

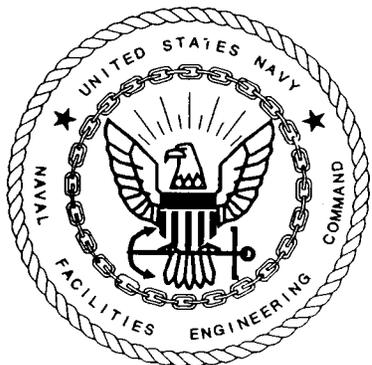
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INVESTIGATION DERIVED WASTE MANAGEMENT PLAN MILLINGTON SUPPACT TN
10/25/1995
ENSAFE, INC.

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INVESTIGATION DERIVED WASTE (IDW) MANAGEMENT PLAN

RCRA FACILITY INVESTIGATION
NAVAL SUPPORT ACTIVITY MEMPHIS

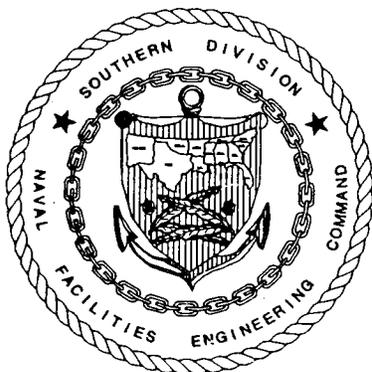


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Prepared for:

Department of the Navy
Southern Division
Naval Facilities Engineering Command
North Charleston, South Carolina



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October 25, 1995

L:IDW.PLN

Table of Contents

1.0	INTRODUCTION	1
1.1	Background	1
1.2	Project Assumptions	1
1.3	Project Responsibilities	2
1.4	Definitions	3
2.0	APPLICABLE REGULATIONS	4
2.1	Federal	4
2.2	State	4
2.3	Local/County	5
3.0	GENERATION	5
3.1	Scheduled Activities	5
3.2	Types of Wastes	5
3.3	Types of Containers	7
4.0	IDENTIFICATION	8
5.0	MANAGEMENT	9
5.1	Handling	9
5.2	Storage	9
5.3	Inventory/Tracking	13
6.0	CHARACTERIZATION	14
7.0	OPERATIONS & MAINTENANCE	14
8.0	REFERENCES	15

List of Figures

Figure 1	IDW Label	10
Figure 2	Facility 1665 Location Map	11
Figure 3	Facility 1665 Storage Area Map	12

List of Tables

Table 1-1	IDW Management Roles and Responsibilities	2
Table 3-1	Solid Waste Management Units/Waste Generation	7
Table 3-2	Approved Container List	8
Table 4-1	IDW Container Label Information	8

List of Appendices

Appendix A	Assembly A IDW Characterization Memorandum
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1.0 INTRODUCTION

1.1 Background

This Investigation Derived Waste (IDW) Management Plan is intended to provide the management structure and procedures for any wastes generated during the scheduled RCRA Facility Investigation (RFI) being conducted at NSA Memphis, Millington, Tennessee. Currently, EnSafe/Allen & Hoshall is conducting an RFI under the U.S. Navy's Comprehensive Long-term Environmental Action Navy (C.L.E.A.N.) contract. It is anticipated that 23 Solid Waste management units (SWMUs), as well as any additional investigations (e.g., Follow-up Gray Area Investigation), will be included in the remaining phases of the investigation. All scheduled activities will be conducted in accordance with the approved work plans listed below.

- Comprehensive RCRA Facility Investigation Work Plan (E/A&H, 1994)
- Assembly D Site Investigation Plans (E/A&H, 1995)
- Assembly E Site Investigation Plans (E/A&H, 1995)
- Follow-up Gray Area Work Plan (E/A&H, 1995)

1.2 Project Assumptions

In order to effectively plan the management strategy for the generation, handling, storage, and disposal of IDW generated during the RFI at NSA Memphis, certain basic assumptions must be made. Decisions of a management and regulatory nature will be made based on these assumptions:

- NSA Memphis is regarded as both the "generator" and the "owner" of any IDW during the RFI and subsequent investigations at NSA Memphis.
- The term "site" is to include the entire area within the NSA Memphis boundaries and is not limited to a Solid Waste Management Unit (SWMU) or Area of Concern (AOC).

- The RCRA Facility Investigation being conducted at NSA Memphis is currently, and shall remain, under the regulatory terms of the Resource Conservation and Recovery Act (RCRA).

- Based on the characterization procedures used during the Assembly A investigation, all IDW generated during the RFI is considered non-hazardous until receipt of analytical data which correlates to that material. The basis for the characterization of IDW generated during the Assembly A investigation is outlined in Appendix A.

1.3 Project Responsibilities

During the RFI, certain types of wastes associated with the investigation are anticipated to be generated. The management of these wastes will be divided among the involved parties which include: Naval Facilities Engineering Command, Southern Division (SOUTHDIV); NSA Public Works Office, Environmental Division (PWO); and EnSafe/Allen & Hoshall (E/A&H). The Navy will retain sole ownership of the IDW, while E/A&H will be responsible for the pre-disposal management of the IDW. The following table outlines the specific responsibilities and roles of each of these parties.

**Table 1-1
IDW Management Roles and Responsibilities**

Personnel	Organization	Role/Title	Responsibility
Mark Taylor	SOUTHNAVFACENGCOM	EIC	SOUTHDIV Engineer-in-Charge
Rob Williamson	NSA Memphis, Public Works Office, Environmental Division	Site Contact	Site access, arrangement for disposal, coordination between U.S. Navy and E/A&H.
Lawson Anderson	EnSafe/Allen & Hoshall	Task Order Manager	E/A&H Project Manager
Robert Smith	EnSafe/Allen & Hoshall	Site Manager	Coordination of all pre-disposal IDW management activities, Coordination between E/A&H and U.S. Navy

1.4 Definitions

In order to determine the management alternatives for IDW, it must be clarified what defines investigation derived wastes, solid wastes, hazardous wastes, and non-hazardous wastes. The definitions presented here are general in the amount of information given. A detailed definition of each term can be found in the referenced documents, if any.

Investigation Derived Waste Any wastes (soil, groundwater, debris, personal protective equipment, etc.) generated during the investigation of any potentially contaminated site.

Solid Waste Any discarded material that is not excluded by 40 CFR 261.4 (a) or that is not excluded by variance granted under 40 CFR 260.30 and 260.31. That is to include solid, semi-solid, liquid and contained gaseous material, including material from industrial, commercial, mining, or agricultural operations.

Hazardous Waste A solid waste, as defined above, is hazardous if it meets any of the criteria of a characteristic waste (reactivity, corrosivity, toxicity, flammability); listed waste (included as a F, K, P or U-listed waste); or any other criteria described in 40 CFR 261.3.

Non-hazardous Waste Any waste not meeting the criteria for hazardous waste as described above or that meet the exemptions stated in 40 CFR 261. One of the critical exemptions is outlined in 40 CFR 261.3(a)(2)(iii) which states that "A solid waste, as defined in 261.2, is a hazardous waste if...it is a mixture

of a solid waste and a hazardous waste that is listed in subpart D of this part solely because it exhibits one or more of the characteristics of hazardous waste identified in subpart C of this part, *unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in subpart C of this part, or...."*

2.0 APPLICABLE REGULATIONS

The regulations governing the management and the ultimate disposition of IDW must be defined in order to determine which are applicable to a given site.

2.1 Federal

The storage, handling and disposal of all IDW during the RFI at NSA Memphis is regulated under the Resource Conservation and Recovery Act as outlined in Chapter 40 of the Code of Federal Regulations, Part 261 (40 CFR 261). All waste handling activities are subject to RCRA inspection and enforcement by the USEPA Region IV, Division of Solid Waste, Federal Facilities Branch.

2.2 State

The Tennessee Department of Environment and Conservation does not presently have regulations governing the generation, handling, storage, transportation, and disposal of IDW. However, TDEC does possess both RCRA inspection and enforcement authority. The primary contact on these matters during this investigation will be the TDEC, Memphis Environmental Field Office, Division of Superfund.

2.3 Local/County

The Memphis/Shelby County Health Department, like TDEC, does not currently have regulations in effect governing investigation derived waste issues. The inspection and enforcement responsibilities are handled by TDEC and/or the USEPA, Region IV.

3.0 GENERATION

3.1 Scheduled Activities

Currently scheduled field activities at NSA Memphis include the Assemblies D and E field investigations, the Follow Up Gray Area Investigation, and the additional sampling at Assembly A SWMUs 5, 40, and 60. However, this document is not limited to these activities. Should additional investigations or remediation be required in the future, the procedures described in this document will be followed.

