

Operable Unit 4 Field Sampling Plan

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for

Defense Distribution Depot Memphis

September 1995

Prepared for

U.S. Army Corps of Engineers Huntsville Division

Prepared by



2567 Fairlane Drive Montgomery, Alabama 36116

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### **Executive Summary**

#### 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 Substances Pollution 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 4 as a supplement to the *Generic Remedial Investigation/Feasibility Study Work Plan*. The *Operable Unit 4 Field Sampling Plan* has two objectives. The first is to present a detailed description of the proposed sampling and analysis activities that will be performed for the characterization of Operable Unit 4 at Defense Depot Memphis, Tennessee. The second is to provide a detailed description of proposed sampling and analysis activities as a part of the facilitywide groundwater investigation.

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 areas. 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

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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 are a result of use of the area for landfill operations, mineral stockpiles, pistol range, 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 materials storage.

Operable Unit 4 contains the former wood treatment dip vat area, which is now used for pesticide storage and hazardous materials storage. Extensive remediation of soils was conducted at this site during 1985 and 1986. Samples taken in 1990 revealed pesticides at quantitation levels. Soil samples were also taken where past spills have occurred. These samples indicated the presence of solvents, petroleum products, pesticides, and metals. Groundwater samples in Operable Unit 4 indicated the presence of solvents and metals.

#### 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 4 data needs. Additionally, this Field Sampling Plan describes the sampling strategy and sampling plan at Operable Unit 4. A facilitywide investigation of the Fluvial Aquifer, including onsite and offsite wells, also is presented in this Field Sampling Plan. The final section of the plan evaluates the option of installing a monitoring well in the Memphis Sand Aquifer. The purpose of this Field Sampling Plan 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.

#### Sampling Strategy

A cost-effective sampling strategy has been developed to perform a 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 Operable Unit 4:

- Site upgrade (Feasibility Study activities, Remedial Designs, Remedial Actions)
- Site downgrade (support No Further Action)
- Interim Remedial Action or Early Removal

To support recommendations in a timely manner, soil and water samples will be collected at Operable Unit 4 and analyzed using a fixed-based laboratory. Data must be of sufficient quality to support the decision-making process. A tiered approach to sampling and analysis (including field screening) will be used so that the field team can adjust the sampling effort to accommodate site-specific conditions. Three categories of data will be collected as part of this field effort, with each category having a different level of supporting quality assurance/quality control documentation. The three categories, or levels, correspond to quality control levels 1, 2, and 3. Level 1 includes field monitoring activities such as pH, temperature, conductivity, and total organic vapor monitoring. Level 2 screening activities (such as using a field gas chromatograph for volatile organic compounds) are indicative of the nature of contamination, and Level 3 analysis provides confirmation by an analytical laboratory.

There is a potential for Level 4 data to be required in the future at this facility. Samples analyzed using Level 4 quality control are analyzed using the same analytical methods as Level 3 samples, but different data package deliverables are provided.

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**

Some surface and subsurface soil samples are planned for Operable Unit 4. Shallow soil borings will be installed surrounding and within Operable Unit 4. Soil samples will be collected at regular intervals from each boring to assess the vertical extent of contamination. Surface soil samples will be collected and analyzed to assess the horizontal extent of contamination.

The seven existing monitoring wells at Operable Unit 4 will be sampled according to procedures outlined in the *Generic Quality Assurance Project Plan*. Two additional monitoring wells will be installed to evaluate Fluvial Aquifer groundwater quality, to further characterize the configuration of the water table, and to assess the possibility of a contaminant release from Operable Unit 4. As a part of the overall groundwater quality assessment, 16 to 21 new Fluvial Aquifer wells will be installed to provide additional information concerning the estimation of the extent of the contaminant plume migrating to the west of Dunn Field, the extent of contaminants migrating under Defense Depot Memphis. Tennessee from offsite sources, the potentiometric surface of the Fluvial Aquifer, and the groundwater flow direction. Water level data from these wells and the other existing monitoring wells will be used to update the potentiometric surface map. Chemical analyses from these wells will be used to evaluate the nature and extent of contamination and to provide water quality data upgradient to the facility. The optional task of installing a well in the Memphis Sand Aquifer will be evaluated after discussion of groundwater sampling results from Fluvial Aquifer wells. The intent of this well will be to evaluate Memphis Sand Aquifer groundwater quality downgradient from the area of suspected hydraulic interconnection between the Fluvial Aquifer and the Memphis Sand Aquifer and further evaluate the nature of the potential hydraulic interconnection.

The ultimate goal of the Remedial Investigation/Feasibility Study is to select cost-effective cleanup actions that minimize threats and provide protection of public health and environment. To accomplish this, the nature and extent of the release of hazardous substances to the Fluvial Aquifer must be identified, the source of release must be determined, and proposed cleanup actions must be evaluated.

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1 Main Installation Investigation Site Location Map

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## Acronyms

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ARARs ASTM	Applicable or relevant and appropriate requirements American Society for Testing and Materials
beta-BHC	Beta-hexachiorocyclohexane
bls	Below land surface
BOD	Biochemical oxygen demand
BRA	Baseline risk assessment
CEHND	Corps of Engineers/Huntsville
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Contaminant of concern
COD	Chemical oxygen demand
COE	U.S. Army Corps of Engineers
DDE	1,1,1-dichloro-2,2-bis(4-chlorophenyl)ethylene
DDMT	Defense Depot Memphis, Tennessee
DDT	Dichlorodiphenyltrichloroethane
DLA	Defense Logistics Agency
DNAPL	Dense non-aqueous phase liquid
DOI	Department of Interior
DQOs	Data quality objectives
DRMO	Defense Reutilization 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	Federal Register
FRL	Final remediation level
FSP	Field Sampling Plan
FTL	Field Team Leader
HASP	Health and Safety Plan
HQ/HI	Hazard quotient/hazard index
HRS	Hazard Ranking System
D	Inside diameter .
IRA	Interim Remedial Action
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
NPL	National Priorities List
OU .	Operable unit

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# Acronyms (Continued)

РАН	Polynuclear aromatic hydrocarbon
PCOC	Potential contaminant of concern
PCP	Pentachlorophenol
PM	Project manager
POL	Petroleum, oil, and lubricants
PRG	Preliminary remediation goal
PVC	Polyvinyl chloride
QAPP	Quality Assurance Project Plan
QA .	Quality assurance
QC	Quality control
RAGS	Risk Assessment Guidance for Superfund
RALS	Removal action levels
RCRA	Resource Conservation and Recovery Act
RGO	Remedial goal option
RI/FS	Remedial Investigation/Feasibility Study
RI/FS WP	Generic RI/FS Work Plan
ROD	Record of Decision
SMP	Site Management Plan
STB	Stratigraphic test boring
SVOC	Semivolatile organic compound
TCE	Trichloroethene
TCLP	Toxicity Characteristic Leachate Procedure
TCL/TAL	Target Compound List/Target Analyte List
TDEC	Tennessee Department of Environment and Conservation
THI	Target hazard index
TOC	Total organic carbon
TRL	Target risk level
UCL	Upper confidence limit
USGS	U.S. Geological Survey
VOC	Volatile organic compound
WWII	World War II

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### **1.0 Introduction**

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#### 1.1 Objectives

One objective of this Field Sampling Plan (FSP) for Operable Unit 4 (OU-4) is to present a detailed description of the proposed sampling and analysis activities that will be performed for characterization of the site (Site 57) in OU-4 at Defense Depot Memphis, Tennessee (DDMT). 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 distinguish among remedial actions considered feasible for this site. Once the site has been characterized, data will be evaluated and used to screen remedial alternatives in accordance with preliminary remediation goals (PRGs) and the baseline risk assessment (BRA).

Another objective of the OU-4 FSP is to present a detailed groundwater quality assessment strategy. The purpose of this effort is to evaluate the nature and extent of contamination beneath and to the west of Dunn Field, to further characterize the potentiometric surface of the Fluvial Aquifer, and to provide water quality data upgradient of the facility. The north-central section of the Main Installation has been designated by the U.S. Environmental Protection Agency (EPA) and DDMT as OU-4. A list of references is provided as Appendix A.

#### 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, 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 (FR), 57 FR 47180 No. 199, on October 14, 1992.

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. In response to the FFA, sites at DDMT have been grouped into four OUs and a number of screening sites that must be addressed under the CERCLA process.

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#### 1.3 Facility and Site Status

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, Proposed Plan, Record of Decision, Remedial Design, and Remedial Action). OU-specific FSPs are being prepared for OUs-1, 2, 3, and 4 and for the screening sites, and will provide guidelines for conducting the Remedial Investigation/Feasibility Study (RI/FS) for each of the OUs. 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-4 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 of. This FSP concurrently addresses the site within OU-4 that has been previously identified as requiring an RI. The remainder of the OU-4 sites identified as requiring confirmatory sampling will be addressed in the *Screening Sites FSP* (ref. 16). Table 1-1 presents a summary of the sites at OU-4, along with the document that addresses future work planned for the site. Drawing 1 (located at the end of this document) illustrates the location and status of each site identified in OU-4.

#### 1.4 Elements of the Field Sampling Plan

This FSP is written as a supplement to the "generic" (facilitywide) RI/FS work plans for DDMT. Details 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)

The FSP defines in detail the sampling and data-gathering methods that will be used. The structure of the FSP includes known site conditions and history; proposed site-specific sampling, analysis, intended data use, and data quality level; and a discussion of non-site-specific field actions required.

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### 2.0 Site Description

#### 2.1 Location

DDMT covers 642 acres of land in Shelby County, Memphis, 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 southcentral 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 to the Main Installation, respectively. Person Avenue, Kyle Street, and Hays Street serve as the northern, western, and eastern boundaries to Dunn Field, respectively. Figure 2-1 shows the installation's location within the Memphis area.

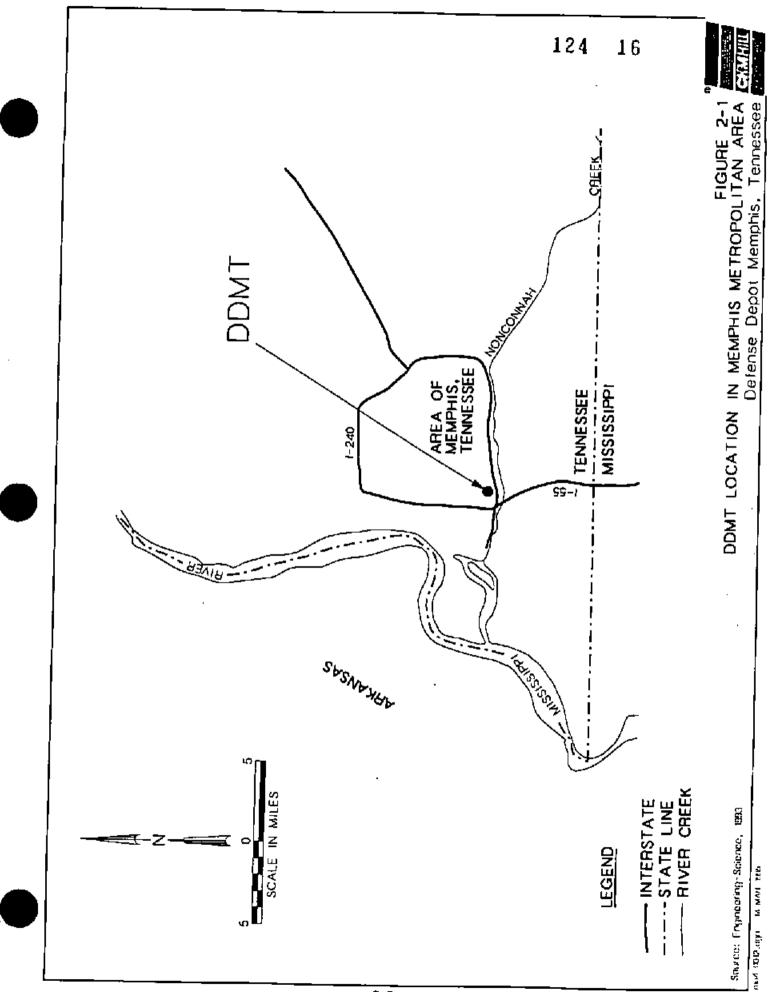
OU-4 consists of approximately 168 acres and is located in the north-central section of the Main Installation at DDMT. A site location map for DDMT is shown in Figure 2-1. The location of OU-4 in relation to the entire DDMT facility and other proposed OUs is shown in Figure 2-2.

