



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 179

Woodward-Clyde Federal Services

Engineering & sciences applied to the earth & its environment



179 1

File: 212.700.a
C.G.

179

September 4, 1996

DRAFT

Christine Kartman
Environmental Office
2163 Airways Boulevard
Memphis, TN 38114

Subject: Comment Response Package
Draft Environmental Baseline Survey Report
Defense Distribution Depot Memphis, Tennessee

Dear Ms. Kartman:

In accordance with the Statement of Work for the U.S. Army Base Realignment and Closure (BRAC) 95 Program, Contract No. DACA67-95-D-1001, Woodward-Clyde is responding to comments received on the Draft EBS Report for the Defense Distribution Depot, dated May 24, 1996. Woodward-Clyde has received comments on the Draft EBS Report from the installation; U.S. Environmental Protection Agency (EPA), State of Tennessee, U.S. Army Environmental Center (AEC), U.S. Army Corps of Engineers (USACE), Mobile District and Memphis Depot Redevelopment Agency.

Woodward-Clyde has prepared a Draft Comment Response Package (CRP) which is enclosed for your review. The CRP will be included as Appendix A in the Draft Final EBS Report. To effect consistency in response to comments at all installations and provide further opportunity to gain regulatory concurrence on the environmental condition of property, DLA, BEC, GPM, and USACE are requested to review the Draft CRP and send their comments to the GPM, who will send them to Woodward-Clyde. Responses to the Draft CRP will be incorporated into the Draft Final EBS Report. The Draft Final EBS Report (including a Draft Final CRP) will be provided to DLA, the BEC, GPM, USACE, and AEC as well as regulatory members of the BRAC Cleanup Team (BCT) for review. After an initial review, the BEC should call a meeting of the BCT to address the Draft Final EBS Report. The Final EBS Report will be prepared after this meeting has occurred. The guidance for this additional review and comment period has been prepared by USACE and is included in Attachment A.

EE9518MD/RES-COML1TR 9/4/96(11:21 AM)/BRAC/MD/EBS/1

**Woodward-Clyde
Federal Services**

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Christine Kartman
September 4, 1996
Page 2

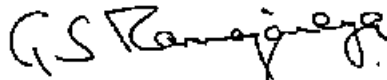
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The schedule for preparation of the documents is provided below:

- | | |
|--|-----------|
| 1. Woodward-Clyde mails Draft CRP | 4 Sep 96 |
| 2. DLA, BEC, USACE, and AEC review Draft CRP and
send comments to GPM | 20 Sep 96 |
| 3. GPM consolidates comments and sends to Woodward-Clyde | 24 Sep 96 |
| 4. Woodward-Clyde mails Draft Final EBS
and CERFA Letter Reports | 15 Oct 96 |
| 5. 30-Day Regulatory Review is completed | 15 Nov 96 |
| 6. Woodward-Clyde mails Final EBS and
CERFA Letter Reports | 3 Dec 96 |

If you have any questions during this time, please contact me at (206) 343-7933. My fax number is (206) 343-0513.

Sincerely,



Geoffrey C. Compeau, Ph.D.
Project Manager

GCC:msj

Enclosure

cc: Kurt Braun, GPM, U.S. Army Corps of Engineers
Mike Nelson, USACE, Seattle District
Kenneth Wiggans, U.S. AEC
Mike Dobbs, DLA Region East

MTB 16 OCT 96 Review EDS

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ATTACHMENT A

**GUIDANCE MEMORANDUM
RESOLUTION OF DRAFT EBS COMMENTS, BRAC 95 INSTALLATIONS
DATED 21 AUGUST 1996**

Prepared by:

**Department of the Army
U.S. Army Corps of Engineers, Seattle District
Seattle, Washington 98124**



EDLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-2255

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CENPS-EN-GT-EM (200-1a)

21 August 1996

GUIDANCE MEMORANDUM

SUBJECT: Resolution of Draft EBS Comments
BRAC95 Installations

1. Our Contractor is preparing and submitting Comment Response Packages addressing all comments on the Draft EBS and CERFA Letter Report. When the contract was awarded, no clear direction or process had been established for resolving comments on the EBS and CERFA documents.
2. As you are aware, many of the regulator's comments on the documents express a concern over the use of "CERCLA" and "non-CERCLA" to describe the parcels. This is particularly true in the cases of lead-based paint residue that may be present in the soil around residential dwellings. Regulators perceive this to be a "CERCLA release" while DoD BRAC guidance is clear that this is a "non-CERCLA issue". Some of the difficulty surrounds the perception on the part of regulators that, in the worst case, categorizing parcels as Category 1 allows unrestricted transfer of the parcel even if impacted by some qualifying issue such as lead-based paint. DoD guidance is clear that these issues will be fully disclosed or addressed prior to transfer.
3. During preparation of the EBS and CERFA documents, the contractor gathered data on storage, release, and disposal of hazardous substances and petroleum products and their derivatives. In addition, data was gathered on non-CERCLA related environmental or safety issues. These non-CERCLA related issues may be conditions which are known or suspected to exist on the BRAC property which would limit or preclude the transfer of the property for unrestricted use. Such conditions would include the presence of asbestos, radon, unexploded ordnance, lead based paint, and PCBs.
4. The goal of the EBS and CERFA process is obtaining regulatory concurrence on the environmental condition of property categories. This will require a response to comments; clarification of DoD policy issues concerning lead-base paint, asbestos, UXO, and etc.; and a discussion with the regulators at an appropriate time after the response to comments has been reviewed by the regulators.
5. Working with the AEC staff and the Contractor we have developed the following activities which should provide a coordinated response to the regulator's concerns and an opportunity to meet, discuss, and, quite possibly, reach consensus on the comments and our response:
 - Within 15 calendar days (CD) of receipt of all comments on the Draft EBS and CERFA Letter Report for each installation, the Contractor will prepare a Draft Comment Response Package (Draft CRP) and send the response package to DLA, BEC, AEC and Corps' Geographic Project Manager (GPM) for a 15 CD review and comment. The reviewers will send their comments on the Draft CRP to the GPM who will send them to the contractor.
 - Within 21 CD of receipt of comments on the Draft CRP, the contractor will prepare a Final CRP and the Draft Final EBS and CERFA Letter Report. The two documents will be sent to DLA, BEC, AEC, GPM, and Seattle District Project Manager for review.

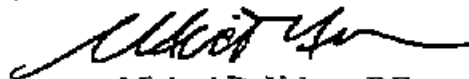
CENPS-EN-GT-EM

21 August 1996

SUBJECT: Resolution of Draft EBS Comments BRAC95 Installations

- The BEC will forward the Final CRP and the Draft Final EBS and CERFA Letter Report to the regulators for a 30 CD review. About ten days into the review, the BEC will call a BCT meeting attended by the regulators, BEC, GPM, and a Contractor representative to discuss and hopefully reach a consensus on the comments and remaining issues. Upon completion of the review, the regulators will submit comments to the GPM who will send them to the contractor.
- Within 5 days of the BCT meeting, the contractor will prepare a memorandum of record of the meeting which will be submitted to the DLA, BEC, AEC, GPM and Seattle District PM.
- The contractor will prepare and distribute an updated CRP and the Final EBS and CERFA Letter Report as required in the contract. As with the Draft EBS and CERFA Letter Report, the BEC will send the final documents to the regulators.

If you have any questions or need additional information, please call me at (206) 764-3458 or FAX (206) 764-6795.



Michael D. Nelson, P.E.
BRAC 95 Coordinator

APPENDIX A
COMMENT RESPONSE PACKAGE

**RESPONSES TO COMMENTS ON THE
DEFENSE DISTRIBUTION DEPOT MEMPHIS, TENNESSEE
DRAFT ENVIRONMENTAL BASELINE SURVEY REPORT
DATED MAY 24, 1996**

APPENDIX A COMMENT RESPONSE PACKAGE

Appendix A presents the comments Woodward-Clyde Federal Services received on the *Defense Distribution Depot Memphis, Tennessee Draft Environmental Baseline Survey Report*, dated May 24, 1996, and the responses to these comments.

The comments have been typed verbatim and may include misspellings, grammatical errors, format inconsistencies, internal agency numbering systems, etc. Each comment and response has been sequentially numbered (A-1, A-2, A-3, etc.). This numbering system is used to reference previous comments or a response that may clarify a previously addressed issue.

The comments have been organized by agency and are separated by sections (A.1, A.2, A.3, etc.). The comments are presented in the following order:

- Installation
- U.S. Environmental Protection Agency
- State of Tennessee
- U.S. Army Materiel Command
- U.S. Army Environmental Center
- U.S. Army Corps of Engineers
- Other Agencies and Organizations

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

A.1 RESPONSES TO INSTALLATION COMMENTS ON THE DRAFT EBS REPORT**A.1.1 RESPONSES TO BRAC ENVIRONMENTAL COORDINATOR COMMENTS ON THE DRAFT EBS REPORT**

ENTITY: Defense Distribution Depot Memphis

INDIVIDUAL: Christine Kartman

TITLE: BRAC Environmental Coordinator

DATE: July 18, 1996

General Comments:

Comment A-1:

1. Throughout text ensure MDRA is spelled out correctly: Memphis Depot Redevelopment Agency.

Response:

Comment noted. The text has been revised accordingly.

Comment A-2:

2. Throughout document change Defense Depot Memphis, Tennessee to Defense Distribution Depot Memphis, Tennessee.

Response:

Comment noted. The text has been revised accordingly.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Executive Summary:**Comment A-3:**

1. Page i, 1st para: Insert Distribution between Defense and Depot.

Response:

Comment noted. The text will be revised accordingly.

Comment A-4:

2. Page i, 3rd para: Delete "approximately".

Response:

Comment noted. The text has been revised accordingly.

Comment A-5:

3. Page ii, 1st para, last 2 sentences: Verify information with BRAC Closure Officer.

Response:

Comment noted. The information has been verified. The text has been revised accordingly.

Comment A-6:

4. Page ii, 3rd para: Delete "approximately" describing "642 acres identified for transfer". The text indicates 179.25 acres, but the table indicates 179.26. Change either to reflect correct acreage. Why isn't any Chemical Warfare Material acreage identified?

Response:

Comment noted. The text has been revised accordingly. CWM acreage is not identified since CWM is not a qualifier.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-7:

5. Acreage Table: Is it 179.26 or 179.25?

Response:

Comment noted. The table has been revised to reflect the correct acreage.

Table of Contents:Comment A-8:

1. Item 3.4.9: Change "Fire Training" to "Fire Fighting" as fire training by the Memphis Fire Department is no longer conducted on DDMT.

Response:

Comment noted. The text has been revised to clarify the issue.

Comment A-9:

2. Item 4.4.5: change Unexploded Ordnance to Chemical Warfare Materials.

Response:

Comment noted. The text has been revised to clarify the issue.

List of Acronyms:Comment A-10:

1. CEHND is now CEHNC: U.S. Army Engineering Huntsville Support Center.

Response:

Comment noted. After further clarification from DDMT personnel, the text has been revised to CEHNC: U.S. Army Engineering and Support Center, Huntsville.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-11:

2. Where is DDMT: Defense Distribution Depot Memphis, Tennessee?

Response:

Comment noted. The acronym DDMT has been added to the acronym list.

Comment A-12:

3. DOD: Department of Defense; no "the"

Response:

Comment noted. The text has been revised accordingly.

Comment A-13:

4. MDRA: Memphis Depot Redevelopment Agency

Response:

Comment noted. The text has been revised accordingly.

Comment A-14:

5. USACDRA's name has changed.

Response:

Comment noted. USACDRA has been changed to PMCD, Program Manager for Chemical Demilitarization.