Activities that may generate IDW during operations at installation restoration (IR) sites include preliminary site investigations, removal actions, confirmatory sampling investigations (CSI), and remedial investigations.

The types of activities scheduled to be conducted during the investigations include, but are not limited to: surface soil sampling, sediment sampling, subsurface soil sampling, and the installation and sampling of monitoring wells. The later two activities are known to produce considerable amounts of IDW in the way of soil cuttings, drilling muds, development water, purge water, decontamination fluids, disposable equipment (DE) and personal protective equipment (PPE).

3.2 Types of Wastes

Field activities performed during the site investigations that may generate IDW typically include some or all of the following:

Activity	Waste Type
Monitoring Well Installation	Soil, decontamination fluids, drilling mud, DE, PPE,
Monitoring Well Development	Development water, silt, decontamination fluids, DE, PPE
Groundwater Sampling	Development water, purge water, decontamination fluids, DE, PPE
Soil Boring	Soil, drilling mud, decontamination fluids, DE, PPE
Soil Excavation/Trenching	Soil, decontamination fluids, DE, PPE
Soil Sampling	Soil, decontamination fluids, DE, PPE
Sediment Sampling	Sediment, decontamination fluids, DE, PPE
Surface Water Sampling	Decontamination fluids, DE, PPE
Aquifer Testing	Development water, groundwater, decontamination fluids, DE, PPE

Table 3-1 presents the Solid Waste Management Units which are scheduled for investigation as well as the anticipated IDW media and the known or suspected contaminants.

Although this IDW Management Plan will be effective for any investigation performed at NSA Memphis, it is unknown at this time what the specific contaminants of concern will be for further investigations.

**Table 3-1
Solid Waste Management Units/Waste Generation**

SWMU No.	Description	Media	Known or Suspected Contaminants
2	Southside Landfill	Soil, Groundwater, Decontamination Water	VOCs, SVOCs, Pesticides, PCBs, Metals
5	Aircraft Fire Fighting Training Facility	Soil, Groundwater, Decontamination Water	VOCs, SVOCs, Pesticides, PCBs, Metals
9	Sewage Lagoons	Soil, Groundwater, Decontamination Water	VOCs, SVOCs, Pesticides, PCBs, Metals
14	Building S-140 Site and 7th Avenue Ditch	Soil, Groundwater, Decontamination Water	VOC, SVOCs, Pesticides, PCBs, Metals
40	Salvage Yard No. 1	Soil, Decontamination Water	VOCs, SVOCs, Pesticides, Metals
59	Pesticide Storage Facility (Old Pesticide Shop)	Soil, Groundwater, Decontamination Water	VOC, SVOCs, Pesticides, PCBs, Metals
60	Northside Landfill	Soil, Groundwater, Decontamination Water	VOCs, SVOCs, Pesticides, Metals
65	Building S-362 (Training Mockup Site)	Soil, Groundwater, Decontamination Water	VOC, SVOCs, Pesticides, PCBs, Metals

3.3 Types of Containers

All investigation derived waste will be placed in reconditioned, Department of Transportation (DOT) and UN-approved 55-gallon drums. Containers must be in good condition and suitable for transportation. These drums are designed to contain specific types of media and will be used in their intended manner. Table 3-2 presents the types of waste and the corresponding proper containers.

**Table 3-2
Approved Container List**

Type of Waste	Type of Drum
Soil	1A2/12/Y100 (Open-top Drum) w/liner
Drilling Mud	1A2/12/Y100 (Open-top Drum) w/liner
Water	1A1/12/Y100 (Closed-top Drum)
Personal Protective Equipment, Disposal Equipment, Plastic Sheeting, etc.	1A2/12/Y100 (Open-top Drum) w/liner

4.0 IDENTIFICATION

This section will outline the procedures used to ensure that all wastes generated are properly marked using a standard system that will allow the wastes to be efficiently and effectively managed.

4.1 Container Labeling

All containerized material (e.g. soil, water, PPE, etc.) will be placed in the proper container as described in Section 3.3. Upon placement into these containers, each container will be labeled with the information presented in Table 4-1:

**Table 4-1
IDW Container Label Information**

General Information	
Contents	A brief description of the media contained (e.g., soil, drilling mud, water, PPE, etc.).
Generator Information	
Name	Name of Generator: Naval Support Activity Memphis
Project No.	E/A&H's internal project code: CTO-094/106
Contact	Site Contact: NSA Memphis Public Works Office, Environmental Division
Address	Site Contact Address: NSA Memphis, Building S-241, Millington, TN
Site ID	SWMU number or Site Description
Boring/Well ID	E/A&H's boring/well/sample identification number
Date	Accumulation Date (date that container was filled)

All information described above will be placed on an "Investigation Derived Waste" label as shown in Figure 1.

