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February 22, 1990

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Commanding Officer
U.S. Naval Air Station Memphis
ATTN: CDR R.G. Carpenter (5090 Code 18400)
Millington, Tennessee 38054-5000

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1D-00330

RE: RCRA Facility Assessment (RFA) Findings
U.S. Naval Air Station Memphis
EPA I. D. No. TN2 170 022 600

Dear CDR Carpenter:

The United States Environmental Protection Agency (EPA) and the Division of Solid Waste Management, Tennessee Department of Health and Environment (TDHE), have completed their review and evaluation of the information gathered during the RCRA Facility Assessment (RFA) of U.S. Naval Air Station Memphis, performed in June and July 1989.

The RFA resulted in the identification of fifty-eight (58) solid waste management units (SWMUs) and two (2) Areas of Concern (AOCs) at the facility. Twenty (20) SWMUs require no further action. Twenty-three (23) SWMUs require further investigation in the form of preliminary RCRA Facility Investigation (RFI) sampling and analysis. As the purpose of the preliminary RFI sampling is to determine which SWMUs, if any, have a confirmed release, only a verification study is necessary. Units with confirmed releases will require a characterization study under a RFI. There are fourteen (14) SWMUs for which there has been a known or suspected waste release and for which a RFI is required. There is one (1) SWMU to be covered by an approved closure plan for which the unit and any releases from it will be addressed during closure or in a post-closure permit; thus a RFI does not appear to be necessary at this unit at the present time, as the information it is designed to generate has been or will be obtained through other studies. Two (2) units have been categorized as AOCs, and may be investigated under either RCRA or the Navy's Underground Storage Tank (UST) program.

Assessment of each unit as to its potential for release of hazardous waste and/or hazardous constituents resulted in the following specific findings.

1. SWMUs for which no further action is required:
 - a. SWMU No. 10 (Demolition/Construction Debris Landfill (Eastern Portion))
 - b. SWMU No. 11 (Oiled Dirt Roads)

- c. SWMU No. 12 (Galley Disposal)
- d. SWMU No. 13 (Building 499 Grease Pit)
- e. SWMU No. 16 (Building N-94 Above Ground Waste Storage Tanks)
- f. SWMU No. 25 (Big Creek Demolition Landfill)
- g. SWMU No. 28 (Southside Sewage Treatment Plant)
- h. SWMU No. 29 (Lakehouse Sewage Treatment Plant)
- i. SWMU No. 31 (Aircraft Wash Rack at 4th Street)
- j. SWMU No. 32 (N-7 Aircraft Wash Rack)
- k. SWMU No. 33 (H-10 Incinerator)
- l. SWMU No. 34 (H-109 Incinerator)
- m. SWMU NO. 35 (1579 Incinerator)
- n. SWMU No. 36 (Northside Sewage Treatment Plant Incinerator)
- o. SWMU No. 37 (Southside Sewage Treatment Plant Incinerator)
- p. SWMU No. 54 (Dental Clinic Hazardous Waste Accumulation Point)
- q. SWMU No. 55 (Medical Clinic Hazardous Waste Accumulation Point)
- r. SWMU No. 56 (Building 352 Hazardous Waste Accumulation Point)
- s. SWMU No. 57 (Building S-183 Hazardous Waste Accumulation Point)
- t. SWMU No. 58 (Building S-360 Hazardous Waste Accumulation Point)

