



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 3/6

**Defense Distribution Depot Memphis, Tennessee**

**Meeting Minutes  
BRAC Cleanup Team**

**May 21 and 22, 1998**

**DRAFT**  
**BCT MARCH MEETING**  
May 21, 1998

**Agenda**

***Primary Agenda Items:***

- 8:30 Review and Sign April Meeting Minutes
- 8:40 April Action Item Review
- 9:40 COE Dunn Field Glass Vials Research Update
- 9:20 CH2M Hill PRE and ECP Category Changes
- 10:00 CH2M Hill Dunn Field IRA O & M Plan
- 10:20 COE Family Housing Workplan
- 10:40 BRAC/CERCLA Strategy
- 11:20 Underground Storage Tank Project Update
- 11:40 BCT Update for RAB
- 11:50 June RAB Meeting Agenda Topics
- 12:00 BCT Conference Discussion
- 11:00 Establish Action Item List
- 11:10 Establish June BCT Meeting Agenda

**Meeting Minutes  
BRAC Cleanup Team  
May 21-22, 1998**

**In Attendance**

<u>Name</u>	<u>Organization</u>	<u>Phone/Fax</u>
Kurt Braun	CESAM	(334) 690-3415/2327
Jordan English	TDEC/DSF	(901) 368-7953
Dann Spariosu	USEPA/Region IV	(404) 562-8552
Jack Kallal	DDSP-FE	(901) 544-0614
Pam Gowdy	DDSP-FX	(901) 544-0605
John DeBack	DoD Base Transition Field Office	(901) 544-0622
Michael Lee	DDSP-FE	(901) 544-0612
Phil Amido	DDSP-FD	(901) 544-0615
Denise Cooper	DDSP-FE	(901) 544-0610/0639
John Rollyson	COE	(931) 455-6771
Dorothy Richards	CEHNC-PM	(205) 895-1463
Scott Bradley	CEHNC	(205) 895-1637
John Lore	OHM	(305) 622-2811
Steve Offner	OHM	(770) 326-2571
Richard Isaac	USAEC	(410) 612-6823
Greg Underberg	CH2M HILL	(423) 483-9032
Jennifer Hall	Frontline	(519) 741-9011/9323
<i>Tiki Whitfield</i>	USEPA	(404) 562-8530
<i>Katrina Hamm</i>	USEPA	(404) 562-8554
<i>Carloyn Haugabook</i>	USEPA	(404) 562-8575

*Italics = in attendance of the May 22 session only*

**Status of April BCT Action Items**

Disposition of April Action Items			
Action Item	Responsible Party	Date	Status
Distribute the missing Figure 4-1 with the Golf Course Pond's Risk Assessment document	Kurt Braun/CEMDO	4/27/98	Figure was included in text.
Schedule Golf Course Pond's Risk Assessment conference call	Shawn Phillips/DDSP-FE	5/4/98	Conference call did not occur. Parties were not available. Dr. Ruth Chen/TDEC did not want to have conference call without a risk assessment to review.

