MCRD PARRIS ISLAND  
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LETTER OF TRANSMITTAL AND SOUTH CAROLINA DEPARTMENT OF HEALTH AND  
ENVIRONMENTAL CONTROL COMMENTS ON FIVE YEAR REVIEW REPORT MCRD  
PARRIS ISLAND SC (PUBLIC DOCUMENT)

5/25/2010

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL



C. Earl Hunter, Commissioner

*Promoting and protecting the health of the public and the environment.*

May 25, 2010

Commanding Officer  
NAVFAC Southeast  
ATTN: Mr. Charles Cook  
PO Box 30  
Ajax Street North, Bldg 135  
Jacksonville, Florida 32212

RE: Comments to the Five Year Review  
Marine Corp Recruit Depot (MCRD)  
Parris Island  
SC6 170 022 762

Dear Mr. Cook:

The Division of Waste Management of the South Carolina Department of Health and Environmental Control (Department) completed the review of the *Five Year Review* received March 22, 2010. Based on this review the Department provides the following comments.

The Department's comments are based on the information presented by MCRD to date; any information found to be contradictory may result in additional comments or require further action. If you have any questions regarding this issue, please contact me at (803) 896-4218.

Sincerely,

Meredith Amick, Environmental Engineer Associate  
Corrective Action Engineering Section  
Division of Waste Management

cc:

Tim Harrington, MCRD Parris Island  
Annie Gerry, Hydrogeology  
Priscilla Wendt, SCDNR  
Russell Berry, EQC Region 8, Beaufort

Lila Llamas, EPA Region 4  
Tom Dillon, NOAA (via email)  
Mark Sladic, TtNUS  
Heber Pittman, MCRD Parris Island

ENGINEERING COMMENTS  
Prepared by Meredith Amick  
Marine Corps Recruit Depot (MCRD)  
May 14, 2010

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**General Comments**

1. Section 4 Remedial Actions for each site should clearly state each Land Use Control objective under "Land Use Controls and Long-Term Monitoring."
2. Section 7 please state whether each portion of the remedy for each site will be continued (i.e. groundwater monitoring, sediment monitoring, LUCs, etc).
3. Some headers read Rev 0 June 2005, please correct the date of issuance.
4. Some headers read Rev1 September 2005, please correct the revision number and date of issuance.

**Specific Comments**

1. Section 1 Page 2 Paragraph 2

"Specific details for each site are provided in this document..." This is not true, as only some of the sites are discussed in this document. Please correct the discrepancy.

2. Section 1.0 First sentence

This sentence states that the Five Year Review is for the "remedial actions implemented at Site/SWMU 3;" however, the next paragraph states that the document is for several sites. Please correct the discrepancy.

3. Section 1 Page 2

The effective date of the FFA is the date of the last signature on the FFA which is January 2005. Please correct the discrepancy.

4. Section 1 Paragraph Five

This paragraph states that, "Subsequent reviews are triggered by the date of EPA's concurrence signature date..." Please note this should be "the date of EPA and DHEC's...".

5. Section 3 Page 4 First Paragraph

This section states, "The projected land use is substantially the same as historic land use (see Figure 1)." Figure 1 is not adequate to show land use. A map should be provided that shows this information.

6. Section 4 Page 9 First Paragraph

The Department does not understand the statement, "The prohibition of the specific actions identified in the LUCIP is enforced; however the reporting requirement of the LUCIP has not been implemented." Please clarify.

7. Section 4 Page 9 Second Paragraph

This section states, "The Partnering Team is currently reviewing the revised Long Term Monitoring Work Plan for Site 1." The Department believes this document has already been approved. Please clarify.

8. Page 10 Last Paragraph

Please replace the following sentence, "Signage was placed at the site to preclude future human ingestion of fin fish and shellfish harvested from the pond adjacent to the site." with "Signage was placed at the site that read, 'No subsistence fishing'."

9. Page 10 Last Paragraph

The Department questions if the following statement is accurate, "The annual reporting requirement set forth in the LUCIP has yet to be implemented but will be effective immediately." Please clarify. Additionally for Sites 1, 3, and 12, annual LUC checklists should be completed and submitted to the regulatory agencies, beginning immediately, if not already initiated.

10. Page 11 First Paragraph

The Department does not believe that it is accurate that "The Navy/Marines are currently reviewing the draft Proposed Plan for Site 3..." It should be mentioned that the Proposed Plan revision is awaiting approval of the Site 3 Tech Memo which will include Fish Tissue Sampling results.

11. Section 4 Page 13 Site 12

The discussion of Site 12 does not mention annual Land Use Control reporting. This should be mentioned in the Five Year review as well as reports should be submitted annually to ensure that the LUC portion of the remedy remains effective.

12. Section 5 Page 14

The Department cannot yet agree that, "the risk driver for human health risks from fish consumption were potentially due to background concentrations (anthropogenic) of PCBs..." as the Final Tech Memo has not been issued or approved. This statement should be removed.

13. Section 6 Page 15

The second paragraph states, "The draft Five Year Review Report was provided to US EPA and SCDHEC for review and comment on 20 March 2010. This document has been available for public review through the process. No public comments were received." It is not appropriate to state that "No public comments were received in a document that had not yet been put out for public notice. This statement (if true) can be made in the Draft-Final Five Year Review.

