



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 41



41 1

File: 541.460.d
C.G. 41

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

OCT 1 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commander
Defense Distribution Depot Memphis
Attention: DDMT-WP (Christine Kartman)
2163 Airways Blvd.
Memphis, Tennessee 38114-5000

Re: Draft Site Management Plan
Defense Distribution Depot Memphis (DDMT); Memphis, Tennessee
EPA I.D. No.: TN4 210 020 570

Dear Ms. Kartman:

The Environmental Protection Agency (EPA) has completed its review of the Draft Site Management Plan which was received in this office on August 17, 1993. Our comments are enclosed. As stated in Section XXI.D. of the Federal Facilities Agreement (FFA), the final Site Management Plan shall be attached to the FFA as Appendix C. Therefore, in order to avoid any delay in finalizing the FFA, EPA requests that DDMT revise and resubmit the SMP as soon as possible and no later than thirty (30) days from your receipt of this letter.

If you have questions or concerns regarding our enclosed comments, please contact me at (404) 347-3016.

Sincerely,

Allison W. Drew
Remedial Project Manager
Department of Defense Remedial Section
Federal Facilities Branch

Enclosure

cc: Michael Dell'Orco, USACE Huntsville
Bill Forrester, TDEC
Jordan English, TDEC

REVIEW AND COMMENT
DRAFT SITE MANAGEMENT PLAN
DEFENSE DISTRIBUTION DEPOT MEMPHIS, TENNESSEE
(DDMT)

1. Page 3, Section 1.1.2, Item (d):

As per Section XXI. of the Federal Facilities Agreement (FFA), the Site Management Plan must contain enforceable schedules for the current ("FY") year and one subsequent ("FY+1") fiscal year. Please revise as needed.

2. Page 3, Section 1.1.3:

As per Section XXI. of the Federal Facilities Agreement (FFA), the draft Site Management Plan must be submitted to the Parties for review by February 1 of each year. Please correct as needed.

3. Page 4, Section 1.3:

Please expand this section to present and describe any other regulatory bases (e.g. RCRA/HSWA Permit) for the environmental work which has been performed at DDMT to date.

4. Pages 4 through 7, Section 1.4:

This section must be drastically shortened. Please revise to include only a list of report titles which have been completed and state that further description of these studies may be found in Appendix B of the FFA.

5. Pages 7 through 8, Section 1.5:

A. "This SMP provides a SWMU installation restoration program event management plan." Use of the RCRA term SWMU in the Site Management Plan (SMP) is somewhat confusing, since the activities and schedules addressed in SMP apply to both CERCLA and RCRA regulatory programs. The requirement to submit an SMP is also a CERCLA requirement under the FFA. Please substitute the more general term "site" for SWMU, both here and throughout the SMP. Use of the term installation restoration program is also overly limiting, since the events addressed in the SMP will also address the regulatory requirements of CERCLA, the NCP and RCRA. Please revise the text accordingly.

B. The text should clearly state that Operable Units (OUs) consist of individual sites for which an RI/FS has been required. For planning and coordination purposes, screening sites should be assigned to one of four groups, depending upon which OU they will likely be assigned to if an RI/FS is needed.

C. "...coordinates the list of RFA and SWMU sites...". Since all SWMUs are listed in the RCRA permit, and this SWMU list was derived from the RFA, the two lists referenced here are identical. What must be coordinated is the RFA SWMU list and the list of "RI/FS" sites identified in the Low 1990 Remedial Investigation Report. Please correct as needed.

D. Please delete the reference to Phases I and II. While it is recognized that all of the data needed to complete the RI/FS may not be collected in a single field effort, additional field efforts should be performed on an as-needed, rather than an as-planned, basis.

E. The text must be revised to indicate that schedules for the first outyear (i.e. 1995 for the FY94 SMP) are enforceable, as per Section XXI. of the FFA. Schedules for subsequent enforceable years (i.e. 1996 and beyond) are projected.

