



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 243



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File:

C.G. 541.460.F

5/1/97

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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-845, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115-1520

April 30, 1997

Commander
Defense Distribution Depot Memphis
ATTN.: DDMT-DE (Mr. Glenn Kaden)
2163 Airways Blvd.
Memphis, Tennessee 38114-5210

RE: Groundwater Interim Remedial Action (February 1997): 50% Drawing Submittal; Parts I & II, Design Narrative and 50% Specifications; and Part III Design Calculations for Defense Depot Memphis, Tennessee, TDEC/DSF #79-736, cc 82

Dear Mr. Kaden:

The Tennessee Division of Superfund, on behalf of the Tennessee Department of Environment and Conservation (TDEC/DSF), reviewed the above-referenced documents received at the Memphis field Office (MFO) on February 18, 1997.

Pursuant to the DSMOA and FFA, TDEC/DSF is providing the attached comments, most of which were provided by Mr. Obie Nkpa of the Division's Technical Section in Nashville. If any comment does not require a replacement page insert owing to revisions, a written response to that comment will be sufficient. Should you have any questions or concerns regarding this review please call me at (901) 368-7957.

Very truly yours,

Terry R. Templeton, P.G.
Project Manager
TDEC/DSF-MFO

c: TDEC/DSF, NCO - file
TDEC/DSF, MFO - file
Dann Spariosu
United States Environmental Protection Agency
Region 4, Waste Management Division
100 Alabama Street, SW
Atlanta, GA 30303

TDEC/DSF COMMENTS ON THE
Groundwater Interim Remedial Action, Parts I, II and III and Drawing Submittal
for
Defense Distribution Depot Memphis
TDSF #79-736 cc:82

GROUNDWATER INTERIM REMEDIAL ACTION SUBMITTAL (FEBRUARY 1997)

GENERAL COMMENTS

1. The format of the documents, especially Parts I and II, is confusing and hard to follow. TDEC/DSF suggests the use of tabbing as well as a clearer format for section labeling, etc. In addition, accurate, sequential page numbering should be employed.
2. Is there any understanding with the City of Memphis sewerage personnel that the groundwater pumped will be treated at their facility? If not, please coordinate anticipated waste strength and flow regime, and document agreement.
3. Typographical/numbering/lettering errors are excluded from comments.

SPECIFIC COMMENTS

50% Drawing Submittal

- SHEET A-1: Exterior illumination is not shown; please correlate with specification section 13121-2.3 I.
- SHEET M-1: If depressions are profound within the area, check that all FP-XX are above the flood plain elevations required by local code before assigning the 6'-0" height as standard.
- SHEET P-2: Include railroad undercrossing detail (separate sheet), and relate to specification section.

Parts I and II Design Narrative and 50 Percent Specifications

SCHEDULE ASSUMPTIONS:

Experience has shown that railroad permitting usually takes longer than anticipated (in this case 4 to 6 weeks) if there is no prior detail meeting.

PRE-SECTIONS:

Remember to include an index of sections in the final document for easier determination of what is missing or not covered.

TDEC/DSF COMMENTS ON THE
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SECTION 01010:

If the temporary storage tank is not existing it should be outlined under 1.4 "Sequence of Work." Subparagraph 1.4.2.3 tends to suggest it is existing but the plan document doesn't show it. If so, will the tank be sampled before draining following notice to proceed (1.4.2.3) or is there going to be an equipment blank prior to the tank being filled by RW 3 thru 9?

Subparagraph 1.4.2.5 actually refers to six wells as stated in "sequence 3." However, should all thirteen wells that will exist at this time actually be sampled?

Should the end of subparagraph 1.4.8 read "ENGINEER and OWNER" instead of "ENGINEER" since 48 hours as opposed to 72 hours is stipulated?

SECTION 01090:

Under 1.11.2.2, Safety & Health manager and site Safety & Health officer(s) should be present at the PreCon if related issues might be brought up.

Under subparagraph 1.19.2 include "at a minimum the log of visitors to the site shall be furnished to the owner at or before the following (morning) shift."

SECTION 01300:

Under subparagraph 3.8 include "photocopy of stamp with authorized signature shall be made available to the owner before the first submittal is processed."

SECTION 01310:

Under subparagraph 3.4, it is the understanding that the contractor is not required to submit a project schedule in any form at the PreCon. Please confirm or amend as appropriate.

SECTION 01500:

Under subparagraph 1.4.1, there is the need to expand or elaborate on dust control measures.

SECTION 02222:

Require that the contractor be aware of and strictly comply with the current changes to the confined space regulation for manholes.

SECTION 02226:

This will most likely be a subcontractor job and therefore should be in the plan document and in the detail.

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SECTION 02670:

Include a subparagraph 1.2.3 that discusses measurement and payment with respect to abandoned wells (see reference in subparagraph 1.7).

Under subparagraph 2.5 and other sections that relate to it, specific issues or comments relating to engineering design will depend on actual locations of the wells.

SECTION 13121:

Under 2.3 I, show exterior illumination on plan sheet A-1. If structure is not designed verify that manufacturer has Compliance Report that is furnished to the Building Code Congress.

SECTION 13401:

Reiterate at the beginning of the section whether all wells will have complete instrumentation and control as detailed here. It appears that only two wells are connected through to the main control.

Under 2.5 P, should the color type for Inscription(s) "ON & OFF" for OO Tag Function be reversed, i.e., green for ON and red for OFF? If so, revise color type for OOA & SS Tag Functions accordingly, and correlate with 2.5 Q.

Under 2.6 C, the pressure gauge capacity and other data is missing; please expand gauge characteristics as appropriate.

Under subparagraph 2.8, please indicate the quantity for "Manual loading station."

Under 3.4.C.1.g, please clearly specify the cost unit, i.e., per service personnel, etc.

SECTIONS 13424 & 13425:

If these are supplements to section 13401 then they may need thorough correlation, delineation, revision and correction; e.g., the accuracy value of the pressure gauge on page 5 of 13425-PI makes that on page 5 of 13401 very insensitive.

SECTION 15060:

Under subparagraph 3.14, "15260" should read "15250" unless there are many insulation sections, each for a different environment.

Under Supplement, Piping Schedule, Page 1, should the listing of piping material type "SST" specified for exposed location be changed to "STL" to correlate with Brian Roche's memo dated February 14, 1997 (unless this pipe segment is the aboveground portion of the drop pipe)? Also cross-check whether to circle number "-03" of section 15060 Piping-General, Page 26, and confirm that carbon steel specification will not be part of the piping schedule for this project.

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE