27 0

File: 541.460.000n
C.G.

THE MEMPHIS DEPOT
TENNESSEE

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 27

27 1

File:
C.G. 541.460 d

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Memphis Environmental Field Office
2500 Mt. Moriah, Suite E-645
Memphis, TN 38115-1511

July 22, 1992

Ms. Allison W. Drew
Remedial Project Manager
Department of Defense Remedial Unit
RCRA and Federal Facilities Branch
United States Environmental Protection Agency
345 Courtland St., NE
Atlanta, Georgia 30365

Re: Defense Depot, Memphis Site, TDSF # 79-736

Dear Ms. Drew:

The Tennessee Division of Superfund (TDSF), Memphis Field Office has reviewed the Draft-Final Interim Remedial Measures Work Plan for the Defense Depot dated December, 1991 and received in this office on 5/19/92.

The Division regrets the delay in providing these comments to you. If anything needs clarification or I can help in any way please call at (901) 543-6695.

Sincerely,

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

Enclosure

cc: Ronnie Bowers, TDSWM
TDSF, NCO file
TDSF, MFO file

DEFENSE DEPOT
INTERIM REMEDIAL MEASURES
WORK PLAN
COMMENTS
for
PLAN DATED DECEMBER 1991

GENERAL COMMENTS:

The Tennessee Division of Superfund has reviewed the EPA comments for this work plan, and is in general agreement with those comments. TDSF is specifically in agreement with EPA regarding the description of this plan as a pump test work plan. Interim Remedial Measures would follow and be consistent with pump test results.

SPECIFIC COMMENTS:

1. Page 2-1, 2.1, 1st ¶—The Memphis Sand is part of the Claiborne Formation. I believe this should have read "the Jackson/Upper Claiborne Formation".

2. Page 2-8, 2.4, 1st bullet--The coincidence of the plume "hot spots" for both metals and solvents suggests that either the wastes are co-deposited or that solvent effects have concentrated the metals. Variations of plume boundaries may indicate differential solution or migration of the contaminants.

3. Page 2-8, 2.4, 2nd bullet—I thought that large concentrations of acetone were discovered in the downgradient Memphis Sand well.

4. Page 3-6, 3.3.2, 1st ¶--TDSF upon advice from EPA, ESD suggests the use of larger, 8-8½" ID augers. This would facilitate proper construction of the well, including the tremie method, inside the augers.

5. Page 3-7, 3.3.3, 1st ¶--The Tennessee Division of Superfund believes the installation of PVC casing material is unwise. The sorption problem may not be as critical as the potential for leaching. As the pumping continues it will tend to pull higher concentrations of solvent into contact with the casing. TDSF will consider any contaminants that are encountered to be Site related. Any suggestion that trace organic contaminants are the result of leaching of PVC will have to be conclusively proven, perhaps at considerable expense. Continual contact of the solvents with PVC may also lead to failure of the casing and require installation of additional wells.

6. Page 3-7, 3.3.3, 2nd ¶--Centralizers would not be required when setting the well from within the augers. In effect, the augers act as a continually removed centralizer as the sand pack, clay, and grout are set.

7. Page 3-9, 3.3.4, 1st ¶--EPA, ESD suggests the use of pure bentonite grout at a weight of 9½ lbs./gal. instead of the cement/bentonite mixture. Dehydration can cause cracks when using cement. Also, on sites where PVC is appropriate, the heat of hydration of cement can cause problems. A cement cap would still be emplaced on top of the "cured" grout.

8. Page A-3, 3.0, 2nd ¶--It should be specified in writing that the Site Safety Manager and the Site Project Manager are separate persons, and that the Site Safety

Manager has the authority to overide the Project Managers orders if safety is being compromised.

9. Page A-14, Table 6.1--This table needs to be updated to reflect current personnel and phone numbers.

10. Page A-15, 7.1, Last ¶--I believe that safety boots should be required when involved in any intrusive activities.

11. Page A-15, 7.1, last ¶--According to CFR 1910.120 SCBA should be utilized when unknown conditions exist at any site. Invasive activities should require that, at a minimum, SCBA be available. If any persons were to "go down"as a result of encountering contaminants, persons attempting rescue would be put at severe risk.

27 4

DDRC-DW (R. D'Hondt/(901)775-6969/rd) October 25, 1991

State of Tennessee
Department of Environment and Conservation
Division of Solid Waste Management
ATTN: Mr. Ronnie Bowers
701 Broadway
Nashville, Tennessee 37219-5403

Dear Mr. Bowers:

The Defense Distribution Region Central (DDRC), Memphis site, is pleased to submit the Interim Remedial Measures Work Plan regarding the Follow-On Investigation for Defense Distribution Region Central Memphis Site. As of the September 27, 1991 Defense Depot Memphis has been designated Defense Distribution Region Central, Memphis Site. Please ensure that all files are revised to indicate this change. This document has additionally been provided to EPA Region IV, Federal Facilities Section for review. If you could review this document, and identify any areas of concern that you might have regarding this proposal it would be very helpful.

I believe this work plan will meet the goals identified during the April 25, 1991, meeting and the RI/FS review process. Should you have questions regarding this proposed scope of work, please contact me at (901) 775-6969.

Sincerely,

For LINDA B NEUBAUER
Acting Director
Installation Services

1 Encl

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE