



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

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

11D-00461

4WD-FFB

DATE: June 21, 1996

SUBJECT: Ecological Risk Assessment (ERA), RCRA Facility  
Investigation - Assembly B, Northside Drainage Ditches,  
NSA Memphis, Millington, Tennessee

FROM: Earl L. Bozeman, Jr. *ELB*  
BRAC RPM  
Federal Facilities Branch

TO: Brian Donaldson  
BRAC RPM  
Federal Facilities Branch

I have reviewed the above referenced document and offer the following comments:

General Comments to the RPM

This ERA focused on the potential impacts to terrestrial and aquatic ecological receptors from exposure to contaminated soil and sediments in the Assembly B area drainage ditch system. The drainage ditch system provides little, if any, permanent aquatic habitat, thus there is no opportunity for exposure to aquatic ecological receptors within base boundaries. The drainage system discharges off-base to North Fork Creek, which does contain viable aquatic habitat. Sediment contamination levels in North Fork Creek below the confluence of the drainage ditch system exceed reference and ecological sediment screening values for most constituents. Some of the contamination may be attributable to runoff from roads and railroads which cross the creek.

This ERA provides an adequate assessment of on-base potential ecological risks associated with the drainage ditch system, however, further evaluation of off-base (North Fork Creek) potential ecological risks should be conducted. Additional sediment sampling (including background/reference samples) should be conducted in North Fork Creek to determine the source of sediment contamination and potential ecological impact of the contamination.

Specific Comments to Preparer of Ecological Risk Assessment

1. Page 8-1, Section 8.1 - In addition to the references cited, include *Supplemental Guidance to RAGS: Region 4 Bulletins - Ecological Risk Assessment*. Attached is a copy of the *Bulletins*

for your information.

2. Page 8-1, Section 8.1.1, second paragraph - Please provide documentation of the qualitative habitat and biota evaluation(s) which were performed during the course of this evaluation and indicate in Figure 8-1 the location of any viable habitats for ecological receptors. In addition, provide information on Federal and State endangered, threatened or special concern species which could or do occur on the site or in North Fork Creek down stream of the base. Be sure to include references for the source(s) of information on the occurrence of endangered, threatened or special concern species.

3. Page 8-3, Section 8.1.2 - Please provide the location of the station for the Reference Concentration sampling referred to in this Section and identify the station on Figure 8-1.

4. Page 8-3, Section 8.1.2, last two sentences - Include this information in Section 8.7, Uncertainty Analysis, rather than in Section 8.1.2.

5. Table 8-1 - Please identify what MCPA stands for under Pesticides/Herbicides/PCBs in this table.

If you have any questions regarding these comments, please contact me at extension 2027.

Attachment