



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 545

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545

BRAC Cleanup Team
January Meeting Minutes
January 21-22, 1999

Attendees

Name	Organization	Phone
Greg Underberg	CH2M Hill	(423) 483-9032
Tom Beisel	CH2M Hill	(770) 604-9182
Doris Bradshaw	DDMTCCC and RAB Member	(901) 942-0329
Shawn Phillips	DDSP-F	(901) 544-0611
Brian Deeken	TDEC-DSF	(901) 368-7955
Jordan English	TDEC-DSF	(901) 368-7953
Turpin Ballard	EPA Region IV	(404) 562-8553
Alma Black Moore	Frontline	(901) 544-0613
Denise K. Cooper	DDSP-F	(901) 544-0610
Stephen Offner	OHM/IT Corp	(770) 326-2571
Chris King	CEHNC	(256) 895-1843
Dorothy Richards	CEHNC PM-ED	(256) 895-1463
Terry Flynn	Frontline	(888) 848-9898
Kurt Braun	CESAM	(334) 690-3415
Dr. John Crellin	ATSDR	(404) 639-0635

Review of Previous Meeting Minutes

October meeting minutes were discussed, approved and signed. November-December meeting minutes were discussed, approved and signed.

January Action Items

Action Item	Responsible Party	Date
Modify "comfort letter" regarding status of proposed no further action sites and provide to DRC.	DDSP-F	2/26/99
Provide comments on draft Basis for No Further Action document.	TDEC	2/18/99
Provide written comments on draft final Community Relations Plan	TDEC	1/29/99

Submit draft RI Report (RA and text outline) for one functional unit directly to DDSP-F, EPA and TDEC.	CEHNC/CH2M Hill	2/9/99
Prepare cover letter for draft RI Report for one functional area and provide to CH2M Hill.	DDSP-F	2/3/99
EPA (Turpin and Dr. Simon) provide to Corps Huntsville additional comments on Atlanta Risk Assessment meeting.	EPA	ASAP
Provide Biotreatability progress report to DDSP-F, EPA and TDEC.	CEHNC Venture Capital/Greg Jenkins	2/1/99
Contact DRC regarding lead-based paint abatement project. Pre-construction meeting scheduled for 2/4/99.	DDSP-F	1/27/99
Prepare letter regarding concurrent renovation/abatement work.	CESAM	2/4/99
Provide submittal schedule for post removal reports on military housing and cafeteria.	CESAM/OHM	1/29/99
Submit draft EE/CA and Action Memorandum for the Parcel 35/28 EE/CA to DDSP-F, EPA and TDEC for on board review at April BCT.	CEHNC/CH2M Hill	3/22/99 (or sooner if possible)
Prepare cover letter to EPA and TDEC for submittal of draft EE/CA/ Action Memorandum.	DDSP-F	3/15/99
Provide Alma Moore agenda items for Partnering Session.	ALL	1/27/99
Contact USGS/other Region IV locations regarding relocating existing pressure transducers and borrowing extra transducers to use short term.	EPA	ASAP
Contact USGS and request recent transducer data.	EPA	ASAP
Contact Boart/Longyear and identify if/when and costs for mobilization at Depot after next mobilization at NAS Millington.	CESAM/OHM	w/ in next two weeks
Provide DDSP-F exact sampling dates.	CESAM/OHM	1/22/99

Advise community of upcoming monitoring well sampling in community northwest of Dunn Field.	Frontline	2/2/99
Provide Public Health Assessment data tables and maps for 30-day/ASAP data validation by DDSP-F (CEHNC/CH2M Hill), EPA and TDEC.	ATSDR	3/12/99
Provide comments to CEHNC on draft OU1 Field Sampling Plan Addendum (provided to BCT at 1/22/99 meeting).	DDSP-F, EPA, TDEC and Frontline	Frontline - 1/29/99 BCT 2/19/99
Provide OU1 Workplan to DDSP-F, EPA and TDEC with Response to Comments.	CEHNC/CH2M Hill	3/3/99
Frontline inform community of upcoming Dunn Field investigation for waste sites.	Frontline	ASAP
Identify costs of purchasing transducers as part of pumping system O&M.	CESAM/OHM	ASAP
Negotiate with Belz Properties and attempt to obtain permission to install monitoring well "V" on Belz property.	DDSP-F/DLA/CEHNC	1/27/99

Status of November-December Action Items

Action Item	Responsibility	Status
Discuss format and content of "Comfort Letter" regarding the status of proposed no further action sites with James Covington/MDRA.	Shawn Phillips/DDSP-FE	DDSP-F will modify existing draft letter and submit to EPA/TDEC for review. Due end of February.
TDEC provide comments on the draft <i>Basis for No Further Action</i> document.	Jordan English/TDEC	TDEC will provide comments by February BCT.
TDEC provide written comments or statement that there are no comments on the community relations plan.	Jordan English/TDEC	TDEC comments will be provided by 1/29/99.
Provide the Public Relations Plan for Defense Depot Ogden Utah to DDMT.	Scott Bradley/CEHNC	Plan provided.

