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NSA MID SOUTH
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STATEMENT OF BASIS SOLID WASTE MANAGEMENT UNIT 63 (SWMU 63) FORMER UNDERGROUND WASTE TANK MILLINGTON SUPPACT TN
11/01/2005
TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

STATEMENT OF BASIS

SWMU 63 — Former Underground Waste Tank
Naval Support Activity Mid-South
Millington, Tennessee

Purpose of the Statement of Basis

This Statement of Basis (SB) has been prepared to inform the public and provide an opportunity to comment on a proposed remedy at solid waste management unit (SWMU) 63 — Former Underground Waste Tank at Naval Support Activity (NSA) Mid-South, Millington, Tennessee. NSA Mid-South is responsible for corrective action at SWMU 63, as required by a Resource Conservation and Recovery Act (RCRA) permit. The Tennessee Department of Environment and Conservation (TDEC) has determined that the proposed remedy of No Further Action is protective of human health and the environment.

Before the remedy is finalized TDEC would like to give the public an opportunity to comment on the proposed remedy. At any time during the comment period, the public may comment as described in the following section "How Can You Participate?" Upon closure of the public comment period, TDEC will evaluate all comments and determine if there is a need to modify the proposed remedy.

Site Description

SWMU 63, on NSA Mid-South's Southside (Figure 1) consists of an approximately 7-foot by 7.5-foot area adjacent to the southwest corner of Building S-75 (boiler plant) that formerly contained a 65-gallon, stainless steel underground waste tank. The waste tank was removed in April 1992 and no soil contamination was evident.

How Can You Participate?

TDEC solicits public review and comment on this SB prior to implementation of the proposed remedy as the final one. The final remedy for SWMU 63 — Former Underground Waste Tank will be incorporated in the Hazardous and Solid Waste Amendments Permit TNHW-094 for NSA Mid-South, scheduled to be updated in 2006.

Figure 1 SWMU 63 at NSA Mid-South in Millington, Tennessee

Public comment on this SB and the proposed remedy will begin on the date that a notice of the SB's availability is published in *The Millington Star* and *The Commercial Appeal*, local daily newspapers. Since community input could affect selection of a final remedy for SWMU 63, a public comment period has been established for 45 days from ***(insert date)***. If requested during the comment period, the TDEC will hold a public meeting to respond to any oral comments or questions regarding the proposed remedy. To request a hearing or to provide comments, contact the following person in writing within the 45-day comment period:

Mr. Roger Donovan
TDEC — Division of Solid Waste Management
5th Floor, L&C Annex
401 Church Street
Nashville, TN 37243-1538
Telephone: (615) 532-0864
E-mail: roger.donovan@state.tn.us

Investigative reports and documents related to SWMU 63 are referenced at the end of this SB and are included in the Administrative Record, which can be reviewed in the Information Repository that was established to provide public access to documents pertaining to the Navy's environmental program. The Information Repository is maintained at:

Millington Public Library
4858 Navy Road
Millington, Tennessee 38053
(901) 872-1585

Background Summary

Past operations at the former Naval Air Station (NAS) Memphis included metal plating, manufacturing, and other operations that involved the use of toxic and hazardous materials. Land use changed as a result of the 1990 Base Closure and Realignment (BRAC) Act, and the name of the facility was changed from NAS Memphis to (NSA) Mid-South.

A significant portion of NSA Mid-South's Northside was transferred to the City of Millington, and the remaining property was realigned (i.e., an operation was reassigned from NSA Mid-South to another facility, and/or an operation from another facility was reassigned to NSA Mid-South). Three facility operations changed: (1) Navy airfield operations ceased in October 1995, (2) training operations were realigned to NAS Pensacola in 1996, and (3) administrative operations for the Navy Bureau of Personnel were realigned from Washington, D.C., to NSA Mid-South in 1997.

As required by the Navy's RCRA Permit, NSA Mid-South is required to evaluate and assess all SWMUs for potential environmental impacts. Due to the former operations at the site, SWMU 63 was designated as a site warranting further evaluation to determine whether hazardous constituents were present. Previous investigations at SWMU 63 include the underground tank removal (National Salvage, 1992), *RCRA Facility Assessment* (RFA; ERC/EDGe,1990), the *Confirmatory Sampling Investigation* (CSI; EnSafe, 1998), and *RCRA Facility Investigation* (RFI; EnSafe, 2000). Analytical results from the CSI resulted in a "No Further Action" remedy. The basis for the remedy selection is provided under the "Summary of Contaminant Evaluation" and "Summary of Site Risk" sections of this SB.

Summary of Contaminant Evaluation

When the 65-gallon underground waste tank at SWMU 63 was removed in April 1992, no soil contamination was evident. Analysis of the contents from the tank, prior to its removal, detected elevated solvent concentrations. After removal of the tank, four soil samples were collected from the excavated tank pit. Although analytical results showed that all parameters tested were undetected in the soil samples, the 1990 RFA recommended that a more comprehensive analysis be conducted to confirm whether hazardous substances were present.

During the CSI, one boring was advanced in the area of the former tank, from which a surface soil (0-1 foot) sample and two subsurface soil samples were collected. The subsurface samples were collected from approximately 6-8 feet below ground surface (bgs), and from 14-16 feet bgs, the latter depth interval similar to that estimated for the bottom of the

removed tank. To assess whether the former tank had impacted the groundwater, a groundwater sample was also collected from the upper portion of the fluvial deposits aquifer at the same boring location. The boring location can be found on Figure 2 (Attachment 1). Samples were analyzed for volatile organic compounds (VOCs). No samples were collected during the RFI.

Soil

Methylene chloride (a solvent widely used in consumer products such as paint removers) was detected in the three soil samples at concentrations ranging from 27 to 34 parts per billion. These detections were below the U.S. Environmental Protection Agency's (USEPA) risk-based screening criteria.

Groundwater

No VOCs were detected in the groundwater sample collected from the boring at SWMU 63.

Summary of Site Risk

As part of the RFI, risks to human health and the environment from the contaminants identified at SWMU 63 were evaluated using human health and ecological risk assessments, which were developed in accordance with existing USEPA and TDEC methods.

Human Health Risk

Analytical data were evaluated and compared to risk-based screening values. No chemicals of concern were identified for SWMU 63 soil or groundwater. However, because SWMU 63 is within the SWMU 39 CSI/RFI area, the RFI recommended that SWMU 63 groundwater be addressed with SWMU 39.

Ecological Risk

SWMU 63 consists of an approximately 7-foot by 7.5-foot area. The site location is within the developed areas of NSA Mid-South and consists of graveled areas surrounded by asphalt streets. The RFI concluded that no complete exposure pathway exists due to lack of habitat and receptors. Consequently, without an exposure pathway, there are no ecological risks.

Selected Remedy for SWMU 63

Results of the RFI investigation were forwarded to the USEPA and TDEC on September 15, 2000. Included in the RFI report was a recommendation for No Further Action. Based on this report, regulatory approval of the No Further Action request was received from TDEC (on March 7, 2001) and USEPA (on April 3, 2001).

Since TDEC's goals for human health and ecological risks have been met, no alternative remedies were evaluated. The Navy's proposed remedy of No Further Action is considered protective of human health and the environment. The remedy meets the four general standards of corrective measures, which are:

- Overall protection of human health and the environment
- Attainment of media cleanup standards
- Controlling the sources of release
- Compliance with standards for management.

There are no site-related contaminants that would pose an excessive risk to an unrestricted reuse of the property or warrant implementation of institutional controls.

References

National Salvage and Service Corporation. (1992, July). *Underground Storage Tank Closure Report, Tank No. S-75W.* Bloomington, Indiana.

ERC/EDGe. (1990, September). *RCRA Facility Assessment, NAS Memphis*. Nashville, Tennessee.

