



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 63



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File:
C.G. 541. 460. 000

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June 6, 1994

Mr. Frank Novitzki
DDMT-DE
Defense Distribution Depot, Memphis
2163 Airways Blvd.
Memphis TN 39114-5211

Re: Review of materials

Dear Mr. Novitzki:

Thank you for the opportunity to view the draft documents regarding the upcoming Depot corrective actions. I reviewed, in a very general way, the following documents:

1. Health and Safety Plan Dec. 1993
2. USAC- Technical Report GL-94-8, March 1994
3. Generic Quality Assurance Project Plan
4. Generic Remedial Investigation, Feasibility Study Work Plan, DEC 1993
5. Operable Unit # 1 Field Sample Plan
6. Site Management Plan, Sampling Plan April 1994

My comments are primarily focused on the areas listed for no further action, (NFA) in document # 4. Specifically page 2-15 items 54, the east stormwater channel, item 55 the north storm water channel, and item 56 the west channel. Information was taken from the 1990 Law Engineering study for these sites. I would propose that additional soil samples be taken at these sites and adjacent to the channels, both from the surface and shallow borings. On page 3-19 it was explained that surface water samples were taken from the large ditch on the western side of the Depot but no soil samples were taken due to the fact that the ditch was concrete lined. This ditch has only recently been concrete lined. It was an unprotected earthen ditch for the majority of the Depot's existence. Soil samples should be taken

along the sides of the ditch and in the nearby community. Additionally, the ditch which drains to the south is still a partial earthen ditch.

I would propose that an operable unit be created that would encompass the three major drain ways which leave the site. Two of these drain ways flow directly through densely populated areas. In fact the southern drain way, from the lake area, goes through the middle of an apartment complex.

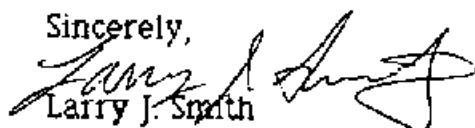
I would further urge that new samples be taken from the area of sample site * 83 which is the paint disposal area listed on page 3-25 of the Site Management Plan, Screening Plan April 1994.

I would also urge that site 84 be re-investigated. I could not find a site history in the material I reviewed. Additionally, I believe sites 35, 36, 37, 38, 39, all could drain into the western drain way. This should raise the level of concern for past contamination.

Due to the lack of information regarding the western drain way further investigations should be carried out. Additionally, an OU* should be created for the communities adjacent to the drain ways.

If you have any questions, please call me at 901-452-6997

Sincerely,


Larry J. Smith

cc Ms. Allison Drew EPA Region IV

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