



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 84



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File: 541 460 d
C.G. 84

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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DDMT-DE
NOV 15 1994

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commander
Attn: DDMT-DE (Frank Novitzki)
Defense Distribution Depot Memphis
2163 Airways Blvd.
Memphis, Tennessee 38114

SUBJ: Defense Distribution Depot, Memphis, Tennessee (DDMT)
TN4 210 020 570

Dear Mr. Novitzki:

At the October 20, 1994 RPM meeting, DDMT submitted the second 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
SECOND DRAFT PROPOSED PLAN
INTERIM REMEDIAL ACTION FOR DUNN FIELD
DEFENSE DISTRIBUTION DEPOT
MEMPHIS, TENNESSEE

Introduction Section

The first paragraph of the Introduction should state that a "site wide" RI/FS is being planned. The first paragraph should also state that the IRA is intended to stabilize conditions at Dunn Field.

In the third paragraph, delete the sentence that begins, "TDEC will assume...". Members of the public could interpret this sentence to mean that TDEC is assuming a secondary role to EPA in this process; which is not the case.

Site Background

In the paragraph before the "Previous Studies" Section, include additional explanation of the role of the IRA in the total OU remediation strategy. It is suggested that the first paragraph of the "Scope and Role..." section be moved here instead.

Previous Studies

Change the name "Engineering Report Removal Action for Groundwater" to "Focused Feasibility Study: Dunn Field".

In the discussion of the Site-wide RI discuss how the results relate to the Dunn Field OU.

The discussion of alternatives for Dunn Field evaluated by the Law Environmental FS should be deleted. These findings were very preliminary in nature and their inclusion in the Proposed Plan is confusing. The only alternatives that should be presented in the Proposed Plan are those that were selected for further consideration in the FS for this Interim Action OU.

Please note that the objective of the Focused Feasibility Study is to evaluate alternatives, not to "treat" contaminated groundwater, as stated on page 6.

In the first paragraph on page 7, replace the word "selected" with "preferred".

Before stating that a treatment system is not necessary for this OU, DDMT should evaluate the pretreatment levels which will be

required by the POTW against the level of contaminants currently in the groundwater beneath Dunn Field. Moreover, the Proposed Plan should state that DDMT will meet or exceed any and all national, state or local pretreatment limits.

Please delete last sentence of paragraph preceding "Scope and Role of Response Action" Section. The sentence is irrelevant for purposes of this Proposed Plan.

Scope and Role of Response Action

As this information has been delivered in a previous section, the first paragraph of this section is redundant and should be deleted.

Add more discussion on strategy for managing this OU. It should be noted that once the plume has been fully characterized in terms of size and content, additional action may be taken.

Summary of Alternatives

Please add a discussion of the estimated implementation time for each alternative.

Alternative 8 - With no treatment option included in this preferred alternative, the system will need to be shut down if levels exceed what can be accepted by the POTW, or if, for some reason, the POTW can no longer receive wastewater from DDMT.

Because Alternative 8 does not contain a provision for pretreatment, EPA strongly suggests adding Alternative 3 as a contingency remedy. If Alternative 3 is added to the proposed plan and the IROD as a contingency remedy, then the IROD will not need an amendment at a later date to add the pretreatment option.

Please delete or revise discussion of "Observational Approach". An option may be to move this discussion to end of proposed plan and make it clear that this applies to the design phase, which will take place in the near future.

Evaluation of the Alternatives

ARARs Discussion

Delete first paragraph of ARARs discussion. This paragraph is more concerned with the pretreatment possibilities than with legal ARARs requirements. Instead, add a statement that, under the preferred alternative, wastewater will be discharged to the POTW. If a treatment contingency is not included with the preferred alternative, then the Proposed Plan should note that should treatment be required, the ROD will be amended to include a

treatment option.

It should be stated here that discharge to the POTW is subject to both the substantive and administrative requirements of the national pretreatment program and to all applicable state and local pretreatment regulations.

It should be stated that discharge to the POTW will continue only so long as the POTW is in compliance with EPA's off-site policy.

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