



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 274

BRAC CLEANUP TEAM

SEPTEMBER MEETING MINUTES

September 17 and 18, 1997

CONCURRED: December 10, 1997

**MEETING MINUTES
BRAC CLEANUP TEAM
BRAC AND SCREENING SITES DATA EVALUATION WORKSHOP
September 17 through 18, 1997**

In Attendance

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Glenn Kaden	DDMT	(901) 775-4510
Shawn Phillips	DDMT	(901) 775-6372
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Jordan English	TDEC	(901) 368-7953
Dann Spariosu	U.S. EPA Region IV	(404) 562-8552
Ramone Torres	U.S. EPA Region IV	No Phone Available
Terry Templeton	TDEC	(901) 368-7957
Julian Savage	CEHNC	(205) 895-1642
Mike Dobbs	DDRE	(717) 770-6950
Greg Underberg	CH2M HILL/ORO	(423) 483-9032
Vijaya Mylavarapu	CH2M HILL/GNV	(352) 335-5877

Abbreviations

GU = Greg Underberg	DS = Dann Spariosu	GK = Glenn Kaden
JE = Jordan English	TT = Terry Templeton	SP = Shawn Phillips
JS = Julian Savage	VM = Vijaya Mylavarapu	DC = Denise Cooper
RT = Ramone Torres		

Acronyms

ASAP	as soon as possible
BCT	BRAC Cleanup Team
BRAC	Base Realignment and Closure
RBC	Risk Based Criteria
UCL95	95% Upper Confidence Limit
µg	microgram
mg	milligram
kg	kilogram
ng	nanogram
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEHNC	U.S. Army Corps of Engineers, Huntsville.
PCB	polychlorinated biphenyl
PRE	Preliminary Risk Evaluation
TBD	to be determined
FOSL	Finding of Suitability to Lease

BCT Meeting Minutes September 17 and 18, 1997

Action Items

Summary of Action Items from September 17 & 18 BCT Meeting		
Action Item	Responsible Party	Date
Contact Harold Roach and determine if floor drains in Buildings 251 and 265 are connected to the sanitary sewer.	Shawn Phillips	TBD
Determine if there was a grease pit in Building 251, as suggested by the EBS.	Shawn Phillips	TBD
Additional surface soil sampling at Parcel 30.2. Number of sample locations and analyses were not identified.	Julian Savage (contracting), CH2M HILL (execution)	TBD
Take two surface soil samples in Parcel 10.3. Analyzed for constituents appropriate to hydraulic fluid and battery acid spills. Both samples will be taken directly adjacent to the road and along the roadway.	Julian Savage (contracting), CH2M HILL (execution)	TBD
Take four surface soil samples in Parcel 12. Two samples are to be taken from the west end of Building 629, one on the north side, and one on the south side. Analyze for TCL and TAL.	Julian Savage (contracting), CH2M HILL (execution)	TBD
Perform a walk-through of buildings in Parcels 19.2 and 19.3. Determine if hazardous materials could have been spilled	Shawn Phillips	TBD
Provide to BCT the Sample Railroad Track Background Document from Glenview NAS.	Ramon Torres	TBD

Opening Statement

SP: The discussion at the beginning of the September BRAC BCT Meeting dealt with some of the buildings that we discussed at August's meeting, and the CERFA categories of those buildings. Three buildings in particular that were in question are the Cafeteria (Building 274), an Auto Shop (Building 770), and the Hazardous Materials Storage Building (Building 835). All of these buildings were CERFA Category 7. The proposed changes after our discussion are for Building 274 to a Category 6. This is because of a potential voluntary removal around the foundation of the building of PCB-contaminated soil. For Building 770, since we don't know what the future action is going to be required there, because the RI is not finished yet, we are comfortable moving that to a CERFA Category 6, although it is likely there are not going to be any future actions, but we don't know that for sure yet. Building 835, the assumption is that while there are most likely operational spills inside the building, we have documentation that those spills were all cleaned up when they occurred. Therefore, all the remedial actions have been taken—that is a CERFA Category 4. So in

summary, Building 274 moved from 7 to 6, Building 770 moved from 7 to 6, and Building 835 moved from 7 to 4.

