



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

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**Defense Distribution Depot Memphis, Tennessee**

**Meeting Minutes  
BRAC Cleanup Team**

**June 18 and 19, 1998**

**BCT MEETING AGENDA**  
June 18-19, 1998

***Thursday, June 18 Items:***

- 8:30 Review and Sign April and May BCT Meeting Minutes
- 8:50 Sign RAB Certificate
- 9:00 Aerial Photography - COE presentation
- 9:30 May Action Item Review - CH2M Hill/COE
  - Test Kit Canisters
  - USGS validation of O&M Sampling Plan
  - Golf Course Impoundments Risk Assessment (fish shocking and final document)
  - Family Housing Early Removal Project
  - Cafeteria Early Removal Project
  - Sanitary Sewer Connection
  - Offsite Groundwater Well Locations (Real Estate Review)
  - Main Installation Groundwater/Direct Push
- 11:00 Institutional Controls Discussion - TDEC
- 11:15 Landfill Presumptive Remedies - TDEC
- 11:30 Vertical Profile Sampling Results - CH2M Hill
- 11:50 Evaluate and approve CERFA category changes based on PRE
- 12:20 Main Installation Remedial Investigation Update - COE
- 12:40 Establish Action Item List
- 12:50 Establish BCT Update Topics for June RAB
- 1:00 Establish July BCT Meeting Agenda

***Friday, June 19 Items***

- GIS Demonstration

**Meeting Minutes  
Base Cleanup Team  
June 18-19, 1998**

**In Attendance**

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Bruce Kasony	USATEC	(703) 428-6498
Dann Spariosu	USEPA/Region IV	(404) 562-8552
Dorothy Richards	CEHNC-PM	(205) 895-1463
Greg Underberg	CH2M HILL HILL	(423) 483-9032
Jack Kallal	DDSP-FE	(901) 544-0614
Jennifer Hall	Frontline	(519) 741-9011/9323
John DeBack	DoD Base Transition Field Office	(901) 544-0622
John Rollyson	COE	(931) 455-6771
Jordan English	TDEC/DSF	(901) 368-7953
Michael Lee	DDSP-FE	(901) 544-0612
Pam Gowdy	DDSP-FX	(901) 544-0605
Scott Bradley	CEHNC	(205) 895-1637
Shawn Phillips	DDSP-FE	(901) 544-0611
Tamar Klaff	Parsons ES	(678) 969-2492
Terry Flynn	Frontline	(888) 848-9898
Tom Beisel	CH2M HILL HILL	(770) 604-9187
Denise Cooper (19 <sup>th</sup> )	DDSP-FE	(901) 544-0610

**Status of May BCT Action Items**

Action Items from May BCT Meeting			
Action Item	Responsible Party	Date	Disposition
Respond to April Meeting Minutes in June Partnering Session	BCT	6/2/98	Completed.
Schedule Golf Course Risk assessment meeting for Wednesday prior to June BCT.	CH2M HILL HILL	6/17/98	TDEC requested meeting after review of Parcel 3 Risk Assessment TM, submitted on 6/9. Comments on TM requested by 6/30.
Radian obtain cost and schedule information for fish shocking in Lake Danielson and the Golf Course Pond.	Kurt Braun	6/4/98	Funds forwarded to TVA for TVA to perform shocking. - - Radian will collect and sample the fish.

Action Items from May BCT Meeting			
Action Item	Responsible Party	Date	Disposition
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	See above action item.
Discussion of detector kits found at Dunn Field during the June RAB.	Dorothy Richards, Wilson Walters/ CEHNC	6/18/98	Completed.
Color code CERFA category change table for changes in CERFA category.	Greg Underberg	5/29/98	Completed and submitted to BCT.
Review CERFA category changes and be ready to discuss during June RAB.	BCT	6/18/98	On agenda, but postponed until July BCT [check this]
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	Document submitted to Jack Carmichael/ USGS. Comments requested by 6/30.
Discuss institutional controls in June BCT.	BCT	6/18/98	On agenda.
Issue comments on 3 <sup>rd</sup> quarter groundwater monitoring report.	CH2M HILL	6/18/98	Comment responses provided by CH2M HILL will be reviewed by 6/30.
Evaluate legality of DoD taking lead on offsite access issues.	John DeBack	6/18/98	John DeBack reported that DoD does not have same legality as the regulators to invoke imminent domain for property access.
Draft language for RAB participation recognition letters.	Jennifer Hall	5/27/98	Completed.
Respond to language in RAB participation recognition letters and provide letterhead graphics to Frontline.	EPA, TDEC, DDSP-FE	6/5/98	Completed.
Provide final letters for signature in June BCT.	Jennifer Hall	6/18/98	Completed.

