

EnSafe / Allen & Hoshall

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N00639.AR 000349
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115-004611

July 31, 1996

Program Management Office

Shelby Oaks Plaza
5909 Shelby Oaks Dr.
Suite 201
Memphis, TN 38134
Phone (901) 383-9115
Fax (901) 383-1743

EnSafe/Allen & Hoshall Branch Offices:

Charleston
935 Houston Northcutt Blvd
Suite 113
Mt Pleasant, SC 29464
Phone (803) 884-0029
Fax (803) 856-0107

Cincinnati
400 TechnCenter Dr
Suite 301
M d, OH 45150
Phone (513) 248-8449
Fax (513) 248-8447

Pensacola
2114 Airport Blvd
Suite 1150
Pensacola, FL 32504
Phone (904) 479-4595
Fax (904) 479-9120

Norfolk
303 Butler Farm Road
Suite 113
Hampton, VA 23666
Phone (804) 766-9556
Fax (804) 766-9558

Raleigh
5540 Centerview Drive
Suite 205
Raleigh, NC 27606
Phone (919) 851-1886
Fax (919) 851-4043

Nashville
311 Plus Park Blvd.
Suite 130
Nashville, TN 37217
Phone (615) 399-8800
Fax (615) 399-7467

Dallas
10000 Mer Drive
Suite 226
Irving, TX 75038
Phone (214) 791-3222
Fax (214) 791-0405

Commanding Officer
Attn: Mark Taylor/1861MT
SOUTHNAVFACENCOM
2155 Eagle Drive
P.O. Box 190010
North Charleston, SC 29419-9010

Subject: CTO-094; NSA Memphis RCRA Facility Investigation, Millington, Tennessee

Document Transmittal — Voluntary Corrective Action Work Plan, Facility OL-006, Removal of Seven Gasoline Pits From The Airfield Apron, Revision: 1, July 31, 1996

Reference: Contract N62467-89-D-0318 (CLEAN II)

Dear Sir:

Please find enclosed one copy of the revisions to the NSA Memphis *Voluntary Corrective Action Work Plan, Facility OL-006, Removal of Seven Gasoline Pits From The Airfield Apron (Revision 1)*. As requested, copies have been distributed to the BRAC Cleanup Team (BCT) and others as shown on the attached NSA Memphis RFI Distribution List. A written response to comments for this work plan and the voluntary corrective action work plans for SWMUs 3, 7, and 18 (submitted yesterday) is also enclosed.

The attached revisions include a replacement cover and spine, replacement text, and replacements for Appendix B (Removal Specifications) and Appendix D (site-specific health and safety plan). Figures have been included in the replacement text, however, please retain the original copy of Figure 2 for use in the revised work plan. Green covers, indicating "Final" document, will be distributed upon receiving approval from the BCT.

If you have any questions or comments of a technical nature, please contact me or Robert Smith at 901/372-7962. Comments or questions of a contractual nature should be directed to Debra Blagg at 901/386-9344.

Sincerely,

EnSafe/Allen & Hoshall

By: Lawson M. Anderson, CHMM
Task Order Manager

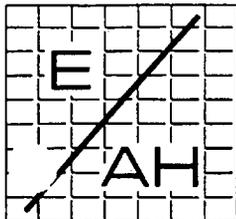
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cc: Contracts File: CTO-0094 (w/out enclosure)
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Suite 113
Mt. Pleasant, SC 29464
Phone (803) 884-0029
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Cincinnati
400 TechneCenter Dr.
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Middletown, OH 45150
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Phone (904) 479-4595
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Norfolk
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Raleigh
5540 Centerview Drive
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Raleigh, NC 27606
Phone (919) 851-1886
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Nashville
311 Plus Park Blvd.
Suite 130
Nashville, TN 37217
Phone (615) 399-8800
Fax (615) 399-7467

Dallas
Miller Drive
Suite 326
Irving, TX 75038
Phone (214) 791-3222
Fax (214) 791-0405

MEMORANDUM

DATE: July 31, 1996

TO: NSA Memphis Distribution List

FROM: Robert Smith, EnSafe/Allen & Hoshall *RS*

RE: Response to Comments — Voluntary Corrective Action Work Plans for SWMU 3, SWMU 7, SWMU 18, and the Gasoline Pits; CTO - 0094

The following is a list of changes recommended by the BRAC Cleanup Team (BCT) to the Voluntary Corrective Action Work Plans and the corresponding changes made by EnSafe/Allen & Hoshall to the reports. Unless otherwise stated, the changes were universal to all four work plans.