Disposition of April Action Items			
Action Item	Responsible Party	Date	Status
TDEC confirm that a shock boat can be used at Lake Danielson and the Golf Course Pond and determine if TDEC's shock boat can be used at DDMT	Jordan English/TDEC	5/7/98	Jordan recommended Fish and Wildlife Service conduct shocking (see May action item list)
Continue glass vial research with Brooks Army Medical Center and the United States Army Center for Health Promotion and Preventive Medicine (USACHPPM)	Dorothy Richards	5/21/98	USACHPPM identified vials and provided documentation on type of material contained and distribution of the vials (see discussion below).
Evaluate and approve CERFA category changes based on PRE	BCT - evaluation. Greg Underberg - prepare CERFA status	5/21/98	Documentation was provided. BCT will review and discuss in June BCT Meeting.
Coordinate with TDEC UST group and attempt to expedite TDEC approval of UST removal	Jordan English/TDEC	5/21/98	Work is expedited. Mobilization scheduled for June 8 <sup>th</sup> . Removal work is scheduled to be completed in June, ahead of the July 15 <sup>th</sup> schedule.
Coordinate response to outstanding EPA comments on the Corps of Engineers Waterways Engineering Station (WES) groundwater model. WES, EPA, TDEC, DDSP-FE, CEHNC, and CH2M HILL to attend a meeting in Memphis to discuss further groundwater modeling efforts.	Dorothy Richards contact WES to discuss comments and set up Memphis meeting	5/1/98	Memphis meeting scheduled for 5/1/98 did not occur. No alternative meeting scheduled. Dorothy Richards discussed written comment responses. See the WES comment response section of these meeting minutes.
Attend partnering conference in Jackson, Tennessee	Invited attendees from BCT, DDSP-FE, Corps of Engineers, CH2M HILL, and OHM	6/1 and 6/2/98	Partnering is scheduled.
Review landfill presumptive remedy guidance	Ramon Torres	5/21/98	Not completed. Ramon was not in attendance of the May BCT meeting. Jordan provided EPA guidance to BCT for review.

Disposition of April Action Items			
Action Item	Responsible Party	Date	Status
Provide 3 <sup>rd</sup> quarter groundwater monitoring report comments	Ramon Torres	5/7/98	Comments received.
Provide response to EPA comments on the vertical profile sampling plan	Greg Underberg	5/14/98	Comments discussed in May BCT.
Dr. Ted Simon provide comments on dieldrin meeting minutes. Provide final dieldrin meeting minutes	Dr. Simon provide comments. Greg Underberg provide final meeting minutes	5/7 for comments Final meeting minutes by 5/14/98	Comments not received.
EPA provide Parcel 4 FOSL comments to TDEC	Ramon Torres	5/7/98	DDSP-FE provided on 5/21/98.
Submit invitation letter to TDEC requesting Jordan English to attend the BCT Meeting in St. Louis	John DeBack	5/1/98	Travel orders prepared by John. Jordan attended session.
Kurt Braun to provide to TDEC the draft sampling plan for the residential area soil removal	Kurt Braun	5/11/98	Field Sampling Plan submitted on May 22. Full workplan will be distributed one week later.
Prepare strawman documentation for BRAC/CERCLA strategy. Present in May BCT	CEHNC, CH2M HILL	5/21/98	Flowchart and outline of strategy provided in BCT Meeting, but not discussed. Tabled as agenda topic for June BCT.
Develop DDMT project procedure for managing and archiving objects discovered during field operations	CEHNC, CH2M HILL	TBD	Will be submitted in mid-August to early September.
Prepare response to Greater Memphis Environmental Workgroup regarding how environmental decisions were made	BCT and Terry Flynn	Before 5/22/98	Workgroup date changed. Issue still being worked.
Prepare well location memorandum justifying offsite well locations	CH2M HILL	5/8/98	Document submitted on 5/11. Will be discussed in June 1-2 partnering session.