2. SWMUs for which preliminary RFI sampling and analysis are required:

- a. SWMU No. 15 (N-94 Underground Tank Farm)
- b. SWMU No. 17 (Building S-9 Underground Waste Tank)
- c. SWMU No. 18 (Building N-112 Underground Waste Tank)
- d. SWMU No. 19 (341 and 1648 Underground Waste Tanks)
- e. SWMU No. 20 (1594 Underground Waste Tank)
- f. SWMU No. 21 (N-10 Underground Waste Tank)
- g. SWMU No. 24 (Building N-114 Auto Hobby Shop Waste Oil Tanks)
- h. SWMU No. 26 (N-102 Battery Acid Neutralization Unit (underground tank only))
- i. SWMU No. 27 (Northside Sewage Treatment Plant)
- j. SWMU No. 30 (Park Field Waste Treatment Tank)
- k. SWMU No. 39 (Building S-74 PCB Storage Area)
- l. SWMU No. 41 (Salvage Yard No. 2)
- m. SWMU No. 43 (Building S-176 Hazardous Waste Accumulation Point)
- n. SWMU No. 44 (Building N-102 Hazardous Waste Accumulation Point)
- o. SWMU No. 45 (Building S-142 Hazardous Waste Accumulation Point)



- p. SWMU No. 46 (Building S-140 Hazardous Waste Accumulation Point)
- q. SWMU No. 47 (Building 344 Hazardous Waste Accumulation Point)
- r. SWMU No. 48 (Building S-9 Hazardous Waste Accumulation Point)
- s. SWMU No. 49 (Building 757 Hazardous Waste Accumulation Point)
- t. SWMU No. 50 (Building N-126 Hazardous Waste Accumulation Point MAG-42)
- u. SWMU No. 51 (Building N-126 Hazardous Waste Accumulation Point VR-60)
- v. SWMU No. 52 (Building N-126 Hazardous Waste Accumulation Point VP-67)
- w. SWMU No. 53 (Building N-126 Hazardous Waste Accumulation Point AIMD)

EPA and TDHE have determined the need for additional information and verification of releases at the twenty-three (23) SWMUs specified above. Condition II.A.1. of the NAS Memphis Hazardous and Solid Waste Amendments (HSWA) Permit HSWA-TN002 specifies, in part, that "...the Permittee will review all existing sources of information and develop new information related to solid waste management practices and releases at the facility...". It is our opinion that, at the present time, the characterization studies required under Condition II.A.2. are not warranted and that preliminary RFI verification studies will suffice. In the event that releases are confirmed, characterization studies under a RFI will then be required at the applicable SWMUs. We request that NAS Memphis provide EPA and TDHE with a work plan which includes a sampling program for soil, subsoils and ground water, as applicable, at the specified SWMUs. A schedule for all proposed activities must be included in this work plan. In accordance with Condition II.A.4. of Permit HSWA-TN002, we request that this work plan be submitted to EPA and TDHE within ninety (90) days of receipt of this letter.

3. SWMU for which the unit and any releases from it will be covered by an approved closure plan and, if necessary, a post-closure permit:
 - a. SWMU No. 42 (Building N-12 Interim Hazardous Waste Storage Area). Once the new NAS hazardous waste container storage facility has been completed, SWMU No. 42 will be closed in accordance with a TDHE-approved closure plan which includes both a detailed plan for investigation of the soil beneath and adjacent to the storage area and cleanup criteria for any releases identified by the investigation.



4. SWMUs for which there has been a known or suspected release and for which a RFI is required:
- a. SWMU No. 1 (Fire Department Drill Area (FDDA)). Visual evidence exists that releases have occurred from this SWMU. Long-standing operating practices resulted in uncontrolled runoff of hazardous waste and/or hazardous constituents to the environment surrounding and beneath the FDDA.
 - b. SWMU No. 2 (Southside Landfill). Large quantities of waste solvents, waste oils and oily sludges were placed in this unlined landfill over a period of twenty-eight (28) years. Releases to the underlying soil and perhaps the ground water are suspected to have occurred.
 - c. SWMU No. 3 (Building N-121 Plating Shop Dry Well). The past operating practice of disposing of metal plating wastes directly into the unlined dry well has made releases inevitable.
 - d. SWMU No. 4 (Building N-121 Plating Shop Storm Sewer and Drainage Ditch). The long-standing practice of discharging large quantities of metal plating wastes directly to the storm sewer and on to the unlined drainage ditch established a history of releases to the environment.
 - e. SWMU No. 5 (Fire Fighting Training Area). Visual evidence indicates the occurrence of releases to the surrounding environment. Past operating practices included no controls to prevent releases.
 - f. SWMU No. 6 (Building N-126 Battery Shop Storm Sewer and Ditch). By virtue of recurring discharge of battery acid wastes to the storm sewer and on to the unlined drainage ditch, substantial releases to the environment have occurred.
 - g. SWMU No. 7 (Building N-126 Plating Shop Dry Well). The past operating practice of disposing of metal plating wastes directly into the unlined dry well has made releases inevitable.
 - h. SWMU No. 8 (Cemetery Disposal Area). Ethylene oxid, waste oils, waste chemicals, transformers and capacitors are reported to have been disposed of in this unlined landfill. Releases to the underlying soil and perhaps the ground water are suspected to have occurred.



