RMT

• ENVIRONMENT • ENERGY • ENGINEERING

January 7, 2010

Mr. Joseph P. Dunn
District Manager
Morris County Soil Conservation District
16 Highview Avenue
Cedar Knolls, NJ, 07927

Subject: Dayco Corporation/L. E. Carpenter Superfund Site
USEPA ID No. NJD002168748
Response to January 6, 2010 MCSCD Comments on the Soil Erosion and Sediment Control Plan, MW-19/Hot Spot 1 Soil Remediation

Dear Mr. Dunn:

RMT, Inc., (RMT) on behalf of L.E. Carpenter & Company (LEC), is submitting this Response to Comments issued by the Morris County Soil Conservation District (MCSCD) dated January 6, 2010 regarding the *Soil Erosion and Sediment Control Plan, MW-19/Hot Spot 1 Soil Remediation* (RMT, December 2009) ("SESC Plan"). The intent of this letter is to provide the necessary written responses and appropriate figure revisions to the MCSCD comments in order to expedite the approval of the SESC Plan so that remedial activities may proceed at the site.

<u>COMMENTS</u>

1. ***Place note on silt fence detail to include additional support by tying midpoints of silt fence against chain link fencing when applicable.***

   RMT's Response: Comment is acknowledged and accepted. Sheet F7 (MW19HS1 Construction Details) has been revised to reflect the change to the silt fence detail.

2. ***Close perimeter controls (silt fence) by continuing proposed line along Ross Street to the intersection with proposed egress onto Ross Street.***

   RMT's Response: Comment is acknowledged and accepted. Sheet F5 (MW19HS1 Construction Site Layout) has been revised to show the silt fence continuing along Ross Street to the intersection of the temporary construction site entrance/exit. Because of a slight proposed adjustment to the alignment of the temporary construction site entrance/exit with

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CREATING BALANCE℠

281857

Ross Street, proposed silt fencing will extend approximately 50 feet to the east of the entrance/exit as shown on Sheet F5 (see response to Comment 3).

3. ***Modify tracking pad alignment/dimension so as to address "off-site disposal truck traffic" and "onsite material handling truck flow" the latter is indicated perpendicular to the pad. The goal is to achieve 50 ft. of interface of traffic.***

RMT's Response: Comment is acknowledged and accepted. Sheet F5 (MW19HS1 Construction Site Layout) has been revised to show the temporary construction site entrance (tracking pad) aligned more parallel to the fence along Ross Street (50-foot length). The "on-site material handling truck flow" path has been modified to show that it will not cross the construction site entrance/exit (tracking pad). This will reduce the amount of sediment accumulation on the tracking pad and potential for sediment to be tracked onto Ross Street.

4. ***Provide an explanation for sheet F6 symbol indicating "Final Stabilized Area per NJDEP Requirements (permanent seeding)". This area includes paved parking areas and paved traffic lanes. Does this area require removal of paved surfaces, stabilization, etc. If so, modify perimeter controls (silt fence) to address additional soil disturbance. Explain discrepancies between NJDEP final stabilization on sheet F6 and MCSCD permanent stabilization on Sheet F5.***

RMT's Response: Comment is acknowledged and accepted. Sheet F6 (Final Grade and End Use Plan) has been revised to show only the current vegetated areas and area within the Building 9 demolition/limits of construction) being stabilized per MCSCD permanent stabilization requirements. The existing paved surface immediately North of Building 8 and Building 16 will not be removed as part of the remedial construction. Any accumulated sediment on this paved surface will be properly cleaned during and at the conclusion of all remedial activities.

Sheet F6 has been revised to reference the MCSCD permanent stabilization requirements outlined on Sheet F5.

5. ***Provide a calendar for the sequence of construction indicating the installation of conservation practices and the time period within the overall scheme of remediation. (i.e.; Install tracking pad ...day 1, install silt fence ...day 2, permanently stabilize site day 45)***

RMT's Response: A calendar for the construction sequencing for the remediation including the installation of conservation practices has been included as an attachment to this letter.

Sincerely,

RMT, Inc.

David B. McKenzie
Senior Environmental Specialist

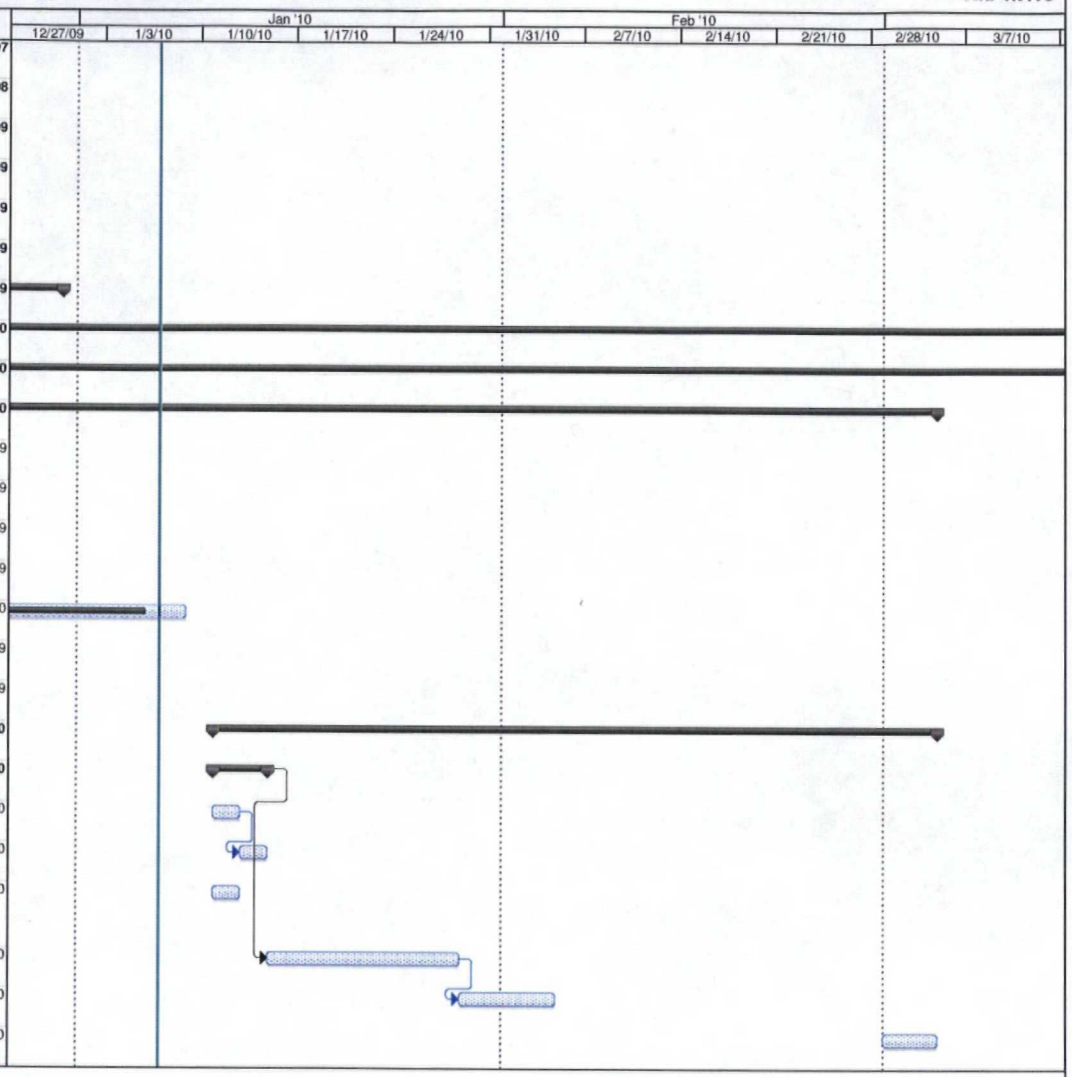
Attachments: Revised SESC Drawings F1, F5, F6, and F7
Proposed Construction Schedule

cc: Patricia Simmons-Pierre – USEPA
Ernie Schaub - LEC (SharePoint)
Nicholas Clevett - RMT
Central File

Dayco Corporation/L. E. Carpenter & Company ~ Borough of Wharton, Morris County, NJ
Master Project Schedule

USEPA ID No. NJD002168748
Thu 1/7/10

ID	Task Name	Duration	Start	Finish
1	**SOURCE REDUCTION**	**918 days**	**Fri 4/16/04**	**Wed 10/24/07**
19	**POST REMEDIAL MONITORING PLAN [PRMP] IMPLEMENTATION**	**726 days**	**Fri 7/1/05**	**Sat 4/12/08**
115	**QUARTERLY MONITORING AND REPORTING**	**949 days**	**Mon 2/27/06**	**Wed 10/14/09**
151	**WETLAND AREA [WHARTON ENTERPRISES] MONITORING AND REPORTING**	**935 days**	**Tue 5/30/06**	**Fri 12/25/09**
171	**NJDEP LEAD REMEDIAL INVESTIGATIONS (RI)**	**899 days**	**Mon 2/27/06**	**Thu 8/6/09**
187	**LEAD AGENCY CHANGE, UAO & SOW**	**339 days**	**Fri 4/18/08**	**Thu 8/6/09**
198	**RA WORK PLAN ADDENDUM**	**106 days**	**Thu 8/6/09**	**Wed 12/30/09**
203	**RA WORK PLAN ADDENDUM IMPLEMENTATION**	**440 days**	**Mon 11/17/08**	**Thu 7/22/10**
204	**MW-30 AOC**	**179 days**	**Mon 11/16/09**	**Thu 7/22/10**
209	**MW19HS1 AOC**	**340 days**	**Mon 11/17/08**	**Thu 3/4/10**
210	Pre-Demolition Surveying	2 days	Wed 1/14/09	Thu 1/15/09
211	Bldg 9 Demolition Assessment, Abatement & Permitting	267 days	Mon 11/17/08	Tue 11/24/09
212	Bldg 9 Demolition	23 edays	Tue 12/1/09	Thu 12/24/09
213	MCSCD SESCP Preparation	34 days	Mon 11/2/09	Thu 12/17/09
214	Morris County SESCP review and certification	18 edays	Mon 12/21/09	Fri 1/8/10
215	NJDEP RFA for Construction Stormwater Runoff preparation	3 days	Mon 11/9/09	Wed 11/11/09
216	NJDEP RFA review and approval	30 edays	Thu 11/12/09	Sat 12/12/09
217	**MW19HS1 Soil Remedy Implementation**	**39 days**	**Mon 1/11/10**	**Thu 3/4/10**
218	**Site Preparation/SESCP Implementation**	**4 days**	**Mon 1/11/10**	**Thu 1/14/10**
219	Install Silt Fencing/Soil Erosion Control Measures	2 days	Mon 1/11/10	Tue 1/12/10
220	Clear and Grub	2 days	Wed 1/13/10	Thu 1/14/10
221	Construct Temporary Construction Entrance/Exit (Tracking Pad)	2 days	Mon 1/11/10	Tue 1/12/10
222	**Slab Removal and Excavation**	10 days	Fri 1/15/10	Thu 1/28/10
223	**Backfill Excavation/Site Cleanup**	5 days	Fri 1/29/10	Thu 2/4/10
224	**Final Grading and Hydrooseeding**	4 days	Mon 3/1/10	Thu 3/4/10



Thu 1/7/10

Task | Split | Progress | Milestone | Summary | Rolled Up Task | Rolled Up Split | Rolled Up Milestone | Rolled Up Progress | External Tasks | Project Summary | External Milestone | Deadline

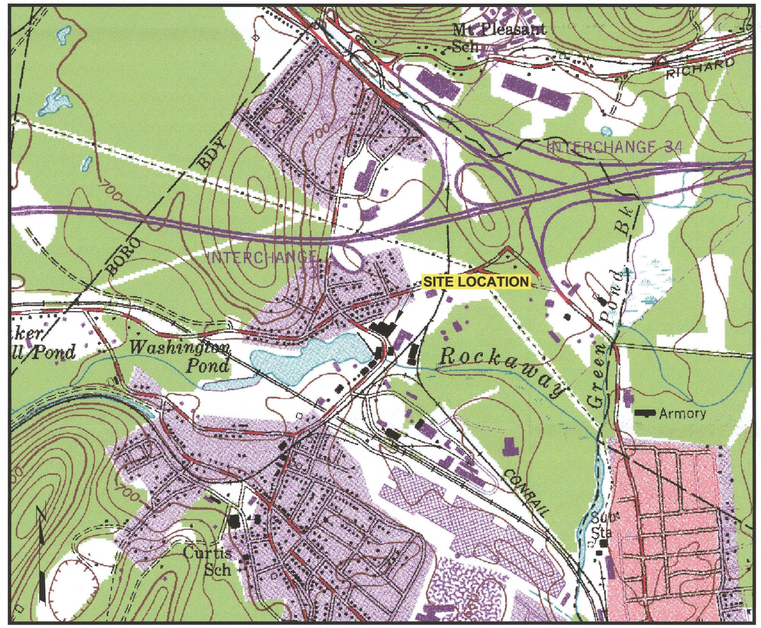
edays: elapsed days or calendar days

DAYCO CORPORATION / L.E. CARPENTER & COMPANY SUPERFUND SITE

BOROUGH OF WHARTON, MORRIS COUNTY, NEW JERSEY
MW19HS1 SOIL REMEDIATION
SOIL EROSION AND SEDIMENT CONTROL PLAN

PREPARED FOR: L.E. CARPENTER & COMPANY

PREPARED BY: RMT, INC. DATE: DECEMBER 2009



SITE LOCATION MAP

0 1000' 2000' 3000' 4000'
SCALE IN FEET

BASE MAP DEVELOPED FROM THE DOVER, NEW JERSEY 7.5 MINUTE U.S.G.S. TOPOGRAPHIC QUADRANGLE MAP, DATED 1954, PHOTOREVISED 1981.

DRAWING INDEX

FIGURE N0.	SHEET TITLE
F1	TITLE SHEET / DRAWING INDEX
F2	SITE FEATURES, TOPOGRAPHY AND SURFICIAL DRAINAGE PATTERNS
F3	FLOODPLAIN, FLOODWAY, AND WETLAND MAP
F4	USDA SOIL TYPES
F5	MW19HS1 CONSTRUCTION SITE LAYOUT
F6	FINAL GRADE AND END USE PLAN
F7	MW19HS1 CONSTRUCTION DETAILS
REV 1	REVISED SHEETS F5, F6, AND F7 (01-07-10)

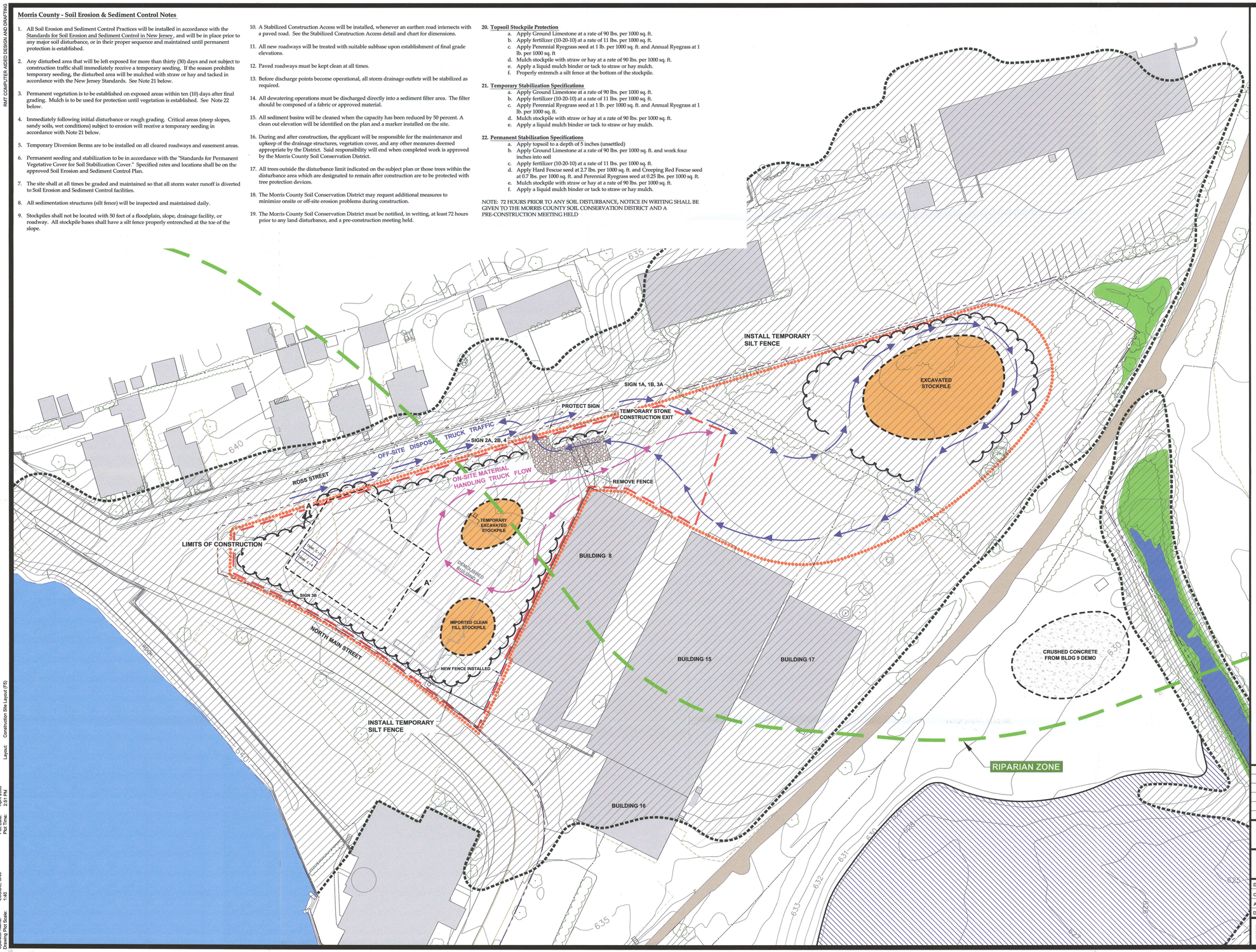
DESIGNED BY: N.J.C.	DRAWN BY: S.J.L.	CHECKED BY: D.E.O.	TITLE SHEET / DRAWING INDEX
APPROVED BY: D.E.O.		REVISIONS NO. 1. DATE 01-07-10	
DANIEL E. OMAN			DAYCO CORPORATION / L.E. CARPENTER & COMPANY MW19HS1 SOIL REMEDIATION SOIL EROSION AND SEDIMENT CONTROL PLAN WHARTON NEW JERSEY
1/7/10 N.J. PROFESSIONAL ENGINEER NO. 24GE04115700			RMT, INC. 3754 RANCHERO DRIVE ANN ARBOR MICHIGAN 48108
SCALE: SHOWN	DATE: December 15, 2009	DRAWING NO.: 6527.37.16.F1.dwg	SHEET NO.: F1 of F7

Drawing Name: J:\06527\37\6527.37.16.F1.dwg Dwg Size: 0.15 kb
Operator Name: LUCIDO, SAM Plot Date: January 7, 2010
Drawing Plot Scale: 1:1 Plot Time: 2:41 PM Layout: Title Sheet (F1)

