

**PUBLIC NOTICE OF A PUBLIC HEARING ON THE PROPOSED REISSUANCE OF A
CORRECTIVE ACTION PERMIT TO NAVAL SUPPORT ACTIVITY MID-SOUTH AND TO
APPROVE CORRECTIVE ACTION REMEDIES**

The Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM) proposes to reissue a corrective action permit to Naval Support Activity (NSA) Mid-South that would allow the facility to implement corrective action remedies. A Statement of Basis, which provides a justification for those remedies is also being public noticed. **A public hearing will be held at 5:30 p.m. on September 8, 2011 at the Baker Community Center, 7942 Church Street, Millington, TN 38053, (901-873-5770) to provide information about the permit and provide the public the opportunity to comment. From 5:30 to 6:00 p.m., prior to the formal portion of the hearing, the public is welcomed to review and ask questions about the permitting materials.** This action follows the pre-application public meeting conducted by the facility on November 29, 2005, as required by Tennessee Rule 1200-01-11-.07(2)(c)3(i), and was held in conjunction with the Restoration Advisory Board meeting.

NSA Mid-South, EPA ID Number: TN2 17 002 2600, located at 5722 Integrity Drive, Millington, Shelby County, Tennessee 38054-5045, is currently permitted under Tennessee Permit Number TNHW-094. The previous Hazardous Waste Storage Permit was issued on September 24, 1996. The current permit was effective for ten years. As of September 28, 2006, the storage portion of the Hazardous Waste Container Storage Permit was terminated upon closure of the unit. However, the requirements for corrective action remained in effect. NSA Mid-South submitted a Part A and Part B Application to DSWM for renewal of the facility's corrective action permit on March 28, 2006, thus enabling the facility to continue to perform corrective action under the current permit until a final decision is made. The proposed permit is for the implementation of final remedies for many of the Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that require corrective measures. A Fact Sheet has been prepared that summarizes the draft permit requirements.

The Fact Sheet includes Statements of Basis (SB) that recommend remedies for many of the releases identified during the corrective action process and is designed to facilitate public participation in the remedy selection process. The SB summarizes the nature and extent of the contamination, the potential risks to human health and the environment, and the remedy to be implemented. The permit proposes a final remedy that requires NSA Mid-South to maintain institutional controls to limit the possibility of exposure to contaminants. Additionally, the permit requires NSA Mid-South to perform groundwater monitoring at SWMU 2, the closed Southside Landfill. The groundwater protection standard was established to be protective of the surface water body into which the groundwater discharges, Big Creek Drainage Canal. In addition to corrective action, under the conditions of this permit, NSA Mid-South will also be required to notify of imminent hazards; and as applicable, comply with the requirements developed under land disposal restrictions and organic air emission standards. If issued, the permit will be valid for 10 years.

The permit is proposed to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101 et seq., and Rule Chapter 1200-1-11, Hazardous Waste Management.

Copies of NSA Mid-South's application, draft permit, fact sheet, statements of basis and public notice are available for public inspection at the Millington Public Library, 4858 Navy Road, Millington, TN, 38053 (901-872-1585) and the Millington Civic Center, 8077 Wilkinsville Road, Millington, TN 38053-1855 (901-873-5770). These materials are also available for public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Memphis Environmental Field Office (MEFO), 8383 Wolf Lake

