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NSA MID SOUTH
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STATEMENT OF BASIS SOLID WASTE MANAGEMENT UNIT 48 FORMER HAZARDOUS WASTE ACCUMULATION POINT AT BUILDING S 9 MILLINGTON SUPPACT TN

Statement of Basis
Solid Waste Management Unit 48
Former Hazardous Waste Accumulation Point at Building S-9
Naval Support Activity Mid-South
Millington, Tennessee

INTRODUCTION

This Statement of Basis contains a summary of the location, operating history, contaminants detected, and remedy selected for Solid Waste Management Unit (SWMU) 48, Former Hazardous Waste Accumulation Point at Building S-9, Naval Support Activity Mid-South, Millington, Tennessee. It should be noted that all analytical data for soils was compared to Region III Risk Based-Screening Criteria (RBCs) except analysis for total petroleum hydrocarbons (TPH) which was compared to the state regulatory standard. Groundwater analytical data was compared to Maximum Contaminant Levels (MCLs). Where there was no groundwater MCL, Region III RBC's were used for comparison. TPH in groundwater was compared to the state regulatory standard.

SPECIFIC SITE INFORMATION

SWMU 48 is located approximately 150 feet north of Ticonderoga Street on NSA Mid-South's Southside (Figure 1), and on the service (west) side of the Building S-9 complex, just outside overhead doors and work bays. Reportedly operated since 1950, SWMU 48 consists of various inactive hazardous waste accumulation points for containerized paint thinners, degreasing agents, and batteries.

SUMMARY OF CONTAMINANT EVALUATION

The primary objective of the Confirmatory Sampling Investigation (CSI) was to determine whether a release had occurred at SWMU 48. During the CSI, a soil investigation was conducted, but no groundwater samples were collected. Soil samples were collected in and around the former hazardous waste accumulation area. Eight soil samples were collected from four locations as shown on Figure 2, one outside each bay on the western side of Building S-9 in the area of the hazardous waste accumulation point. Two samples were collected at each location, one below the asphalt/concrete (to approximately 1 foot deep) and one 3-4 foot deep. The surface soils were used to inspect for surface releases, and subsurface samples were used to better define the vertical extent of contamination. The soil samples were analyzed for indicators of the types of materials once stored at SWMU 48 and included volatile organic compounds, semi-volatile organic compounds, Appendix IX metals, and total petroleum hydrocarbons.

Soils

TPH was detected in all eight-soil samples. Of these, seven samples had detections between 120 parts per million (ppm) and 230 ppm, which are above the most conservative TDEC soil cleanup

value of 100 ppm. Based on these detections, the CSI recommended that the TPH-contaminated soil be removed. No other constituents were detected above relevant action levels.

Based on the CSI recommendation, soil at SWMU 48 was excavated to dimensions of 6 feet wide by 6 feet long, to a depth of 5 feet below ground surface, to remove petroleum-contaminated soil in all four areas outside the Building S-9 work bays. Approximately 6.5 cubic yards of soil was removed from the excavation. The excavated soils were not visibly stained and had no petroleum odor. Following excavation, one five-part composite sample was collected from each of the SWMU 48 excavation areas (Figure 2); the composite samples included soils from the excavation bottoms and sidewalls. All effectiveness TPH results were less than the most conservative TDEC cleanup standard of 100 ppm.

Groundwater

Because SWMU 48 is within the SWMU 17 RFI area, SWMU 48 groundwater was investigated with SWMU 17. Consequently, no groundwater samples were collected at SWMU 48.

SELECTED REMEDY

Investigations at SWMU 48 indicate no release of contaminants above relevant action levels. Based on the available information, the proposed remedy is no further action (NFA).

REFERENCES

EnSafe Inc. (2000, April 28). *Confirmatory Sampling Investigation Report, Assemblies G and H, Naval Support Activity Mid-South, SWMUs 23, 24, 41, 43, 47, 48, 49, and 61*. Revision 2. Memphis, Tennessee.

EnSafe Inc. (2001, June 29). *Voluntary Corrective Action Report, RCRA Facility Investigation, Naval Support Activity Mid-South, Petroleum-Contaminated Soil Removal Buildings S-362/SWMU 65, S-235, S3-94, N-114/SWMU 24, N-1211, N-105, N-108, S-203, SWMU 41, SWMU 43, SWMU 47, SWMU 48, and SWMU 49.*, 2001. Revision 1. Memphis, Tennessee.

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

FIGURES FOR SWMU 48

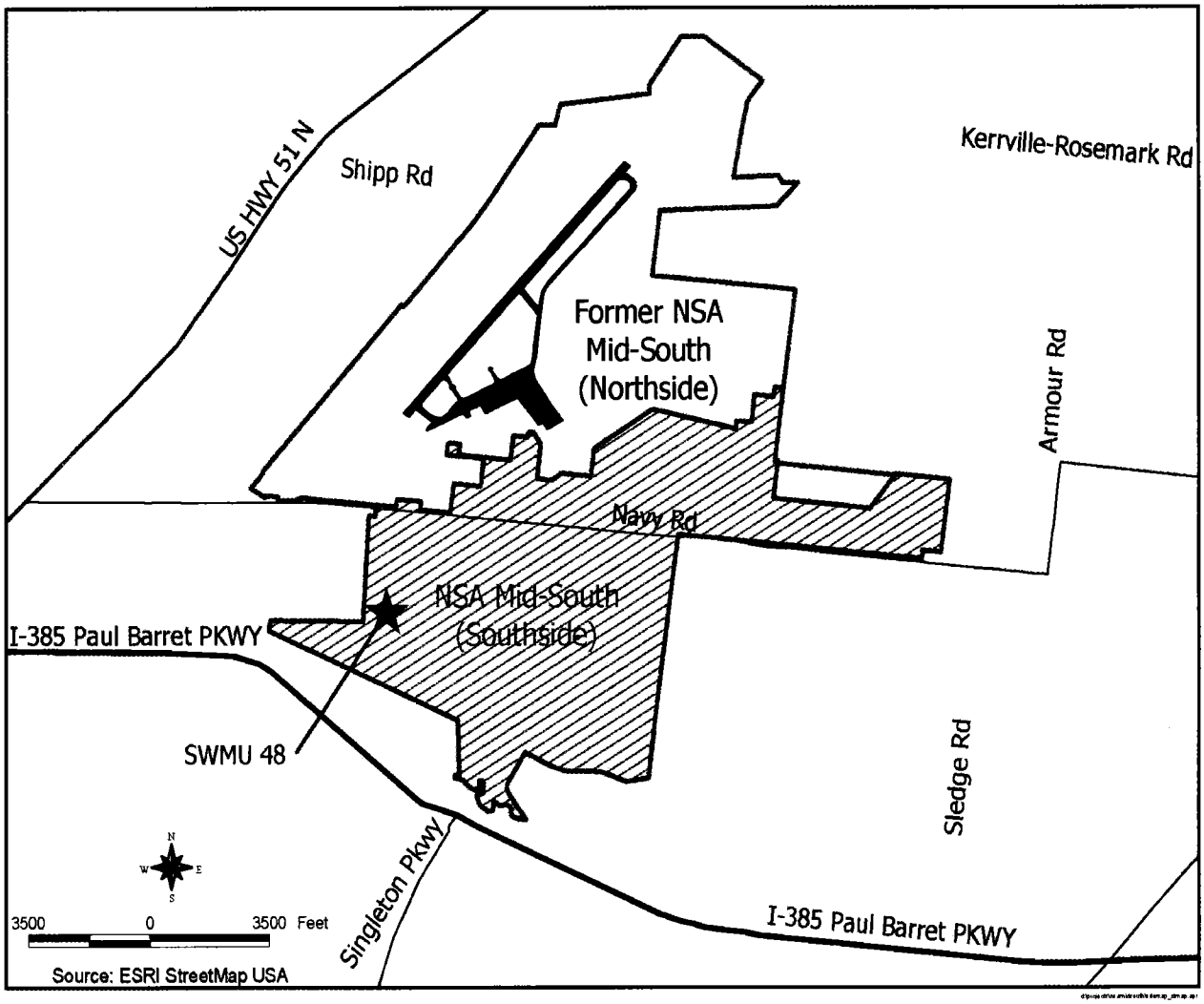

Figure 1: SWMU 48 Location at NSA Mid-South, Millington, Tennessee
Former Hazardous Waste Accumulation Point at Building S-9