Morris County - Soil Erosion & Sediment Control Notes

1. All Soil Erosion and Sediment Control Practices will be installed in accordance with the Standards for Soil Erosion and Sediment Control in New Jersey, and will be in place prior to any major soil disturbance, or in their proper sequence and maintained until permanent protection is established.
2. Any disturbed area that will be left exposed for more than thirty (30) days and not subject to construction traffic shall immediately receive a temporary seeding. If the season prohibits temporary seeding, the disturbed area will be mulched with straw or hay and tacked in accordance with the New Jersey Standards. See Note 21 below.
3. Permanent vegetation is to be established on exposed areas within ten (10) days after final grading. Mulch is to be used for protection until vegetation is established. See Note 22 below.
4. Immediately following initial disturbance or rough grading. Critical areas (steep slopes, sandy soils, wet conditions) subject to erosion will receive a temporary seeding in accordance with Note 21 below.
5. Temporary Diversion Berms are to be installed on all cleared roadways and easement areas.
6. Permanent seeding and stabilization to be in accordance with the "Standards for Permanent Vegetative Cover for Soil Stabilization Cover." Specified rates and locations shall be on the approved Soil Erosion and Sediment Control Plan.
7. The site shall at all times be graded and maintained so that all storm water runoff is diverted to Soil Erosion and Sediment Control facilities.
8. All sedimentation structures (silt fence) will be inspected and maintained daily.
9. Stockpiles shall not be located with 50 feet of a floodplain, slope, drainage facility, or roadway. All stockpile bases shall have a silt fence properly entrenched at the toe of the slope.
10. A Stabilized Construction Access will be installed, whenever an earthen road intersects with a paved road. See the Stabilized Construction Access detail and chart for dimensions.
11. All new roadways will be treated with suitable subbase upon establishment of final grade elevations.
12. Paved roadways must be kept clean at all times.
13. Before discharge points become operational, all storm drainage outlets will be stabilized as required.
14. All dewatering operations must be discharged directly into a sediment filter area. The filter should be composed of a fabric or approved material.
15. All sediment basins will be cleaned when the capacity has been reduced by 50 percent. A clean out elevation will be identified on the plan and a marker installed on the site.
16. During and after construction, the applicant will be responsible for the maintenance and upkeep of the drainage structures, vegetation cover, and any other measures deemed appropriate by the District. Said responsibility will end when completed work is approved by the Morris County Soil Conservation District.
17. All trees outside the disturbance limit indicated on the subject plan or those trees within the disturbance area which are designated to remain after construction are to be protected with tree protection devices.
18. The Morris County Soil Conservation District may request additional measures to minimize onsite or off-site erosion problems during construction.
19. The Morris County Soil Conservation District must be notified, in writing, at least 72 hours prior to any land disturbance, and a pre-construction meeting held.
20. **Topsoil Stockpile Protection**
    a. Apply Ground Limestone at a rate of 90 lbs. per 1000 sq. ft.
    b. Apply fertilizer (10-20-10) at a rate of 11 lbs. per 1000 sq. ft.
    c. Apply Perennial Ryegrass seed at 1 lb. per 1000 sq. ft. and Annual Ryegrass at 1 lb. per 1000 sq. ft
    d. Mulch stockpile with straw or hay at a rate of 90 lbs. per 1000 sq. ft.
    e. Apply a liquid mulch binder or tack to straw or hay mulch.
    f. Properly entrench a silt fence at the bottom of the stockpile.
21. **Temporary Stabilization Specifications**
    a. Apply Ground Limestone at a rate of 90 lbs. per 1000 sq. ft.
    b. Apply fertilizer (10-20-10) at a rate of 11 lbs. per 1000 sq. ft.
    c. Apply Perennial Ryegrass seed at 1 lb. per 1000 sq. ft. and Annual Ryegrass at 1 lb. per 1000 sq. ft.
    d. Mulch stockpile with straw or hay at a rate of 90 lbs. per 1000 sq. ft.
    e. Apply a liquid mulch binder or tack to straw or hay mulch.
22. **Permanent Stabilization Specifications**
    a. Apply topsoil to a depth of 5 inches (unsettled)
    b. Apply Ground Limestone at a rate of 90 lbs. per 1000 sq. ft. and work four inches into soil
    c. Apply fertilizer (10-20-10) at a rate of 11 lbs. per 1000 sq. ft.
    d. Apply Hard Fescue seed at 2.7 lbs. per 1000 sq. ft. and Creeping Red Fescue seed at 0.7 lbs. per 1000 sq. ft. and Perennial Ryegrass seed at 0.25 lbs. per 1000 sq. ft.
    e. Mulch stockpile with straw or hay at a rate of 90 lbs. per 1000 sq. ft.
    f. Apply a liquid mulch binder or tack to straw or hay mulch.

NOTE: 72 HOURS PRIOR TO ANY SOIL DISTURBANCE, NOTICE IN WRITING SHALL BE GIVEN TO THE MORRIS COUNTY SOIL CONSERVATION DISTRICT AND A PRE-CONSTRUCTION MEETING HELD



LEGEND

- APPROXIMATE PROPERTY LINE
- FENCE LINE
- TREES
- 630 POST-REMEDIATION GROUND SURFACE ELEVATIONS
- SAN SANITARY SEWER
- GAS GAS
- STM REGIONAL STORM SEWER LINE
- W WATER
- LIMITS OF HEALTH & SAFETY EXCLUSION ZONE
- LIMIT OF DISTURBANCE LINE
- OFF-SITE DISPOSAL TRUCK TRAFFIC
- ON-SITE MATERIAL HANDLING TRUCK FLOW
- SILT FENCE
- NJDEP FLOOD HAZARD BOUNDARY
- RIPARIAN ZONE (300 ft. FROM EDGE OF STATE OPEN WATERS
- RAILS TO TRAILS
- REGULATED WETLAND
- STATE OPEN WATERS
- NJDEP FLOOD HAZARD AREA
- RMT FLOOD HAZARD LIMIT (See Note 3; Sheet F3)

NOTES

1. BASE MAP DEVELOPED FROM TOPOGRAPHIC SURVEY PROVIDED BYJAMES M.STEWART, INC. LAND SURVEYORS, DRAWING NO 2793-03.DWG, DATED 02-14-02 AS REVISED 04-10-07 (DRAWING NO. 314907REV.DWG).