6. Page 8, Section 1.5.1:

A. "This process will attempt to reduce lengthy and exaggerated interim report development and review times by allowing continual data assessment and rapid decision-making." Please delete this sentence. It is assumed that no interim reports will be prepared unless requested by an FFA Party, agreed to by all three

Parties and set forth in the SMP schedules.

B. Please revise the final sentence of this paragraph to read: "Decisions concerning data assessment and actions to be taken will be tentatively agreed to during Remedial Project Managers (RPM) meetings which will include representatives from EPA, TDEC and DDMT, and finalized through follow-up correspondence. Also, please move this sentence to a subsection by itself.

7. Page 8, Sections 1.5.2 and 1.5.3:

A. Please revise the first sentence of this section to read: "If initial data evaluation shows any contaminated media to be an immediate threat to human health or the environment, interim actions may be performed to mitigate this threat."

B. Please add the following sentence to the end of Section 1.5.2: "This approach is already being used to address the groundwater contaminant plume beneath the numerous individual sites at Dunn Field.

C. Please revise the first sentence of Section 1.5.3 to read: "Through use of the above approaches, the RI/FS process...."

D. Please move the text in Sections 1.5.2 and 1.5.3 to the end of Section 1.5.1. The text provided in comment 6.B. should then become Section 1.5.2.

8. Page 9, Section 1.6.1:

A. Please delete the words "and remedial" from the first sentence of this section.

B. Please revise the second sentence of section to read: "The goals of these efforts have included adequate characterization of past releases, site identification, and identification of potential contaminants of concern and potential pathways for human and ecological exposure to contamination."

C. In the final sentence of this section, please insert the following text after the word "fully": "...identify the contaminants of concern and...".

9. Page 9, Section 1.6.3:

A. Please revise the first sentence of this section to begin: "A serious source of contamination...".

B. Please delete the second sentence of this section. In general, the SMP should not contain text which reflects some degree of value judgement or draws a significant conclusion. As a tracking tool, the SMP text should be limited to statements of fact which represent straightforward conveyence of existing information and data.

10. Page 10, Section 2.0.1:

A. Please revise the first sentence of this section to read: "All sites that have been identified in either the EPA RFA Report (A.T. Kearney, 1990) or the document entitled Remedial Investigation Report (Law, 1990) have been clustered into one of the following: four (4) OUs (consisting of sites requiring an RI/FS), four (4) screening site groups (consisting of sites requiring a PA/SI-type investigation), a list of No Further Action (NFA) sites or a list of sites on which TDEC will take the lead."

B. According to the RCRA/HSWA permit, SWMUs 35, 36, 37, 38 and 39 are RCRA regulated units which will require TDEC oversight only. EPA recommends that the Parties discuss this issue in order to come to a mutual agreement as to how the investigation and remediation of these sites will be handled.

C. Please insert the following text before the final sentence of this section: "At such time, the schedules for these sites will immediately become enforceable. Any such changes in site status (e.g. screening sites) shall in no way impact the

existing enforceable schedules, unless mutually agreed to by the Parties."

12. Page 10, Section 2.0.2:

Given the large number of screening sites, these sites must be subdivided into smaller groups for purposes of investigation (for e.g. by potential OU, as recommended in preceding comments). This is necessary to ensure that screening site investigations are completed in a timely manner which allows them to be added to an OU, if needed, without impacting the existing enforceable schedule for that OU.

13. Page 11, Section 2.0.3:

Please delete this section.

14. Page 11, Section 2.1:

A. Please delete the first sentence of this section.

B. The Law 1990 report title must be underlined or enclosed in quotation marks to indicate that an exact document title is being quoted. Please correct here and throughout the SMP as needed.

15. Page 11, Section 2.1.1, Paragraph 2:

Please replace the final sentence of this paragraph with the following text: "The following sections provide a brief description of each OU."

16. Page 12, Figure:

Please revise this figure to illustrate the OU boundaries more clearly.

