



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 108



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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

RECEIVED
APR 28 1995
DDMT-DE

April 28, 1995

Commander
Defense Distribution Depot Memphis
Attn.: DDMT-WP (Mr. Frank Novitzki)
2163 Airways Blvd.,
Memphis, Tennessee 38114-5210

Re: DDMT Generic Quality Assurance Project Plan, Draft Final, February 1995,
TDEC/DSF #79-736, cc 82

Dear Mr. Novitzki:

The Division of Superfund (DSF) Memphis Field Office (MFO) has reviewed the Generic Quality Assurance Project Plan for DDMT, received in this office on 2/27/95.

Pursuant to the intent of the Federal Facilities Agreement (FFA), the Tennessee Department of Environment and Conservation (TDEC) is providing the attached comments. Should you have any questions or concerns regarding this review please call me at (901) 368-7958.

Very truly yours,

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

c: TDEC/DSF, NCO, Clint Willer, file
TDEC/DSF, MFO, file
Martha Berry
United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

**COMMENTS ON DDMT GENERIC
QUALITY ASSURANCE PROJECT PLAN
DRAFT FINAL, FEBRUARY 1995**

General Comment:

To date, this is the most complete, highly organized, well thought out, and easily read document that has come across my desk. **Good Job!**

Specific Comment:

1. Section 2.2.1, Contractor Work Group, page 2-1.
Two (2) key personnel, the risk assessor and the RD engineer, appear to be missing from the work group. TDEC feels that their expertise and input early on in the RI process is highly valuable and may save money in the long run.
2. Section 2.2.2, Laboratory Work Group, page 2-3.
Add "surface water and sediment samples" as additional media being analyzed.
3. Section 3.2.2.1, Level 1 - Field Surveys, page 3-2.
Add the words "in soils." to end of last sentence in the first paragraph.
4. Section 3.2.2.3, Level 3 - Laboratory Analyses, page 3-6.
In the first sentence of the first paragraph, the word should be "action" instead of "reaction".
5. Section 5.1.2, Groundwater Sampling Procedures, page 5-1.
TDEC suggests that ground water elevation data be obtained in a limited time frame and not as the wells are individually sampled over a thirty (30) day time period. The reason for this is to create a snap shot in time as to ground water flow directions. As you may or may not be aware, atmospheric pressure on well head elevations can be considerable. Variation of as much as one (1) foot in well head elevations have been noted with passages of air masses. Also if rain events occur during the thirty day sampling window, well head elevations can be affected.
6. Section 5.4.2.5, Well Design, Well Riser and Screen, page 5-12.
TDEC suggests including a contingency for alternate well construction materials in case DNAPL concentration are encountered or if contaminant levels that could degrade PVC well materials are encountered.

7. Section 5.4.2.5, Well Design, Bentonite Seal and Grout, page 5-14.
TDEC believes that ESD now suggests using pure bentonite for grouting. Please verify and correct if applicable.
8. Section 5.4.2.5, Field Logs, page 5-16.
 1. Page is off alignment photo copied.
 2. Under Final Logs subsection, please clarify what is meant by logs will be edited for inclusion into final report. For completeness, TDEC suggests that, along with the edited version of the field log, an appendix be included with a photo copy of the original unedited field log.
9. Section 5.4.2.5, In-Situ Permeabilities, page 5-17.
This section should either describe and/or reference the types of "appropriate slug testing methods". Will the pneumatic slug testing method be used in the deep wells where highly transmissive zones may be located?
10. Section 5.4.2.9, Decontamination Procedures, pages 5-17, 18, 19.
TDEC believes ESD suggests using organic free water as opposed to using only DI water. Please verify and correct if applicable.
11. Section 5.5.1, Gamma-Gamma or Acoustic Velocity Logs, page 5-20.
 1. Paragraph beginning with "Although MW-36" is awkward, specifically as to its appropriateness in the QAPjP, please edit.
 2. If the gamma-gamma method is to be employed, then an addition or modification to the HASP may be in order due to the potential of exposure to gamma radiation. Please verify and correct if applicable.
12. Section 7.0, Table 7-2, Target Compound List and Reporting Limits, pages 7-4, 5, 6, 7, 8, and 9.
 1. Are the reporting limits to be SQL's, PQL's, IDL's, etc., please clarify.
 2. Are all reporting limits below MCL's? If not, please modify.
13. Section 8.1 Level 1 - Field Survey Data, page 8-1.
Extreme or spurious instrument readings must be documented in field log for completeness. Explanation or rationale for their exception must also be documented.
14. Section 8.4 Level 4 - Laboratory Analyses, page 8-5.
Misspelled word: "examlle" should be "example".

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE