

EnSafe/Allen & Hoshall
a joint venture for professional services

N00639 AR.000240
MILLINGTON SUPPACT
5090 3a
38054.000
09.01.00.0028
1D 00076

August 30, 1995

Commanding Officer
Attn: Mark Taylor (1861MT)
SOUTHNAVFACENCOM
2155 Eagle Drive
North Charleston, SC 29418

RE: *Followup Gray Area Work Plan (Revision 01)*, NAS Memphis, Millington, Tennessee;
Contract N62467-89-D-0318, Comprehensive Long-Term Environmental Action Navy
(CLEAN); CTO-094

Dear Sir:

EnSafe/Allen & Hoshall is pleased to submit two copies of the *Followup Gray Area Work Plan (Revision 01)* for NAS Memphis. All U.S. EPA and Tennessee Department of Environment and Conservation (TDEC) comments have been addressed in the document or in the attached *Response to TDEC Comments*. As requested, copies of the revised document have been distributed as indicated on the enclosed NAS Memphis Distribution List.

If you have any questions or comments, please contact me or Robert Smith at 901/372-7962.

Sincerely,

EnSafe/Allen & Hoshall



By: Lawson M. Anderson, CHMM
Task Order Manager

Enclosure

cc: Kim Reavis (0232KR), SOUTHDIV Contracts (w/out enclosure)
CTO-094 File - E/A&H Contracts (w/out enclosure)

5720 Summer Trees Drive, Suite 8, Memphis, Tennessee 38134 (901)383-9115

NAS MEMPHIS DISTRIBUTION LIST

Document Title: Followup Gray Area Work Plan (Revision 01), Naval Air Station Memphis RFI, Millington, Tennessee
Document Date: August 30, 1995
Distribution Date: August 30, 1995
Billing Code: 0094-07134 (shipping of copies to SOUTHDIV should be charged to overhead)

ADDRESS	VIA	DISTRIBUTION	COPIES
Commanding Officer Attn: Mark Taylor/1861MT SOUTHNAVFACENGCOM 2155 Eagle Drive North Charleston, SC 29418 (803) 743-0911	2nd Day—F/Ex	Mark Taylor/1861MT David Porter/18B2DP Sue Lawley/00P	<u>1</u> <u>1</u> <u> </u>
Commanding Officer Attn: Rob Williamson Public Works Engineering Naval Air Station Memphis Millington, TN 38054-5000 (901) 873-5461	Hand Deliver	Tonya Barker Rob Williamson Repositories RAB Library LCDR Archambault	<u> </u> <u>2</u> <u>3</u> <u>2</u> <u> </u>
U.S. Env't. Protection Agency Attn: David Williams Waste Management Division RCRA and Federal Facilities Branch 345 Courtland Street Atlanta, GA 30365 (404) 347-3555, Ext.2058	2nd Day—F/Ex	David Williams	<u>3</u>
TDEC—Division of Superfund Memphis Field Office Attn: Jordan English Suite E-645, Perimeter Park 2500 Mt. Moriah Memphis, TN 38115-1511 (901) 543-6695	Mail	Jordan English Jim Morrison	<u>1</u> <u>1</u>
TDEC—Division of Superfund Attn: Clint Willer 4th Floor, L & C Annex 401 Church Street Nashville, TN 37243-1538 (615) 741-5940	2nd Day—F/Ex	Clint Willer	<u>1</u>
U.S. Geological Survey Water Resources Division Attn: Jack Carmichael 810 Broadway, Suite 500 Nashville, TN 37203 (615) 736-5424, Ext.3137	2nd Day—F/Ex	Jack Carmichael (Nashville) Bill Parks (Memphis)	<u>1</u>
Memphis and Shelby Co. Health Dept. Attn: Brenda Duggar 814 Jefferson Avenue Memphis, TN 38105 (901) 576-7741	Mail	Brenda Duggar	<u>1</u>

**Naval Air Station Memphis
Follow Up Gray Area Work Plan
Response To TDEC Comments
August 30, 1995**

General Comment:

In Site Specific Sampling Plans 2.1.2, 2.2.2, and 2.3.2 composite sampling is proposed for these sites in order to evaluate degree and extent of contamination for removal actions. TDEC is unsure if this is the appropriate method of sampling because composite samples can either: 1) Yield a false negative of the true degree of contamination when sample is composited or, 2) Yield a false larger area of contamination than is actually present when soil is heavily contaminated. Please clarify the sampling approach proposed here.

Response:

Only two of the referenced Site Specific Sampling Plans are designed for removal actions and both are based on small excavation areas. Should the excavation areas extend beyond what is anticipated based on contaminant knowledge, topography, and experience, the number of composite samples will be increased accordingly to ensure adequate and representative coverage. At the third site, the Turkey Shoot Area, a 100 foot by 100 foot grid, with 10 foot by 10 foot cells, has been established, centered on the previous sample locations. Of the 100 grid squares, twenty cells will be selected by random number generation for sampling. A 5-part composite sample will be collected from each of the 20 selected grid squared. The text has been changed to clarify this.

Specific Comments:

1. Section 2.2, OL-006 Turkey Shoot Area, third bullet, page 8. Although the approach and takeoff areas of each runway are mentioned here, there is no section for the follow up DPT sampling of these areas. Is this sampling approach to be included under a separate document? Please clarify.

Response:

The follow up DPT sampling in the runway approach areas has been conducted and is discussed in the *Final Gray Area Investigation Report* (E/A&H, June 16, 1995).

2. Figure 2-2, Turkey Shoot Area (OL-006), Page 9.

Are the sample locations noted on the map correct? TDEC was under the impression that they were in the open area to the south east of the photo. Please clarify.

Response:

The suspected target area, which is where the samples were collected, is located in the transitional boundary between "old" growth and "new" growth, which can be seen in the figure. The open area to which you refer is a parking lot.