14. Section 7.0 Page 16

The Department does not understand the following TWO sentences, "The LUC for Site 3 have been met. While the majority of the remedy selected for Site 1 and Site 3 is functioning as intended, some portions are not." Please clarify "how the LUC for Site 3 have been met." Additionally if only a "majority of the remedy is functioning as intended" at Site 1 and 3, then the remedies for these sites need to be reevaluated. Please clarify.

15. Section 7.0 Page 16

The next to last sentence states, "RAOs are being met, however there exists the potential in the long term for RAO 3 to not be met due to LUC-related issues pertaining to subsistence fishing." However, as pointed out in Comment #9, the Navy/Marines have stated that the risk is due to a background (anthropogenic) source. Additionally page 18 4<sup>th</sup> paragraph states that, "As being determined by the team, the risk found in eating the fish are primarily anthropogenic..." Therefore, if the Navy/Marines believe this to be true, then the RAOs of Site 3 are still being met. This is a continuing topic of discussion and it is difficult to reach a decision on this site because of these types of inconsistencies.

16. Section 7.0 Page 17 Paragraph 3

"This study was conducted and the partnering team is considering alternatives." Please briefly discuss the alternatives that the Partnering team is considering.

17. Section 11 Page 19

The last sentence states, "The third Five Year Review will also address all sites at MCRD Parris Island." Please note that this document does not address all sites at PI. Please correct the discrepancy.

18. Table 4

Please note that several of the ARAR citations should be updated as screening values have changed.

19. Table 4

Table 4 lists RCRA as "potentially applicable". According to page 11 of the FFA, "The general purposes of this Agreement are to: Establish a procedural framework and Schedule for developing implementing and monitoring appropriate response actions at the Site in accordance with CERCLA/SARA, the NCP, Superfund guidance and policy, RCRA, RCRA guidance and policy, and applicable state law;". Therefore, RCRA is "applicable."

## 20. Figures

A figure is not provided for Site 12. Additionally a better figure could be provided for Site 3.



C. Earl Hunter, Commissioner

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## MEMORANDUM

**TO:** Meredith Amick, Engineering Associate  
Corrective Action Engineering Section  
Division of Waste Management  
Bureau of Land and Waste Management

**FROM:** Annie Gerry, Hydrogeologist  
Federal Facilities Groundwater Section  
Division of Waste Management  
Bureau of Land and Waste Management

**DATE:** May 25, 2010

**RE:** Marine Corps Recruit Depot  
SC6 170 022 762

Review of Five Year Review Report, Marine Corps Recruit Depot (MCRD),  
Parris Island, South Carolina dated March 2010

The above referenced document has been reviewed with respect to the conditions of the Federal Facility Agreement (FFA) that the Department entered into with the Navy and EPA Region 4 in January 2005. The purpose of this document is to determine whether the remedy selected in a Record of Decision (ROD) is protective of human health and the environment. This Five Year Review addresses remedies in place at MCRD with contaminants above levels that allow for unlimited use and unrestricted exposure.

Based on review of this document, the following comments have been generated.

### Comments

1. On Page 17, 2<sup>nd</sup> paragraph, the text reads,

*“Although above MCLs, as noted in the decision documents, groundwater at this site is not exposed to a human receptor. The groundwater to surface water to ecological receptors pathway has been addressed in the recent draft of the risk assessment and was found to not pose a significant risk. Extraction of any use of groundwater is prohibited beneath site 3.”*

Please be advised that all groundwater in South Carolina is classified as Class GB water per R.61-68 Water Classifications & Standards. Class GB water is considered to be potable water. Therefore, the MCS (media cleanup standard) for groundwater must be

DD100210.AMG

equal to or less than the most current published MCL (maximum contaminant level) or RSL (regional screening level) values listed at the time the remediation technology is implemented. Therefore all groundwater must meet the safe drinking water standards, or MCLs, regardless of the perceived risk potential to any receptors

2. On Table 4-Federal ARARs/Media Clean-up Standards and TBCs, Page 1 of 4, under heading 'Rationale for Use at MCRD Parris Island,' first line, reads:

*"Would be used as protective levels for groundwater that are current or potential drinking water sources; However groundwater is saline to brackish and is not a viable drinking water source."*

This statement is not correct. Please refer to Comment 1 and revise this statement.

3. Table 4-Federal ARARs/Media Clean-up Standards and TBCs, Page 2 of 4, under the heading 'Location-Specific ARARs- Concurrent State Regulations are not listed so the table needs to be revised to include a reference applicable to S.C. regulations, (e.g. the SC Water Classifications and Standards).
4. Page 19, Section 9.0- Recommendations and Follow Up Actions- Site 45 is not listed in this section. Please add a discussion stating that contaminants above their respective MCLs are discharging to the marsh and make recommendations to address the discharge of contaminants to the marsh from Site 45
5. Please quote the Five Year Review guidance (*EPA Comprehensive Five Year Review Guidance, June 2001- OSWER No. 9355.7-03B-P*) used to generate this report.

Should you have any questions regarding this memo, please contact me via email at [GerryAM@dhec.sc.gov](mailto:GerryAM@dhec.sc.gov) or by phone at (803) 896-4018.