

N00639.AR.002156
NSA MID SOUTH
5090.3a

LETTER REGARDING REQUEST FOR U S NAVY CONCURRENCE TO ADD, REMOVE AND
REPURPOSE WORK FOR THE RESOURCE CONSERVATION AND RECOVERY ACT
FACILITY INVESTIGATION REPORT FOR UNEXPLODED ORDNANCE1 1 AND AREA OF
CONCERN 1 MILLINGTON SUPPACT TN

5/14/2014

RESOLUTION CONSULTANTS

May 14, 2014

NAVFAC Mid-West
Mr. Chris Payton
Building 1A, 201 Decatur
Great Lakes, IL

Dear Mr. Payton:

Subject: Concurrence Letter
Navy CLEAN
Contract No. N62470-11-D-8013
Contract Task Order (CTO) F278
AOC 1 and UXO 1 RFI
Naval Support Activity (NSA) Mid-South, Millington, Tennessee

Dear Mr. Payton:

Resolution Consultants hereby requests NAVFAC Mid-West's concurrence to add, remove and repurpose work for CTO F271 at Naval Support Activity Mid-South; Millington, Tennessee. The task requirements have changed due to project evolution and anticipated regulatory requirements not coming to fruition; therefore, some of the originally scoped tasks will not be required while additional work will be required. The following work and schedule modifications are proposed to the CTO:

Removed Work

1. De-scope AR.HH and AR.ER – Human Health Risk Assessment and Ecological Risk Assessment

The proposed comprehensive ecological risk assessment scoped in the POA was not completed because the regulatory agency and the Navy determined this level of effort was not required to address the site. Instead, the Navy conducted an in-house screening ecological risk assessment as an internal BMP. The human health risk assessment did not include surface water, sediment, or groundwater media; therefore, a significantly smaller level of effort was required to complete this task.

2. De-scope FI.FK – Habitat Evaluation – This task supported the de-scoped Ecological Risk Assessment (discussed above) and is similarly no longer a scope item to be completed.

3. De-Scope FI.SW & FI.WI/WS – Surface Water/Sediment Sampling & Well Installation/Sampling

These three media were included in the POA but not sampled during the RFI due either to the absence of surface water and sediment and the Regulatory agreement that groundwater not be evaluated due to site conditions that did not indicate impact to that media.



The estimate cost of the removed work is \$61,300.

Re-Purposed Work

1. Scope Modification – EC.DR/DF/FR - Interim Measures Work Plan (IMWP)

An IMWP was originally proposed for the Pistol Range berm; however, a land use control remedy instead will be applied to the berm. The Navy intends to conduct an alternate removal at the AOC 1 to address elevated lead levels in limited areas on the site as well as addressing the exposed clay pigeons on the pistol range berm. Therefore, the IMWP will be prepared for the area, with the same expected level of effort for the document preparation associated with the Pistol Range Berm removal action.

2. FS.AD, FS.DR/DF/FR - Feasibility Study/CMS

The POA assumed a traditional CMS; however due to Regulatory concurrence with a LUC remedy approach, a focused CMS will be required. The focused CMS will also be combined with a Corrective Measures Implementation Plan which will outline the LUC inspection requirements and certifications, and the Interim Measures removal discussed above. Combining the documents will expedite the document review and approval, and eventual site closeout. The alternative approach will have the same level of effort as originally funded Task.

The amount of this work being re-purposed is \$60,000, which has no impact on the over funding.

Added Work

1. LC.MS – LUC Support - Sign Placement and Select Plantings

As part of the LUC remedy, warning and information signs will be required around UXO 1 and AOC 1. The modification assumes signs will be purchased and constructed at strategic locations around the Sites, at locations specified by the Activity and presented in the focused CMS. Signs will meet regulatory and base installation and manufacturing requirements.

Additionally, select plantings of native plant species (bushes) will be placed within the open areas to discourage site trespassers while UXO 1 and AOC 1 remain fallow and natural undergrowth is established. The task assumes approximately 3 acres will require plantings using three-foot centers. Plant purchases, labor for planting, and a one-time follow-up/inspection are included in this task. Planting recommendations from the Tennessee Wildlife Resources Agency for thicket establishment will be used for native plant species selections, in consultation with NSA Mid-South.

2. DD.DF/DR/FP/MS – Decision Documents - RCRA Permit Modification

The Base's RCRA permit will require modification to memorialize the final UXO 1 and AOC 1 remedy. This task will consist of revising the existing permit with the approved LUCs and inspection/certification requirements and covering any fees applicable to the revisions to support this action. Any supplementary site-closeout documents will also be included in this Task.

