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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-446, PERIMETER PARK
2518 MT. MORIAH
MEMPHIS, TENNESSEE 38115

March 17, 1995

Mr. David Porter
Southern Division, Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 10068
Charleston, SC 29411-0068

Re: Draft Assembly C Site Investigation Plans, Naval Air Station Memphis, Millington,
Tennessee, RCRA Facility Investigation, January 20, 1995, TDSF #79-719, cc 82

Dear Mr. Porter:

The Tennessee Division of Superfund (TDSF) Memphis Field Office (MFO) has reviewed the Draft Assembly C Site Investigation Plans for the NAS Memphis site, received in this office on January 23, 1995. The TDSF-MFO has the following attached comments.

Should you have any questions or concerns regarding this review please call me at (901) 368-7958.

Sincerely,

James W. Morrison, P.G.
Environmental Project Manager
Memphis Field Office
Tennessee Division of Superfund

c: TDSF, NCO - Attn: Clint Willer, Director DSF, File
TDSF, MFO, File
David Williams

United States Environmental Protection Agency
Federal Facilities Branch
345 Courtland Street, N.E.
Atlanta, GA 30365

Post-It™ brand fax transmittal memo 7671		# of pages = 4
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**TDEC/DSF-MFO COMMENTS ON
DRAFT ASSEMBLY C SITE INVESTIGATION PLANS,
NAS MEMPHIS, RCRA FACILITY INVESTIGATION
JANUARY 20, 1995**

General Comment:

To date, this is the most complete, easily readable, and highly organized work plan that has come across my desk. However, TDEC has noted that some of the sampling strategies need to be revisited. Specifics are noted below.

Individual SWMU SIPs may be comprised of both general and specific comments.

SWMU 15 SIP

1. Section 2.0, Environmental Setting, page 1.
Please correct the third sentence to read "ten - 10,000 to 25,000 - gallon tanks", per Appendix A.
2. Section 3.0, Source Characterization, second para., page 8.
Please indicate what state agency gave permission to backfill site with potentially contaminated soil.
3. Section 4.3, Objective and Proposed Field Investigation, second para., page 9.
Please clarify statement regarding DNAPL detection at top of aquifer using DPT. One would naturally suspect LNAPL type contaminants at top of aquifer. (This same statement is repeated in most of the other SWMU SIPs, please correct.)

Specific comments regarding the SWMU 15 HASP are applicable to all SIP HASPs, please correct where appropriate.

1. Section 2.4, Work Zones, page 6.
Please include a general (non site specific) map showing work zones with wind direction included on the map. Also, please state how zones will be defined (e.g.: colored tape).
 2. Section 6.1, Standard Safe Work Practices, first bullet, page 8.
TDEC strongly suggests deleting the phrase "unless authorized by the Site Health and Safety Officer".
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3. Section 6.1, Standard Saf Work Practices, first bullet, page 9.
Please include accepted overhead and side working clearances.
4. Section 6.3, Selection of Personal Protective Equipment, Second para,
page 11.
Please expand on the phrase "based on best available information" when
determining appropriate level of PPE.
5. Section 8.2, Responsibilities of Site Health and Safety Officer, last para,
page 20.
Please clarify, will designated alternate SHSO have 24 hour supervisory
training?

SWMU 18 SIP in use ?

1. TDEC suggests rethinking this SWMU's proposed sampling strategy.
Since this a small UST (550 gallons), why not remove the tank and do
confirmatory sampling around the pit? The CERCLA contaminants noted
here are not very mobile. Also, if pressure testing is in order for the tank,
what about the lines?

SWMU 21 SIP

1. Section 2.0 Environmental Setting, sixth line, page 1.
Delete the words "of the".
2. See general comment under SWMU 18 SIP. Same problem, just a larger
tank.

SWMU 26 SIP

1. If this small sump unit and feeder line are going to be left in place, then
the sampling approach is more than sufficient. However, it appears the
solution would be more cost effective to remove it and do confirmatory
sampling. TDEC suggests rethinking this sampling strategy.

SWMU 27 SIP

1. No comments, looks good.
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SWMU 27 SIP

1. There are appear to be no CERCLA contaminants noted of concern here. Since used petroleum products are present, and since the pits are small (i.e. three 55 gallon drums), TDEC suggests their removal followed by confirmatory sampling. The ground water issue will need to addressed as a follow-on investigation.