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FACT SHEET 8 REGARDING CORRECTIVE ACTION PROCESS ON HAZARDOUS WASTE
SITE MILLINGTON SUPPACT TN
10/1/1995
NAVAL AIR STATION



Naval Support Activity Memphis
(formerly Naval Air Station Memphis)
 Millington, Tennessee

Fact Sheet 8

This is one in a series of fact sheets informing interested residents about the environmental investigations and remedial actions at Naval Support Activity (NSA) Memphis. Other fact sheets will be written at appropriate points in the program and in response to public interest. Distribution is coordinated through the NSA Memphis Public Affairs Office at (901) 873-5761.

Typical Site Cleanup

October 1995

This fact sheet was developed to describe the major steps that are taken to identify and clean up hazardous waste sites. Hazardous waste sites are those that have been affected by the use, storage, or disposal of hazardous materials (such as chemicals, pesticides, or petroleum products). The Navy, U.S. Environmental Protection Agency (EPA), and Tennessee Department of Environment and Conservation (TDEC) are working together, following these steps, to clean up NSA Memphis and prepare the property for transfer.

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 to protect human health and the environment. RCRA controls the generation, transportation, treatment, storage, and disposal of hazardous materials and wastes, like those mentioned above.

Part of this law governs the investigation and cleanup of hazardous waste sites and spills. This process is called Corrective Action. A review of the four Corrective Action stages is provided in the box to the right. To explain this process better, we have divided these stages into 10 steps which are described more fully on the following pages.

CORRECTIVE ACTION PROCESS	
I.	Preliminary Assessment of Site [RCRA Facility Assessment - RFA]
II.	Detailed Investigation of Site [RCRA Facility Investigation - RFI]
III.	Evaluation of Best Cleanup Options [Corrective Measures Study - CMS]
IV.	Site Cleanup, or "Remediation" [Corrective Measures Implementation - CMI]

More than 50 sites at NSA Memphis are being investigated according to the Corrective Action process. After investigation, it is likely that many of these sites will not require further action because contamination may not be found. However, for sites needing action, corrective action will follow the steps detailed in this fact sheet.

 **If you have any questions about the environmental program at NSA Memphis, please call the Public Affairs Office at (901) 873-5761.**

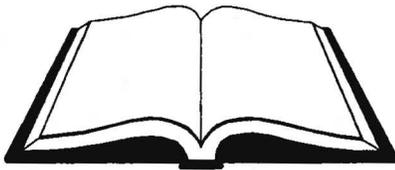
1. Site Discovery



- A site is identified through a preliminary study as potentially hazardous to human health or the environment. "Hazardous materials" may include chemicals, petroleum products, or pesticides.
- The preliminary study consists of a complete visual and historical review of the facility, including interviews and historic photographs.
- Sites may be identified for many reasons including past use, storage, or disposal of hazardous materials.

[RCRA FACILITY ASSESSMENT - RFA]

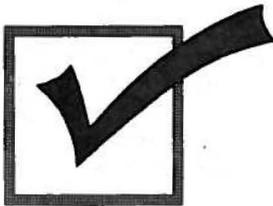
2. Report



- Once a site is identified, a report describing the condition of the site is written.
- The report includes background information on the site and any preliminary analysis of contamination that might be documented.
- The Navy then sends the report to the state and federal regulatory agencies (EPA and TDEC) for review and comment. These agencies oversee the environmental cleanup program.

[RCRA FACILITY ASSESSMENT - RFA]

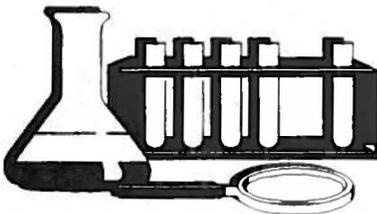
3. Work Plan & Approval



- A work plan is then written on how to technically evaluate the site.
- Portions of the work plan describe the sampling methods and laboratory tests that will be used. Another section details procedures for protecting the health and safety of site workers.
- The Navy must send the work plan to EPA and TDEC for approval.
- Work plans are written at several stages in the corrective action process and must be approved by the regulatory agencies.

[RCRA FACILITY INVESTIGATION - RFI]

4. Sampling



- Following the work plan's instructions, sampling begins. Water, air, soil, and/or sediment samples are taken, depending on the area that might be affected.
- Appropriate tests for the suspected contaminants are performed to determine the specific type of contamination.
- As a safety precaution, workers are required to wear protective clothing, ranging from gloves and work boots to full-body protective gear.

[RCRA FACILITY INVESTIGATION - RFI]

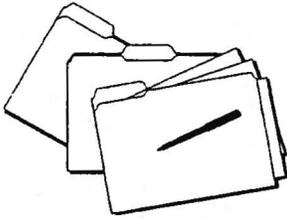
5. Analysis/Data Evaluation



- Water, air, soil, and sediment samples from the site are sent to a laboratory for analysis. The lab analyzes the samples to see what contaminants are at the site, and in what amounts.
- This information is used to determine if the amount of any material found is at safe levels, or if corrective action is required.
- Other scientists review associated human and ecological risk factors.
- The Navy then prepares a report to summarize these findings.

[RCRA FACILITY INVESTIGATION - RFI]

6. Cleanup Development



- Results from the analysis/data evaluation step provide the information needed to evaluate the cleanup options for the site.
- Based on this information, the Navy then prepares a report recommending the best option for that site. This report, called the Corrective Measures Study, is a general outline of the remedies that can be used effectively at the site.
- This report is sent to the regulatory agencies for their approval.

[CORRECTIVE MEASURES STUDY - CMS]

7. Remedy Selection



- Both regulatory agencies review the corrective measures plan independently. Together, the Navy and the regulatory agencies decide on the best option for the site.
- The remedy is selected based on many criteria, including overall effectiveness, feasibility, public input, and cost.
- After public comment, the final decision on the remedy will be made by the regulatory agencies.

[CORRECTIVE MEASURES STUDY - CMS]

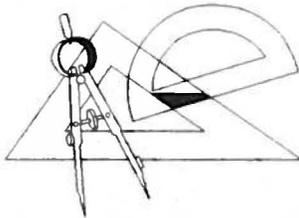
8. Public Comment



- **Wide public participation at this stage is strongly encouraged.**
- The cleanup options and the preferred option are announced to the public as well as the Restoration Advisory Board (RAB).
- The alternatives will be discussed in a public RAB meeting.
- Changes may be made to the proposed plan after the public's written and oral comments have been carefully considered.

[CORRECTIVE MEASURES STUDY - CMS]

9. Design of Remedy



- Once the appropriate option is approved, the Navy designs the methods to carry out that option, usually called the "remedy."
- The design stage requires writing a work plan that includes how the chosen remedy will work at the site and how to construct and operate the remedy, along with another health and safety plan for site workers.

[CORRECTIVE MEASURES IMPLEMENTATION - CMI]

10. Cleanup/Remediation



- Once the work plan is approved, the selected remedial action begins.
- This is technically called "remediation." Remediation may involve removal or treatment of contaminants, resulting in a cleanup; or it may involve containment, where the contaminants are prevented from moving off site where they could impact human health or the environment
- The remedy is monitored until complete.

[CORRECTIVE MEASURES IMPLEMENTATION - CMI]

Voluntary Corrective Action

In addition to the 10-step Corrective Action approach described in this fact sheet, the Navy is pursuing a quicker method of cleaning up select sites at NSA Memphis. This approach, called "Voluntary Corrective Action," allows the Navy, with the consent of EPA and TDEC, to take immediate action and speed cleanup at a site. Cleanup is required before the property can be turned over to the local community for reuse.

Sites with high priority for reuse and obvious contamination will be considered for Voluntary Corrective Action; for example, a site with known soil contamination may undergo immediate soil removal to eliminate the contamination. Samples of the remaining soil will be analyzed to determine if any contamination persists. If no contamination is found, soil cleanup for that site will be considered complete. However, if contamination is still present above acceptable levels, additional soil must be removed or the site will be scheduled for additional investigation and subsequent remediation.

The Voluntary Corrective Action initiative is an attempt by the Navy, EPA, and TDEC to clean up portions of NSA Memphis as quickly as possible so the property can be turned over to the local community for reuse.

Public Involvement

◆ Restoration Advisory Board

The Restoration Advisory Board is a group of citizens, Navy, city, state, and Environmental Protection Agency personnel that meets regularly to discuss progress on the environmental program at the base. These meetings are open to the public and attendance is strongly encouraged.

◆ Information Repository

Information repositories are collections of documents that include work plans, reports, and the Community Relations Plan. These document collections have been established as part of the Navy's program to inform the residents of Millington and surrounding communities about the environmental program at the base. Repositories can be found at two locations, listed to the right.

◆ Mailing List

NSA Memphis also maintains a mailing list of interested organizations and individuals who receive regular updates on the environmental program.

◆ For More Information

If you have any questions about the corrective action process, public involvement activities regarding the environmental restoration of NSA Memphis, or would like to be added to the mailing list, please contact the Public Affairs Office at the address or telephone number to the right.

Shelby County Public Library
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