## Action Items from May BCT Meeting

Action Items from May BCT Meeting		
Action Item	Responsible Party	Date
Respond to April Meeting Minutes in June Partnering Session	BCT	6/2/98
Schedule Golf Course Risk assessment meeting for Wednesday prior to June BCT.	CH2M HILL	6/17/98
Radian obtain cost and schedule information for fish shocking in Lake Danielson and the Golf Course Pond.	Kurt Braun	6/4/98
If Radian cannot do fish shocking, contact Robert Worthington at the State Department of Health, WES, TVA, and the U.S. Fish and Wildlife Service.	Jack Kallal - State and Fish and Wildlife Service. Dorothy Richards - WES and TVA	TBD
Discussion of detector kits found at Dunn Field during June RAB.	Dorothy Richards, Wilson Walters/CEHNC	6/18/98
Color code CERFA category change table for changes in CERFA category.	Greg Underberg	5/29/98
Review CERFA category changes and be ready to discuss during June RAB.	BCT	6/18/98
USGS review chapter 5 of the O&M Plan. Provide input on adequacy of field sampling.	Shawn Phillips provide chapter to Jack Carmichael/USGS.	5/22/98
Discuss institutional controls in June BCT.	BCT	6/18/98
Issue comments on 3 <sup>rd</sup> quarter groundwater monitoring report.	CH2M HILL	6/18/98
Evaluate legality of DoD taking lead on offsite access issues.	John DeBeck	6/18/98
Draft language for RAB participation recognition certificates.	Jennifer Hall	5/27/98
Respond to language in RAB participation recognition certificates and provide letterhead graphics to Frontline.	EPA, TDEC, DDSP-FE	6/5/98
Provide final certificates for signature in June BCT.	Jennifer Hall	6/18/98

## Meeting Minutes

### *April BRAC Cleanup Team Facilitation and Meeting Minutes Approval*

The April BRAC Cleanup Team (BCT) Meeting minutes will be approved during the June 1 and 2, 1998 partnering session in Jackson, TN.

### *June Partnering Session*

Dann Spariosu will attend the partnering session held in Jackson, TN. Dann is currently the acting

Environmental Protection Agency (EPA) representative on the BCT. Turpin Ballard, Dann's potential replacement on the BCT, may attend.

### *Dunn Field Vials*

Dorothy Richards presented information that she was provided by United States Army Center for Health Promotion and Preventive Medicine (USACHPPM) regarding the identification of the canisters, and the vials contained within them, that were discovered in Dunn Field. USACHPPM provided a document dated October 16, 1951, that included pictures of canisters and vials identical to those found in the shallow soil at Dunn Field. The objects were identified as components of an M9A2 Chemical Agent Detector Kit. The vials contained reagent chemicals that react in the presence of chemical warfare materials (CWM). The kit pumped air through the reagent chemicals, and the chemicals changed color if CWM was present. Dorothy stressed that CWM was not a component of the chemicals in the vials. Corps of Engineers Huntsville will further evaluate the chemical composition of the vials and report it in the June BCT and Restoration Advisory Board (RAB) meetings.

The kits were stored at the Depot and shipped to other locations for use in the field. There is no evidence that the kits were used at the Depot.

USACHPPM also produced a letter dated April 20, 1956, that described a shipment of 1,080 kits to the Memphis Depot. It is not certain if this is the number of kits that were disposed in Dunn Field. Another letter, dated June 1965, indicated that the M9A2 kits were obsolete and were to be replaced with new models. The Army likely would have disposed of the original M9A2 kits in Dunn Field. Parsons Environmental and the Corps of Engineers Huntsville are conducting additional records searches.

Jordan English, Tennessee Department of Environment and Conservation (TDEC), expressed concern that communication regarding the kits not confuse their function as a chemical warfare material detector with the actual presence of chemical warfare materials. Jordan and Dorothy discussed whether we were prepared to say that the kits were non-hazardous. Based on the waste characterization sampling and analysis performed by OHM, soil containing the vials is not considered a hazardous waste under the Resource Conservation and Recovery Act (RCRA) for disposal at a landfill. Documentation recently received by Dorothy indicated that the material in the kits was not hazardous; however, the BCT decided to confirm the chemical composition of the kits and present this information to the RAB in June.

### *Building 265 Drain*

The Finding of Suitability to Lease (FOSL) for Building 265 (subparcel 4.7) was issued with a Community Environmental Response Facilitation Act (CERFA) category change from 7 to 4, based on the removal of some polyaromatic hydrocarbon (PAH) contaminated materials found in a floor drain. Shawn Phillips said that the action had not yet taken place, but requested that the BCT approve the FOSL with a CERFA category 4 provided that the sediments be removed within the next two weeks. The BCT agreed to approve the FOSL as a CERFA category 4 provided the sediment was removed within two weeks.

### *WES Modeling Comments*

The U.S. Army Corps of Engineers Waterways Experiment Station (WES) produced a document describing the groundwater model and associated assumptions used in establishing the Dunn Field recovery well locations. An action item from the April BCT was to discuss outstanding United States Geological Survey (USGS), EPA and TDEC comments on the groundwater modeling document. Dorothy reviewed WES's comment responses. The BCT agreed not to require additional comment responses on the original groundwater modeling document since the wells were in place and installed. Rather, additional groundwater level data, collected from the operation of the existing 7 wells, would be used to calibrate and



verify the model. An outstanding issue was whether USGS agreed with the data collection plan outlined in the Dunn Field Groundwater Extraction System Operations and Management (O&M) Plan. EPA has an action item to obtain USGS input on the O&M plan. Jordan said that it was not necessary for USGS to review the plan, but to get their input on data they felt was needed to support modeling efforts.

#### ***Institutional Controls***

Jordan said that TDEC is moving towards active cleanup and away from institutional controls as a final remedial alternative. Jordan said that institutional controls have shown not to be effective. Jordan agreed with Shawn's statement that zoning was an effective form of institutional control. Dann said EPA can enforce institutional controls on NPL sites if institutional controls are identified in the Record of Decision for the site.

The group decided to table further discussions of institutional controls until the June BCT meeting.

#### ***Vertical Profile Sampling***

After review of the vertical profile sampling data, the BCT agreed that most of the dieldrin found at the Depot is contained within the top two inches of the soil column, corresponding to the root zone. The data will be further reviewed and discussed during the June BCT meeting.

#### ***Status of Dunn Field Interim Remedial Action and Remedial Investigation (RI) Fieldwork***

John Rollyson reported that the prove out timeframe to ensure proper operation of the Dunn Field extraction system will be discussed in the June partnering session.

Dorothy said that the RI workplan sampling addendum will be submitted for review in early August. An onboard review of the addendum is scheduled for the August BCT.

Parsons Environmental could start field work in Dunn Field in mid-July if the Memorandums of Agreement (MOA) with local hospitals were signed. The MOAs, an Army requirement when CWM is suspected, are needed to train local emergency response and hospital personnel and must be in-place before Parsons can mobilize to the field.

#### ***Review of BRAC Parcel CERFA Category Changes***

Greg Underberg presented a table of the parcel CERFA category changes based on the final Preliminary Risk Evaluation (PRE) results. The PRE compared CERFA category determinations made by the BCT (based on their review of the data) with the preliminary risk calculations. The PRE also recommended changes to parcel and subparcel CERFA categories. The BCT requested some format changes to the data summary. The BCT will evaluate the data in the June BCT meeting.

#### ***RAB Meeting Agenda and Minutes***

Tim Fields, EPA Administrator, is scheduled to attend the July RAB.

Dorothy will provide some discussion of the CWM kits during the May RAB and an update during the June RAB meeting.

#### ***Agenda Topics for the June BCT Meeting***

The following were discussed as potential topics for the June BCT Meeting:

- Landfill presumptive remedy
- Main Installation groundwater monitoring

- Update on the housing area soil removal
- Update on the underground storage tank removal
- Golf course risk assessment
- CERFA category changes
- Vertical profile sampling data
- Dunn Field groundwater extraction system Operations and Maintenance Plan
- Fish shocking
- Offsite groundwater monitoring well locations

### *Public Relations*

There was discussion between EPA, TDEC and DDSP-FE regarding preparation of a recognition certificate for individuals who have participated on the Depot RAB. The certificate will be presented by Tim Fields, with support from the BCT, during the July RAB meeting. Jennifer Hall will prepare the language for the letter and have it ready for review by June 27. Comments are due back to Ms. Hall by June 5. The final certificates will be ready for signature by the June BCT meeting. It was recommended that General Privotsky sign the certificate for the Defense Distribution Center.

