



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 123

Operable Unit 1
Field Sampling Plan

for

Defense Distribution Depot Memphis

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Prepared for

U.S. Army Corps of Engineers
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Operable Unit 1 Field Sampling Plan Executive Summary

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Introduction

In October 1992, the Defense Depot Memphis, Tennessee was placed on the National Priorities List by the U.S. Environmental Protection Agency. Therefore, Defense Depot Memphis, Tennessee must fulfill requirements under the Comprehensive Environmental Response, Compensation, and Liability Act and National Oil and Hazardous Substance Contingency Plan. A Remedial Investigation/Feasibility Study will be conducted to evaluate the nature and extent of contamination, to evaluate the risk to human health and the environment, and to screen potential cleanup actions. The *Generic Remedial Investigation/Feasibility Study Work Plan* was prepared to show how the investigation and study will be accomplished. This field sampling plan was prepared for Operable Unit 1 as a supplement to the *Generic Remedial Investigation/Feasibility Study Work Plan*. The objective of this *Operable Unit 1 Field Sampling Plan* is to present a detailed description of the proposed sampling and analysis activities that will be performed for characterization of the remedial investigation sites in Operable Unit 1 at Defense Depot Memphis, Tennessee.

The ultimate goal of the Remedial Investigation/Feasibility Study is to select cost-effective cleanup actions that provide protection of public health and the environment. To accomplish this goal, the nature and extent of the release of hazardous substances must be identified, the source of release must be determined, and proposed cleanup actions must be evaluated. By implementing the field investigation strategies described in the Field Sampling Plans, the quantity and quality of data collected will aid in achieving the goal of the Remedial Investigation/Feasibility Study at Defense Depot Memphis, Tennessee.

Site Background and Location

Defense Depot Memphis, Tennessee receives, warehouses, and distributes supplies common to all U.S. military services and some civil agencies, located primarily in the southeastern United States, Puerto Rico, and Panama. The installation covers 642 acres of land in Memphis, Shelby County, Tennessee, in the extreme southwestern portion of the state. The installation contains approximately 110 buildings, 26 miles of railroad track, and 28 miles of paved streets. Approximately 5.5 million square feet of storage space is open. Stored items include food, clothing, electronic equipment, petroleum products, construction materials, and industrial, medical, and general supplies used by all military branches of the U.S. government.

Description of Operable Units

Defense Depot Memphis, Tennessee is divided into four operable units for evaluation purposes. Operable Unit 1, north of the Main Installation, is called Dunn Field. The Main Installation is divided into three areas: the southwestern quadrant, Operable Unit 2; the southeastern quadrant including Lake Danielson and the golf course area, Operable Unit 3; and the north-central area, Operable Unit 4. Sites identified in Operable Unit 1 for investigation resulted from use of the area for landfill operations, mineral stockpiles, pistol range use, and materials storage. Potential contamination of Operable Unit 2 may have resulted from spills or releases from the hazardous material storage and repouring area, sandblasting and painting activities, or both. Storage of polychlorinated biphenyls and the use of pesticides and herbicides are potential sources of contamination for Operable Unit 3. Principal contamination in Operable Unit 4 probably resulted from a wood treatment operation and hazardous material storage.

Soil samples taken in Operable Unit 1 near a pesticide storage area during previous investigations indicated the presence of pesticides. Other samples from Operable Unit 1 yielding positive results for the presence of contaminants include the open burning area, which had evidence of petroleum products and chlorinated solvents; a sample collected in the south-central portion of Operable Unit 1, which had volatile organic compounds, pesticides, and metals; and the bauxite storage area, which exhibited solvents and pesticides.

Groundwater analyses in the Fluvial Aquifer reveal contaminant migration beyond Dunn Field's boundaries. Contaminants of concern are chromium, lead, mercury, arsenic, barium, and solvents. A groundwater interim remedial action is being implemented to address the groundwater contamination.

Summary of Field Sampling Plan

This Field Sampling Plan describes the Defense Depot Memphis, Tennessee facility and individual operable unit history and data gaps, locations, geography, surface water hydrology, geology, hydrogeology, land use, and Operable Unit 1 data needs. Additionally, this Field Sampling Plan describes the sampling strategy and sampling plan for the remedial investigation sites at Operable Unit 1. The final section of the plan describes the data needs required to propose remedial alternatives for Operable Unit 1. The purpose of this effort is to characterize potential releases from the site, to delineate the nature and extent of soil and groundwater contamination attributable to past operations, and to gather data to evaluate the feasibility of remedial actions for this site.

A cost-effective, quality sampling strategy has been developed to perform an Remedial Investigation/Feasibility Study at Defense Depot Memphis, Tennessee. This Field Sampling Plan uses an observational approach to field data collection and making field-based decisions to achieve the goals of the facility. The approach presented is intended to support a recommendation of one of the following options for each remedial investigation site:

- Site upgrade (FS, Remedial Design, and Remedial Action)
- Site downgrade (support No Further Action)
- Interim Remedial Action (IRA) or Early Removal

To support recommendations in a timely manner, soil and water samples will be collected at Operable Unit 1 and analyzed using Level 2 methods in a fixed-based laboratory.

Ten percent of the Level 2 samples will be sent to an offsite laboratory for Level 3 confirmational analysis. On the basis of Level 2 and Level 3 data, a comparison of regulatory levels and calculated risk levels of contamination will aid in supporting the appropriate recommendation.

Proposed Sampling

The *Operable Unit 1 Field Sampling Plan* describes remedial investigation sites that have been identified on the basis of their potential for contamination as a result of past practices. Surface and subsurface soil samples have been proposed for each site. Soil borings will be installed surrounding and within the proposed site locations. Soil samples will be collected at regular intervals from each boring to assess the vertical extent of contamination. Surface and subsurface soil samples will be collected and analyzed to assess the possibility of existing soil contamination.

Four data quality levels are used at the facility. Level 1 data are gross data for field screening purposes, such as pH, temperature, and organic vapor analyzers and readings. Level 2 and Level 3 data are used for making field decisions, describing the nature and extent of contamination, and for risk assessment. The differentiating criteria (between Level 2 and 3) are the amount of laboratory documentation required and cost. Level 4 data are used primarily for legal arbitration, and the cost for developing these data is excessive. Therefore, Level 4 is not currently proposed. A more complete discussion of data quality levels is presented in Section 8.0 of the *Quality Assurance Project Plan*.

If Level 2 soil boring data indicate that a release of contaminants has potentially occurred to groundwater, monitoring well(s) may be installed adjacent to site(s). The decision to install wells will be made on a site-by-site basis. The decision to install monitoring well(s) will be made after Level 2 soil boring data have been discussed with Defense Depot Memphis, Tennessee personnel and remedial options have been considered.

By implementing the *Operable Unit 1 Field Sampling Plan*, the Remedial Investigation/Feasibility Study can be conducted in a cost-effective, timely manner. Additionally, data will be obtained that will aid in supporting an evaluation of remedial alternatives for cleanup of Operable Unit 1 at Defense Depot Memphis, Tennessee.

Chemical Warfare

Historical disposal of chemical warfare material (CWM) has occurred in the western portion of Dunn Field. Because there is a potential that CWMs may be encountered during intrusive investigations at the western portion of Dunn Field, DDMT has requested assistance from the U.S. Army Corps of Engineers—Huntsville Division, Ordnance and Explosives Division, to prepare a site safety submission. This document is being prepared so that the investigation in the Dunn Field area will be performed safely and with appropriate engineering controls to protect onsite workers and nearby residents. Investigation activities presented in this Field Sampling Plan will not be performed until the site safety submission is approved by the Department of Health and Human Services.

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1	Dunn Field (OU-1) Investigation Site Location Map
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AOC	Area of concern
ARAR	Applicable or relevant and appropriate requirement
ASTM	American Society for Testing and Materials
bls	Below land surface
BRA	Baseline risk assessment
BRAC	Base Realignment and Closure
CAIS	Chemical agent identification set
CEHND	U.S. Army Corps of Engineers—Huntsville Division
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
CL	Low plasticity clay
COC	Contaminant of concern
COE	U.S. Army Corps of Engineers
CWA	Chemical warfare agent
CWM	Chemical warfare materials
CWMP	<i>Chemical Warfare Management Plan</i>
DANC	Decontamination agent—non-corrosive
DDD	Dichlorodiphenyldichloroethane
DDE	1,1,1-Dichloro-2,2-bis(4-chlorophenyl)ethylene
DDMT	Defense Depot Memphis, Tennessee
DDT	Dichlorodiphenyltrichloroethane
DHHS	Department of Health and Human Services
DLA	Defense Logistics Agency
DOD	Department of Defense
DOI	Department of Interior
DQO	Data quality objective
DRMO	Defense Reutilization and Marketing Office
EPA	U.S. Environmental Protection Agency
ER	Early removal
ESE	Environmental Science & Engineering, Inc.
FBL	Fixed-based laboratory
FFA	Federal Facilities Agreement
FR	<i>Federal Register</i>
FRL	Final remediation level
FS	Feasibility study
FSP	Field Sampling Plan
ft ² /min	Feet squared per minute
FTL	Field team leader
GC	Gas chromatograph
gpm/ft	Gallons per minute per foot
HASP	<i>Health and Safety Plan</i>

Acronyms (cont'd.)

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HRS	Hazardous ranking system
HQ/HI	Hazard quotient/hazard index
HTW	Hazardous and toxic waste
ID	Inside diameter
IRA	Interim remedial action
µg/L	Micrograms per liter
ML	Low plasticity silt
mL	Milliliter
MS/MSD	Matrix spike/matrix spike duplicate
MW	Monitoring well
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFA	No further action
NGVD	National Geodetic Vertical Datum
NOAA	National Oceanic and Atmospheric Administration
NPL	National Priorities List
OE	CEHND Ordnance and Explosives Division
OU	Operable unit
PAH	Polynuclear aromatic hydrocarbon
PCB	Polychlorinated biphenyl
PCOC	Potential contaminants of concern
PCP	Pentachlorophenol
PID	Photoionization detector
PM	Project manager
PPM	Priority pollutant metals
PRG	Preliminary remediation goal
PVC	Polyvinyl chloride
QAPP	<i>Quality Assurance Project Plan</i>
QA/QC	Quality assurance/quality control
RA	Remedial Action
RAGS	<i>Risk Assessment Guidance for Superfund</i>
RAL	Removal action level
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RFA	RCRA facility assessment
RFI	RCRA facility investigation
RGD	Remedial goal option
RI	Remedial investigation
RI/FS WP	<i>Generic RI/FS Work Plan</i>
ROD	Record of decision
SMP	<i>Site Management Plan</i>
SOW	Statement of work
STB	Stratigraphic test boring
SVOC	Semivolatile organic compound

Acronyms (cont'd.)

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TCL/TAL	Target compound list/target analyte list
TCLP	Toxicity characteristic leachate procedure
TDEC	Tennessee Department of Environment and Conservation
TEU	U.S. Army Technical Escort Unit
THI	Target hazard index
TOC	Total organic compound
TRL	Target risk level
UCL	Upper confidence limit
USACDRA	U.S. Army Chemical Demilitarization Activity
USAEHA	U.S. Army Environmental Hygiene Agency
USGS	United States Geological Survey
VOC	Volatile organic compound

TAB

Section 1 - Introduction

1.1 Objective

The objective of this Field Sampling Plan (FSP) for Operable Unit (OU) 1 is to present a detailed description of the proposed sampling and analysis activities that will be performed for characterization of the remedial investigation (RI) sites in OU-1 at the Defense Depot Memphis, Tennessee (DDMT). Dunn Field, the area north of the Main Installation, has been designated by the U.S. Environmental Protection Agency (EPA) and DDMT as OU-1.

The purpose of this effort is to characterize potential releases from the site, to evaluate the nature and extent of soil and groundwater contamination attributable to past operations, and to gather data to evaluate the feasibility of remedial actions for this site.

Once the site has been characterized, the data collected will be evaluated and used to make decisions concerning this OU. Possible decisions include downgrading the site to a no further action (NFA) site, recommending the site for early removal (ER), or selecting a remedial alternative to address contamination at the site.

1.2 Regulatory Requirements

DDMT was issued a Resource Conservation and Recovery Act (RCRA) Part B permit (No. TN4 210 020 570) by the EPA, Region IV, and the Tennessee Department of Environment and Conservation (TDEC) on September 28, 1990. Subsequently, and in accordance with Section 120(d)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. 9620(d)(2), EPA prepared a final Hazard Ranking System (HRS) Scoring Package for DDMT. On the basis of the final HRS score of 58.06, EPA added DDMT to the National Priorities List (NPL) by publication in the *Federal Register*, 57FR47180 No. 199, on October 14, 1992. The RI investigation presented herein, and future investigations, are intended to satisfy the requirements of CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the RCRA Part B permit.

DDMT has entered into a Federal Facilities Agreement (FFA) between the Defense Logistics Agency (DLA), EPA, and TDEC. This agreement establishes a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions at DDMT in accordance with existing regulations and for achieving RCRA/CERCLA integration. As a result of DDMT's status as an NPL site, it was agreed that the investigation of all applicable sites would proceed under the CERCLA process for remediation (remedial investigation, feasibility study (FS), proposed plan, record of decision (ROD), remedial design, remedial action, or NFA).

As established in the NCP (40 *Code of Federal Regulations* [CFR] Part 300.120), the Department of Defense (DOD) is the lead agency at NPL sites involving federal facilities. Accordingly, EPA and TDEC have been identified as regulatory enforcement agencies in this process.

1.3 Facility and Site Status

As a result of the NPL status, the required site-specific investigations, and the FFA, DDMT has been geographically delineated into four OUs. OU-specific FSPs are being prepared for OUs-1, 2, 3, and 4. These OU-specific FSPs will provide guidelines for conducting the RI/FSs for each of the OUs. The OU-specific plans will address sites that have been known to have past releases as a result of facility operations. Schedules for completing specific tasks during the process have been submitted separately in the *Site Management Plan* (SMP).

DDMT is conducting RI/FS activities at OU-1 in conformance with the requirements of CERCLA and the FFA. In addition, elements of DDMT's RCRA permit dictate that DDMT undertake a study to confirm the absence or presence of contamination at locations where hazardous or toxic wastes were managed or disposed. This FSP addresses the sites within OU-1 that have been previously identified as requiring an RI. The remainder of the identified sites within OU-1 are proposed for one of the following four status categories:

- Screening site
- Chemical warfare site (to be investigated separately)
- NFA site
- ER site

Activities related to these sites will be addressed in the *Screening Sites FSP*, *NFA Report*, *Chemical Warfare Management Plan* (CWMP), *ER Memorandum*, or other future work plans. Each of these documents will be submitted to TDEC and EPA for review. Table 1-1 presents a summary of the sites at OU-1.

1.4 Elements of the Field Sampling Plan

This FSP is written as a supplement to the generic (facilitywide) work plans for DDMT. Information not included in this plan can be found in the generic work plans. These work plans were provided as separate documents and are listed below:

- *Generic RI/FS Work Plan (RI/FS WP)*
- *Generic Quality Assurance Project Plan (QAPP)*
- *Generic Health and Safety Plan (HASP)*

Table 1-1
OU-1 (Dunn Field)
Site Status (February 21, 1995)
Defense Depot Memphis, Tennessee

Page 1 of 4

Site Number	Description	SWMU Number	LAW Number	RFA Status	Current Status
1	Mustard and Lewisite Training Sets (6) Burial Site (1955)	1	1	PRFI	CWMP
9	Ashes and Metal Burial Site (burning pit refuse) (1955)	9	10	PRFI	CWMP
24	Former Burn Site (1946)	24	31	PRFI	CWMP
86	Food Supplies (Dunn Field)	-	29	-	CWMP
2	Ammonia Hydroxide (7 lbs) and Acetic Acid (1 gal.) Burial (1955)	2	2	PRFI	ER
3	Mixed Chemical Burial Site (orthotoluidine dihydrochloride, 1955)	3	3	PRFI	ER
4	POL Burial Site (13, 55-gal. drums of oil, grease, and paint: date unknown)	4	4	PRFI	ER
4.1	POL Burial Site (32, 55-gal. drums of oil, grease, and thinner, 1955)	-	5	PRFI	ER
5	Methyl Bromide Burial Site A (3 cubic feet) (1955)	5	6	PRFI	ER
7	Nitric Acid Burial Site (1,700 bottles) (1954)	7	8	PRFI	ER

RFA - RCRA Facility Assessment
NFA - No Further Action
PA/SI - Preliminary Assessment/Site Investigation
PRFI - Preliminary RCRA Facility Investigation
RFI - RCRA Facility Investigation
Screening - Screening Sites Field Sampling Plan
ER - Early Removal Site
RI - Remedial Investigation Site
SWMU - Solid Waste Management Unit
CWMP - Chemical Warfare Management Plan

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Table 1-1
OU-1 (Dunn Field)
Site Status (February 21, 1995)
Defense Depot Memphis, Tennessee

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Site Number	Description	SWMU Number	LAW Number	RFA Status	Current Status
8	Methyl Bromide Burial site B (3,768 - 1-gal. cans) (1954)	8	9	PRFI	ER
11	Trichloroacetic Acid Burial Site (1,433 - 1-oz bottles) (1965)	11	11	PRFI	ER
12 and 12.1	Sulfuric and Hydrochloric Acid Burial unknown quantity (1967)	12	12	PRFI	ER
13	Mixed Chemical Burial (Acid, 900 lbs., Deter., 7,000 lbs., AL2SO4, and 200 lbs. Na)	13	13	PRFI	ER
16	Unknown Acid Burial Site (1969)	16	16	PRFI	ER
16.1	Acid, date unknown	-	18	PRFI	ER
17	Mixed Chemical Burial Site C (1969)	17	17	PRFI	ER
60	Pistol Range Impact Area/Bullet Shop	-	24	-	ER
62	Bauxite Storage (Eastern Half Quadrant of Dunn Field)	-	27	-	ER
85	Old Pistol Range Bldg. 1184/Temporary Pesticide Storage	-	25	-	ER

RFA - RCRA Facility Assessment
NFA - No Further Action
PA/SI - Preliminary Assessment/Site Investigation
PRFI - Preliminary RCRA Facility Investigation
RFI - RCRA Facility Investigation
Screening - Screening Sites Field Sampling Plan
ER - Early Removal Site
RJ - Remedial Investigation Site
SWMU - Solid Waste Management Unit
CWMP - Chemical Warfare Management Plan

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Table 1-1
OU-1 (Dunn Field)
Site Status (February 21, 1995)
Defense Depot Memphis, Tennessee

Page 3 of 4

Site Number	Description	SWMU Number	LAW Number	RFA Status	Current Status
18	Plane Crash Residue (Dunn Field)	18	-	NFA	NFA
22	Hardware Burial Site (Nuts and Bolts) (Dunn Field)	22	19	NFA	NFA
23	Construction Debris and Food Burial Site (Dunn Field)	23	30	NFA	NFA
63	Fluorspar Storage (Southeastern Quadrant of Dunn Field)	-	28	-	NFA
6	40,037 units ointment (eye) Burial Site (1955)	6	7	PRFI	RI
10	Solid Waste Burial Site (near MW-10) (metal, glass, trash, etc.)	10	74	PRFI	RI
14	Municipal Waste Burial Site B (near MW-12) (food, paper products)	14	75	PRFI	RI
15	Sodium Burial Sites (1968)	15	14	PRFI	RI
15.1	Sodium Phosphate Burial (1968)	-	15	PRFI	RI
15.2	14 Burial Pits: Na ₂ PO ₄ , Na, Acid, Medical Supplies, and Chlorinated Lime	-	33	PRFI	RI

RFA - RCRA Facility Assessment
NFA - No Further Action
PA/SI - Preliminary Assessment/Site Investigation
PRFI - Preliminary RCRA Facility Investigation
RFI - RCRA Facility Investigation
Screening - Screening Sites Field Sampling Plan
ER - Early Removal Site
RI - Remedial Investigation Site
SWMU - Solid Waste Management Unit
CWMP - Chemical Warfare Management Plan

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Table 1-1
OU-1 (Dunn Field)
Site Status (February 21, 1995)
Defense Depot Memphis, Tennessee

Site Number	Description	SWMU Number	LAW Number	RFA Status	Current Status
19	Former Tear Gas Canister Burn Site (Dunn Field)	19	21	PRFI	Screening
20	Probable Asphalt Burial Site (Dunn Field)	20	20	PRFI	Screening
21	XXCC-3 Burial Site (Dunn Field)	21	22	PRFI	Screening
50	Dunn Field Northeastern Quadrant Drainage Ditch	AOC-A	23	PRFI	Screening
61	Buried Drain Pipe (Northwestern Quadrant of Dunn Field)	-	26	-	Screening
64	Bauxite Storage (Southwestern Quadrant of Dunn Field) (1942 through 1972)	-	32	-	Screening
RFA - RCRA Facility Assessment NFA - No Further Action PA/SI - Preliminary Assessment/Site Investigation PRFI - Preliminary RCRA Facility Investigation RFI - RCRA Facility Investigation Screening - Screening Sites Field Sampling Plan ER - Early Removal Site RI - Remedial Investigation Site SWMU - Solid Waste Management Unit CWMP - Chemical Warfare Management Plan					

The FSP characterizes DDMT by providing information about the facility location, topography, meteorology, surface and subsurface hydrology, geology, surrounding and site-specific land use, history, and data gaps within each site. The sampling strategy in Sections 3.0 through 3.4 illustrates the structure of the investigation, the objectives of data quality, preliminary remediation goals (PRGs), and the applicable or relevant and appropriate requirements (ARARs). The FSP will provide site-by-site information concerning the rationale behind sampling locations and methods. The FSP also will provide information about the Fluvial Aquifer (if necessary) and will describe preliminary remedial alternatives. The *QAPP* (ref. 15) will present methods for providing quality assurance to the proposed RI activities at OU-1 by documenting the procedures for well installation; development and sampling; soil, sediment and surface water sampling methods; analytical methods; abandonment methods for borings and wells; type of sampling equipment; and handling of equipment. Numbers of quality assurance/ quality control (QA/QC) samples and types are presented in Section 3.

1.5 Chemical Warfare Materials Investigation Requirements

Chemical warfare materials (CWM) have historically been disposed at the facility. There are four documented locations at Dunn Field where CWM have been disposed. The list of documented CWM sites of concern at Dunn Field is as follows:

- Mustard bomb decommissioning site (Site 24)
- Ashes and metals burial site (Site 9)
- Chemical Agent Identification Sets (CAISs) burial site (Site 1)
- Food burial site (reported to contain CAISs, Site 86)

As a result of the known CWM disposal at Dunn Field, the potential of encountering CWM in unknown locations, and the proximity to residences in the Dunn Field area, DDMT has requested assistance from agencies responsible for CWM activities. Three agencies are responsible for CWM investigation and disposition: the U.S. Army Corps of Engineers—Huntsville Division (CEHND), United States Army Chemical Demilitarization Activity (USACDRA), and the U.S. Army Technical Escort Unit (TEU).

The CEHND Ordnance and Explosives Division (OE) is responsible for conducting CWM investigations within the context of government requirements and safety requirements. In particular, the CEHND-OE is responsible during investigation and excavation of CWM sites. USACDRA is responsible for providing guidance on Interim Holding Plans and Transportation and Disposal Plans for CWM materials. The TEU is responsible for CWM assessment investigations, field CWM analytical procedures, packaging and transportation, and technical advice to CEHND.

