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DEPARTMENT OF THE NAVY  
NAVAL AIR STATION MEMPHIS  
MILLINGTON, TENNESSEE 38054 5000

5090  
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14 JUN 1992



Mr. Ronnie Bowers  
Tennessee Department of Environment and Conservation  
Division of Solid Waste Management  
Hazardous Waste Management Section  
Customs House, Fourth Floor  
701 Broadway  
Nashville, Tennessee 37219-5403

Subj: EPA ID #TN2170022600

Dear Mr. Bowers:

It is our understanding, based on a telephone conversation between you and Mr. Mark Taylor of Southern Division, Naval Facilities Engineering Command on June 4, 1992, that the following conditions are acceptable regarding the removal of Underground Storage Tanks (USTs) S-75, 1594, and 75N at Naval Air Station Memphis.

Our contractor will excavate the three tanks at S-75 (1244, 1245, and 1246) and backfill the excavated soil. Analysis of tank contents indicate petroleum hydrocarbons only. S-75 is also designated as a Solid Waste Management Unit (SWMU #22). Therefore, any further site investigation will be accomplished under the RCRA Corrective Action Program, specifically, upon RCRA Facility Investigation (RFI) workplan approval.

The contents of tank 1594 (300 gal) reveal solvent contamination (75 ppm of 1,1,1 trichloroethane). All previous documentation has indicated this tank to contain petroleum hydrocarbons only. The tank contents have been pumped into four 55 gallon drums that will be disposed of in accordance with hazardous waste regulations. The tank is currently declared empty, excavated, and is in the process of undergoing proper decontamination for disposal. In addition, during excavation, no tank leakage was observed. This tank is SWMU #20, therefore, subsequent site investigation will correspond to S-75 above.

When excavated, tank 75N (65 gal) was virtually empty with only enough residue to retrieve one sample. Analytical results showed the residue to be highly contaminated with solvent (22,000 ppm to contain petroleum hydrocarbons only). The tank exhibited no evidence of any leakage during excavation. It will be overpacked and disposed of in accordance with hazardous waste regulations. This site will become an additional SWMU and grouped appropriately in our Corrective Action Management Plan.



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Thank you for your cooperation in clarifying these issues. If you need any additional information, please contact Mr. Mark Taylor of Southern Division, Naval Facilities Engineering Command at (803) 743-0573 or Ms. Tonya Barker of Naval Air Station Memphis at (901) 873-5461.

Sincerely,

D. H. LITTON  
ACTING PUBLIC WORKS OFFICER  
BY DIRECTION OF THE COMMANDING OFFICER  
NAVAL AIR STATION MEMPHIS

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