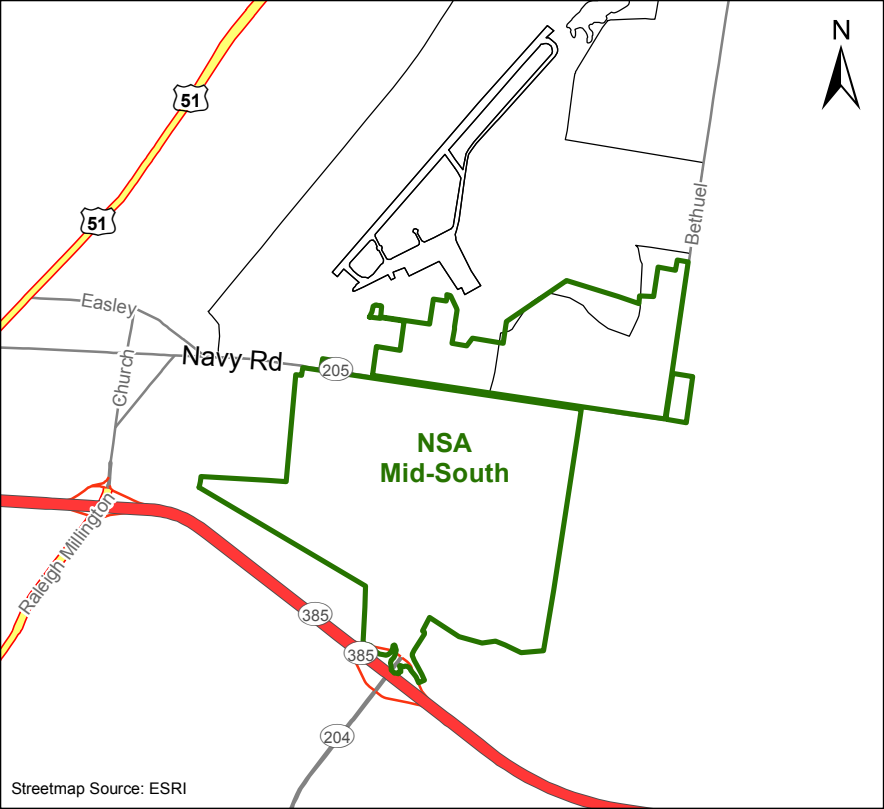
Drive, Bartlett, TN 38133, (901-371-3000), and at the DSWM's Nashville Central Office located on the 5th Floor, L & C Tower, 401 Church Street, Nashville, Tennessee 37243-1535 (615-532-0780).

All persons, including the applicant, may submit written comments on DSWM's proposal or obtain further information by contacting Mr. Roger Donovan; Corrective Action Section; Division of Solid Waste Management; Tennessee Department of Environment and Conservation; 5th Floor, L & C Tower; 401 Church Street; Nashville, Tennessee 37243-1535; telephone (615) 532-0864; or e-mail to Roger.Donovan@tn.gov. **Comments must be received by 4:30 p.m., Friday, September 23, 2011 to assure consideration.** After considering all public comments, the Division Director will issue a final permit decision and a Response to Comments.

Individuals with disabilities who wish to participate in these proceedings (or to review these filings) should contact the Tennessee Department of Environment and Conservation to discuss any auxiliary aids or services needed to facilitate such participation. Such contact may be in person, by writing, telephone, or other means and should be made no less than ten days prior to the **September 8, 2011 hearing**, to allow time to provide such aid or services. Contact the ADA Coordinator at 1-866-253-5827 for further information. Hearing impaired callers may use the Tennessee Relay Service (1-800-848-0298).

Persons who wish to be on DSWM's mailing list should request a Mailing List Request form by calling or writing: Public Participation Officer; Division of Solid Waste Management; TDEC; 5th Floor, L & C Tower; 401 Church St.; Nashville, TN 37243-1535; (615-532-0798) or e-mail solid.waste@tn.gov.

NOTICE ISSUED: August 8, 2011



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Easley

Church

Navy Rd

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Bethuel

**NSA
Mid-South**

Raleigh-Willington

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FACT SHEET

INTENT TO REISSUE A HAZARDOUS WASTE MANAGEMENT CORRECTIVE ACTION PERMIT AND TO APPROVE CORRECTIVE ACTION REMEDIES

Permittee: Naval Support Activity (NAVSUPACT) Mid-South

Facility Name: Naval Support Activity (NAVSUPACT) Mid-South

Location: 5722 Integrity Drive
Millington, Tennessee 38054-5045

EPA ID Number: TN2 17 002 2600

Facility Owner: Naval Support Activity (NAVSUPACT) Mid-South

Facility Operator: Commander, Naval Support Activity (NAVSUPACT) Mid-South

Facility Contact: James E. Heide
Installation Environmental Program Manager
Environmental Department
Department of the Navy
Naval Support Activity Mid-South
5722 Integrity Drive
Millington, Tennessee 38054-5045
Phone: (901) 874-5367

Regulated Units: The corrective action permit is only for remedial action of facility solid waste management units (SWMUs) and areas of concern (AOCs) and does not allow for storage, treatment or disposal of hazardous waste.

Comment Period: **Begins: August 9, 2011**
Ends: September 23, 2011

Public Hearing: **September 8, 2011**
Open time for Questions and Answers: **5:30 p.m.**
Formal Hearing and Comment Period: **6:00 p.m.**
Baker Community Center, 7942 Church Street,
Millington, TN 38053, (901-873-5770)

FACILITY DESCRIPTION

Naval Support Activity Mid-South (NSA-Mid-South) is a U.S. Navy Facility located in Millington, Shelby County, Tennessee. It is approximately 20 miles north of the downtown area of Memphis, Tennessee and 13 miles east of the Mississippi River. The facility is bordered on the west and the south by the City of Millington and on the east and north by agricultural and residential areas.

NSA Mid-South, formally Naval Air Station (NAS) Memphis, began as Park Field, an Army Signal Corps Aviation School used to train pilots and ground crews for service with the Allied Forces during World War I. When commissioned as a Naval Reserve Air Base on September 15, 1942, the primary mission of the base remained much the same – to train a new generation of aviation cadets for action in World War II. On January 1, 1943, the installation was designated a naval air station. The station at that time encompassed only the area called the “Northside,” located north of Navy Road. In 1949 all support logistics requirements of activities aboard the naval reserve, except the Naval Hospital, were assigned as responsibilities of the Naval Air Station. Since that time, NAS Memphis had grown from 2,200 acres to 3,490-acre installation and was once known as the largest inland naval air station (by population) in the world. The runways and associated operations were located north of Navy Road, as was the Naval Hospital. Because the primary mission of NAS Memphis was training, no large-scale industrial, ordnance or radiological operations were performed.

A part of the Navy Region Midwest and the Navy Installations Command, NSA Mid-South serves as the Navy's Human Resources Center of Excellence. Headquartered onboard NSA Mid-South are Navy Personnel Command, Navy Recruiting Command, the Navy Manpower Analysis Center, as well as the U.S. Army Corps of Engineers Finance Center.

The 1993 Base Realignment and Closure Commission directed the realignment of Naval Air Station Memphis. On September 30, 1995, NAS Memphis was designated Naval Support Activity Memphis. The name was changed to Naval Support Activity Mid-South on October 1, 1998, to more closely identify the base's mission requirements and to reflect the Navy's approach to regionalization. The airfield, associated support operations, and undeveloped land on the northern portion of the installation (1,867 of the total 3,446 acres) were transferred to the City of Millington. The facilities on the remaining 1,579 acres, primarily on the southern portion of the installation, were realigned as Naval Support Activity.

Today, the Naval Support Activity operates and functions with an allowance of approximately 6000 enlisted and officer personnel, civilians, and full-time contract personnel, who provide all essential logistic and operational support to the commands and activities on board.

PURPOSE

This fact sheet is prepared pursuant to Tennessee Rule 1200-01-11-.07(7)d for the draft permit developed by the Tennessee Department of Environment and Conservation's (TDEC) Division of Solid Waste Management (DSWM). The renewal permit is being public noticed by the DSWM. The purpose of this permitting process is to afford any interested persons the opportunity to evaluate the ability of the permittee to apply the applicable hazardous waste management requirements. The proposal is for the renewal permit to be reissued under the authority of the Tennessee Hazardous Waste Management Act of 1977, as amended, Tennessee Code Annotated, Section 68-212-101, et. seq., and Tennessee Rule Chapter 1200-01-11, Hazardous Waste Management. The permit is prepared in accordance with the provisions of Tennessee Rule 1200-01-11-.07.

CORRECTIVE ACTION UNDER THE PREVIOUS AND PROPOSED PERMITS

The current permit for the storage unit, TNHW-094, was issued to NSA Memphis on September 24, 1996 and was effective for ten years. The permitted hazardous waste storage area was closed on September 28, 2006. However, the permit remained in effect due to the requirement to perform corrective action at all solid waste management units (SWMUs) and areas of concern (AOCs) outlined in Section IV of the current storage permit. Tennessee Hazardous Waste Management Regulations require that the facility submit the renewal application before the current permit expires. NSA Mid-South submitted the Part A and Part B hazardous waste permit renewal applications for corrective action on March 28, 2006, to the DSWM, thus, enabling NSA Mid-South to continue corrective action until a final permit decision is made. NSA Mid-South held the required pre-application meeting for the renewal application on November 29, 2005, as public noticed on October 30, 2005 in the Memphis Commercial Appeal. The public meeting coincided with the Restoration Advisory Board meeting. Three citizens attended the public meeting.

