



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 77

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2500 MT. MORIAH
MEMPHIS, TENNESSEE 38115

September 9, 1994

Commander
Defense Distribution Depot Memphis
Attn: DDMT-WP (Mr. Frank Novitzke)
2163 Airways Blvd.,
Memphis, Tennessee 38114-5210

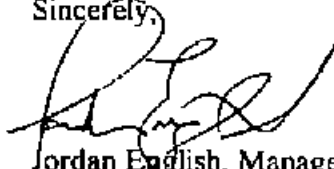
Re: Draft Proposed Groundwater Action Plan for Groundwater for DDRC, submitted
August 18, 1994, TDSF #79-736, cc 82

Dear Mr. Novitzke:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Draft Proposed Groundwater Action Plan for Groundwater for DDRC received on 8/18/94.

Pursuant to the intent of the Federal Facilities Agreement (FAA) being currently negotiated the Tennessee Department of Environment and Conservation (TDEC) is providing the enclosed comments. Should you have any questions or concerns regarding this review or the Site in general please call at (901) 368-7953

Sincerely,


Jordan English, Manager
Memphis Field Office
Tennessee Division of Superfund

Enclosure

c: TDSF, NCO
TDSF, MFO
Martha Berry
United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

**Comments on the
Proposed Groundwater Action Plan
for Dunn Field at
Defense Depot Memphis
TDSF Site # 79-736
9/9/94**

General Comments:

Although it appears that previous TDSF comments have been taken into consideration, the document appears to be a confusing mix of the old Engineering Science Feasibility Study and most recent discussions regarding plume characterization/definition and plume edge extraction. It is difficult to define just what remedy has been selected. Page 4 indicates that the alternative selected includes on-site extraction, air stripping, and discharge to surface water. Page 7 and Figure 1, however, indicate that the remedy selected will pump groundwater from a series of wells located along the leading edge of the plume. The Selected Remedy must be clearly communicated.

Specific Comments:

1. Page 4,--Only one alternative includes both on-Site and off-Site extraction wells. Why? The selected alternative as described on this page is inconsistent with the description on page 7 and Figure 1.
2. Page 5, last paragraph--If the objective of the removal IRM is to prevent further movement of contaminated groundwater in the Fluvial Aquifer and to prevent possible contamination of the area's drinking water supply then it seems incumbent to define where that contamination exists before it can be contained/removed.
3. Page 6, third bullet in center of page--This passage is not worded correctly. If a window exists then it is not a confining unit. TDSF suggests changing the wording to read "The Fluvial Aquifer potentially recharges the Memphis Sand Aquifer by leakage through interconnecting windows in what is otherwise considered a regional-confining clay that separates the two aquifers in most of the Memphis area."
4. Page 6, Summary of Site Risks, bottom of page--A response to the general comments will be required before language in this section can be commented on.
5. Page 8, first full paragraph--This paragraph suggests that RI activity will be required to effectively implement the IRM (ie. adequately characterizing the plume to adequately design extraction wells). What is wrong with including monitoring well installation in IRM process for design purposes?

6. Page 8, fifth bullet--Change word "effect" to "effects". This is intended to be a measure of the degree of impact to both Site workers and nearby residents.
7. Figure 1--The indicated arrangement of extraction wells indicates that the proposed plan does include off-Site extraction wells. Is this true? Please clarify. Also, is the offset in the property line beneath the word "plume" real or a drafting error?
8. Page 10, Short Term Effectiveness--See comment # 6 above.
9. Page 11, Summary of the Preferred Alternative--This summary should include a brief description of the alternative other than to just name it.

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