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THE MEMPHIS DEPOT
TENNESSEE

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 532

Defense Distribution Depot Memphis, Tennessee

Meeting Minutes
BRAC Cleanup Team

December 10, 1997

DDMT BRAC CLEANUP TEAM (BCT) MEETING MINUTES
December 10, 1997

In Attendance

Name	Organization	Phone
Ramon Torres	U.S. EPA Region IV	(404) 562-8513
Jordan English	TDEC	(901) 368-7953
Terry Templeton	TDEC	(901) 368-7957
Glenn Kaden	DDMT	(901) 775-4510
Shawn Phillips	DDMT	(901) 775-6372
Denise Cooper	DDMT	(901) 775-4508
Pam Gowdy	DDSP-FE	(901) 544-0605
Dana Conkin	Corps of Engineers, Arnold AFB	(901) 775-6290
Dorothy Richards	CEHNC	(205) 895-1463
Scott Bradley	CEHNC	(205) 895-1637
Greg Underberg	CH2M HILL/ORO	(423) 483-9032
Terry Flynn	Frontline Communications	(888) 848-9898

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

Meeting Minutes

Master Baseline Schedule

The master baseline schedule for DDMT was presented to the BCT for review and approval in accordance with a requirement identified during the October 1997 Partnering Conference. The schedule attempts to include sufficient time to accomplish tasks considering potential problems and delays. The schedule was presented with a blank form for recording milestone dates during the BCT meeting. The intention was to have the BCT review the schedule during the meeting and agree on program milestone dates. The schedule had not been reviewed by TDEC or EPA Region IV prior to the BCT meeting. However, after review of the schedule during the meeting it was determined that the schedule was not final for the following reasons:

- The OHM schedule for installation of the groundwater extraction system in Dunn Field was not included.

- Currently, the schedule provides 30 days for document review. The Federal Facilities Agreement allows 60 days for primary documents. The baseline schedule will be changed to reflect this.

- There was a discussion of review times for some documents that are not FFA primary or secondary documents, but were being submitted to the regulators for review. The schedule will be evaluated to determine if adequate review times are incorporated for "informational" documents. Jordan English indicated that such information was necessary in the schedule to allow TDEC to balance review workloads.

- The durations of some generic review and transmittal tasks were not adequate.

Ramon Torres questioned why a full year was required from the startup of the Dunn Field extraction system to submittal of the treatment alternative technical memorandum. Greg Underberg answered that this was to allow a full year for collection of performance-based data on contaminant concentrations and pumping rates requiring treatment. A conceptual design of the treatment alternative was performed, but based on the design assumptions it was not cost-effective to proceed with the design of the system. Groundwater will be disposed of in the City of Memphis sanitary sewer for the first year of system operation. The technical memorandum to be submitted after 1 year of system operation will determine, based on operational data, whether groundwater

treatment is cost-effective, and, if so, a treatment design will be prepared and implemented.

Shawn Phillips questioned what the review schedule would be for certain documents that were not FFA deliverables. Jordan English indicated that the schedule should be reviewed on a periodic basis, about every 6 months, to determine the review times and suspense dates for milestones.

It was determined that review of the baseline schedule by DDSP-FE, TDEC, and EPA Region IV was necessary before going final. The level of detail of the schedule is sufficient; however, errors were found that need to be corrected before issuing as final and establishing baseline schedules. Ramon Torres stated that he had not previously seen the schedules and had to review them from the perspective of the BRAC and CERCLA processes. Ramon indicated that he would have them reviewed by the next BCT meeting.

Scott Bradley stated that we should agree on durations for generic types of tasks and have CH2M HILL update the baseline schedule accordingly. Greg Underberg expressed some concern that plugging in generic task durations would produce a baseline schedule that is very long.

Glenn Kaden said that the schedule will be modified and finalized for the January BCT. The specific action item is to review the schedule for completeness, correctness, and updating. All members of the BCT will do that for the January BCT meeting. The BCT will also consider how often the schedule is to be updated. Glenn Kaden indicated that an internal review of the schedule will be performed to ensure that the task durations are correct.

Dorothy Richards questioned who would maintain the ownership of the schedule and stated that CH2M HILL is currently maintaining the schedule; however, there are a lot of tasks that are not under the control of CH2M HILL and would best be tracked by DDSP-FE. Glenn and Shawn indicated that they would prefer to have the updated schedule and control the maintenance of the schedule. DDSP-FE has the Microsoft Schedule software and has identified training for DDSP-FE staff.

CH2M HILL will add the OHM tasks to another version of the schedule and reissue it.

OHM Installation of Groundwater Extraction Wells

Ramon stated that he wanted to see the technical procedures or work plans describing how OHM will install the groundwater extraction wells. Glenn indicated that OHM was not tasked to produce specific work plans, which is an oversight that will be corrected in the future. Glenn said that the information comprising the work plan has already been submitted, but not pulled together under a "work plan" document heading. OHM is working to put together a work plan at this time. Ramon said that a technical memorandum rather than a work plan would be sufficient at this time. The requirements of the technical memorandum were discussed and all of those discussed were already included in the design documents that were submitted for regulatory approval.

Jordan English requested a listing of the technical documents that were available and that will suffice in lieu of a work plan. Glenn Kaden stated that the submittal register, included in the design documents, will be reviewed for that purpose. An action item is to identify work plan elements in the submittal register that will be submitted to EPA and TDEC. Terry Templeton indicated a need to review the well installation work plans since the work plans already submitted on the DDMT project are for groundwater monitoring wells, not large-diameter extraction wells. Shawn stated that the design and construction documents will be reviewed by the Corps of Engineers Tullahoma field office. DDSP-FE will distribute the submittal register to the EPA and TDEC by December 17, 1997. EPA and TDEC will review it and request which documents they require to review.

Approval of August and September BCT Minutes

Shawn Phillips stated that most DDSP-FE comments on the August and September meeting minutes were editorial in nature, stemming from the fact that the meeting minutes were prepared verbatim from discussion. Some discussion that was not pertinent was removed. EPA and TDEC had not received the updated meeting minutes prior to the meeting. Changes to the CERFA recategorization were not made in the DDSP-FE editing of the meeting minutes. October meeting minutes were submitted for review, but not signed.

Terry Templeton noted an error in the CERFA categorization for subparcel 24.1 (the Recoup Areas)—the CERFA map shows subparcel 24.1 is a 5, the notes show that it is a 7.

DDSP-FE, EPA Region IV, and TDEC signed the August and September meeting minutes.

Chemical Warfare Material (CWM) Characterization Work Plan

Glenn Kaden indicated some confusion over the scope of this work plan. The CWM work plan covers the scope of the CWM characterization over the entire Dunn Field area. Terry Templeton and Ramon both expressed a concern that the work plan was too lean to support this purpose. Ramon will send the work plan to his geologist and risk assessor for further review. Ramon is concerned that the risk assessment, as presented in the work plan, is vague. Ramon feels his toxicologist will require additional information, such as the kind of exposure scenario and what kind of parameters are going to be analyzed. There was some discussion about whether the work plan prepared by Parsons was to evaluate the extent of CWM contamination, particularly the purpose of the groundwater monitoring wells. It was agreed that the groundwater monitoring wells were installed close to the potential CWM sources to determine whether a release of CWM constituents to the groundwater has occurred.

Shawn stated that he thought the work plan was prepared to identify if there was need for early removal of CWM materials. Scott Bradley responded that the CWM documents are being prepared to support access to further intrusive activities in Dunn Field and to determine if additional removal or assessment actions are necessary for CWM. Shawn questioned if an RI-caliber risk assessment is necessary for those purposes. Scott and Dorothy Richards replied that for CWM, the risk assessment is simpler and is more of a hazard evaluation rather than a complete exposure determination. Ramon indicated that the work plan was also not complete in terms of what was being evaluated in the field, which is independent of the scope of the CWM risk assessment. Ramon also wanted to see procedures for construction of the wells and other type of field actions. Dorothy proposed providing some guidance on CWM investigation that might make some of these issues clearer.

Glenn was concerned that addressing the comments verbally expressed by EPA, particularly those from the toxicologist relative to the risk assessment, will slow down the field effort. The public has been told that the CWM fieldwork will start in January 1998. Scott Bradley stated that potential comments from the risk assessor should not impact the fieldwork, unless we wanted that portion of the work plan approved before the fieldwork starts. Shawn questioned whether the CWM work plan authors historically did a good job of evaluating Data Quality Objectives (DQOs) and thereby have good confidence that the data collected is sufficient for CWM characterization and risk assessment purposes. No one at the meeting could answer the question. Ramon

stated that being in the field in January would not accelerate the schedule if EPA cannot approve the upcoming CWM EE/CA report. EPA could also impact the schedule by requiring additional field data collection. EPA wants to review the work plans also to ensure that the best available technology is being used (i.e., EM61 rather then EM31).

Shawn will provide a copy of the TDEC comments on the CWM work plan for the CEHNC's response. EPA felt that they could provide comments on the CWM work plan, including resolution by CEHNC, in time to start the fieldwork by January 31.

Terry Templeton stated that the geophysical investigation is necessary to identify potential sources at Dunn Field that would be further evaluated during the RI. Terry questioned if the monitoring wells were to be installed to determine if there was migration of CWM constituents away from the source areas. Scott Bradley stated that the monitoring wells were in place to determine if there was a release from the CWM sources. Shawn indicated that based on discussions with Parson's staff, the monitoring wells were to be in place directly beneath the potential CWM source terms to determine if a CWM constituent release had occurred. If it had, then special care would be taken at the source areas during the RI to avoid interaction with CWM materials. Jordan English requested information on the DQO process that identified the need for the wells. Ramon Torres suggested using geoprobes to determine if groundwater was impacted by CWM constituents. Greg Underberg indicated that the depth to groundwater at Dunn Field is marginal for use of a geoprobe.

Ramon Torres said that review comments on the CWM work plan would be provided by January 12. Shawn Phillips requested that either OE or Parsons would explain why monitoring wells were needed. It was also desired to determine why Hydropunch. sampling was not performed. OE is to provide this information by December 20.

Denise Cooper suggested additional community involvement and communication due to the sensitive nature of the CWM investigation. Scott Bradley said that the CEHNC will comment in the CWM removal work plan and address concerns about public safety and potential removal of CWM materials. Issues such as vapor monitoring will be discussed.

Terry Flynn suggested that since the CWM field effort is likely to be pushed back into late January, a presentation should be made in the January 15 RAB meeting that discusses (1) the safety issues with CWM, (2) what the public is likely to see when the fieldwork occurs, and (3)

what is expected to be found. The RAB meeting would be followed up with a flyer to the community and door-to-door discussion with people in the areas surrounding Dunn Field. Dorothy Richards was not in a position to volunteer Parsons, but indicated that they should be involved with the presentation.

Focus groups conducted by Terry Flynn in the community surrounding DDMT identified skepticism by the community regarding what they are being told about DDMT. The community has the perception that there is a great amount of CWM in Dunn Field and that if it is encountered, the people removing it will leave and the community will be exposed. Terry Flynn suggested that we inform the community through door-to-door visits, and present the field effort at the January RAB. It was also suggested that the media become involved early in the process. Glenn communicated that in August, Chuck Twing/CEHNC indicated that the public relations issues were going to be handled prior to starting fieldwork.

Terry Templeton suggested providing one of the small CWM vials to the media for filming to show that we are investigating a very small amount of material.

It was discussed that OHM is not comfortable with the determination that there is no CWM within the area to be drilled during installation of the groundwater extraction wells. OHM is increasing their level of detection since they are not comfortable with the CEHNC's determination that there is no CWM hazard in this area. Scott Bradley indicates that this issue is one of liability; if the CEHNC's CWM organization states that this area is clear and OHM is not comfortable with this, then it is contingent on OHM to provide the additional protection at their own cost. Glenn Kaden said that he was not sure if OHM was concerned about the entire site or just one portion of it. Ramon said that the health and safety concerns of the contractor should be respected, but the main focus of the discussion is whether we are going to have two events in January requiring public presentation. Ramon said that it is the depot that should take action on the public relations and public education regarding the CWM activities at Dunn Field.

Parcel 4—Building 251

Glenn Kaden said that the highest priority for early removal are the housing area in Parcel 2, and Parcel 4—specifically Building 251. Shawn said that Building 251 was not on the early removal priority list. DDMT inspected Building 251 in response to EBS and BCT comments that there was a floor sump and waste oil tank. Concrete pads were

located on the floor in the area where the small pit (sump) was located. The pit has been grouted up to the surface. CH2M HILL did take one BRAC sample in the building, but the sample was taken from a floor drain in a boiler room on the other end of the building. The sampling results showed PAHs between residential and industrial RBCs and lead over 400 mg/kg. This sump is not a CERCLA site or early removal candidate; it is simply a 12 inch by 14 inch, 24 inch deep floor drain with some sediment. Shawn proposed that DDMT remove the sediment as a maintenance issue, or alternatively grout it up, and the BCT subsequently release the building for use. The appropriate CERFA categorization was discussed—Was this sump considered a release? Ramon suggested changing the category to yellow (CERFA Category 5) indicating that a release has occurred, but the appropriate action is under way and not complete. Shawn said that the removal action would be taken before the next BCT meeting, so Building 251 remains Category 5 until then. After the removal is completed, Building 251 will be changed to CERFA Category 4 in the January BCT meeting. The FOSL will be prepared as CERFA Category 4.

Ramon requested a review of the FOSLs before they are released. Ramon also requested that as a matter of good practice he be informed of all community involvement in the program.

Dieldrin Technical Memorandum Review

Ramon said the EPA Region IV agrees with what was presented in the November 14 Dieldrin Technical Memorandum (TM), but has some questions involving clarification of the document. Ramon also said that he needed to talk to Dr. Ted Simon to evaluate the risks associated with the background levels used as a basis for establishing the dieldrin criterion. Greg Underberg questioned whether EPA's approval of the Dieldrin Technical Memorandum also accepts the 500 ppb level as a criterion for remedial action. Ramon agreed that it was, but requested additional clarification. Greg Underberg asked if there were additional written comments, and Ramon answered that the general comment on additional clarification was all he had at the moment.

TDEC has not yet reviewed the Dieldrin TM. Ramon requested that TDEC provide input to the TM because dieldrin was a sensitive issue and also because the type of approach used in the Dieldrin TM will likely be used for PAHs as well. As an action item, TDEC agreed to review the Dieldrin TM by January 15, 1998. Ramon said that he wanted to treat the base housing issue separately from the rest of the Dieldrin TM scope because of its unique scope and schedule requirements.

Historical Dieldrin Data

Historical dieldrin data obtained by CH2M HILL from the USACHPPM database was presented and discussed. Problems with the USACHPPM database were also discussed. The data were anonymous and only detected dieldrin concentrations were incorporated into the database, according to Tom Harkins from USACHPPM. Greg Underberg said that exclusion of the non-detects biased the data to higher concentrations.

Scott Bradley questioned whether there was a database of risks associated with dieldrin. Greg Underberg said that that would be similar to a Record of Decision (ROD) evaluation. CH2M HILL performed a search for RODs involving dieldrin and did not identify any, as reported in the first Dieldrin TM.

Greg Underberg reviewed the dieldrin data. Statistical summaries from five populations were presented: (1) DDMT railroad tracks and open areas, (2) DDMT warehouses, (3) DDMT golf courses, (4) USACHPPM golf courses, and (5) USACHPPM pesticide/herbicide storage areas. The USACHPPM pesticide/herbicide storage areas had a much higher mean value probably due to the samples being taken right outside of the facility.

A population test was performed using an analysis of variance (ANOVA) procedure. The results indicated that there was no statistical difference between the DDMT warehouses, DDMT golf course, and USACHPPM golf course data populations. Therefore, the DDMT golf course data cannot be distinguished from the USACHPPM data set. Dieldrin concentrations at the DDMT railroad tracks and open areas are lower than those of the combined group just discussed, and the USACHPPM data set is higher. However, this analysis is uncertain due to the exclusion of the USACHPPM non-detect data. The highest USACHPPM reported concentration is 12,000 µg/kg and the 95th percent quartile is 6,000 µg/kg. The highest concentration reported at DDMT (the golf course) is 10,000 µg/kg. Therefore, the DDMT maximum data are in the upper 5 percent of the USACHPPM range.

Greg Underberg reviewed the results and recommendations presented in the November 14 Dieldrin TM prepared by CH2M HILL. Within the area of the "typical twenty" warehouses, the dieldrin concentrations are well bounded. Dieldrin was likely applied in the same manner throughout the warehouses, so additional sampling to evaluate the extent is not necessary. Variations within this area are likely and would need to be evaluated by the removal contractor as confirmation sampling. Enough

dieldrin data exists in this area to support a baseline risk assessment for the remedial investigation report.

Ramon indicated that the removal action level would have to be defined.

Terry Flynn questioned whether there were any pesticide levels available through the PGA or Canadian golf association. Terry suggested finding a way to compare DDMT data with golf course data available to the public. Shawn indicated that this was considered earlier, but it was determined at that time that there were insufficient data available. Terry Flynn pointed out that the golf course is likely to be handed over to the City of Memphis and it would be incumbent on the Park Commission of the City of Memphis to determine what data are available for comparison.

Greg Underberg questioned how a comparison of DDMT golf course dieldrin concentrations to that at other golf courses would be used when we already know that there is a risk-based problem. Shawn questioned whether the additional data collection proposed by CH2M HILL would suffice to perform a baseline risk assessment at the golf course. Greg Underberg answered that it would.

Greg Underberg relayed a discussion of dieldrin uptake studies that originated from Vijaya Mylavarapu (CH2M HILL risk assessor). The process would involve a laboratory study exposing rats to actual DDMT soil and obtaining DDMT-specific dieldrin uptake information. This study takes a matter of months rather than years. Terry Flynn responded that we should talk to local people first and evaluate site conditions before we jump to a laboratory study. Jordan English replied that he thought that was what DDMT did during the background evaluation. Greg Underberg responded that there were no golf courses available for background evaluation so there are no background data specifically from golf courses. Terry Flynn suggested that we contact golf courses and evaluate the range of pesticide data allowed or observed. Shawn Phillips responded that the golf course comparison data may not be directly applicable to the RI, but would be useful information for the BCT. Scott Bradley indicated that the risk assessment methodology should be followed for the golf courses rather than adopting a comparison of DDMT to other golf course data sets. Golf courses may have higher allowable concentration because their risk assessments allow use of more realistic exposure scenarios and pathways.

There was some discussion about removal actions at the golf course and how they might impact or be impacted by the baseline risk assessment.

Greg Underberg pointed out that even though a baseline risk assessment considers the distribution of the entire database rather than the maximum, a removal action could remove elevated concentrations from that data set, effectively lowering the concentration that a receptor would be exposed to. The case in point at the golf course is the potential removal of the 10,000 mg/kg concentration of dieldrin in surface soil.

There was some discussion about who would contact golf courses to obtain information. Shawn recommended that the contact be made from the perspective of general information gathering and not be done by a regulator (i.e., TDEC) since a regulatory inquiry might not engender cooperation.

Shawn suggested that further dieldrin evaluation take two approaches: a qualitative one involving comparison of DDMT-specific data to other comparable datasets and a quantitative one requiring additional sampling to support risk assessment. DDSP-FE took on the action to determine a point of contact from the DRC for local golf courses.

Terry Flynn suggested additional data comparisons to provide background and support to risk assessment determinations. Scott Bradley indicated that that was an appropriate strategy.

Scott Bradley suggested doing a risk assessment for the golf course separately from the facility-wide risk assessment to expedite transfer of the golf course. Greg Underberg responded that it could be done since the golf course has unique (residential) exposure pathways. CH2M HILL is not yet tasked to perform risk assessment. Scott indicated that he would work with Dorothy Richards to get something in place. Shawn pointed out that leasing can occur with the restriction that it be used as a golf course.

EPA and TDEC both verbally approved the additional sampling as outlined in the November 14 Dieldrin TM.

Parcel 2—Residential Areas—Removal Action

Ramon Torres discussed doing a time-critical removal at the residential areas. There was some discussion of public involvement in the removal action. Ramon indicated that even though a formal public comment period is not necessary under a time-critical or voluntary removal action, EPA strongly suggests some public involvement for the health of community relations. Shawn pointed out that the NCP does not have a definition for a voluntary removal; therefore, the action taken at the

residential areas will be considered a time-critical removal action under the NCP.

The specific action to be taken is for DLA to work with the Corps to design and implement the removal action. Shawn stated that he felt the areas where EPA and TDEC would be involved are the sampling scheme, the amount of soil removed (6 or 12 inches), and the action criteria. Ramon stated that taking 6 inches would be fine for risk assessment purposes.

Ramon required that the west and south boundary of the residential areas be fenced to discourage access to areas of elevated dieldrin. Shawn indicated that the fence will not keep residents, particularly children, from access to the rest of the grassy areas; however, actions such as moving play equipment inside the fence could be taken to keep children contained within the fenced area. Jordan English responded that that was a good idea.

The timing of the removal was discussed. Concern was expressed about whether the removal could be completed in time to support an April transfer of the residential areas. Glenn Kaden indicated that the Corps of Engineers Mobile District could have OHM on contract for the removal within a week of notice to proceed from DLA. DDSP-FE will provide the requirements for the removal action to Kurt Braun and Dorothy Richards.

Shawn suggested a strong effort to photo-document the field effort. Shawn suggested that CH2M HILL obtain some samples for TCLP analysis to characterize the waste as hazardous or nonhazardous and thereby significantly improve the government's cost estimate for disposal. After further discussion by Dorothy Richards and Scott Bradley, it was determined that the contract could be established to handle the extra cost of potential hazardous soil disposal as a contract option so the accuracy of the estimate was not essential. Glenn Kaden suggested that it was appropriate for the Corps of Engineers Mobile and their contractor to contact the disposal facility and determine the requirements. It was agreed that samples for TCLP analysis would not be taken prior to contracting the removal action.

Greg Underberg asked what the lateral extent of the sampling was to be. The extent of the dieldrin concentrations in surface soil has not been fully evaluated so some bounds should be set on the surface areas of the removal within the residential area.

Air Sampling Results

Greg Underberg presented the results of the ambient air sampling performed in Buildings 429, 330, 737, 835, 329, and 319. At the time of the sampling, all the buildings are empty without any activity. In general, DDT and a product of its decomposition, DDE, were detected in the air in all buildings and bays. Heptachlor was found in detectable quantities in Buildings 429 and 737, and in one bay of Building 835. Alpha- and gamma-chlordane were found in Buildings 429 and 737. Comparison of the criteria to OSHA and NIOSH limits for industrial exposure indicated that the concentrations in air were orders of magnitude below these criterion.

One area of concern was whether the concentrations would be expected to increase during operations of the buildings. The concentrations could increase during operations within the buildings, but because they are so low relative to the criteria, it is not likely to exceed them. In retrospect, it is not unlikely that pesticides were found at these low concentrations because the buildings were historically fumigated. The bottom line of the analysis is that the buildings are a safe place to work.

Based on the results of the air sampling, the buildings formerly characterized as CERFA category 7 (unevaluated) will be changed to category 3 (release has occurred in an area where storage, release, or disposal of hazardous substances has occurred, but not at concentrations requiring remedial action). After further discussion, it was determined that CERFA category 1 was more appropriate because it does not indicate that storage, release, or disposal of a hazardous material occurred in the building. Hazardous materials were not stored in these building, rather the pesticide concentrations result from routine fumigation. It was agreed by EPA and TDEC that CERFA category 1 was more appropriate.

As a result of the air sampling, the buildings listed above as well as similar buildings that were not sampled will be changed from CERFA category 7 to category 1.

Community Relations

Terry Flynn discussed the community relations program that has been developing over the past few months. Frontline's recent charter was to develop qualitative and quantitative data regarding the public's perception of DDMT. Terry presented the results of focus groups held on November 25. The objectives of the focus groups were to (1) gauge the public's awareness of DDMT environmental activities; (2) explore

and identify the most effective community communication tools; and (3) surface individual names, entities, and groups that would represent credible sources for community information. For the resident group, individuals who meet following criteria were selected randomly: (1) homeowner, (2) 25 years or older, and (3) must reside in one of the three zip codes surrounding DDMT. Members of the community leader groups were also randomly selected and consisted of a school principal, a community activist, someone from the Zelma Corporation, someone from the Shelby County government, and a number of block presidents.

Glenn Kaden asked how the random selection was accomplished. Terry indicated that for the community leader group, a random selection was made of individuals identified as having community interest. RAB members were included in each group. All of the residents' groups were African-Americans. All but one of the community leaders was African-American. Terry presented a summary of the key points as follows:

- For the most part, participants were long-term residents in the area around DDMT: the average length of residency was about 26 years.
- For years DDMT was viewed as a positive influence on the community, particularly its economic impact.
- The government's lethargic and ineffective response to community concerns is eroding the community's confidence in activities at DDMT.
- Limited and infrequent communication is further diminishing the community's confidence.

The community perceives that the incidence of cancer deaths surrounding DDMT is higher than normal. The community perceives a reduction in communication from DDMT in the last 9 months. In the absence of information, residents are unsure of who or what to believe. It is assumed that the government is silent because there is something to hide—no news is bad news. There is little confidence in government-sponsored studies. Ethnicity and demography are seen as having an influence on the government's lack of concern.

Both focus groups felt they would not receive adequate attention due to the African-American ethnicity. They suggested that if these environmental problems had occurred in a white community, it is felt that they would have been communicated and addressed by now.

Jordan English stated that he agreed with the public's perception that "no news is bad news" in that the Depot and the involved agencies have not done a good job in communicating with the public and presenting the positive news of the DDMT environmental program.

Glenn Kaden indicated that none of this feedback was unexpected. Terry stated that it is apparent there is no "outrage" in the community regarding the environmental condition; however, it is an important concern. Anger is directed toward the government for lack of action and contempt for the people in the community—governments are conducting and reviewing their own studies without community input.

On December 12, a newsletter will go out to about 3,000 neighbors. The Depot is starting a campaign to disseminate DDMT information. An advertisement is designed to increase attendance at RABs. Terry listed the following topics for the January RAB:

- Dunn Field update
- Groundwater treatment system
- Chemical Warefare Material assessment
- Community information session

Other feedback from the focus groups is that the community wants meetings held in their neighborhood; they do not feel comfortable coming to DDMT. On February 19, the first of two RABs/year will be held in the community, probably at Cory Junior High. A community relations session will be held at this RAB that provides one-on-one communication with DDMT stakeholders.

December BCT Meeting Action Items Summary Date: December 10, 1997				
Item No.	**Issue**	**Action**	**Responsible Party**	**Suspense Date**
1.	Master Schedule Completeness and Correctness	Review Draft Schedule and provide comment	EPA, TDEC, DLA	January 15, 1998
2.	OHM Schedule Omission	Distribute ERRATA Sheet w/schedule	CH2M HILL	December 19, 1997
3.	Determine Review Requirements for OHM by EPA/TDEC	Provide BCT a submittal Register	DLA	December 17, 1997
4.	Disagreement between October BCT Minutes and BCP for ECP Category on Parcel 24.1	Check EBS, 1996 BCP, and BCT Minutes and correct error.	DLA	December 31, 1997
5.	Receipt of EPA Comments-CWM Workplan	EPA to provide comments	EPA	January 12, 1998
6.	Uncertainty about CWM Wells at Dunn Field	Explain CWM Methodology	CEHNC/OE-Parson	December 20, 1997
6a.	Uncertainty about CWM Wells at Dunn Field	Explain CWM Methodology	Scott Bradley to Contact OE	
7.	Notify Public of CWM/OHM Activities	Presentation at January RAB	DLA/Frontline/OE	January 15, 1998
8.	Contaminated Sediment in Bldg. 251 Sump	Either Clean Sump or Grout, and Seal It	DLA	January 15, 1998
9.	TDEC Toxicologic Review-Dieldrin Technical Memorandum	TDEC Memphis to facilitate and provide comment, review	TDEC	January 15, 1998
10.	Dieldrin levels on Non-Government Golf Courses	Request a POC from DRC for local Golf Courses	DLA	January 15, 1998
11.	Golf Course Dieldrin	Award of DO. To perform a Stand Alone Risk Assessment	CEHNC	January 31, 1998
12.	Housing Removal	Award Removal Construction Project	Mobile	January 31, 1998
13.	Collect Additional Dieldrin Samples	Samples Collected at Golf Course/Playground	CH2M HILL	January 9, 1998
14.	Lack of Response to DDMT Comments on Background Study	Provide Contractor Responses to BCT	CH2M HILL	December 17, 1997
15.	ECP Map is Outdated	Update Map with Respect to Building Air Samples	DLA	January 15, 1998
16.	Model CERFA Letter	Provide this to DDC	EPA	January 31, 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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ADMINISTRATIVE RECORD

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