



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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January 1998 BCT Meeting Minutes

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Defense Distribution Depot Memphis, Tennessee

Meeting Minutes
BRAC Cleanup Team

January 26, 1998

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DDMT BRAC CLEANUP TEAM (BCT) MEETING MINUTES**January 26, 1998****In Attendance**

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Dorothy Richards	CEHNC	(205) 895-1463
Glenn Kaden	DDSP-FE	(901) 544-0617
Greg Underberg	CH2M HILL/ORO	(423) 483-9032
Jordan English	TDEC	(901) 368-7953
Kurt Braun	COE Mobile	(334) 690-3415
Michael Lee	DDSP-FE	(901) 544-0612
Pam Gowdy	DDSP-FE	(901) 544-0605
Phil Amido	DDSP-FD	(901) 544-0615
Ramon Torres	U.S. EPA Region IV	(404) 562-8513
Scott Bradley	CEHNC	(205) 895-1602
Shawn Phillips	DDSP-FE	(901) 544-0611
Denise Cooper	DDSP-FE	(901) 544-0610
Terry Templeton	TDEC	(901) 368-7957

Acronyms

ASAP	as soon as possible
BCP	BRAC Cleanup Plan
BCT	BRAC Cleanup Team
BRAC	Base Realignment and Closure
CEHNC	U.S. Army Corps of Engineers, Huntsville
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COE	Corps of Engineers
CWM	Chemical Warfare Material
DDC	Defense Distribution Center
DDSP	Defense Distribution Susquehanna Pennsylvania
DLA	Defense Logistics Agency
DRC	Depot Redevelopment Corporation
ECP	Environmental Condition of Property (occasional referred to as CERFA Catagory)
FOSL	Finding of Suitability to Lease
kg	kilogram

µg	microgram
mg	milligram
ng	nanogram
OE	Ordnance and Explosives
PCB	polychlorinated biphenyl
PRE	Preliminary Risk Evaluation
RAB	Restoration Advisory Board
RBC	Risk Based Criteria
TBD	to be determined
UCL95	95% Upper Confidence Limit

Meeting Minutes

Baseline Schedule

Shawn Phillips opened the meeting by discussing the baseline schedules distributed during the December BCT. Shawn has received comments from Terry Templeton. Shawn stressed that the baseline schedules were to be continuously updated and should focus on major project events. A significant change from the version of the schedules distributed in December is that the completion date of the Dunn Field Remedial Investigation, originally scheduled to be completed in December 1999, was changed to December 2000.

Shawn stated that getting the schedule out was a DLA Headquarters priority and was also identified as a need in the October partnering session. Mike Lee/DDSP-FE has taken over maintenance of the schedule and will be responsible for keeping it updated. Shawn said that the primary purpose of the schedule was to track major items and stressed not getting too involved with specific details that are likely to change.

October Meeting Minutes

Shawn proposed that if there were no changes, the October BCT Meeting Minutes were ready for signature. Shawn proposed reviewing the ECP Category for Parcel 4.11, Bldg. 253. High PAHs in one sample from this Parcel cause the BCT to propose this parcel as an early removal site. The sample is located in the area where the access corridor is planned to be installed and therefore the surrounding soil would have to be removed. Shawn stated that the soil should not be used as clean fill due to the PAHs and possibly dieldrin. If the soil is removed into a landfill, it needs to be sampled in accordance with the landfill's characterization requirements. The sample was taken below

asphalt, so the PAHs are most likely due to the ubiquitous presence of asphalt and not a release to the environment (Bldg. 253). From a broad picture perspective, this would not be an early removal candidate except for the LRA plans for the boulevard construction. Therefore, Parcel 4.11 is not a valid candidate removal site.

Jordan English said if the subsurface soil is brought to the surface, it needs to be managed accordingly. Shawn agreed, the elevated PAH soils would have to be managed with appropriate protection for workers; however, the site still did not qualify as an early removal site. Jordan asked if there was a dieldrin analysis at this location. Greg Underberg said that dieldrin was not analyzed there because the sample location was below asphalt. Jordan questioned if we need a dieldrin analysis, given what we now know about the distribution of dieldrin across the Main Installation. The group discussed this and concluded that the construction contractor needed to be aware of the likely presence of dieldrin, but that it would be managed through the use of correct personal protection equipment and waste characterization sampling during a removal action.

Shawn proposed that Parcel 4.11 be changed from the ECP Category 6 proposed by the BCT in September to a Category 7, indicating that additional evaluation was necessary. The site would go through the CERCLA process as a Screening Site, not an Early Removal. Greg suggested that we handle this site similarly to other parcels with screening sites; a memo would be written to the tenant indicating that additional evaluation of the soil is necessary under CERCLA. Ramon asked for some additional time to evaluate the Parcel data. It was agreed that all three of the parties would evaluate the Parcel 4.11 data and revisit why the Parcel was categorized as a ECP Category 6. This evaluation is to be completed by January 30, 1998.

Jordan requested that the meeting minutes be available earlier so that they can be approved while the meeting is still fresh in everyone's mind. Jordan did not think the minutes had to be as voluminous as the past few months had been. Jordan said that the only error he found in the October BCT Minutes was that he was not included in the sign up sheet. Shawn requested that EPA and TDEC review the October BCT Minutes and provide comments within two weeks. Ramon said that he would have the October and December comments within two weeks (February 9).

CH2M HILL will contact EPA and TDEC the week of February 1 to consolidate meeting minute comments.

Jordan reiterated that the meeting minutes should be shorter. Shawn said that the past few BCT meetings were unique in that a lot of ECP material was reviewed and detailed minutes were necessary to capture all the discussions. Now that the meetings are back to the original one-day format, shorter minutes could be provided. Ramon said that the minutes should be shorter; and that they would provide a record of what was concluded. Ramon said that it was EPA Region IV policy not to attend meetings that were taped. Jordan suggested adopting the Navy's policy of using a designated contractor to take notes. Ramon agreed that Frontline could provide this service. Terry suggested writing the summary realtime and have it approved during the meeting. Glenn Kaden was concerned that this would provide only a summary, and we would lose the decision making detail. Glenn was also concerned about the cost. Greg said that the current practice, requiring him to review the meeting minutes that a CH2M HILL staff typist prepares from the tapes, is also expensive. Greg suggested that the practice of starting the tape only to capture what was said in summary fashion was cost effective because it was more condensed and easier to transcribe. This is the practice the BCT currently utilizes. Shawn said that the summary tape was a good way to stop the meeting and get everyone to summarize what was said. Phil Amido said that this is sufficient, and attendees' individual notes could be attached as backup. The group discussed rotating the responsibility for the meeting minutes and concluded not to do that since the services of the individual taking the notes is lost.

Glenn said that CH2M HILL should continue preparing the meeting minutes until March, when a Frontline staff member would be available to take the meeting minutes. Frontline would also track the disposition of action items.

Comments on the December meeting minutes were due by close of business on February 9, 1998.

Review of December Action Items

Disposition of the December action items is summarized in the following table.

Item	Description (Responsible Party)	Action
1	Review Master Schedule and provide comment (EPA, TDEC, DDSP-FE)	Comments have been received by TDEC

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Item	Description (Responsible Party)	Action
2	Distribute errata sheet with schedule to include OHM schedule omission (CH2M HILL).	The OHM schedules were provided to Mike Lee for inclusion in the project baseline schedules.
3	Provide a submittal register to the BCT regarding documents produced during the GW IRA construction (DDPS).	DDMT is providing the information to the regulators as it becomes available.
4	Check EBS, 1996 BCP, and BCT minutes and correct Parcel 24.1 error (DDSP-FE).	Parcel 24.1 ECP categorization needs to be corrected. The ECP table and map correctly show Parcel 24.1 as ECP Category 5. The October BCT minutes indicate a Category 7 and need to be corrected.
5	EPA to provide comments on the CWM Workplan (EPA).	CWM comments have been received by Parsons from EPA. The non-intrusive work is scheduled to start this week.
6	Clear up uncertainty about the CWM investigation at Dunn Field regarding well installation and potential use of Geoprobe sampling (CEHNC/Parsons).	CEHNC determined that the wells had to be below the potential CWM source term to evaluate if a release had occurred. Geoprobe sampling was not proposed due to the depth to water and the repeatability requirements of the sampling.
7	Notify public of CWM activities (DLA/Frontline).	Public notified in January RAB.
8	Clean up contaminated materials in the Bldg. 251 sump (DLA).	The action was taken and photo-documentation produced and reviewed by the BCT
9	TDEC toxicological review of Dieldrin Technical Memorandum (TDEC).	Tabled for February BCT discussion.
10	Obtain information on non-government golf courses (DDSP).	The LRA has provided DDMT a POC from the Memphis Parks Commission. Tabled for February BCT discussion.
11	Award delivery order to perform risk evaluation of dieldrin at golf course	CEHNC issued modification to Task Order 3 to perform EE/CA at the golf course.

