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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Superfund
4th Floor, L & C Annex
401 Church Street
Nashville, Tennessee 37243-1538

October 31, 1994

Mr David Porter
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 10068
Charleston, SC 29411-0068

Re: The Comprehensive RFI Work Plan and the Assembly A Site Investigation Plans for Naval Air Station Memphis, Millington, Tennessee, dated October 6, 1994, TDSF #79-719, cc 82

Dear Mr. Porter:

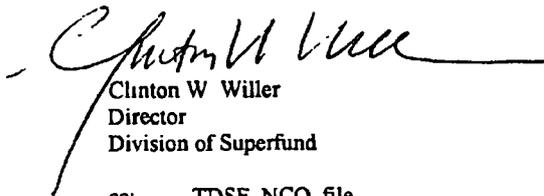
The Tennessee Division of Superfund (TDSF) Memphis Field Office has reviewed the Comprehensive RFI Work Plan and the Assembly A Site Investigation Plans for the Naval Air Station Memphis, Millington, Tennessee, TDSF # 79-719.

With the exception of the attached six (6) comments, the above referenced SOUTHDIV NAVFACENGCOM October 6, 1994 documents have adequately addressed the TDSF's previous concerns and comments regarding deficiencies in the September 15, 1993 documents.

Based upon prior coordination on these comments and inclusion of them in the final documents TDSF hereby conditionally approves these documents.

Should you have any questions regarding this review please contact me at (615) 532-0909.

Sincerely,


Clinton W Willer
Director
Division of Superfund

cc: TDSF, NCO, file
TDSF, MFO. Attn: Jordan English, file
David Williams
United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

Comments for Comprehensive RFI Work Plan
Naval Air Station Memphis, Millington Tennessee,
RCRA Facility Investigation.

1. Section 2.4: Industrial operations and waste generation, pg. 2-13.
The non-hazardous waste sites may not need to be discussed here, however, they should be identified and located on maps as non - hazardous sites for future reference and completeness. In addition, have these non hazardous sites been adequately assessed at this time?
2. Section 2.10: Surface Water Sediments, pg. 2-36.
According to the EPA, storm water drainage ways or wet weather conveyances are considered intermittent in this area of the country. The TDSF suggests that this sample media be designated as a sediment/soil sample.
3. Section 2.13.39: SWMU 59, pg. 2-78.
Due to the fact that 1) hazardous substances may be present at this site as a result of the flooding event, 2) these particular hazardous substances are carcinogenic, and 3) no characterization of this site has occurred to date, demolition of the structure should not proceed until further site characterization is scheduled.
4. Section 4.3.1: After the Well Inventory, pg. 4-7.
Wells with damaged surface seals indicate a well that is technically unable to be sampled due to the high potential for surface water infiltration. Please clarify the proposed use of these wells (i.e. water level observation, water quality, etc.).
5. Section 4.9.2: Water Level Indicator, pg. 4-77.
In addition to the described procedure, and because the NAS Memphis covers such a vast area, time of day and barometric pressure should be recorded and incorporated as part of the procedure. Their effect on the water column could be crucial for correlation purposes given the flat terrain over the Facility proper. Please clarify the time frame of water level measurements and how they will be cross correlated, if applicable.
6. Section 7.1.1: The exclusion zone, pg. 7-3. in paragraph beginning with "Only authorized personnel ..."
An updated documentation package on respirator training (i.e. OJT) for these personnel must be made available and easily accessible for inspection. Please add a statement as to where this documentation package will be kept.