Section One:

Comment A-15:

1. Page 1-1, 1st para, 1st sentence: Delete second "report".

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The text has been revised accordingly.

Comment A-16:

2. Page 1-3, Section 1.3: Eliminate term BRAC parcel. Redo parcel designations to reflect MDRA parcels. MDRA stands for Memphis Depot Redevelopment Agency.

Response:

Comment noted. The text has been revised accordingly.

Comment A-17:

3. Page 1-4: Eliminate BRAC in Suitable and Not Suitable for Transfer.

Response:

Comment noted. The text has been revised accordingly.

Comment A-18:

4. Page 1-5: Eliminate BRAC parcel in parcel labels

Response:

Comment noted. The text has been revised accordingly.

Comment A-19:

5. Page 1-6, 1st para: Use other qualifier than X since no UXO exists.

Response:

Comment noted. The text has been revised to clarify the issue.

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-20:**

6. page 1-7, 1st para: According to the official property records, the total acres for the main installation is 574 acres. Dunn Field is 68 acres. Verify all figures with BRAC Closure Officer.

Response:

Comment noted. The acreage figures have been verified.

Comment A-21:

7. Page 1-8, 2nd para, 1st sentence: Change to read: "In Memphis and Shelby County..."

Response:

Comment noted. The text has been revised accordingly.

Comment A-22:

8. Page 1-8, para 3: Up-to-date census data should be utilized.

Response:

Comment noted. The text has been revised to reflect up-to-date census data.

Comment A-23:

9. Figure 1-3 and Page 1-12, 1st para: Use updated potentiometric map from 1996 monitoring well sampling effort. Change language to indicate 1996 potentiometric surface map.

Response:

Comment noted. The figure and text have been revised to incorporate the 1996 figure.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Section Two:**Comment A-24:**

1. Existing Document Table, last entry: Should use the Final RI Report dated August 1990.

Response:

Comment noted. The text has been revised accordingly.

Comment A-25:

2. Page 2-4, 3rd & 4th Bullets: Delete references to DDRRC. DDMT held, and still holds, the RCRA permit as a large generator and as a TSD.

Response:

Comment noted. The text has been revised accordingly.

Comment A-26:

3. Page 2-5, Bullets: 1st bullet - find location for spills. 2nd bullet - DDMT was removed from State Superfund in February 1996. 4th bullet - All but 2 USTs have either been closed in place or removed.

Response:

Comment noted. The text has been revised accordingly.

Comment A-27:

4. Page 2-5, Section 2.1.2.1 table: Delete last three air permits. Permits 0209-01P, 0209-02P, and 0209-03P remain in effect. The other three have been closed.

Response:

Comment noted. The text has been revised accordingly.

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-28:**

5. Page 2-9, Section 2.1.5 Interviews table: Johnny Carson's knowledge includes entire installation. Bill Gray's knowledge includes entire installation. Ron Handwerker's knowledge includes entire installation. Ursula Jones works in the Environmental Protection and Safety Office and has knowledge of entire installation. Chris Kartman's knowledge includes entire installation beginning in 1993. Harold Roach's title is Industrial Engineer with the Installation Services organization and his phone number is 775-4904. Tommy Walker's phone number is 775-6394.

Response:

Comment noted. The table has been revised accordingly.

Comment A-29:

6. Table 2-1, Page 5 of 5: Clarify the White Truck Body Used for Flammables Storage. Is this perhaps the Mogas truck? If so, it is not for storage; it is for transporting Mogas to other areas of the installation and filling vehicles.

Response:

Comment noted. The white truck body used for flammable storage is a connex adjacent to Building S195. The table has been revised accordingly.

Section 3:**Comment A-30:**

1. Page 3-2, Section 3.3, 2nd para: Change to Memphis Depot Redevelopment Agency and 36 parcels.

Response:

Comment noted. The text has been revised accordingly.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-31:

2. Page 3-2, Section 3.3.1, 5th bullet: Either delete reference to Golf Course Club House or change to read Former Golf Course Club House.

Response:

Comment noted. The text has been revised to read Former Golf Course Club House.

Comment A-32:

3. Page 3-4, Section 3.3.6: DDMT has concerns about the way information is presented. In places the information seems to reflect current conditions and in others it seems to reflect past conditions. DDMT has concerns about information regarding hazmat storage at locations hazmat is no longer stored at, i.e. X areas, chemical storage for buildings T404, T405, and T406, etc. To reflect current conditions, make the following changes: Change Building 319 to Hazardous Waste/Material and Alcohols. For Bldg S308 delete reference to Hazardous Waste. Building 689 contains material handling equipment and Hazardous Materials awaiting shipment; it is not a storage facility. Building 490 is not a storage facility; it is the central receiving facility where materials come in and are directed to storage warehouses. Building 690 contains material handling equipment and materials awaiting shipment; it is not a storage facility. At Bldg 359 spell out D5W. At Bldg S468 verify waste petroleum product drums. At Bldg S1089, which has two entries, better define miscellaneous chemicals, i.e. paints, solvents, etc. At Bldg S875 verify Hazardous Materials - only overflow POLs are in S875.

Unnumbered should be deleted as it is either not an approved storage area or it is the Mogas truck which does not store flammables, only transports and dispenses.

Response:

Comment noted. The text has been revised accordingly.

Comment A-33:

4. Page 3-6, Open Storage Areas: Are these descriptions reflecting current or past conditions? If so, indicate. Flammables or petroleum products are no longer stored outside in X areas.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE****Response:**

Comment noted. The text has been revised accordingly.

Comment A-34:

5. Page 3-7 through 3-13, Section 3.4: This entire section must have been pulled from an old report without being updated. For example: **Section 3.4** - no pesticides currently stored at Dunn Field; no wood treatment with pentachlorophenol. **Section 3.4.1, page 3-8, 2nd para** - Bldg 629 no longer stores hazmat. **Section 3.4.1, page 3-8, 3rd para** - Bldg 319 is the hazwaste/hazmat and alcohols storage for DRMO. Hazmat requiring controlled temperatures are store in 359. Cyanide compounds were stored in 319. Building 835 has been operational since 1989. **Section 3.4.1, 3rd para** - Class 1 flammable liquids are no longer stored in X areas. We had two fabric buildings. Now, we have one. Building 925, which stores flamliquids (55-gallon drums), built over site of other. The fabric tension building at T267 fell down and was never rebuilt. ETC. ETC. ETC. **Section 3.4.1.2, page 3-9, 1st para** - Hazardous wastes are generated two ways: depot maintenance operations and hazardous materials with expired shelf life. Spill cleanup accounts for a very small amount of waste generated. **2nd para** - DRMO never built the conforming storage facility. DRMO currently stores hazmat in Bldg 319, not 1086.

Response:

Comment noted. The text has been revised accordingly.

Comment A-35:

6. Page 3-9, Section 3.4.2, 1st para: Dunn Field was not a Sanitary landfill.

Response:

Comment noted. The text has been revised accordingly.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-36:

7. Page 3-10, Section 3.4.5, 1st para: DDMT uses only potable water, no industrial water.
3rd para: Potable water no longer tested by Installation Environmental Health Section as they are no longer a tenant.

Response:

Comment noted. The text in the first paragraph has been revised to delete the reference to industrial water. The text in the third paragraph has been deleted.

Comment A-37:

8. Page 3-11, Section 3.4.6, 2nd para: DDMT's current NPDES permit allows for stormwater only. All other sanitary sewer connections have been disconnected. No wastewater, only stormwater which is tested for flow, pH, oils & grease (main installation) plus magnesium and aluminum at Dunn Field.

Response:

Comment noted. The text has been revised accordingly.

Comment A-38:

8. Page 3-12, Section 3.4.8, 1st para, 5th sentence: Change "in Dunn Avenue" to on. Also, verify current conditions.

Response:

Comment noted. The text has been revised accordingly.

Comment A-39:

9. Page 3-12, Section 3.4.9: Lake Danielson was used by MFD until around 1989. DDMT no longer has a firefighting training program even for extinguishers.

APPENDIX A**COMMENT RESPONSE PACKAGE****Response:**

Comment noted. The text has been revised to indicate that these fire training activities were past activities.

Comment A-40:

10. Page 3-12, Section 3.4.10: DDMT has a clinic on-base which provides limited medical services.

Response:

Comment noted. The text has been revised to add the on-base clinic.

Comment A-41:

11. Page 3-12, Section 3.4.11: Delete last two sentences in this paragraph. The housing units are still in use.

Response:

Comment noted. The last two sentences in this paragraph have been deleted.

Comment A-42:

12. Page 3-13, Section 3.5: DDMT offers habitat to ducks and geese at both the pond and the lake. Change reference to "new hazardous materials warehouse" to Building 835. Historical buildings are currently being identified.

Response:

Comment noted. The text has been revised to include ducks and geese at the pond and Lake Danielson. In addition, Building 865 has been changed to Building 835.

Comment A-43:

13. Table 3-1: Make changes in accordance with changes mentioned above.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The table has been revised accordingly.

Comment A-44:

14. Table 3-2: Find out tank type, do not put unknown. If excavated, then they were probably USTs. In present status column, USTs are either active, removed, or closed in place - not "not applicable".

Response:

Comment noted. The table has been revised accordingly.

Section Four:**Comment A-45:**

1. Page 4-1, Section 4.1: Put sources in chronological order. 4th bullet: The RI was completed, but it did not fully identify or delineate the problem; therefore, the RI continues.

Response:

Comment noted. The sources are already in chronological order. The fourth bullet has been revised to indicate that the RI is ongoing.

Comment A-46:

2. Page 4-2, 2nd bullet: What about all the other USTs that were removed or closed in place since FY93. Only two USTs remain at DDMT. 1st para: Huntsville's proper name is U.S. Army Corps of Engineers Huntsville Support Center, CEHNC.

Response:

Comment noted. The text has been revised accordingly.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-47:**

3. Page 4-5, OUI Table, Site 86: Current disposition of site is CWM.

Response:

Comment noted. The table has been revised to reflect the current disposition of Site 86.

Comment A-48:

4. Page 4-15, NFA Table, Site 86: No longer NFA due to possibility of CWM.

Response:

Comment noted. Site 86 has been deleted from the NFA Table.

Comment A-49:

5. Page 4-15, Section 4.1.2.5, 2nd para: Correct Huntsville's name.

Response:

Comment noted. The text has been revised accordingly.

Comment A-50:

6. Page 4-16, Section 4.1.2, Phase 1&2: Correct Huntsville's name.

Response:

Comment noted. The text has been revised accordingly.

Comment A-51:

7. Page 4-16, Section 4.2, Table: What is Commercial facility use?

Response:

Comment noted. The table has been revised to clarify the correct facility usage.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-52:

8. Page 4-21, Section 4.3.2.3: Auto Zone no longer occupies this location. Suggest changing heading. 1st para, last sentence: Wording suggests hydraulic conveyance does occur between Fluvial and Memphis Sands Aquifers.

Response:

Comment noted. The heading for Section 4.3.2.3 has been changed to Adjacent Industrial Facilities. The text has been revised to clarify the relationship between the two aquifers, incorporating recent data.

Comment A-53:

9. Page 4-24, Section 4.4.3: Find testing results, all transformers were tested and labeled in 1993. Update this section.

Response:

Comment noted. The section has been revised to incorporate the 1993 data.

Comment A-54:

10. Page 4-26, Section 4.4.4: Radon survey has been completed. Test results were all below 4 pci.

Response:

Comment noted. The text has been revised to incorporate the radon survey.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-55:

11. page 4-28, Section 4.4.6: DDMT does not have a NRC license because we do not store Krypton-85.

Response:

Comment noted. The first paragraph of Section 4.4.6 has been deleted.

