



1D-00363

TENNESSEE DEPARTMENT OF HEALTH AND ENVIRONMENT
Bureau of Environment
Room 1101, State Office Building
170 North Mid America Mall
Memphis, Tennessee 38103

February 7, 1990

James Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division
EPA Region IV
345 Courtland St.
Atlanta, GA 30365

Dear Mr. Scarbrough:

This letter is written in regard to the review of the Final Draft Remedial Investigation/Feasibility Study Work Plan for NAS Memphis sites No. 1-9, NAS Memphis. In addition the RCRA Facility Investigation Work Plan for SWMU's Number 3 and Number 59 were reviewed.

The following comments are offered to be included in the EPA and TDHE joint response:

1. SWMU No. 1 - Fire Department Drill Area(FDDA) - Although the RFA is referenced in terms of justifying no groundwater monitoring it is felt that a current assessment of the groundwater is appropriate.
2. SWMU No 2 - Southside Landfill
Describe how the contents the landfill cells will be characterized (pg. 42)
Explain how the contaminate source location will be determined (pg. 43).
Define how integrity of the landfill will be determined (pg. 42).
A minimum of three groundwater monitoring wells should be used in the site assessment.
3. SWMU No. 4 - Plating Shop-Sewer and Drainage Ditch No upgradient soil sample is planned to be taken. If there is a possible upgradient surge in the ditch this should be checked.

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4. SWMU No. 7 - Building N-126 Plating Shop Dry Well

Why is Cn not included in sampling parameters?

5. SWMU No. 9 Sewage Lagoons

Should random sampling with more samples be collected?

No comments are offered on SWMU's 10, 11, and 12. In the sample analysis plan reference was made regarding field filtering. It is suggested that if filtering is performed that samples be submitted for both filtered and non-filtered. In addition it is suggested that TOC be included in all groundwater sampling. All sampling equipment should be final rinsed with isopropyl alcohol.

If you have any questions or if I may be of further assistance, please do not hesitate to contact me at 901/543-6695.

Sincerely,



Paul Patterson
Division of Solid Waste Management

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cc: DSWM Nashville