

BRAL SAMPLING 212

File; C.G. 541. 460, P 12 FEB2 4 1997: 212

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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: Draft BRAC Sampling Program (February 1997) TDEC/DSF #79-736, cc 82

Dear Mr. Kaden:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO), on behalf of the Tennessee Department of Environment and Conservation, has completed review of the above-referenced document received in this office on February 12, 1997.

Pursuant to the DSMOA and FFA, TDSF is providing the attached comments. If any comment does not require a replacement page insert owing to revisions, a written response to that comment will be sufficient. Should you have any questions or concerns regarding this review please call me at (901) 368-7957.

Very truly yours,

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Terry R. Templeton, P.G. Project Manager TDEC/DSF-MFO

 c: TDEC/DSF, NCO - file TDEC/DSF, MFO - file Dann Spariosu United States Environmental Protection Agency Region 4, Waste Management Division 100 Alabama Street, SW Atlanta, GA 30303

TDEC/DSF COMMENTS ON THE Draft BRAC Sampling Program (February 1997)

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Draft BRAC SAMPLING PROGRAM (February 1997)

General Comments

Would a List of Acronyms and Table of Contents be helpful?

Please consider tabbing the section for each parcel.

Where are split sample results (referred to in the Executive Summary) reported?

To facilitate the use of this report for determining action on reclassifying parcels for the CERFA map, the format of data presentation should be fundamentally modified. Some specific suggestions are presented below, but in general numeric screening levels should be displayed with results in a way that allows quick and easy comparison. Exceedances should be highlighted by shading, bolding, or other typographic method. It would also be helpful if the results, especially where screening levels are exceeded, could be portrayed on a map.

Specific Comments

Executive Summary, Tables 1-4:

The actual guidance values (background, RBC, etc.) should be reproduced here. The summary format with "Ys" indicating an exceedance of a screening level is not very useful.

Executive Summary, Tables 3 and 4

Please consider including a column to show the actual level detected for each of the contaminants that are listed as having exceeded a screening level.

Executive Summary, Table 5

The reference to concrete wipe sampling rather than air sampling may be in error.

Parcel Sampling Reports (all):

For consistency, why don't all reports have a Sampling and Recommendations section (like Parcels 4 and 35) even if the recommendation is no action?

TDEC/DSF COMMENTS ON THE Draft BRAC Sampling Program (February 1997)

Parcel Sampling Report Tables (all):

It would be helpful if contaminants with exceedances (reported individually in Table 1) could also be highlighted in Table 2. A column for the reference screening value should also be considered.