Comment A-56:

12. Page 4-29, Section 4.4.7, 3rd para: Delete last sentence.

Response:

Comment noted. The text has been revised accordingly.

Comment A-57:

13. Page 4-33, 1st para, 1st sentence: Delete common following "report".

Response:

Comment noted. The text has been revised accordingly.

Section Five:**General Comment****Comment A-58:**

Isn't this document supposed to identify environmental conditions that may be associated with parcels? If so, shouldn't parcel descriptions include all information concerning past spills, storage, etc.? Some EBS parcel descriptions do not go into details that are in SAR. For instance, some EBS parcel descriptions mention that "according to DDMT personnel, sampling is recommended for the surface soils around the buildings in this parcel." Why? What caused the need for sampling?

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The text has been revised to correspond with the SAR, clarifying the sampling requirement.

Comment A-59:

1. Page 5-9, spill list: Put in chronological order.

Response:

Comment noted. The text has been revised accordingly.

Comment A-60:

2. Page 5-40, Parcel 144(7): The bauxite piles are not covered. The fluorspar piles are covered.

Response:

Comment noted. The text has been revised accordingly.

Comment A-61:

3. Page 5-41, Parcel 145(7): See above.

Response:

Comment noted. The text has been revised accordingly.

Comment A-62:

4. Table 5-1a, Page 11 of 25, Parcel 72(7): "This building..." What building?

Response:

Comment noted. The text has been revised to include the building number.

APPENDIX A**COMMENT RESPONSE PACKAGE****A.2 RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT EBS REPORT****A.2.1 RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY REGION IV
COMMENTS ON THE DRAFT EBS REPORT**

ENTITY: U.S. Environmental Protection Agency, Region IV

INDIVIDUAL: Dann Spariosu

TITLE: Remedial Project Manager

DATE: July 18, 1996

General CommentComment A-63:

The BRAC Cleanup Team (BCT) has decided, for the time being, to use the parcel designations proposed by the Memphis Depot Redevelopment Agency (MDRA). The EBS should therefore reflect the 1-36 parcel designation and numbering system.

Response:

Comment noted. The BRAC parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting.

Specification Comments:Comment A-64:

1. Figure 1-3: The 1996 potentiometric surface map should be used

Response:

Comment noted. The figure has been revised accordingly.

DRAFT

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-65:**

2. P. 2-3, Section 2.1.2 and p. 2-12, Section 2.2.1, p. 5-: Woodward-Clyde did not perform a search of federal records pertaining to DDMT.

Response:

Comment noted. The text has been revised to reflect a partial search of federal records.

Comment A-66:

3. P. 4-17: The table should be expanded to reflect potential contamination in all of the Category 7 parcels.

Response:

Comment noted. The table has been expanded to reflect potential contamination in all of the Category 7 parcels.

Comment A-67:

4. P. 5-2, Sect. 5.1.2: Delete "... in amount exceeding their reportable quantity...". Also strike any other references to "exceeding reportable quantity" in the EBS (if any). CERFA does not establish any minimum quantities in defining hazardous waste storage. I am not sure about petroleum storage.

Response:

We do not concur. OSWER Directive 9345.0-09, EPA 540/F-94/32, PB 94-963249, April 19, 1994 allows for this inclusion.

Comment A-68:

5. Re: Army COE comment #2, page I, 1st para: EPA considers unexploded ordnance a CERCLA waste and a RCRA waste after disposal.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

We do not concur. However, it should be noted that the limited potential presence of UXO has been identified and documented in the EBS report. Prior to transfer or lease, a Finding of Suitability to Transfer or Lease (FOST or FOSL) will be conducted to determine whether, and how, to proceed.

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APPENDIX A**COMMENT RESPONSE PACKAGE****A.3 RESPONSES TO STATE OF TENNESSEE COMMENTS ON THE DRAFT EBS****A.3.1 RESPONSES TO TENNESSEE DEPARTMENT OF ENVIRONMENT AND
CONSERVATION ON THE DRAFT EBS REPORT**

ENTITY: Tennessee Department of Environment and Conservation

INDIVIDUAL: Terry R. Templeton

TITLE: Project Manager

DATE: July 18, 1996

General CommentsComments A-69:

One of the major purposes of this report is to identify, classify, and label all the parcels of the Defense Depot according to their environmental condition. To this end, extensive tables of data are employed with various characteristics of each parcel identified and with various identification schemes. The current parcel identification scheme is confusing. The Division suggests an identification scheme that employs a common numbering system. This system should have as its primary identifier the MDRA parcel number. The information that is currently found in the tables, including the information from which the parcel "label" is derived, should be maintained. But the primary, unique parcel identification number should be simplified. The Division's ideas on a modified identification scheme were discussed during the BCT meeting proposed for July 18, 1996.

Another crucial element of the EBS report is the accurate assessment of the environmental condition of all areas of the Depot facility. If there are areas where potential environmental problems exist that may have been overlooked during the EBS survey, or if an environmental problem in a parcel has been overstated, the Division seeks assurance that review methods will be able to identify and correct these problems. The Division believes that one of the primary ways this can occur is to rely on the intimate facility knowledge of DDMT personnel. The Division will assist this effort in any way possible. Correcting erroneous assessments of either

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APPENDIX A**COMMENT RESPONSE PACKAGE**

type offers an opportunity for cost-savings and increasing the level of protection of public health and the environment.

Response:

Comment noted. The parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting. In addition, the text has been revised in accordance with DDMT personnel recommendations.

Specific Comments**Comment A-70:**

List of Acronyms, page x:

Pentachlorophenol (PCP) is misspelled.

Response:

Comment noted. The text has been revised accordingly.

Comment A-71:

Section 1.5.2, page 1-8:

The Division is unclear why there is estimated data for 1988 instead of actual data from the 1990 census.

Response:

Comment noted. This section has been revised to include up-to-date census data.

Comment A-72

Section 1.5.5, page 1-11:

In the first sentence, how does an elevation range of 282 to 300 feet translate to 110 feet of relief in the DDMT area?

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Response:

Comment noted. The text has been revised accordingly.

Comment A-73:

Section 1.5.5, page 1-11:

The statement at the top of the page that very few earthquakes have occurred in the Memphis/Shelby County area is a little misleading. Historical records indicate quite a number of earthquakes that have been felt in the area, even if the epicenter of the earthquake was somewhere else. In addition, the seismicity of the area is well documented, even if the majority of the events are microearthquakes and not felt by people.

Response:

Comment noted. The text has been revised to include microearthquakes.

Comment A-74:

Section 1.5.6, page 1-11:

It seems reasonable, in the context of the fourth paragraph, to mention the thickness of the Memphis Sand. In the next paragraph, it would seem to be more appropriate to state that the Fort Pillow Sand "averages" 200 feet thick, rather than saying it is "reported to average"; either it does or it doesn't average 200 feet.

Also in the fourth paragraph there is a reference to the recharge area of the Memphis Sand being "several miles east of Memphis." Because the outcrop area of the Memphis Sand formation is well known, the distance should be stated in actual miles. The distance can be construed to be more than "several" miles, depending on the definition of "several."

Response:

Comment noted. The text has been revised accordingly.

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-75:**

Section 1.5.6, page 1-12:

The second word in the first line on this page should be artesian, not "artisan." In addition, the hydrogeologic units referred to at the end of this sentence should probably be defined.

Also, regarding Figure 1-3 referred to in this section, can the latest version of the "Potentiometric Surface Map of Fluvial Aquifer" be used instead of the November 1993 version?

Response:

Comment noted. The text has been revised accordingly. In addition, Figure 1-3 has been revised to include the latest data.

Comment A-76:

Section 2.1.2, page 2-5:

The second bullet on this page referring to DDMT being on the "State Superfund Promulgated Sites list" is partly incorrect. The list is more correctly referred to as the Tennessee list of Inactive Hazardous Substance Sites. In addition, DDMT has been removed from the Tennessee list.

Response:

Comment noted. The text has been revised to reflect the current status.

Comment A-77:

Section 2.1.2.2, page 2-7:

The "Violation Rule Number" is missing from the first entry in the table on this page.

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The table has been revised to clarify this discrepancy.

Comment A-78:

Section 2.1.3, page 2-8:

Should an index or list of photos used be provided to assist public access?

Response:

Comment noted. The dates of the aerial photographs reviewed have been listed.

Comment A-79:

Section 2.1.5, page 2-9:

The title of the table on this page is somewhat misstated. Perhaps it could be called "Summary of DDMT Personnel Interviews"?

Response:

Comment noted. The title of the table has been revised accordingly.

Comment A-80:

Section 3.4.5, page 3-10:

In the first paragraph of this section the Fort Pillow Sand Aquifer is incorrectly referred to as being 1,400 feet thick.

Response:

Comment noted. The text has been revised to reflect that the Fort Pillow Sand Aquifer is 200 feet thick.

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-81:**

Section 4.1.1.3, page 4-9:

Is 0.0022 mg/L referred to as a higher level of pesticides a correct number?

Response:

Comment noted. The text has been revised to indicate that 0.0022 mg/L is a slightly higher concentration of pesticides.

Comment A-82:

Section 4.5.3.1, page 4-32:

The last sentence on this page is a bit confusing. The last clause of this sentence could be construed that a second aquifer is involved. The deeper Memphis Sand aquifer is also the drinking water aquifer for the city of Memphis.

Response:

Comment noted. The text has been revised to clarify that only one aquifer is involved.

Comment A-83:

Section 4.5.3.1, page 4-33:

The first sentence on this page has an apparent common splice ("...design report, was prepared...").

Response:

Comment noted. The text has been revised accordingly.

Comment A-84:

Section 5.1, page 5-1 (reference to Figure 5-1):

There are several comments to make about the CERFA Maps. First, the distinction between boundary lines, while marginally discernible in the legend, is virtually impossible to make on the map itself. Second, it would be useful to have the grid

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APPENDIX A**COMMENT RESPONSE PACKAGE**

coordinate scales duplicated on the top and right sides of the map for ease in locating site or parcel coordinates. In addition the matter of parcel identification, labeling, and cross-referencing data parcel tables needs to be addressed.

Response:

Comment noted. The CERFA maps have been revised accordingly.

Comment A-85:

Section 5.1.7, page 5-11, BRAC Parcel Number and Label 3(7):

See the comment for page 1 of the SAR that refers to this Parcel.

Response:

Comment noted. The text for BRAC Parcel Number and Label 3(7) has been revised to correspond with the SAR.

Comment A-86:

Table 5-1b, page 1 of 12:

This is an example of a spot check of a table entry. There seems to be no BRAC Parcel No. and Label 1-1Q-A/L(P) at coordinates 32, 10 on Figure 5-1, the CERFA map.

Response:

Comment noted. BRAC qualified parcel labels are not shown on Figures 5-1 or 5-2. A sentence has been added to Section 5.1.8 for clarification.

APPENDIX A**COMMENT RESPONSE PACKAGE**

**A.4 RESPONSES TO U.S. ARMY MATERIEL COMMAND COMMENTS ON THE
DRAFT EBS REPORT**

The U.S. Army Materiel Command did not comment on the Draft EBS Report.

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APPENDIX A

COMMENT RESPONSE PACKAGE

A.5 RESPONSE TO U.S. ARMY ENVIRONMENTAL CENTER COMMENTS ON THE
DRAFT EBS REPORT

ENTITY: U.S. Army Environmental Center

INDIVIDUAL: Kenneth E. Wiggans

TITLE: Chief, Restoration and Oversight Branch

DATE: July 3, 1996

Comment A-87:

I. Section 4:

a. Section 4.3.2 Environmental Concerns From Adjacent or Surrounding Property. A list of the adjacent sites that could impact the installation should be included in this section. This can be done as a table providing site name, relative location, and contaminants of concern.

b. Section 4.4.2 Lead-Based Paint (LBP). The age of the housing units containing LBP should be included. The U.S. Housing and Urban Development (HUD) regulations require that in housing built prior to 1960, LBP must be abated prior to occupancy. This requirement does not apply to housing built between 1960 and 1978. The information on the water samples should be placed in a separate subsection on drinking water quality. However, this is not typically included in an EBS.

c. Section 4.4.5 Unexploded Ordnance. The discussion of the severity rating for the pistol range at Dunn Field should be expanded if possible. The Golf Course pistol range had a severity rating of negligible, yet, the Huntsville Division gave the range at Dunn Field a rating of catastrophic.

d. Section 4.4.7 Pesticides Usage. The 3rd paragraph on page 4-29 should be rewritten. The paragraph implies that DoD illegally dumped pesticides throughout the facility. Presumably the application of pesticides was in accordance with approved application requirements under FIFRA.

APPENDIX A**COMMENT RESPONSE PACKAGE****Response:**

- a. We do not concur. It is beyond the scope of the EBS to list all contaminants of concern for adjacent properties.
- b. Comment noted. The ages (dates of construction) of the structures have been added to the text. Additionally, the paragraph referencing water quality samples for lead has been deleted.
- c. Comment noted. The discussion of hazard severity has been expanded.
- d. We do not concur. The third paragraph states that "It has been conceded by the DDMT that pesticide contamination exists basewide and is a result of direct application, not release."

Comment A-88:**2. Section 5:**

- a. The text in this section is redundant. All of this information is provided in Table 5-1.
- b. A summary table identifying the total acreage by CERFA classification should be included.
- c. The parcels as they have been broken down may be too small for realistic reuse. Real estate considerations should also be included in determining the size of the parcels. For example, the golf course is broken down into 7 parcels, yet it is more likely that the entire course will be transferred. Also, Building 489 has 2 parcels, the building itself and the loading dock. This should be one parcel. The two parcels do have different CERFA classifications, however, the combined parcel would classify as the highest number, 7 (more information needed). Following any additional studies, the parcel could then be classified as 3 based on the spill at the loading dock.
- d. Section 5.1.7 Category 7 Parcels. In most cases the contaminants of concern and media (soil, groundwater) are identified. However, for parcels 2, 14, 23, 29, 84, & 88, no information is given. These need to be reviewed and the discussion expanded. For example, for Parcel 2, additional information is needed to address possible pesticide contamination in the soil around

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APPENDIX A**COMMENT RESPONSE PACKAGE**

the demolished structures. This also makes it easier to review the Sampling and Analysis Plan, and to update the EBS for any future real estate action.

e. Section 5.1.7 BRAC Parcel 147. This parcel is described as being the fluvial aquifer at Dunn Field. The aquifer is not a parcel subject to transfer. A better description would be the northwest corner of Dunn Field. This area contains approximately 20 parcels. It might be easier to identify Dunn Field as one parcel with several potential sources of contamination (sites). This would not affect the overall classification as it would still remain as a category 7.

f. A column should be added to Table 5-1 providing a description of the parcel (e.g., Building 129, Golf Course, etc.)

Response:

- a. Comment noted.
- b. Comment noted. An acreage summary table has been added to this section.
- c. Comment noted. The BRAC parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting.
- d. Comment noted. The discussion of these parcels has been expanded.
- e. Comment noted. The BRAC parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting.
- f. Comment noted. Table 5-1 has been revised to add the parcel description.

Comment A-89:

3. Appendices: Completed Interview Forms (Appendix B) and Visual Inspection Forms (Appendix C) need to be included in the Final EBS.

Response:

A supplement to the EBS report will be created with completed interview and visual inspection forms. A limited number of copies will be available for review in Building 144, Room 153.

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APPENDIX A**COMMENT RESPONSE PACKAGE****A.6 RESPONSES TO U.S. ARMY CORPS OF ENGINEERS COMMENTS ON THE DRAFT EBS REPORT****A.6.1 RESPONSES TO U.S. ARMY CORPS OF ENGINEERS, MOBILE DISTRICT COMMENTS ON THE DRAFT EBS REPORT**

ENTITY: U.S. Army Corps of Engineers, Mobile District

INDIVIDUAL: Ellis Pope

TITLE: Geographic Project Manager

DATE: July 18, 1996

Comment A-90:

1. General Comment: The BRAC parcel numbers should be revised to match the MDRA parcel numbers.

Response:

Comment noted. The BRAC parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting. The MDRA parcel number is the primary designator for the BRAC parcels.

Comment A-91:

2. Executive Summary, Page i, 1st para: Identify PCBs, radon, radionuclides, and unexploded ordnance as non-CERCLA substances along with asbestos and lead-based paint.

Response:

Comment noted. The text has been revised accordingly.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-92:**

3. Executive Summary, Page i, 2nd para: Suggest changing the last sentence to read "...Category 5, 6, or 7 are not suitable for transfer without further investigations."

Response:

Comment noted. The text has been revised to read, "... Category 5, 6, or 7 are not suitable for transfer without further investigation or remediation."

Comment A-93:

4. Executive Summary, Page i, 3rd para: This paragraph should make it clear that the 642 acres being evaluated represents the entire facility.

Response:

Comment noted. The text has been revised accordingly.

Comment A-94:

5. Executive Summary, Page ii, 3rd para: The first sentence needs to be revised to show the number of parcels identified.

Response:

Comment noted. The text has been revised to show the number of parcels.

Comment A-95:

6. List of Acronyms, Pages ix - xi:

CERFA stands for Community Environmental Response Facilitation Act.

EBS stands for Environmental Baseline Survey.

HTRW stands for Hazardous, Toxic, and Radiological Waste

Phentachlorophenol is misspelled.

APPENDIX A**COMMENT RESPONSE PACKAGE**

TDEC stands for Tennessee Department of Environment and Conservation. Make change globally.

VOC is listed twice.

Response:

Comment noted. The List of Acronyms has been revised accordingly.

Comment A-96:

7. Page 1-2, 1st para: Should pesticides be included in the list of substances not normally addressed under the IRP?

Response:

Comment noted. Pesticides have been removed from the list of substances not normally addressed under the IRP.

Comment A-97:

8. Page 1-2, 2nd para: The last sentence states that CERFA considers CERCLA contaminants and petroleum products. Doesn't it also consider non-CERCLA substances as stated in the first paragraph on this page?

Response:

CERCLA §120(h)(4) specifically refers to hazardous substances and petroleum products. We have removed "CERCLA" from the text to be consistent.

Comment A-98:

9. Page 1-2, Section 1.2, 2nd para: The latest version of the BCP Guidebook is 1995. This should also be in listed in the references in Section Six.

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Response:

A major impact of the 1995 *BCP Guidebook* on the EBS process is the exclusion of petroleum and petroleum derivatives from the definitions of Categories 2 through 7. Army guidance requires petroleum storage and release to be disclosed in the Finding of Suitability to Transfer (FOST). To facilitate future FOST preparation, the DA BRAC office, in February 1996, directed the BRAC 95 EBS process to proceed based on the 1993 *BCP Guidebook* guidance.

Comment A-99:

10. Page 1-3, Section 1.3: The definition of adjacent properties should be revised to remove the phrase "on or off the installation". Adjacent properties are not on the installation.

Response:

Comment noted. The text has been revised accordingly.

Comment A-100:

11. Page 1-4: Why has the definition of Category 1 been expanded to include the sentence beginning with "Additionally". This is not in the definition given in the BCP Guidebook..

Response:

OSWER Directive 9345.0-09, EPA 540/F-94/32, PB 94-963249, April 19, 1994 allows for this inclusion.

Comment A-101:

12. Page 1-5: The definition of reserve enclave should be removed or it should be stated that none of the installation will be retained as a reserve enclave unless that is the plan for Dunn Field.

Response:

Comment noted. A sentence has been added to Section 1.0 indicating that Dunn Field may be redesignated as a reserve enclave.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-102:

13. Page 1-10, Section 1.5.5, 1st para: The first sentence states that there is approximately 110 feet of relief. Is this for the entire surrounding area or for the depot only? If for the depot only, it is contradictory to the second sentence.

Response:

Comment noted. The text has been revised accordingly.

Comment A-103:

14. Page 2-5: The first bullet states that locations of the spills was not reported in the database. Do other depot records state where the spills occurred? If so, state that the information is contained in a later section.

Response:

Comment noted. The first bullet has been revised to indicate that DDMT records provided the spill locations and that this information is contained in Section 4.1.3 and on Table 4-1.

Comment A-104:

15. Page 2-8, Section 2.1.3: This section should state the year of each aerial photograph reviewed.

Response:

Comment noted. A table with the dates of the aerial photographs reviewed has been added to this section.

Comment A-105:

16. Page 2-13: Change footnote (5) to State Department of Environment and Conservation, UST Division, UST sites

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The footnote has been revised accordingly.

Comment A-106:

17. Page 3-2, Section 3.3.1: Why is Building S271 listed as Golf Course Club House? Is this a former use of this building?

Response:

Comment noted. Building S271 has been listed as the Former Golf Course Club House.

Comment A-107:**18. Table 3-1:**

Instead of listing the number of floors as "Unknown" for facilities such as flagpoles, antenna tower, tennis courts, swimming pools, etc., it would be more appropriate to say "Not Applicable". Also, there should not be any case where the number of floors of any of the structures is unknown. There has been no discussion at this point of the "MDRA Priority" or "Operable Unit" descriptions and the use of these in Table 3-1 may only serve to confuse. Is there a compelling reason to leave these categories in this table?

Why is Building S271 referred to as both USACE administrative building and Golf Course Club House?

The current storage/use of Facility No. S1090 and S1091 is not "Quonset Hut". That is the type of structure. From the description, its use should be paint storage.

Response:

Comment noted. Table 3-1 has been revised accordingly.

APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-108:**

19. Table 3-2: The date of removal of the third tank listed is incorrect. Should this be July 1995?

Response:

Comment noted. Table 3-2 has been revised to indicate the date of removal of the third tank as July 1995.

Comment A-109:

20. Figure 3-1: There is no previous discussion of operable units (OU). This figure would be better located in Section Four where the OU discussion is located.

Response:

Comment noted. The figure has been moved to Section Four.

Comment A-110:

21. Page 4-6, 1st para: The units for PAH contaminated soil should be mg/kg, not mg/L. Also, the units for metals in groundwater should be mg/L, not mg/kg.

Response:

Comment noted. The text has been revised accordingly.

Comment A-111:

22. Page 4-11, 1st para: It should be stated that the levels of pesticides, PAHs, and VOCs concentrations listed in the second sentence were in soil samples.

Response:

Comment noted. The text has been revised accordingly.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-112:

23. Page 4-15: Site No. 40 in the table states NFA because of low potential for release at the Safety Kleen Units. Is this also based on past practices at the site before Safety Kleen Units were installed? Has sampling occurred at these sites?

Response:

Comment noted. The table has been revised as follows: The language "low potential for release" has been deleted and "NFA" has been revised to read "proposed NFA Sites."

Comment A-113:

24. Page 4-16, Section 4.1.2.5: Is there a proposed schedule for conducting the three phases of CWM activities listed?

Response:

Comment noted. The schedule for the CWM activities is beyond the scope of this EBS report. It will be included in the BRAC Cleanup Plan if available.

Comment A-114:

25. Page 4-20, Section 4.3.2, 1st para: Change "...from adjacent of surrounding property..." to "...from adjacent or surrounding property..." in the first sentence.

Response:

Comment noted. The text has been revised accordingly.

