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NSA MID SOUTH
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LETTER TRANSMITTING APPROVAL OF CLASS V UNDERGROUND INJECTION WELL AT
SOLID WASTE MANAGEMENT UNIT 7 AND LISTING APPROVAL CONDITIONS
MILLINGTON SUPPACT TN
5/12/2005
STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION



Handwritten signature or initials.

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER SUPPLY
GROUND WATER MANAGEMENT SECTION
9th Floor, 401 Church Street
Nashville, Tennessee 37243-1539
Phone: (615) 532-0191; Fax: (615) 532-0503

May 12, 2005

Commanding Officer
Attention: Mr. Jim Heide
Public Works Office Environmental Division
NSA Mid-South
5722 Integrity Drive
Millington, Tennessee 38054-500

RE: Class V Underground Injection Permit Application Modification
NSA Mid-South
Millington, Shelby County, Tennessee
UIC File # SHE-0000009

Mr. Heide:

The Division of Water Supply has reviewed your Interim Measures Progress Report and attached letter requesting additional modifications to the November 13, 2003 Class V Underground Remedial Injection Well Application Approval for NSA Mid South SWMU #7, Millington, Shelby County, Tennessee. The Division approves your additionally proposed remedial modifications dated April 22, 2005.

The conditions of the modification approval are as follows:

1. Approval is for a time period not to exceed two years. If the injection is to be continued beyond this timeframe, a new permit application, which includes all sampling results obtained during the remedial action, should be submitted.
2. Groundwater monitoring should be conducted as specified in the Tennessee Division of Solid/Hazardous Waste Management (TDS/HWM) permit TNHW-094 Corrective Action Work Plan.

Mr. Jim Heide
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3. The previously approved enhanced bioremediation with monitored natural attenuation by injecting water amended with sodium acetate salt, ammonium monophosphate, and rhodamine WT dye should not exceed the concentrations specified in the TDS/HWM Corrective Action Work Plan, nor should the volume of injected fluid exceed the volume specified in the TDS/HWM Corrective Action Work Plan.

If at any time the Division learns that a ground water discharge system may be in violation of The Tennessee Water Quality Control Act, the Division shall:

- a. require the injector to apply for an individual permit;
- b. order the injector to take such actions including, where required, closure of the injection well as may be necessary to prevent the violation; or
- c. take enforcement action.

All groundwater discharge activities must operate in such a manner that they do not present a hazard to groundwater.

The owner/operator shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the owner/operator to achieve compliance with the conditions of this authorization. Proper operation and maintenance include effective performance, adequate funding, and appropriate quality assurance procedures.

The issuance of this authorization does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, State, or local laws or regulations.

If the owner/operator becomes aware that he failed to submit any relevant facts in an authorization application, or submitted incorrect information in an authorization application or in any report to the Division, then he shall promptly submit such facts or information.

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The owner/operator shall give notice to the Division as soon as possible of any planned physical alterations or additions to the authorized facility or activity, which may result in noncompliance with authorization requirements. The owner/operator shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the owner/operator to achieve compliance with the conditions of this authorization. Proper operation and maintenance included effective performance, adequate funding, and appropriate quality assurance procedures.

Knowingly making any false statement on any report required by the rule may result in the imposition of criminal penalties as provided in T.C.A. 69-3-115 of the Tennessee Water Quality Control Act.

The issuance of this authorization does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, State, or local laws or regulations.

The authorization to discharge is limited to the injection well(s). Discharge is also limited to a time period not to exceed two years and to the scope of work detailed in the Class V injection well application and the TDS/HWM Corrective Action Work Plan.

The TDS/HWM will be the lead regulatory agency on this project. All sampling and monitoring reports should be sent to the TDS/HWM. The Tennessee Division of Water Supply reserves the right to request the owner/operator to pull and have analyzed a sample from the system at any time the Department deems it necessary.

Our concurrence with your approach does not imply that this procedure is exempt from future changes or restrictions in the Underground Injection Control (UIC) Regulations, or any additional requirements set forth by the Division in order to protect the groundwater of Tennessee.

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A copy of this authorization must be kept on site until the corrective action has been completed and must be made available to inspection personnel.

Should you have any questions or comments please feel free to contact me at (615) 532-0180.

Sincerely,

A handwritten signature in black ink that reads "Bruce T. Craig, P.G." with a stylized flourish at the end.

Bruce T Craig, P.G.

Geologist

UIC Program

Division of Water Supply

c: Mr. Brian Caton, TDWS-Jackson RFO
Mr. John E. Stedman, EnSafe Inc.