5.0 MANAGEMENT

5.1 Handling

As IDW is generated, it will be stored onsite until the investigation of the site/SWMU is completed (or until the end of the 10-day shift). Upon completion of the investigation, all IDW will be moved by E/A&H, or its subcontractor, to the designated storage area. Once the drums are placed in this area, E/A&H will maintain the area during the characterization process. When the waste has been characterized, the responsibility for the IDW is relinquished to the Navy for transport/disposal.

5.2 Storage

All IDW generated will be stored onsite until the current phase of the investigation is completed. The drums will then be placed on pallets and moved to the former AIMD Van Storage area (Facility N-1665) or an appropriate area designated by the NSA Memphis PWO. Drums will be moved to the storage location at the end of each investigatory phase (e.g., DPT, GeoProbe, well installation) or at the end of each 10-day shift. The location of Facility 1665 is shown in Figure 2. Drums will be placed in rows, configured to allow room for inspections, operations & maintenance (O&M), and handling as shown in Figure 3. In the event that the Facility 1665 area is not available, a similar storage arrangement will be implemented at the storage facility selected by the NSA Memphis PWO.

Materials stored in the designated storage area will be characterized within 90 days of the accumulation date. Any containers determined to contain hazardous waste will be immediately moved to the NSA Memphis Hazardous Waste Storage Facility (Facility N-1694).

INVESTIGATION DERIVED WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

CONTENTS: _____

GENERATOR INFORMATION

NAME: _____

PROJECT #: _____

CONTACT: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

SITE ID: _____

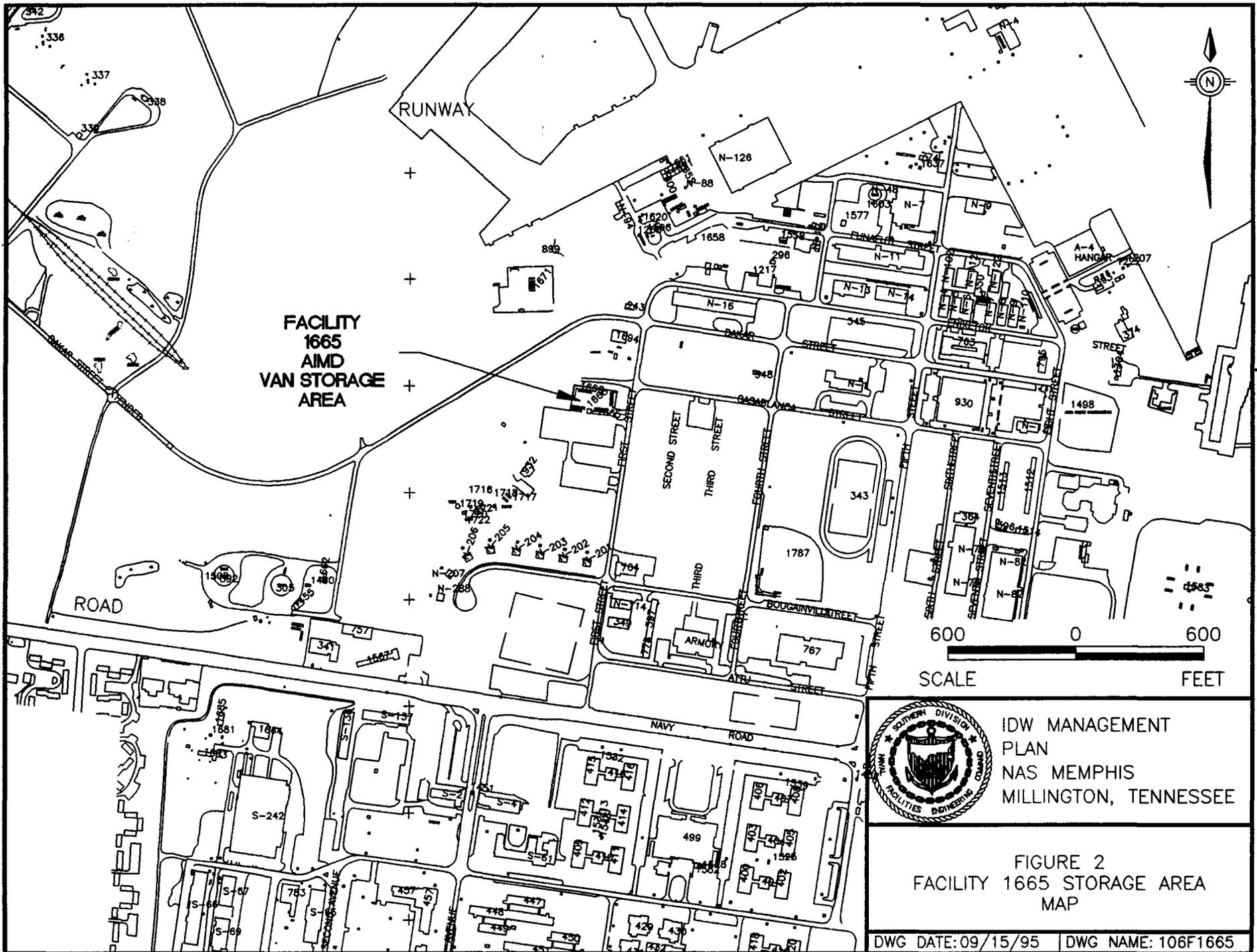
BORING/WELL ID: _____ DATE: _____

HANDLE WITH CARE



IDW MANAGEMENT
PLAN
NAS MEMPHIS
MILLINGTON, TENNESSEE

FIGURE 1
IDW LABEL

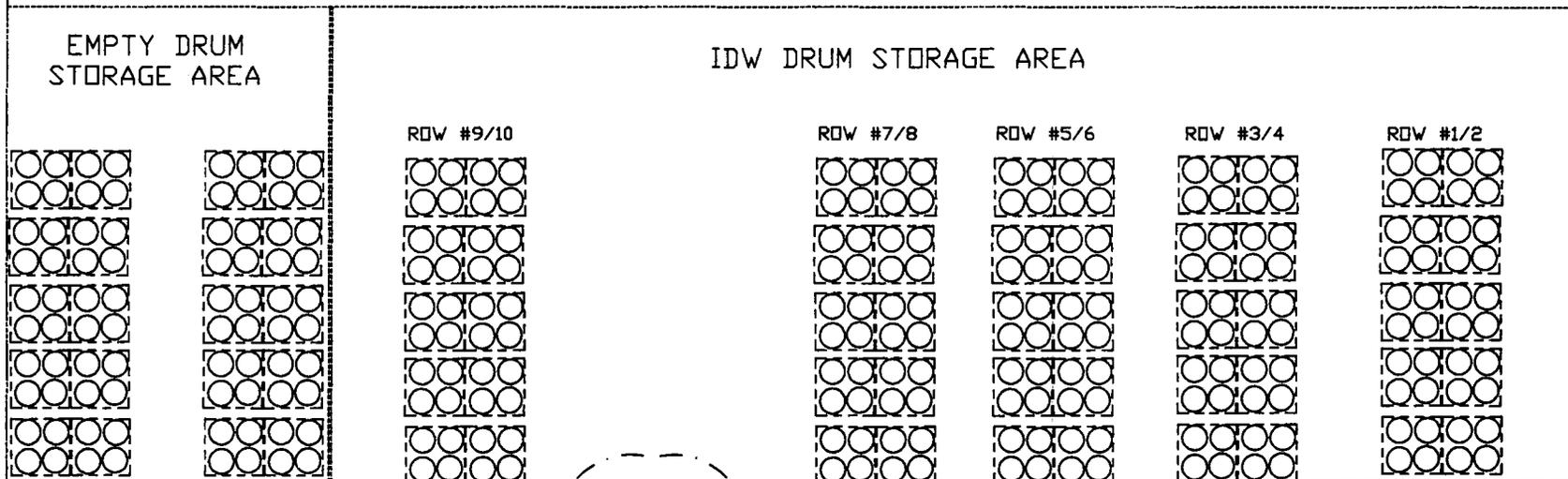


IDW MANAGEMENT
 PLAN
 NAS MEMPHIS
 MILLINGTON, TENNESSEE

FIGURE 2
 FACILITY 1665 STORAGE AREA
 MAP



FACILITY 1665
AIMD VAN STORAGE AREA



IDW MANAGEMENT
PLAN
NAS MEMPHIS
MILLINGTON, TENNESSEE

FIGURE 3
FACILITY 1665 STORAGE AREA
MAP

SCALE: NOT TO SCALE

DWG DATE: 09/15/95 | DWG NAME: 106IDWP

5.3 Inventory/Tracking

An inventory system has been established to allow the project personnel to accurately track the amount, type, and source of IDW generated during the investigation. Each container will be assigned a unique 5-digit tracking number which will identify the site/SWMU from which it originated (e.g., 02025 - SWMU 2, Container 025). This tracking number will be used to link a specific container to its originating boring, interval, and sample identification, if any. This number, along with the other pertinent information, will be recorded and kept on file. All container information will be recorded on an IDW Tracking Form as shown below. The information from this form will be entered into a database for use by project personnel and will allow the correlation between container contents and analytical (sample) data, which will aid in determining storage and disposal requirements.

Investigation Derived Waste Tracking Form					
Container No.	SWMU No./Site Name/Boring No.	Generation Date	Media	Storage Location	Additional Comments

6.0 CHARACTERIZATION

The characterization process is outlined in USEPA's *Management of Investigation-Derived Wastes During Site Inspections* (9345.3-02, May 1991) and *Guidance to Management of Investigation-Derived Wastes* (9345.3-03FS, April 1992). Classification of IDW will also follow the regulations as published in *40 CFR Part 261*. and the regulatory interpretations used to classify IDW from the Assembly A investigation (see Appendix A).

Each container will be referenced to a particular set of analytical (sample) data based on site number, boring number, interval, and/or sample identification. All classification/characterization activities will be conducted when analytical data is received. Prior to receipt of data, all IDW

