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PUBLIC NOTICE REGARDING UPDATE OF ENVIRONMENTAL ACTIVITIES MILLINGTON  
SUPPACT TN  
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NAVAL AIR STATION



# NAVAL AIR STATION MEMPHIS MILLINGTON, TENNESSEE

## UPDATE OF ENVIRONMENTAL ACTIVITIES

### INTRODUCTION

Environmental investigations have been underway at NAS Memphis through the Navy's Installation Restoration Program since 1986. This program was established to address areas of potential contamination from past spills and waste disposal practices. A variety of environmental laws govern the Navy's restoration activities under this program. This update briefly discusses the most influential laws impacting the program and provides an overview of the environmental restoration activities at NAS Memphis during the past year.

### RCRA CORRECTIVE ACTION

The Resource Conservation and Recovery Act (RCRA) is an environmental law that directs the majority of cleanup activities at NAS Memphis. This law established a national strategy for managing solid and hazardous waste operations. Under this law, NAS Memphis holds a permit to operate a storage facility for hazardous waste. NAS Memphis is also regulated under RCRA's corrective action process. This process requires corrective action of past hazardous waste spills or releases from any solid waste management unit. This process is outlined in the adjacent box.

#### RCRA Corrective Action Cleanup Steps

- ① **RCRA Facility Assessment**  
Preliminary assessment. Identifies potential or actual contamination releases by reviewing records and visually examining each solid waste management unit.
- ② **RCRA Facility Investigation**  
Detailed investigation of site. Confirms contamination and determines its nature and extent.
- ③ **Corrective Measures Study**  
Development and evaluation of best cleanup options.
- ④ **Corrective Measures Implementation**  
Site cleanup or remediation.
- ⚡ **Interim Measures**  
Stabilization or control measures to limit immediate risk to health or the environment. These measures can be implemented at any time in the process.

### ENVIRONMENTAL RESTORATION UNDER BRAC

The Defense Base Closure and Realignment Act of 1990, also called BRAC, has brought about major changes in the way environmental investigations and cleanups are conducted on bases around the country. This legislation identified certain Department of Defense bases for realignment or closure, resulting in all or part of base property being turned over to the community. When a base is slated for closure or realignment, the environmental investigations

are accelerated and absorbed into the BRAC process. Property not affected by BRAC will continue to be investigated and restored at the original schedule, while the schedule for BRAC property is pushed forward.

NAS Memphis was designated for realignment and partial closure in the 1993 round of closure assignments. Since then, major efforts have been made to expedite the environmental restoration in a cost-effective and environmentally sound manner so that property can be returned to the community for reuse quickly. Two new activities have been undertaken to meet BRAC requirements:

NAS Memphis was designated for realignment and partial closure in the 1993 round of Defense Base Closure and Realignment assignments.

#### ***Environmental Baseline Survey***

The Environmental Baseline Survey, or EBS, is an extensive survey of NAS property which is used to evaluate the environmental condition of the entire facility. This report details the suitability for transfer of property at the base, and makes recommendations for further investigation, where needed. The baseline survey guides the Navy in making sound property transfer decisions. Department of Defense policy requires that an EBS be conducted before any property can be sold, leased, transferred, or otherwise acquired by the community.

The EBS was completed at NAS Memphis in May 1994. Currently, a continuation of the EBS, known as the "Gray Area Investigation" is being conducted. The purpose of this investigation is to gather more information on areas of the Base that were not fully characterized in the original EBS.

#### ***BRAC Cleanup Plan***

The BRAC Cleanup Plan, or BCP, outlines procedures designed to prepare portions of NAS Memphis for community reuse as quickly as possible. It is a comprehensive, accelerated plan to improve environmental response actions. This plan is based on the findings of the Environmental Baseline Survey and a "bottom up" review of all past and ongoing environmental programs at NAS Memphis. The BCP was completed in March 1994, but requires regular updates due to the continually changing environmental findings on the base. Currently, the BCP is being updated and will include the most recent information collected from the Gray Area Investigation of the Environmental Baseline Survey.

### **ENVIRONMENTAL INVESTIGATIONS**

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In 1987, the first step of the RCRA corrective action process, the RCRA Facility Assessment, was completed. This assessment identified 58 sites, or solid waste management units, requiring further environmental investigation. Since that time, nine additional sites have been discovered, bringing the total number to 67. Field work for the investigations under the RFI began in November 1994.

Before field work could begin, sites were divided into sections so investigations could be more easily managed. Two zones were assigned: Zone 1 includes sites on the property that will be transferred to the community under BRAC; and Zone 2 consists of sites which will be retained by the Navy.

These zones were further divided into "assemblies" or groups. Eight groups (A - H) have been created according to waste sources, field sampling methods, and the type of investigation required. Next, the groups were prioritized based on known or suspected releases. Those that had the greatest potential for affecting human health were ranked highest. Environmental investigations are underway at Assembly A. Assemblies B and C are scheduled next.

#### ***Assembly A***

Currently, environmental investigations under the RCRA Facility Investigation are being implemented for Assembly A which consists of solid waste management units 1, 3, 5, 7, 8, and 60. Field screening surveys have been completed at Assembly A by using an innovative technology known as Direct Push Technology. Results of this screening were used to develop drilling plans for sampling and monitoring. Rotasonic drilling techniques were used to install 75 monitoring wells at Assembly A and five background locations.

Geophysical surveys have been completed at four solid waste management units. These surveys identified underground features and possible contaminant sources (e.g., landfills or underground storage tanks). By identifying these sources, the area identified as needing additional investigation was dramatically reduced.

As investigations are completed at Assembly A, and sample test results are interpreted, a work plan will be created to begin steps to clean up or remediate sites with contamination that exceeds action levels set by the U.S. Environmental Protection Agency.

#### ***Assemblies B and C***

RCRA Facility Investigation work plans have been developed for Assemblies B and C. The work plans detail how and when the investigations will take place. These work plans must receive approval from the United States Environmental Protection Agency and Tennessee Department of Environment and Conservation before implementation.

### **PUBLIC INVOLVEMENT**

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Public participation is encouraged in every step of the environmental restoration process at NAS Memphis. The Restoration Advisory Board, or RAB, is a group of community members, regulators, local and state organizations, and Navy representatives who meet bi-monthly to discuss progress and provide input on the environmental restoration activities. These meetings are open to the public and your attendance is welcomed.

Another source of information that has been made accessible to the community is the *information repository*. The repository is a collection of documents including work plans, fact sheets, the BCP, and other reports. Information repositories can be found at the Shelby County Library (Millington Branch), and the NAS Memphis Library.

NAS Memphis also maintains a mailing list of individuals and organizations that receive updates on environmental restoration issues. If you would like to be on the mailing list, would like more information about the Restoration Advisory Board, or have any questions about the ongoing environmental program, please contact the NAS Memphis Public Affairs Office.

<p><b>Public Affairs Office NAS Memphis Millington, TN 38053 (901) 873-5761</b></p>
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