



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

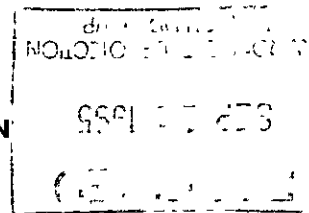
AR File Number 380



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

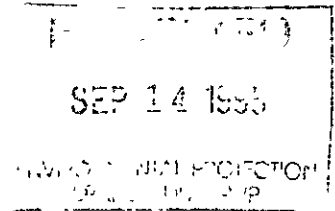
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September 8, 1995

Commander
Defense Distribution Depot Memphis
Attn DDMT-WP (Mr Frank Novitzki)
2163 Airways Blvd,
Memphis, Tennessee 38114-5210



Re: Draft-Final Record of Decision for Interim Remedial Action of the Groundwater at Dunn
Field (OU-1) at the Defense Depot, Dated August 1995, TDSF #79-736, cc 82

Dear Mr Novitzki.

The Tennessee Division of Superfund (TDEC) Memphis Field Office (MFO) has reviewed the
above referenced document received in this office on 8/17/95 Pursuant to the DSMOA and FFA
TDEC has several comments (Attached). TDEC suggests revising the document accordingly.
Please provide a comment response for any items commented on that are not anticipated to be
allowed for in any revision.

Should you have any questions or concerns regarding this review or the Site in general please call
me at (901) 368-7953 or Terry Templeton at (901) 368-7957

Sincerely

Jordan English
Manager
Memphis Field Office
Tennessee Division of Superfund

Enclosure

c TDSF, NCO file
TDSF, MFO, TRT, file
Martha Berry
United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N E
Atlanta, GA 30365

**Comments on the
Draft Final
Record of Decision for the
Interim Remedial Action for
Dunn Field Groundwater at
Defense Depot Memphis
TDSF # 79-736
Received 8/17/95**

General Comments:

There appears to be a tendency to "soft-sell" the potential problems at the Depot (Specific Comments 6, 11, and 14 below). Tell it like it is! Also, it would be wise to involve a geologist/hydrogeologist who has reviewed the available literature related to regional and local geology/hydrogeology in the review of all documents (Specific Comments 1, 8, 9, 10, 11 and 14 below).

Specific Comments

1. Acronyms, page iv--NGVD stands for National Geodetic Vertical Datum
2. Section 1.4, page 1-1--TDSF suggests re-writing the next to last sentence on the page to read "...follow-on activities include monitoring the groundwater plume and its response to the IRA."
3. Section 1.2, page 1-1--In the next to last sentence, "IROD" is an undefined term/acronym. Perhaps "IRA ROD" would be more understandable and these terms are separately defined in the acronym list.
4. Section 1.5, page 1-2, second sentence--This is a run-on sentence TDSF suggests "...permanent or final remedy. However, it is intended to be compatible..."
5. Section 1.5, page 1-3, last sentence--TDSF suggests re-wording this sentence "Because this interim remedy does not include removal of **all** hazardous substances **that are** above health based levels, a review will be conducted ."
6. Section 2.2, pages 2-4 & 2-5--The last sentence on page 2-4 states that DDMT was placed on the NPL because of its scoring on the HRS. While this is true, technically, it fails to convey to the public the true nature of the reason why it received the score it did. This section should be re-drafted to describe what actual conditions at the Depot factored into the NPL listing.
7. Section 2.4, page 2-7, first sentence--The end of this sentence should be re-worded. TDSF suggests "...from past disposal practices at the Depot."
8. Section 2.5.1, page 2-7, Section Heading--The primary focus of this section appears to be physiography. TDSF suggests changing the heading to reflect this and moving the last

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ADMINISTRATIVE RECORD

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