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NAS MEMPHIS

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# U.S. DEPARTMENT OF THE NAVY

## BASE REALIGNMENT AND CLOSURE and INSTALLATION RESTORATION PROGRAMS

### COMMUNITY RELATIONS PLAN (CRP)

NAS MEMPHIS  
MILLINGTON, TENNESSEE



AUGUST 1994

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## 1.0 INTRODUCTION

This **Community Relations Plan (CRP)** for **Naval Air Station (NAS) Memphis** develops a program to establish communication and information exchange between Navy agencies, the public, and various federal, state, county and community agencies. Effective communication and timely information exchange with the public are essential for maintaining community understanding and support of the Navy mission and for implementing successful environmental activities at NAS Memphis.

The purpose of the CRP is to outline activities designed to inform the public of planned or ongoing actions of the Navy's **Installation Restoration Program (IRP)** and the **Base Realignment and Closure (BRAC)** process and to provide opportunities for the public to offer valuable input. The primary objectives of this plan are to provide

a way for Millington area residents and agencies to interact with the Navy, and to assist in resolving issues of public interest and concern. Throughout the IRP and all environmental activities related to BRAC, the CRP encourages the involvement and interest of citizens from the Millington area, as well as representatives from federal, state, and local agencies.

### CRP Goals

- Provide for the exchange of information.
- Solicit input, comments and active involvement from the public, concerned agencies, and elected and civic leaders.
- Provide a central point of contact to address public concerns and distribute information regarding the NAS Memphis IRP and BRAC activities.

**O**nly environmental issues directly related to investigating and remediating sites covered by BRAC and the Navy's IRP at NAS Memphis will be released in this Community Relations Plan and subsequent community outreach activities.

This plan specifically addresses the work to be performed at NAS Memphis under the **Department of Defense's (DOD)** environmental restoration programs. Interactions between the base and the Millington community will focus on the community's involvement in this project. Public involvement begins during facility investigations and continues through to the final decisions. Citizens are encouraged to become involved by attending public meetings (including those of the **Restoration Advisory Board - RAB**), reviewing available information, and submitting ideas to either the NAS Memphis **Public Affairs Office (PAO)** or one of the community representatives on the RAB. A list of RAB members is available from the base PAO.

**Public Affairs Office  
NAS Memphis  
Millington, TN 38053  
(901) 873-5761**

Fact sheets providing current information about site activities will be mailed to local homes, businesses, political leaders, and news media. A mailing list is maintained by the NAS Memphis PAO and is included in this CRP as Appendix A. Individuals may be added to the mailing list by contacting the NAS Memphis Public Affairs Office at the address above. More detailed information is available at two public repositories, which have been established at the locations listed below.

**Repository Location and Hours**

Shelby County Public Library Millington Branch 4858 Navy Road Millington, TN 38053 (901) 872-1585	Monday - Wednesday	10 a.m. - 8 p.m.
	Thursday - Sunday	10 a.m. - 6 p.m.
NAS Memphis Library South 78 Building (901) 873-5683	Monday - Thursday	10:30 a.m. - 9 p.m.
	Friday - Saturday	9 a.m. - 6 p.m.
	Sunday	Closed

## **2.0 NAS MEMPHIS BACKGROUND**

### **2.1 Location**

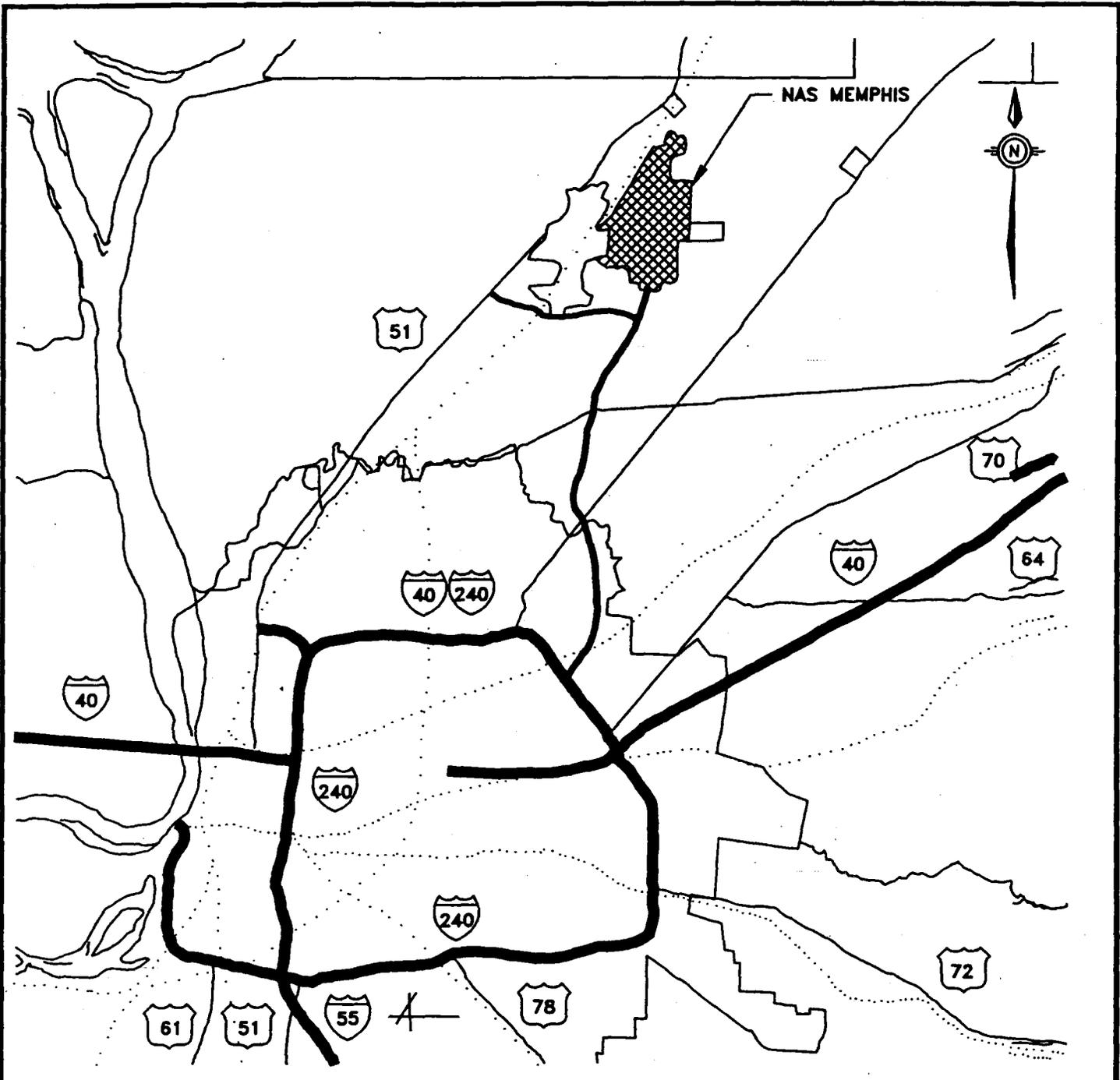
NAS Memphis is located on 3,490 acres in Millington, Tennessee, approximately 20 miles northeast of the City of Memphis and 13 miles east of the Mississippi River. NAS Memphis is bordered on the west by the City of Millington and on the north, south, and east by agricultural and residential areas. A map showing the location of NAS Memphis is included as Figure 2-1.

### **2.2 History and Mission**

**History.** NAS Memphis began as Park Field, an Army Signal Corps Aviation School used to train pilots and ground crews for service with the Allied Forces during World War I. When commissioned as a Naval Reserve Air Base on September 15, 1942, the primary mission of the base remained much the same - to train a new generation of aviation cadets for action in World War II. On January 1, 1943, the installation was redesignated a naval air station. The station at that time encompassed only the area now called "Northside," located north of Navy Road.

The concept of NAS Memphis changed completely on April 1, 1949, when all support logistics requirements of activities aboard the naval reserve, except the Naval Hospital, were assigned as responsibilities of the Naval Air Station. Since that time, NAS Memphis has grown from 2,200 acres to a 3,500-acre complex and is currently known as the largest inland naval air station (by population) in the world. NAS Memphis has a work force of more than 5,000 military and civilian personnel. The student population averages around 7,000.

**Mission.** NAS Memphis maintains and operates the facilities and provides services and materials necessary to support operations of aviation activities, units of the Naval Education and Training Command, and other activities as designated by the Chief of Naval Operations. The base also serves as an essential refueling stop for transient aircraft.



MEMPHIS, TENNESSEE



COMMUNITY RELATIONS  
 PLAN  
 NAS MEMPHIS  
 MILLINGTON, TN.

FIGURE 2-1  
 VICINITY MAP

Considered a landlord by the 25 resident commands, NAS Memphis administers the tasks that keep such a large civilian and military city functioning properly. The installation has its own fire department, police force, public works department, and air terminal. Thirty-five DOD activities are located at NAS Memphis, including the Chief of Naval Technical Training. Seven non-DOD activities are also headquartered there.

### **3.0 THE INVESTIGATION PROCESS**

#### **3.1 The Installation Restoration Program**

In 1980, Congress passed the **Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)**. This law set up a Superfund to clean up past hazardous waste sites (such as landfills) nationwide and made the **United States Environmental Protection Agency (USEPA)** responsible for monitoring the process. When first implemented, CERCLA did not apply to federal facilities. Therefore, the DOD established its own environmental program, the IRP, which parallels CERCLA requirements. The Navy has been actively restoring installations since 1980 and has been aggressively investigating potential hazardous substance contamination that may have resulted from past practices at its installations. The Navy is committed to complying with both its legal and community obligations to protect public health and the environment.

In 1986, Congress amended CERCLA with the **Superfund Amendments and Reauthorization Act (SARA)**. This act, for the first time, required DOD and other federal facilities to meet CERCLA requirements. DOD's IRP complies with CERCLA and SARA.