General Comments

- The text was revised to state that all containers used for hazardous waste disposal will be DOT approved, properly labeled, and accompanied by a container storage log. Appropriate references to the Specifications were added.
- The text was revised to state that the Contractor will be responsible for all special solid waste permit applications and BFI waste characterization package, including fees. The text was also revised to reflect that the Contractor takes possession of all non-hazardous debris generated during the site activities, and therefore is responsible for disposal. Appropriate references to the Specifications were added.
- Analytical reports will be provided to the NSA Memphis Public Works, Environmental Division in a timely manner. No changes were made to the text.
- The requirement for Site Supervisor training, CPR, and First Aid training was added to the individual Health and Safety Plans.
- Sampling rationale, as well as the rationale for analytical parameter selection, was given for each phase of sampling at each site.

- Comments on the Specifications were addressed in the text by way of references or additions where appropriate. However, changes to the Specifications cannot be made.
- The text was revised to state that all roll-off boxes used during the field activities will be lined and lockable.
- The 28-calendar day turn-around time for disposal sample analytical results was reduced to 14-calendar days.
- The text states that the Voluntary Corrective Action Report will be submitted within 2 weeks of receiving validated data. A calendar date was not set due to the possibility of unpredictable delays such as receipt of analytical data, validation reports, etc. No changes were made to the text.

Specific Comments

SMWU 3 (Revision 2)

- The text was revised to reflect that the Contractor takes possession of all non-hazardous debris generated during the site activities, and therefore is responsible for disposal. Appropriate references to the Specifications were added.
- The text was revised to state that the Government cannot have a dumpster (roll off) onsite for at least 4 weeks after notification.
- The text was revised to state that the Contractor will be responsible for all special solid waste permit applications and BFI waste characterization package, including fees.
- The text was revised to specify that the Contractor furnished dumpsters (roll offs) will be of a lockable type. Appropriate references to the Specifications were added.
- The text was revised to state that EnSafe/Allen & Hoshall will obtain permission to discharge any water generated during the removal prior to discharge to the sanitary sewer system.
- The gravel removed from the drywell will be segregated from the surrounding soil and sampled.

SWMU 7 (Revision 2)

- See responses to SWMU 3 comments.

SWMU 18 (Revision 2)

- The title, Underground Waste Tank, is the official SWMU name established during the RCRA Facility Assessment, and therefore is referenced in previous documents. No changes were made to the text.

- A container storage log will be completed prior to submitting any materials to Facility 1694. Appropriate references to the Specifications were added.
- The text was revised to reflect that the Contractor takes possession of all non-hazardous debris generated during the site activities, and therefore is responsible for disposal. Appropriate references to the Specifications were added.
- The text was revised to specify that the Contractor furnished dumpsters (roll offs) will be of a lockable type. Appropriate references to the Specifications were added.
- The Closure Report, submitted by the Contractor shall be in accordance with TDEC guidelines. The text was revised and appropriate references to the Specifications were added.
- The last sentence on Page 8, Section 4.4 was removed.

Facility OL-006 (Revision 1)

- The word "to" was added after the word "adjacent" on page 9, Pre-Closure Piping Soil Sampling.
- The words "from the" were removed after the word "soil" on page 14, 3rd paragraph.
- TCLP TPH was added to the analytical requirements presented in Table 2.
- Section 4 has been revised to include additional analytical parameters for most samples.
- Used oil specification analytical parameters will be utilized based on the amount of material remaining in the tanks, if any, and the results of the disposal samples. In the event that the disposal sample results indicate that the recovered material may be suitable for recycling under 40 CFR 279.11, additional samples will be collected of the material. No changes were made to the text.