



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 338

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**Defense Distribution Depot Memphis, Tennessee**

**Meeting Minutes  
BRAC Cleanup Team**

**July 16 and 17, 1998**

**BCT JULY MEETING**  
**July 16, 1998**

**Agenda**

***Primary Agenda Items:***

- 8:30 Review and Sign June Meeting Minutes
- 8:50 June Action Item Review
- 9:30 Soil Gas Survey - Dunn Field
- 9:50 OHM Update (Housing Removal)
- 10:10 CWM Update
- 10:30 No Further Action Document
- 12:00 Initial USGS Well-level Monitoring Results/Future USGS Involvement
- 12:20 Railroad Spurs & DRC Entrance Boulevard Project
- 12:35 BCT Update for RAB
- 12:45 RAB Agenda Topics
- 12:55 Establish Action Item List
- 1:05 Establish August BCT Meeting Agenda

**Meeting Minutes  
Base Cleanup Team  
July 16-17, 1998**

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**In Attendance**

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Dann Spariosu	USEPA/Region IV	(404) 562-8552
Dorothy Richards	CEHNC-PM	(205) 895-1463
Greg Underberg	CH2M HILL	(423) 483-9032
Jack Kallal	DDSP-FE	(901) 544-0614
Ulysses Truitt	RAB	(901) 947-2754
John DeBack	DoD Base Transition Field Office	(901) 544-0622
Phil Amido	DDSP-FE	(901) 544-0615
Jordan English	TDEC/DSF	(901) 368-7953
Michael Lee	DDSP-FE	(901) 544-0612
Pam Gowdy	DDSP-FX	(901) 544-0605
Steve Offner	OHM	(770) 326-2571
Shawn Phillips	DDSP-FE	(901) 544-0611
Ted Valentine	USCOE	(901) 948-9931
Terry Flynn	Frontline	(888) 848-9898
Tom Beisel	CH2M HILL HILL	(770) 604-9187
Denise Cooper	DDSP-FE	(901) 544-0610

**Status of June BCT Action Items**

Action Item	Responsible Party	Date	Disposition
Evaluate alleged link between golfing and breast cancer	CH2M HILL	7/16/98	Vijaya Mylavarapu will discuss with Frontline. Will be reported in August BCT.
Provide comments on the Draft Parcel 3 Streamlined Risk Assessment	TDEC EPA	6/30/98	TDEC comments received during July BCT.
Provide response to comments on the Draft Parcel 3 Streamlined Risk Assessment	CH2M HILL	7/16/98	CH2M HILL will provide response by 8/7.
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	DDMT will issue a document listing CERFA changes by 7/24 for BCT concurrence.
Contact Jerry Jones/CESAM about obtaining 20 additional copies of the DDMT Environmental Assessment	DDSP-FE	7/7/98	CESAM indicated that it will not provide the additional copies. The reports will be in the DDMT information repository.

Action Item	Responsible Party	Date	Disposition
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	CH2M HILL will respond to DDMT comments by 8/20.
Evaluate CH2M HILL response to TDEC and EPA comments on previous groundwater monitoring reports.	TDEC EPA	6/30/98	Comments from earlier reports will be incorporated into the final report to be issued after the early September sampling event.

### Action Items from July BCT Meeting

Action Item	Responsible Party	Date
Submit letter to BCT documenting proposed CERFA category changes. Discuss CERFA category changes in August BCT Meeting.	DDSP-FE	7/24 Discussion in August BCT.
Provide letter to Army Material Command requesting extension to the DDMT EA review period.	DDSP-FE	8/7
Contact Jack Carmichael/USGS to discuss water level data and other groundwater data needs.	CH2M HILL	8/7
Contact Jack Carmichael/USGS regarding attending the August 19 <sup>th</sup> Project Manager's meeting and propose discussion agenda.	EPA	8/7
Review of Area A Dieldrin Removal Workplan	TDEC	7/16 (completed)
Technical Memo of preliminary Dieldrin Soil Data	OHM	Undetermined
Present Soil Gas Results	CH2M Hill	9/17
Coordinate CH2M HILL review of ATSDR data.	CEHNC	7/31
Request DRC membership on RAB	DDSP-FE/DDSP BTC	7/31

