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FACT SHEET FOR NOTIFICATION AND INVESTIGATION REQUIREMENTS FOR NEW
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NAVAL AIR STATION



Naval Air Station Memphis Installation Restoration Program Fact Sheet

September 1994

This is one in a series of fact sheets informing interested residents about the environmental investigations and remedial actions at NAS Memphis. Other fact sheets will be written at appropriate points in the program and in response to public interest. Distribution is coordinated through the NAS Memphis Public Affairs Office at (901) 873-5761.

Notification and Investigation Requirements for New Sites

◆ NAS Memphis' RCRA Permit

As a facility that trains people to operate and maintain aircraft, Naval Air Station (NAS) Memphis uses hazardous materials — chemicals, pesticides, and petroleum products — in its daily operations. Using these materials generates hazardous wastes. To ensure that handling and storing of these wastes pose no threat to human health and the environment, the U.S. Environmental Protection Agency (USEPA) has permitted NAS Memphis to temporarily store them in a designated hazardous waste storage facility. This permit allows NAS Memphis to carry out the activities and operations that are part of its mission as a support and training activity.

The permit is issued under the laws found in the Resource Conservation and Recovery Act of 1976, or RCRA. Thus it is called a "RCRA Permit." NAS Memphis received its RCRA permit in September 1986.

To receive and retain this permit, NAS Memphis must:

- Prove that it handles hazardous wastes in an environmentally responsible way, and with proper care and documentation.
- Identify areas, called *solid waste management units (SWMUs)*, that may have been affected by past handling of hazardous wastes, through spills or disposal practices, at NAS Memphis. Sixty-five SWMUs were identified in the studies conducted between 1986 and early 1994.
- Investigate and, if necessary, clean up these SWMUs to standards set by the USEPA and the State of Tennessee. This is required by RCRA as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA). Site investigations at NAS Memphis began in 1983 with the *Initial Assessment Study* and have continued since then. Field work for the RCRA Facility Investigation (RFI) at NAS Memphis is scheduled to begin during the last quarter of 1994.

◆ New Sites

New sites occasionally are added to the SWMU list as the environmental program progresses, and new information is found. Sites can be discovered during field investigation, through personal contacts, or by other means. To include a new site on the SWMU list, NAS Memphis must follow specific steps set out in RCRA and HSWA. As shown in the accompanying flow chart and described below, these guidelines make sure that the site's condition is properly documented and that the regulatory agencies are aware of its existence in a timely manner.

The steps are:

1. Notifying the USEPA, in writing, within 15 calendar days of discovering a possible SWMU. The notification must include, at least, the site's location and all available information that could qualify it as a SWMU.
2. Preparing a **SWMU Assessment Report (SAR)**, also called a RCRA Facility Assessment (RFA), for each possible SWMU identified. The SAR must be submitted within 90 calendar days of the notification of discovery. The SAR must detail:
 - Location on a topographic map
 - Designation, type, and function of the unit(s)
 - General dimensions, capacities, and structural description
 - Dates the unit operated
 - A list of all the wastes that have been managed at or in the unit to the extent available
 - All available information about any releases of hazardous waste or constituents, including groundwater, soil, air, or surface water data and analysis

Based on the SAR's information, the USEPA will then decide if the site needs more study. If USEPA decides additional investigation is needed, the Navy must prepare a work plan for thoroughly assessing the site. One of the two types of work plans described below must be submitted to the USEPA after it decides more investigation is required.

- For probable releases, a **Confirmatory Sampling (CS) Work Plan** will outline the methods for determining if any release, such as a chemical spill or leak, has occurred at the site. The USEPA must receive this plan within 45 days from the station's notification that further study is needed. The CS Work Plan includes schedules and procedures for the work needed to determine whether a release has occurred.
- For known releases, an **RFI Work Plan** must be presented to the USEPA within 90 days from the station's first notification that further study will be needed. An RFI Work Plan includes schedules for carrying out specific actions to determine what materials and quantities have been released, where the contamination is, and where it could be going.

SWMU 66 RADAR FACILITY DUMP

The Radar Facility Dump is a new site to be addressed under the RCRA Facility Investigation (RFI) at NAS Memphis. It was discovered in July 1994 when SeaBees from the base were clearing a remote area to gain access to a tree that was interfering with the operation of a nearby radar facility. The site, located on the northeast side of the base between inactive Runway 18 and Building 1696 (Radar Facility), will become solid waste management unit (SWMU) 66.

The dump is located in a ravine about 8 feet deep and covers an area about 50 feet wide and 350 long. The period of operation for the dump is unknown, though a date on one of the approximately fifty 55-gallon drums dumped at the site suggests that it was used as recently as 1983. It has been out of use long enough for vegetation to cover all of the material disposed of there. The dump was used for the disposal of scrap metal, wood, and a wide variety of miscellaneous trash and debris such as wire fencing, appliances, small Freon cylinders, floor tiles, and furniture.

The site will become a SWMU because of the drums that were dumped there. Many of them have been identified as originally containing lubricating oil and several of them contained solvents. Most of the drums appear to be empty. What (if anything) they contained at the time of their disposal is unknown. For this reason, sampling will be required at the site to determine if hazardous wastes or constituents have been released. The ends of several drums have bulged out, indicating that now or in the past they contained organic vapors under pressure. Thus, before sampling can be conducted, remedial measures must be taken to ensure that the drums are empty and safe.