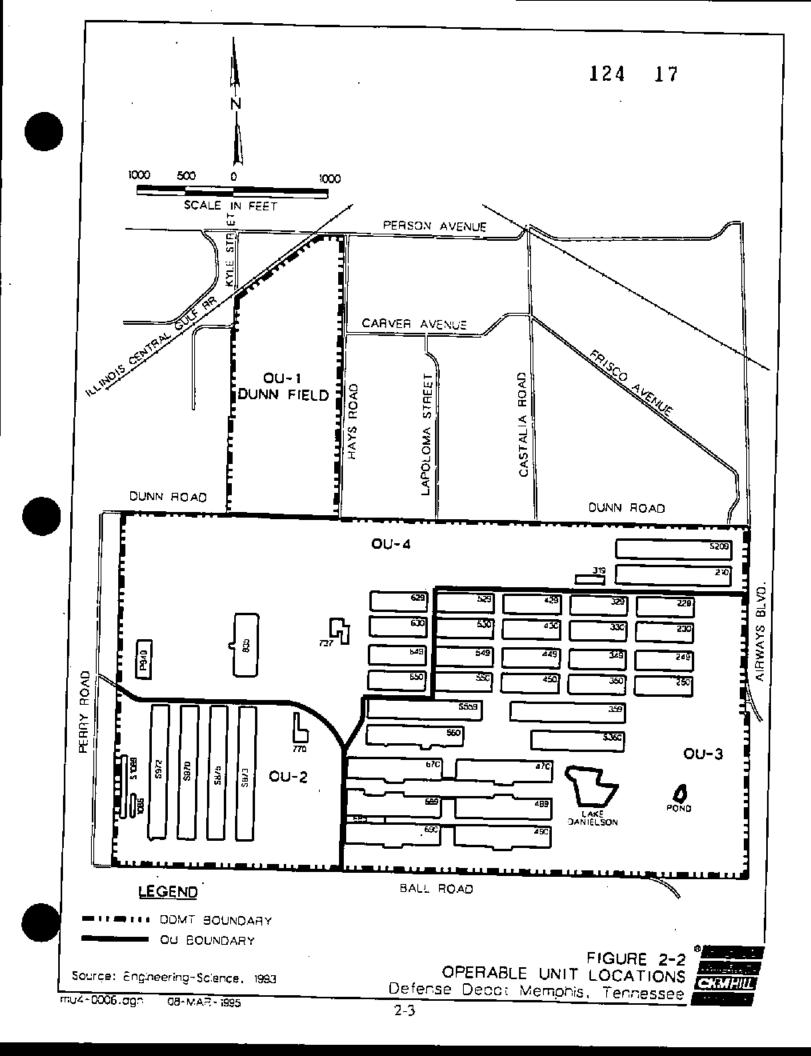
#### 2.2 Operable Unit Description

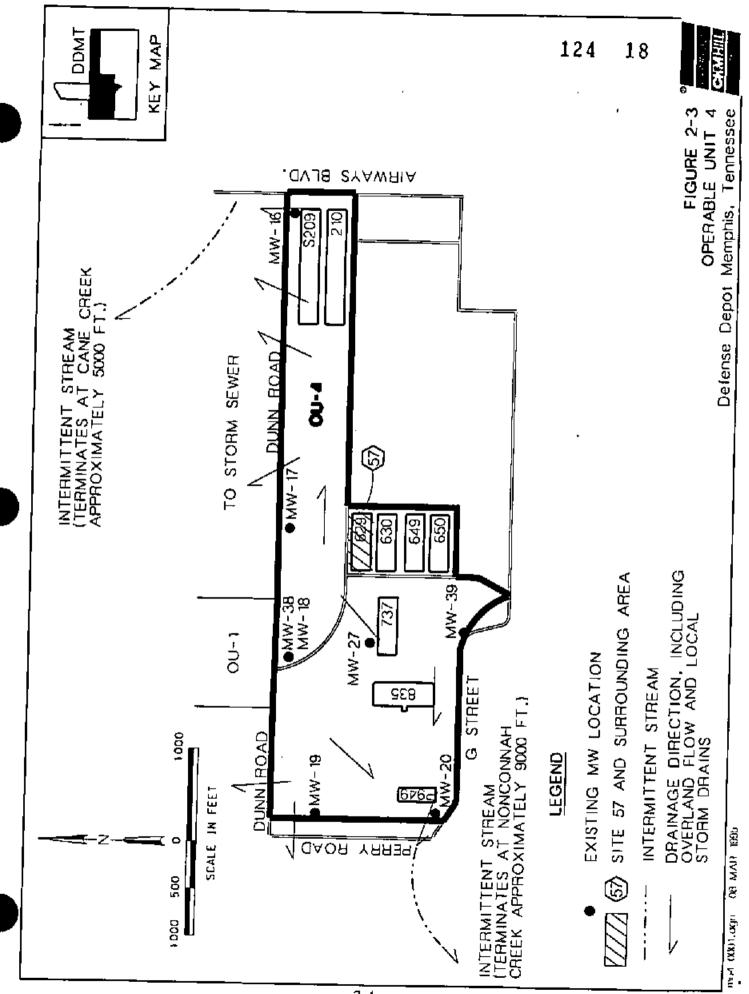
OU-4 includes former and current hazardous materials storage buildings-Buildings 319, 629, and 835-and the Defense Reutilization Marketing Office (DRMO) buildings and stock yards. The geographical area of OU-4 also contains the former Pentachlorophenol (PCP) Dip Vat area sites (all near Building 737), which will be addressed as part of the *Screening Sites FSP* (ref. 16). In addition, OU-4 is located in the general area of the installation where a data gap exists concerning the confining unit that separates the Fluvial Aquifer from the Memphis Sand Aquifer.

#### 2.3 Physiography

Figure 2-3 shows the location of Site 57 within the boundaries of OU-4, as well as the current land use. No perennial surface water bodies are located within the geographic boundaries of OU-4. All geological, climatological, physical, and surface drainage information for the Main Installation is discussed in detail in Section 2.4 of the Generic RI/FS WP (ref. 1).







2-4

#### 2.4 Hydrogeology

OU-4 is underlain by a layer of loess about 20- to 30-feet thick. Terrace deposits underlie the loess. The lower, saturated portion of the terrace deposits is referred to as the Fluvial Aquifer, which is the uppermost aquifer beneath DDMT. Perched groundwater also exists in the terrace deposits above small clay lenses at elevations above the Fluvial Aquifer. However, these perched water zones are temporal and are not considered part of the Fluvial Aquifer. The Fluvial Aquifer is not used as a drinking water source within the City of Memphis. The Memphis Sand Aquifer underlies the Fluvial Aquifer and is the primary source of drinking water for the City of Memphis.

The Fluvial and Memphis Sand Aquifers are separated by the Jackson Formation/Upper Claiborne Group, which generally consists of a high-plasticity clay of variable thickness. The depth to the top of the confining unit at OU-4 ranges from about 70 feet below land surface (bls) on the east and west sides of OU-4 to about 160 feet bls in the north-central portion of OU-4, where a depression in the top of the clay unit exists. The maximum thickness of this unit is estimated to be 85 feet at stratigraphic test boring (STB)-6, while the minimum thickness (at STB-8) is 5 feet of sandy, silty clay and 9 feet of interbedded silty clay and finegrained sand.

Figure 2-4 presents the November 1993 potentiometric surface map of the Fluvial Aquifer at DDMT. The map was compiled by contouring water levels recorded by Environmental Science & Engineering, Inc., (ESE) in November 1993 (ref. 2). The groundwater flow direction in the Fluvial Aquifer within OU-4 is toward the depression in the top of the clay unit on the northern portion of OU-4. This portion of DDMT is a suspected area of hydraulic interconnection between the Fluvial Aquifer and the underlying Memphis Sand Aquifer. The extent of the suspected area of hydraulic interconnection is currently unknown. Depths to Fluvial Aquifer groundwater generally range from about 60 feet on the east side of OU-4 to about 140 feet in the depression in the north-central portion of OU-4. The groundwater flow direction in the Memphis Sand Aquifer is westward toward the Allen Well Field.

A more complete discussion of the geologic and hydrogeologic conditions at OU-4 is presented in Section 2.4 of the *Generic RI/FS WP* (ref. 1).

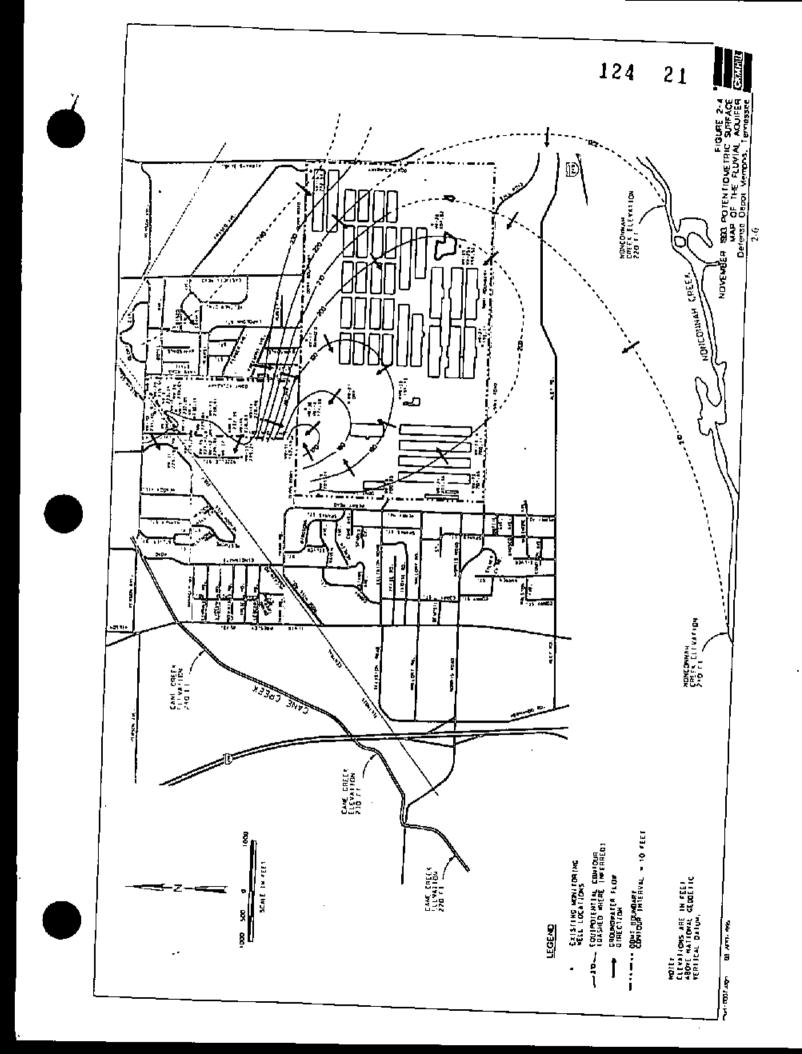
#### 2.5 Land Use

OU-4 is characterized by light industrial activities, primarily warehousing. The most prominent features of OU-4 include four World War II (WWII) vintage (typical) warehouses used for bulk storage; Buildings 319 and 835, which are used for warehousing hazardous materials; a hazardous recoup facility (where damaged hazardous materials are reclaimed); and the DRMO facilities used for waste handling. Building 737, also located in OU-4, was historically the PCP Dip Tank building. The following activities either now occur or are reported to have occurred at Building 737 in the past: pesticide/herbicide storage, mixing, and application; and treatment of wood products with PCP preservatives. Most of the land area within OU-4 has been graded, paved, and heavily built-up. The topography of this OU is primarily flat.

### 2.6 Operable Unit 4 Data Gaps

Using the existing data, knowledge of the site operations, and DDMT records, a review was conducted to assess where data were 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-4 sites are to evaluate the nature and extent of groundwater contamination in the Fluvial Aquifer with an emphasis on potential offsite receptors, to evaluate the potential interconnection between the Fluvial and Memphis Sand Aquifers, and to characterize soil contamination at Site 57. Table 2-1 provides a generalization of data needs, existing data, and future sampling requirements.

Table 2-1       Generalized OU-4 Data Gaps       Defense Depot Memphis, Tennessee		
Data Need/Use	Existing Data	Future Data Collection
Groundwater Flow-Fluvial Aquifer	Dunn Field monitoring wells Main Installation monitoring wells	Additional offsite groundwater monitoring wells. Groundwater level measurements.
Background water quality (metals)	Limited data for upgradient wells	Additional wells upgradient and offsite
Background soil chemistry	None available	Soil sample from offsite locations
Meet RCRA Permit Requirements for Confirmatory Sampling/RFI	Available for the site	Sampling at site
Evaluate offsite exposures for baseline risk assessment (BRA)	Limited offsite data records	Additional sampling offsite
Characterize site	Installation records; actual sampling	Install/analyze soil borings. surface soil and groundwater samples at site
Evaluate presence/thickness of confining unit: aquifer interconnection	Boring and well logs; regional reports; water level information; draft seismic reflection study	Additional wells and borings water level information (site and local/regional)



# 3.0 Sampling Strategy for Operable Unit 4

## 3.1 Structure of Operable Unit 4 Investigation

This section presents a detailed description of the overall strategy for the investigation of OU-4. The approach presented is intended to support a remedial decision to recommend one of the following options for OU-4:

- Site upgrade (FS activities, Remedial Designs, and Remedial Actions)
- Site downgrade (support no further action [NFA])
- Interim Remedial Action (IRA) or Early Removal (ER)

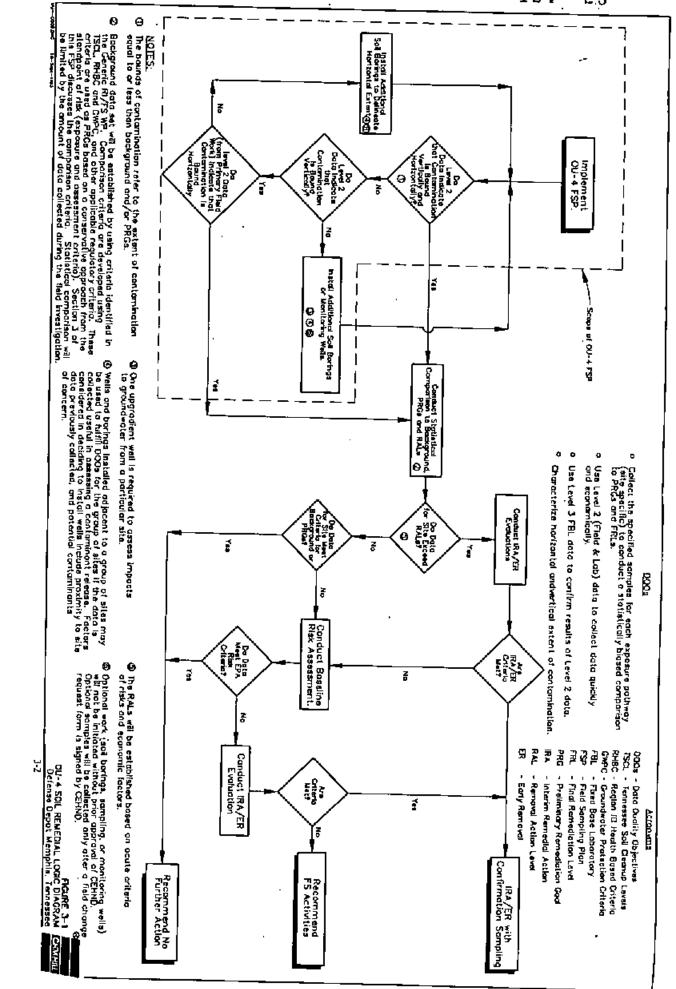
This work plan is intended to implement RI/FS activities on a cost- and time-effective basis. Field screening procedures and statistical evaluations will be used to facilitate decisionmaking, as defined by Figure 3-1.

### 3.1.1 Scope

In general, the soil investigation and groundwater investigation will be conducted in parallel. If soil contamination is present, the lateral and vertical extent will be delineated during the field effort.

Previous investigations at DDMT (ref. 2; ref. 5) have indicated the presence of organic and metal constituents in groundwater primarily in the vicinity of Site 57 and in the northwest portion of OU-1 (Dunn Field). To further evaluate the risk to potential offsite receptors and to develop the conceptual model of groundwater flow at the facility, the evaluation of groundwater contamination at OU-4 will be expanded to address groundwater flow and contaminant transport on a facilitywide basis, including the OU-1 groundwater plume. The initial groundwater investigation for OU-4 includes the installation of fluvial wells near Site 57 to further evaluate potential releases from past spills.

In addition, the investigation is designed to evaluate the suspected area of hydraulic interconnection between the Fluvial Aquifer and the Memphis Sand Aquifer. Upon completion of the evaluations, a determination will be made regarding the need for and feasibility of installing a deep well in the Memphis Sand Aquifer. This decision will require approval by state and federal agencies. If a decision is made to install the deep well, the procedures will follow the methods delineated in Section 4.6 of this document.



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### 3.2 Data Quality Objectives

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. The intended final use of the data determines DQOs. Specific objectives of this sampling effort are as follows:

- Evaluate the lateral and vertical extent of contamination in the soil and groundwater associated with releases from Site 57 and within Dunn Field, using Level 2 screening analytical methods, Level 3 analytical data, or both.
- Collect data to support a decision for remediation, including but not limited to, the following:
  - NFA
  - ER
  - Institutional controls
  - Excavation and onsite treatment/replacement
  - Excavation and offsite treatment/disposal
  - Excavation and offsite disposal
- Compare the levels of contamination at Site 57 and within groundwater against applicable regulatory levels or calculated risk-based levels, so that the appropriate recommendations can be developed.
- Collect soil and groundwater samples that are representative of actual site conditions.
- Conduct sufficient Level 3 fixed-based laboratory (FBL) analyses to support confirmation of Level 2 data and to support risk-based decisions, where appropriate.
- Provide reliable data results supported by quality control measures implemented during sampling and analysis.

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-4 RI Sites Defense Depot Memphis, Tennessee		
Primary Fieldwork DQOs <sup>4</sup>	Optional Fieldwork DQOs <sup>2</sup>	
Conduct proposed soil sampling at RI sites to evaluate the magnitude of a contaminant release as a result of historical site activities.	Collect groundwater data upgradient and downgradient of the site to assess whether a release to groundwater as a result of site activity has occurred.	
Collect sufficient data to support a statistical-based data comparison and to support a baseline risk assessment. A minimum of nine samples are necessary at each site for each exposure pathway to define the mean concentration at 95 percent confidence.		
Collect data to support the IRA evaluation.		
<sup>1</sup> DQOs that are achieved using the primary sampling activities <sup>2</sup> DQOs applicable if a potential contaminant release to groundw are not evaluated during the primary field activities. Notes: DQOs = data quality objectives	presented in Section 4 of this FSP, ater has been identified or if contaminants în soil media	
RI = Remedial Investigation		
IRA = Interim Remedial Action		

#### 3.3 Data Comparisons

The primary fieldwork of this investigation consists of monitoring well installation, groundwater sampling and analysis, measurement of aquifer characteristics, and surface and subsurface soil sampling and analysis. 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 under way, soil data will be collected through the use of the Level 2 data quality, which provides an expedited turnaround time. 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 with the PRGs (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 with the background data for each data point first, then with 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 with Level 3 data to assess the data usability. This comparison will be conducted after the Level 3 data have been analyzed by the laboratory and validated. The *Generic QAPP* (ref. 15), Section 3.2.2.2, discusses the approach to assessing data quality and usability. The goal is to collect Level 2 data of sufficient quality to be used for statistics and for BRA.
- Level 2 data will be compared with 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 with PRGs and RALs. This approach is presented in Section 3.7.

#### 3.4 Background Data

Background data for groundwater, surface water, soil (surface and subsurface), and sediment will be collected during the screening and RI fieldwork activities. The approach to collecting these 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 these background data numerical criteria also 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 with 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, surface soil samples, borings, wells, and ERs.

#### 3.5 Preliminary Identification of Applicable or Relevant and Appropriate Requirements and Screening 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 applicable or relevant and appropriate requirements (ARARs), including identification of PRGs. This information guides the development of appropriate sampling and analysis plans and removal 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.

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	Table 3-212427ARARs and PRGs Definitions12427Defense Depot Memphis, Tennessee
Term	Definition
Applicable or Rélevant 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 <sup>*</sup> 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.

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

- The National Oil and Hazardous Substances Pollution Contingency Plan (NCP), specifically 55 FR 8741-8766 for a description of ARARs, and 55 FR 8712-8715 for using ARARs as PRGs; also 53 FR 51394
- CERCLA Compliance Manuals (EPA, 1988 and 1989)
- Risk Assessment Guidance for Superfund: Volume 1— Human Health Evaluation Manual (Part B, Development of Risk-based Preliminary Remediation Goals) (RAGS Part B, EPA, 1991; ref. 9)

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 medium that would meet the NCP "threshold criteria" for 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 regard to hazardous waste

The detailed ARAR and PRG information, provided in the *Generic RI/FS WP* (ref. 1), Section 3.5, presents initial guidelines. This information does not establish that cleanup to meet these goals is warranted. As more information is obtained about all four 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 medium of potential concern, specifically groundwater, surface water, soil, and sediment. These criteria include ARARs-based PRGs, guidance values that are "to be considered," and screening risk-based PRGs.

The screening PRGs that were developed during this phase represent the most conservative approach to interpreting the site data. These data are intended for use in screening the sites to evaluate the appropriate disposition of the site.

The screening PRGs were developed from information provided in *RAGS Part B* (ref. 9) 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 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). A more detailed discussion of media-specific PRGs is 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 regard 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 during the 1990 RI activities (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 decisionmakers 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<sup>-6</sup>; 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 calculations 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 a potential "hot spot" or high-concentration location) shows concentrations exceeding the conservative screening PRGs (but below the RAL), it is possible that the average concentration over the designated exposure area may not represent a potential for adverse effects. Statistical sampling and comparison of estimates of the average concentration would meet 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. Provided that no hot spots (areas of high concentration relative to other areas of the site or elevated above an RAL) are identified, risk estimates are based on the average concentration (EPA *RAGS*, 1989; ref. 19). 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; therefore, these would also be compared with a statistical estimate of the average.

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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. 20). Several approaches are identified, including comparison of a calculated UCL95 of the mean with the target concentrations.

### 3.7.1 Statistically Based Samples

Surface soil samples will be collected at each site. A total of nine is the recommended minimum because it is the smallest number of samples that can be used in an estimate of the average concentration to be used in a UCL95 calculation without defaulting to the maximum detected concentration. Nine samples provide information on the chemical distribution of the contamination. The average is used to calculate a UCL95, which gives the upper confidence limit of a data set a 95 percent confidence.

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

## 4.0 Sampling Plan 12

#### 4.1 Objectives

Samples will be collected from surface soils and soil borings to characterize the horizontal and vertical extent of soil contamination that may have been caused by a release from Site 57. Soil samples will be collected and analyzed in accordance with the procedures outlined in the *Generic QAPP* (ref. 15). Upon completion, soil borings will be grouted in accordance with the procedures outlined in the *Generic QAPP*.

The objectives of the groundwater investigation are to achieve a better understanding of the Fluvial Aquifer characteristics including the direction and velocity of groundwater flow, the horizontal and vertical extent of groundwater contamination, the distribution of contaminant concentrations, and the degree of interconnection between the Fluvial and Memphis Sand aquifers. To achieve these objectives, groundwater samples will be collected from new and existing monitoring wells to assess groundwater quality that meets the following criteria:

- Flows onto DDMT from offsite
- Indicated the presence of contaminants in the past
- Is upgradient of known contamination
- Is associated with Site 57

Samples will be collected and analyzed in accordance with the procedures outlined in the *Generic QAPP* (ref. 15). Water level measurements will be performed on all wells and data obtained will be used to characterize the potentiometric surface of the Fluvial Aquifer.

#### 4.2 Site 57: Building 629

### 4.2.1 Site Description and History

Site 57 (Building 629 spill area) is the former hazardous materials storage building that has been used to store dichlorodiphenyltrichloroethane (DDT), herbicides, solvents, oxidizers, and other toxic and corrosive materials. Past spills may have occurred in this area, including a documented spill of an unknown amount of hydrofluoric acid. Site 57 contains a rail-loading dock approximately 125 feet long, located near the southwestern corner of Building 629, where pesticides, polynuclear aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs) were detected during the previous RI (ref. 5).

#### 4.2.2 Existing Data

Sampling data for OU-4 were collected during 1990 (ref. 5) and during ESE's groundwater monitoring field effort (ref. 2). Details of the chemical analyses are provided in Appendix B. Four surface soil samples (less than 0.5 foot bls) were taken around Site 57 (Building 629) in

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areas where past spills may have occurred (see Figure 4-1). PAH contamination and pesticides (including 1,1,1-dichloro-2,2-bis(4-chlorophenyl)ethylene [DDE], DDT, dieldrin, methoxychlor, gamma-chlordane, and beta-hexachlorocyclohexane [beta-BHC]) were detected in all four samples. Tolucne also was detected at low concentrations in all four samples, while 1,1,2-trichloroethane, tetrachloroethene, and trichloroethene (TCE) were detected in one of the samples. The metal contaminants—arsenic, lead, mercury, barium, cadmium, chromium, copper, and zinc—were present in at least three of the four surface soil samples. Soil sample results are summarized in Appendix B.

Groundwater samples were collected from monitoring wells MW-39, MW-38, MW-17, MW-19, and MW-20, which are screened in the Fluvial Aquifer (see Figure 2-3). Analytical results detected tetrachloroethene and TCE in MW-39. Acetone, a common laboratory contaminant and a degradation product of decontamination solvent, was detected in MW-17 and 20, as well as in the upgradient well (MW-16). Phthalates, which are common sampling contaminants, also were detected in all of the wells except MW-38. Groundwater sample results are summarized in Appendix B.