#### **3.2 The Resource Conservation and Recovery Act**

In 1976, Congress passed the **Resource Conservation and Recovery Act (RCRA)**, establishing a national strategy for managing ongoing solid and hazardous waste operations. RCRA was amended by the **Hazardous and Solid Waste Amendments (HSWA) of 1984**. As part of HSWA, Section 3004(u) requires corrective action of past hazardous waste or constituents releases from any **solid waste management unit (SWMU)** as a permit condition. According to the *Code of Federal Regulations (CFR)*, a SWMU is "any discernable waste management unit from which hazardous constituents may migrate, irrespective of whether that unit was intended for the management of hazardous wastes." NAS Memphis holds a RCRA permit to operate a storage facility for hazardous waste and, consequently, is regulated under RCRA's

corrective action process. That process, which is outlined below, is virtually equivalent to a CERCLA response action.

The RCRA Corrective Action process consists of five steps:

- The **RCRA Facility Assessment (RFA)** identifies potential or actual contamination releases by reviewing records and visually examining each SWMU.
- The **RCRA Facility Investigation (RFI)** confirms contamination and determines its nature. The RFI also examines the extent and rate of any migration by implementing a logical and strategic work plan. It also provides baseline data for evaluating the progress of corrective measures.
- The **Corrective Measures Study (CMS)** develops and evaluates corrective measures alternatives, recommending the most appropriate alternative.
- The **Corrective Measures Implementation (CMI)** is the design, construction, and operation of the corrective measure(s) recommended in the CMS. This step also involves the maintenance and monitoring of a corrective measure's performance.
- **Interim Measures (IM)** are corrective actions to stabilize, control, or limit further releases. These can be implemented at any point in the process.

Appendix B contains more terms used in environmental investigations.

### **3.3 Defense Base Closure and Realignment Act of 1990 (aka BRAC)**

The BRAC legislation identifies certain DOD bases for realignment and/or closure, resulting in all or part of their real property being turned over to the host community. When a base is slated for closure or realignment (realignment and partial closure in the case of NAS Memphis), the IRP environmental activities are accelerated and absorbed into the BRAC process, which is necessary to legally transfer the property. When this acceleration occurs, the need for community involvement also increases. The BRAC process allows for more community involvement than the IRP in the information-sharing and decision-making processes pertinent to the property to be "realigned" or transferred. Property not affected by BRAC retains its IRP status and continues to be studied and restored on the original timeline, while the schedule for BRAC property is pushed forward.

A comprehensive, interactive, and accelerated plan for cleanup — a **BRAC Cleanup Plan (BCP)** — has been developed to prepare portions of NAS Memphis for community reuse as quickly as possible. The BCP is based on the findings of an **Environmental Baseline Survey (EBS)** conducted at NAS Memphis to evaluate the environmental condition of specific sites or property. The EBS will be used to guide the Navy in making sound property transfer decisions. DOD policy requires an EBS before any property can be sold, leased, transferred, or otherwise acquired by the community.

In the case of the BCP and the EBS, greater community involvement is necessary to ensure that the process is completed in a manner consistent with the needs of the community. Greater involvement also ensures the community's concerns are addressed in the decisions reached by the Navy and DOD regarding the property's disposal. Community members are urged to attend public meetings and to study the program's particular environmental and community goals.

### **3.4 Site Descriptions: Zone 1 (BRAC sites)**

As a condition of its RCRA permit, NAS Memphis conducted an RFA in 1987 to identify and characterize all active and inactive SWMUs at the facility. An RFI is now underway to evaluate the SWMUs known, suspected or presumed to have released hazardous substances. Sixty-five SWMUs have been identified at NAS Memphis and two other sites have been identified as possible SWMUs. Forty-five of the SWMUs will be investigated during the RFI; 15 require full RFI characterization, 28 require **Confirmatory Sampling Investigation (CSI)** and two will be investigated under the Navy's underground storage tank program. USEPA is not requiring further action on the remaining 20 SWMUs.

The 45 SWMUs subject to the RFI have been broken into two major groups, due to the differing requirements under BRAC and the IRP. The SWMUs in Zone 1 are those sites which are in the area to be transferred to the community and therefore covered under BRAC. Zone 2 consists of SWMUs in the area which is to be retained by the Navy. All of Zone 1 lies north of Navy Road, while Zone 2 includes property both north and south of Navy Road. Dividing the sites into groups to be addressed under separate schedules enables the RFI process to be expedited for BRAC sites, allowing for quicker turnover of the property to the community. This section, 3.4, describes the SWMUs to be addressed during the RFI in Zone 1. Zone 2 sites are described in Section 3.5. Figure 3-1 shows the locations of sites included in the RFI.

#### **3.4.1 Zone 1 Sites Requiring Full RFI Characterization**

##### **3.4.1.1 SWMU 1 — Fire Department Drill Area**

The Fire Department Drill Area was used to train firemen in crew rescue techniques for downed aircraft. The area, which consisted of approximately 3,000 square feet of existing asphalt runway on the approach end of abandoned Runway 09, is now part of the airfield.

**Figure 3-1 Environmental Site Map**

One training session per month was conducted in this area from 1960 until 1984. During each training session, approximately 55 to 100 gallons of JP-4 and waste fuels were sprayed on and around an aircraft simulator and ignited. The burning fuel was extinguished by the training crew. Fire training is currently conducted at a different location on the southwest corner of the north side of the base.

#### **3.4.1.2 SWMU 3 — Building N-121 Plating Shop Dry Well**

Building N-121, which is located on the Northside on Casablanca Road, contained a plating shop where cadmium, chromium, copper and nickel plating were conducted using cyanide-based solutions. The dry well was used for disposal of both concentrated plating solutions and overflows from the plating tanks. Dilute wastewater was discharged into the storm sewer and drainage ditch (SWMU 4).

#### **3.4.1.3 SWMU 4 — Building N-121 Plating Shop Storm Sewer and Drainage Ditch**

The storm sewer and ditch flow west from Building N-121 along Casablanca Road to First Avenue, turning southwest into an open drainage ditch which eventually discharges into North Fork Creek.

Building N-121 contained a plating shop as described previously. SWMU 3 was used for disposal of concentrated plating solutions and overflows from the plating tanks. Dilute wastewater was discharged into the storm sewer and drainage ditch. The shop reportedly discharged 17,000 gallons of diluted plating wastewater to the storm sewer each day from 1951 through 1976.

#### **3.4.1.4 SWMU 5 — Aircraft Fire Fighting Training Area**

SWMU 5 has been used to train fire fighters in rescue techniques since 1949 and is still in operation. The area is located in the northcentral section of the base and consists of three rectangular concrete-lined pits and two circular concrete-lined pits. Prior to 1977, overflow

discharges of JP-4 fuel from these pits drained into the adjoining storm drainage ditch (SWMU 4). Since 1977, the fuel has been allowed to burn itself out, thus preventing overflow. The two circular pits have a double-lip curb to contain fuel during the burning operation. JP-5 fuel is currently burned at the facility. JP-4 and waste fuels, possibly mixed with waste solvents, were burned in the past.

#### **3.4.1.5 SWMU 6 — Building N-126 Battery Shop Storm Sewer and Ditch**

Building N-126 is located on the north side of the NAS in the flight operations area. The battery shop operated from 1955 until 1981. SWMU 6 is a storm sewer system which is currently still in use. Approximately 100 gallons per day of a mixture of diluted and neutralized acid were discharged into the storm sewer. Electrolyte spills and drippings were discharged into floor drains located in Building N-126. These floor drains are connected to 3 and 4-inch acid resistant pipes which empty into the storm sewer and flow into a drainage ditch. Substantial erosion and scouring of the ditch has been observed at the point where the sewer discharges into the ditch.

#### **3.4.1.6 SWMU 7 — Building N-126 Plating Shop Dry Well**

SWMU 7 is an inactive dry well, formerly used for disposal of plating wastes from 1955 until 1978. The unit is located in the flight operations area next to Building N-126 which housed the plating operations of the Aircraft Intermediate Maintenance Department. The dry well was used for the disposal of concentrated nickel, cadmium and chromium cyanide-based plating solutions and rinse water from the plating operation. The waste from the plating operation was discharged into the dry well and allowed to percolate into the surrounding soil.

#### **3.4.1.7 SWMU 8 — Cemetery Disposal Area**

SWMU 8 is an inactive disposal area located in the northern portion of the NAS, immediately west of the departure end of Runway 04. This 5 to 8-acre area was reportedly used for solid and hazardous waste disposal from 1965 to 1980. According to Navy personnel, wastes disposed of included several canisters of ethylene oxide, metallic scrap, waste chemicals, waste

oil, cleaning solutions, transformers, and capacitors. The wastes are believed to be buried to a depth of 8 feet below the original ground surface.

#### **3.4.1.8 SWMU 38 — Northside Industrial Drainage Ditches**

The drainage ditches of concern are inactive and located throughout the Northside industrial area and in portions of the Southside. The original design of several buildings at NAS Memphis provided for floor drains which discharged to storm sewers and storm drains. As buildings were remodeled and replaced, these drains were eliminated or re-piped to the sanitary sewer. By 1980, most had been replaced. Various substances including solvents, degreasers, oils and paints were discharged down these drain lines into the drainage ditches. The industries located at the station vary in their past usage of hazardous wastes and substances. Many organic and inorganic hazardous constituents may have been washed down floor or storm drains to area drainage ditches.

#### **3.4.1.9 SWMU 40 — Salvage Yard No. 1**

Salvage Yard No. 1 is a combination of two fenced-in, open storage areas designated as Area No. 813 and Area No. 1666. The yard was used from 1945 until 1989 and, based on historical information, was not used for burying waste. Area No. 813 (unpaved) was formerly used to store scrap pieces of airplanes, anchor chains and other hardware. Area No. 1666 (paved) was used for vehicle storage. In 1988-89, this area was converted into an asphalt parking area for mobile trailers used for electronic communications training.

#### **3.4.1.10 SWMU 60 — Northside Landfill (Western Portion)**

This area was originally a ravine used between 1951 and 1986 for the disposal of construction debris. The only documented description of waste disposal at this site is found in several 1980 contract documents which required contractors to use the area for disposal of rubbish and debris such as paper, metal, scrap, ashes, leaves and other construction materials. In 1980, a tank containing hydrocarbons was found (above ground) at this SWMU, indicating that small

quantities of NAS-generated wastes may have been deposited here. Therefore, additional study was recommended.

