

THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 536

The Memphis Depot
Meeting Minutes
BRAC Cleanup Team

September 17 and 18, 1998

**Meeting Minutes
BRAC Cleanup Team
September 17 - 18, 1998**

In Attendance

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Turpin Ballard	USEPA/Region IV	(404) 562-8553
Dorothy Richards	CEHNC-PM	(205) 895-1463
Greg Underberg	CH2M HILL	(423) 483-9032
Chris King	CEHNC-ED-CS-G	(256) 895-1843
Ted Valentine	CESAM	(901) 948-9931
John DeBack	DoD Base Transition Field Office	(901) 544-0622
Jordan English	TDEC/DSF	(901) 368-7953
Stephen Offner	OHM Corp.	(770) 326-2571
Pam Gowdy	DDSP-FX	(901) 544-0605
John Garrison, Jr.	RAB	(901) 754-7672
Shawn Phillips	DDSP-FE	(901) 544-0611
Phil Amido	DDSP-F	(901) 544-0615
Terry Flynn	Frontline	(888) 848-9898
Tom Beisel	CH2M HILL	(770) 604-9187
Denise Cooper	DDSP-FE	(901) 544-0610

September BCT Action Items

Action Item	Responsible Party	Date
Submit groundwater images from WES for review by BCT.	CEHNC	9/28
Produce Draft H&S risk document based on corridor technical memorandum. Submit to BCT for review.	CH2M HILL	9/25
Submit Final Parcel 3 Streamlined Risk Assessment incorporating regulatory comments.	CH2M HILL	10/15
Expand Dunn Field soil gas grid and collect additional soil gas data.	CH2M HILL	10/15

Arrange for meeting between EPA, TDEC, DDSP-FE, CEHNC and CH2M HILL to discuss Golf Course risk management.	CH2M HILL	Arrange meeting between Oct. and Nov. BCT Meetings
Provide review comments on the <i>Basis for NFA Recommendations</i> document.	EPA, TDEC, DDSP-FE	10/15
Negotiate with Belz Properties and attempt to obtain permission to install monitoring well "V" on Belz property.	CEHNC	10/23

Meeting Minutes

Comments on August BCT Meeting Minutes

The meeting minutes were corrected according to the following comments:

- Jordan English said three additional staff identified for TDEC are not all assigned to the Depot oversight. One staff member would assist Jordan with the Depot oversight.
- A sentence stating that offsite wells with a perturbed groundwater surface were ¼ mile away from Dunn Field was deleted since the distance was not correct and the sentence was not needed in the context of the discussion.
- Jordan English wanted to clarify a statement made by Greg Underberg regarding an assumption to be used in the groundwater risk assessment, that groundwater flows from the Fluvial Aquifer at Dunn Field to the underlying Memphis Sand Aquifer, is an assumption, not necessarily a reality. It has not been determined that the confined sand aquifer beneath the Dunn Field Area is the Memphis Sand or a sand unit within the confining unit between the Fluvial Aquifer and the Memphis Sand. However, for fate and transport purposes it will likely be assumed that a hydrologic connection exists between the Memphis Sand and the Fluvial Aquifer in the area of the depressed clay surface.
- Jordan English requested clarification that although the Depot may have a moral responsibility to do research on exposures to workers, the Depot may not have a legal responsibility.

Bioremediation Status

Scott Bradley discussed the status of the dieldrin bioremediation study, currently in the laboratory evaluation phase. There was some discussion about starting the field pilot test now, to accelerate the evaluation process. Mr. Bradley proposed that the field pilot study not begin until Spring since the bioremediation process shuts down during winter months and there is not enough time before winter to complete the field study. The BCT agreed with Mr. Bradley that waiting for the right climate was more important than pushing the field evaluation before winter.

Main Installation Health and Safety Risk Calculations

Greg Underberg provided a preliminary draft of risk calculations for maintenance workers performing landscaping and excavation along the proposed entrance corridor on the Depot Main Installation. Mr. Underberg provided the calculations so that the BCT could review the assumptions incorporated into the landscaping and excavation scenarios. The calculations will be redone so that the dependent variable is the time allowed for exposure in each of the six Main Installation Functional Units. The draft calculations will be completed and submitted by September 25, 1998.

Discussion of Corps of Engineers Waterways Engineering Station (WES) Groundwater Model

There was discussion of the disagreement between USGS and WES regarding the application of the groundwater model at Dunn Field. USGS does not agree with some of the assumptions incorporated into the model, particularly the high rate of infiltration WES used to calibrate the model. It was agreed that since the wells are already installed, additional discussion of the model should wait until pumping system performance data is accumulated. Kurt Braun suggested that USGS and WES meet to discuss the data and any additional modeling. Turpin Ballard needs to set up some funding for USGS, which will take about two months, after which a meeting can take place.

