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Defense Distribution Depot Memphis, Tennessee

# Site Management Plan



September 1994

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1.0.1 References. A complete list of references is found in Appendix A.

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1.1 Background Information.

1.1.1 Regulatory Background. The requirement for the Site Management Plan (SMP) is identified in the Federal Facilities Agreement (FFA) signed by the Environmental Protection Agency (EPA), the State of Tennessee Department of Environment and Conservation (TDEC), and the Defense Distribution Depot Memphis Tennessee (DDMT). The FFA was entered into based on the requirement for an interagency agreement identified in the Superfund Amendments and Reauthorization Act (SARA), Section 120 (e) (2). In accordance with Section XXI (Schedules for Document Submittal) of the FFA, the FY94 SMP is attached to the FFA as Appendix C. Subsequent annual updates to the SMP shall be submitted under separate cover. Also in accordance with the FFA, the previous SMP shall remain in effect until the updated SMP is approved by all Parties.

1.1.2 Purpose. The purpose of this SMP is to outline the strategy for achieving the objectives of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigation and remediation program. This program evaluates the potential for past releases of hazardous wastes and/or constituents to the environment from potential sites of contamination at this facility and implements remedial actions when necessary. The intent of the plan is to provide the following:

(a) Actions deemed necessary to mitigate any immediate threat to public health or environmental quality.

(b) A list of Operable Units (OUs) subject to the requirements of the FFA.

(c) Prioritization and rationale for the OUs at DDMT.

(d) Activities and schedules for work planned during the current year and two subsequent years, including the submittal schedule for primary and secondary documents.

(e) Anticipated work projections for subsequent years.

1.1.3 Regular Updates. In accordance with the FFA, this plan will be updated by 1 February each year. This is the first submission of the SMP.

1.2 Site History. The installation presently known as DDMT was constructed in 1941. The facility was activated on January 26, 1942 as the Memphis General Depot, operating under the U.S. Army, the owner of the site. The Army operated the facility until 1962. In 1962 the Defense Logistics Agency (DLA) (then called the Defense Supply Agency) became the operator of the facility under permit from the Department of the Army and named it Defense Depot Memphis, Tennessee. In 1991, Defense Distribution Region Central (DDRC) was established to provide operation direction to several DLA distribution depots in the Central United States. In 1993, DDRC was disestablished and the site was named Defense Distribution Depot Memphis, Tennessee (DDMT). DDMT is a subordinate command under the Defense Distribution Region East (DDRE) located in New Cumberland, Pennsylvania.

1.3 Installation Restoration Program. The Department of Defense (DoD) developed the Installation Restoration Program (IRP) to evaluate and remediate the effects of past hazardous waste management and disposal practices at its facilities and to comply with the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended.

1.4 Regulatory Background.

1.4.1 RCRA Part B Permit and Designation as a National Priority List Site. DDMT was issued a RCRA Part B permit (No. TN4 210 020 570) by the U.S. EPA, Region IV, and the Tennessee Department of Environment and Conservation (TDEC) on 28 September 1990. Subsequently, in accordance with Section 120(d)(2) of the Comprehensive Environmental Response and

Liability Act, 42 U.S.C. 9620(d)(2), EPA prepared a final Hazard Ranking System (HRS) Scoring Package for DDMT. Based on the final HRS score of 58.06, EPA added DDMT to the National Priorities List (NPL) by publication in the Federal Register, 199 Federal Register 47180, on October 14, 1992. The SMP will outline the strategy and schedule for achieving the objectives of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigation and remediation program that also meets the requirements of DDMT's RCRA Part B permit.

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1.4.2 Federal Facility Agreement. DDMT has entered into a Federal Facility Agreement (FFA) between the Defense Logistics Agency, the EPA and TDEC. The agreement establishes a procedural framework and schedule for developing, implementing, and monitoring appropriate response actions at DDMT in accordance with existing regulations and achieving RCRA/CERCLA integration. As agreed to by the Parties, sites at DDMT have been grouped into four operable units and a number of screening sites which must be addressed under the CERCLA process. The Parties further agreed to designate additional Operable Units as appropriate to facilitate and expedite the response action process. As a result of DDMT's status as an NPL site, it was agreed that the investigation of all applicable sites would proceed under the CERCLA process for remediation (remedial investigation, feasibility study, proposed plan, record of decision, remedial design and remedial action).

1.4.3 Lead Agency/ Support Agencies. As established in the National Contingency Plan (40 CFR Part 300.120), the Department of Defense (DoD) is the lead agency at NPL sites involving Federal Facilities. Accordingly, EPA and TDEC have been identified as support agencies in this process.

1.5 Previous Studies. In conformance with DLA environmental programs, a number of technical studies have been conducted at DDMT. A summary of the results of the more pertinent studies is provided in Appendix B of the FFA.

1.6 Overall Management Approach. This SMP provides a management plan and tracking program for potential contamination sites identified at DDMT. The SMP describes each operable unit by site and Solid Waste Management Unit (SWMU) number (reference 11), and provides a brief discussion

concerning the results of previous studies. In addition, the SMP discusses and identifies the management and deliverables of those OUs undergoing RI/FS and RD/RA activities for the current and subsequent two fiscal years (FY94 - FY96) such as field work, data reports, and workplans. This SMP also projects the anticipated deliverables due during subsequent projected years (i.e., 1997, 1998, and 1999). The projected scheduling of the program tasks is shown through the signing of the Record of Decision and the published public notice. Detailed within this SMP are the program events to take place during FY94, FY95, and FY96, as well as the enforceable due dates for draft primary documents and target dates for secondary program documents.

1.6.1 It is the goal of DDMT to tailor the CERCLA Remedial Investigation/ Feasibility Study (RI/FS) process to allow prioritization of sites according to potential threat to human health and the environment. The process will focus on source identification, with delineation of soil/sediment, groundwater, and surface water contamination. Data will be continually assessed and sites evaluated to determine if contamination is present, if it presents a threat, if it has been delineated, and, finally, what further action is needed (e.g., delineation, Interim Remedial Measure, or evaluation of remedial alternatives). If initial data evaluation shows any contaminated media to be an immediate threat to human health or the environment, response actions (e.g., interim actions, removal actions) may be performed to mitigate this threat. If groundwater or surface water contamination is not judged to be an immediate threat, delineation may be performed on a larger scale by viewing local aquifer and surface water systems as an individual operable unit which may be impacted by several sites simultaneously.

1.6.2 Decisions concerning data assessment and actions to be taken will be made during Remedial Project Managers (RPM) meetings, which will include representatives from EPA, TDEC, and DDMT. These decisions will be documented in meeting summaries of the RPM meetings and finalized via formal, follow-up correspondence between the RPMs.

**I.6.3** Through the use of the above approaches, the RI/FS process can be responsive to individual OU characteristics and technical requirements and will minimize delays between field actions.

