



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 134



IN REPLY
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134

Nov 30, 1995

DDMT-DE

Mr. Terry Templeton, P.G.
Tennessee Department of Environment and Conservation
Division of Superfund
2510 Mt. Moriah
Suite E-645
Memphis, TN 38115

Dear Mr. Templeton:

We received your letter dated November 17, 1995, regarding comments on the final field sampling plans for Operable Units (OU) 1 through 4. We understand that you and Ms. Leslie Shannon of CH2M HILL discussed many of these and other comments, and that she briefed you on the history and discussions pertaining to these issues that occurred prior to your assignment to this project.

You also indicated to Ms. Shannon that in some cases an acknowledgment of the comment would be sufficient, and in one or two cases revisions would have to be issued. Our responses to your comments (see attached) reflect this understanding, and are numbered to correspond to the numbered comments in your letter.

For more information please contact me at (901) 775-6372.

Sincerely,

HAROLD ROACH
Environmental Engineer

Attachments

cc:

EPA (D. Spariosu)
ASCE-WP (M. Dobbs)
HSHB-ME-SR (D. Druck)
DDMT-D
CEHND-PM-MD (J. Savage)

Response to TDEC Comments

Final OU-1 FSP

1. We acknowledge that the acronym "HRS" was improperly defined in the acronym list, and should have been defined as "Hazard Ranking System."
2. Section 1.5, last paragraph, page 1-8--SSFSP is a correct acronym, and stands for "Screening Sites Field Sampling Plan". It is defined in the SSFSP, but was omitted from the acronym list of this FSP.
3. Figures 2-8 and 2-9, pages 2-12 and 2-13--The data presented on these two figures are not incorrect, just somewhat redundant. Because of the multiple changes in pagination, figure number changes, and table of contents changes resulting from omitting one of these figures, it is proposed to leave them as is.
4. Section 2.7, first paragraph, page 2-18--The word "artesian" was misspelled.
5. Section 2.8.1, Figure 2-12, page 2-19 (text) and 2-20 (figure)--CH2M HILL had previously received a comment that questioned whether more recent planning data were available. CH2M HILL contacted the Memphis and Shelby County Office of Planning and Development, and was told that the land use map we had was the most current. If TDEC determines that maps with more recent data are available, we can issue them in the RI Report.
6. Section 3.5.2, first paragraph, page 3-9--This comment actually refers to changes in tables in the *Generic RI/FS Work Plan*, which are general reference tables for all of the work plans. CH2M HILL agreed to reissue these tables with the changes noted, because work at all OUs will be affected by them.

Table 3-7 of the *Generic RI/FS Work Plan* will be modified by deleting the column titled "TN Guidance Level" and the associated footnote "f". Table 3-8 will be modified by changing footnote "d" to read: "General Water Quality Criteria, Chapter 1200-4-3, Rules of the Tennessee Department of Environment and Conservation, Division of Water Pollution Control." The tables as amended are attached to this letter. They will be issued to all work plan recipients with the next addendum to the work plans.

Final OU-2 and OU-3 FSPs

No comments.

Final OU-4 FSP

1. Section 4.3.2, Table 4-1 (formerly Table 4-2), page 4-9--The Division is correct in that the intention was to change the title of the table (not the figure) to read: "Maximum Concentration of Contaminants Found in Dunn Field Fluvial Aquifer Groundwater."

2. Section 4.3.2, Tables 4-2 and 4-3 (formerly Tables 4-3 and 4-4), pp. 4-10 and 4-11--The Tennessee guidance levels will be removed from Table 4-2, as shown in the attached table. This revised table will be issued with the next addendum. No Tennessee guidance levels are in the current Table 4-3.
3. Section 4.4.1, page 4-16--The original question concerned criteria for recognizing when drilling into the top of the Jackson Claiborne Group had occurred. Criteria were outlined in the response to comments, but were not included in the revised text of the work plan. This text (slightly modified to accommodate the use of Rotosonic drilling) will be included in the next addendum.

"The onsite geologist will have the boring logs of adjacent wells, geologic cross sections, and Figure 2-17 of the *Generic RI/FS Work Plan* when drilling. Figure 2-17 has compiled all of the existing data in the near vicinity of DDMT into a structure contour map of the top of the Jackson Formation/Upper Claiborne Group. This information will give the onsite geologist an idea of anticipated depth to the top of the unit prior to drilling. Also, CEHND, TDEC, EPA, and USGS representatives will be present during the drilling of Well U.

"The geologist (and others) will examine the drill cuttings as they are recovered, and make an immediate determination of where the borehole is within the stratigraphic section. As the borehole is penetrated through the three members of the Fluvial Deposits, the geologist will be watching for a coarsening of the sand sequence with the characteristic gravel lenses. This indicates the base of the Fluvial Deposits. The geologist will then look for the distinctive stiff, gray to orange, low to high plasticity lignitic clay.

"Clay lenses or seams within the gravelly sand sequence may be distinguished from the clay of the Jackson Formation/Upper Claiborne Group by color, absence of lignite, and possibly by plasticity. Also, continuous split spoons (or other comparable method) will be used after a depth of 75 feet, or Rotosonic drilling methods may be used to provide a continuous lithologic 'core'."

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