Dunn Field Soil Gas Discussion

Tom Beisel presented the results of the first phase of passive soil gas evaluation conducted at Dunn Field. Two-hundred ninety-five soil gas collectors were installed in 50-ft grid centers covering approximately the western third of Dunn Field and along the northwest perimeter, paralleling the offsite railroad tracks. Areas of elevated tetrachloroethene, trichloroethene, dichloroethene, chloroform, and carbon tetrachloride were identified, not all of which were associated with known hazardous waste disposal areas. An area of TCE soil gas concentration was identified along the northwest portion of Dunn Field that is outside of the cluster of waste areas along the western perimeter. The passive soil gas grid did not identify the extent of all of the soil gas, particularly east of the grid.

Jordan English and Turpin Ballard both identified a need to extend the soil gas grid to the east to further evaluate the extent of soil gas and also evaluate other Dunn Field sites for potential volatile organic soil contamination. The BCT discussed using a grid with expanded (greater than 50 ft) center spacing in the unsurveyed areas of Dunn Field. Alternatively, the soil gas points could be installed in a phased approach, expanding the grid until the full extent is evaluated. Mr. Beisel will consider cost and schedule impacts and expand the soil gas grid. Mr. Beisel will also provide the soil gas data to Parsons Environmental for their use.

Groundwater Extraction Well Development

Turpin Ballard discussed with Steve Offner and Greg Underberg a technical memorandum he had previously submitted for review that identified some issues regarding groundwater extraction well development. Specifically, the memorandum indicated that extraction wells should be developed for a long period of time to remove all fine materials and should not sit idle for extended periods of time since the fines may settle and clog the formation or filter pack. Mr. Offner and Mr. Underberg said that technique was not necessary for the Dunn

Field wells since the wells were installed using the Rotasonic method that did not introduce any fine drilling mud's into the formation. The wells were developed using the surging and overpumping method. Mr. Ballard agreed that extended development was not likely necessary using this drilling method, but warned that additional development could be necessary since the wells were sitting for an extended period of time.

Project Status

Steve Offner discussed the status of the residential area soil removal. sodding is mostly completed in Area A. All of Area C will be removed to 12 inches and then sodded. Area C will be opened and covered within one day to reduce the chance of stormwater runoff.

Mr. Offner reported that a drainage pipe was found exiting the sloped area behind (east) of the residential area that carried runoff water from the grassed slope under the fence and into the adjoining apartment area. The pipe was removed during the soil excavation effort.

Mr. Offner said that the cafeteria soil removal effort will be negotiated soon. The cafeteria soil removal will be very similar to the residential area removal. OHM will amend the existing residential area sampling and analysis plan (SAP) for the additional cafeteria area removal.

The connection between the groundwater extraction system piping and the City of Memphis sewer is currently being constructed by a subcontractor. Mr. Offner said utilities present that were not identified by the Memphis Light Gas and Water (MLGW) utility clearance subcontractor caused some delay in completing the sewer connection. The connection should be completed by September 21, 1998, followed by one week of system testing, one week of performance testing, and two weeks of operations. OHM is scheduled to have completed the negotiation of the Operations and Maintenance contract in time so that the operation of the system can continue uninterrupted.

EPA Comments on Main Installation Sampling Plan Addendum

Greg Underberg provided the response to EPA comments on the Main Installation Sampling Plan Addendum. Turpin Ballard's comment on the presence of PAHs in soil associated with asphalt areas was discussed. It was determined that additional sampling to evaluate the extent of PAHs in soil would not be necessary if the soil was associated with asphalt. John DeBack said lubrication boxes on the railcars that were used at the Depot may have resulted in higher PAH concentrations at the Depot railroad tracks than are observed at other railroad tracks (such as those at Millington Naval Air Station).

Golf Course Area Record of Decision

Turpin Ballard said that the current method for addressing the early action at the golf course, an Engineering Evaluation/Cost Analysis (EE/CA), is acceptable. The BCT reviewed the draft *Parcel 3 Streamlined Risk Assessment* (CEHNC, 1998) and discussed that the maximum risk presented to golfers at the Depot (2×10^{-5}) is within the range that could be controlled with institutional controls, such as warning golfers of potential risks or limiting the number of days they play. Mr. Ballard said that the ongoing bioremediation study should be proposed as a remedial technology in the interim ROD. Under an interim ROD and while bioremediation was being evaluated, the golf course could be operated with institutional controls in place. If bioremediation is successful in lowering the dieldrin concentration below levels of concern, the final ROD would indicate that institutional

controls would be lifted. If bioremediation is not successful, a final ROD would indicate that the golf course could continue to be operated under institutional controls or, if bioremediation was partially successful, the institutional controls might be modified. The success of the bioremediation pilot test could be used as a basis for the interim ROD.

John DeBack said that the National Park Service, the agency currently interested in obtaining the Depot golf course, would not accept it until a Finding of Suitability to Transfer (FOST) had been determined.

CH2M HILL will finalize the *Parcel 3 Streamlined Risk Assessment* by the October BCT Meeting. The BCT set a schedule of having a draft interim ROD prepared by January 1, 1999. The BCT also proposed setting up a meeting between the BCT members and risk assessment support staff to discuss the type of interim institutional controls appropriate for the golf course. The meeting should be scheduled between the October and November BCT meetings. CH2M HILL will prepare a 4-6 page fact sheet prior to the meeting for review by the BCT agencies.

Basis for No Further Action Report

Greg Underberg provided an overview of the draft *Basis for No Further Action Recommendation* document. The BCT will review the document and provide comments by the October BCT.

Building 308, Part B Permitted Facility

Shawn Phillips informed the BCT that Building 308 was in the RCRA Part B permit. It is the Depot Caretaker's opinion that Building 308 was in interim Part B facility. The Depot intends to make an effort over the next 30 days to determine if there are additional RCRA regulatory requirements or if management under CERCLA alone is sufficient.

Environmental Condition of Property (ECP) Category Changes

The BCT concurred on two proposed ECP category changes. First, Subparcel 33.7, which was Building 765, was an under ground storage tank (UST) that supplied fuel to Building 770, will be moved east to the surface footprint of the actual removed underground storage tank (UST). Second, a subparcel boundary line across Subparcel 21.3 will be removed to allow all the soil between the Parcel 21 buildings to be included in the soil Subparcel 21.5.

Additional Main Installation Sampling

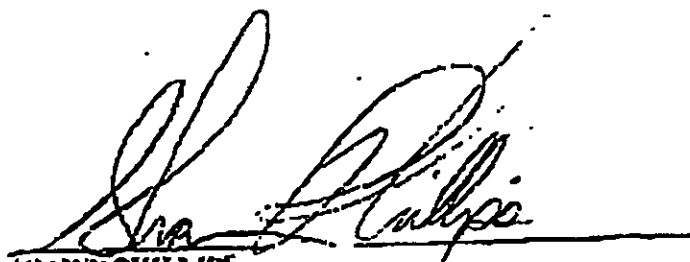
Greg Underberg discussed additional Depot Main Installation sampling that was proposed based on a review of aerial photographs recently provided by the U.S. Army Corps of Engineers Topographic Evaluation Center (TEC). The following additional sampling points were discussed and approved by the BCT.

1. A boring will be installed in the location of a pond identified in the southwest portion of the Main Installation. The pond was present in 1945 through the early 1950s. A boring will be placed through the pond and the pond sediment, if it can be identified from the boring, will be sampled. Otherwise a soil sample will be taken at a depth of 10 ft.
2. BRAC sample locations will be reviewed to determine if there are at least two BRAC samples from the abandoned pistol range located in what is now the

northern portion of the golf course. If not, then additional surface soil samples may be needed so that there are at least two surface soil samples from within the pistol range area. Lead from bullets is the potential contaminant of concern. The BCT discussed with Wilson Waters, CEHNC, whether target ammunition could present an unexploded ordnance problem. It was determined that unspent ammunition would be retained by the marksmen, so it was unlikely that large amounts of unexploded pistol cartridges would be present. No unexploded ordnance precautions are necessary.

3. The scared area along the southwestern perimeter of the Main Installation will be sampled, but the samples will not be included as extent samples from the sandblasting and painting areas.
4. Structures identified as magazines on what is currently the golf course will be sampled. A surface and subsurface soil sample will be taken from each area identified as SF2 and SG2.

Installation of proposed groundwater monitoring well "V" located west of Dunn Field on Belz property, was discussed. Turpin Ballard said that a borehole was needed at this location to assist in identifying the configuration of the depressed, or possibly absent, confining unit clay. Mr. Ballard said that it would not be necessary to sample groundwater if the groundwater sample presented an issue with Mr. Belz. Greg Underberg said that a groundwater well at this location would be important in supporting groundwater characterization within the area of thinner or absent confining unit clay. This location was identified for drilling in 1996, but Mr. Belz's attorneys required an indemnity clause that was not acceptable to the Government. CEHNC will attempt to negotiate access to Mr. Belz's property to install a groundwater monitoring well. The well will not penetrate a confining unit clay if one is encountered. Well "V" will monitor the uppermost aquifer at this location.

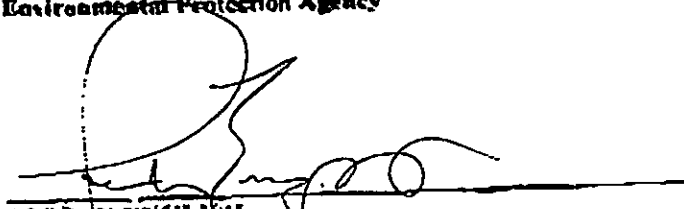
**BEST AVAILABLE
COPY**

SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator (Acting)

10/22/98
DATE


TURPIN BALLARD
Environmental Protection Agency

11/2/98
DATE


JORDAN ENGLISH
Tennessee Department of Environment and Conservation

11/5/98
DATE

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