Comment A-115:

26. Page 4-20, Section 4.3.2, last para: Why is the "Auto Zone" site listed as a general category. It seems this would be a specific site, rather than a general category.

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The "Auto Zone" site reference has been changed to "adjacent industrial facilities" in Sections 4.3.2 and 4.3.2.3.

Comment A-116:

27. Page 4-21: It should be stated that specific information obtained in the database searches is contained in Appendix A.

Response:

Comment noted. The text in Section 4.3.2 has been revised accordingly.

Comment A-117:

28. Page 4-35, Section 4.5.3.2: Early removal sites are not summarized in Section 4.1.2.2 as stated in the last sentence.

Response:

Comment noted. The last sentence in this section has been deleted. In addition, the references to "ER" sites has been changed to "proposed ER" sites.

Comment A-118:

29. Table 4-1, Page 3 of 3: Should the spilled material at Building 835 be Hydrofluoric acid or Hydrochloric acid?

Response:

The spilled material at Building 835 is hydrofluoric acid. The spelling error has been corrected.

Comment A-119:

30. Table 4-2, page 2 of 4: Building 717 is also a public toilet in addition to ice house.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The table has been revised accordingly.

Comment A-120:

31. Table 4-2, Page 3 of 4: Building T273 is not included on either the list of building surveyed or not surveyed. It should be listed as possible asbestos.

Response:

Comment noted. The table has been revised to include Building T273.

Comment A-121:

32. Figure 4-1: Further is misspelled in the legend for No Further Action Site.

Response:

Comment noted. The figure has been revised accordingly.

Comment A-122:

33. Figure 4-3: Why is the symbol for existing monitoring wells different for this OU from the other OUs? There are many of these symbols on the map with no well number associated with them.

Response:

Comment noted. This figure has been revised to be consistent with other figures in this section.

Comment A-123:

34. Figure 4-4: Why are the site locations not shown on OU-4? The table on pages 4-10 and 4-11 lists 26 locations.

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. This figure has been revised to be consistent with the table and the other figures in this section.

Comment A-124:

35. Section 5, General Comment: The results of the visual inspections should be included with each parcel discussion. This should include a brief description of the current use (what was in the building during the inspection) and the historical use of each building. Also, the building number associated with each of the parcels should be stated in that parcel description. The BRAC parcel numbers should be changed to match the MDRA parcel numbers.

Response:

Comment noted. Visual inspection results are covered in Tables 5-1a or 5-1b, as are current and (where available) former uses of each building. Table 5-1a has been revised to include building numbers. The BRAC parcel numbering system has been revised in accordance with decisions made at the July 18, 1996 BCT meeting.

Comment A-125:

36. Page 5-5, BRAC Parcel No. 111: If this area was historically used for drum storage within an earthen berm, should it not be a Category 7 parcel rather than a Category 2? Although there has been no documented release, the historical use indicates a potential that a release could have occurred. Comment noted. This parcel is for Building 925 only. The area surrounding the building is Category 7. Sampling beneath the Building 15 unwarranted from the perspective of risk to human health.

Response:

Comment noted. This parcel is for Building 925 only. The area surrounding the building is Category 7. Sampling beneath the building is unwarranted from the perspective of risk to human health.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-126:

37. Page 5-6, BRAC Parcel No. 128: If no studies have been done to substantiate that no release has occurred, should this site not be a Category 7 parcel based on its usage?

Response:

Comment noted. The results of the visual inspection give no indication that a release has occurred. Therefore, the building is a Category 2.

Comment A-127:

38. Page 5-6, Section 5.1.3: Change "requires" to "require" in the second line.

Response:

Comment noted. The text has been revised accordingly.

Comment A-128:

39. Page 5-7, BRAC Parcel No. 13: PS is used twice in the label. Should the second usage be PR?

Response:

Comment noted. The label has been revised to read "... PS/PR/HS/HR."

Comment A-129:

40. Page 5-9, BRAC Parcel No. 112: Have studies been done to document that the site was fully remediated and that no further action is required?

Response:

The parcel is associated with proposed NFA Site 53. The proposed NFA sites are being reevaluated. The category designation may change as a result of the reevaluation.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-130:**

41. Page 5-10, Category Parcels: All of the Category 7 parcels should have the parenthetical designations (HR, HS, PR, PS).

Response:

Comment noted. The text has been revised accordingly.

Comment A-131:

42. Page 5-15, BRAC Parcel No. 3: Why should surface soils be sampled around these buildings? A lead-based paint survey has been conducted that included sampling of surface soils for lead around these buildings. Would there be any reason to sample for anything other than lead?

Response:

Additional sampling should be conducted for pesticides. The text in Section 5.1.7 has been revised to state that "... the surface soil surrounding buildings at the installation has the potential for pesticide contamination.

Comment A-132:

43. Page 5-22, BRAC Parcel No. 51: The text states that this parcel contains railroad tracks, but no tracks are shown on Figure 5-1 for this location. Also, what buildings are in this parcel? Does the reference to sampling surface soils surrounding the buildings refer to Building 629?

Response:

Figure 5-1 does show railroad tracks along the southern border of Parcel No. 51. This parcel contains Building 629. The surface soil sampling does refer to Building 629. The text has been revised to clarify this issue.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-133:**

44. Page 5-27, BRAC Parcel No. 79: A 1992 reference is given for a 1995 spill in Building 670. Please make correction.

Response:

Comment noted. The text has been revised accordingly.

Comment A-134:

45. Page 5-30, BRAC Parcel No. 94: State what open storage area X01 was used for.

Response:

Comment noted. The text has been revised accordingly.

Comment A-135:

46. Page 5-31, BRAC Parcel No. 98: Why are the parenthetical references listed with the sentence about the EBS visual site inspection? Should they not be following the information concerning the spills?

Response:

Comment noted. The references have been moved to follow the information they represent.

Comment A-136:

47. Table 5-1a, BRAC Parcel No. 15: The description under the basis column conflicts with the text on Page 5-13. The table states that the visual inspection revealed that POLs, antifreeze, and fertilizer are currently stored in the building, whereas Page 5-13 states that the building had been used to store POLs, antifreeze, and occasionally fertilizer. If they are currently stored together in the building, does this present a safety hazard?

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The fertilizer has been removed from Building 254. Table 5-1a has been revised accordingly.

APPENDIX A**COMMENT RESPONSE PACKAGE**

A.7 RESPONSES TO OTHER COMMENTS ON THE DRAFT EBS REPORT**A.7.1 RESPONSES TO MEMPHIS DEPOT REDEVELOPMENT AGENCY COMMENTS ON THE DRAFT EBS REPORT**

ENTITY: Memphis Depot Redevelopment Agency

INDIVIDUAL: Cynthia A. Buchanan

TITLE: Executive Director

DATE: July 18, 1996

Comment A-137:

EXECUTIVE SUMMARY

Comment No. 1 Executive Summary page i

Revise the second paragraph to reflect that "Areas that are currently designated as Category 5, 6, or 7 are not suitable for transfer, but may be leased."

Response:

Comment noted. The text has been revised accordingly.

Comment A-138:

Comment No. 2 Executive Summary page ii

Please include the number of parcels (instead of XX) in "The survey and parcelization of the DDMT identified XX BRAC parcels based on the environmental conditions of the property."

Response:

Comment noted. The text has been revised accordingly.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-139:

Comment No. 3 Executive Summary page ii

Clarify what a "Line Item" consists of when discussed in the items shipped. If this is to be a public document, it is unclear what level of activity is represented by this term.

Response:

Comment noted. The text has been revised accordingly.

Comment A-140:

Comment No. 4 Executive Summary pages x and xi

In the List of Acronyms, please correct the following:

MDRA Memphis Depot Redevelopment Agency

OPD Office of Planning and Development, Memphis and Shelby County

TDEC Tennessee Department of Environment and Conservation

Response:

Comment noted. The text has been revised accordingly.

SECTION ONE**Comment A-141:**

Comment No. 5 Section 1.1 page 1-2

In the last paragraph of Section 1.1, please include a brief description of the requirements of CERCLA 120(h).

Response:

CERCLA §120(h) is quite lengthy and to include a brief description may be considered inadequate by others. However, a review of CERCLA §120(h) would illustrate the basis for the type of survey and activities conducted and the format for the EBS report. This has been included in revised text.

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APPENDIX A

COMMENT RESPONSE PACKAGE

Comment A-142:

Comment No. 6 Section 1.2 page 1-2

Please include a more detailed discussion of the seven standard environmental condition of property types, including how the presence of asbestos, radon, and/or lead paint, etc. affects the classifications?

Response:

Section 1.2, Purpose and Scope of Environmental Baseline Survey, and Section 1.3, Definition of Terms, adequately detail the seven standard environmental condition of property area types and the process by which non-CERCLA contamination substances are delineated. The affects of the presence of these substances on the BRAC clean-up process will be discussed in more detail in the BRAC Cleanup Plan (BCP).

Comment A-143:

Comment No. 7 Section 1.3 page 1-3

The definitions of Hazardous Substance and Petroleum should correspond to those in ASTM E1527 to help meet the requirements of a Phase I Assessment. Also include a definition of Hazardous Waste as the term is mentioned in Section 3.4.1 of the report.

Response:

The definition used for hazardous substances was developed over two previous rounds of base realignment and closure (1991 and 1993) by the Army, EPA, various states, and other regulatory agencies. The definition used for petroleum is cited in CERCLA §120(h)(4). Section 3.4.1, Hazardous Materials/Waste Management documents the practices used at the installation as determined from records and interviews. Substances considered hazardous wastes were determined by the installation in conjunction with their regulatory community; the determination was not made during the EBS.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-144:**

Comment No. 8 Section 1.3 page 1-3

In the Definition of Terms, "MDRA" should be identified as the Memphis Depot Redevelopment Agency.

Response:

Comment noted. The text has been revised accordingly.

Comment A-145:

Comment No. 9 Section 1.3 page 1-4

The definition of Category 3 references "concentrations that do not require removal or remedial action.", and the definition of Category 4 references "all removal or remedial actions to protect human health and the environment have been taken." What are the bases (e.g., concentrations below a certain action level or standard, cleanup approved by regulatory agencies, etc.) of this determinations? If published cleanup standards or action levels are used, please include copies.

Response:

The EBS report documents the environmental condition of the property based on records review and interviews. Usually, the determination that a removal or remedial action was not warranted or that a removal or remedial action was complete was documented in a report prepared as part of the installation's environmental program. Each installation has a regulatory board that reviews and approves conclusions made as part of the environmental program. The document in which this information was presented is referenced in the EBS report. If, however, a determination was made during the preparation of the EBS, the basis was documented in the EBS report. For example, if the concentration of TCE in groundwater was below the MCL, this fact would be stated in the EBS and the area would be designated as a Category 3.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-146:**

Comment No. 10 Section 1.4 page 1-6

Where records indicate remediation approval by a regulatory agency, please provide copies of closure documentation and mention status in the text.

Response:

Reasonably obtainable records associated with USTs have been documented in the EBS report. If closure was approved by the regulatory community for removed USTs, this information is included in the EBS report. Documentation is available in the Environmental Management Office.

Comment A-147:

Comment No. 11 Section 1.4 page 1-6

The assumption that no further action is warranted for areas where the regulatory agency has approved the completed work is questionable. Each area must stand on its own merits. Actions taken ten or fifteen years ago may not be adequate today. This statement was in terms of a tank, but the wood treating area is of greater concern.

Response:

If a regulatory agency is concerned that an area of the property poses a threat to human health or the environment because a remedial action performed in the past is no longer considered adequate, there are appropriate channels by which the agency can voice their concern. Agreement may be reached that additional investigation is warranted. However, it is unreasonable to expect that all past approved actions be reevaluated.