will be characterized based on site knowledge, field observations, and field analytical data (e.g. organic vapor detector).

7.0 OPERATIONS & MAINTENANCE

During the interim storage period, while waiting for analytical data, the storage area will be routinely inspected to ensure that all containers remain in serviceable condition and to ensure good housekeeping practices. During field activities, the designated storage area will be inspected on a weekly basis, at a minimum, by E/A&H personnel. When field activities are complete, the frequency of inspection will be reduced to once a month, at a minimum. Any maintenance activities required will be conducted by E/A&H personnel. Once the characterization process is complete, all inspections and maintenance activities will be performed by NSA Memphis PWO personnel.

Storage area inspections will be used to identify typical problems associated with drum storage areas. These problems include: bulging drums, leaking drums, improper/missing labels, collapsed pallets, etc. Any reported problems will be addressed as soon as possible.

8.0 REFERENCES

Management of Investigation-Derived Wastes During Site Inspections (May, 1991)
U.S. Environmental Protection Agency, OSWER 9345.3-02

Guidance to Management of Investigation-Derived Wastes (April, 1992). U.S. Environmental Protection Agency, OSWER 9345.3-03FS.

40 CFR Part 261.

EnSafe/Allen & Hoshall and Southern Division. (1994). *Comprehensive RCRA Facility Investigation Work Plan* E/A&H. Memphis, TN.

EnSafe/Allen & Hoshall and Southern Division. (1995). *Assembly D Site Investigation Plan* E/A&H. Memphis, TN.

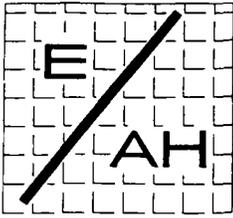
EnSafe/Allen & Hoshall and Southern Division. (1995). *Assembly E Site Investigation Plan*
E/A&H. Memphis, TN.

EnSafe/Allen & Hoshall and Southern Division. (1995). *Follow-up Gray Area Work Plan*
E/A&H. Memphis, TN.

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APPENDIX A

ASSEMBLY A IDW CHARACTERIZATION MEMORANDUM



EnSafe / Allen & Hoshall

a joint venture for professional services

5720 Summer Trees Dr. Suite 8 Memphis, TN 38134
(901) 383-9115 Fax (901) 383-1743

MEMORANDUM

TO: Rob Williamson
NAS Memphis, Public Works Environmental Division

Mark Taylor
SOUTHNAVFACENGCOM

FROM: Lawson Anderson, E/A&H *LA*

SUBJECT: Characterization of Investigation-Derived Waste from Assembly A SWMUs; NAS Memphis RFI; Millington, Tennessee; CTO-094