#### 1.7 Summary.

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1.7.1 DDMT has conducted several investigative studies and limited response activities on various areas of the installation to date. Previous investigative efforts have been conducted in an effort to provide adequate characterization of past releases, site identification, and identification of some potential contaminants of concern and potential pathways for human exposure to contamination. Future investigative plans involve filling data gaps to further define the extent of contamination, transport of contaminants, identification of all contaminants of concern, and characterization of the potential exposure pathways in all OUs.

1.7.2 A serious source of contamination that could result in widespread public exposure to contaminants from DDMT is presently the Dunn Field area of the installation (OU 1). Major efforts will be undertaken in the next phase of field work to fully define the extent of the groundwater plume, identify sources of contamination within Dunn Field, and characterize the thickness and continuity of the confining unit both on and off the installation. This additional investigative work has the highest priority over other OUs.

1.7.3 An Interim Remedial Action is being pursued to stop the off-site migration of the known groundwater contamination. A Focused Feasibility Study will be prepared for this action. The next phases of this project include the preparation of a proposed plan, a period of public review and comment, and then an interim Record of Decision (ROD). Upon completion of the interim ROD, DDMT will proceed with design and construction of the preferred alternative.

# 2.0 OPERABLE UNIT GROUPINGS AND DESCRIPTION OF CURRENT CONDITIONS.

2.0.1 All sites have been clustered into one of the following: four (4) OUS, a list of screening sites, and a list of no further action (NFA) sites. The scheduled work at these OUS is prioritized based on potential threat, schedule optimization, and task management. The OUs and relative prioritization were formulated at the January 1993 RPM meeting held at DDMT. General criteria used to generate the OUs are as follows:

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- a. Geographic proximity of sites
- b. Similar contaminants of concern previously identified.
- c. Similar investigation methods.
- d. Scope and complexity of investigation.
- e. Results of previous site studies.
- f. Potential for off-site migration and exposure.
- g. Relative threat to the City of Memphis drinking water supply.
- h. Suspected mobility of contaminants.

2.0.2 The OUs may be re-defined as more data are collected and evaluated. Upon completion of analyses, screening sites will be either upgraded to determine extent of contamination or placed in the proposed NFA list for EPA/TDEC concurrence. The enforceable schedule for an existing OU into which the site is incorporated will not change unless mutually agreed to by the Parties. Upon establishment of a new OU, the OU schedule will become enforceable and will be added to the SMP.

2.0.3 Figure 2.1 shows the general geographic locations of the four OUs proposed for DDMT. A detailed map showing the locations of all sites will be provided in the Generic RI/FS Workplan for DDMT.

2.1. Definition of the Four Operable Units. Representatives of DDMT, U.S. EPA, and TDEC agreed during a technical meeting held January 1993 on four OUs to be addressed during future investigations. These representatives further agreed to designate additional OUs as appropriate to facilitate the response action process. The four OUs are listed below and are located within DDMT as shown in Figure 2.1.

- OU-1: Dunn Field
- OU-2: Southwest Quadrant, Main Installation
- OU-3: Southeast Watershed and Golf Course
- OU-4: North Central Area, Main Installation

A brief description of each operable unit is provided in this section, to include a qualitative assessment of past sampling activities. Detailed site descriptions and quantitative sampling results are provided in the Operable Unit (OU) specific Field Sampling Plans (FSPs). Tables 2.1 through 2.4 show

the RI/FS sites, screening sites, RFA identified No Further Action (NFA) sites, and proposed NFA sites within each OU.

2.2 Nature and Extent of Contamination. The following section is intended to give a general, qualitative overview of the known nature and extent of contamination in each OU. Most of the information presented in this section has been derived from 50 surface soil samples and 24 subsurface samples collected in calendar year 1990. All samples (groundwater, soil [surface and subsurface], surface water, and sediment) were analyzed for volatile organics, semi-volatiles, pesticides/PCBs, total metals, and mercury. Detailed discussions concerning previous sampling results are presented in the Generic RI/FS Workplan and the OU specific Field Sampling Plans.

2.2.1 OU-1, Dunn Field. Dunn Field is the only area on DDMT where burial of waste is known to have occurred. A DDMT map dated 1956 shows 21 burial sites at Dunn Field. Two other sites include a burn pit and a pesticide storage area.

Groundwater monitoring wells were installed into the uppermost (fluvial) aquifer in this area by the USAEHA in 1982 and by the Law Study. Groundwater monitoring data collected during the Law Study shows levels of volatile organic compounds and metals which suggest a release has occurred from this area. The source of the release has not yet been determined.

Figure 2-1 Operable Unit Locations



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### Table 2.1

#### Operable Unit I - Dunn Field

STTE	-	
Number	Description	Conners
! .		
<u> </u>	Mounard & Lewisite Training Sets (6) Bar(a) Site (1955)	
<u> </u>	Aromonia Elychoxide (7 lbs) & Accol Acid (1 gal) Burst (1933)	
┝─┦→	Mitted Chemical Burial Site A (OT Dihydrochloride) (1955)	
┝╺╹╶┥	POL Burial Size (13 - 55 gal drums; oil, gream, paini), date anit.	
	(32 - 55 gal drums: oil, grease, thinner) (1955)	
	Methyl Bromide Banal Size A () cubic feet) (1913)	
<u></u>	40.037 units distincts (sys) Buriel Site (1915)	
- 7	Nitrie Acid Borial Site (1700 hertlas) (1954)	
╺╴╺╸╴┼	Methyl Bromide Burial Site B (3.768 - 1 gal case) (1954)	
	Ashes and Metal Burial Sim (huming pit refuse) (1935)	
	Solid Wate Surial Sim (at MW-10) (ment, glass, trash, etc)	
	Trickloroucetic Acid Borial Sile (1,433 - 1 at bodies) (1965)	
	Solfuric and Hydrochloric Acid Burial (grantery 7) (1967)	
<u> </u>	Mixed Chemical Burial Site 8 (mixed chemicals, acid, 900 lbs	
	desergent, 7,000 fbs Alaminum Sulface, 200 (be sodium)	
	Menicipal Warm Bariel Site (nr MW 12) (food, paper products)	
<u> </u>	Sodiern Berial Size (sodiern - 1968)	
	(Sodium Phosphane, 1968)	
	(14 Burial Fits containing sodium phosphare, sodium, and,	
<del></del>	medical supplies, chlorinsted time, 1970)	
16 _	Unknown Acid Burial Sine (1969)	
ł	(Acid, Date Unknown)	
17	Mixed Chemical Burial Size C (1969)	
	Former Barn Size (1946)	
- 85	Old Pistol Range Bldg, 1184/ Temp. Pesticide Storage	
. 18	Place Crash Residue (Duon Field)	
19	Former Tear Gas Caninter Born Size (Denn Field)	
20	Probable Archalt Burial Site (Duon Field)	
21	XXCC-3 Burial Site (Dunn Field)	
21	Hardware Burial Site (Nutt and Bolite) (Thunn Field)	Proposed Screeting Site
23	Construction Debris and Food Runial Site (Dune Field)	
50	Dana Field Narobeast Ouedrant Draineas Disch	Dra per KCAA Jennij
64	Pistol Range Impact Area/ Bullet Stop	
61	Buried Orsin Ploy (NW Onedrast of Date Field)	Browned Screening Side
62	Bauxies Storage (NE Oundrant of Dunn Field)	Descend NCA Store Commences
63	Fluorzpar Storage (SE Quadrant of Dunn Field)	Property INTA SIE: Storage of Non-Mazardons commodity
64	Bazaita Storage (SW Quadrant of Dana Field) (1947-77)	Proposed NEA Site: Storage of Non-Instandous commutity
56	Food Supplies (Duon Field)	Property ME A Site: Storage of Non-hazardous commodity
		FIODOLED MTA SIZ - No hezardone miberatere e size