These three agencies and DDMT have developed a strategy to evaluate the presence of CWM at the facility and to investigate sites at the facility where the potential for CWM exists. The strategy selected to accommodate both the CWM and the hazardous and toxic

waste (HTW) components of the project includes a three-phased approach. All three phases are proposed to begin simultaneously as a result of schedule efficiency and the need for ultimate removal of the CWM sites as a result of the facility's Base Realignment and Closure (BRAC) status. These three phases are discussed below.

1. Conduct an initial investigation focused on the known CWM sites at the facility. The purpose of the investigation is to evaluate the presence of and to delineate the nature and extent of potential CWM contamination at Dunn Field. These activities will be conducted by CEHND-OE.
2. Prepare a Site Safety Submission for review by the Department of Health and Human Services (DHHS). The CEHND-OE Division will prepare the Site Safety Submission.
3. Conduct necessary CWM removal actions based on the results of the field investigations. Field monitoring and screening will be performed during the field activities and appropriate control measures will be implemented to minimize the occurrence of releases of CWM.

A key component to the removal actions will include field monitoring using quick turnaround methods for identifying contaminated media. These field activities will also be used during the HTW investigation to confirm that CWM are not present during the investigation at other non-CWM sites. Additionally, these monitoring activities will provide real-time results to monitor the health and safety of the workers and the nearby residences.

As a result of the known potential for encountering CWM during the intrusive sampling at Dunn Field, a strategy will be developed to investigate Dunn Field sites in a safe and effective manner. However, this SSFSP does not include all of the necessary components to conduct investigations in the potentially contaminated Dunn Field area (western half).

Before conducting any intrusive investigation in the western half of Dunn Field, the initial investigation must be completed by CEHND-OE, the Site Safety Submission must be approved, and the monitoring and analytical requirements for CWM monitoring must be provided. Investigations in the western half of Dunn Field are delayed until these tasks are completed. Investigations in the western half of Dunn Field will be performed using the monitoring and control procedures identified in the CWM Site Safety Submission.

TAB

Section 2 - Facility and Operable Unit Description

2.0 Facility and Operable Unit Description

2.1 Location

DDMT covers 642 acres of land in Memphis, Shelby County, Tennessee, in the extreme southwestern portion of the state. Approximately 5 miles east of the Mississippi River and just northeast of the Interstate 240–Interstate 55 junction, DDMT is in the south-central section of Memphis, approximately 4 miles southeast of the Central Business District and 1 mile northwest of Memphis International Airport. Airways Boulevard borders DDMT on the east and provides primary access to the installation. Dunn Avenue, Ball Road, and Perry Road serve as the northern, southern, and western boundaries, respectively. Figure 2-1 shows the installation's location within the Memphis area.

OU-1 is located north of the Main Installation and is separated from the installation by Dunn Road. It is bounded by the Illinois Central Gulf Railroad and Person Avenue to the north, Hays Road to the east, and Dunn Avenue to the south, and is partially bounded by Kyle Street to the west. The location of OU-1 is shown in relation to the entire DDMT facility and other proposed OUs in Figure 2-2.

2.2 Operable Unit Description

OU-1 is geographically separated from the Main Installation and contains the only known and documented burial area on DDMT. OU-1 includes 6 RI/FS sites, 17 ER sites, 6 screening sites, 4 CWMP sites, and 4 proposed NFA sites. OU-1 was used intermittently for burial of wastes. Disposal records and interviews with facility personnel indicate specific instances when burial of material occurred. The earliest records of burial date back to 1946. The most recent burial occurred in September 1984. Table 1-1 presents the current disposition of each site, as well as a short description including the nature of items buried at the seven burial sites. The following RI sites are addressed in this FSP:

- Site 6, burial site of 40,037 units of eye ointment
- Site 10, which was discovered during the installation of MW-10, *RI Report* (ref. 5), and consists of buried glass, metal, and trash
- Site 14, municipal waste burial site
- Sites 15, 15.1, and 15.2, burial sites of sodium, sodium phosphate, and chlorinated lime

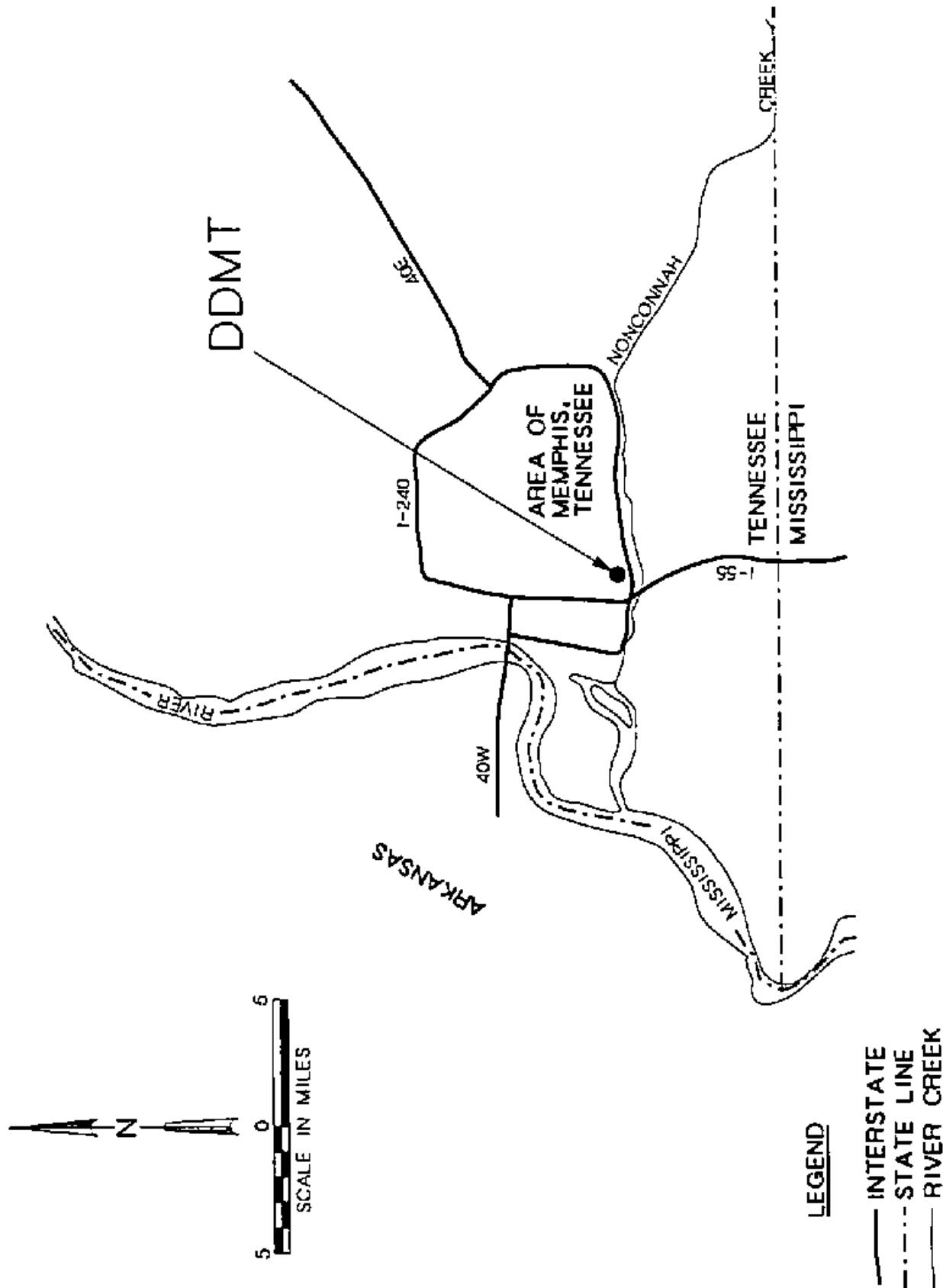


FIGURE 2-1
DDMT LOCATION IN MEMPHIS METROPOLITAN AREA
Defense Depot Memphis, Tennessee

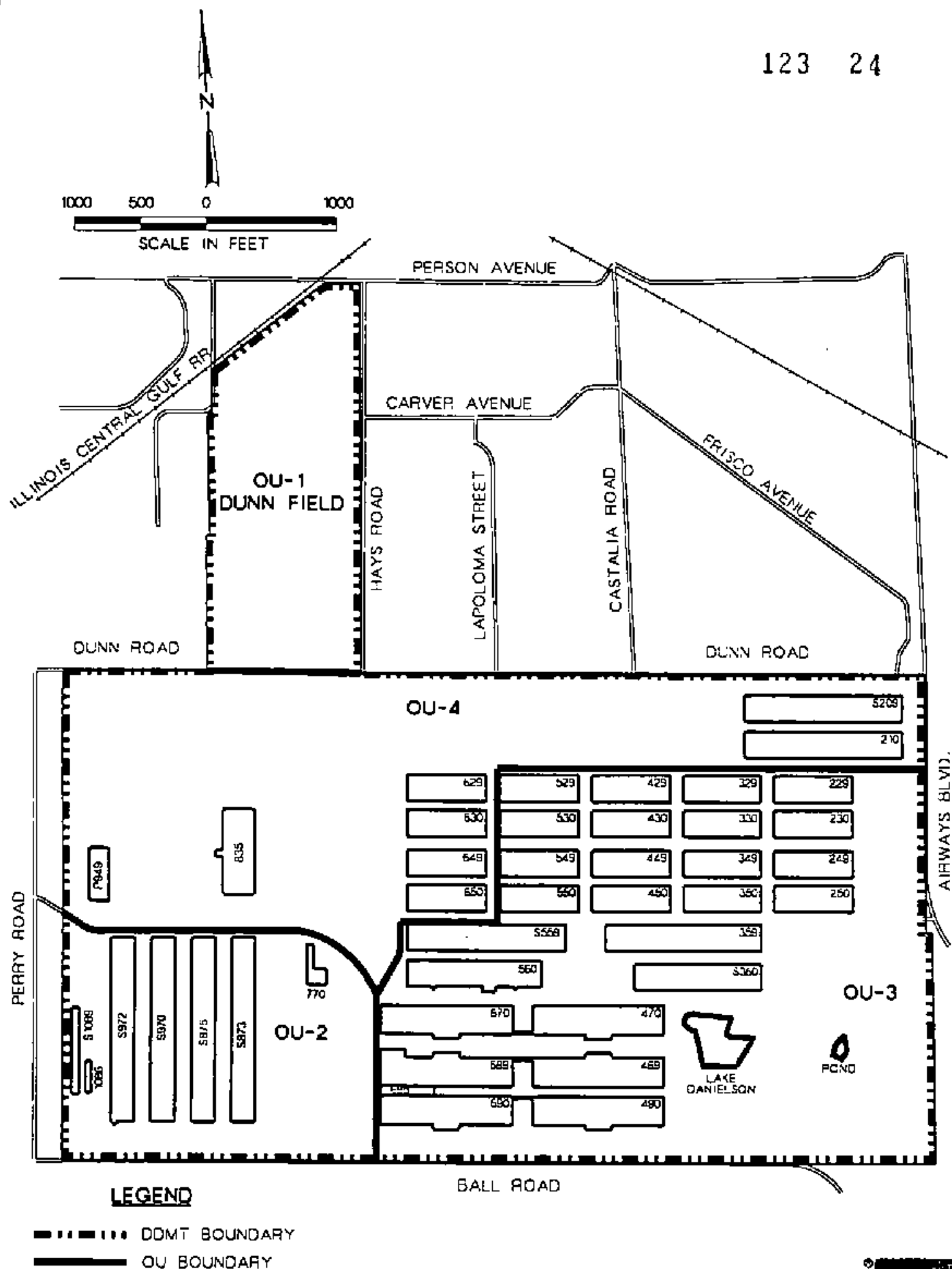


FIGURE 2-2
OPERABLE UNIT LOCATIONS
 Defense Depot Memphis, Tennessee

Source: Engineering-Science, 1993

The burial sites have not been individually investigated. DDMT has recorded the site locations through the years using dimensions from known landmarks, and the sites were summarized in the *RFA Report* (ref. 12). Drawing 1 (located at the end of this document) shows the location and the status of each of the identified sites in OU-1. A brief description of each of the sites, along with this site's status, is also listed in Table 1-1.

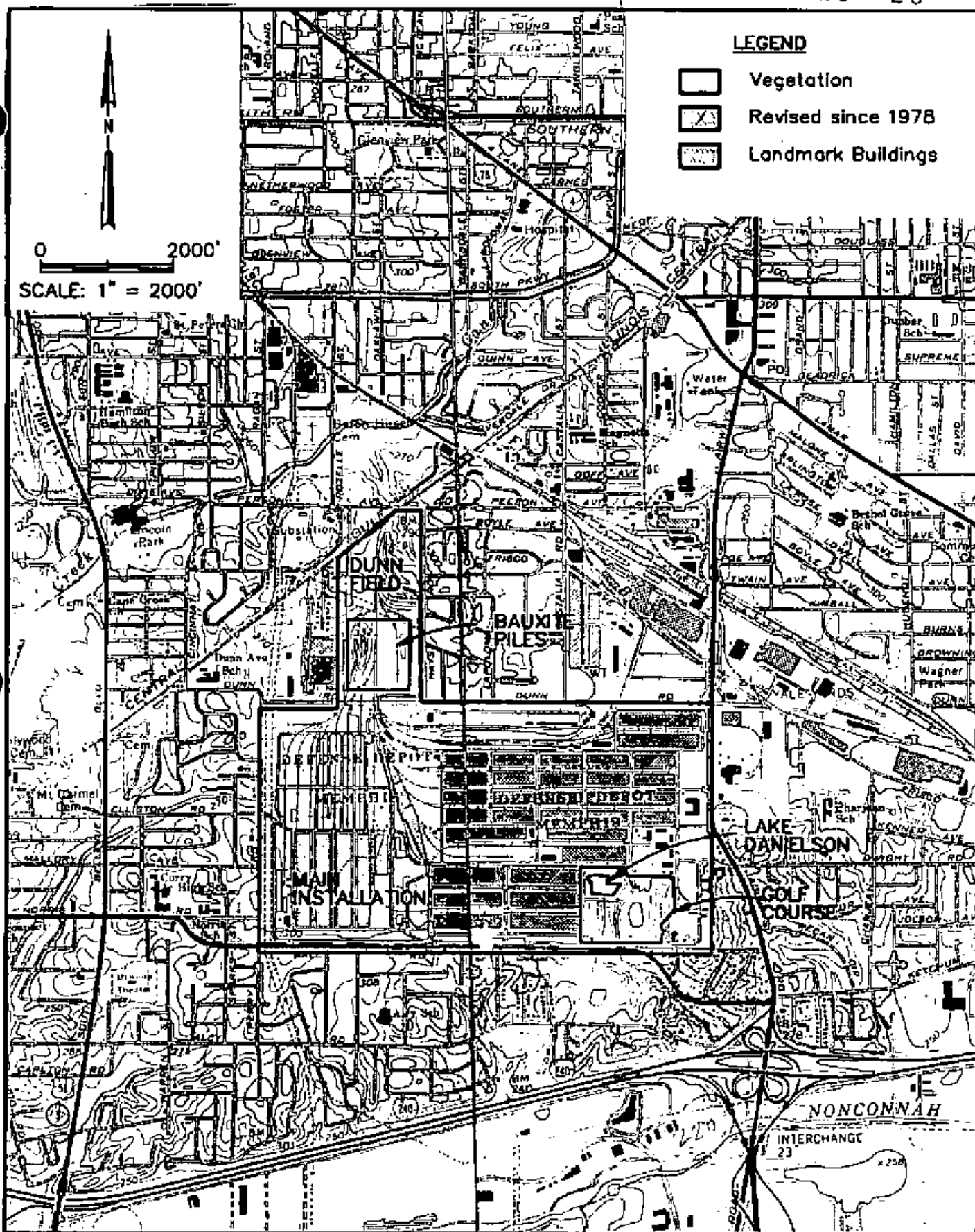
2.3 Geography/Topography

DDMT is located in the southwestern corner of the Memphis area, a few miles north of the Memphis International Airport. The east-to-west flowing Nonconnah Creek lies approximately 3,000 ft south of the installation at its closest point. Cane Creek, which enters Nonconnah Creek from the northeast, is approximately 1,500 ft from the northernmost boundary of Dunn Field. Nonconnah Creek drains into Lake McKellar, a tributary of the Mississippi River.

DDMT's surface features (natural and manmade) and DDMT's relationship to surrounding areas were investigated by onsite visual reconnaissance, U.S. Army Corps of Engineers (COE) historical (comparative) aerial imagery, U.S. Geological Survey (USGS) 7.5 Minute Series Topographic Quadrangle maps, and installation topographic maps prepared by the COE, Mobile District, dated February 1989.

DDMT is divided into two areas, Dunn Field and the Main Installation, each with its own distinct land surface and use-related features. Dunn Field lies just north of the Main Installation and Dunn Avenue, and consists of approximately 64 acres of undeveloped land. Most of Dunn Field is unpaved. About one-half the area is grassed; the remaining area contains crushed rock and paved surfaces. Dunn Field's terrain is level to gently rolling. The land appears to slope to the west from the bauxite piles in the center of the field. Surface elevations range from a low of 273 ft, National Geodetic Vertical Datum of 1929 (NGVD), at the north outfall/installation boundary fence line to 315 ft NGVD in the field's approximate center. Figure 2-3 shows the topographic features of DDMT and surrounding areas.

The Main Installation consists primarily (approximately 57 percent) of developed land. Most of the Main Installation's land area has been graded, paved, and built up. Some of the few remaining unpaved areas are used for open storage of various materials and equipment. The only significant grassed, treed area is the golf course, located in the Main Installation's southeastern sector. The Main Installation's topography is nearly level. Surface elevations range from approximately 316 ft NGVD in the Defense Reutilization and Marketing Office (DRMO) storage yard adjacent to Dunn Avenue to 267 ft NGVD in the low area below Lake Danielson's earthen dam. More detailed information on the geography and topography of DDMT facility can be found in the *Generic RI/FS WP* (ref. 1).



Information describing study area meteorological conditions was obtained from various USGS reports and from the *Climatic Atlas of the United States*, National Oceanic and Atmospheric Administration (NOAA) (ref. 7).

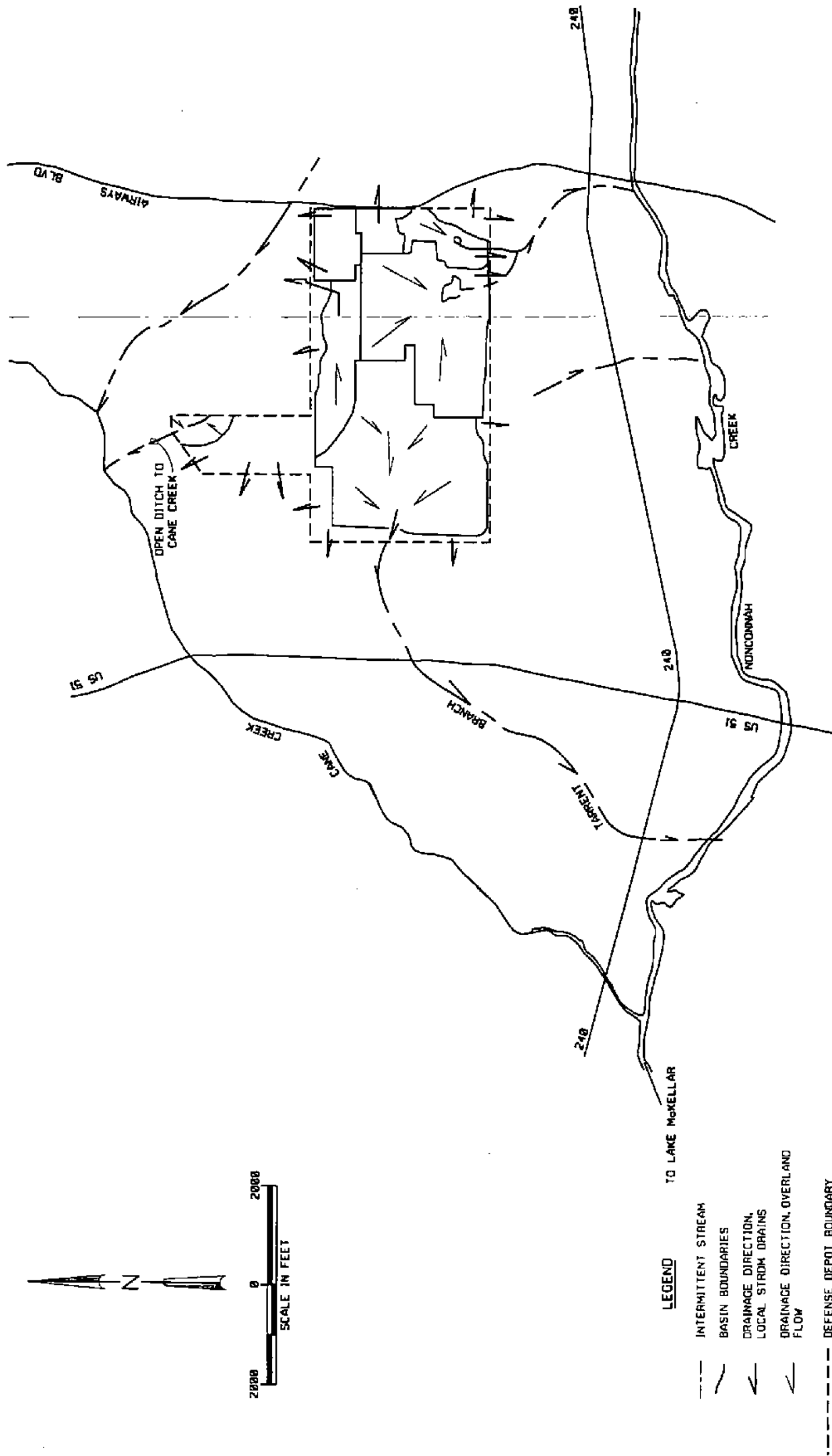
This area of Tennessee has a typical continental type of climate with humid, warm summers and cold winters. The Memphis area receives an annual average of 50 inches of precipitation (30-year period of record). Total annual rainfall was reported to vary from 30.54 inches (1941) to 76.85 inches (1957). Normally, precipitation is heaviest during the winter and early spring. The net annual precipitation (derived from gross annual precipitation less evaporation and runoff) estimated for the Memphis area is 9 inches (ref. 7).

2.5 Surface Water Hydrology

Installation surface drainage is accomplished by overland flow to swales, ditches, concrete-lined channels, and a storm drainage system. Figure 2-4 illustrates the study area's surface drainage features, installation drainage areas, and local streams. There are no year-round surface water features in OU-1.

