



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 467

September 29, 1998

147543.WP.01

Wm. Turpin Ballard, RPM  
U.S. Environmental Protection Agency, Federal Facilities Branch  
61 Forsyth Street  
Atlanta, GA 30303-3104

Subject: Response to EPA's Review Comments on Draft Field Sampling Plan Addenda for  
OUs 2, 3, 4, and Screening Sites at DDMT

Dear Mr. Ballard:

We have received the United States Environmental Protection Agency, Region 4 (EPA) comments on the above-referenced document, and offer the following responses to each comment.

General Comments

1. A scale is on each figure, it is just not in a typical place due to the large quantity of information that is placed on each figure. The scale is found in the lower left hand corner, on the edge of the border, with vertical type. It typically looks like this: "MAP SCALE: 1' = 100'".
2. The PAH content of the asphalt around the facility has not been analyzed. This comment is a site management issue, and should be addressed by the entire BCT. We agree that cleanup may not be the best alternative.

Specific Comments

1. OU2, RI Site 27 - The issue of correct CERFA categories is not relevant to a field sampling plan. We can discuss the appropriate CERFA category for this building outside of the text of the Field Sampling Plan Addenda.
2. OU3, Golf Course Pond. We will attempt to take another surface water and sediment sample in the center of the pond. The surface water sample will not pose any problems, but we may encounter some problems with the sediment sample. The pond is lined with riprap, and it is not known if the riprap covers the entire pond bottom. In addition, a thick layer of leaves has been observed on the pond bottom. Both of these physical obstructions may prevent us from taking a sediment sample, but we will try.

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3. Lake Danielson. We will attempt to take another surface water and sediment sample in the center of the lake. The same physical limitations may prevent us from obtaining a sediment sample.
4. BRAC Parcel 20 – It isn't immediately obvious, but the recommendation will be covered in the sitewide evaluation for dieldrin. A risk assessment will be performed for the functional unit in which BRAC Parcel 20 resides, and it is during this assessment that the further evaluation will occur.
5. OU4 – Building 629 – The surface soil intervals at SB57F, SB57G, SB57H, and SB57I were analyzed, and no exceedances occurred. The figures included in the FSP addenda only plotted the constituents that exceeded criteria, therefore without the letter reports, it would not be possible to tell that other intervals or parameters had been analyzed. Because the letter reports had been previously issued as final, and because the FSP addenda were scoped to be brief, the existing figures were used.

Since no exceedances were found in the surface soils east of SS43, it can be stated that the extent of surface soil contamination east of SS43 has been assessed.

#### Screening Sites

1. Site 84, Building 972. This typographical error will be corrected in the text.
2. Site 51, Lake Danielson – In the 1986 the Army Environmental Hygiene Agency (AEHA) performed a study of Lake Danielson, but not the overflow ditch. Metals and DDT were found in the waters, sediments, and fish tissue samples. The Lake was placed off limits for fishing, and became an RI site. During 1994-1995, the overflow ditch was listed as a screening site, on the assumption that contaminants known to be in the lake would overflow into the ditch.

SS51D is not close enough to the ditch, and was not intended to be. The name assigned to it is misleading, and will be changed since the sample has not yet been taken. SS51D was intended to characterize the regional soil at SS14, and to confirm the previous results obtained at that location. Its number will be changed to avoid further confusion.

#### One Additional Comment on FSP Addenda

This comment relates to all addenda, and concerns the option of chemical preservation in the field with the use of Encore samplers.

CH2M HILL proposes to use the Encore sampler without chemical preservation in the field, which is one of the options with this sampling method. The samples will be preserved

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within the specified 48-hour period, but preservation will be accomplished at the fix-based laboratory. Therefore the EPA concerns about methanol and sodium bisulfite do not apply to this situation, since we are not preserving in the field.

Thank you for your timely review comments, and please feel free to call me if you would like to discuss any of our responses.

Sincerely,

Shawn Phillips  
BRAC Environmental Coordinator

MGM\Document3  
Enclosures

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