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#### Table 2.2

#### **Operable Unit 2 - Southwest Quadrant**

Site No.	Description	Comments
27	Former Recoup Area	
29	Former Underground Waste Oil Storage Tank	
30	Paint Spray Booths (2 of 3 total; Bldgs, 770 and 1086)	NFA per RCRA Permit
31	Former Paint Spray Booth (Bldg, 1087)	Proposed Screening Site
32	Sandblasting Waste Accumulation Area	
33	Sandblasting Waste Drum Storage Area (Metal Shed S. of Bidg. 1088)	NFA por RCRA Permit Proposed Screening Site
34	Building 770 Underground Oil Storage Tanks	
40	Safety Kleen Units - 5 of 9 total (All located in Bidg. 770)	NFA per RCRA Permit
41	Satellite Drum Accumulation Areas - 2 of 4 total (vicinity of Bldg. 770)	NFA per RCRA Permit
47	Former Contaminated Soil Drum Storage Area (Concrete igloo located 300 feet west of Bldg. 689; drums removed 1988)	NFA per RCRA Permit
82	Flammables (Bidg. 783)	Proposed Screening Site
84	Flammables, solvents waste oil, etc. (Bldg. 972)	Proposed Screening Site
87	DDT, banned pesticides (Bidg. 1084)	
88	POL (Bldg. 1085)	
89	Acids (Bldg. 1089)	

Revised 5 OCT 94: Even though Site 33 is NFA it is proposed as a screening site to reconfirm the appropriate status of the site.

### Table 2.3

### Operable Unit 3 - Southeast Quadrant

Site No.	Description	Comments
25	Golf Course Pand	
52	Golf Course Pond Outlet Ditch	
28	Lake Danielson	
51	Lake Danielson Outlet Ditch	
58	Pesticides, herbicides (PAD 267)	
59	Pesticides, cleaners (Bldg, 273)	
48	Former PCB Transformer Storage Area	
30	Paint Spray Booths -of 3 total (Bldg. 260)	NFA per RCRA Permit
40	Safety Kleen Units - 4 of 9 total units(Bldgs. 253, 469, 490, & 689)	NFA per RCRA Permit
41	Satellite Drum Accumulation Areas - 2 of 4 total areas (Bldgs. 469.6.260)	NFA per RCRA Permit
49	Medical Waste Storage Area	NFA per RCRA Permit
65	XXCC-3 (Bidg. 249)	Proposed Screening Site
68	POL (Bidg. 253)	Proposed Screening Site
67	MOGAS (Bidg. 257)	Proposed Screening Site
68	POL (Bidg, 263) (20x40 feet)	Proposed Screening Site
69	2,4-D, M2A1 & M4 flame-thrower liquid fuels (surface	Proposed Screening Site
	applied)	
73	2.4 Dichlorophenoxyacetic Acid (surface applied to all	Proposed Screening Site
1 ·	grassed areas)	
75	Unknown Wastes near Bidg. 689	Proposed Screening Site
76	Unknown Wastes near Bidg. 690	Proposed Screening Site
77	Unknown Wastes near Bidgs, 689 & 690	Proposed Screening Site
78	Alcohol, Acetone, Toluene, Naphtha, & Hydrofluoric Acid Spill	Proposed Screening Site

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#### Table 2.4

### **Operable Unit 4 - North Area of Main Installation**

Site No.	Description	Comments
57	Building 629 Spill Area	
28	Recoup Area Building	Proposed Screening Site
35	DRMO Building T-308 Hazardous Waste Storage	NFA per RCRA Permit
		Proposed Screening Site:
36	DRMO Hazardous Waste Concrete Storage Pad	TDEC LEAD
37	DRMO Hazardous Waste Gravel Storage Pad	TDEC LEAD
38	DRMO Damaged/Empty Hazardous Materials Drums	TDEC LEAD
	Storage Area	
39	DRMO Damaged/Empty Lubricant Container Area	TDEC LEAD
41	Satellite Drum Accumulation Area (1 of 5 Total - Bldg. 210	NFA per RCRA Permit
42	Former PCP Dipvat Area	Proposed Screening Site
43	Former Underground PCP Tank Area	Proposed Screening Site
44	Former Waste Water Treatment Unit Area	NFA per RCRA Permit
45	Former Contaminated Soil Staging Area	NFA per RCRA Permit
46	Former PCP Pallet Drying Area	Proposed Screening Site
53	X-25 Flammable Solvents Storage Area (Near. Bidg. 925)	NFA per RCRA Permit
54	Main Installation - DRMO East Stormwater Runoff Canal	NFA per RCRA Permit
		Proposed Screening Site
55	Main Installation - DRMO North Stormwater Runoff Area	NFA per RCRA Permit
د د		Proposed Screening Sile
56	Main Installation - West Stormwater Drainage Canal	NFA per RCRA Permit
		Proposed Screening Site
70	POL, various chemicals (RR tracks 1,2,3,4,5,6) - Leaks	Proposed Screening Site
71	Herbicide (All RR tracks) (used to clear tracks)	Proposed Screening Site
72	Waste Oil (PDO yard) (surf. applied. for dust control)	Proposed Screening Site
73	2,4 Dichlorophenoxyacetic Acid (All grassed areas) (applied	Proposed Screening Site
	to surface)	
74	Flammables, toxics (West End - Bidg. 319)	Proposed Screening Site
79	Fuels, misc, liquids, wood, paper (Vicinity S702)	Proposed Screening Site
80	Fuel & cleaners dispensing (Bldg. 720)	Proposed Screening Site
81	Fuel oil (Bldg. 765)	Proposed Screening Site
83	POL (isoctane, toluene, acetone, MEK, naphtha) Areas X-13,15,25	Proposed Screening Site

Revised 5 OCT 94

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The burn pit was investigated with one surface soil sample during the Law Study. The results of this analysis revealed primarily polynuclear aromatic hydrocarbon (PAH) contamination in the soil. The only pesticide detected was alpha-chlordane. PAHs are thermally stable and are often artifacts left as residue when oil, gas, or organic materials are burned.

