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**STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
MEMPHIS ENVIRONMENTAL FIELD OFFICE  
SUITE E-448, PERIMETER PARK  
2810 MT. MORIAH  
MEMPHIS, TENNESSEE 38116-1520**

February 13, 1995  
Mr. David Porter  
Southern Division, Naval Facilities Engineering Command  
2155 Eagle Drive, P.O. Box 10068  
Charleston, SC 29411-0068

Re: Draft Assembly Site B Investigation Plans, Naval Air Station Memphis,  
Millington Tennessee, RCRA Facility Investigation, dated January 3, 1995,  
TDSF #79-719, cc 82

Dear Mr. Porter:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Draft Assembly Site B Investigation Plans for the Naval Air Station Memphis site, received in this office on January 5, 1995. The TDSF-MFO have the following attached comments.

Should you have any questions or concerns regarding this review please call me at (901) 388-7958.

Sincerely,

James W. Morrison, P.G.  
Environmental Project Manager  
Memphis Field Office  
Tennessee Division of Superfund

c: TDSF, NCO - Attn: Clint Willer, Director DSF, File  
TDSF, MFO, File  
David Williams  
United States Environmental Protection Agency  
Federal Facilities Branch  
345 Courtland Street, N.E.  
Atlanta, GA 30365

**Comments on  
Draft Assembly Site B Investigation Plans  
Naval Air Station Memphis, Millington Tennessee,  
RCRA Facility Investigation  
January 3, 1995**

**Section 1. -- General Comments:**

1. **Speculative phrases and statements at this stage of the RI are inappropriate and should be deleted. (e.g. -- The presence of TPH in the sediment could be attributable to ongoing training activities at these facilities.)**
2. **Given the following facts:**
  1. **There are documented historical release into these ditches.**
  2. **Some of the contaminants released are volatile and are very mobile in the substrate.**
  3. **These ditches are now and have received copious amounts of surface water runoff. (i.e. -- They are wet weather conveyances.)**

**It is TDEC's opinion that the sampling strategy proposed here is insufficient. Surface soil/sediment samples are adequate only for soil exposure potential and for attribution to surface water contamination. This sampling strategy does not address the potential for migration of historically released contaminants to ground water. TDEC suggests that bias selected deeper soil/sediment samples be obtained along with surface soil/sediment samples, not as a consequence of detecting them only in surface samples.**

**Section 1. -- Specific Comments:**

1. **Subsection 3.3, SWMU 10 - Northside Landfill, Eastern Portion, pg 9. Please elaborate as to the types of ashes referred to in the parentheses.**
2. **Subsection 4.3.1, Sediment/soil Sampling, pg 15. Add a sentence that states that deviation from proposed sampling rationale will be documented.**

**Section 2. -- Specific Comments:**

1. **Subsection 4.3, Objectives of Proposed Field Investigation, pg 13. As evidenced at SWMU 7, can DPT reliably and/or definitively rule out the presence of solvent type contamination? TDEC suggests rethinking this assumption as the sole basis for defining sampling parameters.**

2. **Subsection 4.3.2, Soil Boring/Monitoring Well Phase, pg 17.**  
**See specific comment 1 of this section.**
  
  3. **Subsection 4.4, Expansion of Investigation, pg 19.**  
**See general comment 2 under Section 1. Also, please elaborate on and clarify the sentence "If physical evidence of contamination is observed...".**  
**Physical evidence of contaminants at ppm and ppb is hard to see. Did you mean analytical evidence?**
  
  4. **Subsection 5.5, Potential Receptors, page 23.**  
**This comment is in reference to general comment 2 under Section 1.**  
**There is no mention potential receptors via ground water pathway.**
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