STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
2500 Mt. Moriah, Suite E-645
Memphis, Tennessee 38115-1511

August 3, 1992

Ms. Beth Brown
Remedial Project Manager
North Site Management Section
United States Environmental Protection Agency
345 Courtland St., NE
Atlanta, Georgia 30365

Re: Carrier, Collierville Site, TDSF # 79-552

Dear Ms. Brown:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Draft Record of Decision for the Carrier Site in Collierville, Shelby County, Tennessee received in this office on 7/9/92.

The cart for this site seems to be placed slightly ahead of the horse because the TDSF, MFO received the Final Feasibility Study for the Site on July 16, 1992. We have yet to make comment on this document. Unless additional significant changes have been made in the Final FS that were not already addressed in the ROD comments, TDSF does not foresee any major difficulties.

TDSF does consider the language change for the remedy (the omission of the word wells) to be a significant difference. TDSF, MFO would not be inclined to forward a recommendation to sign a State ROD concurrence until such time as pump tests and available models demonstrate conclusively that plume capture is being effected.

As always if you have any questions or comments please feel free to call at (901) 543-6695.

Sincerely,

Wm Jordan English
Manager, Memphis Field Office
Tennessee Division of Superfund

cc: DSF, NCO file
DSF, MFO file

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CARRIER SITE
Collierville, Shelby County, Tennessee
COMMENTS ON
Draft Record of Decision
Draft dated June 24, 1992
TDSF Site # 79-552

GENERAL COMMENTS:

The Tennessee Division of Superfund (TDSF) is in general agreement with most aspects of this draft ROD. Other than typo's and minor specific comments TDSF is most concerned with differences in wording between the selected remedy alternative from the FS and the wording of the selected remedy from the draft ROD. The major difference is that the draft ROD does not specifically mention "supplemental extraction wells". The inference is that more aggressive pumping of the existing wells may effect complete plume capture. TDSF is not certain that this can be adequately proven with all of the assumptions and uncertainty in the available models. TDSF suggests that the ROD be written with the language that was provided for the public at the hearing on April 30, 1992. TDSF is also concerned about the lead levels that remain after treatment at the effluent of the water plant. Apparently no provision has been made to monitor for this.

SPECIFIC COMMENTS:

1. Page i, next to last ¶--The word "be" should be inserted between "will_treated" in the last sentence.

2. Page ii, second bullet--the words "will be" should be inserted between "controls_placed".

3. Page 1, 1.3, 1st ¶--Clarify anomalous areas of loess deposition. Maybe the intent was to describe anomalous areas of loess occurrence due to erosional removal.

4. Page 1, 1.3, 2nd ¶--The word "thick" should be inserted between "feet_overlie".

5. Page 4, 1.3, top of page--The term "shallow streams on the top of the clay layer" is technically incorrect and misleading. The term "sub-surface channels" is more correct and less confusing.

6. Page 4, 1.3, 2nd ¶--Insert "as" between "used_a".

7. Page 5, 2.1, 1st full ¶--Last sentence of this ¶ needs to be edited.

8. Page 14, 5.1, 5th ¶--Residual concentrations should be provided. The determination of "low" represents a judgement call that the reviewer and public should informed more completely about.

9. Page 15, Figure 5-2--The 10^3 contour around boring B-27 appears highly subjective. More control should be provided to rationalize drawing the contour in this fashion.

10. Page 15, Figure 5-2--Under the remedy selected soils in the "spill areas" will be remediated using soil vapor extraction and treatment to levels below 533 ug/kg, levels protective of the groundwater. An area of undefined size (see previous comment) is located at boring B-27 that has levels above 1000 ug/kg. Is any consideration being given to addressing this "source"?

11. Page 21, 1st ¶--Strike "of" or remove parentheses.

12. Page 25, 6.3, 1st ¶--It might be useful to include the highest vinyl chloride concentration observed on the Site to date.

13. Page 25, 6.3, last ¶--"hazardoussubstances" should be two words.

14. Page 31, 6.4, 3rd ¶--As long as some postulation is made regarding the lead source at the Site, it should also be mentioned (as it was in the RI document) that lead concentrations observed are possibly the result of leaching due to lowered pH from organic solvent degradation.

15. Page 33, 6.7--Was an uncertainty study done?

16. Page 39, 7.4--The FS selected remedy presented at the public hearing on 4/30/92 stated "...Treatment at Water Plant 2 and Supplemental Extraction Wells/Treatment/Discharge" but the language in the ROD mentions no wells. See general comments.

17. Page 48, 9.0, 1st ¶--The alternative selected is incorrectly described as Alternative 4B. It should be 4A.