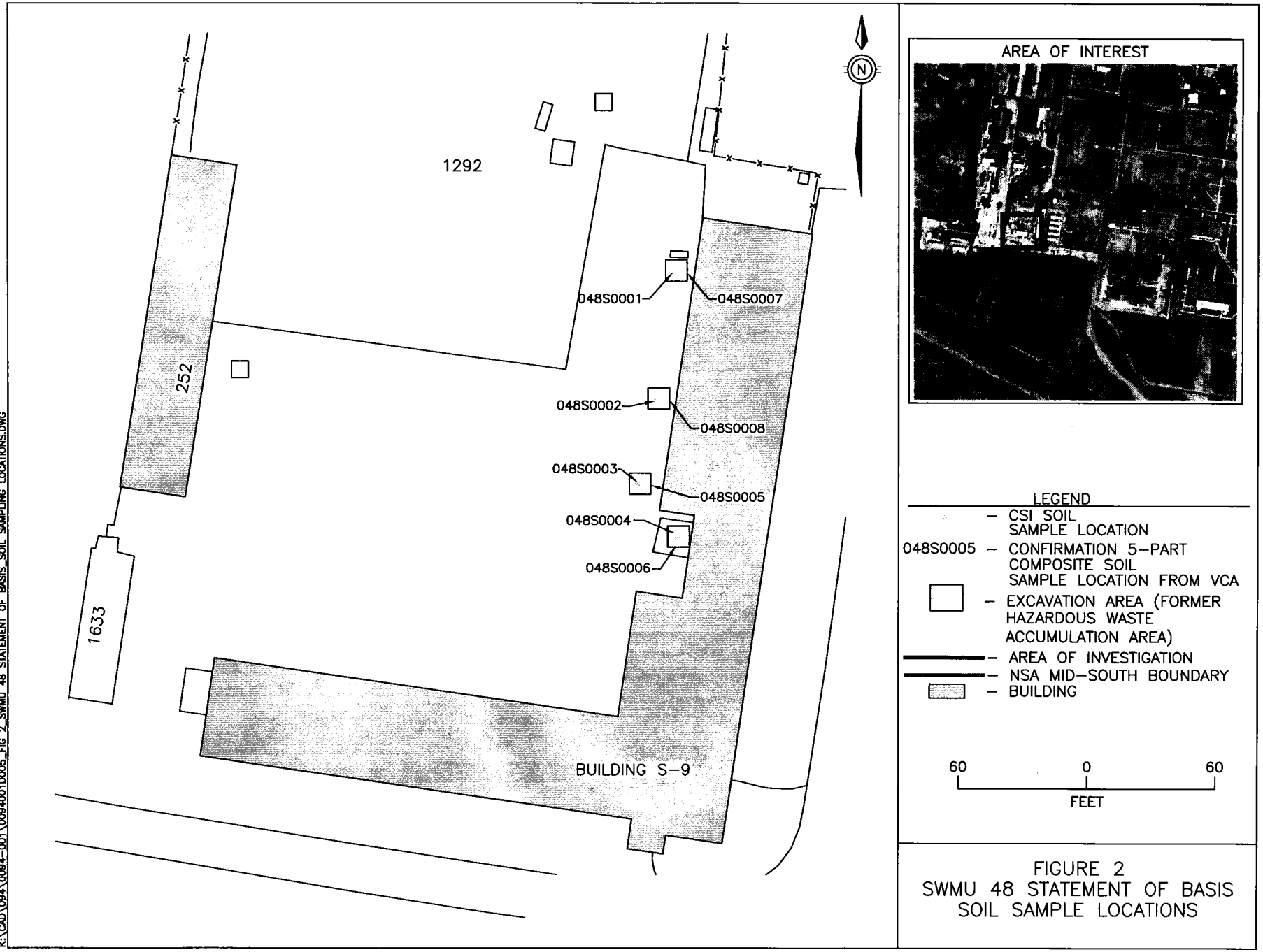

FIGURE 2
SWMU 48 STATEMENT OF BASIS
SOIL SAMPLE LOCATIONS

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K:\CAD\094\0094-001\00940010005_FIG 2_SWMU 48 STATEMENT OF BASIS_SOIL SAMPLING LOCATIONS.DWG