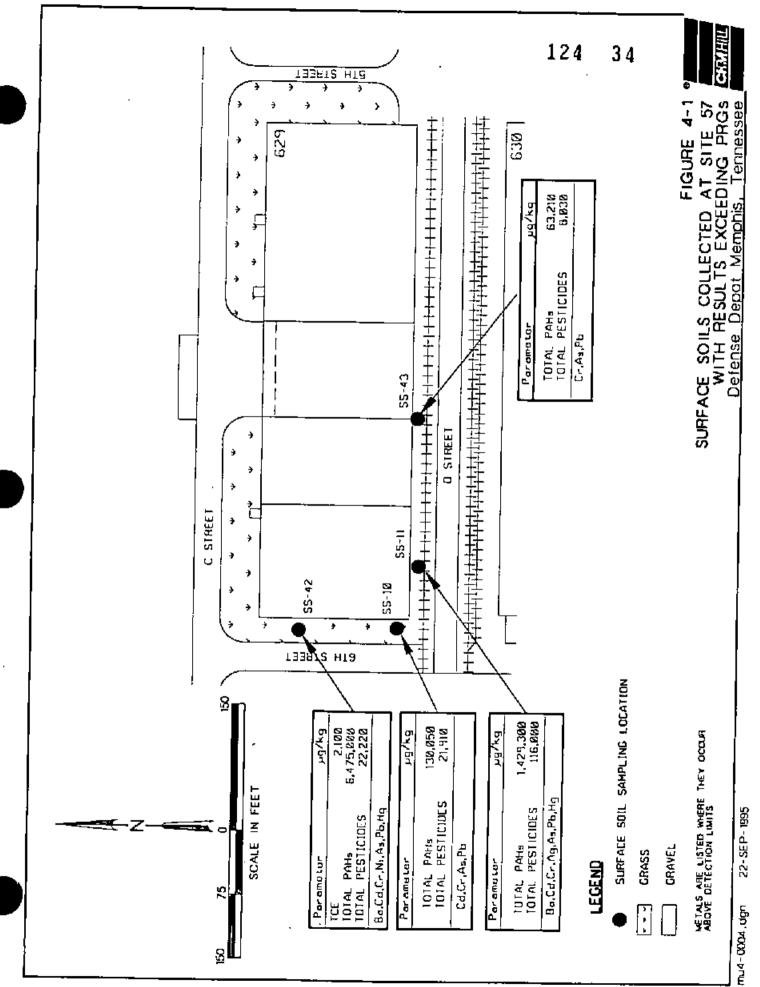
Subsequent sections of this FSP describe the sampling strategy and future sampling activities proposed for Site 57.

# 4.2.3 Soil Sample Location and Rationale

Sampling locations at Site 57 were evaluated and selected by the following methods:

- Loading and Unloading Area—The potential exists for releases as a result of spills at loading and unloading areas.
- Storage Locations—The potential exists for release from leaking and damaged containers at storage areas.
- Historical Information (e.g., recorded spills, results from previous investigations)—The potential exists for contamination at historical spill locations or is indicated using results from previous investigations.
- Site Topography and Drainage Pathways—Storm water contacting industrial activities can become contaminated. Also, contamination as a result of spills flows naturally through drainage pathways.

Sampling locations are subject to slight changes according to field screening results and field observations such as vegetative stress and noticeable staining. This approach is consistent with DDMT's overall approach to evaluating worst-case scenarios and to selecting "biased" sample locations at Site 57.



# 4.2.4 Potential Contaminants of Concern

Review of the site history and the previous sampling analytical results indicates that the potential contaminants of concern (PCOCs) for Site 57 are VOCs, semivolatile organic compounds (SVOCs), PAHs, metals, and pesticides.

## 4.2.5 Soil Sampling and Analysis

Nine shallow boreholes are initially proposed along the perimeter of Site 57 to determine contaminant concentrations in shallow soil in a manner that satisfies the DQO identified in Table 3.1. Shallow boreholes are positioned in areas identified by the criteria provided in Section 4.2.3 (see Figure 4-2) and sampled at 2, 5, and 10 feet (or as otherwise directed by the field engineer or hydrogeologist) for field screening of PAHs, VOCs, SVOCs, metals, and pesticides (Level 2 analyses). Shallow borings are appropriate at this site because releases from Building 57 were at the surface. Up to six additional borings may be installed based on the results of the initial nine borings. The location and depth of these borings will be based on the results of the field screening analyses. Ten percent of the surface soil samples will also be analyzed for Level 3 data quality to conduct the data comparisons defined in Section 3.3 of this work plan.

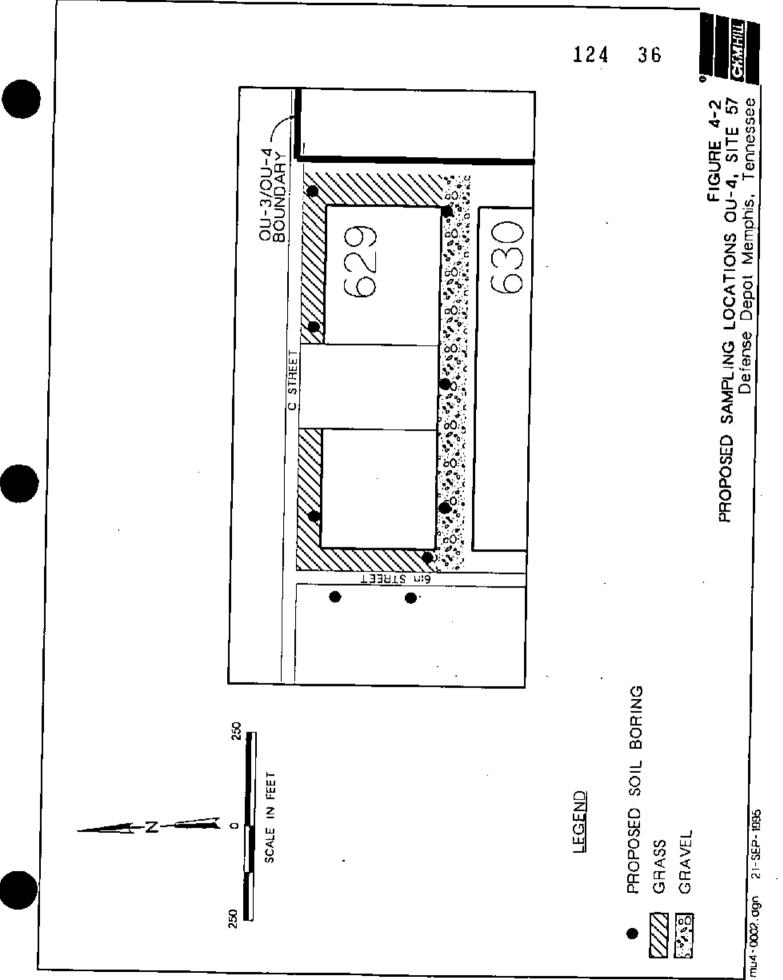
## 4.2.6 Groundwater Sampling and Analysis

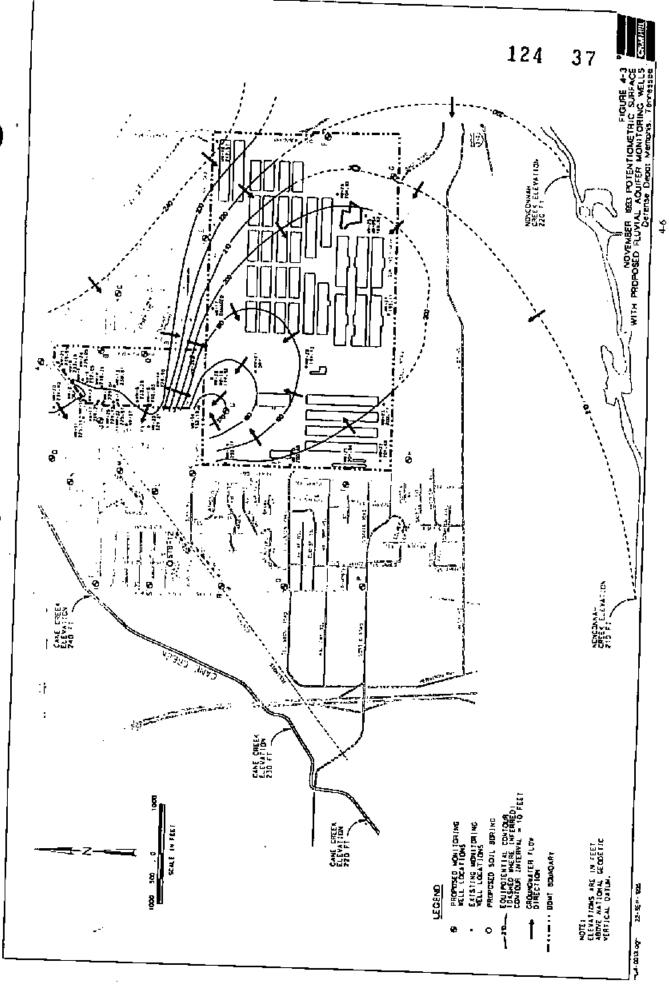
Two groundwater samples will be obtained from the Fluvial Aquifer to characterize groundwater contamination that may have been caused by a release from Site 57 and to further define the potentiometric surface. A monitoring well will be installed south of MW-34 to characterize Fluvial Aquifer groundwater quality from other potential sources in OU-4 (well U in Figure 4-4). From information collected to date, it appears that this well also will be used to evaluate groundwater downgradient of OUs-2 and 3. This monitoring well, along with other Fluvial Aquifer monitoring wells, will be used to characterize the extent of the suspected area of hydraulic interconnection between the two aquifers.

On the basis of the information obtained from the groundwater investigation, the feasibility of installing an additional deep well, screened in the Memphis Sand Aquifer, will be evaluated. This decision will take into account the following:

- Nature and extent of contamination at Site 57
- Nature and extent of contamination in the Fluvial Aquifer
- Potential hydraulic interconnection between the two aquifers
- Topography of the top of the confining clay bed
- Geotechnical properties of the confining clay bed

Existing monitoring wells MW-18, MW-19, MW-20, MW-27, MW-34, MW-38, and MW-39 will be sampled according to procedures outlined in the *Generic QAPP* (ref. 15), Section 5.4. Locations of the existing monitoring wells are shown in Figure 4-3. Groundwater samples will be screened for VOCs, SVOCs, unfiltered metals, and pesticides. The





groundwater samples collected will be analyzed and reported by the offsite laboratory using Level 3 QC requirements.

### 4.3 Facilitywide Groundwater Investigation

# 4.3.1 Strategy Summary

The goal of the groundwater investigation is to achieve a better understanding of the Fluvial Aquifer characteristics, the contamination within it, and the degree of interconnection between the Fluvial and Memphis Sand aquifers. The overall objectives to meet this goal include the following:

- Prepare a current potentiometric map for the Fluvial Aquifer, based on existing and additional monitoring well locations.
- Assess groundwater quality flowing onto the facility.
- Evaluate the nature and extent of the contamination plume beneath Dunn Field and offsite to the west.
- Assess the potential hydraulic interconnection between the Fluvial Aquifer and the deeper Memphis Sand Aquifer.

As part of the groundwater quality assessment at DDMT, this FSP includes the installation of as many as 21 new wells (A through U, see Figure 4-3) and the replacement of one existing well as described in Section 4.3.3. Nine of these wells will be placed around DDMT's perimeter, six will be placed outside of DDMT's property west of Dunn Field, five optional wells will be placed farther west (along Elvis Presley Boulevard or at other locations if appropriate), and a final well will be placed in the suspected area of hydraulic interconnection between the Fluvial Aquifer and the deeper Memphis Sand Aquifer.

Fluvial Aquifer wells will be screened just above the Jackson Formation/Upper Claiborne Group, which serves as the confining layer of the Memphis Sand Aquifer and the base of the Fluvial Aquifer. Groundwater near the base of the Fluvial Aquifer will be monitored because many of the detected organic compounds are characteristic of dissolved constituents of dense non-aqueous phase liquid (DNAPL), which are likely to accumulate at the top of the low permeability clay and present a source of dissolved organic compounds near the base of the Fluvial Aquifer. Drilling to the top of the Jackson Formation/Upper Claiborne Group also provides information on the elevation of the top of the confining layer as well as a lithologic description of the entire fluvial sequence.

For information about proposed monitoring wells associated with a specific site, refer to the OU-specific FSP for that site. Currently, known groundwater contamination at Dunn Field is being addressed through an IRA, which includes the proposed installation of a recovery well for testing purposes. A technical memorandum will be issued describing the drilling and

testing of the recovery well, with interpretation of results, and providing recommendations for location, construction, spacing, and pumping rates for additional recovery wells.