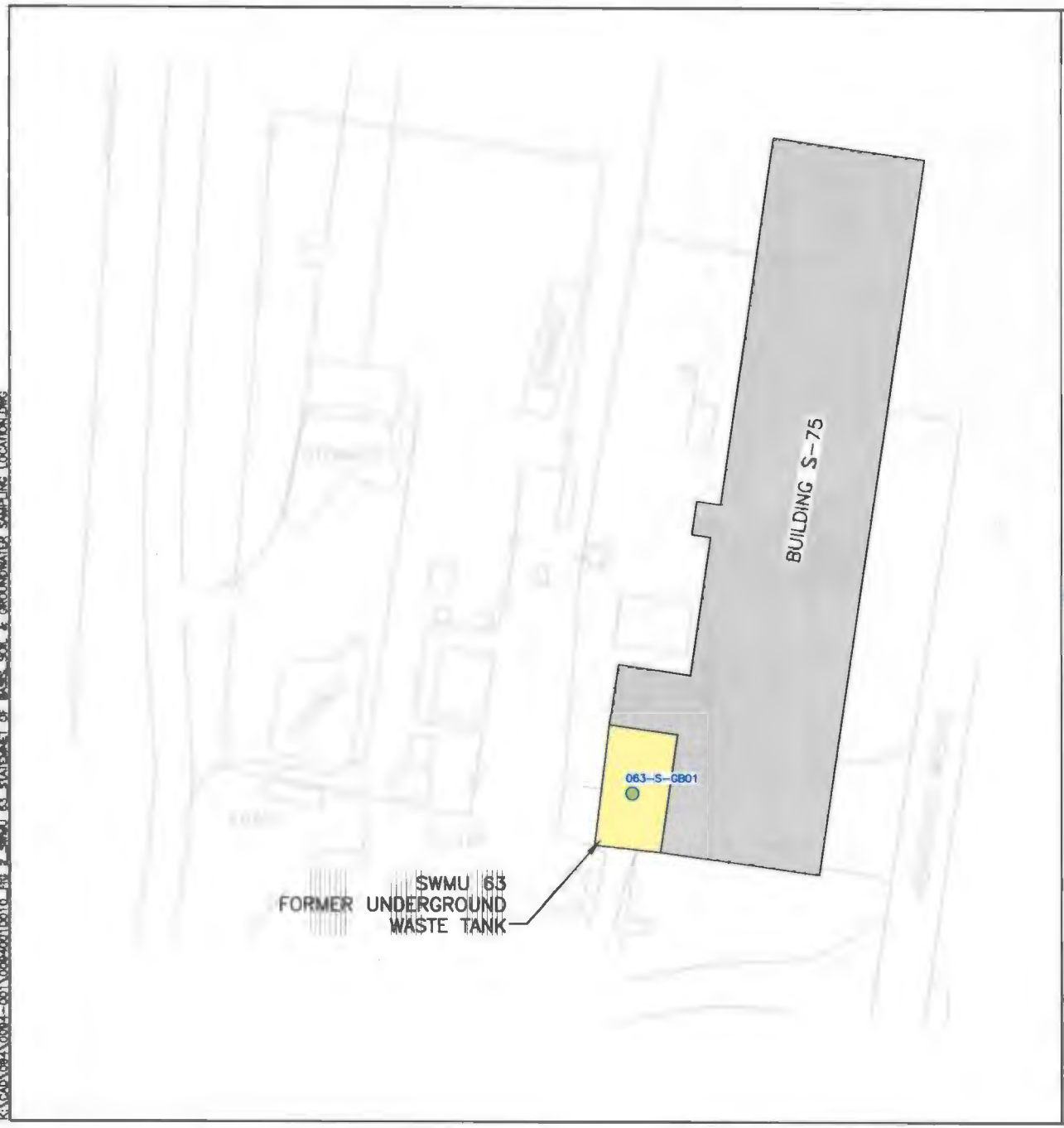
EnSafe/Allen & Hoshall. (1996, July 8). *Assembly F Site Investigation Plan, RCRA Facility Investigation, Naval Support Activity Memphis, Millington, Tennessee — Confirmatory Sampling Investigation*, SWMUs 20, 22 and 63, 30, and 39. Revision 1. Memphis, Tennessee.

EnSafe Inc. (1998, July 31). *Confirmatory Sampling Investigation Report, Assembly F, SWMUs 20, 22/63, 30, and 39, Naval Support Activity Memphis, Millington, Tennessee*. Revision 2. Memphis, Tennessee.

EnSafe Inc. (2000, September 15). *RCRA Facility Investigation Report Assembly F — SWMUs 17, 19, 20, 22, 39, and 63, Naval Support Activity Mid-South, Millington, Tennessee*. Revision 1. Memphis, Tennessee.

Attachment 1

Figure



LEGEND

- SAMPLE LOCATION FOR SOIL AND GROUNDWATER
- 063-S-GB01 – BORING NUMBER
- NSA MID-SOUTH BOUNDARY
- AREA OF INVESTIGATION
- BUILDING
- EXCAVATION AREA

- NSA MID-SOUTH BOUNDARY
- AREA OF INVESTIGATION

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FEET

FIGURE 2
SWMU 63 STATEMENT OF BASIS
SOIL & GROUNDWATER SAMPLING LOCATION

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