

N00639.AR.002434  
NSA MID SOUTH  
5090.3a

LETTER REGARDING TENNESSE DEPARTMENT OF ENVIRONMENT AND  
CONSERVATION REVIEW AND APPROVAL OF TECHNICAL MEMORANDUM  
DATED 18 JULY 2015 SUB-PLUME D PESMW1S AREA OF CONCERN A SOIL AND  
GROUNDWATER INVESTIGATION MILLINGTON SUPPACT TN  
08/07/2003  
NAVFAC SOUTHERN



STATE OF TENNESSEE  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

Division of Solid Waste Management  
William R. Snodgrass Tennessee Tower  
312 Rosa L. Parks Avenue, 14<sup>th</sup> Floor  
Nashville, Tennessee 37243

August 7, 2015

Mr. Dave Barney, BRAC-PMO  
Base Realignment and Closure Program Management Office East  
4911 South Broad Street, Building 679  
Philadelphia, PA 19112

Re: Technical Memorandum, dated July 18, 2015  
Sub-Plume D PESMW1S (Area of Concern A) Soil and Groundwater Investigation  
Naval Support Activity Mid-South (NSA Mid-South), Millington, TN  
EPA ID. No.: TN2170022600, Permit Number: TNHW-149

Dear Mr. Barney,

The Division of Solid Waste Management (Division) has completed its review of the above referenced document. Resolution Consultants conducted a soil and groundwater investigation on behalf of NSA Mid-South upgradient of Sub-Plume D in the area of monitoring well PESMW1S. Groundwater monitoring data indicates increasing 1,1-dichloroethylene (1,1-DCE) and trichloroethylene (TCE) concentrations in groundwater. Resolution Consultants recommended additional investigation to evaluate whether a possible soil and/or groundwater source area was responsible for the increasing concentrations.

The investigation approach focused on seven locations upgradient of well PESMW1S where soil and groundwater samples were to undergo field analyses using an AQR Color-Tec sampler. Field personnel collected 21 soil samples and seven groundwater samples from seven upgradient boring locations. Soil sample depths ranged from 9-11 feet, 19-21 feet and 29-31 feet. Additionally, the sampling team collected four duplicate soil samples and three duplicate groundwater samples as confirmation samples for laboratory analysis.

Results of the investigation did not indicate a significant 1,1 DCE/TCE source area upgradient of well PESMW1S. Given the absence of a source area, the Navy proposes expanding the current Sub-Plume D treatment area by converting PESMW1S into an injection well which would create reductive conditions required to remediate the remaining 1,1-DCE and TCE concentrations in the area.

The Division approves the conclusions and recommendations contained within the report.

If you have any questions or comments concerning this review, please contact me at (615) 532-0864, or you may email me at [roger.donovan@tn.gov](mailto:roger.donovan@tn.gov).

Sincerely,

Roger Donovan, LPG  
Hazardous Waste Permitting

Mr. Michael Norman, U.S. EPA, Region 4  
Mr. Jim Heide, NSA Mid-South  
Mr. William Krispin, DSWM  
File Northside Groundwater (56)

Ms. Jamie Burroughs, DSWM  
Mr. Charles Burroughs, DSWM  
Mr. Herb Nicholson, Memphis Field Office, DSWM