## June BCT Action Items

Action Items from June BCT Meeting		
Action Item	Responsible Party	Date
Evaluate alleged link between golfing and breast cancer	CH2M HILL	7/16/98
Provide comments on the Draft Parcel 3 Streamlined Risk Assessment	TDEC EPA	6/30/98
Provide response to comments on the Draft Parcel 3 Streamlined Risk Assessment	CH2M HILL	7/16/98
Contact TDEC/EPA regarding discrepancies in the ECP categories between the BCT Meeting Minutes and the BRAC Summary Reports. Use PRE tables to resolve.	DDSP-FE	7/10/98
Contact Jerry Jones/CESAM about obtaining 20 additional copies of the DDMT Environmental Assessment	DDSP-FE	7/7/98
Obtain comments from EPA/State regarding Chapter 5 of the Draft DDMT Dunn Field Groundwater Extraction System Operations and Maintenance Plan	DDSP-FE	6/30/98
Evaluate CH2M HILL response to TDEC and EPA comments on previous groundwater monitoring reports.	TDEC EPA	6/30/98

## Meeting Minutes

### *Previous Business*

No comments were outstanding on the April BCT Meeting minutes and they were approved. Dann Spariosu had not reviewed the May BCT Meeting minutes so they will be signed during the July BCT.

The Remedial Action Board (RAB) participation certificates were signed.

### *Dunn Field Aerial Photography*

Bruce Kasony of the U. S. Army Topographic Engineering Center (TEC) presented some of the Dunn Field aerial photographs and distributed a draft document containing photographs and the general interpretation of surficial features. The DDMT Main Installation is also undergoing evaluation. The interpretation of Dunn Field was expedited to support the Dunn Field Investigation. Mr. Kasony discussed and provided his own interpretations of numerous features observed in aerial photographs starting in 1945 and continuing through the early 1990s. Disturbed areas are generally correlated with known areas of disposal, but also extend outside of the currently mapped site boundaries.

Jordan English asked if Mr. Kasony's interpretations would be included in the final deliverable. Mr. Kasony replied that they would be included in a table format in the final report. However, many surface disturbances would likely be indicated as "unidentified." Jordan English suggested providing the RAB with some training on the scientific basis and interpretation of the images coincident or prior to discussing the photographs, currently scheduled for the October RAB. Terry Flynn suggested presenting the Main Installation photographs first since they are likely to be simpler to interpret. Greg Underberg emphasized that the photographs are a tool for preparing the field sampling plan and therefore not the only source of information that will ultimately be available for the sites. Both the Main Installation and Dunn Field photographs will be used to clarify the existing sampling plan and serve as rationale to bias additional sampling locations, if necessary.

The final report and collection of photographs for the Main Installation and Dunn Field will be submitted in late August or early September.

Copies of the draft report were provided to Parsons (1), CEHNC (2), CH2M HILL (1), EPA (1), TDEC (1), DDMT (1). Mr. Kasony will discuss incorporation of the images into a Geographic Information System (GIS) with CEHNC staff.

### ***Parcel 3 Risk Assessment***

The Parcel 3 (golf course, playground, and baseball field) Streamlined Risk Assessment Technical Memorandum was submitted on June 9<sup>th</sup>. Under a separate letter, Shawn Phillips requested comments by June 30<sup>th</sup>. Dann Spariosu left the document with Dr. Ted Simon/EPA to review. Dr. Simon said that due to his workload, he may have a contractor review it. The BCT agreed that it would be best if Dr. Simon reviewed the document due to his previous involvement with Parcel 3. Parcel 3 will be discussed in the July BCT. CH2M HILL will provide responses to comments received prior to the July BCT.