Building 1184 had previously been used in conjunction with the pistol range and in more recent years to store pesticides and herbicides. A soil sample taken during the Law Study near this building showed pesticides (DDT, DDE, and dieldrin) at elevated levels. Table 2.5 provides a summary of available data for OU 1 sites including potential contaminants for each site. Each burial site within Dunn Field will be described in detail in the OU-1 FSP.

2.2.2 OU-2, Southwest Quadrant of Main Installation. OU-2 is characterized as an area where maintenance and repair activities have taken place. OU-2 includes three key areas which are the former hazardous materials recoupment area; the sandblasting, painting areas, and associated buildings, and the equipment maintenance/repair facility.

During the Law Study soil samples were taken around the vicinity of Bldg. S- 873, the former hazardous materials recoupment area. Prior remediation for pesticide contamination resulted in the removal and backfill of surface soil in this area. Soil samples taken after the remediation did not contain pesticides at detectable levels. A groundwater monitoring well installed in this area during the Law Study revealed slightly elevated concentrations of metals. The sandblasting and painting area at Building 1088 was sampled during the Law Study, with surface soil samples collected on all sides of this building and near adjacent Bldgs. 1087 and 1089. PAHs, pesticides, and metals were detected. Subsurface soil samples in this vicinity did not exhibit contamination. Monitoring wells installed into the uppermost aquifer in this area exhibited trichloroethene and tetrachloroethene. A potential source for this contamination has not been determined. Nearby Bldgs. 1084 and 1085 require further investigation because pesticides and petroleum products were used at these areas.

Surface soil samples taken during the Law Study from the area surrounding Bldg. 770, the equipment maintenance/repair shop, indicated PAH contamination, indicative of oils or heavy fuel residuals. Low levels of chlorinated solvents were also found in this area. The extent of the PAH

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contamination has not been determined. Table 2.6 provides a summary of available data for OU-2 sites including potential contaminants for each site.

2.2.3 OU-3, Southeast Watershed. OU-3 includes the Golf Course Pond, Lake Danielson, the former transformer storage area, Pad 267, and the former pesticide storage area. The Golf Course Pond and Lake Danielson lie on the lower reaches of the watershed draining the central and southeast portions of DDMT. Past studies of Lake Danielson and the Golf Course Pond have shown that the surface water, sediment, and fish in these water bodies exhibit low levels of pesticides and PCBs. These water bodies receive surface runoff from the surrounding industrial and recreational areas with three possible sources of contamination - the former transformer storage area; Pad 267 where pesticides and herbicides were stored; and Bldg. T-273 where pesticides and cleaners were handled.

Sediment samples taken at different depths from the Golf Course Pond and Lake Danielson indicated low levels of PAHs in only one Lake Danielson sample. Levels of PAHs were higher in samples from the Golf Course Pond. Surface soils from the Golf Course grounds during the Law Study revealed pesticides and low levels of PAHs.

Surface water samples collected from Lake Danielson during the Law Study showed copper and low levels of the pesticide DDE. No significant contamination was found at the lake inlet. Samples collected from a drainage ditch in the southwest corner of the golf course showed DDT. Two surface water samples collected from the Golf Course Pond showed copper. Samples collected from a drainage ditch along the southern boundary of DDMT which receives surface runoff from the Pond and the Golf Course showed low levels of DDE and DDT.

Outflows from Lake Danielson and the Golf Course Pond pass southward off-site to Nonconnah Creek. Fishing and swimming restrictions are currently in place for Lake Danielson and the Golf Course Pond. Table 2.7 provides a summary of available data for OU-3 sites including potential contaminants for each site.

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#### Table 2.5

		SWMU	Potential Comaminants
STTE	·	NUMBER _	(based on site description/ records)
NUMBER	DESCRIPTION		
		1 1	Thiodystycol, mostard
L	Mantard & Lewister Training Sets (6) Berral Size (1933)	2	Possibly metals
1	Ammonia Hydroxide (7 lbs) & Acetic Acid (1 gal) Surtil (1933)	+	None expected to be harardows
3	Mind Chemical Burni Site A (OT Disydrochioride) (1995)		VOQ metals
	POL Burbi Sine (13 - 55 gal drums, oil, grease, paint), date and	┿╼╼╼╧	VOQ metals
·	(32 - 55 (a) dry out; oil, grease, thirder) (1955)	+	Method bromide, VOCI
5	Methyl Bromide Burial Site A (3 cubic (eet) (1955)	+	None expected to be hazardott
6	40.037 units offenent (eye) Burial Site (1955)	┿───┤	Matth
	Nigrie Acid Surial Sile (1700 bottles) (1954)		Marine bromide VOCt
<u>├</u>	Merbyi Bromialo Burial Sile B (3,765 - 1 gel cans) (1954)		Metayl Golden at 1000
<u> </u>	Ashes and Metal Burial Site (burning pit refuse) (1955)	;	
10	Solid Watts Buriel Site (nr MW-10) (metal, glass, trash, str)	_ <u></u>	WOO
	Trichlomacetic Acid Borial Site (1,433 - 1 oz bottleg) (1965)	<u>}_</u>	VOCI,meun
<u>├── ;</u> ;	Sulfort and Hydrochieric Acid Burbi (quantity ?) (1967)		
	Mined Chemical Burial Site B (mined chemicals, acid, 900 lbs		
<u>├──<u></u></u>	determent 7.000 lbs Aluminum Sulfate; 200 lbs rodium)		the second secon
	Municipal Weste Burgel Site (nr MW 12) (hod, pager grodure)	<u> </u>	None crperter to be Astrikota
	Section Revial Stee (andiam = 1968)	<u>_</u>	None capeties to be subrous
<u></u>	Bedin Berginster 1968		None expected to be manarales
	(Southin Principles and an about the sodium, at ki		None expected to be have dotted
	(16 Borger Fild Contenting Society pro-		<u> </u>
L	mencal supplies, cash intered man, correspondences		5 Metala
16			- Metals
	Acia, Date United Brend Star C (1969)		7 Possibly VOCL metal
17		2	PAHs, thiody ( heal, Pesit sies meus
24	Former Burn Site (1960)		- Pesticides
<b>P</b> <	OM Phuoi Range Bidg, 1184/ Jemp, Pespeciel Storage		

### Evaluation of Available Data - Operable Unit 1

Pump Test (September 1992): Groundwater sampled for VOCs,Semivolatiles,metals, perticides/PCBs, mustard, thiodyglycol. Only VOCs detect GW: Groundwater. Groundwater sampled for VOCs,Semivolatiles,metals,pesticides/PCBs. VOCs and metals only detected in all rounds of prev (1982, 1987, 1989, and 1990)

#### Table 2.6

### Evaluation of Available Data - Operable Unit 2

SITE		SWMU	Potential Contaminants (hased on site description/records)
NUMBER	DESCRIPTION		
		27	PAHs Pertirides/PCBs Metab
27	Former Recoup Area		Pesticides/PCBs, Metals
87	DDT, banned pesticides (Bidg. 1084)	<u> </u>	Pesticides/PCBs Metab
88	POL (Bidg. 1085)		Pesitides/PCBs Metab
89	Acids (Bidg. 1087)	79	Peutides/PCBs PAHs Metals
29	Former Underground Waste Oil Storage Tank (Nr. Bing 1080)	12	Meiata
32	Sandblasting Waste Accumulation Area (Nr. Bldgs 1087,1088)	1 14	PAHs PCBs Memis VOCs
34	Building 770 Underground Oil Storage Tanks (2 - 1,000 gal) ( Waste Oil)		

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2.2.4 OU-4, North Central Area. This OU is primarily characterized by the presence of the main hazardous materials storage building at DDMT. High levels of pesticides, PAHs, and VOCs were detected during previous sampling events during the Law Study and RFA. The geographical area of OU-4 contains Bldg. 737, the former PCP dip vat area, and building 629, which is the hazardous materials storage area. Table 2.8 provides a summary of available data for OU-4 sites including potential contaminants for each site.

