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#### THE MEMPHIS DEPOT TENNESSEE

# ADMINISTRATIVE RECORD COVER SHEET



REFER TO

DDMT-DE

164

DEFENSE LOGISTICS AGENCY

DEFENSE DISTRIBUTION DEPOT MEMPHIS 2163 AIRWAYS BOULEVARD MEMPHIS, TENNESSEE 38114-5210



{JUN 1 2 1996

MEMORANDUM TO MR. JULIAN SAVAGE, CEHNC-PM-MD

SUBJECT: Comments on Concept Design Submittal, Groundwater Interim Remedial Action, May 1996

Please find enclosed comments on the Groundwater Interim Remedial Action Concept Design Submittal.

#### General Comments:

- Change T.E. Marxson to T.E. Maxson throughout document.
- b. Control System Prefer automatic control to manual control of the well water level. With four (4) control points and a electric valve positioner, pump output can be stepped automatically down to shut off with manual over-ride provisions. Also, please consider a flow switch for automatic pump shut off and as a positive indication of flow and pump "on" indication (provides redundancy when used in conjunction with the turbine flowmeter and pressure gauge). Use of auxiliary contacts on a magnetic starter as an indication that a pump is running is indirect and only indicates starter closure, not pump operation.
- c. Flow Control Valve A single-ported globe-style valve with linear flow characteristics would perform better over both flow ranges than the ported V ball valve.
- d. Wellhead Construction VOC vapors need to be vented to atmosphere, but this will probably require coordination with the Memphis/Shelby County Health Department.
- e. The power and instrumentation system should be provided with lightening surge suppression and high and low voltage protection. Please provide the proper equipment to insure low maintenance and uninterrupted operation of the wells.

- f. Turbine flowmeter and associated piping Without manufacturer cut sheets it is not easily determined if all design requirements are being met in the confined space of the vault. In general, specific upstream and downstream requirements exist for accurate flow measurements such as ten pipe diameters upstream when used in combination with flow straightening elements. Is this the best type of flow measuring device for the type of service, reliability, ease of replacement, economy, calibration etc.?
- g. Make every effort NOT to place wells and vaults in yards on Rozelle. Since you have discussed moving RW-2 north by about 200 feet, why not go on up to the edge of TVA access (if clearances allow) or into street. BE AWARE THAT PEOPLE DO LIVE ON ROZELLE AVENUE. ALL EQUIPMENT AND WORK MUST BE PLACED AND ACCOMPLISHED IN SUCH A WAY AS TO DIMINISH IMPACT ON THEIR PROPERTY AND LIVES.

#### Specific Comments:

- a. Page 1-1, Project Background, 1st paragraph: Dunn Field is 68.63 acres (round up to 69, if necessary).
- b. Page 1-3, Hydrogeology and Site Characterization, 3rd paragraph, last sentence: May want to change "has" to "had" in describing extent of groundwater contamination. We have now determined the western extent with the monitoring wells described in the 4th paragraph.
- c. Page 1-5, 1st complete paragraph, last sentence: Not a complete, understandable sentence. Try: "In 1992, EPA placed DDMT on the NPL because of the 58.06 score as determined by the Hazard Ranking System Scoring Package, which was conducted because of requirements under CERCLA Section 120(d)(2)."
- d. Page 2-1, Design Criteria, 1st paragraph, last sentence: Table 2-1 is cited as both seasonal flow rates and design basis of wells. However, the table does not give seasonal flow rates and is labeled "Well Design Basis."
- e. Page 2-4, Provisions to Enhance Operations and Maintenance, 3rd paragraph, 3rd sentence: Shouldn't sentence read, "Should piping be disconnected for maintenance or repair, these constituents may volatilize posing a safety hazard to maintenance personnel."
- f. Page 3-1, Ditch Crossing, 1st sentence. Change sentence to read: "...may require that drainage ditches be crossed."
- g. Page 5-2, Provisions to Enhance O&M, 2nd and 3rd paragraphs: Repeated word for word from Page 4-3, Provisions of Enhance O&M. Is this correct?

h. Figure 6-1: DDMT has concerns that 25 days to obtain jack and bore permits from the railroad may not be sufficient. Also, when will you obtain drilling permits from Memphis/Shelby County Health Department as well as permits to stop traffic on Person Avenue in order to lay piping to sanitary sewer?

CHRISTINE E. KARTMAN

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Chief

Environmental Protection and Safety Office

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