



# EnSafe / Allen & Hoshall

a joint venture for professional services

April 16, 1997

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Commanding Officer  
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Subject: CTO-094; NSA Memphis RFI, Millington, Tennessee

Document Transmittal — *Voluntary Corrective Action Work Plan - SWMU 60 (Northside Landfill) Soil Removal (Revision 2)*, April 16, 1997

Reference: Contract N62467-89-D-0318 (CLEAN II)

Dear Sir:

Please find enclosed two copies of the *Voluntary Corrective Action Work Plan, SWMU 60 (Northside Landfill) Soil Removal (Revision 2)*. The document has been revised to incorporate verbal comments received at the March BRAC Cleanup Team (BCT) meeting. Responses to BCT comments are also enclosed. Both white and green covers have been included. Upon BCT approval of the work plan, the white covers should be removed and replaced with the green ones. As requested, copies have been distributed to the BCT and others as shown on the attached NSA Memphis RFI Distribution List.

If you have any questions or comments of a technical nature, please contact me, Jim Rathbone, or Robert Smith at 901/372-7962. Comments or questions of a contractual nature should be directed to Debra Blagg at 901/386-9344.

Sincerely,

EnSafe/Allen & Hoshall

By: Lawson M. Anderson, CHMM  
Task Order Manager

Enclosures: As Stated

cc: Contracts File: CTO-094 (w/out enclosure)  
Project File: 0094-29000 (w/out enclosure)  
Administrative Record: Sandra McClun, E/A&H (w/out enclosure)  
SOUTHDIV: Ms. Kim Reavis/Code 0233KR (w/out enclosure)  
Other: See attached NSA Memphis RFI Distribution List

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**Document Title:** *Voluntary Corrective Action Work Plan - SWMU 60 (Northside Landfill) Soil Removal (Revision 2)*  
**Document Date:** April 16, 1997  
**Distribution Date:** April 16, 1997  
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U.S. Evt. Protection Agency Attn: Brian Donaldson Waste Management Division Federal Facilities Branch 100 Alabama Street, SW Atlanta, GA 30303 (404) 562-8554	Priority O/N-FedEx	Brian Donaldson	<u>  3  </u>
TDEC—Division of Superfund Memphis Field Office Attn: Jim Morrison Suite E-645, Perimeter Park 2500 Mt. Moriah Memphis, TN 38115-1511 (901) 368-7958	Priority O/N-FedEx	Jim Morrison	<u>  1  </u>
TDEC— Division of Superfund Attn: NSA Memphis Project File 4th Floor, L & C Annex 401 Church Street Nashville, TN 37243-1538 (615) 741-5940	Mail	Project File	<u>  1  </u>
U.S. Geological Survey Water Resources Division Attn: Jack Carmichael 810 Broadway, Suite 500 Nashville, TN 37203 (615) 736-5424, Ext.3137	2nd Day-FedEx	Jack Carmichael (Nashville) Bill Parks (Memphis)	<u>  1  </u>
Memphis and Shelby Co. Health Dept. Attn: Brenda Duggar 814 Jefferson Avenue Memphis, TN 38105 (901) 576-7741	Mail	Brenda Duggar	<u>  1  </u>

**RESPONSE TO VERBAL USEPA AND TDEC COMMENTS  
VCA WORK PLAN SWMU 60 — REVISION: 1, March 7, 1997  
NSA MEMPHIS — MILLINGTON, TENNESSEE**

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1. Page 11: Take out all references to SWMU 5 groundwater and use background loess water quality data to classify as drinking versus non-drinking.

**Response:**

The requested changes were made and data from the loess background wells was introduced to the report in Table 3.

2. Page 11: Provide the loess boring logs as supporting evidence that the loess is consistent across the site.

**Response:**

The text was changed to state the loess and fluvial deposits boring logs indicate the shallow lithology at SWMU 60 is consistent, with no known sand stringers or major lithology variations. Also, the SWMU 60 loess and fluvial deposits boring logs are provided in Appendix A. Adding the boring logs as Appendix A changed the CHASP and SSHASP to Appendices B and C, respectively.

3. Page 14: Provide the SWMU 60 benzene and TPH concentrations in soil and groundwater to support the cleanup level determination.

**Response:**

The text of Section 4.3 was changed to include SWMU 60 TPH data for groundwater and benzene data for soil and groundwater.

4. Page 14, line 16: Delete "Division of USTs".

**Response:**

The requested change to the text was made.

5. Page 20, line 5: Delete "if necessary".

**Response:**

The requested change to the text was made.

6. Page 21, Section 5.2: Add statement that TDEC will be given 2 weeks notice before the start of work.

**Response:**

The requested change to the text was made.

7. Page 24, line 1: What if not approved?

**Response:**

The text was changed to state that if any water is not approved for discharge to the sewer, then the Navy will arrange for proper disposal of the water and E/A&H will be responsible for the collection of any water samples required by the disposal facility in order to obtain additional analyses for disposal of water.

8. Page 24, line 8: Provide location of borrow pit.

**Response:**

The text was changed to state the borrow pit is on the NSA Memphis Northside.

9. Page 24. Line 16: Describe the disposal of PPE, etc.

**Response:**

The text was changed to state the following: "Used PPE and disposable sampling equipment, such as plastic sheeting, will be profiled for disposal along with the excavated soil. Any used PPE or disposable sampling equipment will be stockpiled along with the excavated soil for loading and disposal following approval of the disposal profile. Shipyard Detachment personnel will be responsible for the proper disposal of all PPE and disposable equipment. Section 5.9, Investigation-Derived Waste, has additional information on waste disposal."

10. Page 25: Do we need other disposal parameters besides TCLP-TPH/benzene/lead?

**Response:**

The text was changed to state the following: "Additional analyses, such as metals or pesticides, may be required by the disposal facility and will be determined in conjunction with the selected waste disposal company at the time of waste profiling. E/A&H will collect any additional disposal samples and submit for the required analyses."

11. Page 27, line 9: State that the Shipyard Detachment HASP will be submitted to TDEC for review.

**Response:**

The requested change to the text was made.

12. SSHASP, Table 4-1: Add a column to show the instrument to be used.

**Response:**

The requested change was made and an additional column was added to Table 4-1 of the SSHASP listing the appropriate type of air monitoring device to monitor each potential expected chemical site hazard.