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THE MEMPHIS DEPOT
TENNESSEE

ADMINISTRATIVE RECORD
COVER SHEET

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-3104

January 20, 1998

Mr. Glenn L. Kaden, REM
BRAC Environmental Coordinator
Defense Distribution Center Memphis
2163 Airways Blvd.
Memphis, TN 38114 - 5210

Re: **Comments on the Draft Work Plan to Conduct Site Characterization of An Engineering Evaluation/Cost Analysis at Operable Unit 1, Defense Distribution Depot Memphis, Tennessee.**

Dear Mr. Kaden:

The United States Environmental Protection Agency (U.S. EPA) has completed its review on the Draft Work Plan to Conduct Site Characterization of An Engineering Evaluation/Cost Analysis at Operable Unit 1, Defense Distribution Depot Memphis, Tennessee. This review only includes comments on the Risk Assessment section. Please refer to the letter dated January 8, 1998 to obtain a complete set of comments on the subject document.

Any questions please feel free to contact me at 404-562-8513.

Sincerely,

Ramon Torres
BRAC Project Manager

Enclosure;

cc: Jordan English, TDEC, w/Encl.
Shawn Phillips, DDMT, w/Encl.

General Comment:

1. Although an EE/CA calls for a "streamlined risk assessment", the details of the risk assessment presented in this work plan were very sketchy.

   Both mustard and lewisite were disposed in this area and the document indicates some concern for UXO. Of course, the first activity would be to certify the area safe enough vis-a-vis UXO to proceed with planned activities. Assuming this can be done, any other UXO hazard should be dealt with using the methods prescribed in the proposed munitions range rule, 32 CFR 178.

   There were no plans presented to assess risk from mustard, lewisite or other chemical agents that may be present. The Army Environmental Center (Aberdeen, MD) has developed provisional toxicity values for chemical warfare agents. The National Academy of Science Committee on Toxicology is presently reviewing these values. Clearly, these values are provisional until accepted by the NAS and EPA; however, they should be used for assessing risk of chemical warfare agents for the purposes of this EE/CA.

   One caveat about mustard - when disposed of in soil, mustard forms globule that develop an oxidized "skin." This "skin" is resistant to chemical degradation and keeps the internal globular mustard fresh and active. Digging on site should be done extremely carefully and with the advice of a chemical warfare expert.

   Additional documentation should be submitted that details the risk assessment to be performed to support the EE/CA.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE