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ENVIRONMENTAL AND MANAGEMENT CONSULTANTS

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May 28, 1999

Commanding Officer
Attn: Mark Taylor/1861MT
SOUTHNAVFACENGCOM
2155 Eagle Drive
P.O. Box 190010
North Charleston, SC 29419-9010

Subject: CTO-094; NSA Mid-South RFI, Millington, Tennessee

Document Transmittal: *RCRA Facility Investigation Report, SWMU 8 — Cemetery Disposal Area, Revision 2, May 28, 1999*

Reference: Contract N62467-89-D-0318 (CLEAN II)

Dear Sir:

Please find enclosed one copy of revised text, covers and spines for the *RCRA Facility Investigation Report, SWMU 8 — Cemetery Disposal Area, Revision 2*. These should be inserted in your existing binder to replace the Revision 1 text, cover and spine. Since the Revision 1 appendices did not change, they should be retained. Responses to USEPA comments are also enclosed. As requested, copies have been distributed to the BRAC Cleanup Team (BCT) and others as shown on the attached NSA Mid-South RFI Distribution List.

If you have any questions or comments of a technical nature, please contact me at 901/372-7962. Comments or questions of a contractual nature should be directed to Debra Blagg at the same number.

Sincerely,

EnSafe Inc.

By: Lawson M. Anderson, CHMM
Task Order Manager

Enclosures: As Stated

cc: Contracts File: CTO-094 (w/out enclosure)
Project File: 0094-22131 (w/out enclosure)
Administrative Record (Sandra Maclin)
SOUTHDIV: Ms. Kim Reavis/Code 0233KR (w/out enclosure)
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Document Date:	May 28, 1999		
Distribution Date:	May 28, 1999		
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Response to EPA Comments
SWMU 8 — Cemetery Disposal Area RFI Report — Revision 1
NSA Mid-South, Millington, Tennessee

Comment 1. Figure 4-3 - What is the significance of the different colors on the figure?

Response to Comment 1: The figure was redone and the different colors signify different dates or different depths of sample collection, as indicated by the legend.

Comment 2. Page 8-3, line 19 - I assume the removal action is the ethylene oxide removal. This should be clarified.

Response to Comment 2: The text was changed to indicate the removal action was the removal of stockpiled soil.

Comment 3. Section 8 - Normally risk assessments and PREs include an uncertainty section. Due to the elevated level of uncertainty in this risk assessment it seems appropriate to include it here.

Response to Comment 3: An uncertainty section has been added to the risk assessment.

Comment 4. Page 10-12, line 10 - I think this sentence is incorrect. I believe dieldrin was detected at higher concentrations.

Response to Comment 4: The text was revised to reflect the higher dieldrin concentrations.

Comment 5. Page 11-1, line 12 - This sentence states that the risk assessment estimates were within EPA's acceptable range of 1 in 10,000 to 1 in 1,000,000; however, Section 8.1 indicates that it was slightly exceeded (2 in 10,000). Please clarify.

Response to Comment 5: The text was changed to reflect one soil sample indicated a dieldrin concentration with a risk estimate of 2 in 10,000.