



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115-1520

February 21, 1997

Commander
Defense Distribution Depot Memphis
Attn: DDMT-DE (Mr. Glenn Kaden)
2163 Airways Blvd.
Memphis, Tennessee 38114-5210

Re: Pre Draft CRP comments, Defense Depot, TDSF #79-736, cc 82

Dear Mr. Kaden:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Pre-Draft Community Relations Plan dated January 1997 and received in this office on 1/29/97. In accordance with the Federal Facilities Agreement (FFA) and the Defense/State Memorandum of Agreement (DSMOA) we are providing the following comments.

If the comments need clarification or further assistance is needed please call at (901) 368-7953.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan English".

Jordan English, Manager
Memphis Field Office
Tennessee Division of Superfund

Enclosure

c: TDSF, NCO file
TDSF, MFO file
Dann Spariosu
United States Environmental Protection Agency
Waste Management Division
100 Alabama Street, SW
Atlanta, GA 30303

**Tennessee Department of Environment and Conservation
Division of Superfund
Comments for
Pre-Draft Community Relations Plan
Defense Depot, Memphis
2/21/97**

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Pre-Draft Community Relations Plan dated January 1997 and received in this office on 1/29/97. This document appears to be a revised draft of a previous Draft-Final CRP dated April 1994. Were there any other subsequent draft versions of this document prior to this January 1997 submittal?

General Comment:

TDSF's greatest concern is that this draft was received in a very rough pre-draft form. Many words were misspelled and grammatical errors were numerous. TDSF agrees that subsequent revisions to an initial draft will be certain; however, attempts should be made to transmit a document that is easy to read, that has been spell-checked and has had a cursory grammatical review. It is also important in a document of this type to be clear with regard to tense as it pertains to activities/events that have begun, have been completed, and those that are in progress.

Care should be taken to not only identify certain elements of the Depot's ongoing processes (FFA, BRAC, MDRA, NPL, Superfund), but to also fully describe these in complete detail as if a person is reading or hearing this for the first time (because many are). It is probably also important to fully define the relationships/non-relationships of the various entities involved (Depot, DLA, DoD, CoE, EPA, TDEC, USGS, MDRA, RAB, BCT, etc.). A full understanding of the various governmental, quasi-governmental, and non-governmental agencies involved will help citizens understand the interrelationships that exist as we work toward environmental clean-up and reuse.

Specific Comments:

1. Page numbers would be helpful in locating items needing revision or discussion.
2. Section I, 7th line - TDSF suggests "...one and the same person..."
3. Section II, end of second paragraph - It may not still be true that the Depot remains one of Memphis' largest employers with 1,300 employees. It is important, although this is a living document, that it be as current as possible at the time of transmittal.
4. Section II - TDSF suggests that a separate section be used to describe environmental concerns. This could be done with bullets or better still in chronological fashion with concerns as they became apparent, then follow with current status/understanding.
5. Section II, third paragraph - We suggest restating the last sentence to read, "The location of several potential industrial contamination sources around the boundary of the Depot may further complicate ongoing investigations regarding groundwater contamination..."
6. Section II, 4th paragraph - TDSF suggests finishing first sentence with, "...in the soils at the Depot as a result of past disposal practices."

7. Section II, 5th paragraph, second sentence - TDSF suggests re-writing this sentence to read, "...because of sufficient concern regarding the potential to contaminate the city's drinking water aquifer, EPA placed the site on the NPL." (If not previously fully defined do so here.)
8. Figure 1 - This map is illegible. TDSF suggests color also.
9. Section II, last paragraph - TDSF suggests rewording this sentence to suggest that "As requirements of the BRAC process an Environmental Assessment (EA) was completed in September 1996, and an Environmental Baseline Survey (EBS) was finalized in October 1996. BRAC sampling was conducted in October 1996 with the results to be available in X 1997."
10. Section III, second paragraph - Is the information in this section current?
11. Section III, B, first paragraph - The vague reference to the closure of three drinking water wells while in a discussion regarding the Depot area could falsely imply that the Depot was necessarily responsible for their closures. Please clarify this.
12. Section V - Previous section headings were followed by capital letter subsections, yet this section has Arabic numbers. TDSF suggests consistency with lettered subsections. This will allow numbered bullets as needed.
13. Section V, 1 (Identify Potential...) - A critical element that should be discussed in this section should be the screening process, including its intent and method.
14. Figure 2 - This figure is not labeled and should be in color.
15. Section V, 3, last paragraph - TDSF suggests not using vague, authoritarian sounding verbiage like "...Government's preferred solution...". If the preferred solution is DoD's then call it such. If that preferred solution is the BCT's then call it such. Also within this paragraph, State should be capitalized because we are discussing a specific site within a specific state, Tennessee. It is unclear to this reviewer whether the ambitious schedule of 1997 can be accomplished for a ROD for this site. Finally, in the last sentence, TDSF suggests rewording to "...Pump and Treat Remedy for groundwater...".
16. Section V, 4 - Need to be specific with regard to RD for Reuse Sites vs. Interim Remedial Action. Maybe need to state RD for IRA.
17. Section V, 5 - TDSF suggests rewording last two sentences to read, "...pumping and treating groundwater can continue for many years. As the investigation and restoration process evolves/continues, fact...".
18. Section VI - Should revise to say "...planned or in place...".
19. Section VI, C - TDSF suggests "...which currently meets...".

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