



# USACE, MOBILE DISTRICT

PROPULSION WIND TUNNEL 16S COMPLEX PCB COMPLIANCE PLAN  
*Arnold Air Force Base, Tennessee*

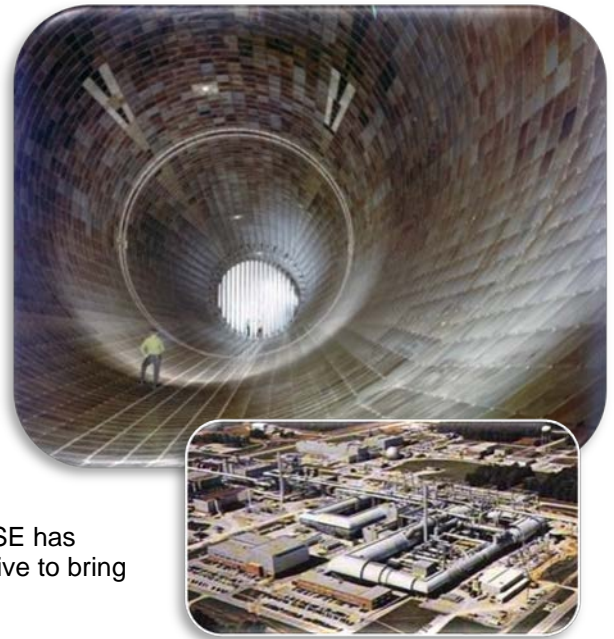
## PROJECT HIGHLIGHTS

### CLIENT PROFILE

Under a task order for U.S. Army Corps of Engineers (USACE) Mobile District, MSE is supporting the Arnold Engineering Development Complex at Arnold Air Force Base (AFB) in developing a polychlorinated biphenyls (PCB) compliance plan that will achieve Toxic Substances Control Act (TSCA) regulatory compliance, maintain worker health and safety, and protect the environment from PCBs during reactivation and ongoing operation of the Propulsion Wind Tunnel (PWT) 16S Complex including its supporting facilities (portable model carts and Model Installation Building 760).

### PROJECT OVERVIEW

The PWT 16S Complex at Arnold AFB was the first large-scale facility for testing jet and rocket engines in simulated high-speed flight conditions. To comply with TSCA and because PCBs were used in many hydraulic systems in the 1960s and 1970s, a basewide effort was initiated to identify and replace all PCB-containing fluids. Some PCBs, however, were left in place. MSE has been supporting Arnold AFB since 2017 in its mission-critical directive to bring the PWT Complex back online by 2019.



### CHALLENGES

- Technically complex remedial project with regulatory interface and client partnering
- Develop procedures to maximize program efficiency and support compliance objectives
- Provide support to meet an aggressive deadline for PWT reactivation

### THE MSE GROUP APPROACH

The firm's two-phased approach has involved development of a project management plan (PMP) and project data quality objectives (DQO). The PMP presents the overall framework for the sampling plan design and TSCA regulatory compliance to support facility reactivation and protect worker health and safety. The project DQOs identify specific data needs, data quality requirements, data-collection methods, and how these data can be used in the management decision-making process.

During Phase 1, the firm gathered background data and conducted an initial field assessment for the presence/absence of dioxins/furans and PCBs, which would significantly affect the Phase 2 characterization sampling approach. Output from Phase 1 is being developed into a Phase 2 Work Plan that will include comprehensive sampling, data analysis, mitigation recommendations, and development of a TSCA PCB Compliance Plan.

### ACCOMPLISHMENTS

- Successfully completed data collection and field assessment (Phase 1)
- Identified specific data needs and requirements
- Developed a regulatory PMP that outlined steps necessary for compliance

### AREAS OF EXPERTISE

- Permitting and TSCA compliance
- Data collection and data quality
- PCB monitoring and mitigation
- Worker health and safety