Most of DDMT is level with, or above, surrounding terrain; therefore, DDMT receives little runoff from adjacent areas. DDMT does receive runoff from the property to the northeast of Dunn Field. Property to the southwest of OU-2 is also at a higher elevation than DDMT, but storm water drainage systems along the roadway capture the majority of runoff. Most OU-1 drainage is achieved by overland flow to the adjacent properties to the north and west. The northeastern quadrant of OU-1 drains eastward to a concrete-lined channel, or to adjacent properties to the north. The concrete-lined channel consists of two separate segments that join approximately 200 ft north of Building 1184. Both channel segments convey adjacent residential neighborhood storm water through the northeastern quadrant of OU-1. The concrete-lined channel directs flow northward to Cane Creek. As discussed in Section 2.3, Cane Creek drains into Nonconnah Creek at a point several miles southwest of DDMT. The Main Installation's surface drainage is achieved by overland flow to a storm drainage system. The primary drainage directions and outfall locations are to the west (Tarrent Branch), to the east (unnamed ephemeral stream), and to the south (unnamed ephemeral stream).

The potential for flooding of DDMT is relatively low. DDMT surface elevations (276 to 316 ft NGVD) are well above the average Mississippi River alluvial valley flood levels (185 to 230 ft NGVD) and are equal to or higher than elevations of adjacent properties. Two permanent surface waters exist at DDMT. The larger body of water is Lake Danielson, which is about 4 acres; it receives a significant amount of installation storm water runoff. The smaller water area is the Golf Course Pond. Overflow from both water bodies eventually discharges into Nonconnah Creek.



SOURCE: MODIFIED FROM DDMT, 1982. DRAFT SPILL PREVENTION, CONTROL AND COUNTERMEASURES PLAN. MODIFIED FROM HARLAND, BARTHOLOMEW & ASSOCIATES, INC., 1988. MASTER PLAN REPORT, DDMT. MODIFIED FROM DDMT, 1992. NPDES STORM DRAINAGE SAMPLING MAP, DRAWING NUMBER 45-90.

Sources: (1) Report 1, 1998

mil-0012, rev 20 MAR-1995

FIGURE 2-4
STUDY AREA SURFACE DRAINAGE
Defense Depot Memphis, Tennessee

CHM/HILL

2.6 Geology

2.6.1 Regional Geology

The Memphis, Tennessee, area straddles two major subdivisions of the Atlantic Coastal Plain Physiographic Province. Figure 2-5 shows a general geologic cross section of the Memphis area. DDMT is situated within a major structural feature termed the Mississippi Embayment, a wedge-shaped, down-warped structure composed of stratified sediments. This area is described as a youthful to mature, belted coastal plain (ref. 3).

Information describing major regional geologic units has been obtained from Wells (ref. 13), Moore (ref. 6), Nyman (ref. 8), and Graham and Parks (ref. 3). The Quaternary and Tertiary strata in the Memphis area are composed of loosely consolidated deposits of marine, fluvial, fluvio-glacial, and deltaic sediments. In Tennessee, unconsolidated sediments (Cretaceous through Quaternary) reach their maximum thickness at Memphis, where they range from 2,700 to 3,000 ft. Further information on regional geology can be found in the *Generic RI/FS WP* (ref. 1).

2.6.2 DDMT Geology

The geology of DDMT was evaluated by reviewing the existing published geologic information and work performed during the RI (ref. 5). On the basis of the soil borings and monitoring wells installed during the RI, cross sections were developed (by others) that illustrate the postulated occurrence, attitude, and relationships of the geologic units encountered. The cross sections are generalizations, and local variations in subsurface conditions should be expected. The strata encountered during the performance of the study conducted by Law Environmental in 1990 (ref. 5) included loess, fluvial deposits, Jackson Formation/Upper Claiborne Group clays (based on interpretation), and what has been interpreted to be the Memphis Sand. Figures 2-6 through 2-9 illustrate the geologic cross sections of DDMT that transect OU-1.

The uppermost geologic unit at or near ground surface in the study area is loess—eolian deposits consisting of brown silty clay, clayey silt, and fine sandy clayey silt. The loess was encountered at all drilling locations. This unit is described as a brown to yellowish, low plasticity silt (ML) or low plasticity clay (CL). Loess tends to retard downward movement of water.

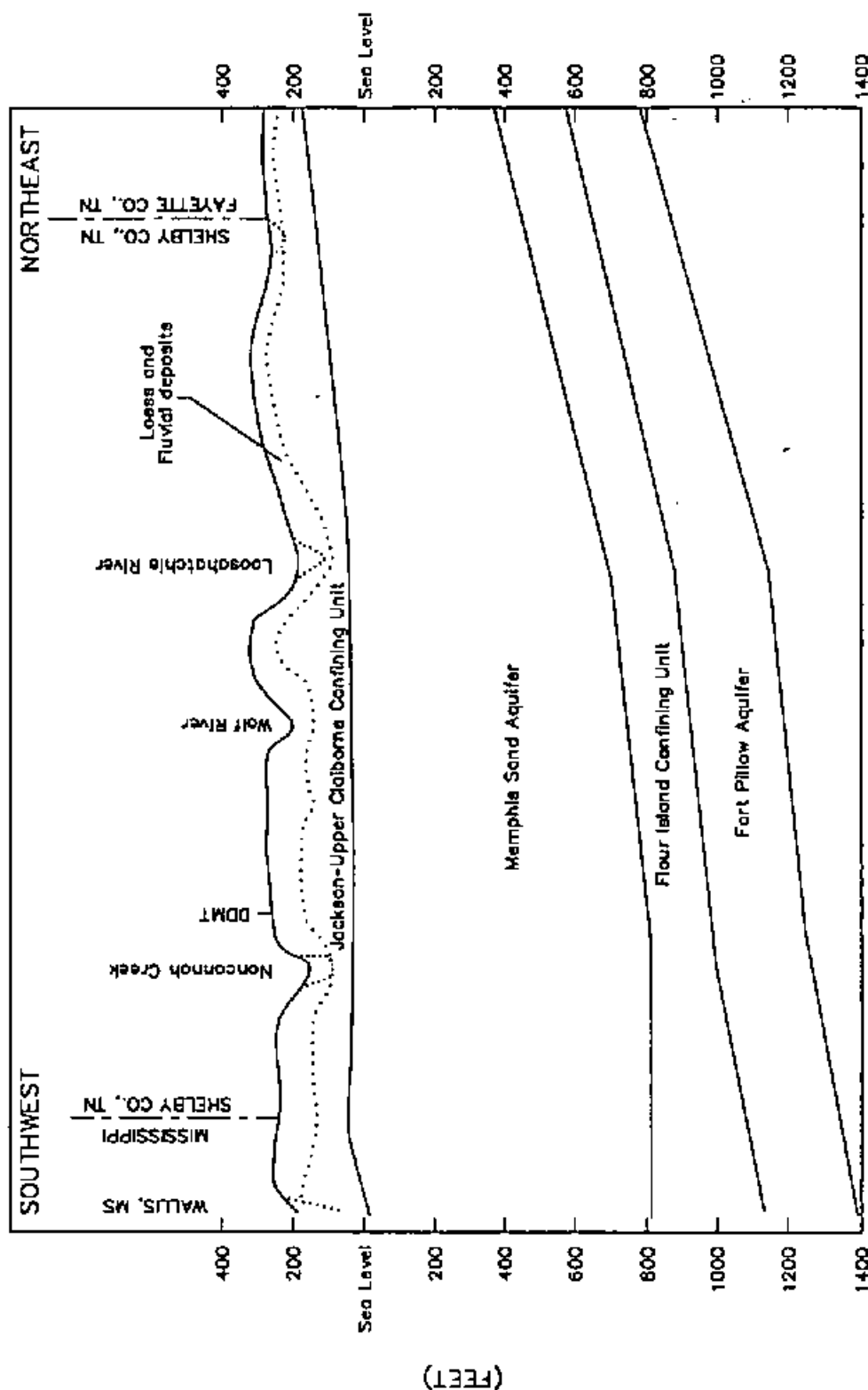
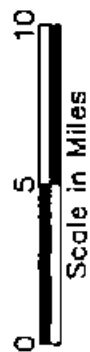
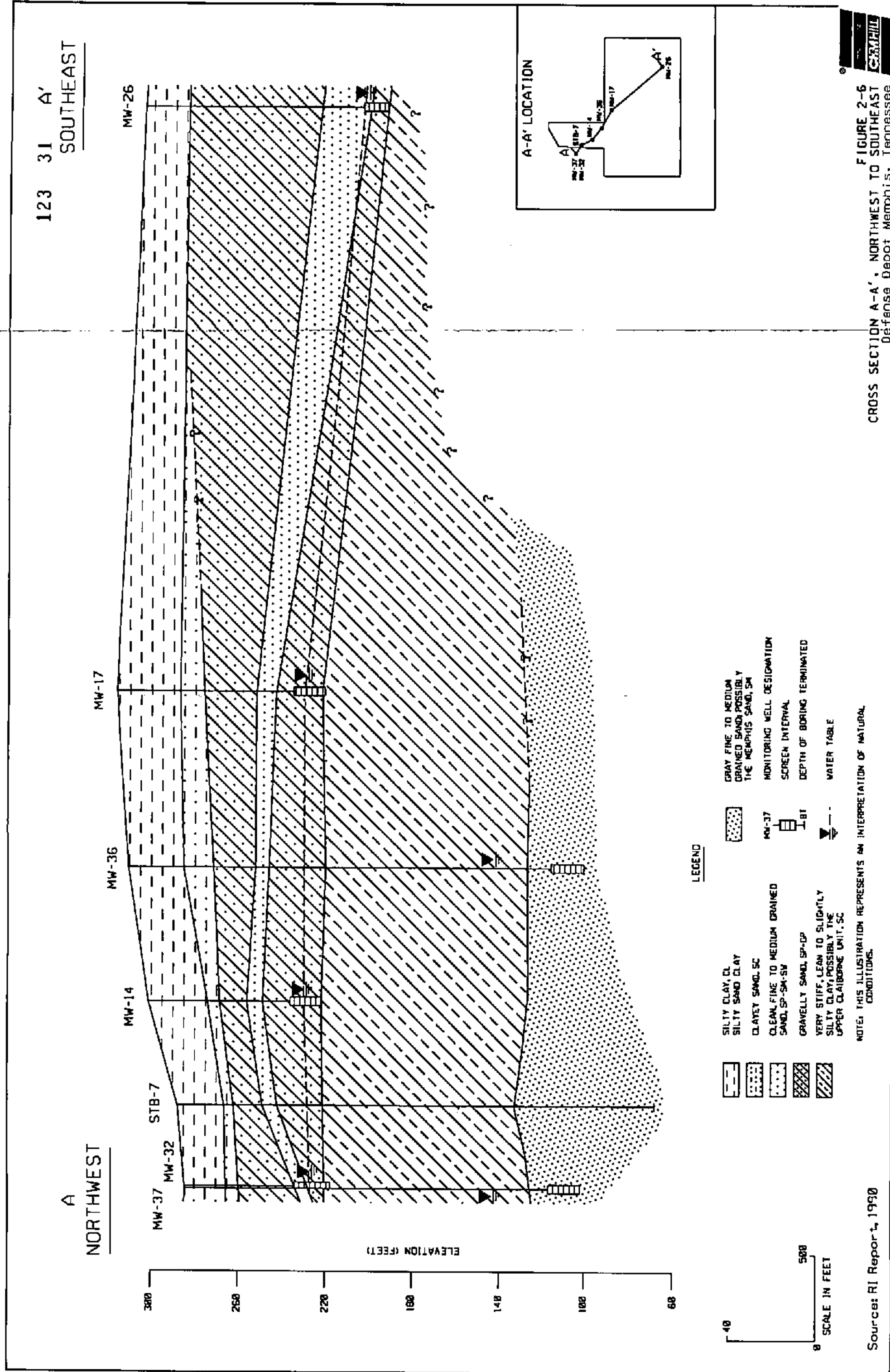


FIGURE 2-5
GENERAL GEOLOGIC CROSS SECTION OF THE MEMPHIS AREA
 Defense Depot Memphis, Tennessee

Source: Parks, 1990

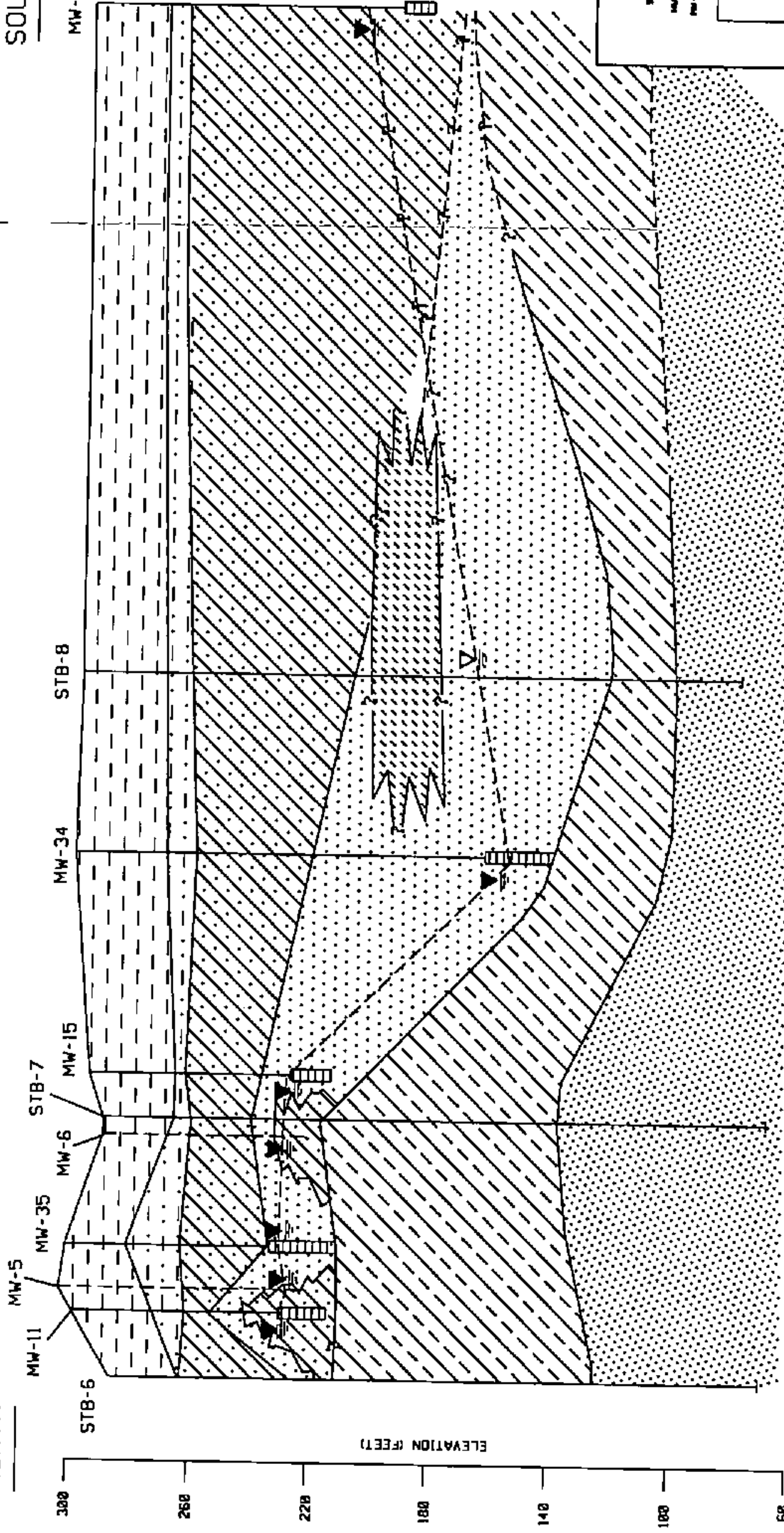


123 32

C'
SOUTH

MW-23

C
NORTH



LEGEND

- | | | | |
|--|---|--|--|
| | SILTY CLAY, CL | | GRAY FINE TO MEDIUM GRAINED SAND POSSIBLY THE MEMPHIS SAND, SN |
| | SILTY SAND CLAY | | SILTY AND FINE SANDY CLAY |
| | CLAYEY SAND, SC | | MONITORING WELL DESIGNATION |
| | CLEAN, FINE TO MEDIUM GRAINED SAND, SP-SM-SV | | SCREEN INTERVAL |
| | GRAVELLY SAND, SP-CP | | DEPTH OF BORING, TERMINATED |
| | VERY STIFF, LEAN TO SLIGHTLY SILTY CLAY, POSSIBLY THE UPPER CLAIRBORNE UNIT, SC | | WATER TABLE |

NOTE: THIS ILLUSTRATION REPRESENTS AN INTERPRETATION OF NATURAL CONDITIONS.

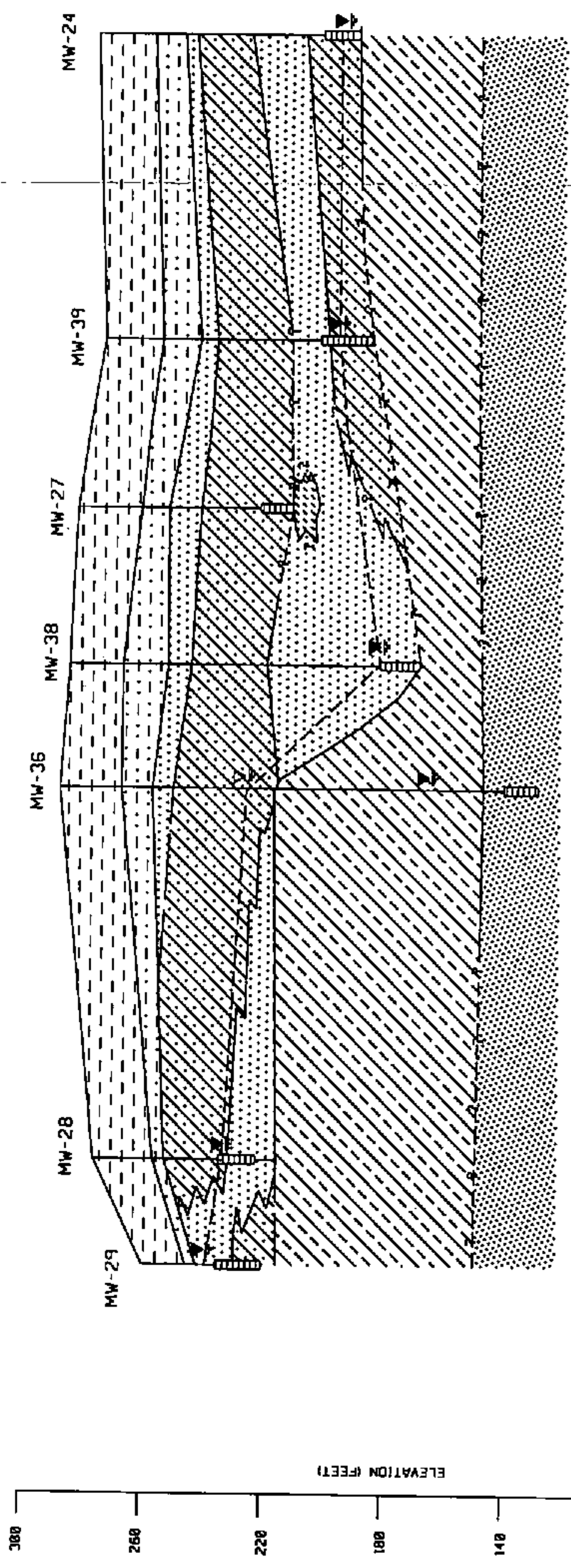
Source: RI Report, 1990

12-0015.dgn 12-001-1995

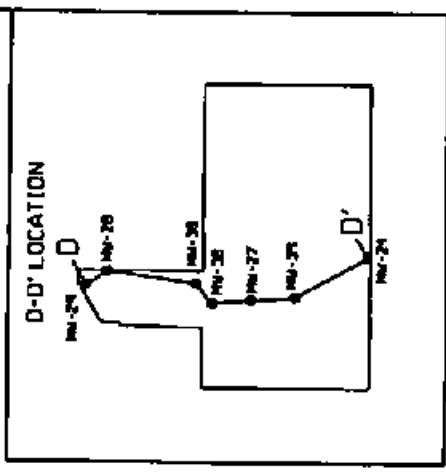
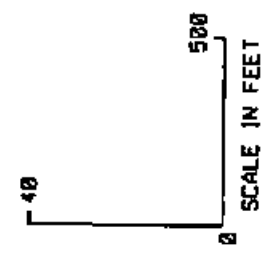
FIGURE 2-7
CROSS SECTION C-C', NORTH TO SOUTH
Defense Depot Memphis, Tennessee

123 33
D'
SOUTH

D
NORTH



- LEGEND**
- | | | | |
|--|--|--|---|
| | SILTY CLAY, CL | | GRAY FINE TO MEDIUM GRAINED SAND, POSSIBLY THE MEMPHIS SAND, SM |
| | SILTY SAND, CL | | SILTY AND FINE SAND, CL |
| | CLAYEY SAND, SC | | MONITORING WELL DESIGNATION |
| | CLEAN, FINE TO MEDIUM GRAINED SAND, SP-SM-SV | | SCREEN INTERVAL |
| | GRAVELLY SAND, SP-GP | | DEPTH OF BORING TERMINATED |
| | VERY STIFF, LEAN TO SLIGHTLY SILTY CLAY, POSSIBLY THE UPPER CLAIBORNE UNIT, SC | | WATER TABLE |



Source: RI Report, 1990

NOTE: THIS ILLUSTRATION REPRESENTS AN INTERPRETATION OF NATURAL CONDITIONS.

FIGURE 2-8
CROSS SECTION D-D', NORTH TO SOUTH
Defense Depot Memphis, Tennessee

123 34

F

NORTH

F'

SOUTH

DDMT INSTALLATION
BOUNDARY

DDMT INSTALLATION
BOUNDARY

CANE CREEK

MONCANA CREEK

MW-36

MW-38

MW-27

MW-39

MW-24

MW-28

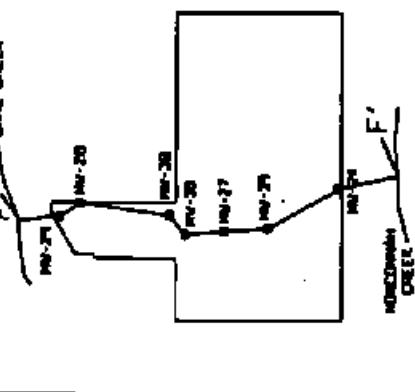
MW-29

ELEVATION (FEET)

300
275
250
225
200
175
150
125
100

F-F' LOCATION

CANE CREEK



LEGEND

- | | | | |
|--|--|--|---|
| | SILTY CLAY, CL | | GRAY FINE TO MEDIUM
GRAINED SAND, POSSIBLY
THE MEMPHIS SAND, SM |
| | SILTY SAND, CL | | MONITORING WELL DESIGNATION |
| | CLAYEY SAND, SC | | SCREEN INTERVAL |
| | CLEAN, FINE TO MEDIUM GRAINED
SAND, SP-SM-SV | | DEPTH OF BORING TERMINATED |
| | GRAVELLY SAND, SP-GP | | WATER TABLE |
| | VERY STIFF, LEAN TO SLIGHTLY
SILTY CLAY, POSSIBLY THE
UPPER CLAIBORNE UNIT, SC | | |

NOTE: THIS ILLUSTRATION REPRESENTS AN INTERPRETATION OF NATURAL
CONDITIONS.