N

0 40' 80' 120' 160'
SCALE IN FEET

NO.	BY	DATE	REVISION	APP'D.
5.				
4.				
3.				
2.				
1.	SJL	01-07-10	SILT FENCE / CONSTRUCTION EXIT	DBM

DAYCO CORPORATION / L.E. CARPENTER & COMPANY
SUPERFUND SITE
WHARTON, NEW JERSEY

MW19HS1 CONSTRUCTION SITE LAYOUT

DRAWN BY: SJL	DRAWING SCALE:	PROJECT NO.	J:\06527\37
CHECKED BY: DBM,NLC	SHOWN	FILE NO.	6527.37.20.F5.dwg
APPROVED BY: NLC	DATE PRINTED:	**FIGURE F5**	
DATE: December 2009			

RMT
3754 Ranchero Drive
Ann Arbor, Michigan 48108-2771
Phone: 734-971-7080
Fax: 734-971-9022

RMT COMPUTER AIDED DESIGN AND DRAFTING
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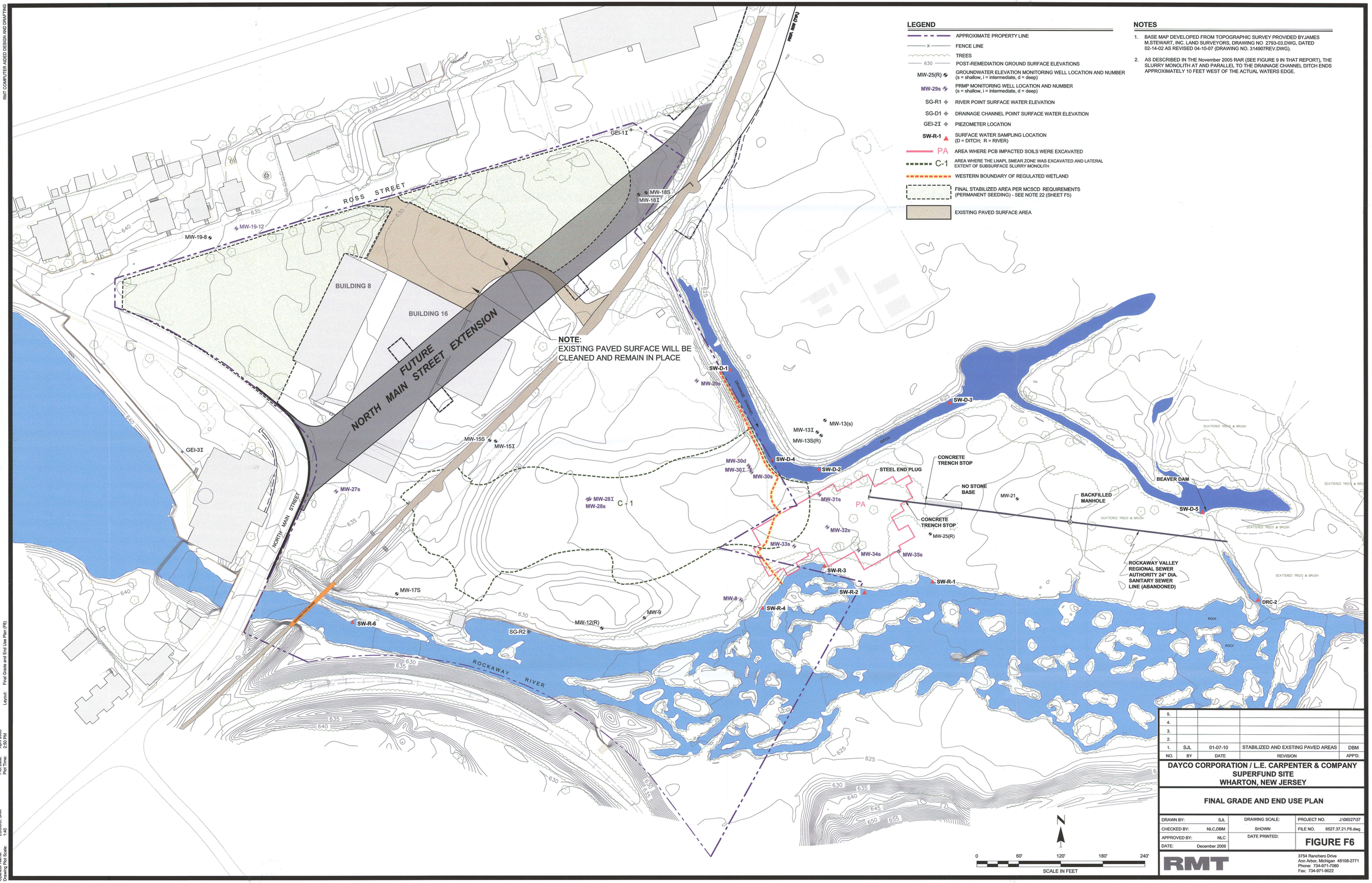
Operator Name: LUCIDO, SAM
Drawing Plot Scale: 1:40
Layout: Construction Site Layout (F5)
Dwg Size: 1.00 Mb
Plot Date: April 2008
Plot Time: 2:51 PM