Terry Flynn suggested that CH2M HILL evaluate recent information suggesting a link between golfing and breast cancer.

### ***Status of the Housing and Cafeteria Removal and Groundwater Extraction System***

OHM will be setting up the amino assay sampling grid at the housing area during the week of June 22. Six-inch and one-foot lifts will be sampled. The samples will be analyzed in the field for total chlorinated pesticides.

During the week of June 15<sup>th</sup> OHM will submit to EPA and TDEC the workplan for the soil removal at the cafeteria for review.

Construction of the connection between the groundwater extraction system and the City of Memphis has been delayed while the city completes the design of the piping system. Jordan English said that he would encourage the City to do what they can to expedite the design.

### ***Landfill Presumptive Remedies Discussion***

Jordan English discussed TDEC's policy on landfill presumptive remedy for site remediation. The discussion was based a review of municipal landfill presumptive remedy guidance; military landfills were not reviewed. The landfill presumptive remedy applies to large areas where the volume of waste makes removal or treatment impracticable.

It is not TDEC's policy to look for hot spots in areas where they are not expected, but known hot spots need to be characterized and dealt with through treatment or capping. Mr. English said that hot spots can be consolidated, but the risks in doing so need to be characterized.

In the case of Dunn Field, it may be appropriate to group areas for application of the landfill presumptive remedy. However, Mr. English said that DDMT should look long and hard before applying the presumptive landfill remedy over a large area of Dunn Field since there may be discrete areas that could be removed. John DeBack asked if TDEC would object to consolidation of small discrete sites under a single landfill cap. Mr. English replied that he did not think that TDEC would object and that consolidation might make sense at Dunn Field. However, one concern he expressed is that if the characteristics of the removed material allowed it to be transported to a municipal landfill, disposal in a municipal landfill is an option that should be considered since the municipal landfill already has an established groundwater monitoring network in place. Mr. English also said that the public has a presumption that there is hazardous material in unknown locations in Dunn Field. Therefore, a presumptive remedy based on our information that most of the trenches contain non-hazardous materials like food waste and clothing, may not be sufficient. DDMT should look "outside of the presumptive remedy box" when evaluating Dunn Field. Shawn Phillips suggested using test pits to evaluate the contents of the landfill and confirm that the contents are non-hazardous and amenable to remaining in-place. Test pits would provide documented evidence to support the existing data characterizing what is in the trenches. Greg Underberg said that trenching in the disposal trenches raises a lot of public safety concerns related to CWM. Therefore, perimeter or angle borings may be more appropriate, if the dimensions of the trenches are adequately characterized. Jordan English said that TDEC would have no problem with the traditional boring characterization approach. Dann Spariosu said that he did not want to see an assumed landfill presumptive remedy at Dunn Field due to the groundwater contamination. Jordan English expressed a concern over unknown, undocumented materials that may be in Dunn Field. He said that the presence of the detector kits in areas where we did not expect them is an indication that the RI method of site characterization is appropriate.

Mr. English said that an outcome of application of the presumptive remedy is that the FS process is considerably streamlined. Since the type of remediation is assumed, not all of the alternatives have to be fully evaluated. The situation at Dunn Field is unique because we do not know with certainty that other materials are not buried in presumed non-hazardous sites, such as the food disposal pits. Mr. English said that there should be some process in-place to confirm the type of material presumed to be buried in the pits. Scott Bradley said that could open up a large effort to characterize areas where there is no indication that disposal of hazardous substances occurred. Mr. Bradley said that at some point we need to rely on the data at-hand otherwise all the soil in Dunn Field could be turned over. Mr. English replied that additional characterization may be needed because of the public perception that hazardous materials may be disposed in places where there was no documentation of their disposal. Mr. Bradley said that the public's concerns will certainly be addressed, but the public does not direct the program; specifically, the public's concern should not override hard evidence. If there is hard evidence of hazardous waste disposal in areas where it was presumed not to be, this would certainly be investigated. John DeBack expressed concerns that materials (the test kits) were found in areas where they were not expected and that burial occurred in areas other than documented. Scott Bradley said that



the kits were typical of refuse that would be found on any military installation and did not necessarily signify hazardous waste disposal. Shawn Phillips pointed out that the kits were located near a known solid waste disposal site (Site 10). Jordan again said that the public's perception is that DDMT found materials where they did not expect it. Scott Bradley replied that he would expect spent detector kits to be included in a solid waste landfill and that their discovery was not entirely unexpected. Jordan English asked if it is possible that there is CWM material in Dunn Field at unsuspected locations. Scott Bradley and Dorothy Richards replied that they could not disprove its location anywhere. Mr. English said that we should not forget that and take reasonable precautions to identify it.