Comment A-148:

Comment No. 12 Section 1.5.1 Figure 1-1

Figure 1-1, Location of Defense Depot, should be produced on a USGS Quadrangle Map for better identification of the physical setting of the DDMT, showing also the CBD, the Memphis International Airport, and Memphis City Limits.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. Figure 1-1 has been revised accordingly.

Comment A-149:

Comment No. 13 Section 1.5.2 page 1-8

In the third paragraph, change the reference for zoning controls to "In Memphis, zoning controls and subdivision requirements are under the jurisdiction of the Memphis and Shelby County Office of Planning and Development." Population data in table is actually for the City of Memphis and not the MSA as identified.

Response:

Comment noted. The text has been revised accordingly.

Comment A-150:

Comment No. 14 Section 1.5.2 page 1-8

The high percentage of children in the vicinity (25% under the age of 15) makes evaluation of any offsite aspects more critical as these Shelby County citizens are at the greatest risk from environmental factors. Recognition of the increased vulnerability of this age group should be included.

Response:

Comment noted.

Comment A-151:

Comment No. 15 Section 1.5.3 page 1-9

While a lot of information is provided, the twenty-four hour, twenty-five year maximum rain event amount should also be given so the capacity of any open containment area is adequately measured to meet contents release during heavy rain.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The text has been revised accordingly.

Comment A-152:

Comment No. 16 Section 1.5.4 page 1-9

Do the individual visual inspection survey sheets have sketch plans showing surface drainage to help in identifying sampling locations?

Response:

The individual visual inspection survey sheets do not have sketch plans showing surface drainage. The sampling locations are to be identified by the U. S. Army Engineering and Support Center, Huntsville as part of the Sampling and Analysis Plan.

Comment A-153:

Comment No. 17 Section 1.5.5 page 1-10

Please clarify how there can be a 110 foot range in elevation on a site that shows elevations of between 282 and 300 feet above sea level.

Response:

Comment noted. The text has been revised accordingly.

Comment A-154:

Comment No. 18 Section 1.5.6 page 1-12

In the discussion of groundwater there is mention of a potential "hydraulic interconnect" between the shallow and deep aquifer. However, the initial information already developed for Dunn Field shows that the interconnection does not exist. This is a critical element for a number of decisions affecting the site and the public's perception, and this point must be clarified.

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APPENDIX A**COMMENT RESPONSE PACKAGE**Response:

Comment noted. Section 1.5.6 has been revised to incorporate data from the groundwater sampling conducted in the spring of 1996.

SECTION TWOComment A-155:

Comment No. 19 Section 2.1.1 page 2-1

The EBS document ID number should be reflected in the list of documents in Section 6, References.

Response:

Comment noted. The text has been revised accordingly.

Comment A-156:

Comment No. 20 Section 2.1.2 page 2-5

Have the unknown spill locations been further investigated? Can interviews with past and present employees supplement this lack of data?

Response:

The unknown spill locations have been identified through the EBS review of DDMT records and are identified in Section 4.1.3 and on Table 4-1. Text has been added to Section 2.1.2 to refer the reader to Section 4.1.3 and Table 4-1 for details.

Comment A-157:

Comment No. 21 Section 2.1.2.1 page 2-5

If possible, please include information on all expired, withdrawn, or unrenewed permits for past wastewater discharges, boilers, etc. that may have been potential sources of contamination at the facility during their operation.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Response:**

Comment noted. In the past, boiler discharges were regulated under the NPDES permit listed in Section 2.1.2.1.

Comment A-158:

Comment No. 22 Section 2.1.2.1 page 2-5

The permits for air pollution sources have all expired but, in order to prevent confusion, it should be noted that complete applications for their renewal have been submitted in a timely fashion. Under our local air pollution regulations, this submission serves to extend the validity of the old permits until new ones are either granted or denied by the Memphis and Shelby County Health Department.

Response:

Comment noted. Text has been added to this section to explain that renewals have been submitted and that the validity of the old permits has been extended by this submission.

Comment A-159:

Comment No. 23 Section 2.1.2.2 page 2-6

If possible, please provide the location (Building No., etc.) where the listed NOV's occurred.

Response:

Comment noted. The text has been revised accordingly.

Comment A-160:

Comment No. 24 Section 2.1.3 page 2-8

Copies of all aerial photographs used to support the findings of the EBS should be included in the report. Have sources of aerial photography such as the US Army Corps

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COMMENT RESPONSE PACKAGE

of Engineers, the Soil Conservation Service, and local aerial photography firms been contacted?

Response:

Aerial photographs do not reproduce well and their inclusion is not warranted. A table has been added to Section 2.1.3 that lists the photographs that were reviewed during the preparation of the EBS. Sufficient review was performed to adequately categorize the BRAC property.

Comment A-161:

Comment No. 25 Section 2.1.3 page 2-8

Copies of all existing property maps used to support the findings of the EBS should be included in the report.

Response:

Comment noted. Existing property maps that were used to support the findings of the EBS are listed on the table in Section 2.1.1 and are available for reference.

Comment A-162:

Comment No. 26 Section 2.1.5 page 2-9

The list of interviewees does not include Bill Lovejoy, whom we understand was responsible for environmental work for the Depot and may be a source of useful information.

Response:

Comment noted. An effort was made to contact Bill Lovejoy. The list of interviewees provides a representative sample of installation personnel.

Comment A-163:

Comment No. 27 Section 2.1.5 page 2-10

Why were no former base commanders interviewed as a part of this process?

APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

The base commanders receive their information from staff. Therefore, staff members were interviewed as part of the EBS process.

Comment A-164:

Comment No. 28 Section 2.1.5 page 2-10 and Appendix B

If possible, please include a brief summary of the more significant findings of the interview process. Copies of all completed interview forms used to support the findings of the EBS should be included in the report.

Response:

See the response to Comment A-89.

Comment A-165:

Comment No. 29 Section 2.1.6 page 2-11 and Appendix C

If possible, please include a brief summary of the more significant findings of the visual inspections. Copies of all completed visual inspection forms used to support the findings of the EBS should be included in the report.

Response:

See the response to Comment A-89.

Comment A-166:

Comment No. 30 Section 2.1.7 page 2-12

A title search back to 1900 would be more useful, while not being a significant additional burden.

Response:

We do not concur. The title search conducted was from 1941 to the present. It is unlikely that an additional title search would provide new information (information that was not revealed

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APPENDIX A

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through the records search or the interviews conducted) that would alter the determination of the environmental condition of the property.

Comment A-167:

Comment No. 31 Section 2.2 page 2-12

Needs additional detail on adjacent properties to support the conclusion - specific uses, names, locations, history, maps, etc. No information from any visual survey was presented, although it was mentioned. There are some additional environmental concerns in the vicinity of the DDMT (of which the TDEC is aware) which the database search may not have revealed, and which are not addressed in any specifics. The conclusion on page 2-13 is not justified based on the documentation provided.

Response:

Comment noted. The conclusion in Section 2.2.1 has been revised to state that "Potential off-site sources of contamination are still being evaluated."

Comment A-168:

Comment No. 32 Section 2.2 page 2-12

(This item deleted.)

Response:

Deletion of Comment No. 32 noted.

SECTION THREE**Comment A-169:**

Comment No. 33 Section 3.3 page 3.2

Please correct the reference to Memphis Depot Redevelopment Agency.

Response:

Comment noted. The text has been revised accordingly.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-170:

Comment No. 34 Section 3.4.1 page 3-7

Please provide additional information regarding the historic chemical storage, use and waste disposal practices at the facility. Also provide a discussion or evaluation of past offsite disposal practices for waste such as used oil (disposal locations, materials, and quantities) and PRP designations associated with any part of the activity.

Response:

Comment noted. The text has been revised to include available information.

Comment A-171:

Comment No. 35 Section 3.4.1 page 3-7

If the former pistol range is now part of the ninth hole of the golf course, there is a need to precisely delineate the boundaries of the former activity.

Response:

Comment noted. The delineation of the boundaries of the former pistol range will be addressed during the sampling and analysis phase of work.

Comment A-172:

Comment No. 36 Section 3.4.1 page 3-8

On page 3-8 Building 629 is identified as being used for the storage of chemical stock, but on page 7 of 15 of Table 3.1 Building 629 is identified as being used for the receiving and storage of clothing and general items. Please clarify.

Response:

Comment noted. The text has been revised to indicate that Building 629 was previously used for the storage of chemical stock. Table 3-1 is correct.

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COMMENT RESPONSE PACKAGE

Comment A-173:

Comment No. 37, Section 3.4.1 page 3-8

Why is the discussion of Hazardous Materials management at the DDMT limited to only a few of the many facilities that are listed in Table 3-1 as storage/use of hazardous materials?

Response:

The discussion of hazardous materials management is based on the information obtained from the EBS records review.

Comment A-174:

Comment No. 38 Section 3.4.1 page 3-8

Was Freon 113 or other dense non-aqueous phase liquids ever stored and used onsite? if so, is there any documentation or has consideration been given to the potential for DNAPL contamination of groundwater?

Response:

Consideration has been given to DNAPL contamination of groundwater as part of the ongoing groundwater investigation at the DDMT.

Comment A-175:

Comment No. 39 Section 3.4.1 page 3-8

In the first paragraph, "are received" suggests current practice. Is that accurate? In the third paragraph, Building 319 is referred to as "flammable materials storage area" which we understand is now in Building 925. Building 835 appears to be out of date. In addition, Area X-25 appears to be missing from Table 3-1.

Response:

The first paragraph on page 3-8 is accurate. The materials listed are currently being received at the DDMT. The text for Buildings 319 and 835 has been revised to reflect current conditions. Area X-25 will not be added to Table 3-1 since Building 925 currently occupies this area.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-176:

Comment No. 40 Section 3.4.1.2 page 3-9

On page 3-9 Building 1086 is described as being used for the storage of hazardous waste or hazardous materials, but on page 12 of 15 of Table 3-1, Building 1086 is identified as a Care and Preservation Shop/Paint Booth/Load and Unload Dock. Please clarify.

Response:

Comment noted. The text for Building 1086 has been revised to reflect current conditions.

Comment A-177:

Comment No. 41 Section 3.4.2 page 3-9

Please clarify whether the facility is an offsite or onsite TSDF under RCRA (i.e., did the DDMT receive hazardous waste from off site sources?).

Response:

The installation did not receive hazardous waste from off-site sources. The text in Section 3.4.2 has been revised to clarify this issue.

Comment A-178:

Comment No. 42 Section 3.4.2 page 3-9

While it is probable that it does not pose a grave threat, the discussion of the non-hazardous landfill operated on the site from 1940 - 1948, seems to too easily waltz over the likelihood that some hazardous materials were involved.

Response:

Comment noted. Section 3.4.2 is a subsection of the presentation of the facility support activities. A more thorough discussion of the potential contamination at Dunn Field is presented in Section Four.

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Comment A-179:

Comment No. 43 Section 3.4.3 page 3-10 and Table 3-2

Some of the information provided in Table 3-2 is incomplete or inconsistent. Following are several examples:

- Tank Type for the first tank listed in Table 3-2 is "Unknown" while the compliance action recommended closure by excavation or filling in place, which would indicate that the tanks was a UST.
- The location of the fourth tank listed in Table 3-2 is shown as the north side of Building 209, but the MDRA parcel is listed as 8. Should this be MDRA Parcel 14? The Status of this tank is indicated as "Unknown". Is there a plan to determine the status of the tank?
- The Status of the next to the last tank in Table 3-2 (Building 1085, east side) is shown as "not found". Is there a plan to determine the status of the tank?
- State approval should be provided for all tanks or samples should be collected to verify clean closure? Is there sufficient evidence to recommend further investigation of any removed or replaced tanks (e.g., tanks at Building 257)?
- If possible, please provide a better indication of all tank locations.

