



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 383



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED
OCT 23 1995

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OCT 19 1995

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

SUBJ: Defense Distribution Depot Memphis (DDMT), TN
EPA I.D. TN4 210 020 570


Dear Mr. Novitzki:

EPA has completed its review of the following document:

- o Draft Record of Decision for Interim Remedial Action of the Groundwater at Dunn Field (OU1) at the Defense Depot Memphis, Tennessee - CH2MHill, August 1995.

EPA's comments on this document are enclosed with this letter. If you have any questions about these comments, please contact me at 404/347-3555, vmx. 6431.

Sincerely,


Martha Berry
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jordan English, TDEC
John Romeo, COE

EPA COMMENTS
Draft ROD for Interim Record of Decision
of the Groundwater at Dunn Field - DDMT
August 1995, CH2MHill

- o Cover Page - For the sake of continuity, the name of the facility in the title should be "Defense Distribution Depot Memphis".
- o Page v, 3rd paragraph - The last sentence should specifically reference the pretreatment provision is part of the contingency remedy.
- o Page 1-1, Section 1.2, 2nd paragraph - There is a typo in the second-to-last sentence - "daft" instead of "draft".

Please change the last sentence to read "The U.S. EPA and the State of Tennessee concur with the selected interim remedy."

- o Page 1-1, Section 1.3 - Please delete the second sentence. This section should contain only the required legal language describing the assessment of the site.
- o Page 1-1, Section 1.4 - The contingency remedy should be mentioned here.
- o Page 1-2, Section 1.5 - The third sentence seems to be missing some words - suggest that it may mean to read as follows "It is not intended to be the permanent solution and uses alternative treatment technologies to the maximum extent practicable for this interim response."

The language regarding the need for the five-year review process implies that five year review process doesn't start until the final remedial action decision has been made. This is not correct. Suggest deleting the last sentence on page 1-3 and substituting the following "Because this remedy will result in hazardous substances remaining onsite above health-based levels, a review will be conducted to ensure that the remedy continues to provide adequate protection of human health and the environment within five years after the commencement of this remedial action. Because this is

an interim action ROD, review of the remedy will be ongoing as DDMT continues to develop the final remedial action for OU1."

- o Page 2-1, Section 2.1, 1st paragraph - The second to last sentence indicates that it is describing the installation itself. The sentence should be modified to make it clear that it is referring to the area around the installation.
- o Page 2-1, Section 2.1, 3rd paragraph - A sentence should be added at the end of this paragraph referring the reader to Section 2.4 for a more detailed description of operable units.
- o Page 2-4, 4th complete paragraph - It should be clarified that the "RI" referred to in this paragraph is the Law report and it was not accepted by either regulatory agency as the final RI for the installation.
- o Page 2-5, 1st sentence - This sentence should be clarified to read that DDMT was added to the NPL because of its Hazard Ranking Score, not because EPA prepared the scoring package.
- o Page 2-5, Section 2.3 - There is an extra line between the first and second paragraphs of this section.

The third paragraph should name the publications that ran the public notice.

Transcripts are not available from the RAB meetings, meeting minutes are.

- o Page 2-6, Section 2.4 - The second paragraph should reference Figure 2 for the reader. Also, the discussion about operable units seems confusing. There is a good discussion of this same subject in Section 2 of the September 1994 SMP - suggest borrowing some of that discussion.
- o Page 2-9, Section 2.5.3 - The last sentence of the first paragraph should be revised as follows "To date, constituents of concern in the Fluvial Aquifer have not been detected in Memphis Sand Aquifer groundwater samples in the vicinity of the site."
- o Page 2-11 - The last paragraph before Section 2.7 seems confusing. Suggest dropping the "acceptable exposure

levels" reference and changing the last sentence to read "No changes were made to the preferred alternative as presented in the Proposed Plan."

- o Tables 3 and 4 - There are no tables listing chemical specific ARARs. Is this an oversight or is this correct? If this is an oversight, then the listing of tables on page iii also needs to be corrected.
- o Page 2-28, Section 2.9 - The discussion in the second paragraph should clearly identify Alternative Three as the contingency remedy. It should also describe the criteria by which the decision to implement the contingency remedy will be based (i.e. the conditions listed in the discharge permit).
- o Page 2-29 - There is a missing section here. Section 2-10 should contain the description of how the selected remedy meets the statutory requirements in SARA. The reference section should be renumbered Section 2.11. These changes also need to be reflected in the Table of Contents on page ii.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE