



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

August 02, 2021

Mr. James Foster
Base Realignment and Closure Division (ACSIM-ODB)
2530 Crystal Drive (Taylor Building), Room 5000
Arlington, VA 22202-3940

Dear Mr. Foster:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of Army, Defense Depot of Memphis, Tennessee, 2020 Supplemental Remedial Investigation Comment Responses to EPA Comments.

EPA provides conditional approval of the above mentioned document with the understanding that EPA is NOT providing approval or agreement that the SRI is complete. The remaining lingering questions and need for additional data and conversation are noted in the below responses and is noted in previously conditionally approved SRI reports. Should you have any questions or concerns, please feel free to call me at on my cell number 404-229-9500.

Sincerely,

A handwritten signature in cursive script that reads "Diedre Lloyd".

Diedre Lloyd
Remedial Project Manager
Restoration & Sustainability Branch
Superfund & Emergency Management Division
61 Forsyth Street, Region 4
Atlanta, GA 30303

cc: Mr. James Foster, (Signed Original), United Parcel Service, Return Receipt
Mr. Jamie A. Woods, PG, Tennessee, Department of Environment and Conservation, Memphis
Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133-4119
Ms. Joan Hutton, CALIBRE, 3898 Mountain View Road, Kennesaw, GA 30152
Mr. Thomas Holmes, HDR Environmental, P.O. Box 728, Highlands, NC 28741

Above Letter was also emailed to list below and can be found at the e-file location noted below.

ec: james.c.foster10.civ@mail.mil; jamie.woods@tn.gov; joan.hutton@calibresys.com;
thomas.holmes@hdrinc.com;

e-bbc: Terrell.tina@epa.gov

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U. S. EPA 2ND RESPONSE TO U. S. ARMY COMMENT RESPONSES
ON THE 2020 SUPPLEMENTAL REMEDIAL INVESTIGATION REPORT
REVISION 0

DATED SEPTEMBER 2020

DEFENSE DEPOT OF MEMPHIS, TENNESSEE

U.S. EPA Response to General Comment 1a: The response to comment is adequate. Please ensure the revised SRI Report includes language associated with U.S. Army comments response.

U.S. EPA Response to General Comment 1b: *The response does not adequately address the comment.* U.S. EPA has repeatedly requested transport data to support future cleanup timeframes for the anticipated ESD or AROD, as appropriate.

U.S. EPA Response to General Comment 2a: The response to comment is adequate with the understanding that the Feasibility Study (FS) Report will provide an evaluation of remedial technologies and the estimated time to achieve RAOs, which is why the modeling data is requested in the above comment. As such, the concern regarding whether adequate populations of RD mediating microbes are present and the need for a biological assessment can be revisited during the FS.

U.S. EPA Response to General Comment 3a: *The response does not address the comment.* The intent of the comment was to address the uncertainty of historical groundwater gradient and flow directions and how this may impact the currently developed CSM and the interpretation regarding on-site plume migration from presumed upgradient sources. However, the response indicates water level measurements were used to prepare groundwater elevation contour maps for the MI RI in 2000 and for the MI LTM since 2004 and there is no indication of a reversal in groundwater flow direction. Additional response is required to address the uncertainty regarding the potential for reversal of historical groundwater gradient and flow directions due to development of regional and subsidiary cones of depression due to pumping of municipal and industrial wells. An updated sitewide CSM is necessary prior to FS, inclusive of VI CSM.

U.S. EPA Response to General Comment 4a: *The response does not address the comment.* The comment requests new soil RGs be developed for the MI based on the updated CSM and whether an AROD or ESD are undertaken. However, the response indicates use of the soil RGs was demonstrated to be effective on Dunn Field and believed to be effective on the MI as well. The response also states the only exceptionsand an area along the west-central boundary of Dunn Field (MW-06) where MCLs have been exceeded for TCE and TeCA (October 2020). As such, it is uncertain whether the current Dunn Field soil RGs will be protective across the DDMT.

U.S. EPA Response to General Comment 5a: *The response does not address the comment.* The comment indicates based on an improved understanding of the groundwater flow and plume delineation, the results of the previous modeling efforts are no longer valid. However, the response indicates further flow and transport modeling is not necessary. The response further indicates the finite-source model showed the concentrations reaching the MAQ after 5 years were 16 µg/L for PCE and 10 µg/L for TCE; both concentrations are higher than current concentrations at MW-254. It is noted MW-254 is the furthest downgradient MAQ well and the most current May 2020 TCE concentrations was 5.96 µg/L

exceeding the MCL and therefore, the lateral extent in the MAQ is currently not defined. The response to General Comment 1b indicates that groundwater flow and transport modeling would only be useful to provide an improved estimate of the groundwater flow in the MAQ from the DDMT to the Allen Well Field and no additional modeling is not considered necessary at this time. As such, additional groundwater flow and transport efforts could help determine lateral extent of MCL exceedances in the MAQ to ensure that the contaminated groundwater migration is under control and stabilized. EPA has repeatedly requested model transport data to determine RAOs and cleanup timeline. Each request has been declined.

EPA cannot approve the SRI is complete until these comments are addressed.