Parcel 1

SP: Two BRAC samples are available. Both exceeded the residential RBC for dieldrin. One of the two exceeded the industrial RBC at 590 ppb and the number (industrial RBC) is 360. So basically, all the buildings that are within Parcel 1 are already CERFA Category 1, so we don't need to change any of the buildings. The parking lots themselves, with the dieldrin detections and with the dieldrin issue not being resolved yet; Ramone proposes, I'm assuming TDEC is agreeing, that those are still Category 7 because that issue has not been resolved.

GU: That concludes Parcel 1. The non-buildings in Parcel 1 are remaining Category 7 because it has the dieldrin issue which has not yet been resolved.

Parcel 2

GU: In summary, Parcel 2.7, which is the grassy area surrounding the four residential buildings in Parcel 2. We have detections of dieldrin in three of the four BRAC samples there that are above the residential criteria. Gamma chlordane was found in the fourth. The results of one detection of chlordane is above criteria as well. Therefore due to these pesticides, further assessment and potentially remedial action will be required there, and this parcel is therefore categorized as CERFA Category 6.

Parcel 3

GU: Since there is need for additional assessment in Parcel 3, there is no change from the current category of 7.

Parcel 4

GU: This is an update of Parcel 4 and associated subparcels. Parcel 4.1 will remain as Category 1. Parcel 4.2 will remain as Category 1. Parcel 4.3 will remain as Category 1. Parcel 4.4 remains as Category 3. All of these are based on the fact that there has been no new data collected from these subparcels. Parcel 4.6 is considered Category 6 due to oncoming removals associated with UST tanks in those areas. There is a disconnect within the environmental baseline study regarding the map for Parcel 4.7. The description of Parcel 4.7 consists of Building 257; however, the map shows it to be a circular area surrounding it which is in fact part of Parcel 4.5. The same applies to Parcel 4.6, Building 254 is Parcel 4.6. The surrounding area is associated with Parcel 4.5. Again in the EBS.

RT: Parcel 4.6 will include Building 254 plus approximately 154 feet of the grassy area called the fuel field which is where the UST tanks are removed.

DC: Actually about 50 feet of the grassy area.

RT: We already changed that to a Category 6.

GU: How did we change it to a 6, what's the basis for 6?

SP: We're going to be removing tanks. So that's a remedial action.

RT: The building per se is just a little shed will be included in that change.

SP: BRAC Parcel 4.8, which is Building 263, Ramon read from the environmental baseline study that there was fumigation inside that building although it is a small storage area. So categorization of Parcel 4.8 will depend on the results of the air sampling for the fumigation buildings, i.e., it stays a CERFA Category 7.

GU: There were two boreholes outside of Building 263 that had no detections.

SP: 4.9 is going to stay gray.

GU: Because of the need to perform the RI on Site 58.

SP: Portions of it could also be a Category 6 because it's going to come out.

DC: It's not broken down.

SP: I know it's not broken down. We're saying both.

GU: Just keep it as it is. Keep it as a 7.

SP: Okay.

GU: 4.9 is a 7.

SP: It (Site 58) is also an RI site which will go through the RI.

GU: Correction on Parcel 4.9. There's only one dieldrin detection which is fairly low.

GU: Parcel 4.10 will remain at a Category 7 because of the need to take it through a risk assessment due to benzopyrene detections at SB59B and two dieldrin detections at SS59E and SB59B.

GU: Parcel 4.11 consists of Building 253 will be changed to a Category 6 based on the soil surrounding 4.11 and the elevated PAHs in SB66A. Due west of the building, it is likely that some kind of action, possibly a removal action associated with the boulevard construction in that area, will require further assessment.

GU: Parcel 4.12, Building 251, will be evaluated tomorrow with a walk through due to the presence of waste oil tanks.