Response:

Comment noted. Table 3-2 has been revised.

Comment A-180:

Comment No. 44 Section 3.4.3 page 3-10 and Table 3-2

The information provided regarding the status of the closure of the UST's is inadequate. At a minimum, copies of all UST Notifications, Removal/Remedial Action records, and regulatory agency approvals used to support the findings of the EBS should be included in the report.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Response:**

See the response to Comment A-146.

Comment A-181:

Comment No. 45 Section 3.4.5 page 3-10

With the closure of the activity, has the potential for the creation or existence of any dead-end water supply pipes been evaluated regarding the need for over-chlorination during closure/nonuse of the facility? Has the existence of any lead-containing water supply pipes been evaluated? Has the condition of the water supply tank(s) been evaluated for reuse?

Response:

Comment noted. These are valid questions but are beyond the scope of the EBS.

Comment A-182:

Comment No. 46 Section 3.4.6 page 3-11

Has there been any sampling of the stormwater discharges for metals? Is a Stormwater Pollution Prevention Plan (SWPPP) available for review?

Response:

Dunn Field stormwater discharge is sampled for aluminum and magnesium. The text in Section 3.4.6 has been revised to include these sampling requirements. A Stormwater Pollution Prevention Plan is available for review.

Comment A-183:

Comment No. 47 Section 3.4.7 page 3-11

Sewage treatment is mentioned in this section and the principle failing of the report is its failure to locate, quantify and evaluate the sanitary and storm drain systems at the site. Is it possible to locate all major surface and sanitary drain access points near

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APPENDIX A**COMMENT RESPONSE PACKAGE**

hazardous materials operations, and any water quality monitoring done by the base or the city under any discharge agreement.

Response:

Comment noted. Information regarding the sanitary and storm drain systems is available from installation personnel. Locating all major surface and sanitary drain access points is beyond the scope of the EBS.

Comment A-184:

Comment No. 48 Section 3.4.7 page 3-11

Were the sanitary and stormwater sewer system plans reviewed by video camera survey, sampled, or otherwise evaluated regarding the potential impact on the classification of environmental condition of parcels adjacent to a above these systems?

Response:

Comment noted. A sanitary and stormwater sewer system survey was conducted by the Pickering Firm, Inc. Section 3.4.7 has been revised to include information from this survey.

Comment A-185:

Comment No. 49 Section 3.4.8 page 3-12

Electrical power was upgraded in the early 1990s, but the upgrade was not mentioned in this section.

Response:

Comment noted. The text has been revised to include the electrical upgrade.

Comment A-186:

Comment No. 50 Section 3.4.9 page 3-12

Does the lack of formal firefighting pits indicate that other informal locations may exist? The wording regarding this issue is not clear.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. The word "formal" has been deleted from this sentence to clarify the issue.

Comment A-187:

Comment No. 51 Section 3.4.10 page 3-12

Should "clinic" be mentioned under "Medical Activities"?

Response:

Section 3.4.10 has been revised to include the clinic.

Comment A-188:

Comment No. 52 Table 3-1

Although the information is readily available from the DDMT, some of the information provided in Table 3-1 is incomplete such as the number of floors and size being listed as "Unknown". In addition, if a building has been demolished, then maybe it would be better to identify it as such, instead of indicating as "Unknown". Other questions regarding the information provided in Table 3-1 are as follows:

- Were there no photo labs at the base or evidence of discharges to sanitary or storm sewer?
- What was the use of Building 333 before it was demolished and replaced by Building 717? (see page 8 of 15)
- The area north of Building 835 was used to contain spills, but berm was leveled in 1994. What happened to soil from berm? Was there any sampling associated with this activity. There does not appear to be any consideration of this use in Section Four or Section Five of the report. Please clarify.

APPENDIX A**COMMENT RESPONSE PACKAGE**

- Please clarify how drums were stored on (in) an earth berm at Building 925, and what happened to the soil from berm removal, and was any sampling done? What is the basis of the NFA recommendation?
- Please clarify the indication that Building S995 has no current use.

All information provided in Table 3-1 should be checked for consistency and completeness.

Response:

Comment noted. The bullet items has been investigated and Table 3-1 has been revised accordingly.

Comment A-189:

Comment No. 53 Figure 3-1

Since Figure 3-1 primarily indicates the locations and limits of the "Operable Units", it would seem to be more relevant to Section Four.

Response:

Comment noted. The figure has been moved to Section Four.

SECTION FOUR**Comment A-190:**

Comment No. 54 Section 4 - page 4-5

Site No. 64 does not appear to be shown on Figure 4-1.

Response:

Comment noted. Figure 4-1 has been revised to include Site No. 64.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Comment A-191:

Comment No. 55 Section 4 page 4-6

RI/FS Site No. 27 is in MDRA Parcel No. 25 rather than No. 24.

Response:

Comment noted. The text has been revised accordingly.

Comment A-192:

Comment No. 56 Section 4 page 4-7

RI/FS Site No. 47 is in MDRA Parcel No. 23 rather than No. 21.

Response:

Comment noted. The text has been revised accordingly.

Comment A-193:

Comment No. 57 Section 4.1 page 4-7

If possible, please provide a list of SWMUs and their location in relation to building numbers. Cross reference building numbers to RI/FS numbers. The OU summary tables are not consistent with the uses described in Table 3-1.

Response:

Comment noted. A list of SWMUs will not be provided. The OU summary tables have been checked for consistency with Table 3-1.

Comment A-194:

Comment No. 58 Section 4.1.1.4 page 4-11

Discussions of known contaminant levels without a corresponding discussion of area background levels for these items may mislead one as to the significance of these measurements.

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APPENDIX A**COMMENT RESPONSE PACKAGE**

Response:

Comment noted. This type of Risk Assessment analysis is beyond the scope of the EBS report.

Comment A-195:

Comment No. 59 Section 4.1.2 page 4-3 through 4-11

A much more detailed discussion of the sampling results available in each OU is necessary to clarify and define the potential areas of concern. For the purposes of subleasing, the results need to be related to specific buildings or open storage areas, if possible. A summary of the sampling results for each OU with an accompanying map would be much more useful than the generic descriptions provided.

Response:

Comment noted. This detailed analysis is beyond the scope of the EBS.

Comment A-196:

Comment No. 60 Section 4.1.1.2 page 4-6

RI/FS Site No. 30, Paint Spray Booth - Does the BEC concur that this site is a NFA site?

Response:

Comment noted. All references to NFA sites have been revised to read "proposed NFA sites."

Comment A-197:

Comment No. 61 Section 4.1.1.2 page 4-6 and Figure 4-2

RI/FS Site Number 71 is shown on Figure 4-2 but is not included in the table in Section 4.1.1.2.

Response:

Comment noted. RI/FS Site Number 71 has been added to the table in Section 4.1.1.2.

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APPENDIX A

COMMENT RESPONSE PACKAGE

Comment A-198:

Comment No. 62 Section 4.1.2.3 page 4-12

Screening Site Nos. 51 and 52 in OU-3 and Site No. 36 in OU-4 are not on the list of screening sites, but are identified as screening sites on the OU summary tables and in the Figures. Please clarify.

Response:

Comment noted. The tables and figures in Section Four have been revised to reflect consistent information.

Comment A-199:

Comment No. 63 Section 4.1.2.4 page 4-14

Have the sanitary and storm sewers been considered as potential sources of contamination that may affect the environmental condition of the property?

Response:

See the response to Comment A-184.

Comment A-200:

Comment No. 64 Section 4.1.2.5 page 4-15

The first sentence of this section suggests that disposal of chemical warfare materials was standard procedure. If this is not the intent, the statement should be more specific.

Response:

Comment noted. The first sentence of this section has been deleted to avoid misinterpretation.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-201:**

Comment No. 65 Section 4.1.2.5 page 4-15

How can 86 be a potential site of chemical warfare test kits and also be on the NFA List? There is also discussion of CWM disposed of at unknown locations as if this were a fact. Is this a fact or a conjecture?

Response:

Comment noted. Site 86 has been removed from the NFA site list. The concept of CWM disposed of at unknown locations was introduced in the Operable Unit-1 - *Field Sampling Plan* (CH2M Hill 1995c).

Comment A-202:

Comment No. 66 Section 4.1.3 page 4-16

Copies of the Spill Response Checklists provided by the DDMT personnel and used to support the findings of the EBS, should be included in the report.

Response:

Reference material is available in Building 144, Room 153.

Comment A-203:

Comment No. 67 Section 4.1.3 page 4-16

Section 4.1.3 should also reference the database search information in Appendix A regarding spills both on the DDMT and at adjacent properties.

Response:

Comment noted. The text has been revised accordingly.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-204:**

Comment No. 68 Section 4.3 page 4-18

We suggest that the third sentence in Section 4.3 (beginning "No documented evidence") be removed since Section 4.3.2 addresses adjacent sites that may have potentially impacted the environmental condition of the DDMT. The names and addresses of adjacent sites of concern should be summarized within Section 4.3.2.

Response:

We do not concur. Summarizing the names and addresses of adjacent sites of concern is beyond the scope of the EBS.

Comment A-205:

Comment No. 69 Section 4.3.2 page 4-20

Section 4.3.2 provides insufficient detail on potential impacts from adjacent properties, as does Table in Section 2-2 (see also Comment No. 31 regarding Section 2.2).

Response:

Comment noted. See the response to Comment A-167.

Comment A-206:

Comment No. 70 Section 4.3.2 page 4-20

In the discussion of offsite sources of contamination, the past uses since 1940 are equally important as what is occurring today or in the recent past.

Response:

Comment noted. The use of a database search is standard practice for an EBS. The database search for this EBS includes reasonably obtainable information for approximately 50 years.

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APPENDIX A**COMMENT RESPONSE PACKAGE****Comment A-207:**

Comment No. 71 Section 4.3 Appendix A

In the portion of Appendix A that deals with unmappable locations a great deal could be clarified with a very minor effort. Many of the sites are known to Depot members, state regulators and the public in general, and do not fall anywhere near the Depot. Also, both PNB and American Resource and Recovery were listed in the RCRA sites found in the computer search, but the current owner of the site is PermaFix, Inc.

Response:

Comment noted. The text has been revised to include this information.

Comment A-208:

Comment No. 72 Section 4.4 page 4-23

Are there any O&M plans or other procedures in place to manage and address the non-CERCLA environmental and safety issues?

Response:

There are a variety of plans available for reference in the Environmental Management Office, Building 144.

Comment A-209:

Comment No. 73 Section 4.4.2 page 4-23

The title of this section is "Lead-Based Paint" but section also addresses potable water supplies. See also Comment No. 45 on Section 3.4.5 regarding water supplies.

Response:

Comment noted. The paragraph on potable water supplies has been deleted from this section.

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Comment A-210:

Comment No. 74 Section 4.4.3 page 4-24

Section 4.4.3, addresses only transformers. What about capacitors, light ballasts, hydraulic fluids, and other potential sources of PCB's?

Response:

Comment noted. The EBS records review did not provide any information regarding capacitors, light ballasts, hydraulic fluids, and other potential sources of PCBs.

Comment A-211:

Comment No. 75 Section 4.4.3 page 4-24

A statement is made about PCB transformers and other items "awaiting disposal" for over four years. Are they cleared at a site or are they really in storage? Four years is a long time on a fairly routine item. Also, while visual inspection for PCB items is a good start, the discovery in the CH2M Hill Study to determine background levels of a high PCB reading in front of the administration building warrants a full inspection and testing from PCB spill clean-up areas.