### **3.4.2 Sites Requiring CSI**

#### **3.4.2.1 SWMU 15 — Building N-94 Underground Tank Farm**

The N-94 Tank Farm is located in an area approximately 40,000 square feet in size. The tank farm consisted of 10 USTs with capacities ranging from 10,000 to 25,000 gallons. It was used between 1943 and 1986 to store aviation gasoline. The tanks were removed in 1991. After abandonment (and before removal), five of the tanks were improperly used to store liquid wastes generated by the Aircraft Intermediate Maintenance Department.

#### **3.4.2.2 SWMU 18 — Building N-112 Underground Waste Tank**

This tank has a capacity of 550 gallons and contains waste oil and hydraulic fluid generated by the Ground Support Equipment Shop during the maintenance of vehicles used in aircraft operations. The tank has been in use since 1979. The tank bottom is approximately 8 feet underground. It is anchored to an 8-inch thick concrete pad to prevent flotation in the event of high groundwater levels. Though no leak has been reported, the integrity of the tank and associated piping will be verified.

#### **3.4.2.3 SWMU 21 — Building N-10 Underground Waste Tank**

Removed in 1992, this tank had a capacity of 5,000 gallons. Installed in the early 1940s, it originally held waste oil and hydraulic fluid generated by an automotive repair operation and was possibly used later by an aircraft maintenance shop. The tank is located near Building N-10.

#### **3.4.2.4 SWMU 26 — Building N-102 Battery Acid Neutralization Unit**

This unit initially consisted of a lead-lined sink that batteries were drained into prior to discharge to an underground neutralization sump connected to the sanitary sewer. The lead-lined sink was replaced by a neoprene (plastic) sink between 1987 and 1989. The sodium carbonate-filled

neutralization sump began operations in 1980. It is reportedly pumped and new sodium carbonate added every 6 months.

#### **3.4.2.5 SWMU 27 — Northside Sewage Treatment Plant**

Demolished in 1984, the treatment plant was located on the northwest corner of Dakar Street Extended at Outlet Avenue. The plant consisted of aeration tanks, digesters, polishing tanks and sludge drying beds. The facility operated from 1943 until 1984. The sewage collection system which delivered wastewater to the plant served housing and some industrial areas.

#### **3.4.2.6 SWMU 42 — Building N-12 Interim Hazardous Waste Storage Area**

SWMU 42 was an interim status hazardous waste storage facility where containerized hazardous wastes were stored pending transport for off site disposal. The area consists of a 70' x 45' paved storage apron and a Quonset-type building. Used since the 1940s, the area was recently replaced by a new hazardous waste container storage facility. Wastes stored in this area included waste oils, paint and solvents. A RCRA closure of this unit was performed in 1989; however, the unit has been used for storage of waste oil since the closure. Therefore, confirmation sampling will be conducted during the RFI.

#### **3.4.2.7 SWMU 44 — Building N-102 Hazardous Waste Accumulation Point**

This SWMU served as an accumulation point for vehicle batteries drained and flushed at SWMU 26 which is located at Building N-102. The actual location of the accumulation area was along the west side of Building N-122. The batteries were stored on pallets until picked up by a salvager. This process has been discontinued. There is no visual evidence of a release at this SWMU.

#### **3.4.2.8 SWMU 50 — Building N-126, MAG-42 Hazardous Waste Accumulation Point**

This SWMU served as an accumulation point for automobile batteries and containerized mineral spirits and paint thinners since 1955. Wastes were accumulated in drums and mobile bowsers

(tanks on wheels). After 1985, storage activities were moved from the fenced compound on the west side of Building N-126 to a site south of SWMU 21. It has been reported that releases occurred when the unit was located in the fenced compound (which is the site that will be investigated).

#### **3.4.2.9 SWMU 51 — Building N-126, VR-60 Hazardous Waste Accumulation Point**

This waste storage unit has changed locations several times. A records review indicates that the SWMU was located in the fenced compound on the west side of Building N-126, on asphalt and within sand bag containment, from 1985 until 1990. In 1990, the SWMU was identified as being located on the edge of the apron on the north side of Building S-1600. Currently, the SWMU is located on the concrete apron against the north side of Building N-126 where drums are being stored in locked hazardous materials lockers which have containment. The unit serves as an accumulation point for containerized mineral spirits and paint thinners generated by VR-60 Squadron. The inactive site west of Building N-126 will be investigated.

#### **3.4.2.10 SWMU 52 — Building N-126, VP-67 Hazardous Waste Accumulation Point**

The location of SWMU 52 has changed several times. It has been reported as being located inside Building N-126. In 1985, the State inspected the SWMU and reported its location as being inside the fenced, asphalt compound on the west side of Building N-126. It is now within a fenced containment area within the fenced compound. The accumulation point has been used since 1955 to temporarily store drummed mineral spirits and paint thinners generated by VP-67 Squadron. A bowser (tank on wheels) was also reportedly used for storage of the wastes. The fenced compound will be investigated during the RFI.

#### **3.4.2.11 SWMU 53 — Building N-126 Hazardous Waste Accumulation Point AIMD**

This SWMU is located on the south side of SWMU 42 which is north of Building N-12. It consists of a Quonset hut storage shed with containment within a fenced, asphalt compound north

of Building N-12. This SWMU was once used as the Interim Storage Facility and was closed on June 10, 1987 in accordance with the approved closure plan dated September 15, 1986. The SWMU 53 location has changed several times. In 1987, it was reported as being located within Building N-126. In 1989, the SWMU was reported to be located west of Building N-126 in a fenced, asphalt compound with containment. However, a records review indicates the SWMU has been located at the closed portion of the Quonset hut since 1987. The accumulation point has been used since 1955 to temporarily store drummed TCE, mineral spirits, and paint thinner wastes generated by the AIMD. A bowser (tank on wheels) was also reportedly used for storage of the wastes. The fenced compound and the Quonset hut units will be investigated during the RFI.

#### **3.4.2.12 SWMU 62 — M-21 Arresting Gear**

This SWMU is located on Runway 04/22 on the Northside. Hydraulic fluid, lubricating oil and diesel fuel were used at this site. Rainwater and residual waste from the operation of arresting gear drained from a 6-inch pipe into a gravel-filled containment structure. Water drained out through holes in the bottom of the structure and floating oil was periodically removed from the top.

#### **3.4.2.13 SWMU 64 — N-16 Materials Storage Area**

SWMU 64 consists of a 22' x 200' concrete pad used by the NAS Memphis Fire Department for storage of drums of used oil and fire fighting extinguishing agents (e.g., aqueous film forming foam [AFFF] and Purple K). A utility shed is also located on the pad. Regular inspections at the site have revealed no sign of drum leakage or spillage. It has also been reported that transformers were stored just north of the pad at N-16. This area will be investigated along with the N-16 Materials Storage Area.

### **3.5 Site Descriptions; Zone 2 (IRP sites)**

Zone 2 sites are SWMUs on property which is to remain under Navy control, and therefore not governed by the BRAC process. These sites still retain their IRP status and continue to be studied and restored on the original timeline, but they do not receive BRAC funding or accelerated attention. Zone 2 consists primarily of NAS Memphis property south of Navy Road.

#### **3.5.1 Zone 2 Sites Requiring Full RFI Characterization**

##### **3.5.1.1 SWMU 2 — Southside Landfill**

The Southside Landfill is located on the Southside next to the Big Creek Drainage Canal. Based on photographs and past field investigations, the landfill covers approximately 40 acres. The landfill was used from 1942 through 1970 for disposal of solid waste generated at NAS Memphis. The trench-and-cover method was practiced for disposal of waste. Combustible materials were burned before being covered. Wastes buried at the site included household, office and industrial (used aircraft parts and hardware) solid waste. Liquid wastes buried at the site include wastewater treatment sludge, waste oils and solvents.

##### **3.5.1.2 SWMU 9 — Sewage Lagoons**

SWMU 9 consists of two inactive sewage lagoons, formerly used as part of the municipal and industrial wastewater treatment system from 1969 to 1978. They received approximately 35 percent of the wastewater produced at NAS Memphis, with the other 65 percent going to the trickling filter plant (SWMU 28). Most of the wastewater received was sanitary waste, however, limited amounts of industrial waste were treated. The lagoons are located on the Southside, south of the Big Creek Drainage Canal. The larger lagoon has a surface area of approximately 400,000 square feet and the smaller lagoon 141,000 square feet. They are constructed of natural brown clays with levees that are 10 feet high which allows them to retain approximately 3 feet of water.

### **3.5.1.3 SWMU 14 — Former Site of Building S-140 & Seventh Avenue Ditch**

Building S-140 contained a paint spray booth, paint removing area and paint washdown area associated with training Navy personnel in various painting-related processes. Wastes from these activities were discharged to either two 1,885-gallon sumps or directly to a paint separator tank beneath the north side of the building intended to collect solid paint wastes. From 1943 until 1980, discharges from the paint separator and tanks went to the Seventh Avenue Ditch. After 1980, the discharges went to the sanitary sewer. Building S-140 was demolished in 1985.

### **3.5.1.4 SWMU 38 — Southside Industrial Drainage Ditches**

The drainage ditches of concern are inactive and located throughout the Northside industrial area and in portions of the Southside. The original design of several buildings at NAS Memphis provided for floor drains which discharged to storm sewers and storm drains. As buildings were remodeled and replaced, these drains were eliminated or re-piped to the sanitary sewer. By 1980, most had been replaced. Various substances including solvents, degreasers, oils and paints were discharged down these drain lines into the drainage ditches. The industries located at the station vary in their past usage of hazardous wastes and substances. Many organic and inorganic hazardous constituents may have been washed down floor or storm drains to area drainage ditches.

### **3.5.1.5 SWMU 59 — Building S-335 Old Pesticide Shop**

The old pesticide shop is a Quonset building on a concrete slab located near the southwest corner of the Southside. The building was used to store pesticides including DDT, chlordane, arsenic and dieldrin. In 1974, the SWMU was flooded with about 3 feet of water which damaged the stored dry pesticide pellets. The hut was locked, but not cleaned up, and is scheduled for demolition.

### **3.5.1.6 SWMU 65 — Building S-362, Training Mock Up**

This site has been used since the early 1950s for training personnel in aircraft startup. There are 15 40 foot by 22 foot concrete pads where aircraft are situated. The fueling of each aircraft is accomplished by pumper truck. Contaminants include jet fuel, hydraulic fluid, and lubricating oil. Petroleum contamination of soil and groundwater has been confirmed at this site based on sampling conducted in 1992. The nature and extent of contamination will be defined during the RFI.