Jordan English asked if Parsons was going to look for CWM everywhere in Dunn Field. Scott Bradley said that they were looking for it with geophysics and borings in areas where it was suspected. Mr. English pointed out that during the RI investigation, it may be appropriate to look for CWM components in a portion of the sample locations to evaluate its presence in areas outside of the suspected locations. Shawn Phillips said that we would have to be frugal in the number of samples run for CWM constituents due to the high cost of the analyses.

Shawn Phillips said that Steve Dunn with the CEHNC told him that the EE/CA at Dunn Field will recommend a removal action for CWM. A removal action is defined as removing the threat, which does not necessarily mean digging up and removing the material. A risk assessment will be performed for the chemical warfare constituents and may indicate that no further action is required; however, CEHNC/OE is intending that a removal action be performed to reduce potential liability to the government that may be incurred during transfer of the property. Jordan English pointed out that if the removal is based on a policy decision and not risk, that should be made explicit in the EE/CA so the public is not misled that there is a health risk from the CWM.

Shawn Phillips closed the discussion by stating that the CWM issues in Dunn Field will be discussed again when the Dunn Field RI Sampling Plan Addendum is submitted.

### *Institutional Controls*

Jordan English lead a discussion on TDEC's policy regarding institutional controls. The discussion was based on TDEC's policy and three documents: 1) *A Guide to Establishing Institutional Controls at Closing Military Installations* (Department of Defense), 2) *EPA Region IV Policy Assuring Land Use Controls at Federal Facilities* (EPA Region IV; to Wayne Scharber from John Johnston), and 3) a slide presentation given to the TDEC Division of Superfund during a recent retreat. A critical element identified in the EPA document is that it is not known who will enforce or pay for institutional controls. EPA's experience in this region and other places is that land use controls have not been adequately coordinated. EPA believes that federal facilities invoking institutional controls should develop an active program for maintaining them.

Mr. English said that TDEC's position in regards to the Oak Ridge Reservation is that TDEC will not accept institutional controls as a solution unless there is funding associated with the action that is intended to go to the State of Tennessee. The State would have the option to use those dollars to actively go in and remediate the site, if this were the best use of the institutional control budget associated with the site. TDEC's position is that the cost of maintaining institutional controls, for a period of time far exceeding the 30 years

normally associated with assessments, is excessive and it is cheaper to remediate the problem now. However, the State will probably accept industrial land use as a form of institutional control provided there is a mechanism in place to enforce the control.

Mr. English said that a primary problem with the State's enforcement of institutional controls is that the routine oversight of many sites is not accomplished because the State's resources are focused on sites with the most acute problems.

Institutional controls are not specifically identified in CERCLA, but are often proposed as a remedial alternative. CERCLA's requirement for a 5-year review is a form of institutional control. However, Mr. English said that significant changes involving institutional controls can take place in a five year period. A continuous enforcement program like that proposed by EPA would be preferable.

Mr. English read the section of the National Contingency Plan (NCP) that states, "...methods and criteria for determining the appropriate extent, removal, remedy, and other measure and means for ensuring remedial actions are cost effective over the period of potential exposure." Mr. English said that the State's position is that the costs of institutional controls over a long (potentially infinite) period of potential exposure can render institutional controls a cost ineffective solution. Again citing the NCP, the State would prefer to use permanent solutions to the extent practicable, which generally means to the extent that it is cost effective.

Land use controls are typically invoked because they are simple and quick and also as a means to manage a risk situation until appropriate remedial technology can be developed. The State will enforce the action because it is the State's responsibility to protect the public. That protection will be paid for by the polluter; which in the case of DDMT is DoD.