40
0
SCALE IN FEET
500

Source: RI Report, 1990

FIGURE 2-9
CROSS SECTION F-F', NORTH TO SOUTH
Defense Depot Memphis, Tennessee

Fluvial deposits underlie the loess and were encountered at all drilling locations during the RI (ref. 5). The unit is composed of three generalized members that can be traced through the study area:

- Silty clay, silty sandy clay, or clayey sand (upper layer)
- Poorly graded (less than 5 percent silt or clay), fine- to medium-grained sand
- Gravelly sand

Beneath the silty clay, sandy clay/clayey sand are layers of sand and sandy gravel. These layers may alternate. The sand layers range from poorly graded to well-graded, fine- to coarse-grained, very well sorted to poorly sorted quartz grains. The lower sand layers are poorly graded and are tan to white. The sand layers show a coarsening downwards into a gravelly sand, with chert being the primary gravel constituent. The thickness of this unit varies greatly because of erosional features at its top and base. The unit provides water to many domestic and farm wells in rural areas.

Clayey soils that have been interpreted as the Jackson Formation/Upper Claiborne Group were penetrated in three soil borings and two monitoring wells. This unit is represented in the study area by a distinctive stiff gray or orange, low to high plasticity lignitic clay. This member underlies the fluvial deposits and is a regionally significant confining bed for the Memphis Sand Aquifer.

The upper portion of the Memphis Sand Formation was encountered in the same five borings as was the Jackson Formation/Upper Claiborne Group. This Formation is represented in the study area by a gray, very fine-grained, silty sand. It is the principal aquifer providing water for municipal and industrial supplies east of the Mississippi River.

Additional information regarding the geology found at DDMT is available in Section 2.4.5.2 of the *Generic RI/FS WP* (ref. 1).

2.7 Hydrogeology

The Memphis area is located within a region where several aquifers of local and regional importance exist. These aquifers are identified in descending order by their geologic names:

- Alluvium
- Fluvial (Terrace) Aquifer
- Memphis ("500-foot") Sand Aquifer
- Fort Pillow ("1400-foot") Sand Aquifer

The Alluvial Aquifer's distribution is limited to the channels of primary streams; therefore, it does not occur at DDMT. The Fluvial, Memphis Sand, and Fort Pillow Sand Aquifers underlie the installation.

Site-specific hydrogeologic conditions were investigated by physical inspection, test borings, groundwater quality, monitoring well installation, and direct measurement of in-situ hydraulic properties during the RI (ref. 5).

The uppermost hydrogeologic unit encountered at DDMT is the loess. While not usually a water-bearing unit, this material is of interest to this investigation because it tends to limit precipitation infiltration (recharge) to significant underlying aquifers where the loess remains intact and undisturbed. Sandy zones occurring within the loess may become seasonal "perched" water-bearing zones that contain water for short periods after rainfall events. Typically, the perched zone consisted of a fine sandy layer enclosed within the loess, approximately 20 ft below land surface (bls).

Fluvial (Terrace) deposits underlie the loess within the study area. The fluvial deposits form the site's shallow (water table) aquifer. It ranges in thickness from 40 to 131 ft at DDMT. Recharge to this unit is primarily from the infiltration of rainfall (ref. 3). According to the water levels measured in the monitoring wells during the RI (ref. 5), only the base of the unit is saturated. Published seasonal water levels indicate that the groundwater levels fluctuate by several feet.

Water level data from DDMT wells were used to prepare a water table surface map (ref. 5) of the Fluvial Aquifer underlying DDMT (Figure 2-10). This figure represents an interpolation of the water level information obtained from widely spaced monitoring wells and is an interpretation of natural conditions on the date of measurement. Figure 2-11 presents the interpretation of the water table surface within OU-1. A westerly flow is apparent in this portion of the shallow aquifer.

The Jackson Formation/Upper Claiborne Group was encountered at more than half of the monitoring well and soil boring installation locations. The unit is significant because it is a regionally important confining bed that separates shallow water-bearing zones from underlying major aquifers (ref. 8). Where encountered, the elevation of the confining unit's upper surface ranges from 223 ft NGVD at monitoring well (MW)-14 to 118 ft NGVD at stratigraphic test boring (STB)-8. An investigation to evaluate the presence of the confining unit and hydraulic communication (if any) between the water table aquifer and the Memphis Sand Aquifer is planned during the OU-4 RI activities. The continuity and thickness of the confining unit can only be estimated from the available information. The Jackson Formation/Upper Claiborne Group appears to be laterally persistent and fairly uniform in thickness in most of the Dunn Field area. In the southwestern portion of Dunn Field and on the Main Installation, this unit both deepens and thins (see Figure 2-7, specifically STB-7 and STB-8).

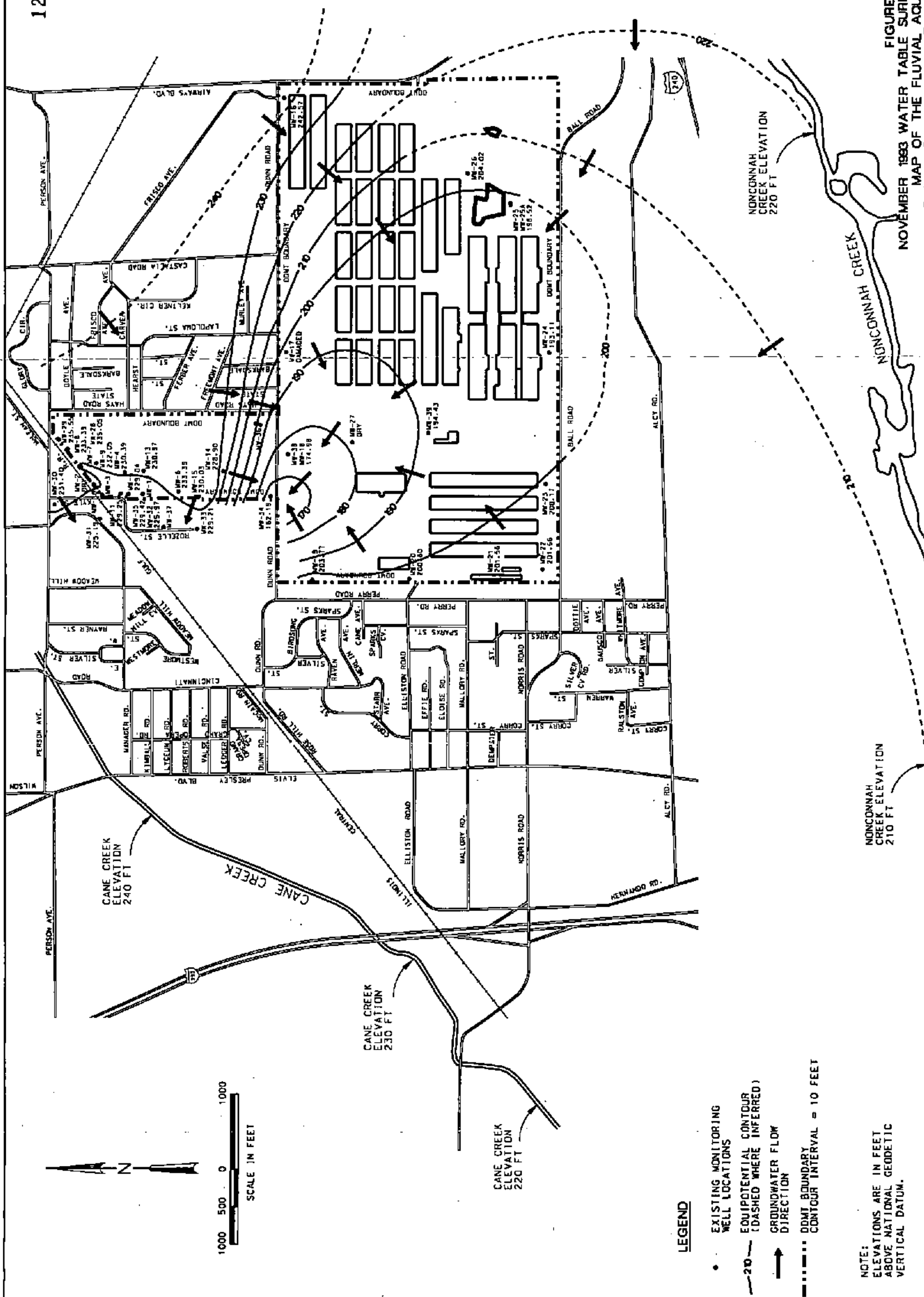
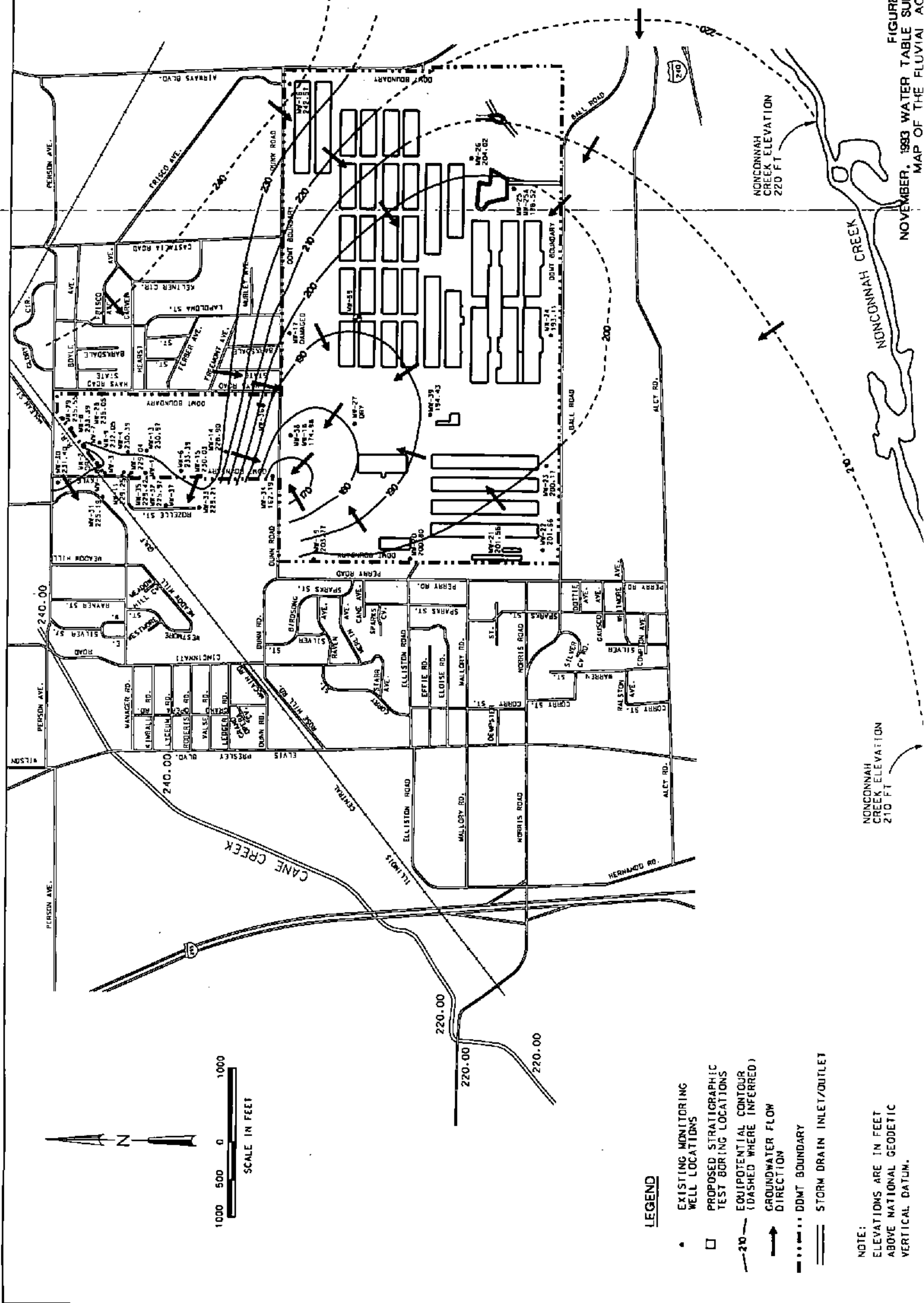


FIGURE 2-9
NOVEMBER 1993 WATER TABLE SURFACE
MAP OF THE FLUVIAL AQUIFER

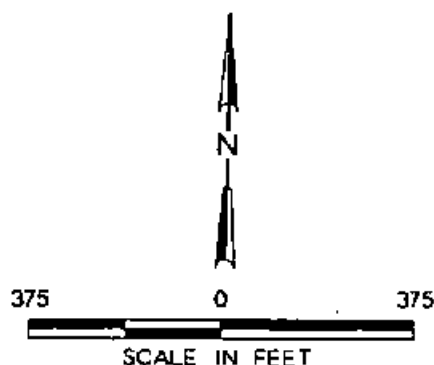


NOTE:
ELEVATIONS ARE IN FEET
ABOVE NATIONAL GEODETIC
VERTICAL DATUM.

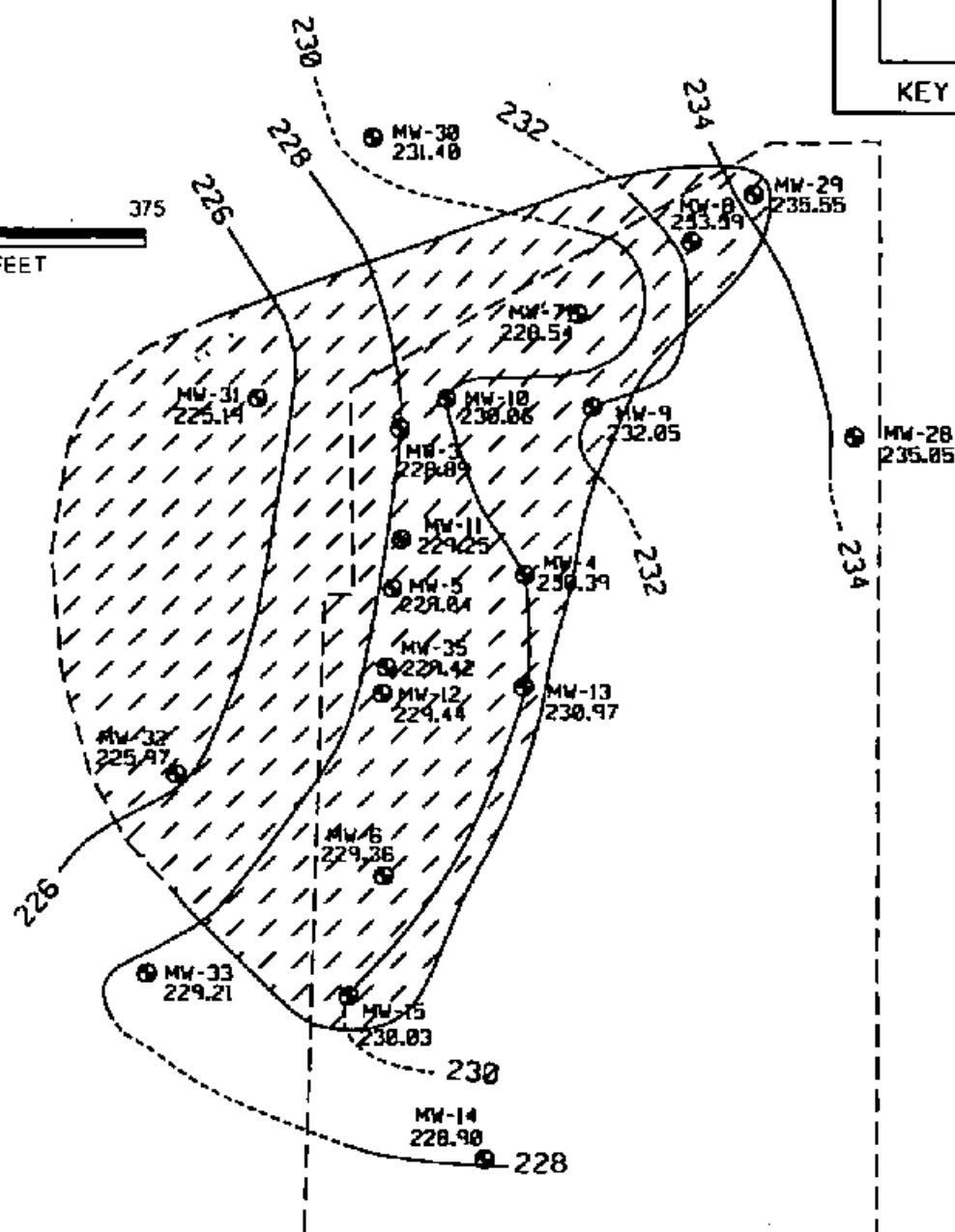
NONCONNAH
CREEK ELEVATION
210 FT

NONCONNAH
CREEK ELEVATION
220 FT

FIGURE 2-10
NOVEMBER, 1993 WATER TABLE SURFACE
MAP OF THE FLUVIAL AQUIFER



123 39



LEGEND

- MONITORING WELL LOCATION
- ISOPLETHS OF EQUAL ELEVATIONS
- - - - - INFERRED ELEVATIONS
- CONTOUR INTERVAL = 2 FEET

-- SHADED AREA REPRESENTS CHLORINATED VOLATILE ORGANIC CONTAMINATION OF GROUND WATER; EXTENT OF CONTAMINATION IS UNKNOWN AND ALL BOUNDARIES OF THE PLUME HAVE BEEN INFERRED.

NOTE: THIS ILLUSTRATION REPRESENTS AN INTERPRETATION OF NATURAL CONDITIONS ON THE DATE OF MEASUREMENT.

FIGURE 2-11
WATER TABLE SURFACE OF FLUVIAL AQUIFER
AT DUNN FIELD, NOVEMBER, 1993
Defense Depot Memphis, Tennessee

Source: ESE 1994

mu1-0019.dgn 13 OCT-1995



The Memphis Sand Aquifer represents the region's most important source of water resources. The Memphis Sand Aquifer is reported to underlie the entire Memphis area. At DDMT, the top of the Memphis Sand is approximately 125 to 150 ft NGVD. The Memphis Sand Aquifer contains groundwater under artisan (confined) conditions. Locally, extensive pumping has lowered water levels considerably. The Memphis Sand Aquifer potentiometric level at MW-36 and MW-37 ranges seasonally from 143 to 146 ft NGVD. Flow in the unit is directed generally westward, toward the Allen Well Field, a major local pumping zone. The Memphis Sand Aquifer is reported to derive most of its recharge from areas where it crops out. The outcrop area forms a wide belt several miles east of Memphis and extends across much of west Tennessee.

The Fort Pillow Sand (or "1400-foot sand") underlies DDMT and the Memphis region at great depth, on the order of 1,400 ft bls. It is reported to average some 200 ft thick in the study area. The unit contains groundwater under artesian (confined) conditions. The Fort Pillow Sand Aquifer potentiometric level in the DDMT area was interpolated to be approximately 180 ft NGVD in the fall of 1985 (ref. 3).

Additional information on the hydrogeology of DDMT, including information on groundwater use and quality, can be found in Section 2.4.6.2 of the *Generic RI/FS WP* (ref. 1).

2.8 Land Use

2.8.1 Surrounding Area

DDMT is located in south-central Memphis in an area of widely varying uses. Most of the land surrounding DDMT is intensely developed. To the north of DDMT are the rail lines of the Frisco Railroad and Illinois Central Gulf Railroad. A number of large industrial and warehousing operations are located along the rail lines in this area. A triangular area immediately to the north of DDMT along Dunn Road also contains several industrial firms. Formerly a residential neighborhood, the area is characterized by small commercial and manufacturing uses with a few single-family residences remaining.

Airways Boulevard is the most heavily traveled thoroughfare in the vicinity and is developed with numerous small, commercial establishments. Businesses along Airways Boulevard are typical of highway commercial districts. Other commercial establishments are located to the north, south, and west of DDMT. Most are small groceries or convenience stores that serve their immediate neighborhoods.

DDMT is surrounded by residential development, including single- and multi-family residences. Numerous small church buildings and schools are scattered throughout the area. Figure 2-12 shows the most current land use information for the area surrounding DDMT. Further details on surrounding land use can be found in Section 2.4.7 of the *Generic RI/FS WP* (ref. 1).

2.8.2 Operable Unit 1

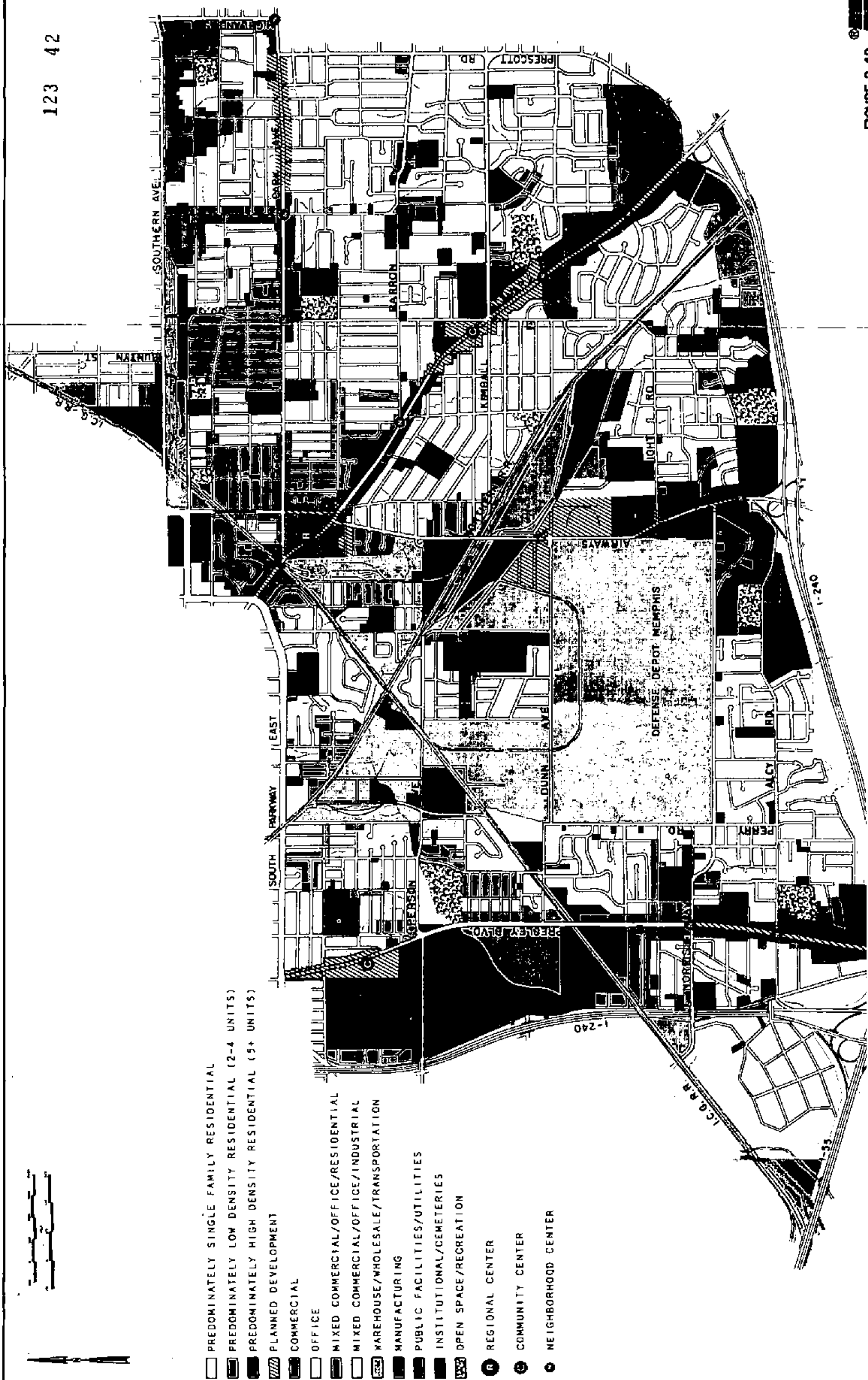
OU-1 is currently used as a storage site for U.S. government strategic stockpiles of bauxite and fluorspar. These are non-toxic mineral reserves. There is a small storage area for reels of electrical wires and miscellaneous metal parts to the east of these mineral storage areas. The areas that are not used for storage or as roadways (gravel) are covered with vegetation. There is evidence of the presence of typical urban wildlife such as squirrels, chipmunks, red foxes, opossums, quail, morning doves, and turtles. No threatened or endangered species are known to inhabit or use DDMT or the area within 1 mile of the facility (ref. 4).

2.9 History and Existing Data

A discussion of the history of activities at the 7 RI sites in OU-1 and a summary of existing data is provided in Section 4 of this FSP. The information is presented on a site-specific basis. Data from previous investigations for OU-1 can be found in the tables located in Appendix B.

2.10 Operable Unit 1 Data Gaps

Using the existing data, knowledge of the site operations, and DDMT records, a review was conducted to assess where data was insufficient to achieve the objectives of the RI/FS process. The review process resulted in the identification of data gaps that need to be addressed during the RI/FS. The primary objectives for conducting field sampling at the OU-1 sites is to characterize potential releases from the site, to assess the nature and extent of soil and groundwater contamination, and to gather data to evaluate the feasibility of remedial actions. Table 2-1 provides a generalization of data needs, existing data, and future sampling requirements.



Source: Memphis and Shelby County Office of Planning and Development.
Map Prepared May, 1983.

FIGURE 2-12
LAND USE
Defense Depot Memphis, Tennessee

<p align="center">Table 2-1 Generalized OU-1 Data Gaps Defense Depot Memphis, Tennessee</p>		
Data Need/Use	Existing Data	Future Data Collection
Identify western extent of plume in Fluvial Aquifer	Offsite wells just west of OU-1 show contamination	Install/monitor additional MWs and groundwater recovery as part of GW IRA.
Identify risks associated with historical burial sites	Limited data to support site-specific recommendation.	Collect surface and subsurface soil samples. Install monitoring wells if site-specific data indicate site is a potential source of GW contamination

Monitoring wells will be installed offsite at the facility for several reasons, including the following:

1. To identify the nature and extent of the contaminant plume west of Dunn Field
2. To assist in developing a potentiometric surface map for the Fluvial Aquifer

Wells also will be installed north of the Dunn Field boundary and on the eastern boundary so that potential migration of contaminants from offsite can be evaluated. A more complete description of the facilitywide groundwater strategy is presented in Section 4.3 of the *OU-4 FSP* (ref. 17).

Subsequent sections of this FSP describe data needs, existing data, and future sampling requirements in detail for each site.

2.11 Summary of Available Information

Various other studies have been performed and documents compiled that provide relevant information to cleanup efforts at DDMT. These technical studies and work plans were performed or prepared in accordance with DLA environmental programs.

The *Generic RI/FS WP* (ref. 1) includes a facility description, background information, findings of previous studies, and potential ways contamination may have reached and affected people. Preliminary information regarding potential ARARs and preliminary cleanup goals is presented.

A *QAPP* and a *HASP* have been prepared. The *QAPP* (ref. 15) describes general sampling procedures and QA/QC procedures to be used so that the quality and the

quantity of the information is adequate to evaluate the nature and extent of the contamination. The *HASP* (ref. 16) was prepared to provide procedures for the health and safety of facility personnel and the general public during the investigation at DDMT.

A geohydrologic study, performed by the U.S. Army Environmental Hygiene Agency (USAEHA), identified Dunn Field as having the potential for groundwater contamination (ref. 10). Groundwater samples were analyzed, using EPA Method 624, for volatile organic compounds (VOCs). The concentrations of all VOCs detected in these wells ranged from 3 micrograms per liter ($\mu\text{g/L}$) to 200 $\mu\text{g/L}$. Trichloroethene was detected in all five wells at levels ranging from 4 $\mu\text{g/L}$ to 150 $\mu\text{g/L}$. Tetrachloroethene also was detected in all five wells; its level of concentration ranged from 3 $\mu\text{g/L}$ to 81 $\mu\text{g/L}$.

Metals, pesticides/polychlorinated biphenyls (PCBs), and base/neutral acid extractable organics also were analyzed, but either were not detected or were detected at levels below the applicable maximum contaminant levels.

Law Environmental conducted an RI/FS that indicated contamination to the Fluvial Aquifer beneath Dunn Field. The RI/FS study focused on the installation, its activities, the environmental setting of the study area, the facility's environmental data collection, sample analyses, data evaluation, and a risk assessment (ref. 5).

Environmental Science & Engineering, Inc. (ESE), performed a groundwater monitoring study in 1993 to assess changes in groundwater quality since the completion of the RI/FS in 1990. The purpose was to evaluate contaminants in the groundwater and to evaluate the extent of migration of these contaminants on and around DDMT (ref. 2).

Engineering-Science, Inc. (ES), performed a pump test in September 1992 (ref. 18) to assess the shallow groundwater zone, to identify and evaluate pump-and-treat alternatives, and to identify technical performance specifications for an interim remedial measure. On the basis of the results of the pump test, ES drew the following conclusions:

- Calculated transmissivity values range from 1.197 feet squared per minute (ft^2/min) to 1.969 ft^2/min , with a mean of 1.385 ft^2/min .
- Calculated hydraulic conductivity values range from $6.0 \times 10^{-2} \text{ ft/min}$ to $9.8 \times 10^{-2} \text{ ft/min}$, with a mean of $6.91 \times 10^{-2} \text{ ft/min}$.
- Calculated specific yield values range from 0.018 to 0.25 with a mean of 0.19.
- The specific capacity of the pumping well is 5.84 gallons per minute per foot (gpm/ft); the efficiency is 83 percent.
- The Fluvial Aquifer is relatively isotropic in the vicinity of the pumping well.

- Values obtained from the pumping test compare well with hydraulic conductivities from silty to clean sands presented by Freeze and Cherry (1979) (ref. 21). Sieve analyses from samples collected in the saturated zone of the Fluvial Aquifer during the RI also indicate that the aquifer is composed of primarily silty and clean sands (Law, 1990).
- The pumping well that was installed for the test appears to be capable of sustaining a pumping rate of approximately 75 gpm, with a corresponding radius of influence of approximately 420 feet.
- The results of the chemical analysis indicate that pumping at 24.3 gpm for 42 hours did not lower concentrations of organic compounds in discharge water.

The radius of influence for the pumping well was evaluated for the test, and the evaluation was noted to have neglected the effect of the groundwater gradient. However, because the groundwater gradient is relatively steep, the capture zone(s), which combines the drawdown effects of groundwater withdrawals and natural groundwater flow gradient, should be evaluated.

The aquifer performance test appears to have been properly conducted and the data are therefore useable. The applicability of the data over a larger area depends on the homogeneity of the aquifer over the intended area of recovery/extent of the contamination. The extent of contamination has not been determined to date; therefore, the applicability of the actual recovery rate(s) of wells has not been evaluated.

An archive search regarding the possible use or disposal of chemical warfare agents (CWAs) on the site was conducted by the COE (ref. 19). The records obtained during this search indicate that only the Dunn Field area was used to destroy or bury conventional ordnance or CWAs. The first known destruction of CWAs was in 1946, with the neutralization/destruction of several German mustard bombs. The last known destruction was the burial of chemical agent identification sets (CAISs) in 1955 or 1956. Between 1946 and 1956, other chemicals associated with the Chemical Warfare Service were also buried. These included impregnite (a clothing treatment that prevents CWAs from affecting the skin), decontamination agent-non-corrosive (DANC), and RH-195. DANC is an organic N-chloroamide compound in solution with 1,1,2,2-Tetrachloroethane. RH-195 is the military designation for the compound 1,3-Dichloro-5,5-dimethyl-hydantoin, which is a white chlorinating powder. Contaminated or low-grade chloride of lime probably was buried in OU-1 as well. Conventional ordnance was destroyed in OU-1 after World War II (ref. 9). The sites investigated in this FSP are not believed to pertain to CWAs; however, a potential exists for encountering CWAs at Dunn Field during the RI field investigation.

The U.S. Army Corps of Engineers, Waterways Experiment Station (ref. 20) conducted a geophysical investigation at the western portion of Dunn Field to delineate the location of

contamination of the Fluvial Aquifer. Magnetic and electromagnetic methods were used to survey six areas.

The surveys performed in the northwestern quadrant confirmed the location of approximately nine disposal sites. Six possible unknown disposal trenches and pits also were located.

One linear anomaly suggesting a possible disposal trench was identified in the southwestern quadrant of Dunn Field. Also, four anomalous areas indicate possible burial sites in the southwestern quadrant.

The results of the geophysical investigation will be used to map sites during the field investigations and to identify additional areas of concern.

TAB

Section 3 - Sampling Strategy for
Operable Unit 1 Remedial Investigation

3.0 Sampling Strategy for Operable Unit 1 Remedial Investigation

This section describes the sampling strategy for OU-1 RI sites. The following information is provided:

- Structure of the investigation
- Data quality objectives (DQOs)
- Data comparisons
- Background data
- Preliminary ARARs and PRGs development
- Risk-based PRGs
- Statistical data comparison

3.1 Structure of Operable Unit 1 Investigation

This section is intended to give a detailed description of the overall strategy for the investigation of each site in OU-1. The approach presented is intended to support a decision to recommend one of the following options:

- Site upgrade (FS, Remedial Design [RD], and Remedial Actions [RA])
- Site downgrade (support NFA)
- Interim Remedial Actions (IRAs) or Early Removals

The structure of the investigation was designed using the observational approach. This work plan is intended to implement RI/FS activities on a cost- and time-effective basis. Field screening procedures and statistical evaluations will be used to facilitate decision making, as defined in Figure 3-1.

3.1.1 Scope

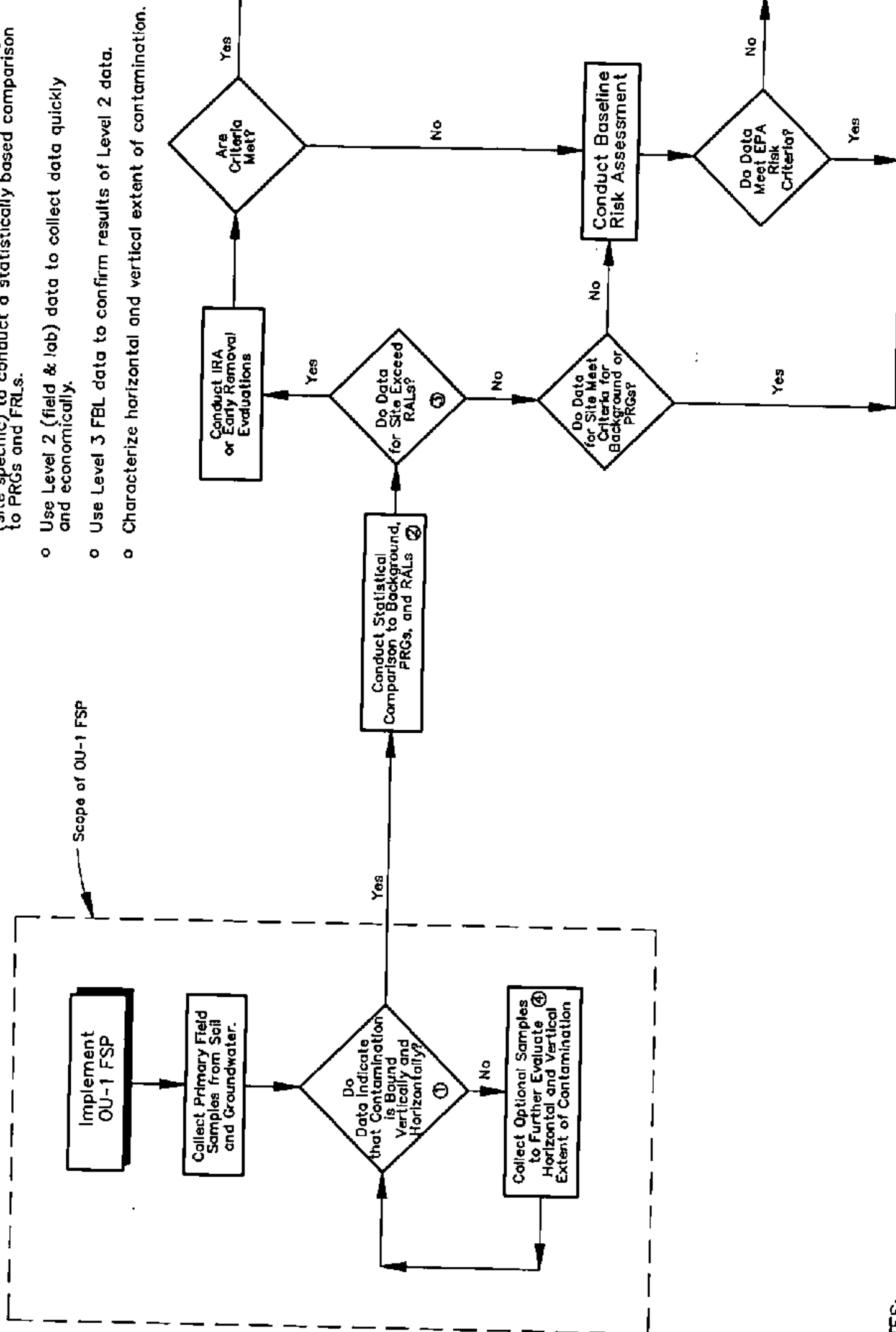
The scope of the field investigation for OU-1 includes soil (surface and subsurface) and groundwater (Fluvial Aquifer) sampling. Monitoring wells will only be installed at sites after an evaluation of results from soil sampling. Groundwater monitoring wells will only be installed if data are needed to assess site-specific remedial actions.

3.1.2 Approach

A phased approach is being used to implement the observational method for the investigation of the RI sites. The RI sites to be investigated as part of this work plan are located in the northwestern quadrant of Dunn Field. Numerous sites are in proximity (see Drawing 1) to the sites to be investigated. In particular, some sites have been identified for ER. Also, a contaminant plume identified in this area of OU-1 extends

- o Collect the specified samples for each exposure pathway (site specific) to conduct a statistically based comparison to PRGs and FRLs.
- o Use Level 2 (field & lab) data to collect data quickly and economically.
- o Use Level 3 FBL data to confirm results of Level 2 data.
- o Characterize horizontal and vertical extent of contamination.

- DQOs - Data Quality Objectives
 TSCL - Tennessee Soil Cleanup Levels
 RHBC - Region III Health Based Criteria
 GWPC - Groundwater Protection Criteria
 FBL - Fixed-Base Laboratory
 FSP - Field Sampling Plan
 FRL - Final Remediation Level
 PRG - Preliminary Remediation Goal
 IRA - Interim Remedial Action
 RAL - Removal Action Level
 FS - Feasibility Study



NOTES:

- ① The bounds of contamination refer to the extent of contamination equal to or less than background and/or PRGs.
- ② Background data set will be established by using criteria identified in the RI/FS WP. Comparison criteria are developed using TSCL, RHBC and GWPC, and other applicable regulatory criteria. These criteria are used as PRGs based on a conservative approach from the standpoint of risk (exposure and assessment criteria). Section 3 of this FSP discusses the comparison criteria. Statistical comparison will be limited by the amount of data collected during the field investigation.
- ③ The RALs will be established based on acute criteria of risks and economic factors.
- ④ Optional work will not be initiated without prior approval of CEHND. Optional samples will be collected only after a field charge request form is signed by CEHND.

westward off the facility property. This groundwater contamination is being addressed with an IRA (groundwater recovery system).

The focus of the approach to the RI site investigation is to evaluate potential ongoing sources of soil contamination, if present. Initial sampling depths are proposed based on initial characterization data needs. Additional samples will be collected to evaluate the nature and extent using the observational approach. Monitoring wells will be installed only when site-specific conditions warrant. Specific conditions may include (but are not limited to) any conditions that may affect the groundwater remedial action selection. The decision for monitoring wells will be made by DDMT, TDEC, and EPA.

The phases for the field activities include field screening (using Levels 1 and 2 data quality) and fixed-based laboratory (FBL) analyses (Levels 3 and 4 data). Four sites at DDMT have been identified for RI in OU-1 and are included in this work plan. Each site is evaluated to identify the quantity and quality of data needed to achieve the objectives of the RI activities. The site-specific sampling activities are included in Section 4 of this report. The proposed decision logic diagram is presented in Figure 3-1. Regulatory numerical criteria used for data evaluation are presented in Section 3.3.

3.1.3 Field Screening

Field screening will provide soil and groundwater data that can be used to effectively investigate the site. The Level 2 data will be coupled with Level 3 analyses. The Level 3 analyses will provide a qualitative evaluation of the Level 2 data, and can be used to the degree to which Level 2 data are comparable to Level 3 to show that Level 2 data can be used for risk assessment. The advantages of this type of assessment, as compared to using only Level 3, include quicker laboratory turnaround time for Level 2 results, ability to change based on site conditions, timely contaminant delineation, and reduced cost.

Section 3.2.2 of the *QAPP* (ref. 15) addresses QA/QC of the sample activities and will specifically describe the differences between Level 2 and Level 3 data. The primary differences that will be addressed include turnaround time, validation process, laboratory QC requirements, and cost. There are four quality levels, 1 through 4. Level 1 analyses may include field pH, photoionization detector (PID) (HNU), and field test kits for specified contaminants. Level 2 analyses include FBL methods for VOCs, semivolatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAHs), and priority pollutant metals (PPMs) on a 7- to 10-day turnaround basis. Level 3 analyses include FBL methods for VOCs, SVOCs, PAHs, and PPMs, with QA/QC analyses. Level 4 analyses will not be conducted at this time. The laboratory may produce Level 4 data package deliverables in the future.

3.1.4 Fixed-based Laboratory Procedures

Because of the wide variety of sites to be investigated, a complex array of analyses will be conducted for FBL analyses. On the basis of known contaminants at each site, existing data, and level of uncertainty, each field sample collected will be screened for one or more target compounds using Level 2 protocol. Approximately, but no less than, 10 percent of the field samples will be sent to an offsite laboratory for confirmational analyses. Approximately, but no less than, 10 percent of the Level 3 data will be submitted for target compound list/target analyte list (TCL/TAL) analyses, and at a minimum, one sample from each site will be analyzed for the TCL/TAL parameters. The list of analytical methods that will be used for offsite analysis is presented in Section 4 of the *QAPP* (ref. 15). The selection of the location of confirmatory samples (Level 3), based on the results of Levels 1 and 2 data, will be made by the field team leader (FTL) according to the criteria defined in Sections 3.2 and 3.3 of this document.

3.1.5 Remedial Actions

Sites may be upgraded to FS, RD, or RA, or an IRA may be conducted while the final remedy is being developed to expedite remediation; or, a removal action may be performed if appropriate. The RA evaluation will be conducted as a parallel effort to the field effort at DDMT.

3.1.6 Primary and Optional Activities

Primary field activities include field sampling for surface and subsurface soil and groundwater to estimate the horizontal and vertical extent of contamination. The analytical soil data, in comparison to PRGs, and the background data set will be used to evaluate the need for additional field sampling. The background data set collection is discussed in Section 5.3.2 the *Generic RI/FS WP* (ref. 1). Additional investigation may be necessary to support risk-based decisions, to develop information needed to select an appropriate RA, or to further characterize the extent of potential contamination. Optional field work could include additional surface or subsurface soil sampling, surface water and sediment sampling, well installation, and well sampling.

By using the field analytical data, DDMT can implement optional activities to achieve the objectives of the RI and DQOs. By using the optional activities in this manner, work can be conducted during a single field event to prevent remobilization. A field change request form will be instituted to document the description of optional activities, the reasons for implementing the change, and authorization to proceed with optional activities.

Facilitywide groundwater strategy is discussed in Section 4.3 of the *OU-4 FSP* (ref. 17). The strategy is presented in the *OU-4 FSP* to achieve a concise presentation of strategy and to prevent redundancy.

3.2 Data Quality Objectives

DQOs are qualitative and quantitative statements that specify the quality of the data required to support the decision-making process during the sampling activities. DQOs are developed based on the intended final use of the data. Specific objectives of the RI field sampling effort are divided into the following two parts: primary field work DQOs, to assess the magnitude of a contaminant release to surface and subsurface soils; and optional field work DQOs, to assess whether contaminant release has occurred to groundwater and to assist in data collection to support the decision-making process. The general DQOs guiding the field investigation process are the following:

- Collect soil samples (surface and subsurface) that are representative of actual site conditions.
- Provide reliable data results supported by QC measures implemented during sampling and analysis.
- Use Level 1 screening assays to aid in site sample selection activities.
- Use Level 2 FBL analytical methods to expedite the decision-making process and to collect data quickly and economically. Use analytical techniques for Level 2 data that provide quality data for use in the risk assessment.
- Conduct sufficient Level 3 FBL analyses to support confirmation of Levels 1 and 2 data and to support risk-based decisions for the NFA alternative.
- Compare the levels of contamination at sites to applicable regulatory levels and calculated risk-based levels, so that the appropriate recommendations can be developed.
- Provide laboratory support to produce Level 4 data to provide legally supportable documentation for decisions (if needed).

As a result of a phased field investigation process, specific DQOs for each phase are necessary. These phase-specific DQOs are presented in Table 3-1.

Table 3-1 Specific DQOs for OU-1 RI Sites Defense Depot Memphis, Tennessee	
Primary Field Work DQOs ¹	Optional Field Work DQOs ²
Conduct proposed soil sampling at RI sites to evaluate the magnitude of a contaminant release as a result of historical site activities. Collect sufficient data (nine samples per exposure pathway) to support a statistical-based data comparison and to support a baseline risk assessment. Collect data to support the IRA evaluation.	Collect groundwater data upgradient and downgradient of the site to assess whether a release to groundwater as a result of site activity has occurred. Install additional soil borings to collect additional data, if necessary, to characterize the horizontal and vertical extent of contamination.
¹ DQOs that are achieved using the primary sampling activities presented in Section 4 of this FSP. ² DQOs applicable if a potential contaminant release to groundwater has been identified or if contaminants in soil media are not evaluated during the primary field activities.	

3.3 Data Comparisons

Surface soil, subsurface soil, and groundwater data will be collected during the primary field work investigation at OU-1. The data will be collected at locations identified in Section 4 of this report. Locations have been selected where current data show that the highest probability of contamination exists. Once the RI field investigation is underway, data will be collected through the use of the Level 2 data quality, thus expediting the turnaround time (7 to 10 days). Four data comparisons will be conducted during the RI activities as part of the ongoing investigation, as follows:

- Individual data points for Level 2 data will be compared to the PRGs (see Sections 3.5 and 3.6) for organic constituents. Contaminants that exceed the PRGs are considered to be representative of contamination for a site. For inorganic constituents, Level 2 data will be compared to the background data for each data point first, then to PRGs. (Background data are discussed in Section 3.4 of this document.) Therefore, when attempting to estimate the horizontal and vertical extent of contamination, additional soil borings may be necessary when organic constituents exceed PRGs or when inorganic constituents exceed background and PRGs.
- Level 2 data will be compared to Level 3 data (23-day turnaround time) to assess the data usability. This comparison will be conducted after the Level 3 data have been analyzed by the laboratory and validated. Section 3.2.2.2 of the *QAPP* (ref. 15) discusses the approach to assessing Level 2 data quality usability. The goal is to collect Level 2 data of sufficient quality to be used for statistics and for baseline risk assessment (BRA).

- Level 2 data will be compared to removal action levels (RALs) for each data point. The RALs are discussed in Section 3.5.
- The final data comparison will be conducted after the field investigation is complete. This data comparison will use a statistical approach to compare the data for a site to PRGs and RALs. This approach is presented in Section 3.6.

3.4 Background Data

Background data for groundwater, surface water, soil (surface and subsurface), and sediment will be collected during the screening and RI field work activities. The approach to collecting this data is presented in Section 5.3.2 of the *Generic RI/FS WP* (ref. 1). The background data set will be used to establish individual background data numerical criteria for each constituent of concern. The method for establishing this background data numerical criteria is presented in Section 5.3.2 of the *Generic RI/FS WP* (ref. 1). Individual parameters for each biased sampling location will be compared to the background data set to evaluate whether a contaminant release has occurred. If the data do not exceed the background data, the site will be recommended for NFA. Only the parameters that exceed background data will be considered for further investigation using the optional field activities (additional borings, wells, and ERs).

3.5 Preliminary Identification of Applicable or Relevant and Appropriate Requirements and Preliminary Remediation Goals

3.5.1 Introduction

The purpose of this section is to summarize information used in the scoping phase of DDMT projects on issues relating to compliance with ARARs, including identification of PRGs. This information guides the development of appropriate sampling and analysis plans and ER actions, or facilitates the development of a range of appropriate remedial alternatives and can focus selection on the most effective remedy. Terms used in this section are defined in Table 3-2.

The procedures for identification and evaluation of ARARs and PRGs are presented in several important sources, particularly the following:

- The NCP, specifically 55 FR 8741-8766 for a description of ARARs, and 8712-8715 for using ARARs as PRGs; also 53 FR 51394
- CERCLA Compliance Manuals (EPA 1988 and 1989)

Table 3-2
ARARs and PRGs Definitions
Defense Depot Memphis, Tennessee

Term	Definition
Applicable or Relevant and Appropriate Requirements (ARARs)	"Applicable" requirements are those clean-up standards, standards of control, and other substantive environmental protection requirements, criteria, or limitations promulgated under federal, state, or local law that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) site. "Relevant and appropriate" requirements are those cleanup standards which, while not "applicable," address problems or situations sufficiently similar to those encountered at the CERCLA site that their use is well-suited to the particular site. ARARs can be action-specific, location-specific, or chemical-specific.
Final Remediation Levels (FRLs)	Chemical-specific cleanup levels are documented in the Record of Decision (ROD). They may differ from preliminary remediation goals (PRGs) because of modifications resulting from consideration of various uncertainties, technical and exposure factors, as well as all nine selection-of-remedy criteria outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).
Preliminary Remediation Goals (PRGs)	Initial cleanup goals that (1) are protective of human health and the environment, and (2) comply with ARARs. They are developed early in the process based on readily available information and are modified to reflect results of the baseline risk assessment. They also are used during analysis of remedial alternatives in the remedial investigation/feasibility study (RI/FS).
Risk-based PRGs	Concentration levels set at scoping for individual chemicals that correspond to a specific cancer risk level of 10^{-6} or a Hazard Quotient/Hazard Index (HQ/HI) of 1. They are generally selected when ARARs are not available.
Screening Risk-based PRGs	Conservative risk-based estimates and guidance concentrations to be used for site and pathway screening. Lower values than typically estimated after a baseline risk assessment are presented—values correspond to an HQ/HI of 0.1.
Remedial Goal Options (RGOs)	Remedial goal options are typically developed during the baseline risk assessment to present risk managers with a range of possible target FRLs.
Removal Action Levels (RALs)	Concentrations that trigger consideration of removal actions based on the potential for acute or long-term chronic effects.

- *Risk Assessment Guidance for Superfund: Volume 1—Human Health Evaluation Manual. Part B, Development of Risk-Based Preliminary Remediation Goals. EPA, 1991 (RAGS Part B)*

Three types of federal and state ARARs have been identified as described below:

- **Chemical-specific**—Health or risk management-based numbers or methodologies that result in the establishment of numerical values for a given media that would meet the NCP "threshold criteria" of overall protection of human health and the environment and compliance with ARARs. The development and presentation of these "threshold criteria" are a major focus during this initial phase because of their role in the development of the specific sampling plans and their use in initial data interpretation.
- **Location-specific**—Restrictions placed on the concentrations of hazardous substances or the conduct of activities solely because they are in special locations (such as wetlands).
- **Action-specific**—Usually technology or activity-based requirements or limitations on actions taken with respect to hazardous waste.

The detailed ARAR and PRG information provided in Section 3.5 of the *Generic RI/FS WP* (ref. 1) presents initial guidelines. This information does not establish that cleanup to meet these goals is warranted. As more information is obtained about all OUs and as remedial alternatives are considered, federal and state requirements will be narrowed to those that are potential ARARs for each alternative.

3.5.2 Chemical-specific Threshold Concentrations

Threshold criteria were developed for each media of potential concern, specifically groundwater, surface water, soil, and sediment. These include ARAR-based PRGs, guidance values that are "to be considered," and screening risk-based PRGs.

The screening PRGs represent the most conservative approach to the interpretation of the site data. These data are intended for use in screening sites to evaluate the appropriate disposition of the site.

The screening PRGs were developed from information provided in Risk Assessment Guidance for Superfund (RAGS) Part B and guidance from EPA Region IV.

Region III publishes screening PRGs, and the table is updated semiannually. Region III PRGs were used for guidance in developing the PRGs. However, the screening values

for DDMT are more conservative than the Region III values. The following factors were considered and led to the development of these conservative screening PRGs for DDMT:

- Presence of multiple contaminants
- Pathways not considered in the published values (soil-to-groundwater pathways)
- Potential ecological effects
- Appropriate land-use assumptions

Remedial goal options (RGOs), consistent with EPA Region IV guidance, will be developed during the RI process and will provide a more realistic basis for the development of final remediation levels (FRLs). Also, a more detailed discussion of media-specific PRGs and the PRG values are presented in Section 3.6 of the *Generic RI/FS WP* (ref. 1).

3.5.3 Action-specific ARARs

Action-specific ARARs usually are technology- or activity-based requirements or limitations on actions taken with respect to hazardous wastes, or requirements to conduct certain actions to address particular circumstances at a site. Remedial alternatives that involve, for example, closure or discharge of dredged or fill material may be subject to ARARs under RCRA and the Clean Water Act, respectively. A detailed media-specific explanation of action-specific ARARs is presented in Section 3.5.3 of the *Generic RI/FS WP* (ref. 1).

3.5.4 Location-specific ARARs

Location-specific ARARs generally are restrictions placed on the concentration of hazardous substances or the conduct of activities solely because they are in special locations. Some examples of special locations include floodplains, wetlands, historic places, and sensitive ecosystems or habitats. Discussions with TDEC, Division of Solid Waste Management, have indicated that the state is not aware of any natural resources for which it acts as a trustee that are potentially threatened or damaged as a result of past or current waste disposal practices conducted at DDMT. Furthermore, a search for possible location-specific ARARs was conducted during the RI (ref. 5), and no federal, state, or local natural resources were found to be near the site. Before the completion of the final RI/FS report(s), a CERCLA 104B.2 Notification Form will be submitted to the Department of Interior (DOI) by DDMT to evaluate whether the DOI is a trustee of any natural resources that may be threatened by a release of hazardous substances from the site.

3.6 Risk-based Preliminary Remediation Goals

The PRGs developed for use in DDMT work plans are designed to be protective using conservative assumptions. In this way, they may be used for screening sites where a focused investigation is conducted to select locations that represent "worst-case conditions," and decision makers can be confident that chemicals reported below these concentrations would result in acceptable risks at the site after a BRA. For risk-based PRGs, the following general assumptions are used:

- Residential land use
- Target risk level (TRL) of 10^{-6} ; Target hazard index (THI) of 0.1

The current land use is industrial, and many areas of the facility are located where worker exposures would be relatively infrequent. Risk estimates based on the TRL of 10^{-6} or THI of 0.1 would be protective if several chemicals were present below the specified concentrations. However, under conditions where 10 or more chemicals were reported, additional review would be required. More detailed information regarding PRG development and calculation can be found in Section 3.6 of the *Generic RI/FS WP* (ref. 1).

3.7 Statistical Data Comparison

If a biased sample (assumed to represent potential "hot spot" or high concentration locations) shows concentrations exceeding the conservative screening PRGs (but below the RALs), it is possible that the average concentration over the designated exposure area would not represent a potential for adverse effects. Statistical sampling and comparison of estimates of the average concentration would meet the requirements to demonstrate acceptable risk-based levels.

The exposure concentrations used in risk assessments reflect the arithmetic average of the concentration that would be contacted over the exposure period. Although this concentration may not reflect the maximum concentration that could be contacted at any one time, it is regarded as a reasonable estimate of the concentration likely to be contacted over time, because it is not reasonable to assume long-term contact with the maximum concentration. Providing that no "hot spots" (areas of high concentration relative to other areas of the site or elevated above a RAL) are identified, risk estimates are based on the average concentration (RAGS, EPA, 1989). However, because of the uncertainty associated with any estimate of soil concentration, the 95 percent upper confidence limit (UCL95) of the arithmetic average is used for this estimate. The PRGs are based on the average exposure below the estimated concentration, and therefore, these would also be compared with a statistical estimate of the average.

This method is also documented in EPA guidance for statistical comparisons. For example, methods for testing whether soil chemical concentrations at a site are

statistically below a cleanup standard or ARAR are presented in *Methods for Evaluating the Attainment of Cleanup Standards, Volume 1: Soils and Solid Media* (ref. 14). Several approaches are identified, including comparison of the estimate of the mean (UCL95) with the target concentrations.

3.7.1 Statistical-based Samples

Samples of surface and subsurface soil for each site will be collected. The collection of nine samples is recommended based on the minimal number of samples that can be used to estimate the UCL95. This number provides information regarding the chemical distribution and sufficient data to prevent default to the maximum concentration based on a limited data set.

The objective of the sampling program is to allow a set of samples collected from a site to be generalized to the entire site; that is, to be used as a data set. This form of systematic (probabilistic) sampling is proposed to optimize the program objectives to assist in reaching conclusions regarding a site as efficiently as possible, while maintaining a degree of confidence that the site has been effectively sampled.

TAB

Section 4 - Sampling Plan

Section 4 describes the activities that will be conducted during the field investigation at DDMT. This section discusses activities that will support the investigative strategy described in Section 3.0 of this report. For each site, the following information is provided:

- Site description
- Site history
- Existing sampling data
- Potential contaminants of concern (PCOCs)
- Data gaps and site-specific DQOs
- Soil sampling and analysis
- Groundwater sampling and analysis

Tables 4-1 and 4-2 (located at the end of this section) show the number of proposed soil and groundwater samples for each site. Additionally, these tables show the parameters and data quality for each proposed sample.

4.1 Site 6—Eye Ointment Burial Site

On November 2, 1955, approximately 40,000 units of eye ointment of an unknown size were disposed of at this site. Site 6 is approximately 85 ft south of the north fence and 100 ft northeast of the Methyl Bromide Burial Site (Drawing 1).

4.1.1 Site History

Although the name of the ointment was not recorded, it should be taken into consideration that the ointment was a medication prescribed for the eye, which is one of the most delicate organs of the human body, and is not known to be hazardous or toxic in nature. The ointment was likely an antibacterial agent combined in a petroleum base. Aerial photographs taken during 1965 show ground disturbances where the disposal records indicate that the burial of the eye ointment occurred. Also, chemical warfare agents have been buried in Sites 1 and 9, in reasonable proximity to the site.

4.1.2 Existing Sampling Data

No sampling data appear to exist for this site. On the basis of the data provided for this site and the known potential for contamination at the facility, the PCOCs are VOCs, SVOCs, metals, and PAHs. Thiodyglycol is also a PCOC because it is a mustard breakdown product and because of the reasonable proximity of chemical warfare sites.

4.1.3 Data Gaps and Site-specific DQOs

The following summary chart identifies the major data gaps and DQOs for Site 6.

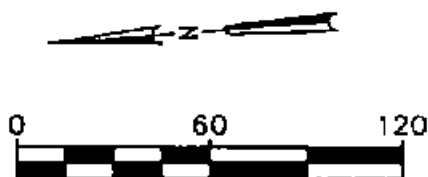
Site 6—Data Gaps and DQOs Defense Depot Memphis, Tennessee	
Data Gaps	DQOs
No data to assess whether a release has occurred to the surface or subsurface soils	<p>Collect surface and subsurface soil samples to assess the presence of a contaminant release.</p> <p>Use Level 2 data to expedite the field investigation process.</p> <p>Use Level 3 data to confirm Level 2 data.</p> <p>Collect a minimum of 1 TCL/TAL sample at a field-selected location.</p>

4.1.4 Soil Sampling and Analysis

The sampling rationale at this site is based on a biased approach to meet the DQOs. The objective of the surface and subsurface soil samples (shown in Figure 4-1) is to confirm the presence of a contaminant release.

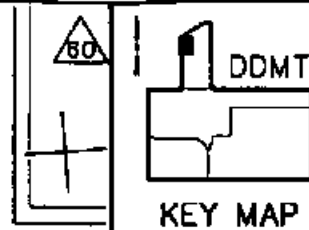
One soil boring will be installed in the center of the site to evaluate whether a subsurface release has occurred. Samples will be collected at depths of zero to 12 inches, 5 ft, 10 ft, and 20 ft. Three additional surface soil samples (for a total of 4) will be taken to evaluate whether a release has occurred. The following presents a summary of the quality and quantity of the proposed surface and subsurface soil sample analyses for the site:

- Seven samples will be analyzed for VOCs, SVOCs, and metals, using Level 2 data quality.
- One sample will be analyzed for VOCs, SVOCs, and metals, using Level 3 data quality to confirm Level 2 data quality.
- One sample will be analyzed for TCL/TAL (location will be based on field monitoring equipment results). This sample also will be analyzed for thiodiglycol to confirm or deny the presence of chemical warfare breakdown products at this site.



SCALE: 1"=60'

123 64



- LEGEND**
- PROPOSED SURFACE AND 1-3 FOOT SUBSURFACE SAMPLE LOCATION
 - PROPOSED SOIL TEST BORING LOCATION
 - STB-99 ● SOIL TEST BORING LOCATIONS
 - MW-99 ⊕ MONITORING WELL LOCATIONS
 - PRESUMED SITE LOCATION
 - 99 REMEDIAL INVESTIGATION SITE
 - 99 CWMP SITE
 - 99 SCREENING SITE
 - 7 EARLY REMOVAL SITE
 - RAILROAD
 - FENCE
 - ROAD
 - ND NOT DETECTED

NOTE: METALS ARE LISTED WHERE THEY OCCUR ABOVE DETECTION UNITS.

FIGURE 4-1
PROPOSED SURFACE AND SUBSURFACE
SOIL SAMPLE LOCATION FOR SITE 6
Defense Depot Memphis, Tennessee



4.2 Site 10—Solid Waste Burial Site

Site 10 is located in Dunn Field approximately 30 ft south of the north fence and 35 ft east of the west fence (Drawing 1). This site was discovered during the installation of MW-10. Charred metal, cans, broken glass, and ashes were encountered at a depth of 3.5 ft. MW-2 and STB-6 did not reveal the presence of any buried debris during their installation (ref. 5).

4.2.1 Site History

It is uncertain whether disposal at Site 10 was a one-time event or if the site was used continually. Unlike other burial sites recorded by DDMT, there is no documented use of this site. The installation records do not indicate this burial activity. Aerial photographs taken during 1958 reveal a possible trench around the area of the proposed site location. The boundary of the site presented in Figures 4-2 and 4-3 is estimated using the historical aerial photography. The 1960 photo obtained indicates that the site was backfilled.

4.2.2 Existing Sampling Data

Monitoring wells MW-2, MW-3, and MW-10 and soil boring STB-6 are located within the proposed site location (Figure 4-2). MW-2 is screened at a depth of 29 ft and is believed to be in a perched aquifer. The data from MW-2 are useful in evaluating whether leaching is occurring from this or other sites. Previous sampling activities (refs. 2 and 5) indicated the presence VOCs and metals in MW-10 and MW-3, although only metals were detected in MW-2. STB-6 was sampled at depths of 71.5, 76.0, 86.0, and 181.0 ft. The presence of VOCs and metals was detected at all sample depths. However, mud rotary procedures were used, and it is possible that contaminants were carried to these depths through this procedure. Appendix B contains the sampling data.

4.2.3 Potential Contaminants of Concern

Previous groundwater and soil samples taken at the site indicate contaminant levels exceeding PRGs of VOCs and metals. Therefore, the PCOCs for this site are VOCs and metals.

4.2.4 Data Gaps and Site-Specific DQOs

The following summary chart identifies the major data gaps and DQOs for Site 10.

Site 10—Data Gaps and DQOs Defense Depot Memphis, Tennessee	
Data Gaps	DQOs
No data to assess what was buried at the site	Collect surface and subsurface soil samples to assess source of contamination.
No data to identify the source of potential contamination	Use Level 2 data to expedite the field investigation process.
No data to assess horizontal or vertical extent of soil contamination	Use Level 3 data to confirm Level 2 data.
No data to indicate whether contaminants are a result of disposal at Site 10 or other sites (surface/subsurface samples—upgradient well)	Collect a minimum of 1 TCL/TAL sample at a field-selected location.

4.2.5 Soil Sampling and Analysis

The sampling rationale at this site is based on both systematic and biased sample locations to meet the DQOs.

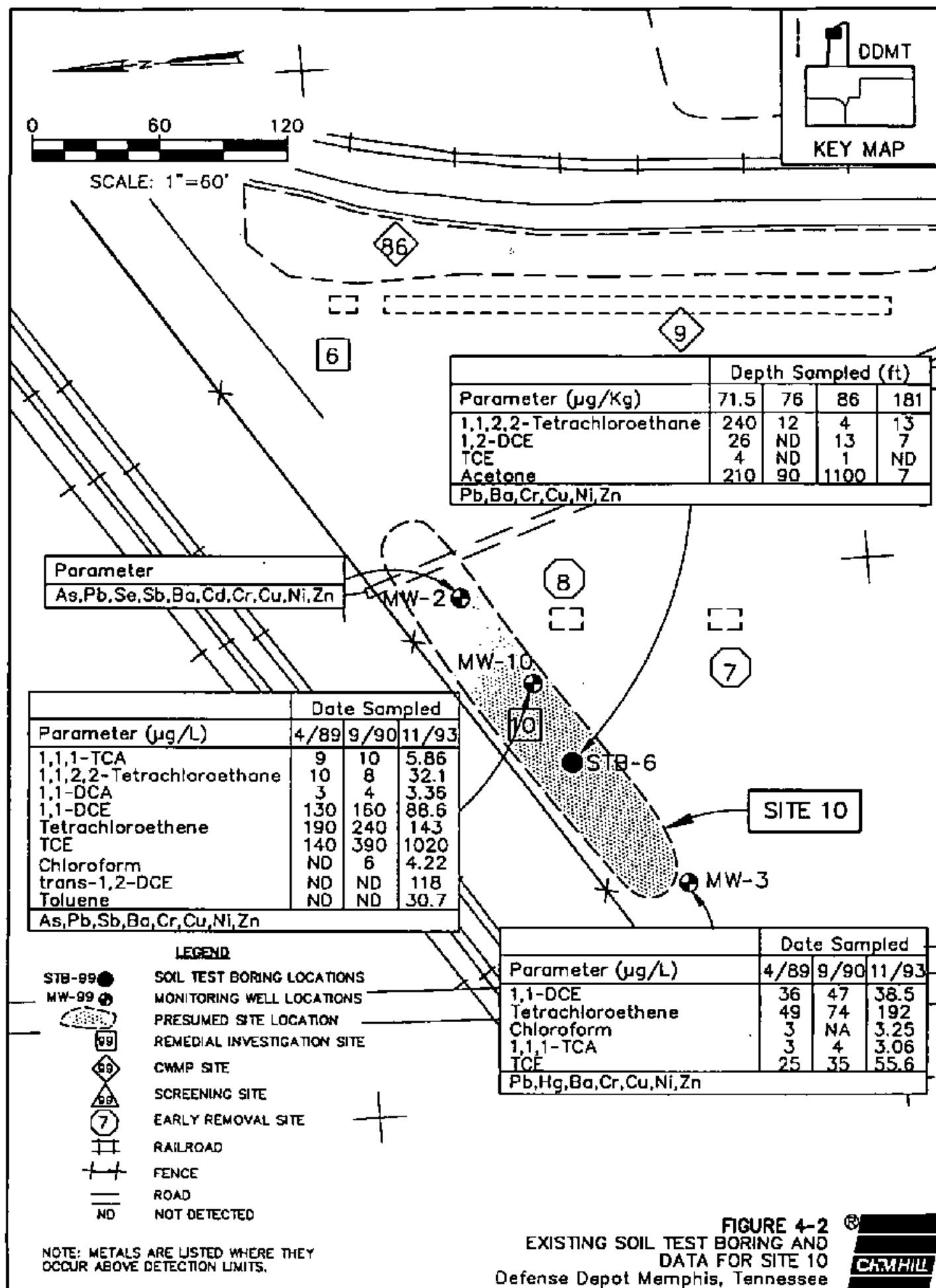
The objective of surface and subsurface soil analyses is to evaluate the origin and the vertical extent of contaminants at the site and to develop enough data to conduct a statistical comparison (see Section 3.5). Four soil borings will be installed at the site (Figure 4-3). Two of the borings will be on the perimeter of the proposed site location, and the remaining two borings will be installed within the boundary of the proposed site location. Samples will be collected at depths of zero to 12 inches, 5 ft, 10 ft, and 20 ft, and at 20-foot intervals to the top of the water table to assess the extent of contamination. Five surface soil samples will be taken at the site (Figure 4-3) to assess the presence and extent of surface soil contamination. The following list shows the quantity and quality of the proposed surface and subsurface soil sample analyses for the site based on the assumption that the water table is approximately 80 ft bgs:

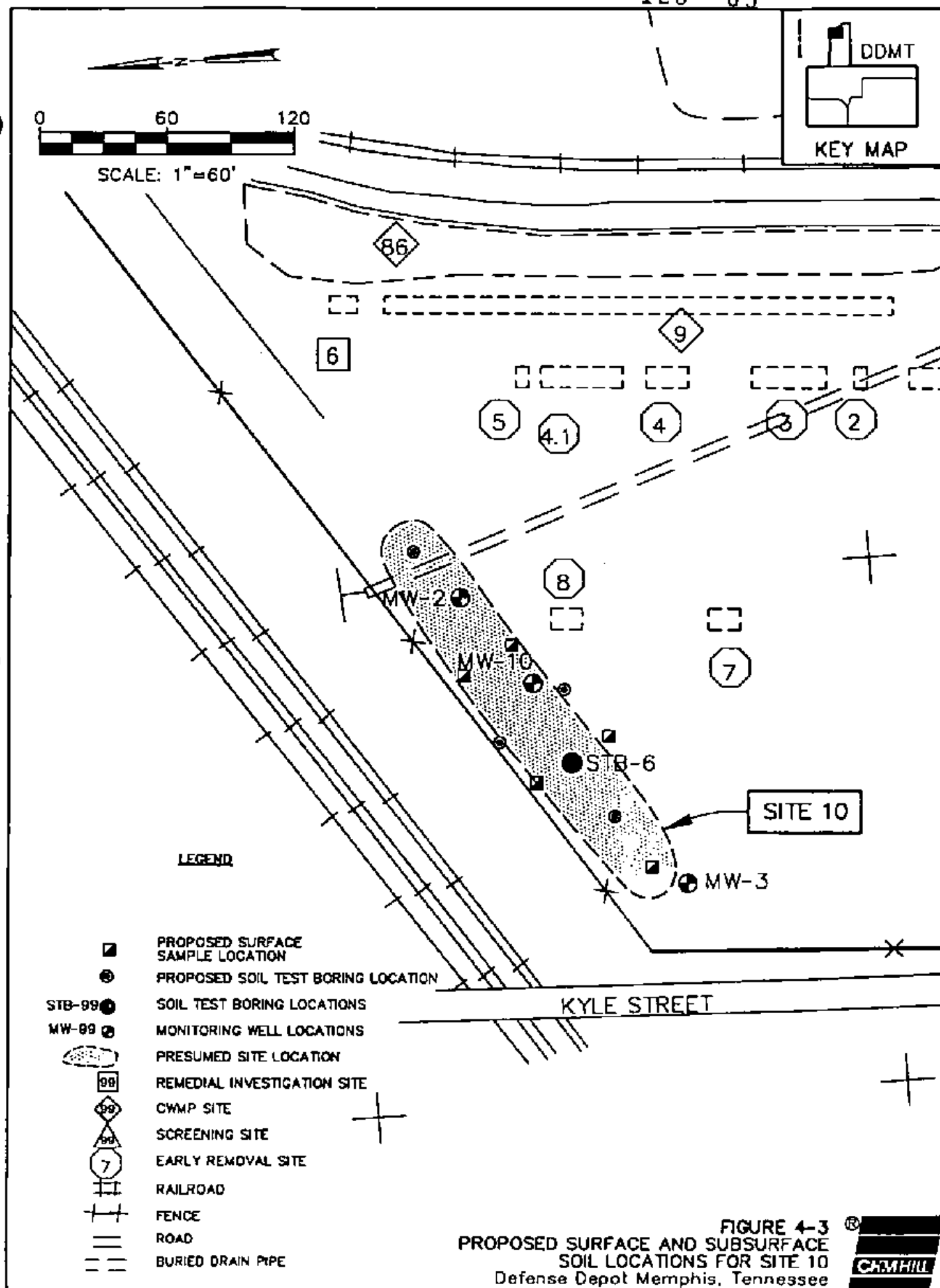
- Thirty-three samples will be analyzed for VOCs and metals using Level 2 data quality.
- Four samples will be analyzed for VOCs and metals using Level 3 data quality to confirm Level 2 data quality.
- One sample will be analyzed for TCL/TAL (based on field observations of monitoring equipment).

One sample will be collected from one of the borings (at the 10-foot depth) at Site 10 for geotechnical analyses. The purpose of the analyses is to obtain initial geotechnical and fate and transport data on subsurface soils for OU-1. The sample for analyses will be field selected by the hydrogeologist. The sample will be analyzed for grain size, Atterberg limits, and moisture content in accordance with Section 5.4.2.5 of the *QAPP* (ref. 15). Additional analyses to support fate and transport assessment include pH (SW-846 Method 9045), alkalinity (EPA 310.1M), cation exchange capacity (SW-846 Method 9080), and total organic carbon (EPA Method 415.1M).

4.2.6 Groundwater Sampling and Analysis

The facilitywide groundwater strategy is presented in Section 4.3 of the *OU-4 FSP*. Samples will be collected from wells MW-2, MW-3, and MW-10 adjacent to Site 10 for VOCs and metals, as explained in more detail in Section 4.3 of *OU-4 FSP*. Refer to the *OU-4 FSP* for additional details.





4.3 Site 14—Municipal Waste Burial Site

Site 14 is located approximately 75 ft from the western boundary and is adjacent to MW-12 and MW-35 (Drawing 1).

4.3.1 Site History

The date of burial at this site is unknown. However, an aerial photograph taken during September 1965 reveals a road leading to the proposed site location. This site was used for municipal solid waste burial.

4.3.2 Existing Sampling Data

MW-12 and MW-35 are at Site 14. Previous results of groundwater analysis from MW-12 and MW-35 (refs. 2 and 5) indicate the presence of VOCs, SVOCs, and metals (Figure 4-4). No surface or subsurface sampling data exist for this site. Appendix B contains the sampling data for MW-12 and MW-35.

4.3.3 Potential Contaminants of Concern

Previous groundwater samples taken at the site indicate contaminant levels exceeding PRGs of VOCs, SVOCs, and metals. Therefore, the PCOCs for this site are VOCs, SVOCs, and metals.

4.3.4 Data Gaps and Site-specific DQOs

The following summary chart identifies the major data gaps and DQOs for Site 14.

Site 14—Data Gaps and DQOs Defense Depot Memphis, Tennessee	
Data Gaps	DQOs
No data to assess if surface or subsurface soil contamination is present	Collect surface and subsurface soil samples to assess source of contamination.
No data to assess horizontal or vertical extent of soil contamination if it exists	Use Level 2 data to expedite the field investigation process.
No data to indicate whether contaminants are a result of disposal at Site 14 or other sites (surface/subsurface samples—upgradient well)	Use Level 3 data to confirm Level 2 data. Collect a minimum of 1 TCL/TAL sample at a field-selected location.

4.3.5 Soil Sampling and Analysis

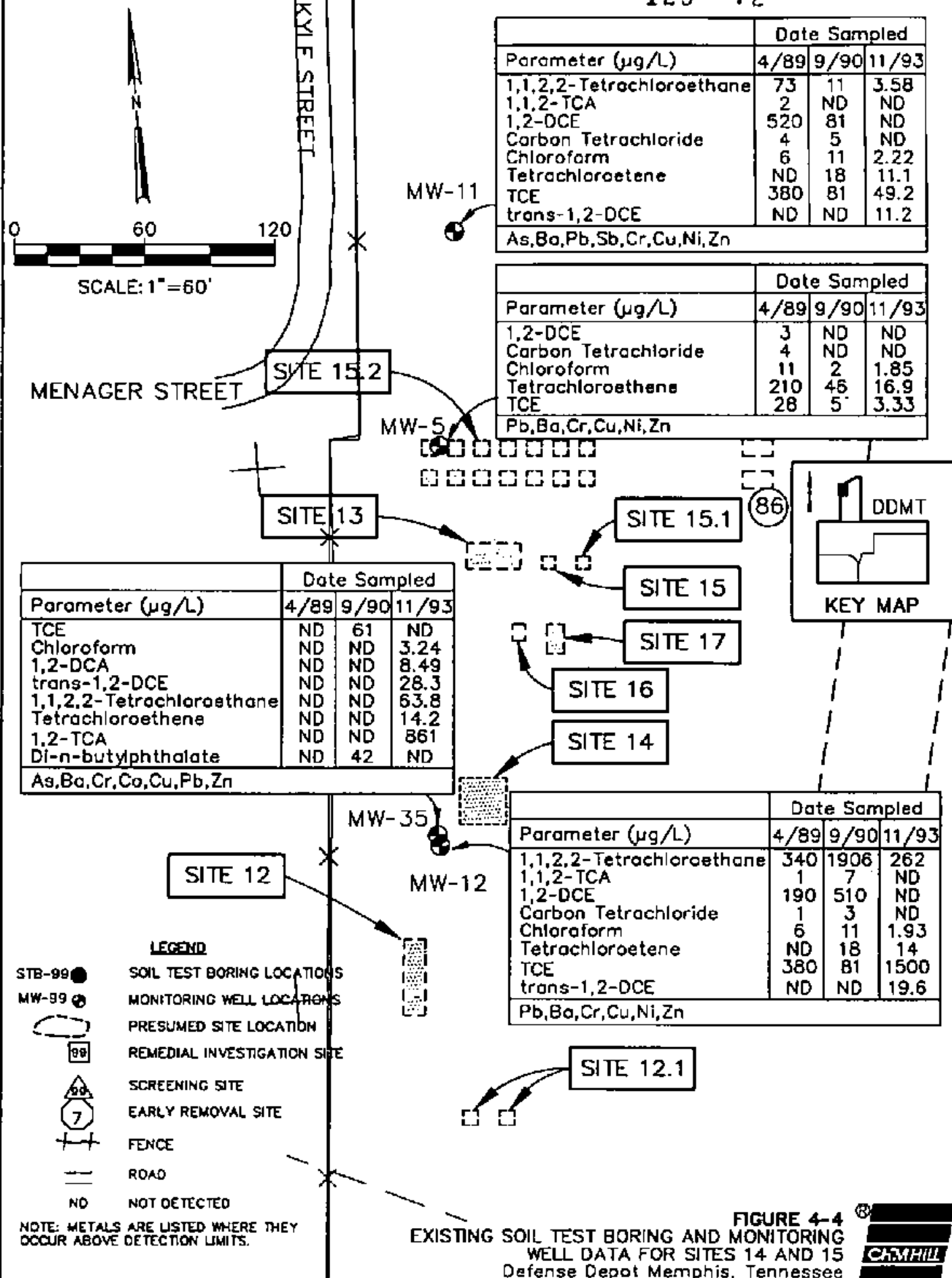
The sampling rationale at this site is based on both systematic and biased sample locations to meet the DQOs.

The objective of surface and subsurface soil analyses is to evaluate whether soil contamination exists and to evaluate the vertical extent of possible existing contaminants at the site (see Section 3.7). One soil boring will be installed at the proposed site location (Figure 4-5). Samples will be collected at depths of zero to 12 inches, 5 ft, 10 ft, and 20 ft. The 20-foot depth was selected because existing data indicate that a release has occurred. Three surface soil samples will be taken at the site (Figure 4-5) to assess the presence and extent of surface soil contamination. The following list shows the quantity and quality of the proposed surface and subsurface soil sample analyses for the site:

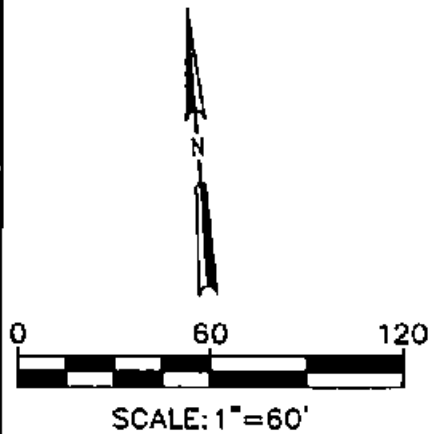
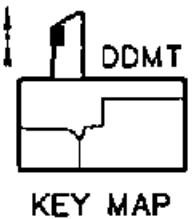
- Seven samples will be analyzed for VOCs, SVOCs, and metals using Level 2 data quality.
- One sample will be analyzed for TCL/TAL (based on the results of field monitoring equipment).

4.3.6 Groundwater Sampling and Analysis

Groundwater samples will be collected from existing monitoring wells at the site (MW-35 and MW-12) as part of the facilitywide groundwater approach. This approach is presented in Section 4.3 of the *OU-4 FSP*.



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MENAGER STREET

KYLE STREET

MW-11

MW-5

SITE 15.2

86

18

86

13

SITE 15.1

16

17

SITE 15

LEGEND

- PROPOSED SURFACE AND 3 FOOT SUBSURFACE SAMPLE LOCATION
- ⊙ PROPOSED SOIL TEST BORING LOCATION
- STB-99 ● SOIL TEST BORING LOCATIONS
- MW-99 ● MONITORING WELL LOCATIONS
- ▨ PRESUMED SITE LOCATION
- 88 REMEDIAL INVESTIGATION SITE
- 99 CUMP SITE
- 90 SCREENING SITE
- 7 EARLY REMOVAL SITE
- RAILROAD
- FENCE
- ROAD
- ND NOT DETECTED

NOTE: METALS ARE LISTED WHERE THEY OCCUR ABOVE DETECTION LIMITS.

MW-35

MW-12

12

12

FIGURE 4-5
PROPOSED SURFACE AND SUBSURFACE SOIL
LOCATIONS FOR SITES 14 AND 15
Defense Depot Memphis, Tennessee



4.4 Site 15—Sodium Burial Sites

Site 15 (which includes sites 15, 15.1, and 15.2) is located approximately 90 ft from the western boundary and 450 ft from the northern boundary (Drawing 1). The site consists of two rows of seven pits (Site 15), and two other 6-foot by 6-foot sites (Sites 15.1 and 15.2). An aerial photograph taken during 1971 reveals no ground disturbances at the proposed site location.

4.4.1 Site History

DDMT disposal records indicate that one pallet of sodium was buried in 1968 (Site 15), along with the burial of one pallet of sodium phosphate in 1968 (Site 15.1), and the burial of an unknown quantity of sodium (suspected salt), sodium phosphate, undefined acid, chlorinated lime, and medical supplies in 1970 (Site 15.2). The *RFA Report* (ref. 12) suggests that the VOCs and metal contamination in MW-5 and MW-11 are attributable to this site. However, records indicate burial of sodium salts and do not indicate that VOC-containing materials were buried.

4.4.2 Existing Sampling Data

MW-5 is located at the site and MW-11 is located approximately 90 ft north of the site. Prior sampling data (refs. 2 and 5) indicate the presence of VOCs and metals in both wells (Figure 4-4). No surface or subsurface soil sample data exist for this site. Appendix B contains the sample data for MW-5 and MW-11.

4.4.3 Potential Contaminants of Concern

Previous groundwater samples taken near the site indicate contaminant levels exceeding PRGs of VOCs and metals. Also, medical supplies have historically been disposed at the site. Therefore, the PCOCs for this site are VOCs, SVOCs, sodium, iodide, metals, and pH.

4.4.4 Data Gaps and Site-Specific DQOs

The following summary chart identifies the major data gaps and DQOs for Site 15.

Site 15—Data Gaps and DQOs Defense Depot Memphis, Tennessee	
Data Gaps	DQOs
No data to assess if surface or subsurface soil contamination is present	Collect surface and subsurface soil samples to assess source of contamination.
No data to assess horizontal or vertical extent of soil contamination if it exists	Use Level 2 data to expedite the field investigation process.
No data to indicate whether contaminants are a result of disposal at Site 15 or other sites (surface/subsurface samples—upgradient well)	Use Level 3 data to confirm Level 2 data. Collect a minimum of 1 TCL/TAL sample at a field-selected location.

4.4.5 Soil Sampling and Analysis

The sampling rationale at this site is based on a systematic approach of sample locations to meet the DQOs.

The objective of surface and subsurface soil analyses is to evaluate whether soil contamination exists, to evaluate the vertical extent of possibly existing contaminants at the site, and to develop enough data to conduct a statistical comparison (see Section 3.7). Four soil borings will be installed around the site (Figure 4-5). Samples will be collected at depths of zero to 12 inches, 5 ft, 10 ft, and 20 ft. The 20-foot depth was selected to assess whether a release to subsurface soils beneath the burial has occurred. Additionally, five surface soil samples will be taken at the site (Figure 4-5) to assess the presence and extent of surface soil contamination. The following list shows the quantity and quality of the proposed surface and subsurface soil sample analyses for the site:

- Twenty-one samples will be analyzed for VOCs, sodium, SVOCs, iodide, pH, and metals using Level 2 data quality.
- Two samples will be analyzed for VOCs, sodium, SVOCs, iodide, pH, and metals using Level 3 data quality to confirm Level 2 data quality.
- One sample will be analyzed for TCL/TAL (based on the results of the field monitoring equipment).

4.4.6 Groundwater Sampling and Analysis

Groundwater samples will be collected from existing monitoring wells at the site (MW-5 and MW-11) as part of the facilitywide groundwater strategy. The groundwater strategy is presented in Section 4.3 of the *OU-4 FSP*.

Table 4-1
Proposed Number of Analyses for Level 2 Data Quality
Defense Depot Memphis, Tennessee

Site	Level 2 Analytical Soil Samples					pH
	VOCs	SVOCs	Metals PPM (1)	Na (2)	Iodide	
6	7	7	7	-	-	-
10	33	-	33	-	-	-
14	7	7	7	-	-	-
15	21	21	21	21	21	21
TOTAL	68	35	68	21	21	21
- Not Analyzed (1) PPM - Priority Pollutant Metals (Ag, As, Be, Cd, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn) (2) Na - Sodium Note: See Section 3.2.2 of <i>QAPP</i> for analytical methods to be used for each parameter.						

Table 4-2
Proposed Number of Analyses for Level 3 Data Quality
Defense Depot Memphis, Tennessee

Site	Level 3 Soils							Level 3 Water						
	VOCs	SVOCs	Metals PPM ¹	Na ²	Iodide	pH	Thio- dyglycol	TCL/ TAL	VOCs	SVOCs	Metals (total) PPM ¹	Metals (dissolved) PPM ¹	Na ²	TCL/ TAL
6	1	1	1	-	-	-	1	1	-	-	-	-	-	-
10	4	-	4	-	-	-	-	1	3	-	3	3	-	1
14	-	-	-	-	-	-	-	1	2	2	2	2	-	1
15	2	2	2	2	2	2	-	1	2	2	2	2	2	1
TOTAL	7	3	7	2	2	2	1	4	7	4	7	7	2	3

- Not Analyzed
1PPM - Priority Pollutant Metals (Ag, As, Be, Cd, Cr, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn)
2Na - Sodium
Note: See Section 3.2.2 of QAPP for analytical methods to be used for each parameter.

- Not Analyzed

¹PPM - Priority Pollutant Metals (Ag, As, Be, Cd, Cr, Cu, Hg, Ni, Pb, Sb, Se, Tl, Zn)

²Na - Sodium

Note: See Section 3.2.2 of QAPP for analytical methods to be used for each parameter.

TAB

Section 5 - Preliminary Data Needs
for Remedial Alternatives

5.0 Preliminary Data Needs for Remedial Alternatives

After the RI field work has been completed, the data can be assessed to evaluate the appropriate future disposition of a site (NFA, FS, or IRA). Sites that require an FS to meet the objectives of the program will require additional data collection. The additional collection may be used to support the alternatives evaluation, to refine select alternatives, or to collect data to support remedial design activities.

5.1 Initial Alternatives

A cursory review of the RI sites at OU-1 has been conducted to develop a list of initial preliminary alternatives. These initial alternatives have been identified from existing data, the PCOCs, and knowledge about treatment technologies available. The initial alternatives do not represent a complete, detailed evaluation of alternatives or represent the final remedy. They do represent an initial attempt at identifying alternatives that are likely to be on the final list of developed alternatives for evaluating a site for remedial activities. The alternatives listed are presented for soil media only. Groundwater at OU-1 is currently being addressed through an IRA because of the known contamination in the groundwater at Dunn Field. The list of initial alternatives for soil media at each site is presented in Table 5-1.

5.2 Data Collection

For each alternative listed in Table 5-1, a select group of parameters has been identified. These parameters must be considered when evaluating the identified alternative. The parameters for each identified alternative are presented in Table 5-1. A field decision for each site will be made to assess whether the identified data needs will be met during the RI field investigation. Factors affecting the decision to collect data include the following:

- Presence of contamination
- Spatial magnitude of contamination
- Concentrations of contaminants
- Character of contaminants (VOCs, SVOCs, metals, and so forth)

Future data collection should be identified using data collected in the RI field investigation and by completing a detailed identification of remedial alternatives for each site.

Data collected for groundwater are presented in the *OU-4 FSP* (ref. 17). The facilitywide groundwater approach is presented in Section 4.3 of the *OU-4 FSP* to achieve a concise presentation of strategy.

Table 5-1
Preliminary Screening of Remedial Alternatives for RI Sites - OU-1
Defense Depot Memphis, Tennessee

Site Numbers and Descriptions*	Media	Analytical Data Available	Possible Parameters to be Remediated*	Remedial Options That May Be Evaluated*	Data Need for Initial Evaluation of Alternatives
Site 6 - 40,007 units Ointment (eye) Burial Site	Soil/Waste	No Site-Specific	pH, specific conductance	Landfill Cover	TCLP ⁴ , hazardous waste characteristics Adequate blow count information on boring logs (to 15 ft or so)
Site 10 - Solid Waste Burial Site	Soil/Waste	Yes; VOC plumes	VOCs (based on contaminant plumes)	Landfill Cover Incineration SVE	TCLP, hazardous waste characteristics Adequate blow count information on boring logs (to 15 ft or so) Metals (TCLP and total), chlorine, BTU as higher heating value and ash content (can probably use reference values) Grain size (if clay, do Aterburg), moisture content, soil boring profiles to water table, pump test (slug test if pump test not possible)
Site 11 - Trichloroacetic Acid Burial Site	Soil	No Site-Specific	pH, metals may be mobilized	Neutralization	pH, alkalinity, moisture content
Site 15 - Sodium Burial Sites	Soil	No Site-Specific	pH, sodium, phosphates, metals may be mobilized	Neutralization	pH, alkalinity, moisture content

Note: *Screening sites and NEA sites are not included in this table. Status of sites was based on the December 9, 1995, listing for the Site Management Plan.

⁴Listed are general categories of potential categories of contaminants. The list is not all inclusive nor a limitation on the analytical data to be collected, because current analytical data are not available for many sites and the listed COCs are based on reported activities. The "contaminants of concern" are for potential collection of data to support an alternatives evaluation.

*This table is a general list of potential data needs for the RI to aid in the scoping of field activities. It is not intended for use as the preliminary remedial alternatives screening for the FS, nor is it intended to collect data for all potential remedial alternatives to be evaluated. Alternatives that will not require data collection during the RI field activities are not included. Similar technologies would be grouped under a specific name; for example, incineration would generally also represent thermal desorption, cement kilns, incinerators, pyrolysis, or wet air oxidation as similar technologies.

⁴TCLP = Toxicity characteristic leachate procedure.