There are 67 SWMUs and one AOC identified at NSA Mid-South. Of the 67 SWMUs identified in the permit, 32 units are located on transferred property. Fifty-three of the 68 SWMUS were determined to be no further action (NFA), through a RCRA Facility Assessment (RFA), confirmatory sampling (CS), RCRA facility investigation (RFI) or after interim measures (IM). Of the remaining fourteen SWMUs, nine require implementing a remedy, and five require completion of corrective measures study (CMS) before the final remedy can be selected and public noticed. The one Area of Concern, AOC A, Northside Fluvial Groundwater, is also completing a CMS. Part of the CMS (for the five SWMUs and AOC A) includes corrective action interim measures. These ongoing cleanups may be incorporated into their future final remedy selections. The permit requires NSA Mid-South to implement the selected corrective action remedies at eight SWMUs located on transferred property and one SWMU (SWMU 2, Southside Landfill) located on the active portion of the base.

The draft permit also contains conditions for continued corrective action of newly discovered SWMUs and AOCs. NSA Mid-South shall be required to investigate any releases of hazardous waste or hazardous constituents pursuant to this permit, regardless of the time at which waste was placed in a unit, and to take appropriate corrective action for any such releases. The permit conditions also require notification of imminent hazards, and when applicable, compliance with the requirements developed under the land disposal restrictions and organic air emission standards.

NSA Mid-South is also performing corrective action in accordance with the Military Munitions Response Program (MMRP) regulations. Under the MMRP, facilities are required to investigate and perform corrective action for munitions units such as artillery and other firing ranges. NSA Mid-South has identified six MMRP units including pistol, rifle, skeet and aircraft firing ranges.

Attached to this Fact Sheet is the SWMU and AOC Change of Status Table. Note that some NFA units were reevaluated in accordance with new federal guidance and remain no further action after that reevaluation. The Draft Permit and Statements of Basis that explain the basis and recommendations for final remedy selection for many of the SWMUs and AOCs at NSA Mid-South can be reviewed at the repositories noted under the Comments section that follows.

COMMENTS

Copies of NSA Mid-South's application, draft permit, fact sheet, statements of basis and public notice are available for public inspection at the Millington Public Library, 4858 Navy Road, Millington, TN, 38053 (901-872-1585) and the Millington Civic Center, 8077 Wilkinsville Road, Millington, TN 38053-1855 (901-873-5770). These materials are also available for public inspection during normal business hours, 8:00 a.m. to 4:30 p.m., Monday through Friday, except legal holidays, at the TDEC Memphis Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133, (901-371-3000), and at the DSWM's Nashville Central Office located on the 5th Floor, L & C Tower, 401 Church Street, Nashville, Tennessee 37243-1535 (615-532-0780).

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SWMU and AOC Change of Status Table

SWMU/ AOC	SWMU/AOC Name	Unit Description	Current Permit Status	Proposed Permit Status	Rationale
2	Southside Landfill (Assembly E)	Sludges, oils, solvents, solid waste	RFI	Final Remedy	Alternate Concentration Limit Technical Memorandum submitted 1/16/2010 with proposed remedy; approval from TDEC 6/24/2010
3	Building N-121 Plating Ship Dry Well	Possible disposal area for plating wastes	RFI	NFA	Interim Measures Report submitted 1/7/04 with no further action decision; approval from TDEC 2/13/04. Loess groundwater contamination incorporated into AOC A
5	Aircraft Fire Training Area	JP-4, solvents, oils, VOCs, SVOCs, TPH, metals, pesticides, herbicides	NFA	NFA	Technical Memorandum to RFI submitted 2003 with no further action decision; approval from TDEC and EPA in May and August 2003
7	Building N-126 Plating Ship Dry Well	Acid, CN, mineral spirits, paint thinners, TCE, TCA, paint, lubricants, fuel, hydraulic fluid, MEK, engine oil, diesel., VOCs, SVOCs, TPH, metals, pesticides, herbicides	RFI	Final Remedy	Institutional Controls, Loess groundwater contamination incorporated into AOC A
9	Sewage Lagoons (Assembly E)	Part of sanitary wastewater treatment system	RFI	NFA	Remedy proposed in RCRA Facility Investigation Report; EPA and TDEC approval in 2001. Further review by TDEC changed remedy to NFA
15	N-94 Underground Tank Farm	Petroleum Products, waste, paint solvents	RFI	NFA	No further action in Excavation Summary Report for Additional Soil Remediation (Interim Measures) dated 1/11/06, approved by TDEC 3/14/06
19	N-757 Underground Waste Tank (formerly 341 and 1648 UST)	Waste oil and hydraulic fluid	RFI	NFA	No further action in Excavation Summary Report for Additional Soil Remediation (Interim Measures) dated 1/11/06, approved by TDEC 3/14/06
20	1594 Underground Waste Tank	Stored waste oil and hydraulic fluid	CMI	NFA	No Further Action proposed in Draft RFI report was approved by TDEC and USEPA in March and April of 2001, respectively
23	S-8 Underground Fuel Tank	Stored fuel oil, diesel	NFA	NFA	NFA proposed in Assembly G & H Confirmatory Sampling Report; TDEC approval 5/19/00

