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LETTER TRANSMITTING COMMENTS ON INVESTIGATION OF REMEDIATION  
ALTERNATIVES NAVY EXCHANGE SERVICE STATION MILLINGTON SUPPACT TN  
9/10/1992  
STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
Memphis Environmental Field Office  
Suite E-645, Perimeter Park  
2500 Mt. Moriah  
Memphis, Tennessee 38115-1511

September 10, 1992

CERTIFIED MAIL NO. P423971500  
Return Receipt Requested

Commanding Officer, Southern Division  
Naval Facilities Engineering Command  
2155 Eagle Drive  
P.O. Box 10068  
Charleston, SC 29411-0068

Attention: 18236 John Karlyk

RE: Investigation of Remediation Alternatives  
Naval Exchange Service Station  
NAS Memphis, TN  
Facility ID #9-791718, Shelby County

Dear Mr. Karlyk:

This office of the Division of Underground Storage Tanks has reviewed the USGS Proposal SC92J dated April 23, 1992, and the reports this office currently has on file for the above referenced site. The following items must be addressed prior to a Corrective Action Plan approval.

- 1) Page 7-1 of the Final Vacuum Extraction Pilot Study and Remedial Investigation Report dated November, 1990 states "Plume movement was not measurably detected." Please provide this office with current information on the hydrogeology of the site as specified in 1a. through 1f. of this Division's EAR Guidelines.
- 2) Page 4-1 of the Vacuum Extraction Pilot Study and Remedial Investigation Report refers to soil permeability testing. What type of tests were run? Section 1.E. "Procedure for Determining Soil Permeability" in the Environmental Assessment Guidelines must be followed to determine the appropriate soil clean-up level.

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- 3) Page 7-2 of the Vacuum Extraction Pilot Study and Remedial Investigation Report contains a reference to a third area of contamination near building 341 and adjacent to Old Navy Road where 3 USTs may have been (or are currently) located. It is recommended an investigation be initiated to determine if a source of contamination still exists at this location.
- 4) Page 2 of the referenced USGS Proposal only referred to a 1986 release of approximately 5,000 gallons of unleaded gasoline. Minutes of a meeting held August 2, 1990, as provided by G.C. Bradley, P.E. of the Remedial Actions Branch of the Department of the Navy, Southern Division, refer to "more than one source of contamination is suspected at this time." This should be clarified.

The USGS Proposal SC92J is acceptable to this Division with the following comments.

- 1) Applicable cleanup levels must be defined at this site by conducting Groundwater Classification and Soil Permeability tests in accordance with the Environmental Assessment Guidelines in the Tennessee UST Reference Handbook.
- 2) A Corrective Action Plan (CAP) must be submitted which follows this Division's CAP Guidelines no later than November 11, 1992.

A Corrective Action Plan must be submitted to this office no later than November 10, 1992.

Send one copy of all correspondence, including reports, to this office and one copy to:

Division of Underground Storage Tanks  
Tennessee Department of Environment and Conservation  
200 Doctors Building  
706 Church Street  
Nashville, Tennessee 37243-1541

Commanding Officer, Southern Division  
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If you have any questions concerning this correspondence, contact me  
at 901/543-6695.

Sincerely,



Glenn A. Birdwell  
Division of Underground Storage Tanks

GAB/lagr

cc: Nashville UST Central Office - Technical Review Section  
Memphis UST Field Office