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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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ATLANTA, GEORGIA 30365

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1D-00370

4WD-PPB AUG 0 5 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain Earl ^{Strout} Straut, USN
Naval Air Station Memphis
Millington, Tennessee 38054

RE: Corrective Action Management Plan (CAMP)
NAS Memphis, Tennessee
EPA I.D. Number TN2 170 022 600

Dear Captain Straut:

The Environmental Protection Agency (EPA) and the Tennessee Department of Environment and Conservation (TDEC) have completed a review of the Draft Corrective Action Management Plan (CAMP) received in this office on December 24, 1991. Enclosed are our joint comments.

EPA concurs with the Navy's request to extend the due date for the revised RCRA Facilities Investigation (RFI) Work Plan. However, as indicated by our enclosed comments, EPA is not in agreement with the proposed revised submittal date for this document. So that work outlined in this plan may proceed as expeditiously as possible under an approved schedule, a revised CAMP must be submitted at your earliest convenience and no later than thirty (30) days from your receipt of this letter. Please provide two copies, each, of the revised CAMP to this office and to Ronnie Bowers at TDEC.

In addition, EPA has completed its review of the RCRA Facility Assessment (RFA) prepared for SWMU 62: M-21 Arresting Gear Drainage Area, received February 13, 1992. We have found this document to be adequate for its purposes. Due to the lack of existing data for this site and the absence of conclusive evidence indicating a release, EPA concurs with the Navy's decision to perform a Confirmatory Sampling Investigation (CSI) on this SWMU.

Should you have any questions regarding these matters, please contact Ms. Allison Drew of my staff at 404/347-3016.

Sincerely yours,

Jon D. Johnston

Jon D. Johnston, Chief
Federal Facilities Branch
Waste Management Division

Enclosure

cc: Mark Taylor, SOUTH DIV NAV FAC ENG COM
Jimmie Black, NAS Memphis
Ronnie Bowers, TDEC

TECHNICAL REVIEW AND COMMENTS
DRAFT CORRECTIVE ACTION MANAGEMENT PLAN
NAVAL AIR STATION (NAS) MEMPHIS
MEMPHIS, TENNESSEE

EPA COMMENTS:

1. Pages 1 through 4, Paragraph 4 & Table 1-1:

A. According to the RFA, three of the SWMUs listed in the CAMP as UST SWMUs, including:

SWMU 15: N-94 Underground Tank Farm
SWMU 20: 1594 Underground Waste Tank
SWMU 21:N-10 Underground Waste Tank

were used to store a variety of liquid wastes, including paints, solvents, strippers, hydraulic fluid, waste oil, possible PCBs, etc.). Due to the fact that non-petroleum products were stored in these tanks, the investigation of these SWMUs must meet the requirements of the Corrective Action program, rather than the UST program. Please make the necessary corrections to the text, table, and throughout the remainder of the CAMP.

As stated in EPA's February 22, 1990 letter to NAS Memphis, the following two SWMUs identified in the RCRA Facility Assessment (RFA) are to be investigated under the Navy's UST program:

SWMU 22: S-75 Underground Fuel Tanks
SWMU 23: S-8 Underground Fuel Tank

However, the Navy should keep in mind that releases from these SWMUs may also be subject to RCRA Subtitle C requirements (55 FR 30857).

B. EPA prefers the term "Confirmatory Sampling Investigation" (CSI) to "preliminary RFI" or PRFI. The former term more clearly indicates the purpose of the required sampling: i.e. to determine whether or not a release has occurred. Use of the latter term suggests that some type of full or partial RFI has been required. Please make the necessary corrections here and throughout the CAMP.

2. Page 8, Table 3-1:

The site groupings presented in this table seem rather large, and may prove unmanageable from a scheduling and budgetary perspective. For instance, the timetable in Table 6-1 allots 45 weeks for the investigation of the fourteen RFI sites. This is an extremely long schedule, considering that the RFIs for some individual SWMUs may take no more than a few weeks to complete. By grouping such a large number of sites together, the entire process is considerably lengthened for many sites, resulting in unnecessary delays to site cleanup. Furthermore, preparation of the work plan and final report is likely to be extremely cumbersome and time-consuming. The review process for such lengthy documents will also be very slow. Finally, the scheduling of numerous sites for simultaneous investigation makes the schedules more susceptible to delays due to funding limitations.

EPA recommends that Group II (RFI) sites be divided into at least 3 smaller groups and Group III (Confirmatory Sampling for non-operational sites) be divided into at least 2 smaller groups. This should facilitate both project management and progress towards more effective and efficient site cleanup.

3. Page 13, Table 6-1:

A. This table does not represent an enforceable schedule, although it is still a valuable tool for planning and information purposes. A second table, which contains an enforceable schedule, must be added to the CAMP. The enforceable schedule should consist solely of a list of enforceable due dates for all deliverables (e.g. work plans, reports, etc.). The schedule should include all pertinent due dates, up to and including submittal of the Corrective Measures Study for RFI sites and the Confirmatory Sampling Report for all Confirmatory Sampling sites.

B. While EPA will make every effort to meet the proposed 4-week review periods, the Agency cannot guarantee these turnaround times. Furthermore, enforceable schedules shall not be dependent on the Agency's review periods. Rather, all enforceable due dates for deliverables must be stated in terms of "[date or time from approval of the document]".

C. Phase No. 2, Activity No. 5: please modify the text to read "Prepare revised Draft Final RFI Work Plan"

D. Phase No. 2, Activity No. 7: please modify the text to read "Prepare Final RFI Work Plan"

E. The gap, or time lag, between Phase Nos. 2 and 3 allowing for unfavorable weather conditions should not be built into the schedule. Rather, once the approval date of the work plan is known, a request to delay field work should be submitted if necessary or appropriate.

F. All of the field investigative periods, and particularly the 45 weeks to conduct field work for Group II, appear excessive. The time periods allotted for preparation of the draft RFI Work Plan and the draft "PRFI" Reports for Groups III and IV also appear excessive. These periods must be revised in accordance with comment 1B. Also, all field work periods presented in the final CAMP will be considered conditionally approved and subject to revision following review and finalization of the corresponding work plans.

TDEC COMMENTS:

1. Page 6, paragraph 3:

The fourth objective should be revised to read:

"Conduct Confirmatory Sampling Investigations (CSIs), or Verification Sampling at five SWMUs where USTs will be removed under the Navy's UST Program to confirm whether releases have occurred and, if so, whether RFI characterization is needed.

2. Page 9, paragraph 6:

"Group V was assigned the lowest priority because the Navy is currently soliciting bids from contractors to remove the USTs in this group in accordance with the state of Tennessee's UST regulations." The fact that the Navy is currently soliciting bids to remove these USTs does not necessarily mean that this group is low risk. Better justification for assigning the UST group a "priority V" must be provided.