# 4.3.2 Existing Data

MWs-3 through 15, MW-28, MW-29, and MWs-30 through 35 are located in Dunn Field and screened within the Fluvial Aquifer. VOCs and metals have been detected in the groundwater in MWs-3 through 13, MW-29, MW-35, MW-31, and MW-32 during the previous RI (ref. 5) and during investigations conducted by ESE (ref. 2). Table 4-1 presents the maximum concentration of contaminants found in Dunn Field groundwater samples. Previous sampling activities also indicate the presence of VOCs and metals in Main Installation wells MW-21, MW-22, MW-25, and MW-26. Refer to Appendix B for complete sampling data. Tables 4-2 and 4-3 show comparisons of existing data with ARARs and PRGs.

# 4.3.3 Monitoring Well Location and Rationale

Figure 4-3 illustrates the locations of proposed monitoring wells addressed in this FSP, as well as the potentiometric contours of the Fluvial Aquifer in November 1993. Proposed locations are in the general area of placement; the exact placement of wells depends on a field check to ensure accessibility and absence of overhead or underground barriers such as power lines, underground cables, water lines, or other obstructions. Proposed monitoring wells have not yet been numbered to allow for greater flexibility in placement, addition, or deletion of any wells. Proposed wells are lettered in Figure 4-3 for convenience in discussion. The proposed wells will be numbered by the field team leader (FTL) in a manner consistent with standard well numbering practices at DDMT.

Wells A through E, when used with existing wells, have been placed to aid in the revision of the potentiometric surface map and to assess groundwater quality flowing onto the facility. Their positions were chosen to fill voids in water quality and water level data. Wells F, G, H, and I are upgradient from MW-26, MW-25, MW-22, and MW-21, respectively. As discussed in Section 4.3.2, these existing wells have indicated the presence of VOCs and metals in the past. Wells F, G, H, and I will therefore be useful in characterizing contamination associated with the existing monitoring wells, assessing groundwater quality flowing onto the facility, and providing the water level data necessary to update the potentiometric surface map.

Wells J through T have been placed to aid in delineation of the nature and extent of the contamination plume west of Dunn Field and to provide water level data necessary to update the potentiometric surface map. Wells K, L, and M will be installed first, with wells A through H installed next. Chemical analyses from Wells K, L, and M will be evaluated during the installation of Wells A through H, and a round of water level readings will be taken from new and existing wells. The chemical data will be used to evaluate whether the contamination is bound on the western side of the plume. The water level data will be used to revise the potentiometric surface map. A critical component of this investigation is that the need for the next proposed well is constantly reevaluated as new data are obtained from the last well that was drilled.

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Contaminants Fo	Table 4-1 num Concentration of ound in Dunn Field Ga epot Memphis, Tenne	roundwater
Constituent	MCL (µg/L)	Highest Level Detected During 1990 RI (µg/L)/(location)
Volatile Organic Compounds		
I,1-Dichloroethylene I,2-Dichloroethylene (total) tetrachloroethylene trichloroethylene carbon tetrachloride <u>Metals</u> arsenic barium chromium	7 70 5 5 5 5 2,000 100	160 (MW-10) 520 (MW-11) 240 (MW-10) 5.100 (MW-12) 77 (MW-6) 210 (MW-14) 3,740 (MW-14) 1,240 (MW-7)
lead nickel	15° 100	1,000 (MW-10) 602 (MW-7)
Action Level Notes: MCL = Maximum Contaminant Level tg/L = micrograms per liter MW = monitoring well Source: Engineering Science, 1994. F		

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	OU Defens	Table 4-2 ameters Detected with A I-4. Site 57, Groundwate e Depot Memphis, Tenn	۲.		
Parameter	Maximum Concentration Detected (mg/L)	MWs* w/Contaminants Detected	Risk based PRGs <sup>b,c</sup> (mg/L)		based PRGs
Pyrene  Pyrene  Tetrachloroethene  Frichloroethene  Aluminum  Arsenic  Barium  Soluble Barium  Cadmium  Chromium  Cobalt  Copper  Lead  Soluble Lead				MCLs <sup>d</sup> (mg/L)	TN Guidance Levels (mg/L)
	0.00184	39	1.095	N/A	N/A
	3.5E-05	39,38	1.17E-04	N/A	
	4.6E-05	39,38,20	1.17E-05	0.0002	N/A
·	6.3E-05	39.38,19,17	1.17E-04	N/A	N/A
	9.3E-05	39	N/A	N/A	N/A
	2.9E-05	39,38,19	0.001	N/A	N/A
	1.27E-04	39	0.012	N/A	
	5.0E-06	39	1.17E-05	N/A	N/A
	7.5E-05	39,38,20,19,16	1.25E-04	N/A	N/A
	2.0E-05	39,16	1.17E-04	N/A	N/A
	0.0012	17,19	0.146	N/A	0.025
	1.58E-04	39	N/A	N/A	N/A
Phenol	0.0059	38.39,20,16	2.19	N/A	3.50
Ругеле	1.66E-04	39	0.11	N/A	N/A
	0.00239	39	0.001	0.005	0.008
Trichloroethene	0.00353	39.38,16	0.004	0.005	0.005
Aluminum	120.0	20,39,38,19,16	N/A	N/A	N/A
Arsenic	0.0062	16,20,39	4.87E-05	0.050	0.05
Barium	0.567	39.20.38,39,16	0.256	2.0	1.0
Soluble Barium	0.112	19.20.39.16	0.256	2.0	1.0
Cadmium	0.008	17,19	0.002	0.005	0.01
Chromium <sup>d</sup>	0.191	20,38,39,19,16	0.018	0.1	0.05
Cobalt	0.0632	19.17	N/A	N/A	N/A
Copper	0.314	20,38,39,19,16	0.135	1.30	1.0
Lead	0.0852	20.38,39,19,16	N/A	0.015	0.050
Soluble Lead	0.0023	39	N/A	0.015	0.050
Мегситу	6.6E-04	19,17	0.001	0.002	0.002
Nickel	0.040	20,16	0.073	0.1	0.0134
Zinc	0.321	20,38,39,19,16	1.095	N/A	5.0

<sup>a</sup> For MW locations, refer to Figure 2-4. First MW location reported = MW location of maximum concentration.

<sup>b</sup> PRGs are based on standard exposure assumptions for ingestion, inhalation, and dermal contact.

following RAGS Supplemental Guidance, OSWER Directive 9285.6-03. Values developed by U.S.

EPA Region IX Technical Memorandum (August 6, 1993).

A risk assessment will be performed before finalizing these PRGs.

<sup>d</sup> State of TN Guidance levels and maximum concentration detected values are for total chromium.

Note: N/A = not available

	Tabl Comparison of Par OU-4. Sit Defense Depot Me	e 57, Soil	
Parameter	Maximum Concentration Detected (mg/L)	Surface Soil Samples <sup>a</sup> Detected	PRG <sup>4</sup> (mg/L)
Trichloroethene	2.1	42	2.77
Dibenzofuran	24	42.43.10,11	163
2-Methylnaphthalene	2	11.10	N/A
Acenapthene	64	42,43,10,11	2430
Anthracene	130	42.43,10,11	12200
Benzo(a)anthracene	970	42.43.10,11	0.13
Benzo(a)pyrene	450	42,43,10,11	0.013
Benzo(k)fluoranthene	450	42,43,10,11	5.55
Benzo(b)fluoranthene	540	42,43,10,11	0.13
Benzo(g.h.i)perylene	360	42,43,10,11	N/A
Chrysene	620	42.43.10.11	55.5
Dibenzo(a,h)anthracene	160	42,43,10,11	0.013
Fluoranthene	860	42.43.10,11	1630
Fluorene	47	42,43.10,11	1620
Indeno (1,2,3-cd) pyrene	310	42.43.10.11	0.555
Naphthalene	4.6	11,10,43	1610
Phenanthrene	620	42.43,10.11	N/A
Ругепе	870	42.43.10,11	1220
4.4'-DDD	3.6	11,10,42,43	0.395
4,4'-DDE	39	11,42,43,10	0.279
4.4'-DDT	5.9	11,42,43,10	0.279
Chlordane	4.4	10	0.0729
Methoxychlor	1.5	42	203
Heptachlor	0.12	10	0.0211
Heptachlor Epoxide	0.25	10	0.0104
Arsenic	26	43,42,11,10	0.231
Barium	343	11,42	12200
Cadmium	t1.8	42,11,10	174
Chromium <sup>e</sup>	135	11.42.43.10	868
Lead	1680	11,42,43,10	N/A
Mercury	1.3	42,11	52.1
Nickel	367	42	3470
Silver <u> </u>	9.0	11	868

\* For sample locations, refer to Figure 4-1.

 PRGs are based on standard exposure assumptions for ingestion, inhalation, and dermal contact following RAGS Supplemental Guidance, OSWER Directive 9285.6-03. Values developed by U.S. EPA Region IX Technical Memorandum (August 6, 1993).

<sup>e</sup> Maximum concentration detected values are for total chromium.

# Note: N(A + r)

N/A = not available

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A final well, Well U, will be placed in the area of suspected hydraulic interconnection (water table low) between the Fluvial Aquifer and the deeper Memphis Sand Aquifer. The purpose of Well U is to assess stratigraphy and groundwater quality in the immediate vicinity of the area of suspected hydraulic interconnection. The absence or presence and elevation of the Jackson Formation/Upper Claiborne Group at this location also will be evaluated. Evaluation of both water quality and stratigraphy at this location is intended to provide critical information concerning the probability of DDMT activities affecting the Memphis Sand Aquifer. Exact placement of this final well will depend on groundwater elevation data from the other wells. In general, the well is expected to be placed in OU-4 near the southwestern corner of OU-1.

The proposed deeper Memphis Sand Aquifer well, discussed in Section 4.6, may be installed if Well U does not encounter the Jackson Formation/Upper Claiborne Group or if the groundwater is found to be contaminated at Well U. Corps of Engineers/Huntsville (CEHND), DDMT, EPA, TDEC, and U.S. Geological Survey (USGS) are requested to be present when drilling Well U. Written permission must be provided by the Commander of DDMT prior to installation of this well.

### 4.3.4 Stratigraphic Test Borings

A stratigraphic test boring (STB-12, see Figure 4-3) will be completed through the Fluvial Aquifer to the top of the Jackson/Upper Claiborne confining unit prior to installation of the wells discussed in Section 4.3.3. The purpose of the boring is to assist in well installation by identifying stratigraphic features of the area and to characterize the offsite fluvial system for potential contamination and geotechnical parameters. Three samples will be taken and analyzed for screening Level 2 VOCs, SVOCs, TAL metals, and PCBs/pesticides: one from the surface, one within the saturated zone, and another based on the results of field screening and visual inspection of the core. A Shelby tube sample will also be taken from the Jackson/Upper Claiborne confining unit and analyzed for all geotechnical parameters identified in Section 5.4.2.5 of the *Generic QAPP* (Ref. 15), including triaxial permeability, as well as total organic carbon (TOC) (EPA Method 415.1), cation exchange capacity (SW-846 Method 9080), pH (SW-846 Method 9045), and alkalinity (EPA Method 310.1M).

### 4.3.5 Potential Contaminants of Concern

Previous investigations of the groundwater in the vicinity of or upgradient to the proposed wells indicate the presence of VOCs and metals. Therefore, the PCOCs for this portion of the investigation are VOCs, metals, and pesticides.

# 4.3.6 Groundwater Sampling and Analysis

The existing monitoring wells and analytical parameters selected for evaluation (see Figure 4-4) are presented in Table 4-4. Well-specific analytical parameters were based on a review of existing groundwater data (ref. 2; ref. 5). Additionally, eight of the wells (MW-3, MW-6, MW-8, MW-13, MW-14, MW-32, MW-34, and MW-36) will be analyzed to collect data for the evaluation of alternatives and to assess the risk of contamination associated with the facility. The additional analytical parameters include TOC, sulfate, nitrate/nitrite, chlorides, animonia, and iron. The eight wells were selected because of their location around OU-1, which will allow for a systematic sampling approach. Proposed monitoring wells A through J will be analyzed for TCL/TAL constituents to provide a comprehensive analysis of potential contaminants coming on to the facility (i.e., upgradient, background locations). Monitoring wells K through U will be analyzed for VOCs and metals to determine the western extent of groundwater contamination.

### 4.3.7 Geotechnical Sampling and Analysis

At each proposed fluvial well, a sample will be selected from the saturated portion of the Fluvial Aquifer and analyzed for grain-size distribution, Atterberg limits, and moisture content following sampling and geotechnical methods presented in Section 5.4.2.5 of the Generic QAPP (ref. 15). The sampling interval will be selected by the geologist in the field. Proposed fluvial wells O, K, I, D, and B (see Figure 4-3) will be sampled and analyzed for additional transport parameters from the fluvial aquifer and additional geotechnical parameters from the Jackson/Upper Claiborne confining unit. At each of these five wells, the Fluvial Aquifer geotechnical samples will also be characterized for TOC (EPA Method 415.1), cation exchange capacity (SW-846 Method 9081), pH (SW-846 Method 9045), and alkalinity (EPA Method 310.1M) to support qualitative and quantitative assessments of contaminant fate and transport. A Shelby tube sample will also be taken from the Jackson/Upper Claiborne confining unit at each of the same five wells and analyzed for all geotechnical parameters identified in Section 5.4.2.5 of the Generic QAPP (ref. 15), including triaxial permeability, as well as TOC (EPA Method 415.1), cation exchange capacity (SW-846 method 9081), pH (SW-846 Method 9045), and alkalinity (EPA Method 310.1M). Permeability data will be used to evaluate the potential for groundwater flow from the Alluvial Aquifer to the Memphis Sand Aquifer through the clay confining unit. The open wellbore within the Jackson/Upper Claiborne confining unit will be plugged with high solids bentonite grout to the base of the silt trap.

### 4.3.8 Hydraulic Conductivity

The hydraulic conductivity of the water-bearing zone in which each monitoring well is screened will be estimated using a rising-head pneumatic slug test method. This slug test method will allow testing to be performed quickly, and the nearly instantaneous removal of the pneumatic slug will eliminate much of the noise in the very-early-time data that is often present in manual slug test methods performed in transmissive aquifers. It is anticipated that

Table 4-4         Monitoring Wells and Analytical Parameters Selected for         Semi-Annual Assessment         Defense Depot Memphis, Tennessee										
Location	Location Monitoring VOCs SVOCs Total Met									
Dunn Field	2	-	-	x						
Dunn Field	3	x	•	х						
Dunn Field	4	x	-	х						
Dunn Field	5	x	-	x						
Dunn Field	6	x	x	x						
Dunn Field	7	x	x	x						
Dunn Field	8	x		x						
Dunn Field	9	x	-	X						
Dunn Field	10	x	-	x						
Dunn Field	11	х	-							
Dunn Field	12	x	.	x						
Dunn Field	13	x	x	x						
Dunn Field	14	-	x	x						
Dunn Field	15	x	-	x						
Dunn Field	28	-	-	x						
Dunn Field	29	x	x	x						
Dunn Field	30	-	x	x						
Dunn Field	31	x	x	x						
Dunn Field	32	x	- [	x						
Dunn Field	33	_	-	x						
Dunn Field	34		-	x						
Dunn Field	35	x	x	x						
Dunn Field	36	-		x						
Dunn Field	37	-	-	x						
Main Installation	17	x	-	x						
Main Installation	19	x	-	x						
Main Installation	20	х	-	x						
Main Installation	21	x		x						
Main Installation	22	x	-	x						

Def	Semi-Annua ense Depot Me	-		
Location	Monitoring Well	. VOCs	SVOC₅	Total Meta
Main Installation	23	x	-	x
Main Installation	24	x	x	x
Main Installation	25	x	-	x
Main Installation	26	х	-	x
Main Installation	38	x	х	x
Main Installation	39	х	-	x

the data will be analyzed using the method of Bouwer and Rice (ref. 18); however, other methods may be applicable depending on the nature of the hydrogeologic system.

### 4.3.9 Monitoring Well Abandonment

Based on information provided by DDMT and CEHND, MW-17, located in the north central portion of OU-4 (see Figure 4-3), has been damaged and may no longer be usable. As part of the OU-4 field activities, this well will be inspected and, if necessary, plugged and abandoned in accordance with American Society for Testing and Materials (ASTM) D 5299 and TDEC requirements. A new well will be drilled to replace it.

### 4.4 Fluvial Aquifer Monitoring Well Installation

### 4.4.1 Soil Sampling

As discussed in Section 4.3.1, each monitoring well boring will be drilled to the top of the Jackson Formation/Upper Claiborne Group. Soil samples will be collected at 5-foot intervals from each soil boring for visual classification. The samples will be collected on the basis of field screening and at the discretion of the field geologist. Selected soil samples also will be submitted for geotechnical analysis as discussed in Section 4.3.6. Refer to the *Generic QAPP* (ref. 15), Section 5.4, for soil sample analyses.

### 4.4.2 Well Design

Well and screen placement depths will be developed according to site-specific field conditions and will be determined by the onsite field geologist. Refer to the *Generic QAPP* (ref. 15), Section 5.4.1, for Fluvial Aquifer monitoring well design and construction details.

The depth of these wells is approximately 100 to 150 feet, based on data from previous studies. A 10-foot polyvinyl chloride (PVC) screen will be placed at or near the base of the Fluvial Aquifer. Risers used in the construction of the wells will be PVC. However, if DNAPL or elevated concentrations of VOCs are observed, stainless steel will be considered as the well construction material. Figure 4-3 shows the general locations proposed for the installation of these wells. Monitoring wells will be numbered by the FTL during field operations to allow greater flexibility in placing wells as more information is obtained.

### 4.4.3 Monitoring Well Development

The new monitoring wells will be developed in accordance with the procedures outlined in the *Generic QAPP* (ref. 15), Section 5.1.2. In addition to the new wells installed at OU-4, all existing monitoring wells at DDMT will be purged in accordance with the procedures outlined in the *Generic QAPP* (ref. 15), Section 5.4.2.7.

### 4.5 Quarterly Monitoring of Groundwater Levels

Groundwater levels will be measured in all DDMT wells both onsite and offsite for the first year. The purpose of this quarterly monitoring will be to evaluate levels of groundwater fluctuation in the wells and to further define the direction of groundwater flow. Water levels will be measured using standard measuring techniques described in the *Generic QAPP* (ref. 15), Section 5.1.2. If the fluctuation is not significant, measurements may be conducted semi-annually after the first year.

### 4.6 Memphis Sand Aquifer Monitoring Well Installation and Sampling

The following task is tentatively described, but installation will depend on the evaluation of offsite and OU-4 investigations. The confining unit clay will be drilled through only after provision of a written directive from the regulatory agencies to the Commander of DDMT.

#### 4.6.1 Purpose

The intent of a deep aquifer well will be to evaluate Memphis Sand Aquifer groundwater quality downgradient from the area of suspected hydraulic interconnection between the Fluvial Aquifer and the Memphis Sand Aquifer.

One of two criteria may be used to decide if the Memphis Sand Aquifer well is needed. It will be installed under the following conditions:

- If Well U is contaminated; or
- If no Jackson Formation/Upper Claiborne Group is encountered in drilling well U, it may be completed as a Memphis Sand Aquifer well.

The location of this monitoring well will be established after the extent of the suspected area of hydraulic interconnection between the Fluvial and Memphis Sand Aquifers has been evaluated by the installation of monitoring wells west of Dunn Field and at OU-4 (as outlined in this FSP). This well will be located next to a Fluvial Aquifer monitoring well, so that a nested well pair within the suspected area can be established between the two aquifers.

Two scenarios will develop when drilling begins, which are that the Jackson Formation/Upper Claiborne Group will be encountered or it will not. In the first instance, when the clay is encountered, the well will be completed as a Flovial Aquifer well seated at the top of the clay. This Flovial Aquifer well will be sampled. If the groundwater is contaminated in Well U, the Memphis Sand Aquifer well will be considered.

The second scenario occurs if the Jackson Formation/Upper Claiborne group is not encountered. Before drilling, a range of expected depths to the top and bottom of the Jackson Formation/Upper Claiborne Group will have been projected at the drilling site as based on existing data. As drilling progresses and no clay is encountered, and as long as the borehole is still within the expected range of the confining unit clay, drilling will continue. When the borehole is advanced to the bottom of the expected range, plus whatever contingency was previously agreed upon, the borehole will be in the Memphis Sand Aquifer, and therefore, it will be concluded that the clay bed is missing there. At this point, the most cost-effective solution would be to complete the well as a Memphis Sand Aquifer well. CH2M HILL recommends this approach, using a construction essentially as shown in Figure 5-3 of the *Generic QAPP* (ref. 15), only deeper. The second part of this scenario is that a Fluvial Aquifer well would be also necessary at this location, to provide the data to determine the potentiometric head differences between the aquifers at this potential point of interconnection.

### 4.6.2 Evaluation of Aquifer Interconnection

Nested pair monitoring wells MW-32/MW-37, located west of Dunn Field, and the new nested pair resulting from installation of the Memphis Sand Aquifer well will be sampled for water quality parameters to evaluate the degree of interconnection between the two aquifers.

Nested pair monitoring wells MW-32/MW-37 are installed outside of the suspected area of hydraulic interconnection between the two aquifers where the Jackson Formation/Upper Claiborne Group confining unit is 90-feet thick. The head difference between these two wells is about 70 feet. This head difference indicates minimal interconnection of the aquifers at this location. The new nested pair will be located inside the suspected area of hydraulic interconnection.

In addition to the PCOCs, the four monitoring wells and the deep well will be sampled for the following parameters:

	Aluminum		Bicarbonate
	Silica		Sulfate
•	Iron	4	Chloride
-	Calcium		Fluoride
-	Manganese	•	Nitrate
•	Sodium	-	Total dissolved solids
•	Potassium		Hardness, as CaCO,
•	Tritium		Ľ

The concentrations of these parameters will be compared between the deep well and shallow well in each nested pair. If minimal interconnection exists between the two aquifers, there should be a significant contrast between the water quality parameters in each aquifer. If mixing of groundwater is occurring, then the concentrations of the parameters in the Memphis Sand Aquifer and the Fluvial Aquifer should be similar. This comparison of water quality parameters between both pairs of nested wells will provide a qualitative indication of the degree of interconnection between the Fluvial Aquifer and the Memphis Sand Aquifer inside the area of suspected hydraulic interconnection at DDMT.

# 4.6.3 Monitoring Well Installation

The Memphis Sand Well will be a double-cased monitoring well. The initial (surface) casing will be installed into the Jackson Formation/Upper Claiborne Group, which separates the Fluvial Aquifer from the underlying Memphis Sand Aquifer. The purpose of the surface casing is to prevent mixing of Fluvial Aquifer groundwater with Memphis Sand Aquifer groundwater inside the monitoring well borehole. The monitoring well (which is the second casing) will be installed inside the surface casing.

The surface casing will be steel and will be of sufficient inside diameter (ID) to allow drilling and installation of a 4-inch-diameter monitoring well. The surface casing will be installed a minimum of 3 feet into the top of the Jackson Formation/Upper Claiborne Group. The borehole to be drilled for the surface casing will be of sufficient diameter to allow a 2-inch annular space between the wall of the borehole and the outside of the surface casing. A drillable plug will be installed in the bottom of the surface casing before installation, thus providing a clean environment down to the top of the confining bed before drilling into the Memphis Sand Aquifer.

After drilling and placement of the surface casing to the target depth, the annular space between the borehole and outside of the surface casing will be pressure-grouted using a cement/bentonite slurry that conforms to ASTM D 5092-90. The grout will be placed using tremie methods. The grout will be allowed to cure for a minimum of 24 hours before well installation proceeds.

After installation of the minimum 8-inch-ID surface casing, a borehole will be advanced through the confining unit, to a minimum of 15 feet into the Memphis Sand Aquifer. Relatively undisturbed samples of the confining unit will be collected for laboratory permeability testing as specified in the *Generic QAPP* (ref. 15), Section 5.4.2.5.

After reaching the target depth, a 4-inch ID, schedule 80, PVC monitoring well will be installed in the Memphis Sand Aquifer in accordance with the procedures outlined in the *Generic QAPP* (ref. 15), Section 5.4. Except for the ID of the monitoring well screen and casing (which will be 4 inches), the well materials and completion will be the same as the materials specified in the *Generic QAPP*.

# 4.6.4 Monitoring Well Development

After installation, the monitoring well will be developed using the procedures outlined in the *Generic QAPP* (ref. 15), Section 5.4.2.7.

# 4.6.5 Monitoring Well Sampling and Laboratory Analysis

After the well has been developed, a full-scale chemical analytical scan will be run on the groundwater sample. Sampling methods will be in accordance with the procedures outlined in the *Generic QAPP* (ref. 15), Section 5.1.2.

### 4.7 Geophysical Logging

Geophysical logging will be performed on two wells currently installed in the Memphis Sand Aquifer (MW-36 and MW-37, see Figure 4-3) and four wells installed in the Alluvial Aquifer (MW-19, MW-34, MW-38, and MW-39). Natural gamma, caliper, and either dual density or acoustic velocity logging will be performed to confirm the integrity of the grout seals, to provide data on the configuration of the Jackson Formation/Upper Claiborne group confining layer, and to evaluate the distribution of clays within the Fluvial Aquifer.

# 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 may require additional data collection. The additional collection may be used to support the alternatives evaluation, to refine selected alternatives, or to collect data to support remedial design activities.

### 5.1 Initial Alternatives

A cursory review of the RI sites at OU-4 has been conducted to develop a list of initial preliminary alternatives. These initial alternatives have been identified from existing data, from the PCOCs, and from 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. Groundwater at Dunn Field currently is 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. 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 during the RI field investigation and by completing a detailed identification of remedial alternatives for each site.

Existing data for groundwater in wells at Dunn Field indicate the presence of VOCs, SVOCs, and metals. The preliminary data needs for remediation of Dunn Field groundwater include potentiometric surface, concentration of contaminants, and geotechnical data such as grain size and vertical hydraulic conductivity.

	Prelimia	ry Screening of R Defense De	Table 5-1 Preliminary Screening of Remedial Alternatives for RI Site 57, OU-4 Defense Depot Memphis, Tennessee	lie 57, OU-4		<b></b>
Site Numbers and Descriptions	Media	Analyticat Data Available	Possible Parameters to be Remediated <sup>a</sup>	Kernedial Options That May Be Evaluated <sup>b</sup>	<ul> <li>Data Need for Infful Evaluation of Afternatives</li> </ul>	= <u></u>
No. 57 Building 629 Spill Area	Soil	Linuicd	VOCs, SVOCs, pesticades, metals	Land Disposal	TCLP, HW characteristics	<del>_</del>
				Incineration	Metals (TCLP and total). chlorine, Btu as higher heating value and ash content (can prohably just use reference values)	<b></b>
				Cover	Adequate blow count information on horing logs (() 15' or so)	
No 61 Base				Solidification/ Stabilization	pl1, maisture content, grain size, parasity	
in the building of a bill Area	Ground- water		VOCs. SVOCs	Containment	Slug and pump tests	
				Treatment	COD, BOD. TDS, TSS, pH, conductivity, cations/anions, ammonia, nitratc/nitrite, total phosphorus, alkitinity, hardness	<u> </u>
				In-Siu Biorectamation	Nutrients, electron acceptors, moisture content, dissolved oxygen, T, nH	•
<sup>a</sup> Listed are general 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 obtain stites and the listed COCs are based on reported activities. The "contaminants of concern" are for potential collection of data to support alternatives evaluation.	list is not all i Jactivities. T	nclusive nor a limi be "contarninants (	itation on the analytical data to of concern" are for potential co	aclusive nor a limitation on the analytical data to be collected, because current analytical data are n be "contaminants of concern" are for potential collection of data to support alternatives evaluation.	llytical data are not available for tilves evaluation.	12
the FS, not is it intended to collect data for all potential remedial alternatives of field activities. It is not intended for use as the preliminary remedial alternatives screening for included. Similar technologies would be grouped under a specific name; for example, incinentives that will not require data collection during the RI field activities are not pytolysis, or wet air oxidation as similar technologies.	is for the KJ is fal remedial al der a specific 5.	o und in scopiag of lternatives to be ev name; for example	field activities. It is not intend abuated. Alternatives that will a incineration would generally	) and in scoping of field activities. It is not intended for use as the preliminary remedial atternatives screening f Iternatives to be evaluated. Alternatives that will not require data collection during the RI field activities are ne name; for example, incinention would generally also represent thermal desorption, cement kiths, incinerators,	uid in scopiag of field activities. It is not intended for use as the preliminary remedial alternatives screening for tematives to be evaluated. Alternatives that will not require data collection during the RI field activities are not name; for example, incinention would generally also represent thermal desorption, cement kilns, incinerators,	4 5
Notes: TCLP = Toxicity Characteristic Leaching Procedure VOC = volatile arganic compound SVOC ≈ semi volatile arganic compound		TDS TSS	TDS = lotal dissolved solids TSS = lotal suspended solids	COD = chemical oxygen demand BOD = bischemical oxygen demand	tygen demand J oxygen demand	3

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Quarterly water level data and sampling data will be collected and analyzed for all monitoring wells in the Dunn Field area following procedures identified in Section 5.1.2 of the Generic QAPP (ref. 15). The data will allow the groundwater flow direction and contaminant levels to be evaluated for possible recovery well locations and proper design parameters for treatment systems. Pump and treat systems include but are not limited to the following:

- . Airstripping
- Metals removal (ion exchange, flocculation, or sedimentation) •
- **Biological** treatment
- Filtration (multimedia) •

# 6.0 Quality Assurance for Field Sampling

The goal of quality assurance (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/quality control (QC) measures at the site and for performing field activities in accordance with approved work plans, policies, and field procedures. The *Generic QAPP* (ref. 15), Section 3, provides details on meeting the goal of QA 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 *Generic 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 6.1 of the *Generic QAPP* (ref. 15); all field procedures concerning groundwater and soil 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.

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# 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 filled with ASTM Type II water when they are shipped to the site from the laboratory; the trip blanks will be shipped with sampling kits. One of the trip blanks will accompany split VOC samples to the U.S. Army Corps of Engineers (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 form. 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-4 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-4. Tables 6-1 and 6-2 present the number of QA/QC samples to be collected at OU-4 as based on the assumption that the duration of the field effort will be 20 days.

Split samples will be submitted to the contractor's laboratory as QC samples and to the COE and EPA/TDEC laboratories as QA samples. The samples will be sent to the following address:

COE Laboratory Missouri River Division 420 South 18th Street Omaha, Nebraska 68102

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Samples	ethussee	Dup <sup>3</sup> -				- 			- <del> </del> -     -	-	-	-}	-   .						VOC = volatile organic compound	SVOC = semivolatile organic compound	FAH = polyruclear aromatic hydrocarbon
Table 6-1 Summary of Field and QC Samples OU-4, Site 57 Defense Deput Mcmphis, Tennessee	of Memphis, T	Samples	6		57	53	0	. 9	   v	, ,		-		Samolec et ear	WW.	tvent.			>	50 0	
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	Sample Matrix		Soil				,	-		Groundwater <sup>2</sup>				OC Level 2 soil samples assume three sumples at eac	<sup>2</sup> One groundwater samples from STB-12. One groundwater sample will be collected from each of the 2 new and 7 existing MWs. <sup>3</sup> Dupficates will be collected at the rate of 10 percent per analyte/matrix. <sup>4</sup> Trip bluttks will accompany every shipment of VOCs. <sup>5</sup> Equipment misates will be collected at the rate of 5 percent per analyte/matrix.	MS/MSDs will be collected at the rate of 5 percent per analyte/matrix.	Notes:	QC = quality control	Dup = duplicate	MS/MSD = matrix spike/matrix spike duplicate	

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Table 6-2	mmary of Field and QC Samp Fluvial Aquifer Investigation fense Depot Mentphis, Tennes	Samples		5	01	45	01	4	4			vells, vells, l be run for V( d event. csampling of f					t AL =
	Stammary of Field and QC Samples Fluvial Aquifer Investigation Defense Dupot Memphis, Tennessee	Method		SW8240	SWR270	SW6010		SW8010-8020/ SW8100	SW6010		Al- Ten new mooi	<sup>10 S VOCs, and 35 unfiltered metals will be collected from existing monitoring wells. [A-1] will be analyzed for VOCs and metals. Twenty seven VOCs, Dupficates will be collected at the rate of 10 percent per analyte/matrix. Trip blanks will accompany every shipment of VOCs and TCL samples and will be run for VOCs and TCL analysis, respectively. Field blanks will be collected at the rate of 5 percent per analyte/matrix. Field blanks will be collected at the rate of 5 percent per analyte/matrix. MS/MSDs will be collected at the rate of 5 percent per analyte/matrix. Optional samples are for four additional Fluvial Aquifer wells (TCL/TAL) and resampling of four additional existing wells (VOC, SVOC, and unfiltered metals).</sup>					
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#### Appendix B – Table of Contents Summary of Previous Investigations Defense Depot Memphis, Tennessee

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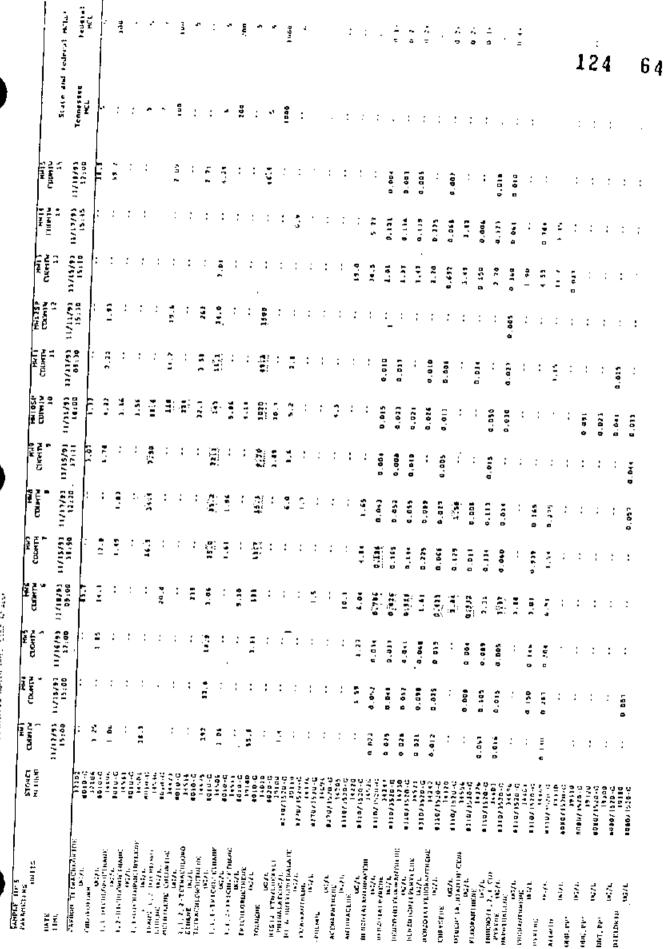
Study Ticle	Study Investigator	Date of Investigation	Purpose of Investigation	Appendix B Page Numbers
Groundwater Monitoring Results for DDMT	Environmental Science & Engineering, Inc. (ESE)	September 1993	Groundwater sampling	8-2
Remedial Investigation/ Feasibility Study	Law Environmental	August 1990	Groundwater, soil, surface water, and sediment sampling	B-10

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# Groundwater Monitoring Results for DDMT Environmental Science & Engineering, Inc. September 1993

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Remedial Investigation/Feasibility Study Law Environmental August 1990

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	PHASE 0	1		 	1	!	' -			-												-	ł	
	AEHA- 1907	i		ð	20	ł	0 			z L								NT .	ц	LN .	Z	NT	ΝŢ	-

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## POSITIVE RESULTS IN GROUND WATER DUNN FIELD AREA DEFENSE DEPOT MEMPHIS TENNESSEE

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NONVOLATILE METALS (UD)

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								0 (Juo		= Velue	ices than	입	Intract R	G (norganic) = Value (see than the Contract Required Detection	Detection	-							]
(v) we distriction between conditions (ii) and Chromium (vi)	namum (iii) and	Chromit						Ę	ni (CRD	A) but p	ranter (he	an the la	1 thrum 0	Limit (CRDL) but greater (han the instrument Datection timit (D1)		( IDI)							
								8 (Örg	e (oluta	Found	n methou	d block											
(i) MCL/ Action Level								0 = 0	antitiod	th prian	alveis al		100 V वीस	0 = Identified in an analysis at a secondary dilution factor	lar 1								
(g) MCLO, Primary MCL is a Treatment Tachtrique	<b>Treatment Tach</b>	onbi							timated	vatuo lo	as then t	the ear		- Estimated value less than the example grantingion that but		-							
(ii) Secondary MCL								1010	arealer than 2 ata	2.010													
PLT = Wall not tosted for this parameter due to one of following reasons:	parameter due to	one of K	atowing real					2	es polic	molo rec	N = 300/00 tempo recovery not within control timula	ol will <del>à</del>											
<ol> <li>Well not constructed yet</li> </ol>	-		I						Not detected	artari				í									
(2) Well constructed but atmpte not analyzed for this parameter	mple not enablized	d for this	Dammetor					NA D	NA - Noi Avallado	Vaka.													
AEHA 1987 - Groundwater serantes analyzed using EPA Mathods 824, 625, 608, 200	samnios analyzed	uaino El	PA Mathods	824.62	6 609 5	00.7 94			00														
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### POSITIVE RESULTS IN GROUND WATER DUNN FIELD – PERCHED WATER TABLE DEFENSE DEPOT MEMPHIS TENNESSEE



### NONHALOGENATED VOLATILES (ug/l)

### NONHALOGENATED SEMIVOLATILES (ug/l)

bis(2–Ethylhexyl) ohthalate	 51
	 . uu i

### VOLATILE METALS (ug/l)

Areenic	50	100
Lead	<b>50/</b> 15 (b)	185N
Mercury	2	.5
Selenium		90

### NONVOLATILE METALS (ug/I)

Antimony		90N
Berium	2000	475N
Cadmium	5	12N
Chromium (c)	100	TISN
Copper	1300 (d)	127N
Nickal	100	48N
Zine	5000 (h)	299N

Reference - Al Report (1990)

(b) MCL/ Action Level

(c) No distinction between Chromium III and Chromium VI.

