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MCRD PARRIS ISLAND
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LETTER AND THE U S EPA REGION IV COMMENTS REGARDING THE FIVE YEAR REVIEW
REPORT MCRD PARRIS ISLAND SC (PUBLIC DOCUMENT)
09/19/2005
U S EPA REGION IV ATLANTA GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960**

SEPT 19 2005

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

4WD-FFB

Brigadier General Richard T. Tryon
Commanding General
Marine Corps Recruit Depot
P.O. Box 5028
Parris Island, SC 29905-9001

SUBJ: Five Year Review Report
MCRD Parris Island NPL Site
Parris Island, South Carolina

Dear General Tryon:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the Five-Year Review Report. The remedies are supported by the previously completed Remedial Investigation, Feasibility Study and Baseline Risk Assessment reports. They are also supported by the review of the current applicable or relevant and appropriate requirements (ARARs). However, EPA agrees that there are issues of concern which need to be addressed and which require follow-up actions. Therefore, EPA concurs with the Navy's protectiveness statement in that the remedies selected for the two operable units OU1 and OU3 are protective of human health and the environment in the short term; however, to be protective in the long-term, followup actions need to be taken.

While EPA agrees in general with the issues identified in this report and the follow-up actions proposed by the Navy, it has become apparent to EPA that some of EPA's comments on the draft version of this document were not addressed as agreed to by the Tier I Partnering Team, and must therefore be repeated in this concurrence letter for clarification purposes. Please see the enclosed comments hereby made for clarification to this report and to be included in the administrative record.

This document also provides a summary of other sites currently requiring action at MCRD Parris Island based on existing data and information. These sites are included in the Installation Restoration Program at MCRD Parris Island. Discussions and recommendations are included in the text concerning all pending and ongoing remedial actions. These recommendations will undergo further review by my staff and will be documented by other reporting mechanisms.

Again, EPA concurs with the protectiveness statement, agrees that issues exist which require follow-up actions, and further agrees that the final details of these and other potential follow-up actions will be further negotiated and documented in the appropriate Record of Decisions, Land Use Control Remedial Designs, Long-Term Monitoring Plans, and Remedial Action/Construction Completion Reports. Therefore, this letter does not require a response. However, if you have any questions, please feel free to contact Lila Llamas of my staff at (404) 562-9969.

EPA appreciates the coordination efforts of MCRD Parris Island and the level of effort that was put forth in developing this Five Year Review Report EPA looks forward to continuing the exemplary working relationship with MCRD Parris Island and Naval Facilities Engineering Command Southern Division as we move toward a final cleanup of the NPL site.

Sincerely,

Alan Farmer, Acting Director
Waste Management Division
RCRA, Federal Facilities and Brownfields

Enclosure (1)

cc: Tim Harrington, MCRD
Art Sanford, NAVFAC
Stacey French, SCDHEC
Jerry Stamps, SCDHEC
Don Hargrove, SCDHEC

EPA Comments on the Five Year Review Report. MCRD, Parris Island. SC

- **Five Year Review Summary Form, page F-1 and F-2.**

The number entered as the EPA ID (from WasteLAN) is incorrect. The correct number is SC6170022762. It has been corrected on the copy we received. Please make sure it is corrected on other copies.

Also, for page F-2, see comments below regarding Section 8.0 ISSUES and Section 9.0 RECOMMENDATIONS AND FOLLOW-UP ACTIONS.

- **Section 7.0 TECHNICAL ASSESSMENT, page 15.**

Question A: Is the remedy functioning as intended by the decision documents?

It appears there is some confusion in the Remedial Action Objectives (RAO) listed and numbered in the Five Year Review (5YR) Report versus those identified in the Interim Record of Decision for Solid Waste Management Unit (SWMU) 3 (also see the Draft Record of Decision for SWMU 1). What is important to EPA is that EPA agrees that the remedies have not completely functioned as intended, based on Land Use Controls (LUC) incidents, as well as subsidences noted at landfills. Either of these factors could impact RAOs in a variety of ways, other than just those identified in the report.

- **Section 8.0 ISSUES, page 17.**

The 5YR Guidance states that issues which currently prevent the response action from being protective, or which may do so in the future, should be identified. The Tier I Team had agreed to identify the issues as follows:

ISSUE:	Currently Affects Protectiveness (Y/N)	Affects Future Protectiveness (Y/N)
Inadequate LUCs	N	Y (if left unaddressed)
Subsidence at Landfills	N	Y (if left unaddressed)

This is how EPA will track issues for MCRD Parris Island in the CERCLIS database.

- **Section 9.0 RECOMMENDATIONS & FOLLOW-UP ACTIONS, page 17.**

EPA offers the following regarding the details of the proposed follow-up actions in this report:

- First bullet - Even though revegetation is an issue at SWMU 1 only, subsidences need to be monitored and addressed at both SWMU 1 and SWMU 3.
- Second bullet - While the guidance states that additional action items can be added, EPA will not track this item since ground water monitoring was not an issue in the report.
- Third bullet - EPA agrees this is a good start for follow-up actions to address LUC incidences, but realizes other actions may also be necessary. EPA agrees that the final requirements will be negotiated and documented, and will do so in regulatory documents other than this report.

Subaction #4 needs to be worded as an action instead of a statement. According to discussions with the Marines, this should read, "Develop a Land Use Control Section for the Installation Restoration Collaboration Gateway."

Subaction #5 should address training specific to the Depots LUC policies and procedures, as opposed to just NEPA training, and as agreed to by the Tier I Team.

- Additionally, EPA requested the Navy/Marines to identify the party responsible for implementation, the agency with oversight authority, a recommended schedule for implementation and completion, and the impact, if any, on current or future protectiveness, for each of the follow-up actions. Since this was not included in the report as requested, EPA will decide what is believed to be accurate and propose due dates, and then enter the information into the CERCLIS database for tracking purposes. In the future, if the MCRD would like to provide this information, they may do so by contacting Lila Llamas at 404-562-9969.