17. Pages 13 through 15, Tables 2.1 through 2.5:

A. It will be extremely confusing to carry multiple sets of site names and numbers, derived from multiple historical documents, throughout the response action process. In order to facilitate the site tracking process, each site must be assigned a single site number and name, to be used in all future document submittals and correspondence pertinent to that site. The SMP, which will serve as the tracking tool for the entire response action process, is the ideal place to document this site number and name. Coordination of multiple lists is necessary only to ensure that all existing information and data for a site is associated with that site for purposes of investigative scoping and planning. Such coordination should be accomplished in the appropriate work plan documents, rather than in the SMP.

B. In order to verify that all sites are correctly identified and assigned to the appropriate OUs (RI/FS sites) and potential OUs (screening sites), a site location map must be prepared for either the entire facility or, preferably, for each of the four OUs. At a minimum, this map must illustrate the locations of all RI/FS and screening sites through use of a bullet or some other symbol. Site boundaries should be provided whenever possible. Such a map(s) is necessary in order to assure effective management and tracking of the response action process for the large number of sites (approximately 75) identified at DDMT.

18. Page 13, Table 2.1:

Please add the following sites to OU 1:

AOC-A : Dunn Field Drainage Ditch
RI/FS Site 26 : NE Quadrant Drainage Ditch

An RI/FS for these sites can be accomplished with a minimal amount of sampling, and data from these locations will likely be needed to complete the ecological risk assessment for OU 1.

19. Page 14, Table 2.2:

Please add the following site to OU 2:

SWMU 33 : Sandblasting Waste Accumulation Area @ Bldg. 1088

Given the close association of this site with SWMU 32 (Sandblasting Waste Accumulation Area @ Bldg. 1088), these two sites should be investigated together in order to assure efficient completion of an adequate investigation for this area with minimal duplication of effort.

20. Page 14, Table 2.3:

Please add the following sites to OU 3:

- AOC-B : Lake Danielson Outlet Ditch
- AOC-C : Golf Course Pond Outlet Ditch

The surface water run-off pathways associated with SWMUs 25 (Golf Course Pond) and 26 (Lake Danielson) should be investigated along with these water bodies in order to assure efficient completion of an adequate investigation, and risk assessment, for these areas.

21. Page 14, Table 2.4:

If an acceptable start date and schedule is provided and adhered to as an enforceable schedule, the following SWMUs may be downgraded to screening status, given the investigations and removal actions which have been completed for these sites to date:

- SWMU 42 : Former PCP Dip Vat Area
- SWMU 43 : Former Underground PCP Tank Area
- SWMU 46 : Former PCP Drying Area

22. Page 15, Table 2.5:

A. As requested in previous comments, please divide this table into four separate tables, including one for each OU which lists those screening sites which may be included in that OU if upgraded to RI/FS status. Separate tables listing (i) No Further Action sites and (ii) sites on which TDEC will take the lead, must also be prepared as needed.

B. The following sites must also be included in one of the six above-mentioned lists:

- RI/FS Site 29 : Food Supplies (Areas A,B,C,D)
- SWMU 22 : Hardware Burial Site
- SWMU 23 : Construction Debris & Foods Burial Site

23. Pages 16 through 26, Section 2.2:

A. The readability of this section should be improved through the use of section headings, bold type, or underlining to draw attention to OU and site names.

B. In those cases where the potential contaminants for a site are not readily apparent from the site name, please preface the site description with a sentence listing anticipated or potential contaminants.

24. Page 19, Section 2.2.1.4:

Please delete this paragraph. See comment 9.B.

25. Pages 19 through 20, Section 2.2.2.2:

Please delete the fourth sentence of this section. See comment 9.B.

26. Page 22, Section 2.2.3.2:

Please delete the following text: "...but don't necessarily indicate contamination as a result of DDMT activities...". See comment 9.B.

27. Page 23, Section 2.2.4:

Please delete the third and fourth sentences from the first paragraph of this.

section. See comment 21.

28. Page 23, Section 2.2.5:

This section includes a brief description of only four screening sites. A description of similar length must be provided for each screening site. For sites where no sampling has been performed, this description can be based on existing historical information, RFA descriptions, field observations, etc.. These descriptions should also be grouped based on the OU to which they may be assigned.

