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MCRD PARRIS ISLAND  
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EMAIL REGARDING U S EPA REGION IV COMMENTS ON LAND USE CONTROL  
LANGUAGE FOR SIGN AT SITE 3 CAUSEWAY LANDFILL MCRD PARRIS ISLAND SC  
9/9/2010  
U S EPA REGION IV

**From:** [Llamas.Lila@epamail.epa.gov](mailto:Llamas.Lila@epamail.epa.gov)  
**To:** [Sladic, Mark](#); [Meredith Amick](#); [Stacey French](#); [Joe Bowers](#); [Annie Gerry](#); [Kent Krieg](#); [Pat Franklin](#); [Charles CIV NAVFAC SE Cook](#); [sarah.reed@navy.mil](mailto:sarah.reed@navy.mil); [Stephen A AA COUNSEL Beverly](#); [Smith, Preston](#); [Donohoe Civ Lisa C](#); [Harrington GS12 Timothy J \(timothy.j.harrington@usmc.mil\)](#); [Buxbaum.David@epamail.epa.gov](mailto:Buxbaum.David@epamail.epa.gov); [Frederick.Tim@epamail.epa.gov](mailto:Frederick.Tim@epamail.epa.gov); [mmcrae@TechLawInc.com](mailto:mmcrae@TechLawInc.com); [Llamas.Lila@epamail.epa.gov](mailto:Llamas.Lila@epamail.epa.gov)  
**Subject:** MCRD PI Site 3 sign - proposed language - EPA Preliminary Response  
**Date:** Thursday, September 09, 2010 10:50:09 AM  
**Attachments:** [SITE 3 LUC SIGN LANGUAGE - EPA Suggestion.doc](#)  
**Importance:** High

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NOTE: This is my second attempt to send this from home. INOTES stalled. If you get it twice, I apologize.

Greetings,

Attached you will find a file which contains EPA's suggestions of two options for LUC sign language at Site 3.

After reviewing both the Navy/MCRD's proposed language, and SCDHEC's revised compromised language, EPA still has concerns that the fish consumption pathway may not be mitigated by the language proposed. EPA's first option has suggested language which specifies potential health risks associated with fish consumption. This language is felt to more likely alert consumers to risks associated with consumption of fish from the pond, and provides the reference for more information. This option would be expected to be combined with risk communication efforts. The second option provides language which eliminates the fish consumption pathway via a use restriction on the federal property, specifically prohibiting fishing from the federal property. Either option, would be considered as acceptable to EPA as a portion of the remedy to mitigate potential unacceptable risks due to fish consumption.

If the Navy is able to obtain concurrence from SCDHEC for either option, contingent upon the language being specified in the ROD, then the language should be included in the PP as requested by SCDHEC. However, if neither option is accepted by SCDHEC and will result in non-concurrence with the Proposed Plan by SCDHEC, then EPA suggests the Proposed Plan simply specify the need for LUCs, including signs, to mitigate the fish consumption unacceptable risks. The specific language could then be negotiated in a LUC Remedial Design at that point in the CERCLA process. This allows for potentially obtaining SCDHEC concurrence with sign language at some time in the future. This would also potentially allow for a more flexible LUC Remedial Design which could provide for a variety of signs and approaches which address the exposure, to be chosen as desired by the Navy/MCRD at various times in the future. If it is found the signs are not being protective, changes could be made in the future more easily through the LUC RD, rather than through a change to the ROD.

Regarding the remainder of the Proposed Plan, EPA plans to provide either Draft comments informally, or hopefully final comments, by the end of the week. Look for future emails regarding this matter. Due to the Navy/MCRD's request for expedited review, the comments may only be general in nature, with some specific references as examples. Since the revision of the PP did not follow EPA's previous comments, and the revised document is substantially different, the Navy/MCRD should understand they are taking the risk that the next revision may not be sufficient either. Therefore, after receiving EPA's expedited comments, the Navy/MCRD may wish to consider another D1 revision prior to September 30, 2010.

Call me with questions,

Lila Llamas

404-562-9969

**MCRD PARRIS ISLAND**

**WARNING:**

**Potential Health  
Risks Associated  
with Eating Fish.**

**For More  
Information Contact:**

**(843) 228-3423**

**MCRD PARRIS ISLAND**

**NOTICE:**

**No Fishing Allowed.**

**For More  
Information  
Contact:**

**(843) 228-3423**

