



**THE MEMPHIS DEPOT
TENNESSEE**

**ADMINISTRATIVE RECORD
COVER SHEET**

AR File Number 79



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

SEP 20 1994

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DDMT
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CERTIFIED MAIL
RETURN RECEIPT REQUESTEDCommander
Attn: DDMT-DE (Frank Novitzki)
Defense Distribution Depot Memphis
2163 Airways Blvd.
Memphis, Tennessee 38114SUBJ: Defense Distribution Depot, Memphis, Tennessee (DDMT)
TN4 210 020 570

Dear Mr. Novitzki:

At the August 18, 1994 RPM meeting, DDMT submitted the draft Proposed Groundwater Action Plan to EPA and TDEC for review. Enclosed are EPA's comments on the draft document. After DDMT has reviewed these comments, EPA looks forward to working with DDMT to revise the draft document.

If you have any questions or comments, please contact me at 404/347-3555, vmx. 6431.

Sincerely,


Martha Berry
Remedial Project Manager
Federal Facilities Branch

Enclosure

cc: Jordan English, TDEC

EPA COMMENTS
OPERABLE UNIT 1
DRAFT PROPOSED PLAN, INTERIM REMEDIAL ACTION FOR DUNN FIELD
DEFENSE DISTRIBUTION DEPOT
MEMPHIS, TENNESSEE

1. Introduction: The Introduction should be expanded to discuss the purpose of the proposed plan. Specifically, the introduction should state that the purpose of the Proposed Plan is to: Identify a preferred alternative for the OU; describe other remedial options considered in detail in the Feasibility Study; solicit public review and comment; and provide information on how the public can be involved in the remedy selection process.

DDMT should be identified as the lead agency for the cleanup operation. Also, the draft Proposed Plan should be revised to reflect the fact that both EPA and TDEC are the lead regulatory agencies for the Site.

2. Site Background: The Site Background Section should be expanded and should include an overview of the Site including a map, as well as a discussion of the history of the Site. The Site Background section should note that the Site was broken into operable units as a means of managing Site cleanup. A brief description of each operable unit should be included as well as a statement that this action represents the first step in the remediation of OU1. Additional actions will be necessary to provide long term definitive protection for the OU1.

The Proposed Plan should state that the "Remedial Investigation/Feasibility Study" done by Law Environmental was conducted on a Site wide basis and was used to identify the operable units. It should be noted that the alternatives identified in these studies were preliminary and that additional studies are necessary to identify appropriate remedial alternatives for further consideration for each OU.

The summary of the RI provided on page 3 should mention the associated risks from the Fluvial Aquifer. The risks associated with the Memphis Sands Aquifer and surface water are mentioned, but not with the Fluvial Aquifer.

A figure showing the entirety of the DDMT and the location of Dunn Field with respect to the main part of the installation should be included in the proposed plan. This figure would be figure 1; the figure following page 8 would become Figure 2.

The deeper aquifer is the Memphis Sand aquifer, rather than Memphis Sands aquifer.

The second to last paragraph on page 4 states that a particular alternative was "selected". The proposed plan should be modified to state that the alternative was selected as the "preferred" alternative.

The Engineering Report Removal Action for Groundwater should be renamed "Focused Feasibility Study for Groundwater Containmentment at Dunn Field".

The top of page 5 lists the positive and negative effects of the selected action (i.e., the alternative stated above). This list should also include: (a) release of metals to surface water; and (b) meeting NPDES permit requirements.

The first full paragraph on page 5 implies that the only reason that the Site ranked on the NPL was because of contamination from Dunn Field. If there were other factors affecting the decision to rank this Site, please modify accordingly. Also, the paragraph states, "Once a Site is placed on the NPL, a RI must be conducted regardless of previous studies." This statement is contrary to EPA's policy on conducting early "pre-listing" RIs. Please revise the statement as follows, "RIs must be conducted for all Sites that are placed on the NPL."

3. Scope and Role of Response Action: The information contained in the first paragraph should also be on the first page.

This Section should describe the scope of the problem that the action will address. It should also describe the role of the action within the operable unit and site strategy.

In discussing the objective of this interim action, this section should note that the interim action is intended to achieve quick results which are necessary to stabilize the site and prevent further degradation. Also, subsequent action will be taken to provide long-term definitive protection of the contaminated groundwater. Moreover, the following language should be added, "To the extent possible, the interim action will not be inconsistent with, nor preclude implementation of, the expected final remedy."

In the last paragraph, the term "removal IRM" is used. This term should be changed to "IRA".

4. Summary of Site Risks: It is not clear from this section what the contaminants of concern (COCs) are. Additional detail should be added regarding the COCs and what they pose a potential

risk. For example, a table that included levels found in the monitor wells and compared those levels with MCLs, etc. would be very useful here.

A more complete description of Allen Well Field and why the COCs in the groundwater pose a risk to it should be provided here.

The text should state that MCLs have been established by the Safe Drinking Water Act, rather than the Clean Water Act.

The following language must be added, "Actual or threatened releases of hazardous substances from this Site, if not addressed by the preferred alternative or one of the other active measures considered, may present a current or potential threat to public health, welfare or the environment."

5. Summary of Alternatives: The E-S Report lists seven remedial alternatives (Table 8.1 of August 1993 version), yet only three are described here. A narrative description of all seven alternative evaluated in detail in the Focused FS should be provided.

There is an Alternative 2 - Institutional Control alternative in the Proposed Plan that is not found in the E-S Report. The Proposed Plan is meant to be a summary of previous work; not a place for new alternatives to be developed. Unless it is intended that the revised Focused Feasibility Study to include an institutional control alternative, Alternative 2 should be deleted from the Proposed Plan.

If Alternative 2 is to be retained in the Focused FS and the Proposed Plan, then the final sentence of text should state "A restriction on both well construction and withdrawal of ground water from the Fluvial aquifer in the contaminated area would be implemented."

The top of page 8 states the selected alternative includes disposal of waste water into the sanitary sewer system while page 4 states that the waste water will be discharged into surface water drainage. A more comprehensive description of what will happen to the water after it is pumped from the ground is needed in both places.

A statement should be added to the last paragraph of this section stating that data gathered during the OUI RI will be used to develop the remedial design for the proposed IRA.

6. Compliance with ARABS: This discussion should be reevaluated in light of Comment Five. The necessity for pretreatment prior to discharge into the city POTW should be established as a part of the remedy decision process. The costs of the pretreatment

options have been established in the E-S Report and should be reported here.

7. Reduction of Toxicity, Mobility or Volume through Treatment: DDMT may want to add a statement in the section that the hydraulic barrier will reduce the potential for vertical contaminant migration into the Memphis Sand aquifer.

8. Community Participation: Please add the following statement, "Alternative 3 is the preferred alternative. However, changes to the preferred alternative, or a change from the preferred alternative to another alternative, may be made if public comments or additional data indicate that such a change would result in a more appropriate solution."

9. Glossary: DDMT may want to define VOCs as "...solvents, degreasers, paint thinners, and fuels." The present glossary states that VOCs are paints and thinners.

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