2.2.5 Screening Sites. The screening sites have been identified in the RFA, the Law Study, and the DDMT RCRA Permit. The sites include areas such as storm water drainage ditches, fuel storage areas, known/ suspected spill areas, and areas where pesticides had been applied. Table 2.9 provides a summary of sites for which screening sampling is proposed, as well as a potential OU for each site. Table 2.9 provides a summary of available data for the proposed Screening Sites including potential contaminants for each site.

2.2.6 No Further Action Sites. Table 2.10 contains a summary of proposed NFA sites. A total of 23 sites are proposed for NFA due to one or more of the following reasons: no threat for releases due to past waste management activities; no observed contamination based on sampling results; prior removal/ remediation activities; no hazardous substances managed at site; and current operational/ structural features. A report justifying, for each site, the no further action status will be submitted for regulatory agency review and approval/concurrence.

3.0 OPERABLE UNIT SCHEDULING. The schedules of the OUs are based upon the issuance of draft primary and secondary document submittals. The schedule will be revised in accordance with the FFA. Schedules for each OU are included in Appendix B of this SMP.

#### Table 2.7

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### Evaluation of Available Data - Operable Unit 3

SITE	DESCRIPTION	SWMU NUMBER	Porential Contaminants (based on site description/ records)
	Galf Course Pand	25	Pesticides/PCBs Metals, PAHs
26	Lain Danieison	26	Pestelder/PCBs Meuls,PAHs
58	Pestelides, berbindes (PAD 267)		Pesticides/PCBs
59	Pesticidas, cicanars (Bidg. 273)	<u> </u>	Pesitides PAHsmenh
48	Former PCB Transformer Storage Area (New Cafeteria)	48	I FUEL PARE MELLE

#### Table 2.8

### **Evaluation of Available Data - Operable Unit 4**

				Ľ
		SWMU	Potential Contaminants	
SITE		NUMBER	(based on site description/ records)	
NUMBER	DESCRIPTION			L
-	Durating 400 South Area (SW Corner next Rail Loading Dock)	AOC-H	VOCs, PAHs, pesticides, metals	l



#### Table 2.9

### Evaluation of Available Data - Screening Sites

SITE NO.	DESCRIPTION	SWMU No.	POTENTIAL CONTAMINANTS (based on site description/records)
19	Former Tear Gas Canister Burn Site (Dunn Field)	19	PAHs
20	Probable Asphalt Burial Site (Dunn Field)	20	PAHs
21	XXCC-3 Burial Site	21	unknown
28	Hazardous Materials Recoup Facility (Bldg. 865)	28	unknown
31	Former Paint Spray Booth (inside Bldg. 1087)	31	Metals, PAHs, Pest/PC8s
33	Sandblasting Waste Drum Storage Area	33	Sendblast Grit, Paint Chips, E.P.
· .	(Metal Shed S. if Bldg. 1088)	· · · · · · · · · · · · · · · · · · ·	Toxic Melals
35	DRMO Bidg, T-308, Hazardous Waste Storage	35	Flammables, Caustics, Acids
37	DRMO Hazardous Waste Gravel Storage Pad	37	Metals, PAHs
38	DRMO Damaged/Empty Hazardous Materials	38	Metals, PAHs, Pest/PCBs
39	DRMO Damaged/Empty Lubricant Container Area	· 39	VOCs, PAHs
42	Former PCP Dip Vat Area	42	PCPs
43	Former Underground PCP Tank Area	43	PCPs
46	Former PCP Drying Area	46	PCPs
50	Dunn Field Northeast Quadrant Stormwater drainage Channel	AOC-A	Metals/Pest.
_54	DRMO Drainage Ditch (East)	AOC-E	unknown
55	DRMO Drainage Ditch (North)	AOC-F	unknown
56	Main Installation Stormwater Drainage Ditch (West)	AOC-G	unknown
60	Pistol range Impact Area/Bullet Stop		Metals
61	Buried Drain Pipe (NW Quadrant of Dunn Field)		VOCs, Metals or Construction. Debris
62	Bauxite Storage (Dunn Field, NE Quadrant)		Metals

Revised 6 OCT 94: Site 33 now listed in Table 2.9.

### Table 2.9 (cont.)

### Evaluation of Available Data - Screening Sites

SITE NO.	DESCRIPTION		POTENTIAL CONTAMINANTS (based on site description/records)
64	Bauxite Storage (Dunn Field, SW Quadrant)		Metals
85	XXCC-3 (Bidg. 249)		unknown
66	POL (Bldg, 253)		VOCS, PAHS
67	MOGAS (Bldg. 257)		VOCs, PAHs
68	POL (Bldg, 263)(20x40 ft.)		VOCs, PAHs
69	2.4-D, M2A1 & M4 flame-thrower liquid fuels		PAHs
	(surface application)		
70	POL, various chemicals (RR tracks	_	PAHs, Pest/PCBs
	1,2,3,4,5,6) - suspected leaks		
. 71	Herbicide (all RR tracks)(used to clear tracks)		Pesticides
72	Waste Oil (PDO yard)(surface application for		VOCS, PAHS
	dust control)		
73	2.4 Dichlorophenoxyacetic Acid (ail grassed	_	PAHs, Pest/PCBs
	areas)(applied to surface)		
74	Flammables, toxics Bldg, 319, West end)		VOCs, PAHs, metals, Pest/PCBs
75	Unknown wastes near Bidg. 689	·	PAHs, Pest/PCBs
76	Uaknown westes near Bidg. 690		PAHs, Pest/PCBs
77	Unknown wastes near Bldg. 689 & 690		PAHs, Pest/PC8s
78	Alcohol, acetone, toluene, naphtha;		VOCs, PAHs
	hydrofluoric acid soill (vicinity 689)		
79	Fuels, misc, liquids, wood, paper (vicinity		VOCs, PAHS
	S70Z)		
80	Fuel dispensing (Bldg. 720)		VOCs, PAHs
81	Fuel oil (Bldg. 765)	<u> </u>	VOCs, PAHs
82	Flammables (Bldg. 783)		VOCs, PAHs, Pest/PCBs
83	POL (isooctane, toluene, acetone, MEK.		Metals, VOCs
	naphtha) areas X-13, 15, & 25		
R4	Flammables, solvents, waste oil, etc. (Bidg.		VOCS, PAHS
	972)		