RMT COMPUTER AIDED DESIGN AND DRAFTING



LEGEND

- APPROXIMATE PROPERTY LINE
- FENCE LINE
- TREES
- 630 — POST-REMEDIATION GROUND SURFACE ELEVATIONS
- MW-25(R) — GROUNDWATER ELEVATION MONITORING WELL LOCATION AND NUMBER (s = shallow, I = intermediate, d = deep)
- MW-29s — PRMP MONITORING WELL LOCATION AND NUMBER (s = shallow, I = intermediate, d = deep)
- SG-R1 — RIVER POINT SURFACE WATER ELEVATION
- SG-D1 — DRAINAGE CHANNEL POINT SURFACE WATER ELEVATION
- GEI-2I — PIEZOMETER LOCATION
- SW-R-1 — SURFACE WATER SAMPLING LOCATION (D = DITCH; R = RIVER)
- PA — AREA WHERE PCB IMPACTED SOILS WERE EXCAVATED
- C-1 — AREA WHERE THE LNAPL SMEAR ZONE WAS EXCAVATED AND LATERAL EXTENT OF SUBSURFACE SLURRY MONOLITH
- WESTERN BOUNDARY OF REGULATED WETLAND
- FINAL STABILIZED AREA PER MCSCD REQUIREMENTS (PERMANENT SEEDING) - SEE NOTE 22 (SHEET F5)
- EXISTING PAVED SURFACE AREA

NOTES

1. BASE MAP DEVELOPED FROM TOPOGRAPHIC SURVEY PROVIDED BY JAMES M.STEWART, INC. LAND SURVEYORS. DRAWING NO 2793-03.DWG, DATED 02-14-02 AS REVISED 04-10-07 (DRAWING NO. 314907REV.DWG).
2. AS DESCRIBED IN THE November 2005 RAR (SEE FIGURE 9 IN THAT REPORT), THE SLURRY MONOLITH AT AND PARALLEL TO THE DRAINAGE CHANNEL DITCH ENDS APPROXIMATELY 10 FEET WEST OF THE ACTUAL WATERS EDGE.

NO.	BY	DATE	REVISION	APP'D.
5.				
4.				
3.				
2.				
1.	SJL	01-07-10	STABILIZED AND EXSTING PAVED AREAS	DBM

DAYCO CORPORATION / L.E. CARPENTER & COMPANY SUPERFUND SITE
WHARTON, NEW JERSEY

FINAL GRADE AND END USE PLAN

DRAWN BY: SJL	DRAWING SCALE: SHOWN	PROJECT NO. J:\06527\37	
CHECKED BY: NLC,DBM		FILE NO. 6527.37.21.F6.dwg	
APPROVED BY: NLC	DATE PRINTED:	**FIGURE F6**	
DATE: December 2009			

RMT
3754 Ranchero Drive
Ann Arbor, Michigan 48108-2771
Phone: 734-971-7080
Fax: 734-971-9022

Drawing Name: J:\06527\37\6527.37.21.F6.dwg
Operator Name: LUCIDO, SAM
Drawing Plot Scale: 1:40
Dwg Size: 3.54 Mb
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Plot Time: 2:50 PM
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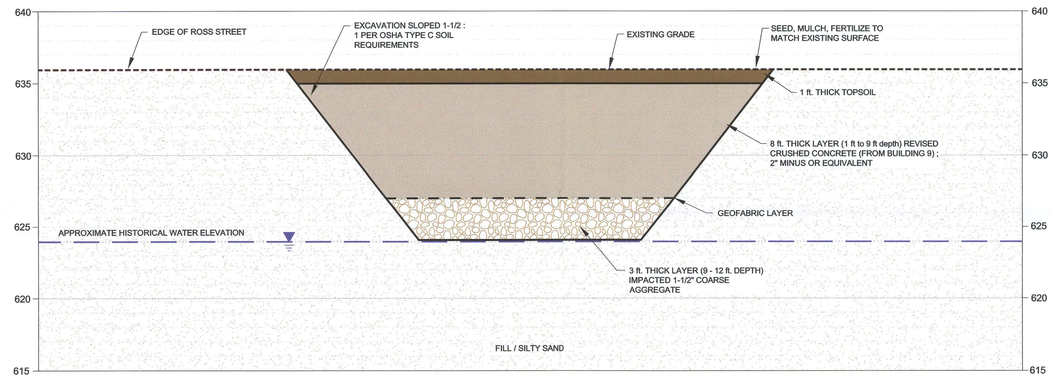