DATE: June 6, 1995

After further review of the RCRA regulations and USEPA guidance documents, E/A&H would like to revise and expand upon the discussion of investigation-derived waste (IDW) characterization contained in our May 26, 1995 memo. As mentioned in the memo, the presence of the F-listed hazardous wastes acetone (F003), methylene chloride (F002), and methyl ethyl ketone (F005) in soil boring data from Assembly A SWMUs caused us to tentatively characterize IDW associated with those borings as hazardous waste until sampling and analysis of the IDW itself could be performed. In most cases, this tentative "hazardous" classification will no longer apply based on the definition of hazardous waste provided at 40 CFR 261.3(a)(2)(iii) and in the USEPA Superfund Land Disposal Restriction Guide #5 (July 1989) discussion of the "contained-in" policy.

40 CFR 261.3(a)(2)(iii) states that "A solid waste, as defined in 261.2, is a hazardous waste if...It is a mixture of a solid waste and a hazardous waste that is listed in subpart D of this part solely because it exhibits one or more of the characteristics of hazardous waste identified in subpart C of this part, **unless the resultant mixture no longer exhibits any characteristic of hazardous waste identified in subpart C of this part, or....**" According to 40 CFR 261.30, the F003 wastes (including acetone) were listed because of their ignitability. Because of the low concentrations detected and the media (i.e., soil) in which it is contained, soil found at the Assembly A SWMUs does not exhibit the ignitable characteristic and therefore the soil/acetone mixture would not be a hazardous waste. The F002 wastes (including methylene chloride) were listed because of their toxicity, while the F005 wastes (including methyl ethyl ketone) were listed because of ignitability and toxicity. Because toxicity cannot be physically defined as ignitability can, it would be difficult to prove that a soil/F002 or soil/F005 mixture is no longer toxic. Therefore, the exclusion outlined above cannot be applied to IDW containing methylene chloride or methyl ethyl ketone; however, the "contained-in" policy, described below, can be applied.

Rob Williamson/Mark Taylor
June 6, 1995
Page 2

The LDR Guide #5 provides the following discussion of the Contained-In Interpretation (USEPA Office of Solid Waste Memorandum dated November 13, 1986). "The contained-in interpretation states that any mixture of a non-solid waste and a RCRA listed hazardous waste must be managed as a hazardous waste as long as the material contains (i.e., is above health-based levels) the listed hazardous waste." The contained-in policy was developed to address contaminated environmental media (groundwater, surface water, soil, etc.), as opposed to the mixture rule which governs mixtures of hazardous and solid waste. E/A&H confirmed today that the Tennessee Department of Environment and Conservation (TDEC), Division of Solid Waste Management concurs with and applies the USEPA contained-in policy. This confirmation was obtained in a telephone conversation with Mr. Chuck Allen (Hazardous Waste Section, Compliance and Enforcement) of the TDEC Central Office.

E/A&H is basing its characterization of the soil and drilling mud IDW generated during the RFI on the contained-in policy. We believe that the contained-in policy may be applicable to the drilling mud at NAS Memphis because, unlike true drilling mud, it consists only of formation soil and water. Soil boring data will be compared to residential risk-based concentrations for soil ingestion listed in the January - June 1995 Risk-Based Concentration Table (USEPA Region III, 3/95) to determine if concentrations of listed hazardous waste contained in the IDW exceed health-based levels. Soil ingestion values for non-carcinogens in the RBC table are based on a cumulative risk factor or hazard quotient of 1 for sites with multiple contaminants. Therefore, when screening individual non-carcinogenic compounds, the values should be divided by 10 to provide a more conservative hazard quotient of 0.1. This results in the following residential soil ingestion values for screening the IDW at NAS Memphis:

Contaminant	Residential Soil RBC
Acetone (non-carcinogen)	780 mg/kg (780,000 ug/kg)
Methyl Ethyl Ketone (non-carcinogen)	4,700 mg/kg (4,700,000 ug/kg)
Methylene Chloride (carcinogen)	85 mg/kg (85,000 ug/kg)

Based on the discussion outlined above, E/A&H offers the following SWMU-specific suggestions and opinions concerning characterization of the Assembly A IDW. Please note that E/A&H is conducting the investigation as a contractor to the Navy; therefore, the Navy is the generator and owner of the IDW and is ultimately responsible for the final treatment, storage, characterization, and disposal of the IDW generated during the RFI. E/A&H recommends that TDEC Solid Waste Management Division concurrence with using residential risk-based concentrations as health-based levels be obtained. We attempted to contact Mr. Bill Krispin (Hazardous Waste Section, Land TSDf) of the TDEC Central Office to seek concurrence, but were unable to reach him.

