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MCRD PARRIS ISLAND
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LETTER REGARDING U S EPA REGION IV COMMENTS ON DRAFT 2010 FIVE YEAR
REVIEW REPORT MCRD PARRIS ISLAND SC (PUBLIC DOCUMENT)

5/28/2010
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-8960**

May 28, 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4SD-FFB

Naval Air Station, JAX
Navy Facilities Engineering SE
Installation Restoration, SC IPT
Attn: Charles Cook
PO Box 30
North Ajax Street, Bldg 135
Jacksonville, FL 32212-0030

And

Commanding General
Marine Corps Recruit Depot
Natural Resources & Environmental Affairs
Attn: Tim Harrington
PO Box 5028
Parris Island, SC 29905-9001

SUBJ: EPA Review of the Draft 2010 Five Year Review For Marine Corps Recruit Depot (MCRD), Parris Island, SC. (March 2010)

Dear Sirs:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above referenced document. The Navy should respond to these comments, incorporate necessary language/changes into the draft final document, and submit a redline report for final review/confirmation. Comments generated by this review include the following:

SPECIFIC COMMENTS:

1. **Page 3-4:** Include a line for the Site 3 IROD, signed by EPA in September of 2000, the first Five Year Review (5YR) approved in September 2005, the Site 12 Remedial Action Start in October 2005, and the Site 12 Remedial Action Completion in September 2007.

2. **Page 6, last paragraph, 3rd sentence:** Please modify the text to read "... in 2002, and conditionally approved in early 2005."
3. **Page 7:** After the first full paragraph regarding Site 12, add another paragraph briefly describing the history of contamination at Site 12 and the response action taken. Then move all of the Site 12 information to be included before the Site 45 information, in order to keep those Sites which have remedies in place together as the focus of the document.

Include a Table in the back showing Site 12 COCs and reference it in the text here.

4. **Page 7, just before the last paragraph of Section 3 AND Page 14-15, last 4 paragraphs of Section 5:** Section 5, Progress Since Last Review, is intended to address those sites which have remedies in place requiring a FYR. Therefore, the appropriate location for the last 4 paragraphs of Section 5 (addressing Sites 45, 27, 14, and 5) is in Section 3, Background. Please relocate these paragraphs to Section 3, immediately after the existing paragraph in Section 3 that addresses Site 45. Consider adding subheadings (and restructuring paragraphs) to Section 3, identifying those sites which required "No Action" (Sites 2/15), Sites with "Remedies In Place" (Sites 1/41, 3, and 12), and "Other Sites in Progress" (Sites 45, 27/55/9/16, 14, 5, etc.). This will help to keep the focus on remedies which require 5YRs.

For each site addressed, please ensure the information suggested by the 5YR Guidance is briefly discussed. The 5YR Guidance specifies for each site the physical characteristics, land and resource use, history of contamination, initial response action, and summary of basis for taking an action is to be described very briefly.

5. **Page 7, last paragraph before Section 4:** Table 3 is missing. Please add the table. It can be updated from the 1995 accounting as mentioned, or could be an update from the most recent SMP listing of sites, in which case modify the text to reflect that.
6. **Page 7, Section 4 Remedial Actions, last bullet:** Table 5 is missing. Include it or correct the text.
7. **Page 9, first partial paragraph:** The text states "... the LUCIP is enforced; however, the reporting requirement of the LUCIP has not been implemented." The reporting requirement is a condition which must be met. Please submit an annual report immediately for all Sites requiring annual reporting and include it as an attachment to this report. (Also see similar site 3 discussion on Page 10.)

Also, for all Sites requiring LUCs, please include a figure that shows the LUCs and LUC boundaries, and reference it in the text.

8. **Page 10, last paragraph, 3rd sentence:** Please add the words "subsistence level" after "human" and before "ingestion".

9. **Page 11, first paragraph, 1st sentence:** Please insert the words “in support of a Final ROD” after “Proposed Plan” and before “for Site 3”.
10. **Page 11, first paragraph:** No Attachments have been included. Please include the Attachments, or correct the text.
11. **Page 12, last bullet:** Table 5 is missing. Include the table or correct the text.
12. **Page 13, just before Section 5:** Add a paragraph explaining that LUCs were required at Site 12.
13. **Section 5, Progress Since Last Review:** This section is intended to address progress made towards issues and recommendations made in the previous 5YR, and to describe its impact on protectiveness. Therefore, please include the following, as suggested by EPA’s 5YR Guidance:

Before the Site 1 discussion, present the previous 5YR Protectiveness Statement, as well as issues and recommendations. After the discussion of progress made at each Site, describe the impact of the progress on the issues and recommendations affecting protectiveness for that Site.
14. **Page 14, paragraph discussing Site 3:** In the last sentence insert the words “most likely” after “are” and before “not”.
15. **Page 15:** Include the LUC letters mentioned in the last bullet as an attachment.
16. **Page 15, last paragraph:** Site 12 should also have been inspected. Please modify the first sentence to reflect that is the case, and also include the date of the inspection, attach the inspection report and reference it. If this is not the case, then Site 12 must be inspected first.
17. **Page 16, Section 6, Site 3, 4th sentence:** Please add the words “occurring prior to the last 5YR” after “hand-hole location” and before “there”.
18. **Page 17, last paragraph:** Please include at least the most recent Site 1 groundwater results.
19. **Page 17, sediment results:** Please include the value being used to evaluate copper results.
20. **Page 18, second paragraph, 2nd sentence:** Please modify as follows “For Sites 1, 3, and 12 annual visual inspections...” and attach the reports mentioned in the next sentence.
21. **Page 18, 4th paragraph, starting with the 5th sentence:** Please modify the text to read “Under consideration by the Parris Island remediation team is the determination that the risk found in eating fish are primarily ubiquitous anthropogenic risks (i.e. due to

atmospheric deposition of PCBs) and thus are probably not related to the site remedy. A Final ROD is being developed and will reflect the team's final determination regarding this exposure. There are no"

22. **Page 18, Issues:** Please explain if this was an issue identified during the inspection, or simply an assumed issue related to *potential* erosion due to the marginal success of revegetation efforts in the marsh. If the latter, please clarify so in the Issue column.
23. **Page 19, Recommendations:** For each recommendation, a schedule for completion must be provided.
24. **Page 19, Protectiveness Statement:** In accordance with the 5YR Guidance, each Site should have a protectiveness statement. If this statement is meant to apply to all three sites in question, then modify the text as follows, " For Sites 1, 3, and 12: The remedies..."
25. **Page 19, Next Review:** Please modify the text to read "The third Five Year Review will be required five years following the date of approval of this 5YR by EPA."

This completes EPA's comments regarding the 2010 5YR for Parris Island. If there are any questions on these comments, please do not hesitate to contact me at (404) 562-9969.

Sincerely,



Lila Llamas
Senior RPM

cc: Meredith Amick, SCDHEC
Annie Gerry, SCDHEC
Mark Sladic, TtNUS ✓