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THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 466

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September 10, 1998

4WD-FFB

Mr. Shawn Phillips
BRAC Environmental Coordinator
Defense Distribution Center Memphis
2163 Airways Blvd.
Memphis, TN 38114 - 5210

SUBJECT: Review of Draft Field Sampling Plan Addenda for OUs 2, 3, 4, and Screening Sites at the Defense Depot Memphis Tennessee (DDMT)

Dear Mr. Phillips:

The United States Environmental Protection Agency, Region 4 (EPA) has completed its review on the above referenced document. The EPA's concurrence with this document depends on the response of the enclosed comments. Please address the enclosed comments as appropriate.

Any questions please feel free to contact me at 404-562-8553.

Sincerely yours,

Wm. Turpin Ballard, RPM
Base Realignment and Closure Team
Federal Facilities Branch

Enclosure;

cc: Jordan English, TDEC, w/Enol.

Comments on the Draft Field Sampling Plan Addenda for OUs 2, 3, 4, and Screening Sites at the Defense Depot Memphis Tennessee (DDMT)

- Explain where scale is

- None of the figures has a scale on it. A scale would be useful in order to evaluate distances between samples and site features.
- Also has any effort been made to analyze the PAH content of the asphalt around the facility? It would make little sense to clean up soil based on PAH contamination when it is in such close proximity to streets and railroad tracks that will remain in place.

Specific Comments

- OUZ RI Site 27, Bidg.S-873 On the November, 1997, Environmental Condition of Property map, this site is shown as a CERFA Category 4 parcel. If characterization is incomplete, the ECP is actually category 6 or 7 since characterization of a release continues and no action has been taken yet.
- OU3 Golf Course Pond Samples SW25E and SD25 are so close to SD4 that I would expect similar results. Why are there no sediment samples proposed closer to the center of the pond?

Lake Danielson - same comment as above regarding samples in center of lake. Move SD26 north to deeper water or add a sample.

BRAC Parcel 20 - The BRAC Parcel Summary Reports (April, 1998, Section 20.6.5) recommend further evaluation of sub-parcel 20.5, yet no further evaluation is proposed for that property Why not?

OU4 - Bldg. 629 - The extent of surface soil contamination east of SS43 has not been determined. Soil borings SB57F, G, H, and I assessed the 3-10' interval, but no surface soil results were reported. Suggest adding 3 sample locations to the south, east, and north.

SCREENING SITES

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- Site 84, Bldg. 972 The text of the work plan indicates the sampling locations should be on Figure 3, whereas they are actually shown on Figure 2. Please correct.
- Site 51, Lake Danielson drainage ditch first, why is this site broken out separately from the lake itself. Given that, SSS1D does not appear to be close enough to the ditch, based on Figure 5.

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