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LETTER OF APPROVAL FROM TENNESSEE DEPARTMENT OF ENVIRONMENT AND
CONSERVATION TO CONDUCT FOUR MOBILE ENHANCED MULTI-PHASE EXTRACTION
(MEME) EVENTS MILLINGTON SUPPACT TN
01/25/1999
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT. MORIAH
MEMPHIS, TENNESSEE 38115-1520**

January 25, 1999

Mr. Randy Wilson
Public Works Division - Environmental Department
Code: 101, 5720 Integrity Drive
Millington, TN 3054-5045

RE: Mobile Enhanced Multi-phase Extraction - Approved
Exchange Service Station, Bldg. 341
Naval Air Station, Millington, TN
Facility ID #0-791718, Shelby County

Dear Mr. Wilson:

The Division of Underground Storage Tanks has received the request to perform a Mobile Enhanced Multi-phase Extraction (MEME) treatment at the above referenced facility. The request received December 28, 1998 was submitted by BAT Associates, Inc. Four MEME events are approved by the Division for implementation.

If this Site is Fund eligible, the cost estimate and the reimbursement application will be reviewed concurrently. The Division will only reimburse reasonable costs associated with the investigation and cleanup of the site. However, be advised that certain items that appeared on the cost proposal submitted with the application are not considered reasonable by the Division. The amount reimbursed shall be based on the review of actual charges submitted in the reimbursement application and the responsible party having met all the requirements of Rule 200-1-15.09(11).

Federal, state, and local requirements must be observed while treating and disposing of contaminated soil and/or groundwater.

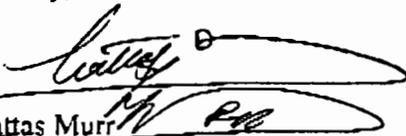
Mr. Randy Wilson
January 25, 1999
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A brief report shall be submitted to the Division by February 25, 1999, March 25, 1999, April 25, 1999 and May 25, 1999. These reports shall be submitted in accordance with Technical Guidance Document (TGD)-016. This office shall be notified at least 24 hours prior to field activities. Send one copy of all correspondence, including reports, to this office and one copy to:

Tennessee Department of Environment and Conservation
Division of Underground Storage Tanks
4th Floor, L&C Tower
401 Church Street
Nashville, Tennessee 37243-1511

If you have any questions concerning this correspondence, call (901) 368-7973.

Sincerely,


Ghattas Murr
Division of Underground Storage Tanks

GEM\79049025\cp

c: Curtis Hopper Nashville Central Office, Technical Review Section
Memphis UST Field Office
Bat Associates Inc.

FOR OFFICIAL USE ONLY

23 December 1997

Code 1846

PRELIMINARY
DEPARTMENT OF THE NAVY
SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DRIVE, P.O. BOX 10068

CHARLESTON, SOUTH CAROLINA

29411-0068

Contract N62467-96 - D - 0976

STATEMENT OF WORK

NAVAL EXCHANGE SERVICE STATION NSA MEMPHIS
MILLINGTON, TENNESSEE
GROUNDWATER SAMPLING

SECTION 1. PROJECT DESCRIPTION AND BACKGROUND

- 1.1 The objective of this Scope of Work is to provide for two rounds of groundwater sampling at the Naval Exchange Service Station, Naval Support Activity (NSA) Memphis, Millington, TN.
- 1.2 The groundwater sampling is follow up action to the Mobile Enhanced Multi-phase Extraction (MEME) event and is to evaluate the effects of the MEME on the groundwater contaminants at this ~~former~~ UST site.
- 1.3 The aquifer at this site was previously classified as " Non Drinking " groundwater.

SECTION 2. SPECIAL INSTRUCTIONS

- 2.1 The AE shall prepare and then adhere to the sampling schedule.
- 2.2 The A/E will be responsible for obtaining all necessary permits and authorizations as needed.

- 2.3 A schedule for all field work shall be coordinated with the activity representatives (groundwater sampling event).
- 2.4 The A/E is responsible for recording all minutes of all meetings and providing a copy of the minutes to the Engineer-in-Charge (EIC) and other attendees of the meeting. Minutes shall be distributed within 10 days of the meeting date.
- 2.5 The A/E is responsible for obtaining permission and clearance from the appropriate station security personnel to enter and perform any necessary work.
- 2.6 The A/E shall forward submissions directly to the EIC and the activity's environmental coordinator.
- 2.7 The A/E shall be responsible for returning sampling sites back to their original condition after following each sampling event.
- 2.8 The A/E shall adhere to quality control limits established by TDEC for groundwater sampling.

SECTION 3. Applicable Documents

- 3.1 The following documents shall be used in performing the groundwater sampling:
 - 3.1.1 TN Department of Health and Environment
Division of Underground Storage Tanks, Chapter 1200-1-15
 - 3.1.2 Tennessee Department of Environment and Conservation
Division of Underground Storage Tanks
Environmental Assessment Guidelines, **January 1994**
 - 3.1.3 Division of Underground Storage Tanks
Technical Guidance Document -007 Effective Date: January 1, 1994
 - 3.1.4 Flammable and Combustible Liquids Code
NFPA, 30-1981, National Fire Codes and Standards, Latest Edition
 - 3.1.5 Recommended Practice for Handling Underground Leakage of Flammable and Combustible Liquids NFPA 329-1983, National Fire Codes, Latest Edition

SECTION 4. DESCRIPTION OF WORK

4.1 The duration of this groundwater monitoring to be for (1) year.

The Government has the option to extend the groundwater monitoring annually for additional (3) years.

4.2 The groundwater sampling protocol shall be in accordance with the TDEC Site Assessment Guidelines and:

4.2.1 Groundwater sampling shall be accomplished biannually.

4.2.2 The groundwater samples shall be taken from monitoring wells MEM-757-B1, -B2, -B3 – B4, and MEM-757-1 through 19, except MEM-757-15. This well is damaged and cannot be sampled. Location of the wells is shown on Fig.1. A total of (22) wells are to be sampled.

4.2.3 Water level measurements, well purging, groundwater sampling etc.... shall be in accordance with TDEC Environmental Assessment Guidelines, Jan. 1994. (See sections II.H, II.I, II.J, II.M, II.O)

4.2.4 The groundwater shall be analyzed for **BTEX** (EPA Method 8020), and TPH-GRO (EPA Method 8015) in accordance with TDEC Environmental Assessment Guidelines, Jan. 1994. (See section II.K).

4.2.5 Perform water level measurements in all the (22) monitoring wells. Data is needed to plot the potentiometric maps.

4.2.6 A report shall be prepared for each sampling event in accordance with TDEC TGD-007, enclosure (1). As a minimum include a discussion of the sampling event, tabulate the data present event and data from the May 1996 groundwater sampling event. The May 1996 data is available from EIC, SOUTHDIV. Four (4) copies of the report are required, (3) for NSA, and (1) for SOUTHDIV.

4.2.7 Laboratory analyticals and chain of custody shall be included in the report. One report shall include the original laboratory reports, signature page, etc.

4.2.8 The first groundwater sampling event to be performed a minimum of 21 days following the completion of the MEME event. The first sampling report is due 30 days after the completion of the fieldwork. The second sampling event and report is due (6) months later.

4.2.9 Purge water disposal. A/E shall dispose the monitoring well purge water at the NSA oil/water separator. The disposal to be coordinated with the NSA Environmental Coordinator. Disposal of all solid Investigative Derived Waste (IDW) to

be coordinated with the activity's Environmental Coordinator.

4.4 Health and Safety Plan (HASP) - The HASP is required for this groundwater sampling.

SECTION 5. ENCLOSURES

- (1) TDEC TGD-007, January 1994
- (2) Fig.I, Site Drawing
- (3) Table I, Water Level Elevations.

SECTION 6. ADDRESSES

6.1 Commanding Officer
ATTN: Code 1846
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, P.O. Box 190010
Charleston, SC 19419-9010

POC: John Karlyk
(803) 820-5624

6.2 Commanding Officer Naval Support Activity Memphis
ATTN: Code 01010
Millington, TN 38054

POC: Mr. Randy Wilson
(901) 874-5461