



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 54



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

File:
C.G. 190-300

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FEB 9 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C. Michael Rust, Colonel, USA
Commander
Defense Distribution Depot Memphis
2163 Airways Blvd.
Memphis, Tennessee 38114-5000

Subj: Draft Final Community Relations Plan
Defense Distribution Depot Memphis (DDMT); Tennessee
EPA I.D. No.: TN4 210 020 570

Dear Colonel Rust:

The Environmental Protection Agency (EPA) has completed its review of the document entitled Draft Final Community Relations Plan. Our comments are enclosed. EPA was unable to perform a complete review of the CRP, due to DDMT's failure to complete the required community relations interviews before preparing this document. The primary purpose of the CRP is to provide a plan for communicating and working with the public in order to assure that their concerns regarding the Site are addressed. Therefore, an adequate CRP cannot be designed until the interviews are completed and the community concerns are known.

The enclosed comments, together with the results of all community interviews, must be used to prepare a new draft CRP. In order to ensure that a well-planned, clearly documented community relations effort is implemented at DDMT in a timely manner, EPA anticipates receiving the draft CRP in this office no later than sixty (60) days from your receipt of this letter. This time frame is consistent with the time periods for primary document preparation which were agreed to by the Parties during Federal Facilities Agreement negotiations. If you have questions or concerns regarding the above issues or 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: Christine Kartman, DDMT
Denise Cooper, DDMT
Bill Forrester, TDEC
Jordan English, TDEC

TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL RI FOLLOW-ON STUDY COMMUNITY RELATIONS PLAN
 DEFENSE DISTRIBUTION MEMPHIS TENNESSEE (DDMT)
 MEMPHIS, TENNESSEE

GENERAL COMMENTS:

1. The Community Relations Plan (CRP) must not be linked to a specific portion of the response action process (i.e. the "RI follow-on study"). Rather, it must present a comprehensive plan for addressing all community issues and concerns which arise throughout the entire response action process, including all RI/FS and RD/RA processes. The document must simply be titled Community Relations Plan, and the contents expanded accordingly.

2. The primary purpose of the CRP is to address the community's issues and concerns. It is therefore impossible to prepare an adequate CRP until the community is appropriately surveyed and interviewed. To quote Specific Comment 11. from EPA's review of the December 1992 version of the CRP:

"In addition to being required by 40 CFR Section 300.430(c)(2)(i), these interviews must form the basis for much of the CRP, particularly those sections which describe the community's concerns and the ways in which DDRC will address those concerns. Community interviews must be completed and the results used to reformulate the CRP. A proper cross-section for information-gathering purposes should include at least 15-20 citizens in the immediate vicinity of the facility. Public officials alone should not be relied upon to voice community concerns."

Additional interviews must also be conducted on a representative percentage of the Memphis population (i.e. both citizens and public officials) as a whole. The concerns expressed by interviewees, as well as any concerns communicated by the public via other means (e.g. public meetings/information sessions, news coverage, meetings with public officials, etc.) must then be adequately conveyed and addressed in the CRP. Until this information is included in the document, it does not meet the requirements of a CRP and hence cannot be reviewed as such. The following specific comments are provided in order to assist DDMT in further improving the content and accuracy of the draft CRP to be submitted upon collection and incorporation of the above required information.

3. Is the correct title of the facility currently Defense Distribution Depot Memphis (DDMT)? Please correct as needed throughout the document.

SPECIFIC COMMENTS:

1. Pages 1 through 2, Section 1.0:

A. See General Comment 1.

B. "The community will be provided with accurate and timely information which will enable interested persons to comment on, and provide input to, decisions to the response actions." In order to facilitate the accomplishment of this goal, a mailing list must be established and included as a part of this CRP. Interested persons can then be added to this list as needed or requested.

C. An Administrative Record (AR) must be maintained at a least one Information Repository. This should be clearly stated, and the location of the AR provided, in the CRP.

D. Interviews with local private citizens must be conducted. A bullet indicating that this task has been successfully completed must be added to the list presented here.

E. The text "RI/FS Report" must either be underlined or enclosed in brackets, indicating that an exact document title is being quoted. Please see Specific Comment 1.C. submitted by EPA to DDMT in its review of the Draft Final RI Follow-on Study Work Plan for further clarification. One goal of the CRP must be to clarify to the public what has, and has not, been completed to date.

2. Page 4, Section 2.1:

A. The definition of an Operable Unit (OU) provided here is incorrect. The text seems to be describing an Interim Remedial Action (IRA). An IRA is taken when a threat identified for a given OU must be addressed prior to completing the full, or final, remedial action for that OU. Please refer to the Federal Facilities Agreement (FFA) and the NCP for an accurate definition of an OU and revise as needed.

B. The current OU descriptions list the contaminants detected. The descriptions should be expanded to include a brief summary of the levels of contamination detected as well.

3. Pages 11 through 12, Section 2.2:

A. DDMT is the Party responsible for completing all tasks associated with the response action process. Please delete all references to contractors both here and throughout the text.

B. In order to improve readability, please place the events discussed in this subsection in chronological order.

C. The term "Interim Remedial Measure" is incorrect. Please revise as needed.

4. Page 12, Section 2.3:

"It is documented that some areas of the Memphis Sand Aquifer are

directly overlain by the fluvial aquifer." Further clarification and documentation must be provided regarding this statement. Are any such areas known or believed to exist on or near DDMT.

