



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 115

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STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE  
SUITE E-645, PERIMETER PARK  
2510 MT. MORIAH  
MEMPHIS, TENNESSEE 38115

**RECEIVED**  
JUN 15 1995

June 13, 1995

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

Re: DDMT Operable Units 1, 2, 3, & 4 Field Sampling Plans, dated March to April 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 3/28/95 to 4/10/1995.

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

**TDEC COMMENTS ON DDMT  
OPERABLE UNITS 1, 2, 3, & 4 FSPs  
dated MARCH to APRIL 1995**

**General Comments:**

1. All of the OU-FSPs are well organized and easily read. Good job!
2. The phased sampling approach (i.e. - biased sampling first followed by probabilistic sampling, if warranted) as stated in the Section 3 is to be sufficient in scope to support final site status decisions (e.g. upgrade, downgrade, and IRAs). While there is no doubt that the scope of the sampling as proposed in these document will attain this objective for all the sites, TDEC has noted that in some instances the phased approach is not always followed. An example of the phased approach not being followed is Site 6 in OU#1 (Eye Ointment Burial Site) where 19 samples are proposed for a site that is not known or suspected to contain any hazardous substances. A more appropriate phased sampling approach for this site would be to first confirm the presence hazardous contaminants with a few biased samples in the known burial area and then, if warranted, probabilistic sampling. Since DDMT is slated for BRAC, a second alternative to probabilistic follow-up sampling would be confirmatory sampling upon removal. It is TDEC's opinion that given the present climate of austerity in our government, remedial dollars should be spent as wisely as possible while accomplishing our objectives.
3. With regard to the previous comment and being that DDMT is probably going BRAC, it is TDEC's opinion that biased sampling followed by confirmatory sampling is appropriate and preferred at sites when removal actions are initially considered (e.g. Golf Course Pond and Lake Danielson). Please keep in mind that FOSTs and FOSLs of DoD properties are the primary goals of BRAC.

**Specific Comment:**

1. Section 4.3.6 Soil Sampling and Analysis, page 4-13.  
Please clarify and explain the rationale for using an OVA as the primary screening instrument to determine extent of contamination when an acid spill is being investigated.

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**ADMINISTRATIVE RECORD**

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**ADMINISTRATIVE RECORD**

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