GU: We will have to take a walk though on Parcel 4.13, Building 265, tomorrow to evaluate the storm drains in the building.

GU: Parcel 4.5 will remain at Category 7 because of numerous RI samples that are located in the parcel.

Parcel 5

GU: Looking at Parcel 5.1, there are two samples associated with it. Samples SS58D is an RI sample, and BRAC sample A(5.1). There were no exceedances of any constituents in either of those samples.

GU: Based on this information, Parcel 5.1 is considered a CERFA Category 3 parcel.

Parcel 4

GU: For Building 251, a site visit was made and two floor drains were discovered. The floor drains will be evaluated to see if they are in connection with the sanitary sewer. If they are in connection with the sanitary sewer, then there's no need for further investigations at the facility.

GU: At Building 251 there was also reputed to be a waste oil tank. A waste oil tank was not observed during the visit.

GU: The EBS would appear to be in error for Building 251. There was not a tank identified in the storage tank survey document submitted in November 1993, and there was also not a tank identified in the location plan of tanks, final revision, 4 January 1990.

GU: We are going to revisit 251 and evaluate a report that there is a grease pit in the building. Those who performed the walkover of Building 265 did not identify any drains that could have been connected to the storm sewer. Same action will be taken as for 251. Harold Roach of the Facilities Division will be contacted to determine if there is a connection between drains in 265 and the sanitary sewer.

GU: Parcels 4.12 and 4.13 will be left as Category 7 until the issues with Buildings 251 and 265 are resolved.

Parcel 6

GU: Parcel 6.1, which is the area between the buildings within Parcel 6, stays as a Category 7 due to detections of dieldrin in three surface soil samples. PCBs were also found at 2.9 ppm in sample A(6.1), which is above residential but just at the industrial RBC value. For the rest of Parcel 6, which is Parcels 6.2 (Building 250), 6.3 (Building 349), and 6.4 (Building 350): we discussed that there was some acid staining in Buildings 350 and 250; however, that was contained in the building and would likely be an OSHA issue rather than a CERCLA issue. Therefore, Buildings 250, 350, and 349 will be CERFA Category 7 pending the results of the air sampling.

Site 70, Railroad Tracks

GU: How will we be evaluating the PAH concentrations along the railroad tracks? The concept was proposed to develop a site-specific background value for the railroad tracks using existing PAH data. We will also evaluate data that was collected outside of Site 70 that intersects the railroad tracks for inclusion as Site 70 data. This will be primarily the screening and the RI site data and include those in the database.

GU: The BCT will evaluate the sample selection, as well as the data proposed for the background population of the railroad tracks. The intent based on that collection of data is to identify outliers that would constitute an impact on the railroad vs. a baseline population that would define the background PAH associated with the railroad. Ramone Torres will provide a sample document for this "Facility Background" approach that was used at a similar BRAC facility.

Parcel 7

GU: To conclude Parcel 7, Parcel 7.2, Building 249, will remain at Category 7 pending the results of the air sampling; and Parcel 7.1, which is the grounds surrounding Building 249, will be CERFA Category 6 due to the PAH levels associated with the samples along the railroad tracks.

Parcel 8

GU: The four buildings within Parcel 8; Parcels 8.2, 8.3, 8.5, and 8.4, will remain as Category 7 pending the results of the air sampling. Parcel 8.1, which is the grounds surrounding the buildings, will remain at Category 7 pending resolution of the dieldrin detections in three of the soil samples in that area.

Parcel 9

GU: The four buildings in Parcel 9 associated with Parcels 9.2, 9.3, 9.4, and 9.5 remain at CERFA Category 7 pending the results of the air sampling. Parcel 9.1, which is the external area of the buildings, remains in Category 7, which also includes the railroad tracks (Screening Site 70), because of dieldrin detections in three of the BRAC samples in Parcel 9.1, as well as the need to evaluate the railroad tracks as a screening site.