IDW CHARACTERIZATION

SWMU 3 - N-121 Plating Shop Dry Well Acetone (240 ug/kg) and methyl ethyl ketone (41 ug/kg) were detected in one soil sample from Boring 4. These values are well below health-based levels. Therefore, E/A&H considers the soil/mud IDW from SWMU 3 non-hazardous.

SWMU 5 - Aircraft Firefighting Training Facility Acetone (10 - 110 ug/kg), methylene chloride (2 ug/kg), and methyl ethyl ketone (20 ug/kg) were detected in soil samples from Boring 4. These values are well below health-based levels. Therefore, E/A&H considers the soil/mud IDW from SWMU 5 non-hazardous.

SWMU 7 - N-126 Plating Shop Dry Well Groundwater contamination by listed chlorinated solvents (primarily trichloroethylene) is pervasive at SWMU 7. The majority of the groundwater contamination was detected in monitoring wells screened in the fluvial deposits between 40 and 100 feet below ground surface. Listed chlorinated solvents were not detected in shallow soil samples collected from the loess and were detected in shallow groundwater (approximately 15 to 25 bls) at Well Cluster 1 only. Although groundwater contamination is widespread (especially deeper), chlorinated solvents were not detected in shallow soil samples collected in the unsaturated zone of the loess. Acetone (6 - 1,100 ug/kg) was detected in soil samples from six borings and methyl ethyl ketone (5 - 69 ug/kg) was detected in soil samples from two borings. These values are well below health-based levels.

The majority of the IDW drums from SWMU 7 contain drilling mud generated during installation of surface casings in the loess. Based on test results (described above) for the shallow soil where the casings were installed, E/A&H considers the drilling mud (which is actually formation soil) contained in these drums non-hazardous.

Soil cores removed from borings for the deeper wells were likely to be in contact with groundwater contaminated with the listed chlorinated solvents trichloroethylene, perchloroethylene, and carbon tetrachloride. Based on comparison (see below) of the maximum concentrations detected in groundwater to residential soil RBCs, as well as the observation that a DNAPL plume was not found and soil cores were not obviously contaminated, E/A&H concludes that listed wastes contained in soil IDW from SWMU 7 should be well below health-based levels. Therefore, E/A&H also considers the soil contained in drums from SWMU 7 non-hazardous.

Contaminant	Concentration	Soil RBC
Trichloroethylene	73 ug/L	58,000 ug/kg
Tetrachloroethylene	28 ug/L	12,000 ug/kg
Carbon Tetrachloride	12 ug/L	4,900 ug/kg

Rob Williamson/Mark Taylor

June 6, 1995

Page 4

SWMU 8 - Cemetery Disposal Area Acetone (10 - 110 ug/kg) and methylene chloride (2 ug/kg) were detected in three soil borings. These values are well below health-based levels. Therefore, E/A&H considers the soil/mud IDW from SWMU 8 non-hazardous.

SWMU 60 - Northside Landfill Acetone (16 - 23 ug/kg), methylene chloride (3 - 190 ug/kg), and methyl ethyl ketone (4 ug/kg) were detected in soil samples from five soil borings. These values are well below health-based levels. Therefore, E/A&H considers the soil/mud IDW from SWMU 60 non-hazardous.

NON-HAZARDOUS IDW DISPOSAL

Several options for disposal of the non-hazardous IDW are listed below in the order that E/A&H feels they should be considered.

1. Soil/mud can be returned to the sites where it was generated and spread or buried onsite. This option has the best support from existing regulations/guidance.
2. All soil/mud can be taken to an existing SWMU such as the Cemetery Disposal Area (SWMU 8) or the Northside Landfill (SWMU 60) and spread or buried onsite, preferably in one area to answer future inquiries about where it was disposed of. Spreading or stockpiling the soil/mud at an existing SWMU will eliminate the potential creation of a future SWMU.
3. Soil/mud can be used as fill anywhere on the base. If this option is selected, E/A&H strongly recommends that representative samples be collected from the drums and analyzed to document that soil/mud being spread around the base is not contaminated. This option has the greatest potential for creating future problems.

E/A&H recommends that any option selected (regardless of whether it is selected from the list above), be approved by the BRAC Cleanup Team.