The total costs of institutional controls was broken down as 1) long-term cost of maintenance, monitoring, and enforcement; 2) liability for failure; and 3) stigma on adjacent areas. There is little means to estimate the latter factor. Liability for failure should require a contingency fund. Mr. English stressed that before institutional controls are invoked, the total cost of the action needs to be identified and evaluated.

Mr. English said that a recent institutional control policy within TDEC was based on actions at DOE. The policy has not been well communicated and therefore not used at some non-DOE sites where institutional controls were established and subsequently failed.

There was some discussion about institutional controls prohibiting a fluvial aquifer production well on DDMT property. Once a Record of Decision (ROD) is in place, Mr. English said it would be enforced by the Shelby County Health Department, which has a more stringent groundwater protection policy than TDEC. Mr. English said that institutional controls prohibiting installation of groundwater wells, for example, are typically put in place by deed restrictions; however, enforcement of the deed restrictions is not always performed and may not be in-place on property adjacent to DDMT that is also impacted by groundwater contamination.

Scott Bradley asked if DoD is responsible for the State or County's potential inability to enforce the deed restrictions. John DeBack said that due to funding shortfalls in future years, some sites in need of remediation may remain "brown fields" due to lack of money.

Mr. English agreed with this statement and said that is why the State wants to get as much of the remediation budget money committed up-front as possible.

Mr. English said that in the case of Dunn Field, TDEC would not accept a solution that involved indefinite on-site storage of exhumed wastes, particularly CWM components.

Scott Bradley agreed with TDEC's position that permanent solutions are preferred, but he questioned how much money was available now to implement them. Although institutional controls may cost more in the long-term, they do not impact near-term budgets as greatly as permanent solutions. Mr. English replied that TDEC would use the annual institutional control funding, which DoD will be required to provide, to piecemeal remediation of the sites. Accordingly, TDEC will request greater annual funding than that strictly necessary to support oversight of institutional controls.

Mr. English discussed the criteria TDEC will use to evaluate institutional controls:

- State acceptance, which often gets overlooked.
- Long-term, low-level exposure potential.
- Land use opportunities that are lost if institutional controls are invoked.
- Long-term enforcement potential.
- Potential cost savings.
- Ability of the responsible party to pay.
- Enforcement and notice mechanisms in place.
- Potential for new restrictions and criteria that could invalidate institutional controls (e.g. mercury).
- Can the remedy fail?
- What is the potential for new contamination to be discovered?
- Can the land use change?

Mr. English concluded that institutional controls may be appropriate, but data needs to be collected to satisfy the evaluation criteria. He stressed that DDMT should understand the opportunity costs such as the impacts on local business. DDMT should also allocate the responsibility and clearly identify who is responsible if a problem occurs or a bill needs to be paid.

#### ***Restoration Advisory Board Meeting Debrief***

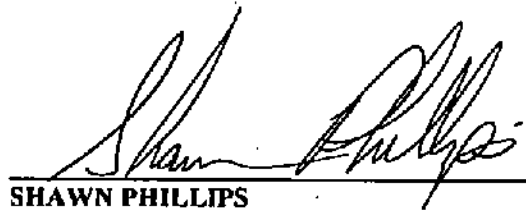
Jordan English suggested that the RAB chairmen summarize comments and discussion to prevent issues from being left unresolved. Specifically, Kenneth Bradshaw's comments regarding the environmental assessment were not addressed.

John DeBack said that Shawn Phillips and DDSP-FE should have been notified by the Corps of Engineers/Mobile regarding the distribution of the DDMT environmental assessment. DDSP-FE will contact the Corps of Engineers/Mobile about getting 20 additional copies. The RAB will be notified that only those RAB members that attended the environmental

assessment scoping session were sent copies; however, all RAB members will receive a copy. In the future, the RAB will obtain a copy of the executive summary for all submitted documents.

***GIS Presentation***

Bill Craven with the CEHNC provided a demonstration of a GIS and document management system for Worldwide Web sites that may be applicable for use at DDMT.



SHAWN PHILLIPS  
Memphis Depot Caretaker  
BRAC Environmental Coordinator (Acting)

7/16/98  
DATE



DANN SPARIOSU  
Environmental Protection Agency

7/16/98  
DATE



JORDAN ENGLISH  
Tennessee Department of Environment and Conservation

7/16/98  
DATE

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