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Table 2.10
Proposed No Further Action Sites

SITE NO.	DESCRIPTION	COMMENTS
18	Airplane Crash Residue (Dunn Field)	NFA per RCRA Permit - No hazardous substances at site
22	Hardware Burial Site (Nuts and Bolts)(Dunn Field)	Proposed NFA Site - No hazardous substances at site
23	Construction Debris and Food Burial Site (Dunn Field)	Proposed NFA Site - No hazardous substances at site
30	Paint Spray Booths (Bldg. 260, 770, & 1086)(OUs 2&3)	NFA per RCRA Permit - active paint spray booths
40	Safety-Kleen Units (9 interior locations)(OUs 2&3)	NFA per RCRA Permit - low potential for release
41	Satellite Drum Accumulation Area (5 locations)(OUs 2& 3)	NFA per RCRA Permit - low potential for release
44	Former Waste Water Treatment Unit	NFA per RCRA Permit - Extensive Remediation in 1985/86
45	Former Contaminated Soil Staging Area	NFA per RCRA Permit - Extensive Remediation in 1985/86
47	Former Contaminated Soil Storage Area (Igloo interior)	NFA per RCRA Permit - Extensive Remediation in 1985/86
49	Medical Waste Storage Area (Bldg, 359 interior)	NFA per RCRA Permit - expired shelf life medical supplies (off site disposal)
53	X-25 Flammable Solvents Storage Area (between Bldgs, 925 & 949)	NFA per RCRA Permit - bermed concrete storage pad; former spill site
63	Fluorspar Storage (SE Quadrant of Dunn Field)	Proposed NFA Site - storage of non-hazardous commodity
86	Food Supplies (Dunn Field)	Proposed NFA Site - No hazardous substances at site

4.0 GLOSSARY OF TERMS.

AOC - Area of Concern

BX - Base Exchange

CEHND - United States Army Corps of Engineers, Huntsville Division

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CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act

DDT - 1,1,1-Trichloro-2,2-bis(p-chioro-phenyl)ethane

DDD - Dichlorodiphenyl-dichloroethane

DDE - Dichlorodiphenyl-dichloroethylene

DDMT - Defense Distribution Depot Memphis, Tennessee

DDRC - Defense Distribution Region Central

DDRE - Defense Distribution Region East

- DLA Defense Logistics Agency
- DoD Department of Defense
- EPA United States Environmental Protection Agency

FFA - Federal Facilities Agreement

IA - Installation Assessment

IRP - Installation Restoration Program

NFA - No Further Action

OU - Operable Unit

- PAH Polynuclear Aromatic Hydrocarbon
- PCB Polychlorinated Biphenyl
- PCP Pentachlorophenol
- PSC Potential Source of Contamination
- RCRA Resource Conservation and Recovery Act
- RFA RCRA Facility Assessment
- RI/FS Remedial Investigation/ Feasibility Study
- RPM Remedial Project Manager

TDEC - Tennessee Department of Environment and Conservation

TDOH - Tennessee Department of Health

SARA - Superfund Amendment and Reauthorization Act

SMP - Site Management Plan

SWMU - Solid Waste Management Unit

USAEHA - United States Army Environmental Hygiene Agency

USATHAMA - United States Army Toxic and Hazardous Materials Agency (now referred to as the United States Army Environmental Center (AEC))

UST - Underground Storage Tank

VOC - Volatile Organic Compound

#### APPENDIX A

#### REFERENCES

1. Law Environmental, April 1989, "Remedial Investigation/ Feasibility Study (RI/FS) at DDMT, Revised Final Work Plans."

2. Law Environmental, August 1990, "Remedial Investigation at DDMT, Final Report."

3. Law Environmental, August 1990, "Report Appendices for Remedial Investigation at DDMT, Final Report."

4. Law Environmental, September 1990, "Feasibility Study for DDMT, Final Report."

5. U.S. Army Environmental Hygiene Agency, 1985, Environmental Audit No. 43-21-1387-86, Defense Depot Memphis, Memphis, Tennessee.

6. U.S. Army Environmental Hygiene Agency, 1982, Geohydrologic Study No. 38-26-0195-83, Defense Depot Memphis, Memphis, Tennessee.

7. U.S. Army Environmental Hygiene Agency, 1986, Groundwater Consultation No. 38-26-0815-87: Collection and Analysis of Groundwater Samples, Defense Depot Memphis, Tennessee.

8. U.S. Army Environmental Hygiene Agency, 1986, Water Quality Biological Study No. 32-24-0733-86, Investigation of Fire Reservoir, DDMT.

9. U.S. Army Toxic and Hazardous Materials Agency, Installation Assessment of Defense Depot Memphis, Tennessee, July 1982.

10. Summary Report, On-Site Remedial Activities at the Defense Depot Memphis, O.H. Materials Company, 24 February 1986.

11. U.S. Environmental Protection Agency, RCRA Facility Assessment, Defense Depot Memphis Tennessee, January 1990.. RCRA Facility Assessment, U.S. EPA, January 1990.

12. Letter, 15 November 1985, Tennessee Dept. of Health and Environment to Commander, DDMT, subject: Results of 8 November 1985 Meeting Concerning On-Site Remedial Activities and Clean-Up Levels.

13. Engineering Report, Removal Action for Groundwater at DDMT, Engineering Science, August 1993 (Draft Final).

14. Environmental Assessment, Removal Action for Groundwater at DDMT, Engineering Science, August 1993 (Draft Final).

### APPENDIX B

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### GENERIC WORKPLANS SCHEDULE

	No. of DAYS	START DATE	FINISH DATE
	90	12-Oct-93	9-Jan-94
Draft Generic Health and Safety Plan	89	13-Oct-93	9-Jan-94
Draft Generic Quality Assurance Project Plan		13-Oct-93	9-Jan-94
Draft Generic RI/FS Workplan	267	10-Jan-94	3-Oct-94
Regulatory Agencies' Review	60	4-Oct-94	2-Dec-94
DLA Responds to Regulators' Comments	120	4-Oct-94	31-Jan-95
Incorporate Comments & Submit Draft Final Generic Workplans (5)	30	1-Feb-95	2-Mar-95
Regulatory Agencies Review	35	1-Feb-95	7-Mar-95
Final Plans Approved			