Item	Description (Responsible Party)	Action
	(CEHNC).	CH2M HILL currently responding
12	Award construction contract for the housing area soil removal (COE Mobile).	Tabled for February BCT discussion.
13	Collect additional dieldrin samples at Golf Course and Playground areas (CH2M HILL).	Action completed.
14	Provide DDSP comment responses on the Draft Background Report (CH2M HILL).	Comments were received.
15	Update BCP map with air data (DDSP).	Completed. An updated BCP abstract will be completed and disseminated in the March BCT. Approval is necessary before the April BCP update.
16	Provide a model ECP letter to DDC (EPA).	Not Completed.

Housing Area Early Removal Action

Shawn discussed the removal and sampling plan within three areas surrounding the residential housing. Within the area adjoining the residences (mapped as Area A), the first 6 inches of soil will be removed. The underlying soil will be sampled and if necessary, additional 6 inches of soil will be removed. In the areas not adjoining the residences (mapped as Areas B and C), the procedure will be similar except that the surface soil will be sampled first to determine if the initial 6 inch lift of soil needs to be removed. Sampling and analysis for a wide range of constituents will be performed on the remaining soil prior to backfilling.

Kurt Braun stated that the removal action would be performed as a lump sum project. Ramon Torres expressed concern that DLA provide the community a good facility. Kurt said that the design was complete, but we do not yet have the Mcaces Gold cost estimate. Greg said the cost estimate was scheduled to be completed today. Kurt indicated that COE Mobile would let the removal contract on February 17, 1998. Kurt also requested the 100% design be submitted to him on floppy disks.

Parcel ECP Category Changes

The BCT approved changing the ECP Category of Parcel 12.2 from a Category 7 to a Category 4 based on the results of the air sampling. The BCT also approved changing the language in the BRAC Cleanup Plan to include discussion of RI Site 57 in Parcel 12.1.

Removal of USTs

Kurt Braun discussed the USTs near Building 251 that are scheduled for removal. The lines between the USTs and the valve house are going to be removed. The lines between the valve house and the pump stand will be purged of gasoline. The design will take place in February, but to date there is not a specific schedule for the field work. Kurt requested that \$12,000 in unused funds from the Memphis Corps of Engineers be made available for this design work.

FOSLs

DLA is requiring a fenceline-to-fenceline FOSL ASAP. This FOSL will involve 157 Main Installation Parcels minus the ones already completed. It has not been determined if this will be accomplished in one FOSL document or specific groups of parcels. Ramon requested a priority list of FOSLs from the DRC.

Three priority FOSL were identified in the BCT Meeting: 1) Parcel 4; 2) Parcels contained within the access corridor area; and 3) the "20 Typicals" warehouse area. All FOSLs will be submitted to TDEC and EPA for their review. DDSP will provide a written response to all comments, regardless of disposition, as a matter of record. Regulatory comments and responses will be presented in the FOSL.

EPA Discussion

Ramon discussed the need to produce parcel and subparcel reports, similar to those prepared for the September BCT, summarizing findings from previous BCT Meetings. The reports would also be used to evaluate BRAC data sufficiency and a change potential in the operable unit configuration. Operable units would likely be reconfigured to match parcel group boundaries. Greg and Dorothy Richards indicated that they would discuss how to accomplish this contractually. Ramon

said that he is planning to prepare a memorandum on this activity by the next BCT meeting.

To maintain communication, Ramon also said that the DRC should be briefed by the BCT during the BCT meeting. It was agreed that a period will be scheduled in the BCT meeting to brief the DRC. Ramon stressed that the BCT should provide unified support to Glenn's interactions with the DRC.

Ramon also suggested splitting the BCT into two sessions, one before and one after the RAB meeting. The session before the RAB could be used to discuss issues that related to the RAB presentations, and the following session could be used to discuss and plan around issues that resulted from the RAB meeting. It was agreed by the BCT that this was a good idea and would be implemented.