## Meeting Minutes

### *Status of Housing Area Soil Sampling*

Steve Offner presented the preliminary results of the surface soil sampling for the pesticide dieldrin at the former base housing area, Parcel 2. The soil sampling was conducted to identify areas exceeding the 40 ppb risk-based criteria for dieldrin and thereby were candidates for soil removal. Soil sample locations were randomly selected from approximately 2,500 square foot grids within Area B, north of Bldg 176 and within the road boundary, and Area C, east of housing units, between the road and the fence. At each location samples were taken from the 0-6 inch and 6-12 inch below-land-surface intervals. Of the eight grid areas in Area B, all of the 0-6 inch intervals and four of the 6-12 inch intervals exceeded criteria. Of the 17 grid areas in Area C, 14 of the 0-6 inch intervals and six of the 6-12 inch intervals exceeded criteria.

The samples were analyzed using an immunoassay technique calibrated for detection of dieldrin. Twenty percent of the assay samples were confirmed with analysis in an analytical laboratory. The assay results were reported as either less than the criteria (< 42 ppb), greater than the criteria (> 42 ppb), or also greater than 250 ppb (42 ppb corresponded to an analytical standard and was determined to be close enough to the 40 ppb criteria that modification of the standard was not needed). The degree of correlation between the assay and analytical laboratory results was very good: 92% of the quantitative analytical results matched the three qualitative immunoassay concentration classes. There did not appear to be a spatial pattern to the soil concentrations. Mr. Offner is preparing a memorandum based on this preliminary data.

Ulysses Truitt said that the elevated dieldrin concentrations in Area B might have resulted from that area's use as a garden plot by on-base personnel.

Mr. Offner said that OHM was ready to begin the removal of Area A, surrounding the residential buildings (Area A was not sampled from 0-6 inches since it was agreed that soil in this area would be removed due to previously identified high dieldrin concentrations). OHM is currently only contracted for the 0-6 inch removal in Area A; however, the 6-12 inch interval in Area A and the Area B and C removals could be contracted within five to six days.

Jordan English stressed that he wanted to have to review only one workplan for work of this nature. Mr. English was concerned that additional phases of the residential area soil removal would require multiple workplan reviews; particularly at a time when his staff support is limited. Mr. Offner said that there would be only minor revisions to the Area A workplan for Areas B and C. Dann Spariosu said that EPA also prefers to have just one workplan or a generic workplan to review. Mr. English reviewed the workplan for the Area A removal on July 16<sup>th</sup> and provided comments to Mr. Offner.

Mr. English expressed a concern that heavy summer rains could cause runoff while the ground was exposed, particularly east of the housing units where the ground slopes. Alternatives to removal of the soil such as berming/capping or membranes in this area were discussed. Dorothy Richards expressed a concern that additional design work would be needed if the some action other than soil removal, such as capping, were taken.

Mr. English, Dr. Spariosu, Shawn Phillips, Greg Underberg, Terry Flynn, and Mr. Offner went into the field to walk over areas of runoff concern in Areas B and C. They also evaluated a dump site (that is not associated with the Depot) that was previously discussed by Mr. Truitt. It was determined that OHM would berm up the edge of the property east of the foot of the hillslope and direct potential runoff toward the sewer drain located along the fenceline. Sediment control straw bails would be installed to control suspended sediment transport into the storm drain in the event of precipitation runoff. There did not appear to be any concern that runoff from the dump site, located off DDMT property immediately to the east, could flow onto the soil east of the residential areas potentially contaminating the remediated soil.

#### ***Groundwater Extraction System Sewer Connection***

Mr. Offner is meeting with Ron Kirby, City of Memphis, to discuss the schedule for completion of the groundwater extraction system connection to the City of Memphis sewer system. OHM will be installing the connection based on the City of Memphis design. Mr. English agreed to discuss the schedule with the City of Memphis if Mr. Offner's meeting with the City was not successful in expediting the design completion.