Discuss specific language for the Parcel 3 FOSL.	BCT	Installation of signs. warning of potential pesticide hazards was included in the Parcel 3 FOSL.
Prepare groundwater presentation for January RAB. Submit to CEHNC, EPA, TDEC, DDSP-FE for review.	Greg Underberg/ CH2M Hill	Groundwater presentation was submitted and BCT comments were incorporated.
Submit Draft Functional Unit text for TDEC, EPA, and DDSP-FE to review prior to February BCT.	CH2M Hill	On schedule.
CESAM provide schedule for lead-based paint removal in Parcel 2 to DDSP-FE.	Kurt Braun/CESAM	Schedule was provided.
CEHNC and DDSP-F review letter of intent with City of Memphis to determine necessary actions regarding installation of the permanent groundwater transfer system at Dunn Field.	Dorothy Richards/ CEHNC, Shawn Phillips/DDSP-FE	Meeting was held. See discussion below.

Review of Project Status

Dorothy Richards provided a review of ongoing Depot projects. The Main Installation Remedial Investigation (RI) Report is on schedule. The team discussed whether a risk assessment should be performed on more than one site within each functional unit. Greg Underberg will verify with Vijaya Mylavarapu that her approach to risk assessment is to use the Preliminary Risk Evaluation (PRE) as a tool to sort the sites within each functional unit by risk priority, then perform the baseline risk assessment (BRA) on the site with the highest PRE-based risk. If the calculated risk from the BRA falls below EPA-acceptable levels, no other sites within that functional unit will proceed through the BRA.

The RI Example Functional Unit (EFU) will be distributed on February 9, 1999, for BRAC Cleanup Team (BCT) review. The EFU will consist of an annotated outline, data tables and risk assessment. The purpose of the review is to determine if the risk assessment approach is sufficient for the RI. The Depot will provide CH2M Hill a cover letter for direct distribution of the EFU to Environmental Protection Agency (EPA) and Tennessee Department of Environment and Conservation (TDEC).

Ms. Richards will provide a progress report of the bioremediation field tests by February 1, 1999. Ms. Richards also indicated that progress on the Dunn Field RI was on schedule.

Kurt Braun will provide a schedule for the Lead-Based Paint Abatement Project on February 4, 1999. A preconstruction conference will be held on February 4, 1999. Mr. Braun suggested the Memphis Inter Faith Association (MIFA) attend the conference to

become familiar with the construction activities. Shawn Phillips will ask the Depot Redevelopment Corporation (DRC) to invite MIFA to the preconstruction conference. Mr. Braun said that work on the Lead-Based Paint Abatement Project will begin on February 8, 1999, and be completed by April 5, 1999.

OHM/IT will submit the post-removal reports for the cafeteria and housing areas prior to the February BCT meeting. Mr. Phillips stressed that the report must include the analytical results from fill material samples and confirmation samples.

Housing Area Risk Assumptions

Alma Moore expressed concern that the risk assessment assumptions for the housing area consider the long-term resident scenario since long-term caretakers will be onsite even though the area will be used for temporary housing. Mr. Phillips replied that the long-term resident exposure scenario will be considered in the Main Installation RI. Mr. Phillips also said that MIFA is concerned about safety and will not inhabit the housing area until EPA and TDEC indicate that it is safe.

There was some discussion whether the fence separating the housing area from the ballfield would keep Housing area residents from soils that have not been removed from the ballfield and playground. Turpin Ballard said that the trespasser scenario to be included in the Main Installation RI would evaluate risks associated with trespassing on the ballfield or playground area.

Doris Bradshaw asked Steve Offner if OHM/IT's subcontractor for the Lead-Based Paint Abatement Project was a minority contractor. Mr. Offner will check the status of the subcontractor.

Ms. Richards said that the Parcel 28 and 35 Engineer Evaluation/Cost Analysis (EE/CA) will be submitted for review on March 22, 1999. Turpin Ballard requested moving up the EE/CA submission by five days to accommodate a BCT review on April 16, 1999. An onboard review of the Parcel 28 and 35 EE/CA is scheduled for April 16, 1999. There was discussion regarding the submission of the Action Memorandum for this EE/CA. The BCT requested that the Action Memorandum be submitted at about the same time as the EE/CA to facilitate review.