EPA, TDEC and DDSP-FE will provide logos to Frontline for incorporation into the certificate.

Jordan suggested that the July RAB be held offsite since attendance is likely to be high. Other government officials, such as the county commissioner, would likely want to attend. Shawn Phillips will look for a alternate site with at least 100-person seating capacity. Denise Cooper suggested the Four Points Sheraton.

### *Agency for Toxic Substance and Disease Registry (ATSDR) Public Availability Session*

There was discussion and concern expressed about ATSDR's announcement of the public availability session which included representatives of "federal, state and local health agencies" without coordinating with TDEC or EPA of this commitment in a timely manner. Jordan proposed that Carol Meade and Dr. Ruth Chen from TDEC attend. TDEC may have a presence at the session, but not a booth. Jordan will attend with a TDEC environmental justice specialist.

It was also recommended that Carter Gray, with the City of Memphis/Shelby County Health Department, also attend.

It was recommended that TDEC, EPA and the Memphis/Shelby County Health Department jointly draft a letter to ATSDR expressing their disappointment at how the notification of the public availability session was handled. The letter should also recommend that ATSDR put together a standard operating procedure for how such notices will be administered in the future.

### *Environmental Justice Complaint*

An environmental justice complaint was filed by the Concerned Citizen's Committee (CCC) regarding EPA's oversight of the project when the detector kits were unearthed in Dunn Field. Ramon Torres of EPA had prepared a response to the Complaint Division so they could respond to the complaint. The BCT reviewed the complaint and recommended that the written response be given to the CCC documents new information regarding the nonhazardous and non-explosive nature of the material in the detector kits. Laboratory data from OHM's sampling and analysis of the soil should also be discussed, emphasizing that

the soil containing broken glass vials did not contain RCRA hazardous constituents at hazardous levels. The complaint document should also be updated with more accurate data on the population surrounding the Depot. DDPS-FE will obtain a copy of Dorothy's information and assist Tiki Whitfield prepare the response to the Complaint Division.

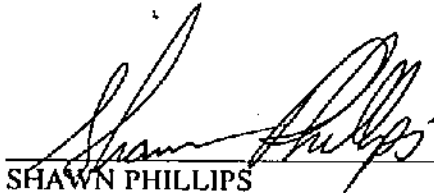
#### *Feedback from May RAB*

Jordan said that he thought the RAB had matured, as reflected in the new charter. Jordan said that the charter limits the number of times a RAB member can send a representative to three times each year. This should provide stability to the RAB.

After the May RAB, representatives from ATSDR, TDEC, EPA, and DDMT spent about half an hour addressing health concerns expressed by Ms. Delois Davis regarding health studies and her developing asthma. Shawn said that a response should have been given during the May RAB, when it was expressed, but was not. Shawn suggested that a verbal response to her concerns be given in the June BCT.

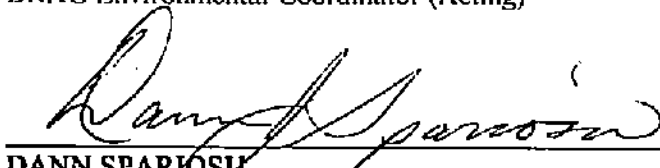
Potential June RAB topics include the following:

- Tim Field, EPA Administrator, visit to DDMT
- RAB appreciation certificates
- CCC environmental justice complaint
- ATSDR workgroup.