Use of Herbicides

Glenn reported that DDSP needs to begin using herbicides throughout the facility and requested input from the BCT, considering the past problems evident with dieldrin application. The consensus of the BCT was that a licensed herbicide could be applied by staff certified in herbicide application.

February Poster Session

The BCT discussed the scope of the poster session scheduled for February 19, 1998 in the Corry Junior High School. Jordan and Ramon felt that the RAB should have some formal presence at the poster session. Glenn said that a letter should go out to the RAB members requesting their presence at the poster session; however, the discussion was tabled until the RAB members were contacted.

Notification of Field Sampling

Jordan and Terry said that improvement was needed in the timeliness of TDEC's notification prior to field sampling events at DDMT. The group discussed the amount of notification that was typically available prior to field events considering factors such as logistics, sampling staff availability, and weather. Jordan and Terry said that they wanted to be informed of the schedule if there was a possibility that the sampling would occur. They would prefer changes in schedule

rather than last minute notification. Shawn proposed that the monthly field work schedule be discussed in the Project Managers Meeting, typically the day preceding the BCT, and reported in the BCT.

Preliminary Risk Evaluation

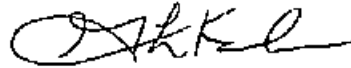
The Draft Preliminary Risk Evaluation document was submitted to EPA and TDEC for review. Comments were requested by March 27, 1998.

January Action Items List

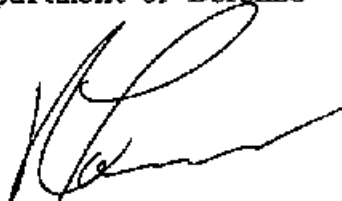
Issue #	Issue	Action	Responsible Party	Suspense Date
1	Parcel 4.11 is a priority Parcel for a FOSL. Some concern regarding elevated PAHs from soil samples below asphalt.	Review meeting minutes and Screening Site data to determine why a Environmental Condition of Property (ECP) category of 6 was proposed.	EPA, TDEC, DDSP-FE	Jan 30, 1998
2	October meeting minutes need to be approved.	Incorporate comments from EPA and TDEC into meeting minutes. Add Jordan English to attendee list. Evaluate categorization of Parcel 24.1 and confirm that BCP maps and tables are consistent with meeting minutes.	CH2M HILL gets comments from EPA, TDEC	Feb 9, 1998
3	BCT Meeting minutes need to be put out faster with appropriate level of detail.	USACHPPM and Frontline will include staff in the BCT to cover BCT Meeting minutes and track status of action items.	DDSP-FE	March BCT
4	ECP changes need to be incorporated into BCP Chapter 4 and Tables 4.6.	Draft copies of the BCP will be distributed to the BCT.	DDSP-FE	March BCT
5	Evaluate additional dieldrin sampling at golf course and playground areas	Provide maps and discussion of additional dieldrin data to DLA, EPA, TDEC.	CH2M HILL	Feb 6, 1998
6	Dieldrin Technical Memorandum requires review and, if necessary, alternative approaches and/or criteria for addressing dieldrin need to be developed.	Toxicologists from EPA, TDEC, and CH2M HILL will meet and develop dieldrin approach and criteria. Report results in Feb 19 BCT meeting.	EPA organize meeting. CH2M HILL to present to BCT.	Feb 19, 1998

7	Review December BCT meeting minutes	EPA and TDEC provide comments on December BCT meeting minutes	EPA, TDEC	Feb 19, 1998
8	Refine OU boundaries based on new data and BRAC requirements.	EPA review data and report recommendations to BCT in February.	EPA	Feb 19, 1998
9	UST Removal Schedule	Provide schedule to BCT	COE-Mobile	Feb 19, 1998
10	PRE requires review	Review Draft PRE and submit comments	DDSP, EPA, TDEC	March 23, 1998
11	Golf Course Impoundment Baseline Risk Assessment requires review	Review the Golf Course Impoundment Baseline Risk Assessment and submit comments	EPA, TDEC	Feb 24, 1998

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



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Department of Defense



RAMON TORRES
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JORDAN ENGLISH
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Tennessee Department of Environment and Conservation

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