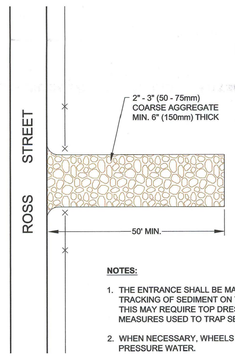
LEGEND

- APPROXIMATE GROUND SURFACE
- STRATIGRAPHIC BOUNDARY
- APPROXIMATE GROUNDWATER ELEVATION
- TOPSOIL
- REVISED CRUSHED CONCRETE
- COARSE AGGREGATE
- FILL / SILTY SAND

1 / F7

SITE PROFILE A - A' (TYPICAL)

SCALE: VER: 1" = 5'
HOR: 1" = 50'



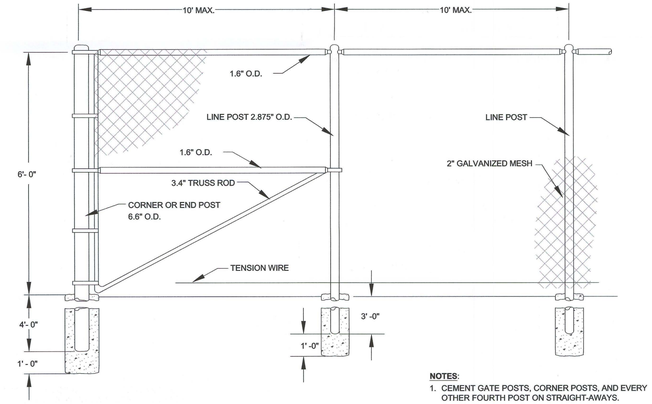
NOTES:

1. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OF SEDIMENT ON TO PUBLIC RIGHT-OF-WAY, OR ROSS STREET. THIS MAY REQUIRE TOP DRESSING. REPAIR AND / OR CLEANOUT OF ANY MEASURES USED TO TRAP SEDIMENT.
2. WHEN NECESSARY, WHEELS SHALL BE CLEANED AT DECON PAD WITH HIGH PRESSURE WATER.

2 / F7

TEMPORARY STONE CONSTRUCTION ENTRANCE / EXIT DETAIL (TYPICAL)

NOT TO SCALE



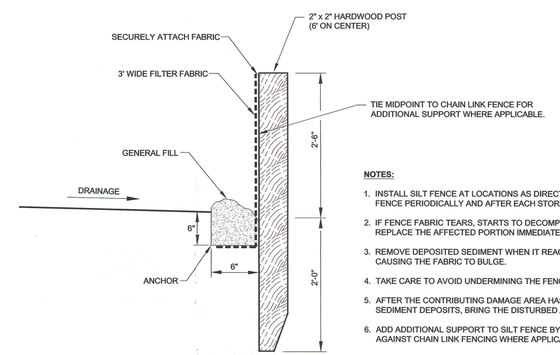
NOTES:

1. CEMENT GATE POSTS, CORNER POSTS, AND EVERY OTHER FOURTH POST ON STRAIGHT-AWAYS.

3 / F7

CHAIN LINK FENCE

NOT TO SCALE



NOTES:

1. INSTALL SILT FENCE AT LOCATIONS AS DIRECTED BY ENGINEER. INSPECT THE SILT FENCE PERIODICALLY AND AFTER EACH STORM EVENT.
2. IF FENCE FABRIC TEARS, STARTS TO DECOMPOSE, OR IN ANY WAY IS DAMAGED, REPLACE THE AFFECTED PORTION IMMEDIATELY.
3. REMOVE DEPOSITED SEDIMENT WHEN IT REACHES 33% HEIGHT POINT OR IS CAUSING THE FABRIC TO BULGE.
4. TAKE CARE TO AVOID UNDERMINING THE FENCE DURING CLEAN OUT.
5. AFTER THE CONTRIBUTING DAMAGE AREA HAS BEEN STABILIZED, REMOVE SEDIMENT DEPOSITS, BRING THE DISTURBED AREA TO GRADE, STABILIZE.
6. ADD ADDITIONAL SUPPORT TO SILT FENCE BY TYING MIDPOINTS OF SILT FENCE AGAINST CHAIN LINK FENCING WHERE APPLICABLE.

4 / F7

SEDIMENT CONTROL (SILT) FENCE

NOT TO SCALE

NO.	BY	DATE	REVISION	APP'D.
5.				
4.				
3.				
2.				
1.	SJL	01-07-10	SILT FENCE DETAIL REVISIONS	DBM

DAYCO CORPORATION / L.E. CARPENTER & COMPANY SUPERFUND SITE WHARTON, NEW JERSEY

MW19HS1 CONSTRUCTION DETAILS

DRAWN BY: SJL	DRAWING SCALE:	PROJECT NO.	J:\06527\37
CHECKED BY: JDD,NLC	SHOWN	FILE NO.	6527.37.22.F7.dwg
APPROVED BY: NLC	DATE PRINTED:	**FIGURE F7**	
DATE: December 2009			

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Phone: 734-971-7080
Fax: 734-971-9022

RMT COMPUTER AIDED DESIGN AND DRAFTING
Drawing Name: J:\06527\376527.37.22.F7.dwg
Operator Name: LUCIDO, SAM
Drawing Plot Scale: 1:20
Dwg Size: 0.15 Mb
Plot Date: April 2008
Plot Time: 2:49 PM
Layout: MW19HS1 Construction Details (F7)