SWMU AOC	SWMU/AOC Name	Unit Description	Current Permit Status	Proposed Permit Status	Rationale
24	N-114 Auto Hobby Shop Waste Oil Tanks	Lubricating oils, grease and hydraulic fluids	RFI	NFA	NFA proposed in VCA Report; EPA and TDEC approval 6/29/01
30	Park Field Waste Treatment Center	Domestic sewage, oils, solvents and waste paints	NFA	NFA	NFA in Assembly F Confirmatory Sampling Report; approval from TDEC 6/7/99
41	Salvage Yard No. 2	Scrap metal, tires, batteries, wood	RFI	NFA	NFA was recommended for the site in a Technical Memorandum submitted to TDEC (EnSafe, 2005). TDEC concurred with the recommendation on 6/21/05
43	Hazardous Waste Accumulation Point at Building W-176	Solvents, waste paints, paint strippers	RFI	NFA	The RFI report for Assembly G and H recommended a NFA for SWMU 43, approved by TDEC in January 2003
45	Hazardous Waste Accumulation Point @ Bldg. S-142 (Assembly G)	Drummed paint wastes including solvents and paint strippers	NFA	NFA	NFA proposed in Interim Measures Report submitted in 1995; EPA approval 1/19/96
46	Hazardous Waste Accumulation Point @ Bldg. S-140 (Assembly G)	Waste Paint	CMS	NFA	Addendum to report 8/13/02 recommended an NFA for soils, approved by TDEC on 1/13/03. Groundwater being handled as part of SWMU 14
47	Hazardous Waste Accumulation Point at Building 344	Mineral Spirits	RFI	NFA	NFA proposed in VCA Report; TDEC approval 8/24/01
48	Hazardous Waste Accumulation Point at Building S-9	Petroleum products, waste paint, solvents	RFI	NFA	NFA proposed in VCA Report; TDEC approval 8/24/01
49	Hazardous Waste Accumulation Point at Building N-757	Spent battery storage, mineral spirits and paint wastes	RFI	NFA	NFA proposed in VCA Report; EPA and TDEC approval 2/04
59	Pesticide Storage Facility (Old Pesticide Shop)	Stored DDT, dieldrin, chlordane, and arsenic based pesticides	RFI	NFA	NFA proposed in RCRA Facility Investigation Report; EPA and TDEC approval in 2001
61	Building N-26 – Former Printing Shop (Assembly G)	Building N-26 – Former Printing Shop (Assembly G)	NFA	NFA	NFA in Confirmatory Sampling Report Assembly G&H; TDEC approval 5/19/00
63	Underground Waste Tank S-75N	Accumulation of wastes from central heating plant; MEK, acetone, ethyl benzene, toluene and xylene	RFI	NFA	NFA proposed in RCRA Facility Investigation Report; EPA approval 4/3/01 and TDEC approval 3/7/01

NFA—No Further Action
RFI—RCRA Facility Investigation
VCA—Voluntary Corrective Action

CS--Confirmatory Sampling
CMS—Corrective Measures Study
AOC A—Northside Groundwater