SHAWN PHILLIPS  
Memphis Depot Caretaker  
BRAC Environmental Coordinator (Acting)

June 19, 1998  
DATE



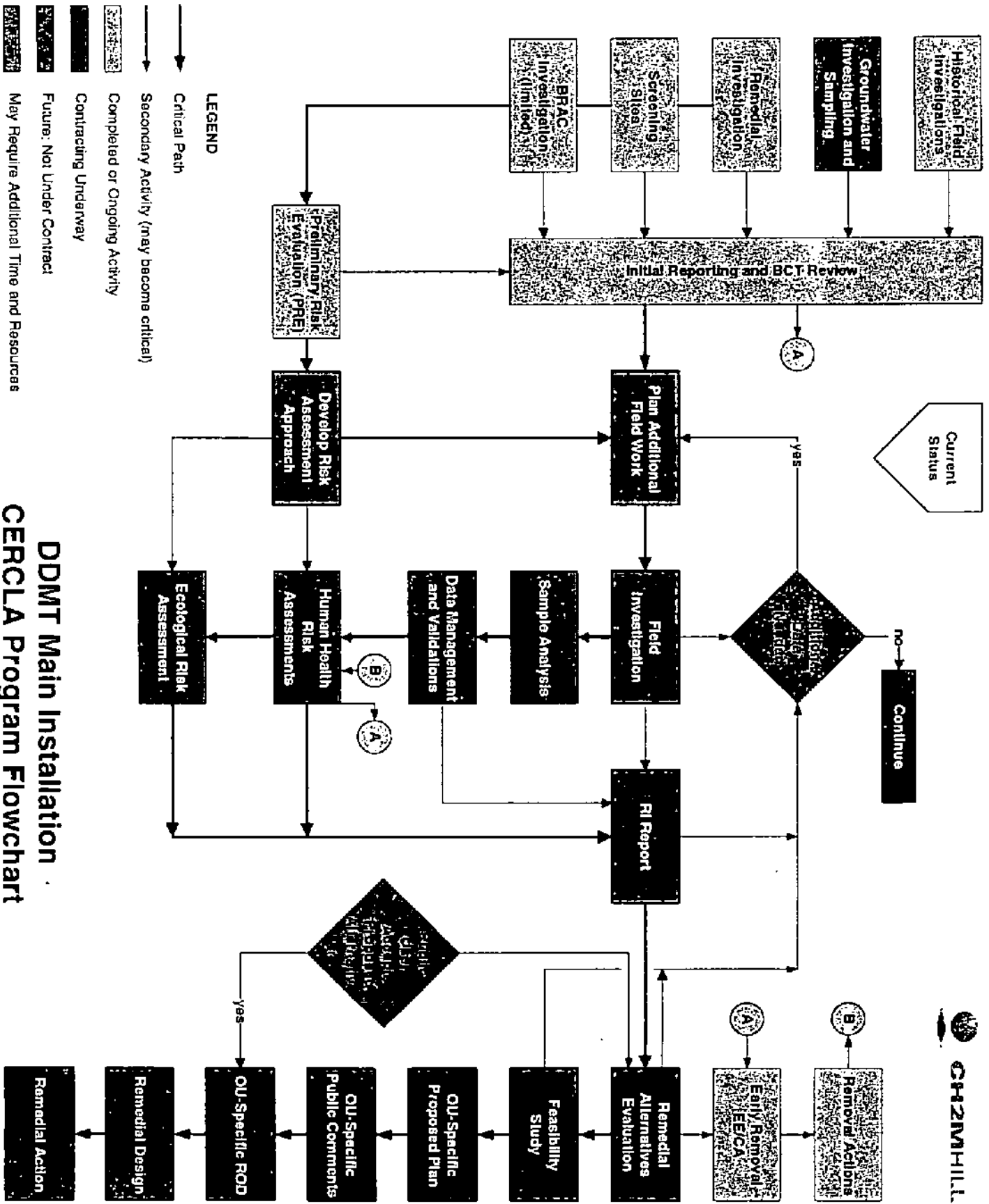
DANN SPARIOSU  
Environmental Protection Agency

6/19/98  
DATE



JORDAN ENGLISH  
Tennessee Department of Environment and Conservation

6/19/98  
DATE



DDMT Main Installation  
CERCLA Program Flowchart

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