Response:

The PCB-containing transformers that have been removed from service have been disposed of. Section 4.4.3 has been revised accordingly. According to DDMT personnel, plans are in place for sampling PCB spill clean-up areas.

Comment A-212:

Comment No. 76 Section 4.4.5 page 4-27

Is there any data regarding the lead concentration in soils at either of the pistol ranges?

Response:

Data are not available regarding the lead concentration in soils at either of the pistol ranges. Sampling of these areas is in the planning stages.

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Comment A-213:

Comment No. 77 Section 4.4.7 page 4-28

More information is needed on the historical uses, storage areas, etc. of chlorinated pesticides at the DDMT.

Response:

Comment noted. The EBS records review did not provide any further information on the historical uses and storage areas of chlorinated pesticides.

Comment A-214:

Comment No. 78 Section 4.4.7 page 4-29

In addition to their trade names, please provide the active ingredients for the pesticides and herbicides used at the DDMT.

Response:

This request is beyond the scope of the EBS.

Comment A-215:

Comment No. 79 Section 4.5.1 page 4-30

It does not seem plausible that all of the past remediation at the DDMT can be adequately summarized on one page as is done on page 4-30 of the Draft EBS Report. Table 3-2 indicates that at least twenty seven (27) UST's have been removed or closed in-place at the DDMT, yet there is no mention of any remediation efforts associated with these tank removals in Section 4.5 of the report. We feel that Section 4.5.1 should be expanded to include all past remediation efforts, including sampling results and other documentation used to support the determination of Category 4 for BRAC Parcel Nos. 58, 100, 112, and 122, and the conclusion that no further remediation is warranted for other sites.

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Response:

Comment noted. The tank removals did not have remediation efforts associated with them. The details of the removals are available in referenced reports. NFA sites have been revised to "proposed NFA sites" as the NFA decisions are being re-evaluated.

Comment A-216:

Comment No. 80 Section 4.5.1 page 4-30

The excavation of soils is mentioned several times in the description of past remediation at the DDMT, but there is no mention of how and where these potentially contaminated soils were disposed?

Response:

The text in Section 4.5.1 has been revised to state that potentially contaminated soils were "... treated as special waste and shipped in accordance with applicable federal, state, and local regulations."

Comment A-217:

Comment No. 81 Section 4.5.2 page 4-31 and Figure 5-1

Section 4.5.2 indicates that some remedial actions at Building S873 and area at the southeast corner are ongoing, yet the building is listed in Category 4 which indicates that all removal and remedial actions have been completed. Should Building S873 be Category 5 like the area to the southeast?

Response:

The ongoing activities are not at Building S873; they are outside the southeast corner of the building. The text has been revised to clarify this issue.

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Comment A-218:

Comment No. 82 Section 4.5.3 page 4-31

Sections 4.1.1.2 (OU-2), 4.1.1.3 (OU-3), 4.1.1.4 (OU-4), and Section 4.3.2 all state that some form of groundwater contamination has been detected or is suspected at the Main Installation (i.e., excluding Dunn Field), yet Section 4.5.3 does not address any planned remediation efforts for area other than OU-1. Is this an accurate reflection of the planned remediation efforts and the sampling recommendations? Furthermore, it does not appear that there are any plans or recommendations to investigate groundwater in OU-4, despite the statements of Section 4.1.1.4. Is this correct?

Response:

There are plans to further evaluate all groundwater at the installation. Section 4.5.3 details planned remediation efforts, not investigations.

Comment A-219:

Comment No. 83 Section 4.6 page 4-34

Is there a possibility that Dunn Field may be a reserve enclave?

Response:

Dunn Field may be redesignated a reserve enclave. Text has been added to Section 4.6 to indicate this possibility.

Comment A-220:

Comment No. 84 Table 4-1

If possible, Table 4-1 should contain information on action taken regarding spill cleanup.

Response:

Comment noted. A column has been added to Table 4-1 summarizing information on action taken regarding spill cleanup.

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Comment A-221:

Comment No. 85 Table 4-2

If possible, Table 4-2 should provide information on how much asbestos is present in each building.

Response:

Comment noted. The results of the asbestos survey are available in the reference material in Building 144, Room 153.

Comment A-222:

Comment No. 86 Figure 4-1

For clarity Figure 4-1 should also be identified as Dunn Field.

Response:

Comment noted. Figure 4-1 has been revised to identify Dunn Field.

Comment A-223:

Comment No. 87 Figure 4-3

Many of the Site Identification Numbers on Figure 4-3 are not legible.

Response:

Comment noted. Figure 4-3 has been revised so that the site identification numbers are legible.

Comment A-224:

Comment No. 88 Figure 4-4

Figure 4-4 does not reflect most of the OU-4 site locations provided in the table in Section 4.1.1.4.

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Response:

Comment noted. Figure 4-4 has been revised to incorporate the site locations provided in the table in Section 4.1.1.4.

SECTION FIVE**Comment A-225:**

Comment No. 89 Section 5.1.1 page 5-1

Have the potential impacts of historical pesticide usage or other factors (e.g., groundwater, sanitary and storm sewers) in the area where Building 360 was constructed been considered in its designation as Category 1 (see Section 4.4.7 regarding pesticide usage at the DDMT).

Response:

The potential impacts of historical pesticide usage and other factors were considered in the designation of Building 360 as Category 1. The area surrounding the building has been designated Category 7.

Comment A-226:

Comment No. 90 Section 5.1.2 page 5-2

The summary description of BRAC Parcel 12(2)PS indicates that no sampling results for the site were found. Table 3-2 indicates the tank at this site was 42 years old when removed. Considering the age of the tank, shouldn't sample results indicating clean closure be required to designate the area as Category 2.

Response:

Comment noted. The site will be re-evaluated in future sampling efforts. The category may change.

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Comment A-227:

Comment No. 91 Section 5.1.2

The summary description of many of the Category 2 BRAC Parcels where UST have been removed indicate that there have been "no documented releases associated with the tanks". Is the designation of these sites as Category 2 based on sampling results or "clean closure" determinations by the TDEC? Without such documentation, the designation of many sites as Category 2 may not be justified.

Response:

See the response to Comment A-146.

Comment A-228:

Comment No. 92 Section 5.1.2 page 5-3

The summary description of BRAC Parcel 53(2)HS indicates there have been "no documented releases associated with the parcel", but Section 4.2 of the report indicates "visual evidence of contamination" for Building 210, implying that a release may have occurred which should preclude the parcel from a Category 2 designation. Otherwise maybe the comments in Section 4.2 should be clarified. What was stored in drums at this site.

Response:

Comment noted. Building 210 has been removed from the table in Section 4.2. In addition, Building 210 is proposed NFA Site 41. The proposed NFA sites are being re-evaluated and category designations may change as a result.

Comment A-229:

Comment No. 93 Section 5.1.2 page 5-5

The summary description of BRAC Parcel 111(2)PS/HS indicates that the area was used to store drums within an earthen berm, and Table 3-1 indicates that the year that

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Building 925 was built is unknown. Given these factors and the fact that spill records were not maintained prior to 1990, should Building 925 be designated as Category 2?

Response:

Comment noted. Building 925 was built in 1991. No documented releases are associated with this building. Therefore, Category 2 is appropriate for this parcel.

Comment A-230:

Comment No. 94 Section 5.1.2 page 5-6

The summary description of BRAC Parcel 128(2)PS/HS indicates that Building S1090 is/was used to store a variety of hazardous materials and petroleum products, and Table 3-1 indicates that the year that Building S1090 was built was 1952. Given these factors and the fact that spill records were not maintained prior to 1990, should Building S1090 be designated as Category 2?

Response:

Comment noted. Please see response to Comment A-126.

Comment A-231:

Comment No. 95 Section 5.1.3 page 5-6

The "s" should be deleted from the word "requires" in the second line.

Response:

Comment noted. The text has been revised accordingly.

Comment A-232:

Comment No. 96 Section 5.1.4 page 5-8

More documentation is needed to justify the designation of BRAC Parcel Nos. 100 and 112, and potentially other parcels, as Category 4. Statements such as the contamination was "reportedly" removed are not believed to be sufficient documentation?

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Response:

Comment noted. The word "reportedly" was used to indicate that the cited documentation reported that contamination was removed. To avoid misinterpretation, the word "reportedly" has been deleted.

Comment A-233:

Comment No. 97 Section 5.1.3 and 5.1.4 pages 5-6 through 5-10

Regarding all parcels designated as Category 3 or Category 4, were the removals, remedial actions, and sampling performed in association with the spills or releases at each parcel adequate to eliminate the potential concerns or impacts from the factors which caused the majority of the DDMT to be designated as Category 7 (e.g., the potential for contamination in the north and south parking lots of BRAC Parcel 2(7) and other housing or recreation areas, which caused these areas to be recommended for surface soil sampling).

Response:

Comment noted. Parcels that are designated Category 3 or Category 4 and have the potential for pesticide contamination have been redesignated Category 7.

Comment A-234:

Comment No. 98 Table 5-1a and Table 5-1b

Where possible, please add Building Numbers to Table Nos. 5-1a and 5-1b.

Response:

Comment noted. Building numbers have been added to Tables 5-1a and 5-1b.

Comment A-235:

Comment No. 99 Table 5-1b

What is meant by the term "No current mitigation" in Table 5-1b?

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Response:

The term "No current mitigation" in Table 5-1b indicates that there is no ongoing work being carried out.

Comment A-236:

Comment No. 100 Figure 5-1

Section 4.1 indicates that the earliest documented assessment of environmental conditions was dated 1981. Facilities shown on Figure 5-1 in CERFA Categories 2, 3, and 4 (including Buildings Nos. 210, 490, 649, 873, and 925) are considered "transferable" without further investigation. Considering the lack of information available prior to 1981, it would appear necessary to investigate for potential contamination in those facilities, some of which are listed in Section 4.2. Also, should the map reflect that remediation has been undertaken (Category 5) for military officers housing (i.e. buildings only)?

Response:

Comment noted. Please see response to Comments A-228, A-229, and A-232.

GENERAL COMMENTS**Comment A-237:**

Comment No. 101

Considering that the EBS Report will be a public document, we feel that it is very important for all information and statements regarding existing or potential contamination at the DDMT to be as concise, accurate, and specific as possible. As noted in several comments on Sections One through Five of the report, generic references and incomplete descriptions of known or suspected contamination at the DDMT should be avoided as they may bring about inaccurate public perceptions of the overall environmental condition of the DDMT.

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Response:

Comment noted. We are hopeful that as the EBS report is finalized, it will be as accurate as records can make it.

Comment A-238:

Comment No. 102

In order to facilitate the preparation of Phase I Environmental Assessments for individual parcels or buildings for lease or transfer, it is desirable for the Environmental Baseline Survey Report to be compiled or organized by individual buildings or parcels prior to transmittal. We recognize that this represents a deviation from the established format, but it would be a significant advantage for the Memphis Depot Redevelopment Agency to have the information available in that manner. If this is not feasible, we would like to discuss with you how we can create such an information base.

We request that the following information be transmitted to the Memphis Depot Redevelopment Agency if it is not included in the final EBS Report:

- Aerial Photographs (past and present);
- Facility Maps (past and present);
- Completed Interview Forms;
- Completed Visual Inspection Forms (transmitted to MDRA on 6/27/96);
- UST Notifications Forms;
- UST Removal/Remedial Action Reports; and
- Copies of all sample results, removal/remedial action reports, and other documentation used to support the classification of parcels in Categories 2, 3, 4, and 5, as applicable.

Upon completion of the EBS Report, the MDRA requests copies of all documents referenced in Section 2.1, along with those References listed in Section Six that are specific to the DDMT but which are not referenced in Section 2.1.

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Response:

Comment noted. The reference materials are available in Building 144, Room 153.

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