### APPENDIX B

#### OPERABLE UNIT 1 SCHEDULE

DESCRIPTION	No. of DAYS	START DATE	FINISH DATE
Draft OU-1 Feild Sampling Plan (FSP)	90	12-Oct-93	9-Jan-94
Regulatory Agencies' Review	302	10-Jan-94	7-Nov-94
DLA Responds to Regulators' Comments	60	8-Nov-94	6-Jan-95
Incorporate Comments & Submit Draft Final OU-1 FSP	120	8-Nov-94	7-Mar-95
Regulatory Agencies' Review	30	8-Mar-95	6-Apr-95
Final OU-1 FSP Approved	35	8-Mar-95	11-Apr-95
Field Work (Incl Upgrading Screening Sites)	200	12-Apr-95	28-Oct-85
Date Validation	30	29-Oct-95	27-Nov-95
Draft Remedial Investigation (RI) Report	60	28-Nov-95	26- <i>tao-</i> 96
Regulatory Agencies' Review	60	27-Jan-96	26-Mar-95
DLA Responds to Regulators' Comments	60	27-Mar-96	25-May-96
Incorporate Comments & Submit Draft Final RI Report	120	27-Mar-96	24-Jul-96
Regulatory Agencies' Review	30 .	25-Jul-96	23-Aug-96
Final RI Report Approved	35	25-Jul-96	28-Aug-96
Draft Feasibility Study (FS)	60	26-May-96	24-Jul-98
Regulatory Agencies' Review	60	25-Jul-96	22-Seo-96
OLA Responds to Regulators' Comments	60	23-Sep-96	21-Nov-98
Incorporate Comments & Submit Draft Final FS	120	23-Sep-96	20-Jan-97
Regulatory Agencies' Review	30	21-Jan-97	19-Feb-97
Final RI Report Approved	35	21-Jan-97	24-Feb-97
Draft Proposed Remedial Action Plan (PRAP)	60	25-Feb-97	25-Apr-97
Regulatory Agencies' Review	60	26-Apr-97	24-Jun-87
DLA Responds to Regulators' Comments	60	25-Jun-97	23-Aug-97
Incorporate Comments & Submit Draft Final PRAP	120	25-Jun-97	22-Oct-97
Regulatory Agencies' Review	30	23-Oct-97	21-Nov-97
Final PRAP Report Approved	35	23-Oct-97	26-Nov-97
Prepare Public Notice	32	23-Oct-97	23-Nov-97
Publish Public Notice	7	24-Nov-97	30-Nov-97
Public Comment Period	30	1-Dec-97	30-Dec-97
Public Meeting	1	11-Dec-97	11-Dec-97
Prepare Public Responsiveness Summary	30	12-Dec-97	10-Jan-98
Draft Record of Decision (ROD)	60	24-Aug-97	22-Oct-97
Regulatory Agencies' Review	60	23-Oct-97	21-Dec-97
DLA Responds to Regulators' Comments	60	22-Dec-97	19-Feb-98
Incorporate Comments & Submit Draft Final ROD	120	22-Dec-97	20-Apr-98
Regulatory Agencies' Review	30	21-Apr-98	20-May-98
Final ROD Approved and Signed	35	21-Apr-98	25-May-98



### APPENDIX B

#### OPERABLE UNIT 2 SCHEDULE

	No. of DAYS	START DATE	FINISH DATE
DESCRIPTION	60	12-Dec-93	9-Feb-94
Oran OU-2 Feild Sampling Plan (FSP)		10-Feb-94	21-Nov-94
Regulatory Agencies' Review		22-Nov-94	20-Jan-95
DLA Responds to Regulators' Comments	120	22-Nov-94	21-Mar-95
Incorporate Comments & Submit Draft Final OU-2 FSP		22-Mar-95	20-Apr-95
Regulatory Agencies Review	35	22-Mar-95	25-Apr-95
Final OU-2 FSP Approved	200	26-Apr-95	11-Nov-95
Field Work (Inc) Upgrading Screening Sites)		12-Nov-95	11-Dec-95
Data Validation	03	12-Dec-95	9-Feb-96
Draft Remedial Investigation (RI) Report		10-Feb-96	9-Apr-96
Regulatory Agencies' Review		10-Apr-96	8-Jun-96
DLA Responds to Regulators' Commants	120	10-Apr-96	7-Aug-06
Incorporate Comments & Submit Draft Final RI Report		8-Aug-96	6-Sep-96
Regulatory Agencies Review	35	8-Aug-96	11-Sep-96
Final RI Report Approved		9-Jun-96	7-Aug-96
Draft Feasibility Study (FS)		8-Aug-96	6-Oct-96
Regulatory Agencies Review		7-Oct-96	5-Dec-96
DLA Responds to Regulators' Comments		7-Oct-96	3-Feb-97
Incorporate Comments & Submit Draft Final FS		4-Feb-97	5-Mar-97
Regulatory Agencies' Review	35	4-Feb-97	10-Mar-97
Final RI Report Approved		11-Mar-97	9-May-97
Draft Proposed Remedial Action Plan (PRAP)		10-May-97	8-Jul-97
Regulatory Agencies' Review		9-Jul-97	6-Sep-87
DLA Responds to Regulators' Comments		9-Jul-97	5-Nov-97
Incorporate Comments & Submit Draft Final PRAP		6-Nov-97	5-Dec-97
Regulatory Agencies' Review		6-Nov-97	10-Dec-97
Final PRAP Report Approved		6-Nov-97	7-Dec-97
Prepare Public Notice		8-Dec-97	14-Dec-97
Publish Public Notice	- 30	15-Dec-97	13-Jan-98
Public Comment Period		25-Dec-97	25-Dec-97
Public Meeting	30	26-Dec-97	24-Jan-98
Prepare Public Responsiveness Summary		7-Sep-97	5-Nov-97
Draft Record of Decision (ROD)		6-Nov-97	4-Jan-98
Regulatory Agencies' Review		5-Jan-98	5-Mar-98
DLA Responds to Regulators' Comments		5-Jan-98	4-May-98
Incorporate Comments & Submit Draft Final ROD		5-May-98	3-Jun-98
Regulatory Agencies' Review		5-May-98	8-Jun-98
Final ROD Approved and Signed			