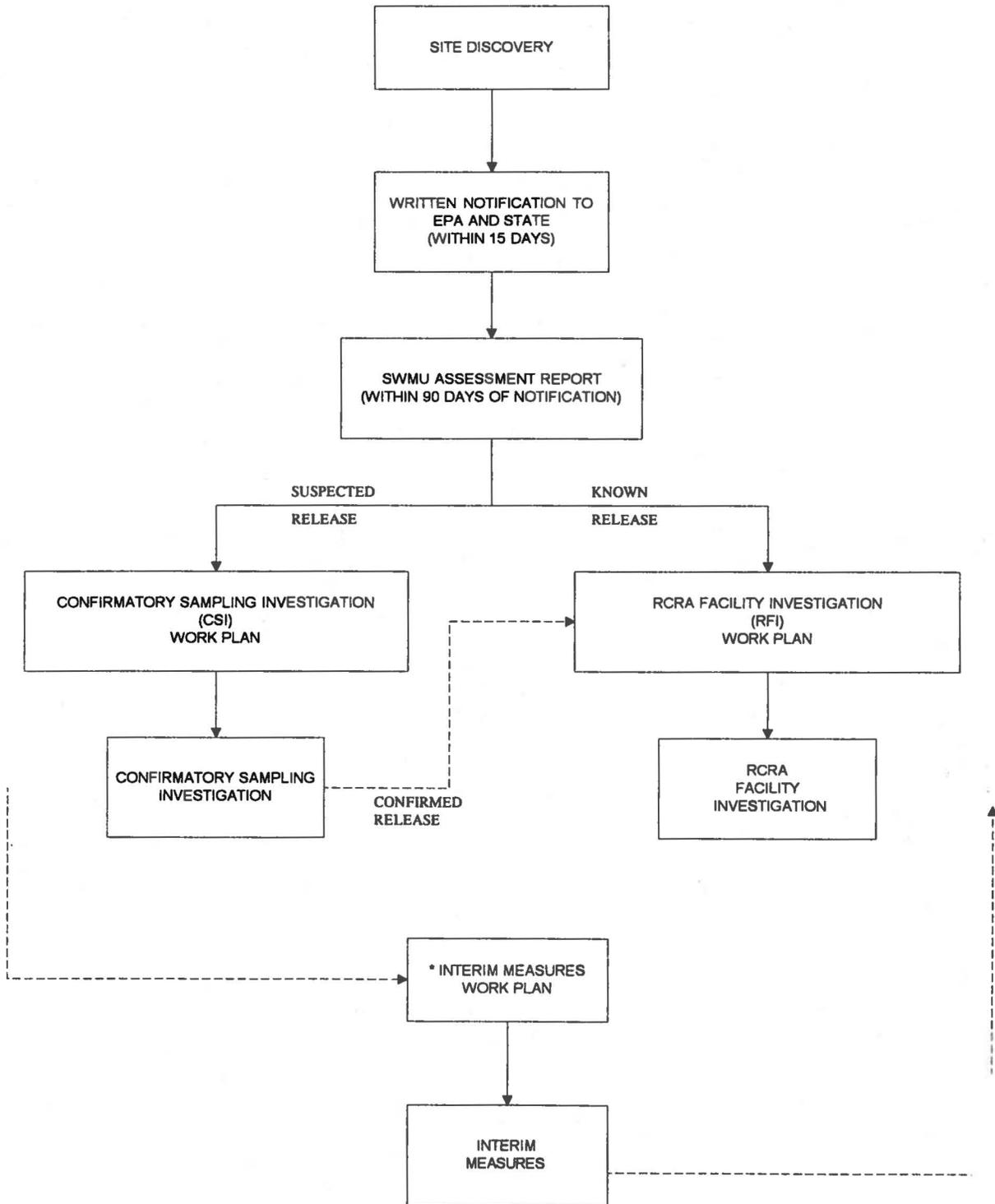
In accordance with the NAS Memphis RCRA permit, the following actions have been or will be taken in regards to the Radar Facility Dump:

- Notification of site discovery to EPA Region IV and the Tennessee Department of Environment and Conservation (TDEC).
- Preparation of a SWMU Assessment Report (also known as a RCRA Facility Assessment or RFA) for submittal to EPA and TDEC.
- Preparation and implementation of an Interim Measures Work Plan to stage, sample, overpack, and remove the drums (and other materials).
- Preparation and implementation of a RFI Work Plan describing the sampling that will be performed to determine the nature and extent of contamination, if any, at the site.



Interim Measures Flow Chart

NOTIFICATION AND INVESTIGATION OF NEW SITES



*Interim measures may take place at any time during the investigative process.

◆ **Interim Measures**

The RCRA process allows NAS Memphis to take *Interim Measures*, or corrective actions, to stabilize, control, or otherwise limit further releases or contaminant migration from a site or to limit human and environmental exposure while evaluating long-term remedies. These measures may be taken at any time during the process and should fit in and be part of any long-term solution at NAS Memphis. In some cases, the interim measures may resolve the problem entirely.

Interim measures may be taken in a variety of situations, including:

- When an area of environmental concern has the potential to harm human health or the environment (such as abandoned drums or storage tanks).
- When conditions could result in environmental damage (such as rainwater washing through contaminated soil, carrying the contamination into water supplies).
- When an area of environmental concern is damaging the environment (such as an overflowing waste pond).

An **Interim Measures Work Plan** must be prepared to inform the USEPA and the State of Tennessee how and why the interim measures will be taken. This work plan must begin with information on the interim measures' objectives and detail technical aspects such as how data will be collected, what sampling methods and standards will be followed, analysis routines, and schedules. Examples of interim measures include removing and/or overpacking drums, excavating contaminated soil, fencing an area to prevent direct contact, providing alternative water supplies, and providing runoff and runoff controls.

◆ **For Details**

If you want more information on the sites identified at NAS Memphis, interim measures, or any other aspect of the ongoing Installation Restoration Program, please contact the NAS Memphis Public Affairs Office at (901) 873-5761.