29. Page 26, Section 2.2.6.1:

Please delete this paragraph. See comment 21.

30. Page 26, Section 2.2.6.2:

A. Please move the descriptions of SWMUs 42, 43 and 46 to the appropriate portions of Section 2.5 on screening sites.

B. Please delete the final sentence of this section.

31. Page 28, Section 3.0:

A. Please delete the final sentence of paragraph "b..".

B. Please delete paragraph "c." and replace with the following text: "The time lines provided list the duration, in days, of each activity. Unless otherwise indicated, these activities run end to end (i.e. each activity shall begin the day after completion of the preceding activity). The start date for each schedule is the contract award date. A schedule which includes actual dates will be provided to the Parties no later than 14 days after the contract award date."

C. Please delete paragraph "d.". This paragraph direct contradicts the FFA language which states that any Party may request an extension on any portion of the enforceable schedules.

32. Page 29, Section 3.1:

The submittal dates for Primary Documents in 1995 are enforceable, not projected, due dates. See comment 1.

33. Pages 30 through 37, Schedules for OUs 1-4:

The following comments are provided relevant to the subject schedules:

A. Please place the portion of the schedule which addresses the review and approval of generic work plan documents into a separate generic schedule and delete it from each of the OU-specific schedules. These documents will only be prepared and approved once, and should not impact any subsequent OU-specific schedules. All generic work plan documents must be submitted for review concurrently.

B. If possible the first OU-specific RI/FS Work Plan (i.e. the work plan for OU 1) should be submitted concurrently with the generic work plan documents.

C. Please provide 60 days for agency review of all draft RI/FS Work Plan documents.

D. 200 days for field work at each OU is excessive. Further justification must be provided in order for EPA to consider this lengthy time period for approval. Please note that the schedule for each OU must provide an OU-specific field work duration period. It is anticipated that field work durations will vary from one OU to the next, depending on the number of sites, the complexity of the investigation, etc..

E. If possible, field work and data validation efforts should be overlapped.

F. The Draft Feasibility Study Report must be submitted no later than 2-3 months after the draft Remedial Investigation Report.

G. The Draft Proposed Plan should be submitted simultaneously with the Draft Final Feasibility Study Report.

H. The Draft Record of Decision should be submitted simultaneously with the Draft Final Proposed Plan.

I. The schedules provided suggest that the RI/FS process for all four OUs will start, and be carried through to completion, concurrently. This defeats the purpose of dividing the work effort for the numerous sites at DDMT into smaller, more manageable groups or OUs. Work on each subsequent OU should start no earlier than two months after the start date for the preceding OU. This will ensure that the Parties are not simultaneously preparing, or reviewing, documents for multiple OUs.

J. Screening site schedules must be arranged such that work on these sites will be completed in a timely manner which does not interfere with the completion of work at any OUs (e.g. in the instance that a screening site must be upgraded and included in an existing OU). Simultaneous investigation of the large number of existing screening sites may not allow the Parties to attain this goal. Please revise the screening site schedule accordingly.

34. Page 41, Dunn Field Interim Remedial Action (IRA) Schedule:

A. Please delete all headings and subheadings related to acquisition of the DDMT contract.

B. According to item 11, the public is reviewing the engineering and environmental reports prior to regulatory approval (i.e. at the draft final stage). This is not in accordance with either RCRA or CERCLA public notice requirements for any type of response action and may not be in the best interests of DDMT. Please revise the schedules to include all required public notice and review requirements at the appropriate point in the schedule.

C. Given the document titles provided in this schedule, it is unclear what type of response action is being performed and what type of regulatory requirements DDMT is intending to meet by this action. Regardless of the type of the response action chosen (e.g. removal, remedial, RCRA Interim Measures), the pre-design schedule, as shown, is incomplete and must be revised.

D. The design & construct portion of the schedule must be revised to include review and revision periods for the indicated submittals.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE