



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number ///



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STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE  
SUITE E-845, PERIMETER PARK  
2510 MT. MORIAH  
MEMPHIS, TENNESSEE 38115

RECEIVED  
MAY 10 1995

May 8, 1995

Commander  
Defense Distribution Depot Memphis  
Attn.: DDMT-WP (Mr. Frank Novitzki)  
2163 Airways Blvd.,  
Memphis, Tennessee 38114-5210

Re: DDMT Draft Final Generic RI/FS Work Plan, and DDMT Draft Final Screening  
Sites Field Sampling Plan, both dated March 1995, TDEC/DSF #79-736, cc 82

Dear Mr. Novitzki:

The Division of Superfund (DSF) Memphis Field Office (MFO) has reviewed the above  
referenced documents for DDMT, received in this office on 3/15/95 and 3/20/1995,  
respectively.

Pursuant to the intent of the Federal Facilities Agreement (FFA), the Tennessee  
Department of Environment and Conservation (TDEC) is providing the attached  
comments. Should you have any questions or concerns regarding this review please call  
me at (901) 368-7958.

Very truly yours,

James W. Morrison, P.G.  
Environmental Project Manager  
TDEC/DSF-MFO

c: TDEC/DSF, NCO, Clint Willer, file  
TDEC/DSF, MFO, file  
Martha Berry  
United States Environmental Protection Agency  
Federal Facilities Branch  
345 Courtland Street, N.E.  
Atlanta, GA 30365

**COMMENTS FOR DDMT ON  
GENERIC RI/FS WORK PLAN  
DRAFT FINAL, MARCH 1995**

**General Comment:**

This document is thorough and well organized. It is far superior to its predecessor. Good Job!

**Specific Comments:**

1. Executive Summary, Conceptual Site Model, second sentence, page vi.  
Add the word "potentially" between the words Humans ( ) at risk
2. Executive Summary, Generic RI/FS Objectives, 2nd paragraph page vi.  
Delete second phrase of first sentence, it is awkward and unnecessary.
3. Executive Summary, Summary of RI/FS tasks, second paragraph, page vi.  
Insert the words "ground water, surface water" in place of the word "water" in the first sentence.
4. Executive Summary, Cleanup Actions, first paragraph, page vi.  
Substitute the word "attenuate" for "eliminate". This word is more accurate.
5. Section 1.4.1 Observational Approach, second paragraph, page 1-12.  
Typo - "remedition" should be "remediation".
6. Section 1.4.1 Observational Approach, second set of bullets, page 1-13.  
Probable Condition - Due to the presence of DNAPL type contaminants present at DDMT vertical extent needs also needs to be known. Please add and expand on this bullet.
7. Section 1.4.2, Interim Removal Actions, page 1-14.  
This section is repetitious, awkward and rambles. Please rework it.
8. Section 1.4.3, Early Removal, first paragraph, page 1-17.  
This paragraph is awkward and has tense problems. Please rework it.
9. Section 2.2.4, Environmental Audit, page 2-5  
Is Building 873 the same as site 27, 27, 60? Please expand this section for clarity.

10. Table 2-1, Sample Results PCP Dip Vat Tank Building, Page 2-6.  
This table is not presented well. PRGs and RBCs should be included for reference where applicable. Also separate soils data from building and tanks data.
11. Section 2.2.5, PCP Dip Vat Tank Investigation, third paragraph, page 2-7.  
Last sentence adds nothing to this discussion, please delete.
12. Section 2.2.7, RI/FS, page 2-8.  
For clarity purposes, the last sentence should follow either the second or third sentence.
13. Section 2.2.9, Interim Groundwater Contamination Remediation, pg. 2-8.  
The acronym "IRA" has not been used recently please treat it as if it were a first time introduction. Additional, this comment is appropriate for similar occurrences of acronyms that are used infrequently.
14. Section 2.3.3., OU-3 Southeastern Watershed, page 2-11.  
The very last sentence that begins with the word "Because" appears incomplete. Please restructure sentence.
15. Section 2.4.4, Surface Soils, third and fourth bullets, page 2-21.  
Please delete speculative sentences regarding pre-development soil conditions at the facility.
16. Figure 2-7, General Geologic Cross Section, page 2-24.  
Please delete sea level line, it is confusing.
17. Figure 2-10, Cross Section C-C', page 2-34.  
The lens that is tagged by STB-8 is not described in legend. (diagonal dashes only)
18. Figure 2-11, Cross Section D-D', page 2-35.  
See previous comment. (Lens tagged by MW-27.)
19. Section 2.4.6.2, DDMT Hydrogeology, Jackson Formation / Upper Claiborne Group, fifth paragraph, page 2-46.  
Delete last phrase of last sentence, this is highly speculative phrase.
20. Section 2.4.6.3, Groundwater Pumpage and Use, 1st para., pg. 2-48.  
Last sentence is speculative and inappropriate, please delete.

21. Section 3.1, Nature and Extent of Known Contamination, 2nd paragraph, page 3-1.  
Please date and reference the RI referred to in the first sentence.
22. Section 3.1.1.2, Groundwater, 5th paragraph, page 3-6.  
Has the possibility of facilitated transport of contaminants been ruled out at DDMT, if not this statement is incorrect. Please verify and modify if necessary.
23. Section 3.2.1, Contaminant Fate and Transport, page 3-19.  
The first sentence is awkward. Please rewrite for clarity.
24. Section 3.2.1.2, Metals, 3rd & 4th paragraphs, page 3-20.  
See comment 22. In addition, recent EPA ESD guidance notes that groundwater samples with high turbidity levels will not be representative of GW. Furthermore, filtering is not allowed because colloidal particles can become trapped in filter due to excess turbidity entrapment in filter. Please restructure this text to avoid this potential pitfall.
25. Section 3.5.2 Chemical-Specific Threshold Concentrations, 3rd paragraph, page 3-50.  
The sentence regarding Region III guidance appears contradictory. Please rewrite for clarity.
26. Section 3.5.3.2, Sediment and Soil Media, page 3-68.  
Has the need to obtain Aquatic Resources Alteration Permits (ARAP) been addressed. Please verify and incorporate for completeness.
27. Section 3.5.3.3, Air Media, page 3-69.  
Air permits for Shelby County are issued by the County. Please revise text to reflect this.
28. Section 3.7, Generic Conceptual Site Model, page 3-77.  
The first sentence in the last paragraph appears to belong in the previous one. Please rewrite for clarity. The text in general on this page is awkward and may need rewriting for clarity.

**COMMENTS FOR DDMT ON  
SCREENING SITES FIELD SAMPLING PLAN  
DRAFT FINAL, MARCH 1995**

**General Comments:**

Although this document is well organized, easily read, and far superior to its predecessor, TDEC believes that the following comments warrant revisiting.

Because of recent events (DDMT may soon be going BRAC), forethought needs to be given to the fact that buried potentially hazardous waste can not be left in place; especially if Findings of Suitability to Transfer (FOST) property are proposed at DDMT. An example of this is Site 21 where XXCC-3 impregnite was buried. According to the text this material can produce hazardous degradation constituents. TDEC suggests that sites such as these may be better addressed by an early removal action followed by confirmatory sampling.

TDEC is mystified at the scope of the sampling strategies and lack of rationale proposed in this document. The following three points apply to the majority of screening sites in Section 4.0.

1. While it is true that the proposed sampling strategies will detect any contaminants potentially present at these screening sites, a more parsimonious approach to sampling may yield the same information (DPT). As stated in the Section 1.1 Goals and Objectives, "The SSFSP's intent is not to fully delineate the nature and extent of soil ... contamination..., but to ... identify the likelihood of contamination." The scope of the proposed sampling events are more on the order of an OUFSP RI than simply of a confirmatory nature.
2. Granted that sample location rationale is stated generally in Section 4.0.1, it is either incomplete or missing in the individual screening site sections. For completeness, describe more fully sample location rationale when and where possible. The SSFSP is not a generic document.
3. Although sample depth rationale is stated in Section 4.0.2, the sample depths stated in a majority of the individual screening site sections are inconsistent with what is proposed in Section 4.0.2. Please redo the appropriate individual screening site sections for consistency. Also, TDEC would appreciate a more detailed discussion of the rationale for the number and depth of samples proposed for these screening sites.

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