## **3.5.2 Zone 2 Sites Requiring CSI**

### **3.5.2.1 SWMU 17 — Building S-9 Underground Waste Tank**

This unit consists of two active USTs. One tank has a capacity of 550 gallons and is located outside Building S-9. The other tank is inside the building and estimated to be the same size. Both tanks are used for waste oil storage, including waste hydraulic fluid.

### **3.5.2.2 SWMU 19 — Building 341 Underground Waste Tank & Tank 1648**

The Building 341 UST has a capacity of 280 gallons and holds waste automotive oil and hydraulic fluid generated by the Navy Exchange Service Station. Tank No. 1648 is a UST used to collect waste oil from Building 757 which houses automobile maintenance operations. Both tanks were installed in the late 1970s and are currently still in use.

### **3.5.2.3 SWMU 20 — Building 1594 Underground Waste Tank**

This tank was removed during the past year. It had an estimated capacity of 100 gallons and held waste oil and hydraulic fluid generated by the Air Traffic Control School. It was located at Building 1594.

### **3.5.2.4 SWMU 22 — Underground Fuel Tanks at Building S-75**

Four tanks were installed in 1942 near Building S-75 which is a boiler plant. These tanks were removed during the past year. The largest tank held 50,000 gallons. Two tanks each had

25,000-gallon capacities and one held 280 gallons. The boiler plant has not used the tanks since the early 1960s. Previous investigations indicate that diesel fuel was stored in the smallest tank. The other three tanks contained No. 2 fuel oil. Confirmation soil samples collected after removal of the tanks indicate that additional investigation will be required under the Navy's UST Program.

#### **3.5.2.5 SWMU 23 — Underground Fuel Tank at Building S-8**

Removed in 1992 under the Navy UST program, this 500-gallon capacity tank was installed in 1944 to store diesel fuel for the NAS Memphis Fire Station's emergency generator. The tank was used until sometime just prior to 1987. Confirmation soil samples collected when the tank was removed indicate that no further action will be required.

#### **3.5.2.6 SWMU 24 — Building N-114, Auto Hobby Shop Waste Oil Tanks**

The N-114 waste oil tanks are located above-ground at the Auto Hobby Shop, which is used by base personnel to repair privately owned vehicles. Waste oils and fluids are deposited in the two above-ground tanks which both have a capacity of 500 gallons.

#### **3.5.2.7 SWMU 30 — Park Field Waste Treatment Tank**

Constructed in 1917, this 36,000-gallon tank served Park Field, the Army aviation training facility which occupied the site of NAS Memphis. The tank was used from 1917 until 1942, when NAS Memphis was constructed. Park Field contained more than 60 buildings. These buildings were served by a dedicated sewage system which was connected to the underground tank. The complex included a complete military maintenance facility for aircraft and ground vehicles. A variety of oils, solvents, paints and other chemicals were discharged into the tank.

#### **3.5.2.8 SWMU 39 — Building S-74 PCB Storage Area**

This area is located at the north end of Building S-74. It has been used since 1980 to store transformers, capacitors and drums which may contain **polychlorinated biphenyls (PCBs)**. All

items are stored on wooden pallets which are on the ground. The area is routinely inspected for evidence of leaks, but no evidence has been found to date.

**3.5.2.9 SWMU 41 — Salvage Yard No. 2**

Salvage Yard No. 2 is a fenced-in open storage area designated as Area No. 885. Covering 5,700 square yards, the area has been operated by the Defense Reutilization Marketing Office (DRMO) since 1944. All storage is above ground with no historical or visual evidence of buried wastes. The yard is used to store scrap metal, tires, batteries, used furniture and other hardware. There is no history of liquid waste or chemical drum storage within the area.

**3.5.2.10 SWMU 43 — Building S-176 Hazardous Waste Accumulation Point**

This SWMU served as an accumulation point for drummed paint wastes from an unknown date until 1986. From this point, the drummed wastes were conveyed offsite for disposal. The area was inspected in 1990, with no visual evidence of a release.

**3.5.2.11 SWMU 45 — Building S-142 Hazardous Waste Accumulation Point**

SWMU 45 was a metal storage shed on a concrete slab located next to the former brig, Building S-142. This area was an accumulation point for drummed paint waste from 1983 to 1989. The drummed wastes were shipped offsite for disposal. Dried paint was observed on the ground at the foot of the door during a visual site inspection conducted by the Navy on April 19, 1990. All that remains of the building today is the concrete slab.

**3.5.2.12 SWMU 46 — Building S-140 Hazardous Waste Accumulation Point**

No longer in use, SWMU 46 was a waste storage area for Building S-140 which has been demolished. Drummed waste paint and paint thinners were stored in this area before shipment offsite for disposal. The ground surface was unprotected with no containment. Though there were no reports or visible signs of a release at the time of the building demolition, the lack of

a containment structure necessitates that sampling be conducted to confirm whether a release occurred.

**3.5.2.13 SWMU 47 — Building 344 Hazardous Waste Accumulation Point**

This SWMU is an inactive waste storage area used as an accumulation point for small (1- to 5-gallon) containers of mineral spirits before shipment offsite for disposal. The containers ranged in size from 1 quart to 5 gallons. The ground surface in the area was unprotected with no containment devices for possible spills. There have been no reported releases or visual indications of a release. However, the lack of a containment structure requires that sampling be conducted to confirm whether a release occurred.

**3.5.2.14 SWMU 48 — Building S-9 Hazardous Waste Accumulation Point**

This inactive waste storage area was used for Public Works maintenance. Containerized paint thinner and degreasing agents were stored here from 1950 until 1980 before shipment offsite for disposal. Currently, used batteries are temporarily stored on pallets in this area. It is an open storage area with an unprotected ground surface and no containment devices. There have been no reported releases or visual indications of a release. However, the lack of a containment structure requires that sampling be conducted to confirm whether a release occurred.

**3.5.2.15 SWMU 49 — Building N-757 Hazardous Waste Accumulation Point**

This SWMU is an inactive waste storage area with unprotected ground surface and no containment devices. Used automobile batteries and containerized waste mineral spirits were stored here from 1969 until 1986 before shipment offsite for disposal. Oil-stained asphalt was observed during a visual site inspection conducted by the Navy in 1990. This, along with the lack of a containment structure, requires that sampling be conducted to confirm whether a release occurred.

**3.5.2.16 SWMU 61 — Building N-26, Former Printing Shop**

This area was used in the early 1980s to clean printing equipment and before that to wash garbage cans and clean mops. The unit is outside Building N-26 and consists of a concrete pad with containment barriers. A drain in the center of the unit discharges into the sanitary sewer. The types of waste found at this SWMU include printer's ink and solvents. A visual site inspection conducted in 1990 revealed staining of surrounding soils.

**3.5.2.17 SWMU 63 — S-75N Underground Waste Tank**

Located next to Building S-75, this SWMU is a 7 foot by 7.5 foot area that once contained a 65-gallon stainless steel underground waste tank. When it was removed in April 1992, no tank leakage was evident. The tank's past uses are not known, but a sample taken from the tank indicated the presence of methyl ethyl ketone, acetone, ethyl benzene, toluene and xylene.

## **4.0 COMMUNITY PROFILE**

### **4.1 Geography and Economy**

**Geography.** Founded in the middle 1800s, Millington is seven miles east of the Mississippi River and 20 miles north of Memphis. The original area of the city was prone to flooding. The settlement moved to its current location in the 1870s. Today, the population numbers nearly 33,000 outside the base.

Millington lies in the East Gulf Coastal Plain section of the Coastal Plain Province and is characterized by a gently sloping terrain and moderately steep hills. In general, land surface elevations range from 270 feet above **mean sea level (msl)** in the southeast corner along the Big Creek drainage canal to 350 feet above msl in the northern portion near Tanya Lake.

**Economy.** The Navy is the largest employer in Millington and one of the largest in Tennessee. NAS Memphis handles an annual payroll that produces an economic impact of \$242 million on the local community and more than a billion dollars on the Mid South area. Other major businesses in the Millington area include retail, food stores, and automobile sales and service.

### **4.2 Environmental Community Involvement History**

A fact sheet was mailed to the media and individuals on the mailing list in October 1992, notifying the community that investigations were starting at three SWMUs that were given priority because of planned construction activities.

A news release was issued January 18, 1993, announcing that community interviews would begin January 25, 1993. The information gathered during interviews was used to compile this CRP.

In February 1994, steps were initiated to form a **Restoration Advisory Board (RAB)**. The **Technical Review Committee (TRC)**, established to review and comment on proposed Navy actions related to the IRP, has been absorbed into the RAB which was established to give the

community greater opportunity to advise NAS Memphis on its environmental restoration program. A RAB also acts as a focal point for information exchange between NAS Memphis and the community. The RAB is made up of volunteers from the community and members of the TRC, which includes representatives from NAS Memphis, the Millington city government, the **United States Environmental Protection Agency (USEPA)**, the **Tennessee Department of Environment and Conservation (TDEC)**, and Southern Division Naval Facilities Engineering Command. RAB members are listed in Part IV of Appendix A. The RAB enables the community to have its concerns addressed directly, as well as provide the community with a direct link to the decision-making group (the **BRAC Cleanup Team - BCT**).

#### **4.3 Community Concerns**

Community interviews began January 25, 1993, and were completed February 18, 1993. The goal was to determine community concerns and information needs regarding environmental studies at NAS Memphis. During the survey process, which was conducted with residents and officials of the Millington area, individuals were identified for interviews and visited by the survey team. Questions used during the interviews and a detailed summary of responses are included in Appendix C. Thirty-three people participated in the interviews.

The Millington community is environmentally sensitive primarily because of several highly publicized activities, including an off-base, private Superfund site at the Pulvair Pesticide Plant. Many other businesses in the area have worked with TDEC and USEPA to remove underground storage tanks (USTs). The community also opposed a Browning-Ferris Industries landfill proposal which resulted in additional measures being set forth in the permit to protect the environment when the landfill finally was established. All these factors contribute to the community's heightened awareness and interest in any environmental activities occurring at or near NAS Memphis.

