UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

Carrier

DATE: December 16, 1991

SUBJECT: Review of Response to EPA Comments on the Carrier NPL Site, Collerville, Tennessee

FROM: Lee Thomas, Hydrologist
Ground-Water Technology Support Unit

TO: Beth Brown, Remedial Project Manager
North Superfund Remedial Branch

A review has been conducted to the response to EPA comments on the Carrier NPL Site, Collerville, Tennessee as requested. In general the responses appear to be acceptable with the exception of the portion on the determination of the soil clean-up goals. Carrier has proposed to conduct some modeling of the site utilizing a more sophisticated model than was utilized by EPA. As part of this modeling they propose allowing mixing and dilution over a 2,500 foot horizontal zone between the site and the Collerville Municipal Water Supply Well Field. Such a large zone is unacceptable since it allows for the degradation of the intervening portion of the Memphis Sands which are a protected Class I Aquifer under the EPA Ground-Water Protection Strategy. The distance allowed for the horizontal delineation of the mixing zone should be at or near the downgradient portion of the waste site. In another issue, Carrier maintains that the soil clean-up goals are not attainable thorough in-situ treatment and would be difficult to remediate with ex-situ treatment. However, Carrier should also consider isolation of the contaminated soil zone, since such a method may be the most efficient method of protecting the Memphis Sand.

We recommend that these outstanding issues be resolved prior to any additional work at the site, since they may have a substantial impact on the modeling and selection of remedial alternative. If there are any questions, please contact me at x 3866.

10663345

Printed on Recycled Paper