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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115-1520

April 24, 1995

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

Re: Gray Area Investigation Report, Naval Air Station Memphis, Millington
Tennessee, dated February 28, 1995, TDEC/DSF #79-719, cc 82

Dear Mr Porter:

The Tennessee Department of Environment & Conservation (TDEC), Division of
Superfund (DSF) Memphis Field Office (MFO) has reviewed the Gray Area Investigation
Report for the Naval Air Station Memphis Site, received in this office on March 6, 1995
The TDEC/DSF-MFO have the following attached comments.

Should you have any questions or concerns regarding this review please call me at (901)
368-7958.

Sincerely,

James W. Morrison, P.G.
Environmental Project Manager
TDEC/DSF-MFO

c: TDEC/DSF-NCO - Attn.: Clint Willer, File
TDEC/DSF-MFO, File
David Williams

United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

General Comment:

This document is well organized and easy to follow. Good job!

TDEC is not convinced that two (2) of the potential sites in the Gray Area warrant NFA's at this time. This is due primarily to 1) the volatile and mobile nature of the contaminants detected at these sites, and 2) the cumulative impact of the releases (potentially large volumes over time). Given the preceding uncertainties, ground water contamination may be present at Facility N-4 and OL-006 (Approach Areas).

Specific Comments:

1. Table 2-1, Building N-122 Data Summary, page 2-4.
This table and others throughout this document have both microgram and milligram per kilogram units in the same table. Some tables have no units identified. These tables need restructuring for clarification purposes.
2. Section 2.2.3, Facility N-4, Findings and Conclusions, page 2-6.
Although 1) no conclusion can be made as to the source, and 2) TPH contaminants are at concentrations below considerations for soil remediation, ground water issues may be present due to volatile and mobile nature of the contaminants. The conclusion needs rethinking before a NFA can be considered.
3. Section 2.3, Facility 761 (Navy Lake Complex), page 2-8.
Subject: Variation of sample collection method (Ponar Dredge).
It is not clear if this variation caused sample location to be altered, please clarify. If so, are the current sample locations representative of historical influences.
4. Section 2.4.2.1, Gasoline Pits, Site Description, page 2-15.
Point of clarification. Have the 68 gasoline pit removals been verified?
5. Section 2.4.2.3, Gasoline Pits, Findings and Conclusions, page 2-16.
Any conclusion made for this potential site must take into consideration ground water issues due to nature of contaminants present.
6. Section 2.4.3.2, Approach areas, Sampling rationale, page 2-19.
Point of clarification. Are we looking in the right place for historical releases of volatile petroleum wastes? Could this be another potential ground water problem?