



THE MEMPHIS DEPOT TENNESSEE

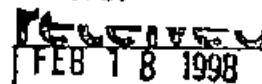
ADMINISTRATIVE RECORD COVER SHEET

AR File Number 285



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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 17, 1998

Memphis Depot Caretaker
ATTN.: DDSP-FE (Mr. Glenn Kaden, BEC)
2163 Airways Blvd.
Memphis, Tennessee 38114-5210

RE: TDEC/DSF #79-736, cc 82
Baseline Risk Assessment, Safety and Health Plan, and Sampling and Analysis Plan for Golf Course
Impoundments, December 1997 and
Draft Preliminary Risk Evaluation, January 1998

Dear Mr. Kaden:

The Tennessee Division of Superfund, Memphis Environmental Assistance Center (MEAC), on behalf of the Tennessee Department of Environment and Conservation (TDEC/DSF), has completed a preliminary review of the above-referenced documents received at this office on January 26, 1998. Pursuant to the DSMOA and FFA, TDEC/DSF is providing the attached comments. These preliminary comments are primarily non-technical in nature (with respect to the risk values). Additional comments will be provided by Nashville Central Office personnel at a later date.

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 concerning these comments please don't hesitate to call me at (901) 368-7953.

Very truly yours,

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

c: TDEC/DSF, NCO - file
TDEC/DSF, MEAC - file
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Ramon Torres

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Region 4, Waste Management Division
61 Forsyth St.
Atlanta, GA 30303

TDEC/DSF COMMENTS ON THE
Draft Preliminary Risk Evaluation, January 1998
for
Defense Distribution Depot Memphis
TDSF #79-736 cc:82

Specific Comments

1. *Executive Summary, page E-2, last paragraph*
The next to last sentence refers to groundwater "flowing offsite" and being "channeled" through two wells. TDEC/DSF believes this presents an inaccurate characterization of groundwater hydrology that could confuse the public. All groundwater beneath the Main Installation obviously does not "flow" through those two wells, only some of it does.
2. *Section 3, page 3-1*
Section numbering skips from 3.1 to 3.3.
3. *Section 3.3, page 3-1, third bullet*
The reviewer could not locate the maps referred to as being "presented only in Appendix A."
4. *Section 3.3.1, page 3-5*
TDEC/DSF once again disagrees with the explicit statement that there is "no evidence indicating a connection between the Fluvial Aquifer and the ... Memphis Sand"
In addition, it is possible that additional data from more monitoring wells in the central part of the facility may change the stated interpretation regarding groundwater flow across the Main Installation.
5. *Section 3.3.3, page 3-6, second paragraph*
Regarding groundwater RBCs, are you referring to the soil transfer to groundwater values? Shouldn't groundwater screening criteria be MCLs?
6. *Figures 4-1 through 4-4, pages 4-2 through 4-5*
At one point we discussed producing a map showing contoured risk values. The risk shown on these maps seems to be for specific sample locations only. Is there a way to show "weighted average risk" over an area? In addition, please note that "scenerio" in the figure titles should be spelled "scenario."
7. *Section 4.1.2, page 4-14, last paragraph, last sentence*
In the last part of this sentence, "the results for the residential comparison was included" should read "... were included"

TDEC/DSF COMMENTS ON THE
Baseline Risk Assessment, Safety and Health Plan, and Sampling and Analysis Plan for Golf Course
Impoundments, December 1997
for
Defense Distribution Depot Memphis
TDSF #79-736 cc:82

General Comment

TDEC/DSF is not completely satisfied as to whether the fish species that are likely to be eaten by humans and were previously reported as being stocked or observed in Lake Danielson (bluegill, bass and catfish) have been accounted for. Although none of these species were caught during recent sampling, these species' complete absence is not proved. It is stated that the calculated risk (which is acceptable) assumes "that there are edible fish in the impoundments." Page 8-5 states that "humans are unlikely to eat Arkansas shiners, but the sample data were used as surrogates for edible fish species, since the shiners were the only fish obtained from the ponds." Our concern is that if there are actually bluegill, bass, or catfish in the lake then sample results from those species might change the risk numbers. TDEC/DSF acknowledges that no species other than Arkansas shiners were caught or observed at this time, but uncertainty regarding the presence of the other, more likely to be eaten species remains.

Specific Comments

1. *Section 1.0, page 1-1, second paragraph, second sentence:*
Should "The Depot's mission is to receive..." be changed to "...mission was to receive..."?
2. *Figure 1-1, page 1-2:*
There is an east-west segment of highway north of DDMT shown as an interstate highway that is actually a surface street. Please correct
3. *Section 2.0, page 2-1, first paragraph:*
Should "at a" be inserted between "released" and "site" in the second sentence?
4. *Section 2.0, page 2-1, second paragraph:*
Should the word "pathway" in the fifth sentence be "pathways"?
5. *Section 2.0, page 2-2, third paragraph, last sentence:*
The sentence should be corrected as shown. "The actual risk posed...but areis usually believed..."
6. *Section 2.0, page 2-2, last paragraph:*
The acronym ERA should be preceded by "an."
7. *Section 5.0, page 5-4, first paragraph:*
Isn't the 95 UCL often higher than the maximum detected concentration?
8. *Section 6.3, page 6-2, first paragraph:*
The NOAEL is stated to be 42 mg/kg/day, but liver tumors are cited from an exposure of 19 mg/kg/day. Please clarify.
9. *Section 6.7, page 6-8, second paragraph:*
Should "NOEL" actually be "NOAEL"?

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10. *Section 8.0, page 8-1 ff.:*

It is unclear whether any angling was attempted in the golf course pond.

11. *Section 11.0, page 11-1, first paragraph:*

It is somewhat unclear whether the cancer probability of 7 in a million is a result of past or current fish tissue samples. It is also unclear whether the assumption that the Arkansas shiner samples "are representative of the muscle tissue of edible fish that might occupy the ponds in the future" is justified.

12. *Figure 4-1 in the Sampling and Analysis Plan and Figure 1-2 in the Safety and Health Plan:*

These figures are blank.

13. *Section 2.1.3, page 2-3 in the Safety and Health Plan:*

Should "water Micatin" actually be "water moccasin"?

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