#### ***Environmental Assessment Public Comment***

Public comments were received in the June RAB meeting requesting additional copies and review time for the DDMT Environmental Assessment (EA). The Corps of Engineers, Mobile (CESAM), author of the document, decided not to extend the public comment period nor issue additional copies. The BCT felt that this was not a good message to send to the public. John DeBack indicated the EA is for property transfer which is the responsibility of the Army Material Command (AMC), not the Corps of Engineers. Mr. English said that TDEC's National Environmental Policy Act (NEPA) Policy Office was not issued the document for review, as is required by TDEC policy. Mr. Phillips took the action to prepare a letter to the AMC requesting a schedule extension for additional public comment.

### *Dunn Field Soil Gas Sampling*

Tom Beisel presented CH2M Hill's plans for conducting a passive soil gas survey at Dunn Field. CH2M Hill was tasked to review new information at Dunn Field, primarily geophysical survey data and near-surface soil characterization data from OHM, and update the existing workplans. Organic contamination in the soil and groundwater did not correlate well with the mapped locations of the burial trenches. Geophysical anomalies were also observed outside of the known trench area. CH2M Hill proposed the use of passive soil gas detectors to evaluate the western and northwestern portions of Dunn Field for organic chemicals. Mapping of the organic contamination in surface soils will be used to locate additional surface and subsurface soil samples. In addition, Chemical Warfare Material (CWM) constituents will be monitored from soil gas locations near the suspected CWM disposal areas.

The BCT reviewed maps of the geophysical anomalies, organic contamination, and the proposed soil gas sampling grid. The BCT agreed that soil gas sampling was an appropriate screening method for additional sampling. The BCT agreed to the proposed sampling approach and soil gas sample grid.

Mr. Truitt said that solvents were sprayed on the railroad tracks north of Dunn Field and that Z-oils were sprayed along the fenceline. Mr. English suggested evaluating the fenceline along Dunn Field for organic and Z-oil constituents.

Mr. Underberg discussed the schedule change. The soil gas results will be presented in the September BCT. The Dunn Field RI Workplan addendum, based on the soil gas results, will be reviewed by the BCT during an onboard review in the October meeting.

### *Public Information Session*

Mr. Flynn said that the public information session was scheduled for Saturday, September 19<sup>th</sup>, at the Corry Jr. High School. The format of the session would be similar to the one held this spring. Mr. Truitt indicated that Saturday was not the best day for such a public function, but also said that there isn't really an ideal time. Mr. Phillips said that DDMT needs to show a good effort in reaching out to the public and so the September 19<sup>th</sup> session would be conducted. The following organizations were identified as desired participants in the session: Memphis Depot Environmental, TDEC, EPA Region IV, CEHNC, Memphis Depot Redevelopment Corporation (DRC), ATSDR, USGS, CH2M Hill, OHM, and the Concerned Citizens Committee (CCC).

### *Schedule for CWM Characterization Work at Dunn Field*

Dorothy Richards said that Parsons Environmental would be in the field on August 1<sup>st</sup>. SAIC will conduct the local emergency medical training on July 28<sup>th</sup> and 29<sup>th</sup>. The Corps of Engineers and Technical Escort Unit will be mobilized and onsite for the CWM pre-operations meeting on August 4<sup>th</sup>.



### *Presentation of USGS Water Level Recorder Data*

Dr. Spariosu presented a technical memorandum prepared by the United States Geological Survey (USGS) that summarized the data obtained from water level recorders in select Fluvial Aquifer and Lower Sand (possibly the Memphis Sand) wells. The recorders were installed to determine if the fluvial deposits are hydraulically connected to the Memphis Aquifer or lower sands near Dunn Field and to determine if there was any impact on Dunn Field monitoring wells from groundwater pumpage at the Allen Well Field.

Dr. Spariosu discussed a period around April 20<sup>th</sup>, 1998, when there was a coincident drop in water levels at a Fluvial Aquifer, Lower Sand, and Allen Wellfield pumping well that could be indicative of a hydraulic connection between the Fluvial and Lower Sand Aquifers. Mr. Underberg suggested that this could coincide with groundwater sampling activities that would have disturbed the recorders and the aquifer, but he was not sure of the specific sampling dates. CH2M Hill has the action to set up a conference call with USGS and discuss the data.

Dr. Spariosu said that USGS desires to have a more active role in the BCT and technical work at DDMT. Specifically, Dr. Spariosu wanted Jack Carmichael/USGS to be able to freely interact with OHM staff to obtain data and discuss the operation of the Dunn Field groundwater extraction system. USGS will attend the Project Managers meeting on August 19<sup>th</sup> to discuss their role in the DDMT Project.

### ***No Further Action Documentation***

Greg Underberg presented a strawman No Further Action (NFA) Record of Decision (ROD) document for Operable Unit 3 for the BCT's review. The NFA ROD is proposed as a means to obtain an NFA determination for those sites that do not require additional environmental characterization or remediation under CERCLA. Mr. Underberg reported that he discussed the requirements for NFA documentation with several other federal environmental program managers at CH2M Hill and all required public review of a ROD or any similar document. There was some discussion about the format of the document but no decisions were made in the BCT Meeting.

Mr. DeBack said that the City of Memphis would not accept property that was still on the National Priorities List (NPL). Dr. Spariosu said that EPA cannot approve the transfer land that was above contaminated groundwater. Therefore, groundwater contamination at DDMT was an issue related to obtaining NFA documentation. Mr. English said that there was some concern that if NFA candidate sites were "delisted" prior to understanding potential groundwater issues, the sites would never be evaluated for groundwater impact in the future.

Dr. Spariosu said that NPL listing historically has referred to the boundary of the facility to allow the EPA to have Federal Facilities fully evaluated and determine the real extent of contamination. Mr. DeBack said that at DDMT, the effort now should be to define the extent of contamination for each individual site rather than the entire facility.

A main point in the discussion was whether groundwater was associated with individual sites or as a separate operable unit. Currently sitewide groundwater is associated with OUI, but could be broken out separately.

The topic of NFA documentation was tabled until the August BCT Meeting. The BCT will review the strawman NFA ROD document for discussion in August. Also, CH2M Hill will prepare a memorandum indicating how the NFA assessment is achieved at other NPL sites and specifically address the groundwater issue.

### ***Review of ATSDR Information***

Mr. Phillips presented a technical memo and some data maps provided to him by John Crellin/ Agency for Toxic Substances and Disease Registry (ATSDR). A cursory review of the maps indicated some data omissions and errors. Mr. Phillips will contact Dorothy Richards and request CH2M Hill review the ATSDR maps based on their program database.

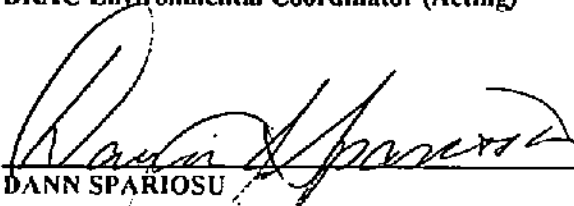
### ***DRC Involvement with RAB***

Mr. Flynn suggested that the DRC become a participating member of the Restoration Advisory Board (RAB). Mr. DeBack stated that at other facilities, the DRC is a voting member of the RAB. Mr. DeBack also indicated that if the DRC were to join the DDMT RAB, a new seat would have to be opened up through a RAB vote. The BCT took an action to discuss with DRC whether they would be interested in being on the RAB and, if so, discuss it with the RAB.



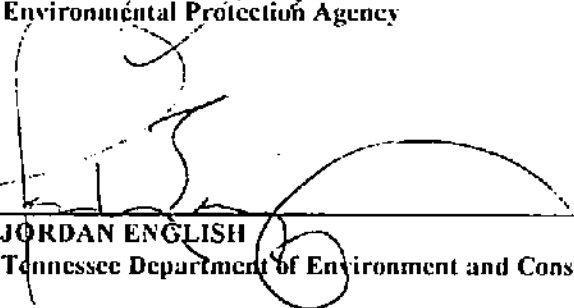
SHAWN PHILLIPS  
Memphis Depot Caretaker  
BRAC Environmental Coordinator (Acting)

8/20/98  
DATE



DANN SPARIOSU  
Environmental Protection Agency

8/20/98  
DATE



JORDAN ENGLISH  
Tennessee Department of Environment and Conservation

8/20/98  
DATE

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July 16, 1998

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