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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

June 6, 1995

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

Re: Follow Up Gray Area Work Plan, Naval Air Station Memphis, Millington,
Tennessee, dated May 30, 1995, TDSF #79-719, cc 82

Dear Mr. Porter:

The Tennessee Department of Environment and Conservation (TDEC), Division of Superfund (DSF) Memphis Field Office (MFO) has reviewed the document noted above for the NAS Memphis site, received in this office on June 1, 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,

A handwritten signature in cursive script that reads "James W. Morrison".

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

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

**COMMENTS ON NAS MEMPHIS
FOLLOW UP GRAY AREA WORK PLAN
dated, May 30, 1995**

General Comment:

In Site Specific Sampling Plans 2.1.2, 2.2.2, and 2.3.2 composite sampling is proposed for these site in order to evaluate degree and extent of contamination for removal actions. TDEC is unsure if this is the appropriate method of sampling because composite samples can either: 1) Yield a false negative of the true degree of contamination when sample is composited or, 2). Yield a false larger area of contamination than is actually present when soil is heavily contaminated. Please clarify the sampling approach proposed here.

Specific Comments:

1. Section 2.2, OI-006 Turkey Shoot Area, third bullet, page 8. Although the approach and takeoff areas of each runway are mentioned here, there is no section for the follow up DPT sampling of these areas. Is this sampling approach to be included under a separate document? Please clarify.
 2. Figure 2-2, Turkey Shoot Area (OL-006), page 9. Are the sample locations noted on map correct? TDEC was under the impression that they were in the open area to the south east of the photo. Please check for accuracy.
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