Most interviewees said NAS Memphis is conducting operations in an environmentally safe manner; however, some concerns exist. Several residents are apprehensive about increased noise and air pollution as the result of the joint-use airfield project being planned with the City of Millington. Another very visible area of concern mentioned by several other individuals is firefighter training. However, these concerns are offset by the community's awareness that the training associated with the activities is a necessary function of the NAS mission.

## **5.0 COMMUNITY RELATIONS OBJECTIVES**

The objectives of this CRP are described below. Methods designed to achieve each objective follow the descriptions of the program goals. The ultimate aims of this plan are to fully explain the purpose and goal of the IRP and BRAC, to address the differences between past and present waste-handling practices, and to explain the relationship between the IRP, BRAC, and the community's involvement in this decision-making process. The CRP will take the community's information needs into account and will provide consistent information to keep the community updated on the progress of the IRP and BRAC programs at NAS Memphis.

### **5.1 Objective 1: Community Involvement**

This CRP will give community residents the opportunity to comment throughout the investigative and decision-making process. Residents will be encouraged to participate in the process to help determine how local concerns may impact long-term decisions.

#### **Methods of Involving Millington Community Residents:**

- Develop two-way communication between the community and decision-makers through methods such as the Restoration Advisory Board.
- Provide opportunities for formal and informal comments on documents and plans.
- Hold meetings with individual citizens and area clubs and groups when needed or requested. Include the name and telephone number of the program contact person in all correspondence concerning the project.
- Hold public meetings to discuss Corrective Measures Study results and remedial alternatives. All RAB meetings are open to the public and are advertised.
- Provide information to the Millington community through updates to the CRP, periodic fact sheets, and releases to the local media.
- Provide information, including studies and reports, in an information repository for public access and use.
- Create a mailing list to which information pertaining to environmental activities at the base and all RAB meeting announcements will be sent.

## 5.2 Objective 2: Two-Way Communication

Local residents and workers, as well as federal, state and local officials, will be informed in a timely manner of major findings, recommendations, and remedial activities, as well as status reports on the projects being conducted at NAS Memphis. Information will also be distributed about the reasons and methods behind any additional actions under consideration.

### Methods of Accomplishing Successful Two-Way Communication:

- Produce fact sheets discussing BRAC and IRP activities including technical information in non-technical language.
- Maintain a mailing list of local, state, and federal officials and other interested individuals and groups. Names may be added to the mailing list by contacting the PAO.
- Send fact sheets to all people on the mailing list, to those who request them, and to those identified as being interested or affected parties.
- Send fact sheets/news releases to local newspapers, radio, and television stations for wide distribution of information. The weekly base newspaper also will provide information.
- Provide speakers to present programs about IRP issues. The requests will be coordinated through the PAO.
- Announce public meetings through advertisements and media releases in one or more of the following: daily newspapers, fact sheets, and flyers. Print a public notice at least two weeks before the meeting.

## 5.3 Objective 3: Conflict Resolution

The third objective is to focus on and resolve any conflicts that may arise. Central to the success of this objective is the continued commitment of community members to sharing information and concerns, including participating in the RAB meetings and process.

**Methods of Resolving Conflict:**

- Identify conflict and develop a forum for resolution, if doing so serves a useful purpose for both the Navy and the community.
- Provide a forum where community members are able to voice questions and concerns directly to members of the decision-making body, alerting that body to genuine and specific areas of concern that may be addressed in realignment decisions and environmental actions.
- Provide experts to address questions about remedial actions and alternatives.

## **6.0 COMMUNITY RELATIONS ACTIVITIES AND SCHEDULE**

All communications activities are designed to provide the public with current information and the opportunity for input during each phase of the environmental program. Community relations activities and their relationship to technical milestones are described below.

### **Prior to RFI/Corrective Measures Study (RFI/CMS):**

- Create an information repository and publicize its availability and location.
- Publicize the name, address, and phone number of the primary contact person who will respond to all inquiries about the IRP and BRAC programs.
- Develop a mailing list of concerned community members, local elected officials, appropriate agencies, and the local media for distribution of IRP and BRAC materials.
- Distribute a fact sheet introducing and explaining BRAC and the IRP to everyone on the mailing list. Write articles for publication in the base newspaper.
- Distribute news releases to local news media about BRAC, the IRP, the CRP, and the information repositories.
- Maintain contact with local officials and community leaders to provide information about BRAC and the IRP and to monitor community concerns.
- Hold informal community meetings to discuss studies, analyses, results, and plans. Presentations and speakers can be arranged for interested and affected groups, subject to scheduling availability. Interested parties should contact the NAS Memphis PAO.

### **During RFI:**

- Update the information repository as necessary. Publicize the availability and location of the information repository.
- Publicize the name, address, and telephone number of the primary contact person who will respond to all inquiries about BRAC and/or the IRP.
- Maintain a mailing list of concerned community residents, elected officials, appropriate agencies, and the local media for distributing informational materials.

- If appropriate, distribute fact sheets to everyone on the mailing list, updating the community on RFI findings.
- Distribute news releases to local news media about BRAC, the IRP, the CRP, and the information repositories.
- Maintain contact with local officials and community leaders to provide information about BRAC and the IRP and to monitor community concerns.
- Hold informal community meetings to discuss studies, analyses, results, and plans. Presentations and speakers can be arranged for interested and affected groups subject to scheduling availability. Interested parties should contact the NAS Memphis PAO.

**Upon Completion of RFI:**

- Update and publicize information repository.
- Continue to publicize the point of contact.
- Update the mailing list.
- Distribute fact sheets to everyone on the mailing list and/or write articles to explain RFI findings and to discuss the next phase of the project. Update orientation packages and/or housing materials.
- Inform community leaders of the RFI's completion and results.
- Update and continue to provide presentations for informal community groups on the RFI results.

**During CMS:**

- Distribute fact sheet to everyone on the mailing list and/or write articles for publication reporting the CMS status.
- Update the mailing list.
- Continue to respond to requests for speaking engagements.

**Upon Completion of CMS:**

- Update and publicize information repository.
- Publicize the environmental point of contact.

- Update the mailing list.
- Prepare fact sheet and/or articles for Navy publications and local news media announcing completion of the CMS, explaining the criteria used for evaluating alternatives and reporting the recommendation.

**Proposed Plan Activities**

- Prepare news release and public notice for placement in a local newspaper to announce the availability of the proposed plan in the information repository for review and comment. Send comments to the primary contact person.
- Prepare news release and public notice for placement in a local newspaper to announce a public meeting and the start of a 45-day public comment period.
- Hold a public meeting to discuss the CMS report, outline the proposed plan, and explain the public comment period.
- Place a transcript of the proposed plan public meeting in the information repository.
- Summarize significant comments and respond to criticisms and new relevant information submitted during the public comment period. Make this responsiveness summary available to the public.
- Hold informal community meetings as warranted by the level of public interest.
- Maintain contact with local officials and community leaders.
- If necessary, prepare a fact sheet on public comments received on the proposed plan.

**During Design and Implementation of Corrective Measures:**

- Update information repository, as necessary.
- Review and, if necessary, revise the CRP to reflect any changes in public concern over governmental actions.
- Update local officials and community leaders to discuss corrective measures.
- Prepare news releases and fact sheets and publish articles on the corrective measures design once it is proposed and approved.

- Hold informal community meetings, if necessary, to discuss proposed and/or final corrective measures design.

**During Corrective Measures:**

- Continue to publicize the environmental contact person and information repository.
- Update the mailing list, as necessary.
- Continue to update the community through fact sheets to those on the mailing list, media releases, and the base newspaper.
- Continue to update local officials and community leaders, as necessary.
- Review and, if necessary, revise the CRP to reflect any changes in public concern over the environmental program.

**Upon Completion of Corrective Measures:**

- Update information repository, as necessary.
- Update local officials and community leaders, as necessary.
- Publicize corrective measures completion through news releases to local media, and/or a fact sheet.
- Hold informal community meetings, if necessary, to discuss corrective measures completion.

**Interim Measure/Removal Action Activities:**

- Continue to publicize environmental point of contact.
- Update information repository, as necessary.
- Write responses to significant comments.

When following general distribution procedures, fact sheets will be sent to all addresses on the mailing list. News releases are intended only for the media and will be sent to news organizations on the mailing list. Any information released to the media in a news release also will be released as a fact sheet for distribution to others on the mailing list.

### **Summary of Community Relations Under BRAC**

BRAC is legislation that mandates transferring property from military to civilian ownership, but it does not specifically govern the processes under which environmental testing and cleanup are done. Therefore, the RCRA process detailed in Section 3.2 is simply focused first onto the areas to be transferred and then accelerated under BRAC to ensure the swift and easy transition of property from military to civilian uses. The same procedures are followed for both BRAC and non-BRAC property except for the increased effort to incorporate citizens in information-sharing and decision-making processes. For this reason, the RAB has been formed with additional community members and a focus on transferring property to the community. All its meetings will be open to the public, as both audience and participant.

## **7.0 CONCLUSION**

The steps outlined in this CRP are designed to achieve effective communication and a timely exchange of information between the public and the local and national representatives of DOD. The NAS Memphis PAO will monitor community response to the base's environmental activities and update this document and accompanying plans as needed.