(d) MCLG. Primary MCL is Treatment Technique.

(h) Secondery MCL

J = Estimated value less than the sample quantitation  $\gamma^{*}$  limit, but greater than zero,

N = Spiked sample recovery not within control limits.

NA = Not Available

MAIN INSTALLATION – FLUVIAL AQUIFER POSITIVE RESULTS IN GROUND WATER DEFENSE DEPOT MEMPHIS TENNESSEE

-										•.		
PARAMETER (UG/L) DATE MWIG	IB MCI	L MW17	MW19	MW20	MW21	MW22	MW23	MW24	WW25	MW26	<b>BEWM</b>	96WW

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PHASEI	PHASE IF
Carbon Tetrachloride	

Caroon 161(8chloride	PHASEL	1												
				1		1		 	ł		2.1	Ľ		
				1		1	I				;	;		
Chloroform							   	 	1	1		w		
		1	100(c)	1	1	 	1	ł	1		 	.		
	PHASE II	ļ		ļ						l	1	2	<b>,</b>	1
Methylena chlorida							1	1	1	1	1	2.1	;	E 
	PHAGE	1	-	ļ	1 		1						1	
	PHASE 1									<b>!</b>	1	18.1	<b>;</b> 	1
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I etrachiprothene	LUNAHU		v					ĺ			'	•		1
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	PHASEI	ł		;			9				,	3		1
Trichbroethans	DUACT	   	ĺ				2	2	1		~	n	1	2
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NONHALOGENATED VOLATILES (ug/)

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NONHALOGENATED SEMINOLATILES (ug/)

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	PHACE		PHASE II	PHACE 1		PHASEL			DUACCI		PHA SC II				
	đ		t,	a		Å,									
	da			ats.		N - Nitrosodiphenylamine			bist2 –Fibulanda nhihatata					tho fi	
	ledido l			ohtha		ipheny			head			!		FTALS	;
	i Oi – n – butvi ohihalvia			Di n octvi ohthelatv		lit a soc	5		TAN LE C					VOLATILE METALS 4460	Ē
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	PHASE I	33	20	324	80		;							!	- `
-	PHASE II	ĝ		1		5	08	000	00.0		1		1	1	7
		\$						111	3		-	2	;	1	
		2	(0) c L/oc	205	4	<b>30</b> •	.26	2	334	152*	128				
	PHASE II	80	_	1	1	S	<b>4</b>	000							
			† 			3			140		2	3	1	2	•
		;	N	6.8	1	26,	Ņ	4.4N	1.6N	¥.	1.7	4N			C
	PHASE II	1		ł	 	1	-	U,	-					I	·
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MAIN INSTALLATION – FLUVIAL AQUIFER POSITIVE RESULTS IN GROUND WATER DEFENSE DEPOT MEMPHIS TENNESSEE

		BACKGRC	ONIC		م بنیانی مرابق مرابق									
PARAMETER (UG/L) NONVOLATILE METALS (4007)	DATE	MW18	MCL	MW17	GIWM	MW20	MW21	MW22	MW23	MW24	MW25	MW26	8EWM	MW39
Antimeny	PHASEI		a	170										
	PHASE		- -	Ē	1	1	! 	ł	ł		<b>!</b>	1		[
Barium	PHASE	218	2002		1 92				;		8	20	1	1
	PHASE II	410		190		142	8	EPE	567	167	1960	908	1	
Cadmium	PHASEI	;	ļ.		   	200			065		410	380	BO	130

Antimony	PHASE	;	5	470		ĺ		1
	PHASE II		,	1		1	1	(
Barium	PHASEI	218	0006	603	196			
	PHASE II	110				1	R.	543
Cadmium			ļ	190	5	280	540	360
		;	ŝ	•	9	•N11	.NV	14N
	PHASE I	<b>I</b>		1		(	.	•
Chemium (d)	PLASEI	3	8	408	2	Ē		a
	PHASE II	50		9	Ş	1 8		
Conner					2	 8		200
		198	1300 (i)	322	108	242	148	326
	PHASE II	8		3	08	130	3	150
	PHASE	29	ŝ	238	1	35	   <del>1</del>	
	PHASE	₽ ₽ 		1	!	Ş	6	001
2011/7	PHASE	116	5000 (h)	910	65	150	242	594
	PHASE	8		180	53	140	061	750
Kelefence – Hi Heand (1990)								

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MCL - SDWA MaxImum Cantainment Lovel (c) Total trihalomethenes

(d) No distinction between Chromium (If and Chromium VI.

(e) MCL/ Action Level

(i) MCLG. Primary MCL is Treatment Technique. (h) Secondary MCL

B (thorganic) = Value less than the Contract Required Detection Limit (CRDL) but greater than the Instrument Detection Limit (rDL).

B (Organic) = Found in method blank.

 $J={\sf Estimated}$  value less then the sample quantitation limit but gradier than zero.

N = Spiked sample recovery not within control limits. Duplicate analysis not within control limits.

-- = Not detected.

NA - Nol Available.

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### POSITIVE RESULTS IN GROUNDWATER MEMPHIS SAND AQUIFER DEFENSE DEPOT MEMPHIS TENNESSEE

PARAMETER	DATE	MCL	MW36	MW37

### NONHALOGENATED VOLATILES (ug/I)

Acetone	PHASE II	 ;	
2 - Butanone		 	3500D
	PHASE II	4J	
<u>4 – Methyl – 2 – pentenone</u>	PHASE II		•
		 	8.1

### NONHALOGENATED SEMIVOLATILES (ug/l)

M Million			
<u>_N-Nitrosodiphenylemine</u>	PHASE !!	 1 10 1	
		 383	i

### NONVOLATILE METALS (ug/l)

Barium				
	PHASE II	2000	410	380
Chromium (c)	PHASE (	100		20
Copper	PHASE I)	1300 (出)		
Nickel	PHASE II	• • •	10	20
Zinc		100		20
	<u>PHASE II</u>	5000 (e)	73	150

Reference Ri Reoprt (1990)

MCL – SDWA Maximum Containment Level

(c) No distinction between Chromium III and Chromium VI.

(d) MCLG. Primary MCL is Treatment Technique.

(e) Secondary MCL

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

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

-- = Not detected.

NA = Not Available.

### POSITIVE RESULTS IN SURFACE SOILS BUILDING 629 DEFENSE DEPOT MEMPHIS TENNESSEE

	PHAS	E I	PHASE	41
PARAMETER	SSIO	\$\$11	SS42	SS43
HALOGENATED VOLATILES ug/kg		<b>.</b>	<b>.</b>	
1,1,2- Trichloroethene			11	
Methylene chloride	188	138	SB	78
Tetrachlorgethene			3.	
Trichloroethene			2100E	
ONHALOGENATED VOLATILES ug/kg			_	
Acetone	67	95	24	21
Carbon disulfide	23	5		<b>-</b> -
Toluene	6J	18	<u> </u> 4_	7
Toluene	6J	18	4.1	7
	6J	<u>18</u>	<u> </u>	
ALOGENATED SEMIVOLATILES ug/kg			······································	7 270J
ALOGENATED SEMIVOLATILES ug/kg Pentachlerophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthelate			······································	2701
ALOGENATED SEMIVOLATILES ug/kg Pentachlerophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthalate Dibenzofuran			······································	2701
ALOGENATED SEMIVOLATILES ug/kg Pentachlerophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthelate	500.			270J 1300BJ
ALOGENATED SEMIVOLATILES ug/kg Pentachlerophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthalate Dibenzofuran	500J 1300J	 9700		270J 1300BJ
ALOGENATED SEMIVOLATILES ug/kg Pentachlorophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthalate Dibenzofuran V – Nitrosodiphenylamine	500J 1300J	 9700		270J 1300BJ
ALOGENATED SEMIVOLATILES ug/kg Pentachterophenol ONHALOGENATED SEMIVOLATILES ug/kg pis(2 – Ethylhexyl) phthalate Dibenzofuran V – Nitrosodiphenylamine Polynuclear Aromatic	500J 1300J	 9700		270J 1300BJ
ALOGENATED SEMIVOLATILES ug/kg Pentachlorophenol ONHALOGENATED SEMIVOLATILES ug/kg bis(2 – Ethylhexyl) phthalate Dibenzofuran V – Nitrosodiphenylamine Polynuclear Aromatic Hydrocarbons (PAHs)	500J 1300J 510JB	9700 1900/B		270J 1300BJ

bis(2-Ethylhexyl) phthelate	500./	~-		1300BJ
Dibanzofuran	1300J	9700	24000J	340J
N – Nitrosodiphenyiamine	510JB	1900./8		
Polynuciear Aromatic				
Hydrocarbons (PAHs)			İ	
2-Methylnaphthalene	500,1	2000.1	i	
Acenaphthene	2300	20000	64000J	1100J
Acenzphthylene	550,	1900.1		
Anthracene	4400	26000	130000J	1500
Benzo(e)anthracene	9500	1100000	970000	5300
Senzo(a)py≀e∩e	8300	100000D	450000	5200
Benzo(b)fluoranthene	9500	110000D	540000	9300
Benzo(g.h.i)perytene	5300	850000	360000	2900
Benzo(k)fluoranthene	10000	920000	450000	2300
Chrysene	8900	120000D	620000	6800
Dibenzo(s.h)anthracens	1400J	9800	160000	1400
Ruoranihene	23000	2800000	850000	9300
Fluorene	2500	16000	47D00J	880.1
Indeno(1,2,3-cd)pyrene	4900	720000	310000	2800
Naphthalene	1900	4600	010000	1300
Phenanthrene	19000	2000000	620000	7000
Pyrene	16000	180000D	870000	<u>9</u> 300
	130,050	1,429,300	6,475,000	63.210

### POSITIVE RESULTS IN SURFACE SOILS **BUILDING 629** DEFENSE DEPOT MEMPHIS TENNESSEE

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		PHASI	E )	PHASE	
PARAMETER	·	\$\$10	5511	\$542	SS43
PESTICIDES ug/kg				<u></u>	
4,4'-000 4,4'-00E 4,4'-001		2100X 4500D	3500 39000D	1400JX 90000J	3200J 25000J

4,4'-DDT	67000	590000	L00006	25000J
elphe-Chiordane		590 <b>00D</b>	7900DJ	710DJ
beta-BHC	4000D			
Dieldzin			1900XZ	
Endrin kerone	240			45000
gamma-Chlordane	_ <b></b>	120000		
]	40000	2400J	520J	
Heptachior	120			!
Heptachior spoxide	250			1
Methoxychior	f		1505.1	

### VOLATILE METALS mg/kg

Arsenic	·			
	12	20	12	26
Lead	81	1680	<b>,</b>	ſ
Mercury	0.060		1120	126
	0.060	0.84	1.3	I

### NONVOLATILE METALS mg/kg

Antimony		·· <u> </u>	· · · · · · · · · · · · · · · · · · ·	
Barium		88		
Cadmium	57.6	343	108	70.8
	1.1	6.0	11.8	
Chromium ••	24	135	39	15
Copper	16	135	705	
Nickel				, 15
Silver	20		367	5.0
Sne	3.0	9.0	/ <b></b>	
	63.4	960	10400	84.8

### Reference - Ri Report (1990)

na - Not Available

8 (Inorganic) = Value less than the Contract Required Detection Umit (CRDL), but greater than the

Instrument Detection Limit (IDL). 8 (Organic) = Found in method blank.

 $\mathbf{D} = I$ dentified in an analysis at a secondary dilution factor.

E = Concentration exceeded the calibration range of the GC/MS instrument.

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

X = Estimated value due to a confirmed compound which is off-scale in both columns.

\*\* = No distinction between Chromium (//I) and Chromium (VI)

-- = Not detected.

POSITIVE RESULTS IN SURSURIACE SOLIS           POSITIVE RESULTS IN SURSURIACE SOLIS           District         District Result           District         Milman           Particlen         STB-1-1         STB-1-2         STB-2-1         STB-2-1         STB-2-1         STB-2-1         STB-2-1 <thstb-2-1< th="">         STB-2-2         STB-</thstb-2-1<>	
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# POSITIVE RESULTS IN SUBSURFACE SOILS DEFENSE DEPOT MEMPHIS TENNESSE

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