Parcel 10

GU: Parcel 10.1, which is currently Category 3, will remain Category 3. There was no additional data collected near it. Parcels 10.4, 10.5, and 10.6, which are the other three buildings in Parcel 10, will remain Category 7 pending the results of air sampling. Parcel 10.2, which is the area between the buildings including the railroad tracks, will remain Category 7 due to dieldrin. That issue has to be resolved along with the railroad tracks that bisect Parcel 10. There were 4 dieldrin hits associated with Parcel 10.2. For Parcel 10.3, that parcel is associated with a spill reportedly of hydraulic fluid and battery acids. Samples were not taken from that parcel; therefore, we have determined that two samples will be

collected within that parcel for constituents appropriate to hydraulic fluid and battery acid. Both samples will be directly adjacent to the road along and along the roadway.

Parcel 11

GU: The buildings, Parcels 11.2, 11.3, and 11.4, will remain Category 7 pending the results of the air sampling. Parcel 11.1, which is the grounds between the buildings including the railroad tracks, is a Category 7 due to two dieldrin detections, two out of three surface samples detected dieldrin and will be pending resolution of the dieldrin issue.

Parcel 12

GU: Parcel 12 contains RI Site 57. There are elevated concentrations of PAHs and organic compounds in the soils at the west side of the building. We determined that we need to collect additional surface soil samples because the only data that exists are from the 1990 RI Report from Law. We will collect four samples, two on the west side of the building biased toward potential waste handling or waste release areas, one on the north side of the building, and one on the south side of the building, each of those last two biased toward some kind of waste handling areas (if they exist).

GU: Parcel 12, including Parcel 12.2, Building 629, will remain as a Category 7 pending the results of air sampling, and Parcel 12.1, which is the ground surrounding it, will remain as Category 7 pending the outcome of the RI work in the area. The west end of Building 629, which is the RI Site 57, is also a potential early removal candidate pending the outcome of the soil sampling. Incidentally, the soil sampling will be done for TCL and TAL. The purpose of the surface soil sampling is again to confirm the Law environmental data. They will be taken at a depth interval consistent with previous surface soil sampling, which is the zero to 1 ft interval.

Parcel 13

GU: For Parcel 13 there were no changes to the buildings. The building is 13.4 and is Category 2. For parcel 13.5 there is dieldrin detection in surface soil samples as well as gamma chlordane that requires further assessment. Therefore, Parcel 13.5 remains as Category 7 for further evaluation. Both security gates, Parcels 13.1 and 13.3, remain Category 1.

Parcel 14

GU: Both the buildings and the surrounding areas in this parcel remain the same CERFA Category. Parcel 14.1 remains a Category 1 while 14.2 remains a Category 7.

Parcel 15

GU: There are several screening sites in here. We'll start with Site 35 within Parcel 15. We evaluated that data and there are no detections above criteria. At Site 36, we have identified 14 samples that had lead detections. Sites 36 through 39 are grouped. It consists of the hazardous materials storage area and arsenic was detected in all 14 samples. The average

arsenic detection was at 20, which is the screening criteria. However, there were 6 arsenic values that exceeded 20. The maximum was 27.7. Because we established a value of 20 as a background criteria--the decision is to categorize that site as a Category 6 for CERFA and to remove the soil. This is being performed at this site because the arsenic exceeding the criteria is in a linear area near the fence line, and it's a small contained area. Sites 36, 37, 38, and 39 apply to Subparcel 15.5. Site 55 within Parcel 15 is going to require risk evaluation in the RI due to elevated pesticide concentrations in the sediment, which is an ecological consideration in the risk assessment. Subparcel 15.3 will remain as a Category 7. Parcel 15.4 which contains Site 79 will remain as Category 1 because the site is going to be recommended for no further action and the building is being demolished anyway. Parcel 15.1 will remain a no further action site. Parcel 15.6, which includes the rest of Parcel 15 open areas, Buildings 309, 717, 416, and 417, will remain as Category 7 due to the dieldrin issue.