### APPENDIX B

#### OPERABLE UNIT 3 SCHEDULE

DESCRIPTION	No. of DAYS	START DATE	FINISH DATE
Draft OU-3 Feild Sampling Plan (FSP)	60	13-Jan-94	13-Mar-94
Regulatory Agencies' Review	274	14 Mer-94	12-Dec-94
OLA Responds to Regulators' Comments	60	13-Dec-94	10-Feb-95
Incorporate Comments & Submit Draft Final OU-3 FSP	120	13-Dec-94	11-Apr-85
Regulatory Agancies' Review	30	12-Apr-95	11-May-95
Final OU-3 FSP Approved	35	12-Apr-95	16-May-95
Field Work (Incl Upgrading Screening Sites)	200	17-May-95	2-Dec-95
Data Validation	30	3-Dec-95	1-Jan-96
Draft Remedial Investigation (RI) Report	60	2-Jan-96	1-Mar-96
Regulatory Agencies' Review	60	2-Mar-96	30-Anr-96
DLA Responds to Regulators' Comments	60	1-May-98	29-Jun-98
Incorporate Comments & Submit Draft Final RI Report	120	1-May-96	28-Aug-96
Regulatory Agencies' Review	30	29-Aug-96	27-Sep-96
Final RI Report Approved	35	29-Aug-98	2-Oct-96
Draft Feasibility Study (FS)	60	30-Jun-96	28-Aug-96
Regulatory Agencies' Review	60	29-Aug-96	27-Oct-96
DLA Responds to Regulators' Comments	60	28-Oct-96	26-Dec-96
Incorporate Comments & Submit Draft Final FS	120	28-Oct-98	24-Feb-97
Regulatory Agencies Review	30	25-Feb-97	26-Mar-97
Final RI Report Approved	35	25-Feb-97	31-Mar-97
Draft Proposed Remedial Action Plan (PRAP)	60	1-Apr-97	30-May-97
Regulatory Agencies' Review	60	31-May-97	29-Jul-97
DLA Responds to Regulators' Comments	50	30-Jul-97	27-Sep-97
Incorporate Comments & Submit Draft Final PRAP	120	30-Jui-97	26-Nov-97
Regulatory Agencies' Review	30	27-Nov-87	26-Dec-97
Final PRAP Report Approved	35	27-Nov-97	31-Dec-97
Prepare Public Notice	32	27-Nov-97	28-Dec-97
Publish Public Notice	7	29-Dec-97	4-Jan-98
Public Comment Period	30	5-Jan-98	3-Feb-98
Public Meeting	_ 1 [	15-Jan-98	15-Jan-98
Prepare Public Responsiveness Summary	30	16-Jan-98	14-Feb-98
Draft Record of Decision (ROD)	60	28-Sep-97	26-Nov-97
Regulatory Agencies' Review	60	27-Nov-97	25-Jan-98
DLA Responds to Regulators' Comments	60	26-Jan-98	26-Mar-98
Incorporate Comments & Submit Draft Final ROD	120	26-Jan-98	25-May-98
Regulatory Agencies' Review	30	26-May-98	24-Jun-98
Final ROD Approved and Signed	35	26-May-98	29-Jun-98

### APPENDIX B

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#### OPERABLE UNIT 4 SCHEDULE

DESCRIPTION	No. of DAYS	START DATE	FINISH DATE
	60	13-Feb-94	6-May-94
Draft OU-4 Felio Sampling Plan (FSF)	234	9-May-94	28-Dec-94
Regulatory Agencies Review	60	29-Dac-94	26-Feb-95
DLA Responds to Regulators Comments	120	29-Dec-94	27-Apr-95
Incorporate Comments & Submit Drait ( Inal CO-41 C)	30	28-Apr-95	27-May-95
Regulatory Agencies Review	35	28-Apr-95	1-Jun-95
Final OU-4 FSP Approved	200	2-Jun-95	18-Dec-95
Field Work (Incl Upgrading Screening Snee)	30	19-Dec-95	17-Jan-96
Data Validation	60	18-Jan-96	17-Mar-96
Draft Remedial Investigation (RI) Report	60	18-Mar-96	16-May-96
Regulatory Agencies' Review		17-May-96	15-Jul-96
DLA Responds to Regulators' Comments	120	17-May-96	13-Sep-96
Incorporate Comments & Submit Draft Final RI Report		14-Sep-96	13-Oct-98
Regulatory Agencies' Review	35	14-Sep-96	18-Oct-98
Final RI Report Approved		16-Jul-96	13-Sec-98
Draft Feesibility Study (FS)		14_Sep-96	12-Nov-98
Regulatory Agencies' Review	80	13-Nov-96	11-Jan-97
DLA Responds to Regulators' Comments		13-Nov-96	12-Mar-97
Incorporate Comments & Submit Draft Final FS	- 20	13-Mar-97	11-Apr-97
Regulatory Agencies' Review		13-Mar-97	16-Apr-97
Final RI Report Approved		17-006-07	15-Jun-97
Oraft Proposed Remedial Action Plan (PRAP)		16- Jun-97	14-Aug-97
Regulatory Agencies' Review		15.410-07	13-Oct-97
DLA Responds to Regulators' Comments		15-Aug-97	12-Dec-97
Incorporate Comments & Submit Draft Final PRAP		13.0ec-97	11-Jen-98
Regulatory Agencies' Review		13-Dec-97	18-Jan-98
Final PRAP Report Approved		13-Dec-97	21-Jan-98
Prepare Public Notice		22-120-98	28-Jan-98
Publish Public Notice		20-lan-98	27-Feb-98
Public Comment Period		8.5ah-98	8-Feb-88
Public Meeting		9-Eeb-98	10-Mar-98
Prepare Public Responsiveness Summary		14 00-07	12-Dec-97
Draft Record of Decision (ROD)		12.000-97	10-Feb-98
Regulatory Agencies' Review		11 Eab 09	11_Apr-98
DLA Responds to Regulators' Comments	50	11-Feb-90	10_100-98
Incorporate Comments & Submit Draft Final ROD	120	11-140-30	10_10_98
Regulatory Agencies' Review		11 10 00	15-Jul-98
Final ROD Approved and Signed		<u></u>	10-001-00

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## APPENDIX B

### SCREENING SITES SCHEDULE

DESCRIPTION	INC. of David	<u> </u>	
Regulation of the Feild Sampling Plana (FSP)	INO. OF DAYS	START DATE	FINISH DATE
IN A Devices' Review	172	12-Oct-93	1.Apr.94
CCA Responds to Regulators' Comments	196	2-Apr-94	14-04 04
Deputate Comments & Submit Draft Final ESPe		15-Oct-94	13-000-04
Figuratory Agencies' Review	120	15-Oct-94	11-Eab 05
Final Screening Sites Sampling Plan Approved		12-Feb-95	13.4401.05
Field Work	35	12-Feb-95	19-Mar-05
Data Validation	200	19-Mar-95 T	10-14-95
Oraft Screening Sites Results Report		5-Oct-85	<u>4-0a-95</u>
Regulatory Agencies' Review	60	4-Nov 95	3-NOV-85
DLA Responds to Regulators' Commonte	60	3-100-35	<u>2-Jan-96</u>
ncorporate Comments & Submit Droe Floring	60	3-Mac 08	2-Mar-96
Regulatory Agencies' Review	120	3-Mar 90	_1-May-96
inal Report Approved	30	1-140-00	
PA-TDEC-DLA Maeting to Lingrade D	35		
raft Workplan Addendus	15		4-Aug-96
egulatory Agencies' Poview	.60	- AUD-90	19-Aug-96
LA Responds to Reputation of		20-Aug-98	16-Oct-96
corporate Comments		19-Oct-96	17-Dec-98
equiatory Association Submit Draft Final Workplan		18-Dec-96	15-Feb-07
Rel Screening Silve Co		16-Dec-96	16-Apr-97
ald Work at Llored a moting Plan Approved		17-Apr-97	16-May-97
torn at opgraded Sites		Apr-97	21-May-97
	60	22-May-97	20-Jul-97