TAB

Section 6 - Quality Assurance
for Field Sampling

6.0 Quality Assurance for Field Sampling

The goal of QA in the field is to provide data of known quality to the project team to support the project decision-making process. The implementation of QA goals is the responsibility of the FTL. The FTL reports to the project manager (PM) and is responsible for the coordination of field efforts, provides for the availability and maintenance of sampling equipment and materials, and provides shipping and packing materials. The FTL supervises the completion of all chain-of-custody records, supervises the proper handling and shipping of samples, and is responsible for accurate completion of the field notebook. As the lead field representative, the FTL is responsible for consistently implementing program QA/QC measures at the site and for performing field activities in accordance with approved work plans, policies, and field procedures. The *QAPP* (ref. 15) provides details on meeting the goal of QA during the field investigation. This section summarizes some of the critical field QA procedures, as well as the QA/QC samples to be collected during the field investigation.

6.1 Field Documentation Summary

All field notes will be recorded in indelible ink on standard forms in bound notebooks. Section 4.3 of the *QAPP* (ref. 15) contains all information that will be recorded in the field book. A daily field log will be completed by the FTL. This log will be signed and dated daily. Significant events occurring during the day will be recorded and reported to the PM. Daily communication is essential to evaluate whether timely corrective measures are necessary. The field notebooks must provide a place for the field team members to sign and date the entries. The FTL or designated representative will conduct weekly informal audits for completeness. The following items must be entered:

- Sample labels
- Chain-of-custody records
- Field notebooks
- Sampling operations
- Document control

6.2 Field Monitoring Summary

All field monitoring equipment will be calibrated according to the procedures outlined in Section 6 of the *QAPP* (ref. 15); all field procedures concerning groundwater, soil, sediment, and surface water sampling are described in Section 5. Additionally, Section 5 contains soil boring and monitoring well drilling procedures, geophysical survey and logging procedures, and all equipment decontamination procedures.

6.3 QA/QC Sampling Summary

Different types of QA/QC samples will be collected and analyzed during the RI/FS at DDMT. These samples include the following:

- Trip blanks
- Equipment blanks
- Field blanks
- Field duplicates
- Matrix spike/matrix spike duplicate (MS/MSD) samples
- Split Samples

6.3.1 Trip Blanks

Trip blanks are to be analyzed for VOCs only. Three 40-milliliter (mL) VOC vials will accompany each ice chest that contains samples collected for VOC analyses. The trip blanks will be shipped to the site from the laboratory filled with American Society for Testing and Materials (ASTM) Type II water, along with sampling kits. One of the trip blanks will accompany split VOC samples to the COE QA laboratory.

6.3.2 Equipment Blanks

Equipment blanks are processed by rinsing decontaminated sampling equipment with ASTM Type II water obtained from the laboratory. The rinse water is collected in sample bottles, preserved, and handled in the same manner as the samples. Equipment blanks will be collected once a day for the equipment used during sampling procedures. Split equipment blank samples of the rinsate will be sent to the COE QA laboratory.

6.3.3 Field Blanks

Field blanks are samples of source water used for decontamination and are used to monitor the potential for contamination from the source water. One field blank will be collected from each source once a week.

6.3.4 Field Duplicates

The FTL will choose at least 10 percent of the Level 3 samples and 5 percent of the Level 2 samples from sample locations previously known to be contaminated, and will collect duplicate samples from those locations. The source information will be recorded in the field notes, but not on the chain-of-custody. The identity of the duplicates will not be given to the analyst. The source of information will be forwarded to the QA reviewer to aid in the review and validation of the data. The source of the field duplicate will be clearly identified in the chain-of-custody form sent to the QA laboratory.

6.3.5 Matrix Spike/Matrix Spike Duplicate

MS/MSD samples will be collected and shipped to the laboratory for spike sample analyses. Five percent of the samples collected at OU-1 will be accompanied by spike samples. However, if an MS/MSD sample has not been collected in a 14-day time period, a spike sample will be collected and sent for sample analyses.

6.3.6 Split Samples

Split samples will be collected for 1 percent of the samples at OU-1. Split samples will be handled as identified in Section 4.2.5 of the *QAPP* (ref. 15).

TAB

Appendix A - References

1. CH2M HILL, February 1995. *Generic Remedial Investigation/Feasibility Study Work Plan* (revised September 1995).
2. Environmental Science & Engineering, Inc. January 1994. *Groundwater Monitoring Results for Defense Depot Memphis, Tennessee*. Vol. 1 of 9.
3. Graham, D. D., and Parks, W. S., 1986. *Potential for Leakage Among Principal Aquifers in the Memphis Area, Tennessee*, U.S. Geol. Surv. Water-Res. Invest. Rep. 85-4295.
4. Harland Bartholomew & Associates, Inc., 1988. *Master Plan Report, Defense Depot Memphis, Tennessee*.
5. Law Environmental, August 1990. *Remedial Investigation at DDMT, Final Report*.
6. Moore, G. K. 1965. *Geology and Hydrology of the Claiborne Group in Western Tennessee*, Geol. Surv. Water-Supply Paper 1809-F.
7. National Oceanographic and Atmospheric Administration (NOAA), 1983. *Climatic Atlas of the United States*. Asheville, North Carolina.
8. Nyman, D. J., 1985. *Predicted Hydrologic Effects of Pumping from the Licherman Well Field in the Memphis Area, Tennessee*, Geol. Surv. Water-Supply Paper 1819-B.
9. U.S. Army Corps of Engineers, January 1995. *Archives Search Report*.
10. U.S. Army Environmental Hygiene Agency, 1982. *Geohydrologic Study No. 38-26-0195-83, Defense Depot Memphis, Tennessee*.
11. USEPA, 1988b. *Draft CERCLA Compliance with Other Laws Manual, Volumes I and II*. Office of Remedial Response, Washington, D.C., OSWER Dir. 9234.1-01.
12. USEPA, January 1990. *RCRA Facility Assessment, Defense Depot Memphis Tennessee*.
13. Wells, F. G., 1933. *Groundwater Resources of Western Tennessee, with a Discussion of the Chemical Character of the Water*, by F. G. Wells and M. D. Foster. U.S. Geol. Surv. Water-Supply Paper 656.

14. USEPA, 1989. *Methods for Evaluating the Attainment of Cleanup Standards, Volume 1: Soils and Solid Media*. EPA 230/02-89-042.
15. CH2M HILL, February 1995. *Generic Quality Assurance Project Plan* (revised September 1995).
16. CH2M HILL, February 1995. *Generic Health and Safety Plan* (revised August 1995).
17. CH2M HILL, March 1995. *Operable Unit 4 Field Sampling Plan* (revised September 1995).
18. Engineering-Science, Inc. November 1992. *Pumping Test Technical Memorandum for Defense Distribution Region Central, Memphis, Tennessee*. Prepared for U.S. Corps of Engineers—Huntsville Division.
19. *Archives Search Report Conclusions & Recommendations*. January 1995. Defense Distribution Depot Memphis, Tennessee. U.S. Army Corps of Engineers—Huntsville Division. Prepared by the U.S. Army Corps of Engineers—St. Louis District, under the Defense Environmental Restoration Program for Department of Defense Sites.
20. Simms, Janet E. *Electromagnetic and Magnetic Surveys at Dunn Field*. March 1994. Defense Distribution Depot Memphis, Tennessee. U.S. Army Corps of Engineers—Huntsville Division. Prepared by the U.S. Army Corps of Engineers, Waterways Experiment Station.
21. Freeze, R. Allan and John A. Cherry. 1979. *Groundwater*. Prentice-Hall, Inc.: Englewood Cliffs, New Jersey.

TAB

Appendix B - Existing Sampling Data

Appendix B-Table of Contents
Summary of Previous Investigations
Defense Depot Memphis, Tennessee

123 89

Study Title	Study Investigator	Date of Investigation	Purpose of Investigation	Appendix B Page Numbers
Remedial Investigation/ Feasibility Study	Law Environmental	August 1990	Groundwater, soil, surface water, and sediment sampling	B-2
Groundwater Monitoring Results for DDMT	Environmental Science & Engineering, Inc. (ESE)	September 1993	Groundwater sampling	B-10

**Remedial Investigation/Feasibility Study
Law Environmental
August 1990**

TABLE B-1

SAMPLE ID'S PARAMETERS	UNITS		H017		H018		H019		H020		H021		H022		H023		H024		H025		H026		H027		H028		H029		H030		H031		H032		H033		H034		H035		H036		H037		H038		H039		H040		H041		H042		H043		H044		H045		H046		H047		H048		H049		H050		H051		H052		H053		H054		H055		H056		H057		H058		H059		H060		H061		H062		H063		H064		H065		H066		H067		H068		H069		H070		H071		H072		H073		H074		H075		H076		H077		H078		H079		H080		H081		H082		H083		H084		H085		H086		H087		H088		H089		H090		H091		H092		H093		H094		H095		H096		H097		H098		H099		H100		H101		H102		H103		H104		H105		H106		H107		H108		H109		H110		H111		H112		H113		H114		H115		H116		H117		H118		H119		H120		H121		H122		H123		H124		H125		H126		H127		H128		H129		H130		H131		H132		H133		H134		H135		H136		H137		H138		H139		H140		H141		H142		H143		H144		H145		H146		H147		H148		H149		H150		H151		H152		H153		H154		H155		H156		H157		H158		H159		H160		H161		H162		H163		H164		H165		H166		H167		H168		H169		H170		H171		H172		H173		H174		H175		H176		H177		H178		H179		H180		H181		H182		H183		H184		H185		H186		H187		H188		H189		H190		H191		H192		H193		H194		H195		H196		H197		H198		H199		H200		H201		H202		H203		H204		H205		H206		H207		H208		H209		H210		H211		H212		H213		H214		H215		H216		H217		H218		H219		H220		H221		H222		H223		H224		H225		H226		H227		H228		H229		H230		H231		H232		H233		H234		H235		H236		H237		H238		H239		H240		H241		H242		H243		H244		H245		H246		H247		H248		H249		H250		H251		H252		H253		H254		H255		H256		H257		H258		H259		H260		H261		H262		H263		H264		H265		H266		H267		H268		H269		H270		H271		H272		H273		H274		H275		H276		H277		H278		H279		H280		H281		H282		H283		H284		H285		H286		H287		H288		H289		H290		H291		H292		H293		H294		H295		H296		H297		H298		H299		H300		H301		H302		H303		H304		H305		H306		H307		H308		H309		H310		H311		H312		H313		H314		H315		H316		H317		H318		H319		H320		H321		H322		H323		H324		H325		H326		H327		H328		H329		H330		H331		H332		H333		H334		H335		H336		H337		H338		H339		H340		H341		H342		H343		H344		H345		H346		H347		H348		H349		H350		H351		H352		H353		H354		H355		H356		H357		H358		H359		H360		H361		H362		H363		H364		H365		H366		H367		H368		H369		H370		H371		H372		H373		H374		H375		H376		H377		H378		H379		H380		H381		H382		H383		H384		H385		H386		H387		H388		H389		H390		H391		H392		H393		H394		H395		H396		H397		H398		H399		H400		H401		H402		H403		H404		H405		H406		H407		H408		H409		H410		H411		H412		H413		H414		H415		H416		H417		H418		H419		H420		H421		H422		H423		H424		H425		H426		H427		H428		H429		H430		H431		H432		H433		H434		H435		H436		H437		H438		H439		H440		H441		H442		H443		H444		H445		H446		H447		H448		H449		H450		H451		H452		H453		H454		H455		H456		H457		H458		H459		H460		H461		H462		H463		H464		H465		H466		H467		H468		H469		H470		H471		H472		H473		H474		H475		H476		H477		H478		H479		H480		H481		H482		H483		H484		H485		H486		H487		H488		H489		H490		H491		H492		H493		H494		H495		H496		H497		H498		H499		H500		H501		H502		H503		H504		H505		H506		H507		H508		H509		H510		H511		H512		H513		H514		H515		H516		H517		H518		H519		H520		H521		H522		H523		H524		H525		H526		H527		H528		H529		H530		H531		H532		H533		H534		H535		H536		H537		H538		H539		H540		H541		H542		H543		H544		H545		H546		H547		H548		H549		H550		H551		H552		H553		H554		H555		H556		H557		H558		H559		H560		H561		H562		H563		H564		H565		H566		H567		H568		H569		H570		H571		H572		H573		H574		H575		H576		H577		H578		H579		H580		H581		H582		H583		H584		H585		H586		H587		H588		H589		H590		H591		H592		H593		H594		H595		H596		H597		H598		H599		H600		H601		H602		H603		H604		H605		H606		H607		H608		H609		H610		H611		H612		H613		H614		H615		H616		H617		H618		H619		H620		H621		H622		H623		H624		H625		H626		H627		H628		H629		H630		H631		H632		H633		H634		H635		H636		H637		H638		H639		H640		H641		H642		H643		H644		H645		H646		H647		H648		H649		H650		H651		H652		H653		H654		H655		H656		H657		H658		H659		H660		H661		H662		H663		H664		H665		H666		H667		H668		H669		H670		H671		H672		H673		H674		H675		H676		H677		H678		H679		H680		H681		H682		H683		H684		H685		H686		H687		H688		H689		H690		H691		H692		H693		H694		H695		H696		H697		H698		H699		H700		H701		H702		H703		H704		H705		H706		H707		H708		H709		H710		H711		H712		H713		H714		H715		H716		H717		H718		H719		H720		H721		H722		H723		H724		H725		H726		H727		H728		H729		H730		H731		H732		H733		H734		H735		H736		H737		H738		H739		H740		H741		H742		H743		H744		H745		H746		H747		H748		H749		H750		H751		H752		H753		H754		H755		H756		H757		H758		H759		H760		H761		H762		H763		H764		H765		H766		H767		H768		H769		H770		H771		H772		H773		H774		H775		H776		H777		H778		H779		H780		H781		H782		H783		H784		H785		H786		H787		H788		H789		H790		H791		H792		H793		H794		H795		H796		H797		H798		H799		H800		H801		H802		H803		H804		H805		H806		H807		H808		H809		H810		H811		H812		H813		H814		H815		H816		H817		H818		H819		H820		H821		H822		H823		H824		H825		H826		H827		H828		H829		H830		H831		H832		H833		H834		H835		H836		H837		H838		H839		H840		H841		H842		H843		H844		H845		H846		H847		H848		H849		H850		H851		H852		H853		H854		H855		H856		H857		H858		H859		H860		H861		H862		H863		H864		H865		H866		H867		H868		H869		H870		H871		H872		H873		H874		H875		H876		H877		H878		H879		H880		H881		H882		H883		H884		H885		H886		H887		H888		H889		H890		H891		H892		H893		H894		H895		H896		H897		H898		H899		H900		H901		H902		H903		H904		H905		H906		H907		H908		H909		H910		H911		H912		H913		H914		H915		H916		H917		H918		H919		H920		H921		H922		H923		H924		H925		H926		H927		H928		H929		H930		H931		H932		H933		H934		H935		H936		H937		H938		H939		H940		H941		H942		H943		H944		H945		H946		H947		H948		H949		H950		H951		H952		H953		H954		H955		H956		H957		H958		H959		H960		H961		H962		H963		H964		H965		H966		H967		H968		H969		H970		H971		H972		H973		H974		H975		H976		H977		H978		H979		H980		H981		H982		H983		H984		H985		H986		H987		H988		H989		H990		H991		H992		H993		H994		H995		H996		H997		H998		H999		H1000		H1001		H1002		H1003		H1004		H1005		H1006		H1007		H1008		H1009		H1010		H1011		H1012		H1013		H1014		H1015		H1016		H1017		H1018		H1019		H1020		H1021		H1022		H1023		H1024		H1025		H1026		H1027		H1028		H1029		H1030		H1031		H1032		H1033		H1034		H1035		H1036		H1037		H1038		H1039		H1040		H1041		H1042	
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*A) units in micrograms per liter (ug/L).

**Groundwater Monitoring Results for DDMT
Environmental Science and Engineering, Inc.
September 1993**

TABLE B-2
POSITIVE RESULTS IN GROUND WATER
DUNN FIELD AREA
DEFENSE DEPOT MEMPHIS TENNESSEE

PARAMETER	Background Well	MW16	MCL	MW3	MW4	MW5	MW6	MW7	MW8	MW9	MW10	MW11	MW12	MW13	MW14	MW15	MW28	MW29	MW34	MW35	MW36	MW37
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HALOGENATED VOLATILES (ug/l)

1,1,1-Trichloroethane	PHASE I	200	3J	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
1,1,2,2-Tetrachloroethane	PHASE II	---	4J	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1,2-Trichloroethane	PHASE I	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1,2-Trichloroethane	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1-Dichloroethane	PHASE I	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1-Dichloroethane	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1-Dichloroethane	PHASE I	7	36	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,1-Dichloroethane	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,2-Dichloroethane	PHASE I	5	47	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,2-Dichloroethane	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,2-Dichloroethane	PHASE I	100.70(4)	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
1,2-Dichloroethane	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Carbon Tetrachloride	PHASE I	5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Carbon Tetrachloride	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Chloroform	PHASE I	100(4)	3J	2J	11	5	6	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Chloroform	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Methylene chloride	PHASE I	5	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Methylene chloride	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Tetrachloroethene	PHASE I	5	48	100	210	3	50	58	5	190	---	---	---	---	---	---	---	---	---	---	---	---
Tetrachloroethene	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Trichloroethene	PHASE I	5	25	4J	28	190D	19	21	7	140	380D	17000	---	---	---	---	---	---	---	---	---	---
Trichloroethene	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

NONHALOGENATED VOLATILES (ug/l)

Acetone	PHASE I	3J	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Acetone	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

NONHALOGENATED SEMIVOLATILES (ug/l)

Benzene	PHASE I	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Benzene	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Di-n-butyl phthalate	PHASE I	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
Di-n-butyl phthalate	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
N-Nitrosodiphenylamine	PHASE I	2J	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
N-Nitrosodiphenylamine	PHASE II	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
bis(2-Ethylhexyl) phthalate	PHASE I	5J	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---
bis(2-Ethylhexyl) phthalate	PHASE II	3J	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

TABLE B-3
POSITIVE RESULTS IN SUBSURFACE SOILS
DEFENSE DEPOT MEMPHIS, TENNESSEE

PHASE															
PARAMETER	STB-1-1	STB-1-2	STB-1-3	STB-2-1	STB-2-2	STB-2-3	STB-3-1	STB-3-2	STB-3-3	STB-4-1	STB-4-2	STB-4-3	STB-5-1	STB-5-2	STB-5-3
Depth of Sample	25.0	52.0	73.5	10.0	17.5	87.5	21.0	30.0	83.5	19.0	20.0	102.0	10.0	78.0	89.0
HALOGENATED VOLATILES ug/kg															
Chloroform	--	B	--	--	--	--	--	--	--	--	--	--	--	--	--
Methylene chloride	10B	10B	10B	7B	8B	12B	3J	3J	3J	2J	10B	10B	13B	21B	12B
NONHALOGENATED VOLATILES ug/kg															
2-Butanone	--	--	--	--	--	--	--	--	--	1B	--	--	--	--	--
Acetone	57	43	20	24B	12B	10B	--	--	30	31	8J	17	13	14B	14
Toluene	--	--	--	--	--	--	--	--	--	1J	--	--	--	--	--
NONHALOGENATED SEMIVOLATILES ug/kg															
Benzoic acid	--	--	--	--	--	50J	--	--	--	--	--	--	--	--	--
bis(2-Ethylhexyl) phthalate	1200	1200	760J	1100	1000	1000	2000B	6700	9100	9100	1500B	5600J	4500	4400	3200J
Di-n-butyl phthalate	--	--	--	--	2100J	1000J	1400J	1700J	1200J	--	--	--	--	--	--
N-Nitrosodiphenylamine	--	--	--	430B	--	--	--	--	--	--	44J	--	--	--	--
Polynuclear Aromatic Hydrocarbons (PAHs)	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Fluoranthene	--	--	--	--	51J	47J	--	--	--	--	--	--	--	--	--
Pyrene	--	--	--	--	40J	40J	--	--	--	--	--	--	--	--	--
TOTAL PAHs	--	--	--	--	91	87	--	--	--	--	--	--	--	--	--
NONVOLATILE METALS															
Barium (EPTOX in ug/g)	15	25	58	--	--	--	10	10	40	--	--	25	--	10	--
Cadmium (EPTOX in ug/g)	--	12	5	20	0	--	7	--	--	--	--	--	--	--	--

B (Organic) = Found in method blank.

J = Estimated value less than the sample quantization limit, but greater than zero.

-- = Not detected

TABLE B-3
POSITIVE RESULTS IN SUBSURFACE SOILS
DEFENSE DEPOT MEMPHIS TENNESSEE

Phase II													
PARAMETER	STB-6-1	STB-6-2	STB-6-3	STB-6-4	STB-7-1	STB-7-2	STB-7-3	STB-7-4	STB-8-1	STB-8-2	STB-8-3	STB-8-4	
Depth of Sample	71.5'	78.0'	85.0'	101.0'	71.0'	76.0'	91.0'	170.0'	62.0'	87.0'	127.0'	217.0'	
HALOGENATED VOLATILES ug/kg													
1,1,2,2-Tetrachloroethane	240E	12	4J	13	--	--	--	--	--	--	--	--	--
1,2-Dichloroethane	--	--	--	--	--	--	--	--	--	--	--	--	--
1,2-Dichloroethane	26	--	13	7	--	--	--	--	--	--	--	--	--
Methylene chloride	21B	10B	68J	54B	58J	11B	6B	6	10B	7B	58J	58J	58J
Trichloroethane	4J	--	1J	--	--	--	--	--	--	--	--	--	--
NONHALOGENATED VOLATILES ug/kg													
2-Butanone	--	--	15	--	--	--	--	--	30J	28J	2J	--	--
Acetone	21B	90	1100J	74	250	86	31	6J	60B	40B	45	26	26
Toluene	1J	1J	5J	--	--	5J	--	--	--	3J	--	2J	2J
NONHALOGENATED SEMIVOLATILES ug/kg													
bis(2-Ethylhexyl) phthalate	500B	200B	6400B	500B	1600B	160B	1000B	230B	520B	240B	350B	270B	270B
Di-n-butyl phthalate	--	--	--	--	--	--	76J	--	--	--	--	--	--
N-Nitrosodiphenylamine	--	--	--	--	--	--	--	--	850J	530J	30J	980J	980J
PESTICIDES ug/kg													
beta-BHC	--	--	14Z	--	--	--	--	--	--	--	--	10Z	10Z
VOLATILE METALS mg/kg													
Lead	8	7	5	0	11	9	7	--	--	8	--	7	7
NONVOLATILE METALS mg/kg													
Barium	20.7	39.1	42.5	72.7	39.1	51.6	60.6	10.6	3.6	26.1	2.0	14.2	14.2
Cadmium	--	--	--	--	--	--	--	0.6	--	--	--	--	--
Chromium **	9	11	4	5	12	11	6	4	1	5	2	6	6
Copper	3	3	4	5	2	6	6	2	3	5	0	6	6
Nickel	2	--	5	3	3	3	7	3	--	6	--	4	4
Zinc	15.7	11.4	31.2	47.2	12.1	41.3	31	11.9	14	20.5	3.0	11.6	11.6

B (Original) = Found in method blank.

D = Identified in an analysis at a secondary dilution factor.

J = Estimated value less than the sample quantitation limit, but greater than zero.

E = Concentration exceeds the calibration range of the GC/MS instrument for this specific analysis.

Z = Matrix interference; compound not positively identifiable

** = No distinction between Chromium (III) and Chromium (VI)

-- = Not detected.

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