**APPENDIX A**

**MAILING LIST**

- PART I U.S. CONGRESSIONAL DELEGATION
- PART II STATE AND LOCAL GOVERNMENT
- PART III LOCAL MEDIA
- PART IV RESTORATION ADVISORY BOARD
- PART V PRIVATE CITIZENS

**PART I**

**U.S. CONGRESSIONAL DELEGATION**

**Senate**

The Honorable Jim Sasser  
167 N. Mid America Mall, #390  
Memphis, Tennessee 38103

The Honorable Harlan Mathews  
403 Federal Building  
Memphis, Tennessee 38013

**House of Representatives**

The Honorable Don Sundquist  
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Memphis, Tennessee 38134

The Honorable John Tanner  
2836 Coleman Road  
Memphis, Tennessee 38128

The Honorable Harold Ford  
167 N. Mid America Mall, #369  
Memphis, Tennessee 38103

## **PART II**

### **STATE AND LOCAL GOVERNMENT**

#### **Governor**

The Honorable Ned McWherter  
170 N. Mid America Mall, #369  
Memphis, Tennessee 38103

#### **State Senate**

Senator Tom Leatherwood  
9139 Valkrie Lane  
Bartlett, Tennessee 38134

#### **State Representative**

Representative Ed Haley  
1045 Mullins Station Road  
Memphis, Tennessee 38134

#### **Area Mayors**

Mayor W.W. Herenton  
Mayor of Memphis  
125 N. Mid America Mall  
Millington, Tennessee 38103

Mayor William N. Morris, Jr.  
Mayor of Shelby County  
160 N. Mid America Mall  
Memphis, Tennessee 38103

Honorable George Harvell, Jr.  
Mayor of Millington  
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#### **City of Millington Aldermen**

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Millington, Tennessee 38053

Donald Moncier  
6947 Saddlebrook  
Millington, Tennessee 38053

Linda Carter  
4793 Easley Street  
Millington, Tennessee 38053

## PART III

### LOCAL MEDIA

#### Print Media

*The Bartlett Express*  
2874 Shelby Street  
Bartlett, Tennessee 38134

*Bluejacket*  
7800 Third Avenue  
Bldg. S-1, Rm. 223  
NAS Memphis  
Millington, TN 38054

*Collerville Herald*  
139 Main Street  
Collierville, Tennessee 38017

*The Commercial Appeal*  
495 Union Avenue  
Memphis, Tennessee 38103

*Covington Leader*  
2001 Highway 51, South  
Covington, Tennessee 38019

*The Daily News*  
P.O. Box 3663  
Memphis, Tennessee 38173

*The Evening Times*  
111 East Bond  
West Memphis, Arkansas 72301

*The Germantown News*  
7545 North Street  
Germantown, TN 38138

*Memphis Business Journal*  
88 Union Avenue  
Suite 102  
Memphis, TN 38103

*Millington Star*  
5107 Easley Street  
Millington, TN 38053

#### Broadcast Media

KRNB Radio  
80 N. Tillman  
Memphis, Tennessee 38111

KSUD Radio  
104 N. 5th  
West Memphis, Arkansas 72301

WHRK-WDIA Radio  
112 Union Avenue  
Memphis, Tennessee 38103

WGKX Radio  
5900 Poplar Avenue  
Memphis, Tennessee 38119

WHBQ Radio  
485 S. Highland  
Memphis, Tennessee 38111

WLOK Radio  
363 S. Second Street  
Memphis, Tennessee 38103

WMC AM/FM Radio  
1960 Union Avenue  
Memphis, Tennessee 38104

WRVR Radio  
5904 Ridgeway Parkway  
Memphis, Tennessee 38119

WREG-TV  
803 Channel 3 Drive  
Memphis, Tennessee 38103

WKNO FM 91.1  
900 Getwell Road  
Memphis, Tennessee 38111

WREC-WZXR Radio  
203 Beale Street  
Memphis, Tennessee 38103

WMC-TV  
1960 Union Avenue  
Memphis, Tennessee 38104

WHBQ-TV  
485 S. Highland  
Memphis, Tennessee 38111

WYPL FM 89.3  
Attn: Mike Porter  
1850 Peabody  
Memphis, Tennessee 38104-4025

**PART IV**

**RESTORATION ADVISORY BOARD**

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Jack Huffman  
Van Biggs  
Keith Costo  
Joyce Waters  
Ginny Music  
Neil Cordell  
Steven Custer  
Jim Crow

Pat Casey  
Clarence Roland  
Walter Johnson  
W.S. Howard  
Richard Hodges  
Terry Horne  
Zeke Hilton  
Ronald Ridings  
Harry Hix  
Carey Parham  
Phil Massey  
Louella Barlow  
Gary Tate

**APPENDIX B**

**GLOSSARY**

## HAZARDOUS WASTE INVESTIGATION GLOSSARY

- AA Assistant Administrator, USEPA  
[The AA reports directly to the Administrator of the USEPA.]
- ACL Alternate Concentration Limit; see MCL
- AM Action Memorandum  
[A memorandum that initially proposes and supports the decision to initiate activities at a site.]
- ANPRM Advanced Notice of Proposed Rulemaking  
[Request for public input prior to a proposed rulemaking. For example, the notice will highlight regulations to revise the current hazard ranking system (HRS).]
- AO Office of the Administrator, USEPA
- AOC Administrative Order on Consent  
[A legal and enforceable agreement signed between USEPA and potentially responsible parties (PRPs) whereby PRPs agree to perform or pay the cost of site cleanup. The agreement describes actions to be taken at a site and may be subject to a public comment period. Unlike a consent decree, an administrative order on consent does not have to be approved by a judge]
- ARAR Applicable or Relevant and Appropriate Requirement (ARARs)  
[Other regulations that can be applied to the cleanup]
- ATSDR Agency for Toxic Substances and Disease Registry (See HHS)
- CA Cooperative Agreement  
[An agreement between the USEPA and a federal agency or a State or Territory that describes activities to be performed by both parties that details the funding details to support those activities. Generally, these are developed on a site-specific basis.]
- CAA Clean Air Act
- CEPP Chemical Emergency Preparedness Program  
[A program outlined to increase community awareness and to stimulate the development of emergency plans for dealing with chemical accidents.]

- CD Consent Decree  
[A Legal document, approved and issued by a judge, that formalizes an agreement reached between USEPA and potentially responsible parties (PRPs) where PRPs will perform all or part of a Superfund site cleanup. The consent decree describes actions that PRPs are required to perform and is subject to a public comment period]
- CERCLA SUPERFUND: Comprehensive Environmental Response, Compensation and Liability Act (of 1980), as amended; 42 U.S.C. SS9601 et seq. (See also SARA).  
[Establishes the Superfund program and Trust Fund.]
- CERCLIS Comprehensive Environmental Response, Compensation & Liability Information System.  
[A complete record of all site discoveries, preliminary assessments, site investigations and hazard rankings. This list shows site names, locations, activity and completion data (year preceding month); lead agency if different from PA appears in parentheses.].
- CFR Code of Federal Regulations
- CLP Contract Laboratory Program
- CMA Chemical Manufacturers Association
- CMI Corrective Measures Implementation  
[Corrective Measures Implementation designs, constructs, and operates maintenance and monitoring of the performance of the corrective measure or measures selected.
- CMS Corrective Measures Study  
[Corrective Measures Study develops and evaluates corrective measures alternatives. This study recommends the most appropriate corrective measure.]
- COE U. S. Army Corps of Engineers (part of DOD)  
[Provides Superfund technical assistance including design and construction activities.]
- CWA Clean Water Act
- DERP Defense Environmental Restoration Program  
[The DOD SUPERFUND program]
- EA Endangerment Assessment  
[A study conducted as supplement to a remedial investigation to determine the nature and extent of contamination at a Superfund site and the risks posed to public health and/or the environment. USEPA or State agencies conduct the study when legal action is pending to require potentially responsible parties to perform or pay for the site cleanup.]

ERCS	Emergency Response Cleanup Services [Contractor support to USEPA for actual cleanup work at emergency (removal) actions.]
ERNS	Emergency Response Notification System
EROD	Enforcement Record of Decision [A ROD prepared by OWPE.]
ERRIS	Emergency and Remedial Response Information System [An automated information system that summarizes basic descriptions of all sites identified as being potentially hazardous. The NPL is a subset of this system.]
ERT	Environmental Response Team [A branch of the Hazardous Response Support Division of OERR located in Edison, NJ and Cincinnati, OH]
FIT	Field Investigation Team [Contractor support to USEPA that performs preliminary assessment, site inspection and hazard ranking activities.]
FS	Feasibility Study [See RI/FS]
FWPCA	Federal Water Pollution Control Act
HHS	Department of Health and Human Services [Responsible for providing public health assistance to Superfund sites and at other releases of hazardous materials. Section 104(i) of CERCLA establishes the Agency for Toxic Substances and Disease Registry under HHS to implement the health related authorities of CERCLA.]
HMTA	Hazardous Materials Transportation Act, 49 U.S.C. SS1801 <u>et seq.</u>
HRS	Hazard Ranking System [A scoring system used to evaluate potential relative risks to public health and the environment from released or threatened release of hazardous substances. USEPA and the States use the HRS to calculate a site's score, from 0 to 100, based on the actual or potential release of hazardous substances from a site through air, surface water, or ground water to affect people. This score is the primary factor used to decide if a site should be placed on the National Priorities List]
HSWA	Hazardous and Solid Waste Amendments of RCRA [That portion of RCRA which contains the corrective actions requirements]
IM	Interim Measures [Corrective actions to stabilize, control, or limit further releases. Interim measures can be imposed at any point in the process.]

- IRM**            **Initial Remedial Measures**  
[Remedial measures that are straightforward, relatively simple and require little or no engineering design, and are needed as a component of all considered remedial actions. These measures are generally used to stabilize the site or to remove immediate hazards.]
- LUST**           **Leaking Underground Storage Tanks**  
["LUST program"; Part of RCRA, regulates underground storage tanks.]
- MCL**            **Maximum Contaminant Level**  
[A criterion — as a groundwater cleanup standard at Superfund Sites.]
- MCLG**           **Maximum Contaminant Level Goal**
- NCP**            **National Contingency Plan (National Oil and Hazardous Substances Pollution Contingency Plan)**  
[40 CFR 300, the comprehensive regulations and guidelines for cleaning up hazardous waste sites and spills of hazardous and toxic materials. This document defines the authorities of agencies and their representatives.]
- NPL**            **National Priorities List**  
[USEPA's list of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial response using money from the Trust Fund. The list is based primarily on the score a site receives on the Hazard Ranking System (HRS). USEPA is required to update the NPL at least once a year.]
- NPDES**           **National Pollutant Discharge Elimination System**
- NRC**            **National Response Center**  
[The center operated by the U.S Coast Guard which receives and evaluates reports of oil and hazardous substance releases into the environment and notifies the appropriate agency(s). The NRC can be contacted 24 hours a day. 24 hour telephone service: (800)-424-8802 and (202)-426-2675]
- NRDC**           **Natural Resources Defense Council**
- NRT**            **National Response Team**  
[Representatives of 12 Federal agencies (USEPA, DOT, DOC, DOD, DOE, OOI, DOJ, DOL, DOS, FEMA, HHS, and USDA) that coordinate Federal responses to nationally significant pollution incidents and provide advice and technical assistance to the responding agency(s).]

