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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

October 11, 1995

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

Re: Draft Interim Measures Work Plan for SWMUs #66 and #67, Naval Air Station  
Memphis, Millington, Tennessee, RCRA Facility Investigation, April 24, 1995,  
DSF #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 Draft Interim Measures Work Plan for SWMUs #66 and #67 for the NAS Memphis site, received in this office on April 26, 1995. The TDEC/DSF-MFO has 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  
Memphis Field Office  
Tennessee Division of Superfund

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

**TDEC COMMENTS ON THE  
INTERIM CORRECTIVE MEASURES FOR SWMU #66 AND SWMU #67  
AT NAVAL AIR STATION MEMPHIS, MILLINGTON TENNESSEE**

**General Comments:**

1. This document is unduly cumbersome due to 1.) a lack of specificity within the Work Plan itself and 2.) an inordinate amount of cross referencing to the attached appendices. Examples of lack of specificity with regard to work to be performed are the uses of words such as shall be, will be, are not expected to be, etc... TDEC prefers detail so a concise comment can be made. An example of inordinate cross referencing is section 2.4.8 titled Sampling and Analysis. This section is only three lines long and references an entire appendix.
2. This document does not segregate the individual SWMU work plans to be executed. TDEC notes that SWMU #66 and #67 have entirely different problems which require different parameters to be outlined. This document should be divided into two distinct SWMU work plans as has been the case in all previous SWMU work plans submitted.
3. For consistency with the NCP and past documents submitted at NAS Memphis, the person titled SSHO should only be concerned with Health and Safety issues. It appears that the SSHO in this work plan has direct decisions making responsibilities on all aspects of the sampling and work to be completed on these SWMU's.
4. The HASP that is included in this document is in excess of 100 pages. This is not a site specific HASP as it should be. A site specific HASP should include the expected or anticipated hazards for that site and should be more user friendly for the workers that will be put at risk. Please keep in mind that the purpose of the HASP is to ensure the health and safety of the onsite workers, casual visitors, and local resident population, not to turn out a document for bureaucratic review. TDEC wonders how much time is MK going to allow their workers to read and understand this HASP before work begins?
- 5.. Lastly, it appears that MK is unaware that the BCT has primary oversight responsibility for these SWMU's at NAS Memphis. Nowhere in section 2.2 is it mentioned that the BCT is to be notified about work progress or difficulties. Furthermore, from the diagram on page 21, MK does not recognize EPA as having an integral part in this investigation.