



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 214



REC'D FEB 25 1997

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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 24, 1997

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

RE: Groundwater Interim Remedial Action, Revised Concept Design Submittal,  
January 1997  
TDEC/DSF #79-736, cc 82

Dear Mr. Kaden:

The Tennessee Department of Environment and Conservation, Division of Superfund (TDSF), Memphis Field Office (MFO), received the above-referenced document on February 12, 1997. Although this document is not at an appropriate stage of completion to warrant a review, TDSF is providing the attached comments as a means to facilitate completion of the document. Please also refer to the Division's comments on the previous Concept Design Submittal dated June 6, 1996.

General Comments:

The General Comments from the Division's June 6, 1996, letter also apply to this document.

Sections 4, 5 and 6 of Part I, and Parts II and III are engineering/design-oriented portions of the document, and the Division has no comments on them. The Division did receive the Groundwater Interim Remedial Action 50% Design Submittal and forwarded it to the Division's Technical Section for review. Presumably all engineering matters discussed in the Groundwater Interim Remedial Action, Revised Concept Design are suitably covered in the 50% Design and will therefore be accounted for in the Division's review of the 50% Design.

## Specific Comments

### *Section 1*

Why was a subsection on "Hydrogeology and Site Characterization" that appeared in the May 1996 submittal omitted from the current version?

### *Section 1, Introduction*

Some of the statements in the Introduction are representative of the overall problem with this document.

- a) There is no explanation of why thirteen was determined to be the number of wells or how their locations were chosen.
- b) It is misleading to state that the "initial design was *stopped* (emphasis added) in August 1996 to perform detailed groundwater modeling."
- c) The changes in the plan for number of location of wells could have been avoided if modeling had been done first.

Since the modeling efforts were performed in the middle of system planning rather than in advance, delays have occurred that could have been avoided. One of the Division's major concerns is that well placement and design will be convenient rather than optimum. Until the modeling data is made available for review so that the Division, and other regulators, can determine whether well location, etc. is designed satisfactorily, review and approval of the Final Design cannot occur.

### *Section 1.1, page 1-1, first paragraph, last sentence*

Should "each of" be inserted between "At the end of" and "the first two phases,..." for clarity?

### *Section 1.1, page 1-1, second paragraph, last sentence*

Should "whether or not" be inserted before "it will be captured..."?

### *Section 1.1, page 1-1, third paragraph*

What is meant by "The results of the WES modeling should be reported..."? Any such report should include the geologic data and other hydrogeologic parameters that influenced the modeling, not just engineering parameters such as pumping rates, particle tracking analysis, etc.

### *Section 2.1.1, page 2-2, second paragraph, last sentence*

The word "be" should be inserted between "will still" and "required."

*Section 2.2.1, page 2-2, first paragraph, last sentence*

The second word ("were") should be deleted.

*Section 2.2, Exhibit 2-1*

Exhibit 2-1 is referenced on page 2-2, a blank sheet labeled Exhibit 2-1 appears as page 2-3, Exhibit 2-1 is referenced again on page 2-6, and a figure labeled Exhibit 2-1 appears on page 2-7. The context of the references to Exhibit 2-1 does not make it clear whether the same figure is required for both Exhibits 2-1. Please clarify.

*Section 2.2.4, page 2-6, first paragraph, last sentence*

The word "be" should be inserted between "will" and "provided."

Should you have any questions or concerns regarding these comments please call me at (901) 368-7957.

Very truly yours,



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

c: TDEC/DSF, NCO - file  
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**ADMINISTRATIVE RECORD**

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**ADMINISTRATIVE RECORD**

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