OERR	The SUPERFUND OFFICE AT USEPA: Office of Emergency and Remedial Response (part of USEPA) [The Office under OSWER with responsibilities for implementing remedial and removal activities under CERCLA (Superfund).]
OSC	On-Scene Coordinator [The Federal official in charge of site-specific emergency (removal) response activities. These people are generally Regional USEPA or Coast Guard personnel.]
OSW	Office of Solid Waste [The office in USEPA which manages the RCRA program.]
OSWER	Office of Solid Waste and Emergency Response (part of USEPA) [The office of the Asst. Administrator within USEPA that manages both SUPERFUND and RCRA.]
OWPE	Office of Waste Programs Enforcement in USEPA [The ENFORCEMENT office under OSWER in USEPA for RCRA and CERCLA.]
PA	Preliminary Assessment [A study that obtains the data necessary to determine the Hazard Ranking score.]
PCB	PCBs; Polychlorinated Biphenyls (TSCA/CERCLA)
POTW	Publicly Owned Treatment Works
PRP	Potentially Responsible Party [Any individuals or company(s) (such as owners, operators, transporters, or generators) potentially responsible for, or contributing to, the contamination problems at a Superfund site. Whenever possible, USEPA requires PRPs through administrative and legal actions, to clean up hazardous waste sites they have contaminated.]
QA/QC	Quality Assurance/Quality Control [A system of procedure checks, audits, and corrective actions used to ensure that field work and laboratory analysis during the investigation and cleanup of the Superfund sites meet established standards]
RA	Remedial Action [The actual construction or implementation phase that follows the remedial design of the selected cleanup alternative at a site on the National Priorities List]
RA	Regional Administrator [Administrator of each of USEPA's ten regions.]

- RMP Remedial Action Master Plan  
[A planning document that summarizes current conditions at the site, evaluates existing data, identifies required activities and projects schedules and budgets for completing Remedial Investigation, Feasibility Study, and any Initial Remedial Measures. These activities are now being included as the initial activities of the Remedial Investigation.]
- RAP Remedial Accomplishments Plan  
[A planning document that forecasts quarterly expenditures for Remedial Activities.]
- RCRA Resource Conservation and Recovery Act; of 1976 as amended, 42 U.S.C. SS6901 et seq.  
[A Federal law that established a regulatory system to track hazardous substances from the time of generation to disposal. The law requires safe and secure procedures to be used in treating, transporting, storing, and disposing of hazardous substances. RCRA is designed to prevent new, uncontrolled hazardous waste sites.]
- RD Remedial Design  
[An engineering phase that follows Record of Decision when technical drawings and specifications are developed for the subsequent remedial action at a site on the National Priorities List.]
- REAP Regional Enforcement Accomplishments Plan (later, part of SCAP)  
[A planning document that forecasts quarterly expenditures for Enforcement Activities.]
- REM Remedial Engineering Manager, or Remedial Action Contractor
- RFA RCRA Facility Assessment  
[The RCRA Facility Assessment identifies potential or actual contamination releases through a records review and visual examination of every SWMU.]
- RFI RCRA Facility Investigation  
[The RCRA Facility Investigation confirms contamination and determines its nature. The RFI also examines the extent and rate of any migration through the implementation of a work plan. It also provides baseline data for the evaluation of corrective measures.]
- RI/FS Remedial Investigation/Feasibility Study  
[Two distinct but related studies. They are usually performed at the same time, and together referred to as the "RI/FS." They are intended to:
- \* Gather the data necessary to determine the type and extent of contamination at a Superfund site,
  - \* Establish criteria for cleaning the site,
  - \* Identify and screen cleanup alternatives for remedial action, and
  - \* Analyze in detail the technology and costs of the alternatives.]

- ROD** Record of Decision  
[The decision document, signed by the Assistant Administrator of OSWER, that formally identifies the cost-effective cleanup option, (or response action) required to remedy release of hazardous substances.]
- RPM** USEPA Remedial Project Manager  
[The USEPA or State official responsible for overseeing remedial response activities.]
- RQ** Reportable Quantity
- RRT** Regional Response Team  
[Regional representatives of the Agencies of the NRT. Activities are described more fully in the NCP.]
- RSPO** Regional Site Project Officer  
[The person in charge of site-specific remedial response activities. These people are generally Regional USEPA personnel.]
- SARA** Superfund Amendments and Reauthorization Act; of 1986, 42 U.S.C. SS9601.  
[Modifications to CERCLA which reauthorized the Superfund and created the DOD site cleanup program known as DERP, Defense Environmental Restoration Program.]
- SCAP** Superfund Comprehensive Accomplishments Plan  
[Manual which consolidates the regional reporting duties of the Office of Emergency & Remedial Response (OERR) and the Office of Waste Programs Enforcement (OWPE). The plan also outlines priority activities under SARA and highlights programmatic considerations that should be used as a guide.]
- SI** Site Inspection  
[A technical phase that follows a preliminary assessment designed to collect more extensive information on a hazardous waste site. The information is used to score the site with the Hazard Ranking System to determine whether response action is needed.]
- SWDA** Solid Waste Disposal Act; 42 U.S.C. SS6901.  
[The RCRA predecessor.]
- SWMU** Solid Waste Management Unit  
[A Solid Waste Management Unit is defined as "any discernable waste management unit from which hazardous constituents may migrate, regardless of whether the unit was intended for the management of solid or hazardous wastes."]
- TAT** Technical Assistance Team  
[USEPA contractor support team for assistance and oversight during emergency response activities.]

**TSDF** Treatment, Storage, and Disposal Facilities ("TSDFs")  
[Any building, structure, or installation where a hazardous substance has been treated, stored or disposed. TSD facilities are regulated by USEPA and States under the Resource Conservation and Recovery Act.]

**USEPA** United States Environmental Protection Agency  
[Given the lead responsibility for implementation and oversight of programs under CERCLA by Executive Order. Also jointly responsible for implementation of BRAC environmental programs.]

**APPENDIX C**

**SUMMARY OF QUESTIONNAIRE & RESPONSES**

## SUMMARY OF QUESTIONNAIRE & RESPONSES

**Question:**

An environmental investigation, which is part of the Navy's Installation Restoration Program, is being conducted on board NAS Memphis. Have you heard about this?

If so, how did you hear about it?

**Responses:** The responses were split almost evenly among the 33 participants. Seventeen people said that they had heard about the investigation, while 16 said they had no knowledge of it. Most of the participants with knowledge of the investigation learned about it through contacts at their place of employment. The sources cited for information were as follows:

Personal Contacts . . . . . 3	Personal Contacts/Work . . . . . 1
Work . . . . . 10	Media/Personal Contacts . . . . . 1
Media . . . . . 1	All of the above . . . . . 1

**Question:**

Are you familiar with NAS Memphis, specifically in the following areas:

- History
- Number of Employees
- Mission
- Size (Area it covers)

<b>Responses:</b>	<b>Yes</b>	<b>No</b>
History . . . . .	29	4
Mission . . . . .	33	0
# of Employees . . . . .	21	12
Size . . . . .	14	19

**Question:**

What/who is your source for information about NAS Memphis?

**Responses:** Most of the participants receive information about the base through personal and business contacts. Several people had multiple sources for information. Responses included the following:

Personal Contacts . . . . .	22
Bluejacket . . . . .	10
Other media . . . . .	4
Public Affairs Office . . . . .	3
No specific source . . . . .	1

**Question:**

Are you familiar with base environmental programs or the following nationwide programs?

- The Installation Restoration Program
- The National Priorities List
- Superfund

<b>Responses:</b>	<b>Yes</b>	<b>No</b>
IRP . . . . .	14 . . . . .	19
NPL . . . . .	16 . . . . .	17
Superfund . . . . .	27 . . . . .	6

**Question:**

Who/What is your source for this kind of information about NAS Memphis?

**Responses:** Nineteen participants cited personal/business contacts as their source for environmental information. The media was mentioned by 5 people and 9 others had no available source.

**Question:**

What issues/concerns/activities related to environmental work at NAS Memphis interest you most?

**Responses: ( More than one response given by some interviewees)**

Groundwater contamination . . . . .	3	Trash . . . . .	1
Noise pollution . . . . .	4	Asbestos . . . . .	1
Firefighter training/pollution . . . . .	4	Reclamation Program . . . . .	1
Sewage line odor . . . . .	1	Lead Paint/housing . . . . .	1
Joint-use plan . . . . .	1	Radon gas . . . . .	1
Old landfills . . . . .	1	None . . . . .	16

**Question:**

Have you had any contact with NAS Memphis officials or personnel about any type of concern? If so, who were they, what was the response provided to you and were you satisfied with the response?

**Responses:** Most of the participants (26) had not expressed any concerns to NAS Memphis officials or personnel. Seven people indicated contact with base officials about some type of concern with all but one satisfied with their response.

**Question:**

Do you feel there are any problems in the area that could be attributable to an environmental concern?

**Responses:**

None . . . . .	14	Groundwater contamination . . .	2
Firefighter training/smoke . . . . .	3	Pulvair Pesticide Plant . . . . .	5
Chickasaw Ordnance Plant . . . . .	1	Jet exhaust . . . . .	1
Old power plant . . . . .	2	Don't know . . . . .	5

The majority of these concerns are generated by off-base activities. Pulvair Industrial Plant is a widely-publicized Superfund site.

**Question:**

Do you feel NAS Memphis is conducting operations in an environmentally safe manner?

**Responses:** Twenty-eight respondents felt the base was conducting operations in an environmentally safe manner. One "yes" was qualified by belief that operations are safe now but probably not in the past. One person answered "no" stating that there are "too many hazardous sites." Four people answered, "I don't know."

**Question:**

In your opinion, how sensitive is the community to environmental issues?

**Responses:**

Very . . . . .	10
Fairly . . . . .	19
Little . . . . .	3
Not at all . . . . .	1

**Question:**

In your opinion, how does the public view the Navy's presence in the area?

**Responses:**

Excellent . . . . .	21
Good . . . . .	10
Fair . . . . .	2
Negative . . . . .	0

**Question:**

What types of issues attract the attention of the community?

**Responses:** Concern about the economy and jobs ranked first with 15 responses followed by military cutbacks/base closure with 10 responses. Other responses included noise/air pollution, crime, the joint-use airfield project, child care politics, housing, health care, drugs and taxes.

**Question:**

Do you have any suggestions or ideas about ways in which we can keep the community informed about the IRP and other environmental activities?

**Responses:**

Media . . . . .	19	School Program . . . . .	1
Speakers . . . . .	2	Cable TV . . . . .	1
Flyers w/phone bills . . . . .	1	City Beautiful . . . . .	1
Newsletters . . . . .	1	Forums . . . . .	1
No Response . . . . .	6		

**Question:**

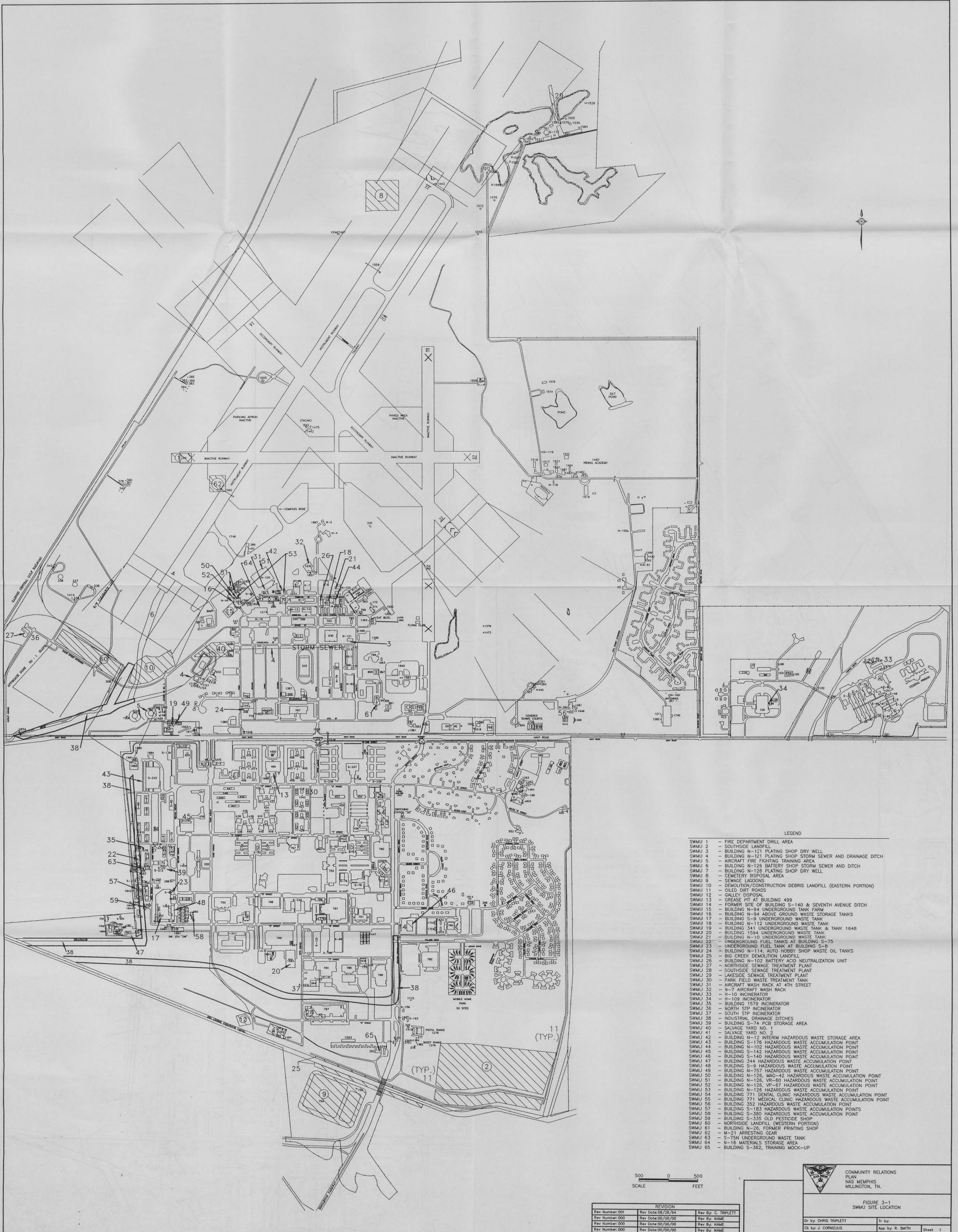
Do you have a recommendation on where to locate an information repository pertaining to environmental work?

**Responses:** Based on 16 responses, the Millington Public Library was selected for the information repository. Other recommendations included city hall, the post office and the Chamber of Commerce.

**Responses:** Thirty-two names were added to the mailing list. One person declined to receive additional information.

**Question:**

Would you like to be included on our mailing list to receive further information about the IRP?



- LEGEND
- SWMU 1 - FIRE DEPARTMENT DRILL AREA
  - SWMU 2 - SOUTH SIDE LANDFILL
  - SWMU 3 - BUILDING N-121 PLATING SHOP DRY WELL
  - SWMU 4 - BUILDING N-121 PLATING SHOP STORM SEWER AND DRAINAGE DITCH
  - SWMU 5 - AIRCRAFT FIRE FIGHTING TRAINING AREA
  - SWMU 6 - BUILDING N-126 BATTERY SHOP STORM SEWER AND DITCH
  - SWMU 7 - BUILDING N-126 PLATING SHOP DRY WELL
  - SWMU 8 - CEMETERY DISPOSAL AREA
  - SWMU 9 - SEWAGE LAGOONS
  - SWMU 10 - DEMOLITION/CONSTRUCTION DEBRIS LANDFILL (EASTERN PORTION)
  - SWMU 11 - OILED DIRT ROADS
  - SWMU 12 - GALLEY DISPOSAL
  - SWMU 13 - GREASE PIT AT BUILDING 499
  - SWMU 14 - FORMER SITE OF BUILDING S-140 & SEVENTH AVENUE DITCH
  - SWMU 15 - BUILDING N-94 UNDERGROUND TANK FARM
  - SWMU 16 - BUILDING N-94 ABOVE GROUND WASTE STORAGE TANKS
  - SWMU 17 - BUILDING S-9 UNDERGROUND WASTE TANK
  - SWMU 18 - BUILDING N-112 UNDERGROUND WASTE TANK
  - SWMU 19 - BUILDING 341 UNDERGROUND WASTE TANK & TANK 1648
  - SWMU 20 - BUILDING 1594 UNDERGROUND WASTE TANK
  - SWMU 21 - BUILDING N-10 UNDERGROUND WASTE TANK
  - SWMU 22 - UNDERGROUND FUEL TANKS AT BUILDING S-75
  - SWMU 23 - UNDERGROUND FUEL TANK AT BUILDING S-4
  - SWMU 24 - BUILDING N-114, AUTO HOBBY SHOP WASTE OIL TANKS
  - SWMU 25 - BIG CREEK DEMOLITION LANDFILL
  - SWMU 26 - BUILDING N-102 BATTERY ACID NEUTRALIZATION UNIT
  - SWMU 27 - NORTH SIDE SEWAGE TREATMENT PLANT
  - SWMU 28 - SOUTH SIDE SEWAGE TREATMENT PLANT
  - SWMU 29 - LAKE SIDE SEWAGE TREATMENT PLANT
  - SWMU 30 - PARK FIELD WASTE TREATMENT TANK
  - SWMU 31 - AIRCRAFT WASH RACK AT 4TH STREET
  - SWMU 32 - N-7 AIRCRAFT WASH RACK
  - SWMU 33 - N-10 INCINERATOR
  - SWMU 34 - N-09 INCINERATOR
  - SWMU 35 - BUILDING 1579 INCINERATOR
  - SWMU 36 - NORTH STP INCINERATOR
  - SWMU 37 - SOUTH STP INCINERATOR
  - SWMU 38 - INDUSTRIAL DRAINAGE DITCHES
  - SWMU 39 - BUILDING S-74 PCB STORAGE AREA
  - SWMU 40 - SALVAGE YARD NO. 1
  - SWMU 41 - SALVAGE YARD NO. 2
  - SWMU 42 - BUILDING N-112 INTERIM HAZARDOUS WASTE STORAGE AREA
  - SWMU 43 - BUILDING S-176 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 44 - BUILDING N-102 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 45 - BUILDING S-142 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 46 - BUILDING S-140 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 47 - BUILDING 344 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 48 - BUILDING S-9 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 49 - BUILDING N-757 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 50 - BUILDING N-126, MAG-42 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 51 - BUILDING N-126, VR-60 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 52 - BUILDING N-126, VP-67 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 53 - BUILDING N-126 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 54 - BUILDING 771 DENTAL CLINIC HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 55 - BUILDING 771 MEDICAL CLINIC HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 56 - BUILDING 352 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 57 - BUILDING S-183 HAZARDOUS WASTE ACCUMULATION POINTS
  - SWMU 58 - BUILDING S-380 HAZARDOUS WASTE ACCUMULATION POINT
  - SWMU 59 - BUILDING S-335 OLD PESTICIDE SHOP
  - SWMU 60 - NORTH SIDE LANDFILL (WESTERN PORTION)
  - SWMU 61 - BUILDING N-26, FORMER PRINTING SHOP
  - SWMU 62 - M-21 ARRESTING GEAR
  - SWMU 63 - S-75N UNDERGROUND WASTE TANK
  - SWMU 64 - N-16 MATERIALS STORAGE AREA
  - SWMU 65 - BUILDING S-362, TRAINING MOCK-UP

REVISION		
Rev Number: 001	Rev Date: 08/26/94	Rev By: C. TRIPLETT
Rev Number: 000	Rev Date: 00/00/00	Rev By: NAME
Rev Number: 000	Rev Date: 00/00/00	Rev By: NAME
Rev Number: 000	Rev Date: 00/00/00	Rev By: NAME
Rev Number: 000	Rev Date: 00/00/00	Rev By: NAME

COMMUNITY RELATIONS  
PLAN  
NAS MEMPHIS  
MILLINGTON, TN.

FIGURE 3-1  
SWMU SITE LOCATION

Dr by: CHRIS TRIPLETT      Tr by:  
Ck by: J. CORNELIUS      App by: R. SMITH      Sheet 1  
Date: 08/30/94      DWG Name: 016EM1      Of 1