Parcel 16

GU: Parcel 16.1 and surrounding area remains a Category 7 because there are two dieldrin detections, and 16.2 remains a Category 7 pending the outcome of the air sampling.

Parcel 17

GU: Parcel 17.1 remains a Category 1. Parcel 17.2, the area around Building 359 remains Category 7 because of three dieldrin detections, and the Building 359, which is Parcel 17.3, remains as Category 7 pending the outcome of air sampling.

Parcel 18

GU: Parcel 18.2, which is the open area, changes from Category 7 to Category 3 because there is a BRAC sample A(18.2) that does not have any constituents exceeding criteria.

Parcel 19

GU: There were no data collected in Parcel 19. The buildings that constitute 19.2 and 19.3 are considered Category 2. The outside area, Parcel 19.1, is also considered Category 2. For subparcels 19.2 and 19.3, the Category 2 ranking is conditional on a building walk-through and an inspection to determine that hazardous materials have not been spilled.

Parcel 20

GU: Parcel 20.5 will remain as Category 7 because of elevated PAHs and toluene. The area around BRAC sample location A(20.6) is a potential candidate for an early removal action.

Parcels 25.1 and 25.2

GU: This is the summary for Parcels 25.1 (Building 873) and 25.2 (which is the remainder of Parcel 25). The determination has been made that Building 873 will be changed to a CERFA Category 4 because of a documented release inside the building, which has been

documented to have been cleaned up. For the remainder of Parcel 25, which includes Building 875 and the surrounding area, there are benzopyrene detections in samples SS27J and SS27I which are from the Remedial Investigation Site 27. This site will be going through a risk assessment and the RI process. Therefore, there is potential for action in the remainder of Parcel 25. Parcel 25, exclusive of Building 873, is CERFA Category 6 which includes Site 27. We discussed the association of the railroad tracks RI site with the parcel evaluation and decided that to be consistent with other RI sites, we will associate the railroad track samples with the parcel themselves.

GU: We determined that in a previous BCT meeting, three buildings were identified for air sampling: 835, 925, and 319, and these buildings were selected because they were representative of hazardous materials, food, and clothing. An action item was identified to cost out the per building air sampling price and determine with the given scope how many air samples could be procured and from that determine which buildings should have air sampling in addition to those three.

Parcel 29

GU: Site 56 requires further assessment for PAHs, DDE, DDT, and DDD in the sediments. There is also dieldrin and chromium above residential RBCs associated with one BRAC boring (A29.2). Therefore, further assessment is needed at sites in Parcel 29, so Parcel 29 is considered CERFA Category 7.

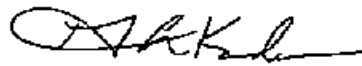
Parcel 30

GU: Building 925, as indicated earlier, will be Category 4. Additional sampling will take place in the area of 30.2 and 30.3 because of the January 19, 1988, spill. Parcels 30.2, 30.4, 30.3, and 30.5 will remain Category 7.

GU: Parcel 30.4, which is Building 949, will remain Category 7 pending the results of the air sampling in the other buildings.

GU: This is regarding Parcel 30.1, which consists of Building 925. The summary from the BCT Meeting is that there was a historical spill at the south part of the building. The spill occurred in the building, but was cleaned up. The spill was cleaned up in the building and had transported to the outside to the south of the building. The environmental baseline survey indicated that in Building 925, because of this release there was a need for additional data. Because this spill occurred in 1988, there should be no volatile materials remaining. The constituents in the spill were volatile organic compounds. The recommendation of the BCT is to categorize the site as a CERFA Category 4, and follow up with additional soil sampling in the area of the spill south of the building [Areas 30.2 and 30.3 (Area 30.3 is north of the building)]. The building was rebuilt, and the spill area formerly inside the building is now primarily outside the building to the south where it has been exposed for volatilization for approximately 9 years. Sampling will occur at Parcel 30.2.

The BRAC Clean-up Team Meeting Minutes from the September 1997 meeting are reviewed and approved for inclusion into the Administrative Record.



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