- i. SWMU No. 9 (Sewage Lagoons). Industrial waste water sludges in these two unlined lagoons have created a significant potential for releases to the underlying soil and the ground water.
 - j. SWMU No. 14 (Former Site of Building S-140 and the 7th Avenue Ditch). The long-standing practice of discharging painting wastes to the unlined 7th Avenue Ditch established a history of releases to the environment.
 - k. SWMU No. 39 (Miscellaneous Drainage Ditches in the Industrial Areas of NAS). The former operating practice of discharging industrial wastes into unlined drainage ditches resulted in substantial releases to the environment.
 - l. SWMU No. 40 (Salvage Yard No. 1). Prior sample analyses, as well as visual inspection, have verified the occurrence of waste releases at this unit.
 - m. SWMU No. 59 (Old Pesticide Shop). Pesticide releases from this unit are suspected to have occurred.
 - n. SWMU No. 60 (Northside Landfill (Western Portion)). The discovery of an abandoned tank containing hydrocarbons in this unlined landfill, which was not supposed to have received any hazardous wastes, has raised a question concerning waste disposal practices at this site and introduced the possibility of releases to the underlying soil or the ground water.
5. AOCs for which verification studies may be conducted under either a preliminary RCRA RFI or the Navy's UST program:
- a. SWMU No. 22 (S-75 Underground Fuel Tanks)
 - b. SWMU No. 23 (S-8 Underground Fuel Tank)

A Final Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan, dated November 16, 1989, has been submitted to EPA and TDHE for SWMU Nos. 1 through 9. In order to be acceptable, this document must comply with the requirements of a RCRA Facility Investigation, and will be reviewed in that light. In addition, separate RFI Work Plans dated November 1989 and September 17, 1989, have been submitted for SWMU No. 3 and for SWMU No. 59, respectively, both of which are scheduled to be closed in 1990.



These documents will also be reviewed in terms of compliance with the requirements of a RCRA RFI. The Navy has requested permission to conduct verification studies at the facility's underground waste tanks under its UST program. We find this approach to be acceptable, with the condition that the units under consideration are subject to RCRA requirements and schedules, all of which must be complied with.

It is our understanding that the Department of the Navy will revise the Revised Final Draft of the RFA to reflect the findings and recommendations of this letter. Upon completion of the revisions, copies of this document should be sent to EPA and TDHE for our records. The revised RFA will then be considered to be the final approved RFA.

Please notify Larry Fitchhorn, P.E., of EPA at (404) 347-3433 or Dale Ozier of TDHE at (615) 741-3424 within the next forty-five (45) days should you have either any additional information which may affect the findings of the RFA or any questions concerning this letter.

Sincerely yours,


James H. Scarbrough, P.E.
Chief, RCRA Branch
Waste Management Division


Tom Tiesler, Director
Division of Solid Waste
Management
Tennessee Department of
Health and Environment

cc: Paul Patterson, DSWM, Memphis
U.S. EPA, Region IV
DSWM, Nashville