



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 540

**The Former Memphis Depot, Tennessee**

**Meeting Minutes  
BRAC Cleanup Team**

**October 15 and 16, 1998**

**Meeting Minutes  
BRAC Cleanup Team  
October 15-16, 1998**

**In Attendance**

<u>Name</u>	<u>Organization</u>	<u>Phone</u>
Scott Bradley	CEHNC	(256) 895-1637
Dorothy Richards	CEHNC-PM	(256) 895-1463
Chris King	CEHNC	(256) 895-1843
Bill Craven	CEHNC-ED-CS-D	(256) 895-1612
Kurt Braun	CESAM	(334) 690-3415
Greg Underberg	CH2M HILL	(423) 483-9032
Denise Cooper	DDSP-FE	(901) 544-0610
Jack Kallal	DDSP-FE	(901) 544-0614
Shawn Phillips	DDSP-FE	(901) 544-0611
Alma Black Moore	Frontline	(901) 544-0613
John DeBack	DoD Base Transition Field Office	(901) 544-0622
Jennifer Hall	Frontline	(888) 848-9898
Steve Offner	OHM	(770) 326-2571
John Stein	UXB International	(703) 724-9631
Dave Bond	RAB	(901) 774-4903
Jordan English	TDEC/DSF	(901) 368-7953
Turpin Ballard	USEPA/Region IV	(404) 562-8553

**Action Items from October BCT Meeting**

Action Item	Responsible Party	Date
Results available from treatability study of bioremediation of dieldrin in soil	CEHNC	2/1
Schedule meeting to discuss Main Installation Risk Assessment.	CH2M HILL	11/2
TDEC provide comments on <i>Draft Basis for No Further Action</i> document.	TDEC	11/19
Initiate comfort letter on No Further Action Sites for BCT review	DDSP-FE	Nov/ Dec BCT
Review <i>Risk Evaluation for Workers Health and Safety</i> .	CEHNC	11/16
Complete lead based paint removal.	CESAM	11/1/98 – 1/1/99
Provide outline of web site to TDEC, EPA, and CEHNC.	DDSP-FE	12/1/98
Present data from fish sampling at Lake Danielson and the Golf Course Pond	CESAM	12/1/98
Submit final <i>Parcel 3 Streamlined Risk Assessment</i> document.	CH2M HILL	10/23

## **Meeting Minutes**

### ***Introduction and Comments on September BCT Meeting Minutes***

Shawn Phillips introduced John Stein of UXB International. Mr. Stein is the project manager for the upcoming chemical warfare material removal action at the Depot.

Turpin Ballard had significant comments on the discussion regarding the golf course Record of Decision (ROD). Mr. Ballard disagreed with the statement that risk management at the golf course could control the risks. He wanted to specify that institutional controls, a type of risk management, were suggested as appropriate but would not constitute a No Further Action (NFA) ROD until the full risk assessment of the Depot Main Installation was completed. The effectiveness of institutional controls at the golf course would not be evaluated until the baseline risk on the Depot Main Installation was determined. Likewise, the effectiveness of risk reduction that might be realized if the bioremediation pilot study is effective would need to be evaluated in the context of a Main Installation baseline risk assessment. Mr. Ballard said that an interim ROD containing institutional controls may be appropriate and would remain interim until the Main Installation risk assessment was completed. It would only be appropriate to convert the interim ROD to a final ROD if the risks associated with exposures on the Main Installation do not require modification to the interim institutional controls at the golf course. Mr. Ballard and Greg Underberg discussed changes in the text of the September BCT Meeting Minutes which were incorporated in the final September minutes.

### ***Golf Course Risk Discussion***

Scott Bradley said that samples of the Main Installation soil would be transported to Birmingham, Alabama, for a "field" study of the bioremediation's effectiveness. Construction of temporary structures at the Depot to keep the soil biologically active during the winter months was determined not to be feasible. Mr. Phillips said that there is not an immediate BRAC requirement for remediation of the golf course, but rather the cost and effectiveness of continued maintenance was becoming undesirable.

Alma Black Moore said that the Metropolitan Inter-Faith Association (MIFA), the proposed future tenants of the base housing area, were concerned about potential risks from exposures to the baseball and golf course areas that might be encountered west of the housing area fence. Jordan English concurred that future tenants should be made fully aware of the historical application and health impact of pesticides on the recreational areas adjacent to the housing area. Mr. Ballard said that we should keep in mind that the residents are using the residential areas as temporary housing and would likely not be exposed to soils for a long duration.

Ms. Moore said that the longest resident would likely be a director who would stay in the housing longer than any of the transient residents. Mr. Ballard suggested looking into this and conduct a risk calculation to demonstrate to MIFA the potential risks and their associated assumptions.

The BCT suggested taking the following actions regarding the golf course risks.

- 1 CEHNC will conduct the dieldrin treatability study for golf course soils and obtain the results by February 1, 1999.
2. The BCT will review the results in the January or February BCT meeting, depending on when they become available.
- 3 Golf course ROD documentation will be discussed in either the February or March BCT meetings, depending on the timing of the previous data review.
- 4 Public meetings on an interim ROD could occur in April.

### ***Worker Health and Safety Risk Evaluation***

Mr. Phillips passed out the technical memorandum *Risk Evaluation for Workers Health and Safety*. The document is being used as an internal guidance document to evaluate potential depot worker exposure. Mr. English suggested the BCT review the document, even though it is an internal Depot document. Mr. Phillips said that the document will be used as support for making internal decisions regarding worker actions and therefore is not a decision document. CEHNC will review the document for correctness. The Depot will implement it without direct EPA and TDEC involvement. Information copies were provided to EPA and TDEC, but they will not provide formal review comments.

### ***Dunn Field Soil Gas***

Mr. Underberg discussed the second phase of the Dunn Field soil gas survey. Two-hundred sixty GoreSorber® soil gas monitoring points were installed across the eastern portion of Dunn Field. The monitoring points will be removed no sooner than October 28. Analytical results should be available after the third week of November and will be presented to the BCT in the December BCT meeting.

Surface soil is currently being removed and graded during road construction at the National Stockpile areas. There was some discussion regarding what to do if the soil gas indicated that the soil that is now being used as fill or covered with clean soil was contaminated. The BCT determined that there would be no change in the road construction since completion of the roads is necessary to reduce dust generation. If the soil gas indicated the potential for soil to be contaminated, then additional risk assessment or characterization may be necessary. At worst case, some soil may have to be removed at a later date, but it was agreed that this is unlikely.

### ***Basis for No Further Action Document***

Mr. Phillips asked if there were any comments on the *Basis for No Further Action Document*. Mr. Ballard requested removing the Section 5 Declaration since this is not a formal decision document. EPA concurred with the basis for no further action for the 12 proposed sites. TDEC will review the document and provide comments by November 19. Mr. Phillips will prepare a comfort letter following EPA Brownfield guidelines for EPA and TDEC to review.

### ***Soil Removal at Cafeteria (Building 274)***

Steve Offner/OHM presented an overview of the soil removal operations proposed for the cafeteria area. The soil is being removed due to the presence of PCBs from PCB-containing materials once stored at this site. Previous soil samples in grass areas adjacent to Building 274 indicated PCB (Aroclor-1260) concentrations ranging from 0.0259 mg/kg to 1.39 mg/kg. Surface soil (0-12 inches below land surface) will be removed to a PCB concentration of 0.74 mg/kg. Seven hundred seventy cubic yards of soil will be removed and no soil will be removed below 12 inches. Confirmation samples will be collected (a 4 point composite sample for every 5,000 ft<sup>2</sup> removed soil) below the removed soil and analyzed for TCL volatile organic compounds, semivolatile organic compounds, pesticides, PCBs, TAL metals and cyanide.

The site will be restored using clean imported backfill/top soil and grass seed and mulch. Backfill soil will be sampled prior to use at the site. Stormwater and erosion controls will be established using liners, berms, silt fence and haybales.

There was some discussion about the need for confirmation sampling below the removed surface soil. PCBs will be dropped from the confirmation samples since, as the primary contaminant of concern at the cafeteria, they are being analyzed in the removed surface soil. Otherwise, the BCT decided to complete the confirmation sampling as proposed. The BCT conferred to proceed with the removal per the requirements written in the removal plan and presented by Mr. Offner. The cafeteria removal is scheduled to start on October 16 and be completed by the end of October.

#### ***Family Housing Soil and Lead-Based Paint Removal***

Soil excavation, backfilling, and sod replacing has been completed. Two hundred forty tons of soil was removed in 270 truckloads. The only actions remaining are to retrofit drainage's and some housekeeping actions.

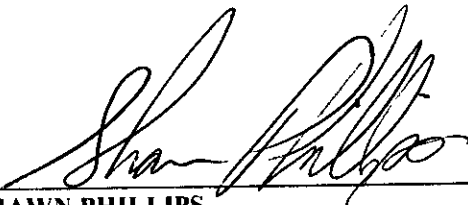
OHM has pre-qualified three subcontractors to complete the lead-based paint removal. OHM will not put vegetation (predominantly shrubs) in areas where lead-based paint removal will occur. Lead-based paint removal is scheduled to start on November 1, 1998 and conclude on January 1, 1999.

#### ***Dunn Field Groundwater Extraction System***


The connection with the City of Memphis sewer system is complete. The City had some concern that the existing manhole would not be able to handle the anticipated pumpage. However, there have been no capacity problems with the current start-up of the system. The system is now running at close to the design capacity. Minor modifications and adjustments to the system will proceed for the next two weeks.

#### ***Web-based Electronic Data Management System Presentation***

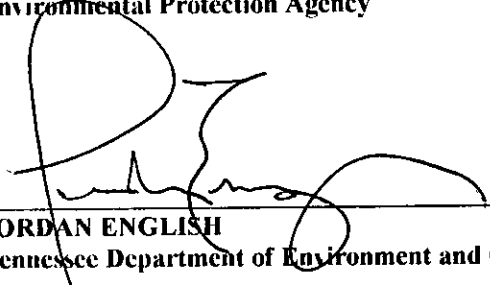
Bill Craven/CEHNC presented the web-based Electronic Data Management System (EDMS) proposed for use at the Memphis Depot. CEHNC is proceeding with awarding a contract to implement the system for the Depot. The system will not interfere with the Depot web site currently under development, but will exist as a HTML link on the web site. Mr. Phillips will provide TDEC, EPA, and CEHNC an outline of the web site under development.

 - OCT BCT  
MINUTES. 1/21/99  
DATE

SHAWN PHILLIPS  
Memphis Depot Caretaker  
BRAC Environmental Coordinator (Acting)

 1/21/99  
DATE

TURPIN BALLARD  
Environmental Protection Agency

 1/21/99  
DATE

JORDAN ENGLISH  
Tennessee Department of Environment and Conservation

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