5. Page 13, Section 2.5:

Please update this section as needed to include a brief summary of currently planned schedules and activities. Also delete the reference to contractors.

6. Page 15, Table 6, Item 3.:

A. Item 3 - Date to Be Terminated:

"To continue until groundwater contamination problem is solved." Although groundwater cleanup is likely to take longer than the cleanup of other environmental media, this sentence should be revised to read "...until all contamination is adequately addressed."

B. Item 9 - Composition:

Regarding private citizen membership on the TRC, the CRP should specify how many private citizens will serve on the TRC, how these citizens will be selected and how they will be informed of the TRC and associated activities.

C. General Comment:

Pursuant to recent conversations with DDMT staff, it is EPA's understanding that DDMT may propose to establish a second review group aimed at promoting more diverse, equitable community involvement. The current guidance (e.g. Interim Report of The Federal Facilities Environmental Restoration Dialogue Committee (2/93), Interim Guidance for Implementing Restoration Advisory Boards (11/93, currently under revision by a joint EPA-DOD committee)) for establishing such groups (e.g. Site Specific Advisory Boards, Restoration Advisory Boards) strongly encourages the facility to expand or modify the existing TRC to address these expanded community concerns, rather than forming a second such group. EPA therefore strongly encourages DDMT to carefully consider and document its reasons for establishing two separate review groups. Specifically, what would be the advantages and disadvantages of this approach? Also, if DDMT feels that two such groups are necessary, the existence of each group must be clearly recognized and agreed to by the other. The working relationship between these groups must also be clearly defined. Good communication and coordination between these groups will ensure that the goals of each group enhance, rather than interfere with, the goals of the other.

7. Pages 16 through 18, Section 6.0:

This general information section should probably be placed earlier in the document (e.g. after Section 2.0), prior to the discussions of specific work groups or tasks associated with the community relations process.

8. Page 17, Paragraph 3:

"Once the extent of the contamination is known and the risk to

human health and the environment is defined, the FS can begin." This statement is incorrect and must be revised. The FS includes all tasks, including data collection and tests, which must be performed to facilitate the remedy selection process. Some of these tasks can begin as soon as any information on the nature and extent of contamination at the Site is known. By initiating the FS as soon as possible, and overlapping the RI and FS processes, the remedy selection can be made more effectively and efficiently.

9. Page 18, Paragraph 3:

"The public is given a minimum of 30 days to express their opinion on EPA's preferred alternative...". DDMT, as the lead agency, proposes and selects the preferred alternative. EPA and TDEC, as regulatory oversight agencies, concur with this remedy selection upon signature of the Record of Decision. Please revise the text as needed.

10. Page 19, Section 7.2:

"In general, there appears little concern from the community regarding the contamination at DDRC." The CRP does not contain enough information or documentation to support this statement. As mentioned in General Comment 2, the CRP must present and discuss the completed results of the community interviews, as well as any other information on public opinion obtained through other means. On June 4, 1993, EPA received a copy of a letter from a concerned citizen (Larry Smith) to DDMT. In it, Mr. Smith expressed concerns about potential groundwater contamination and DDMT's "[tendency] to downplay the contamination on the Defense Depot." He requested that DDMT improve the methods used to convey information to the community, conduct a health survey, provide the public with information on the health effects of hazardous materials found at DDMT, and conduct interviews with retired employees. Letters such as this should be regarded as a valuable source of information and used to design a Community Relations Plan which more effectively responds to community concerns, thereby preventing these concerns from escalating needlessly.

11. Page 20, Paragraph 1:

"...since no community interviews have yet been conducted, it is not known if the local citizens have a complete understanding of the contamination problem." See previous comments regarding the need for community interview results in designing an effective Community Relations Plan.

12. Page 20, Paragraph 3:

"...without disrupting the community confidence that the site poses no new threat or immediate hazard." Given that the community has not yet been interviewed to determine its concerns, this statement is premature and should be deleted.

13. Page 21:

A. Item 2:

What means and format will be used to convey this information?

B. Item 4:

The suggested time frames for preparation of fact sheets are good. However, please specify that such fact sheets will be prepared for each OU and on a regular basis. Fact sheets aimed at keeping the public informed of ongoing community relations activities (e.g. TRC and other group meetings, lead agency response to community concerns, etc.) should also be prepared and distributed.

C. Item 4:

A copy of each fact sheet (as well as any other handouts prepared for public information purposes) should be provided to each person on the mailing list. All handouts should be made available to the general public as well.

14. Pages 22 through 26, Section 9.0:

This section should also describe the community relations activities (e.g. public notices, comment periods, public meetings) required for removal actions.

15. Page 22, Section 9.0, Item 3:

If the information repository and administrative record file have already been established, please provide this information in the revised CRP.

16. Page 23, Paragraph 1:

"...information for which the EPA (with DDRC input) expects to base its selection of a response action." DDMT, as the lead agency, makes the final remedy selection, with EPA and TDEC concurrence.

17. Page 25, Item 10:

"Once the ROD has been signed for the site, this CRP must be revised to outline community relations activities appropriate for the RD/RA phase." The current CRP must be revised to include the general community relations requirements for the RD/RA process.

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