

# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 222



OW-3 sites, 25,26

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
100 ALABAMA STREET, S.W.  
ATLANTA, GEORGIA 30303-3104

File: 541.460-D  
C.G. 222

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REC'D MAR 17 1997

March 12, 1997

4WD-FFB

Mr. Glenn Kaden, BEC  
Defense Distribution Depot Memphis  
2163 Airways Boulevard  
Memphis, Tennessee 38114-5210

SUBJ: Comments on: Lake Danielson and Golf Course Pond Risk Assessment

Dear Mr. Kaden:

The U.S. Environmental Protection Agency (EPA) Region IV has reviewed the above referenced document and has the following comments:

A. Ecological


- 1) Given the fact that chlorinated pesticides are present, an assessment endpoint such as eggshell thinning in piscivorous birds should have been chosen. Nowhere was this discussed.
- 2) The region 4 sediment screening values should have been used rather than the Hall and Suter numbers. The Suter numbers are derived from literature value and the authors have not provided details of their calculations.
- 3) The text mentions removal of fish from the lake. This may be appropriate, but the procedure for ecological risk assessment presented in the region 4 guidance should be followed.

B. Human health

- 1) How was the epc for fish tissue determined? There was only one indication that it might be based on sampling. This occurs on page 8-1 in the uncertainty analysis. This is highly suspect. The fact that very little data was presented with this risk assessment causes me to question its value.
- 2) The way the ra was organized suggests that the writer was trying to hide something.

If you have any questions please contact me at 404.562.8552.

Sincerely,



Dann Spariosu, Ph.D  
Remedial Project Manager

cc: Jordan English, Tennessee Department of Environment & Conservation

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