



DEPARTMENT OF THE NAVY
NAVAL AIR STATION MEMPHIS
MILLINGTON, TENNESSEE 38054-5000

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Code 18300
10 JUL 1990

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. James H. Scarbrough
Chief, RCRA Branch
Environmental Protection Agency
Region IV
Waste Management Division
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Scarbrough:

Enclosed is a copy of the Draft Final RCRA Facility Investigation Work Plan, enclosure (1), for Naval Air Station Memphis, Millington, Tennessee, for your review and comments.

This work plan takes the place of our Final Draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan for SWMUs 1 through 9 dated 16 November 1989. We have incorporated the State of Tennessee's comments of their 7 February 1990 letter, enclosure (2), the comments provided during the 7 February 1990 Technical Review Meeting, and your letter dated 22 February 1990.

The point of contact for this review at this command is Ms. Tonya Barker at (901) 873-5461.

F. C. CARPENTER
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NAVAL AIR STATION MEMPHIS

Encl:

- (1) Draft Final RCRA Facility Investigation Work Plan for NAS Memphis
- (2) Response to State of Tennessee's 7 February 1990 Review Comments

Copy to:

Mr. Larry Fitchorn
EPA Region IV
Waste Management Division
345 Courtland Street
Atlanta, GA 30365

Mr. Paul Patterson
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Copy to: (Cont'd)
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Mr. Jim Crow
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The Honorable George R. Harvell, Jr.
Mayor of Millington
7930 Nelson Street
Millington, TN 38053

(Not certified mail)
Commanding Officer, Southern Division (w/o encl) ←
Naval Facilities Engineering Command (Code 11519)
P. O. Box 10068
Charleston, SC 29411-0068



RESPONSE TO THE STATE OF TENNESSEE'S 7 FEBRUARY 1990
REVIEW COMMENTS

Please refer to the state's letter of 7 February for the comments. The following numbers correspond to the state's comment numbers.

1. Three ground water monitoring wells will be installed.
2. The contents of the landfill cells will be characterized only by conducting a review of the landfill's past operation practices.
3. The contaminate source location will be determined by conducting an EM geophysics survey, soil gas monitoring, drive points, ground water monitoring, sediment sampling, surface and subsurface soil sampling.

The review of the landfill's past operation practices and the EM survey should give us some indication as to the landfill's integrity.

Eleven ground water monitoring wells will be installed which is in addition to the existing five monitoring wells. Eight will be shallow wells and three will be deep wells.

3. Four sediment samples and two suspended bedload sediment samples will be collected from the ditch. This information will be used by the USGS in modelling the impacts of storm events to mobilize potential surface contaminants released from NAS. This should account for any upgradient surge.

4. Cn is included as a sampling parameter.

5. After gridding the lagoons off and selecting the same random sampling points, we believe that the number of samples shown are appropriate to characterize the lagoons.

Both filtered and unfiltered samples will be performed for determining the presence of heavy metals in the ground water.

TOC has not been included for all ground water samples. TOC will be run on the five background ground water samples during this round of sampling.

Isopropyl alcohol will be used as appropriate when decontaminating the sampling equipment.