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**NAS MEMPHIS**  
Millington, Tennessee

**History of the Installation Restoration Program  
Fact Sheet**

May 1994

• **Introduction**

The **Installation Restoration Program (IRP)** at Naval Air Station Memphis is dedicated to the environmental cleanup of property at the base. It has been in progress since 1983 and is accelerating because of the base's changing mission under the **Base Closure and Realignment Act** — also known as **BRAC**.

• **Early Legislation**

Until the 1970s, base-generated wastes were handled similarly to regular garbage. They were disposed of at the local dump or in some similar fashion. When it became increasingly evident that these past waste disposal practices had a negative impact to the environment, Congress passed the **Resource Conservation and Recovery Act (RCRA)** of 1976, which established a national strategy for managing all industrial-related wastes.

In 1980, Congress addressed the sites across the country where hazardous materials, such as chemicals or petroleum products, had been used or disposed of in the past. In December of that year, Congress directed the **Environmental Protection Agency (EPA)** to develop a comprehensive national program to manage inactive or abandoned disposal sites. This program, under the **Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)** of 1980, set up a "Superfund" for cleaning up these past waste sites nationwide where responsible parties cannot be found or are not financially capable of cleanup. CERCLA places the responsibility for these sites with the EPA.

• **History of the IRP**

The Department of Defense (DOD), working with the Army in 1975, established a pilot program for environmental cleanup prior to CERCLA. This program was designed to investigate past disposal sites at all military installations. In 1980, DOD named this program the **Installation Restoration Program (IRP)** and directed that the program be implemented by all of the services. The IRP paralleled and met all of the requirements of CERCLA. The Navy implemented the DOD program and named its program **Navy Assessment and Control of Installation Pollutants (NACIP)**.

- **The RCRA Permit at NAS Memphis**

In 1986, Congress amended CERCLA with the **Superfund Amendments and Reauthorization Act (SARA)**, requiring that the Navy adopt EPA terminology. At that point, investigations and actions in the Navy's IRP began to be referred to under CERCLA terms, rather than those previously used under NACIP.

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RCRA was amended by the **Hazardous and Solid Waste Amendments (HSWA)** of 1984. HSWA, Section 3004(u), requires corrective action at the **Solid Waste Management Units (SWMUs)** identified under every RCRA permit. SWMUs are "any discernable waste management unit from which hazardous constituents may migrate, irrespective of whether that unit was intended for the management of hazardous wastes."

NAS Memphis has been a RCRA-permitted facility since 1986. This means that the base has a permit to store regulated wastes used in or resulting from its daily operations. To receive this permit, NAS Memphis had to prove that it was handling these materials in an environmentally responsible way and identify all SWMUs.

As a condition of this RCRA permit, NAS Memphis is required to determine if there has been any release, such as a spill, or disposal of chemicals or petroleum products on the base. **RCRA Facility Investigation (RFI)** work plans have been prepared to evaluate all SWMUs where such a spill or disposal is known or suspected to have occurred. Therefore, the IRP at NAS Memphis follows RCRA steps to identify and clean up these sites. These steps are outlined on page three of this fact sheet.

- **Questions?**

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If you have questions about the IRP or other environmental restoration issues, call the NAS Memphis Public Affairs Office at (901) 873-5761 or visit one of the three information repositories listed below.

- **Repository Locations**

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Public repositories of information on the environmental restoration of NAS Memphis are being set up at the following locations:

- ◆ The Millington Public Library (4858 Navy Road, 872-1585);
- ◆ Millington City Hall (7930 Nelson, 872-2211); and
- ◆ The NAS Memphis Library (South 78 Building, 873-5683).

*This fact sheet is a reprint of the May, 1994 publication. This reprint includes a correction in the terminology flow chart.*

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# Relationship Between Navy IRP, CERCLA and RCRA Terminology