Ogden Community Relations Plan

Denise Cooper reviewed the Ogden Depot Community Relations Plan. She said that the Memphis Depot Community Relations Plan contains most of the elements of the Ogden plan, but items such as emergency response providers and memorandums of agreement with local hospitals were still needed from the Site Safety Submission. Mr. Phillips discussed scheduling a trip to Ogden, Utah to view their Chemical Warfare Material (CWM) removal operation. Alma Moore proposed that Restoration Advisory Board (RAB) members also attend. Mr. Phillips said that the trip would likely take place in May or June. DLA may issue invitational orders to pay travel costs for two community representatives from the RAB.

BRAC Parcel Status

The Parcel 3 Finding Of Suitability to Lease included a description of signs that notify people using the golf course that historically pesticides were applied on the property. The

BCT determined that Subparcels 4.6 and 4.7 should change from an Environmental Condition of Property (ECP) Category 5 to a Category 2 based on documented releases of petroleum products and TDEC underground storage tank permit closure approval.

Partnering Session

Terry Flynn discussed potential locations and the attendance of the Partnering Session scheduled for February 24 and 25, 1999. Ms. Bradshaw suggested community involvement to help "break down the wall of distrust" that she says exists between the Depot and the community. Mr. Phillips and Mr. Ballard replied that the meeting was meant to coordinate internal communications and essentially be a working session between the government agencies and contractors involved in the work. The public has not been involved in the past; however, Mr. Phillips said the BCT would consider the proposal. The United States Geological Survey (USGS) and the Corps of Engineers Waterways Experiment Station (WES) will not attend the Partnering Session.

David Ladd has replaced Ank Webber/Jack Carmichael as the USGS contact for the Depot. Mr. Carmichael is still with the USGS and is available as a resource, but will not be involved in the day-to-day work at the Depot.

Use of Groundwater Level Monitoring Transducers at Dunn Field

Mr. Offner and Mr. Underberg proposed using pressure transducers in monitoring and pumping wells to measure the effect of individual pumping wells on the groundwater surface. This data is needed to help place additional water level monitoring piezometers. Because the wells are pumping less than the designed discharges, there may be greater impact on the drawdown than was originally expected. Therefore, the placement of the four transducers identified in the Operations and Maintenance Manual may not be optimal. Mr. Offner and Mr. Underberg proposed running one pumping well at a time and measuring the drawdown of groundwater in the surrounding wells. Because the wells respond quickly to changes in hydrologic conditions, manual monitoring of the wells is not practical.

There was discussion about using the USGS transducers, both those currently at the Depot and others that may be available, during this field effort. Mr. Ballard replied that USGS did not have extra transducers, but would contact USGS to see if we could use the ones currently in the wells during this one to two day field effort. Chris King suggested that Mr. Ballard contact the EPA laboratory in Ada, Oklahoma, to determine if transducers were available. Mr. Offner will prepare a cost proposal for performing the drawdown analysis using rented pressure transducers.

Use of Independent Laboratories

Ms. Bradshaw raised a concern that independent laboratories were not being used for the Depot sampling analysis. Mr. English replied that TDEC does independent sampling and analysis at the Depot. Ms. Richards said that the Corps of Engineers Missouri River Division also does independent confirmation analysis of contractor samples.

Role of the United States Geological Survey

There was discussion regarding the role USGS should have in the Depot program. Mr. Underberg said that USGS has provided valuable experience with regional geology

interpretation during work planning and field analysis. After some discussion, it was determined that USGS should be used in the review and oversight of the groundwater investigation as well as providing consultation as needed during the project.

ATSDR Project Update

Dr. Crellin provided an overview of the Agency for Toxic Substance and Disease Registry (ATSDR) update to the Depot Site Review and Update. The name of the Site Review and Update has been changed to a Public Health Assessment (PHA). It is not that unusual to prepare two assessments for one National Priorities List site. The document is still being written. With the possible exception of the Rozelle neighborhood west of Dunn Field, Dr. Crellin's assessment remains the same: the site does not currently pose a health hazard to the surrounding community.

The assessment will issue an indeterminate statement regarding the past impact. There is not enough data from the past to say there was no impact, and Dr. Crellin cannot fill the data gaps to speculate. Ms. Bradshaw suggested Dr. Crellin interview older residents and former employees to see what they have to say. Dr. Crellin responded that they would not have specific data such as types and amounts of materials released into the community, so the assessment results would be the same - indeterminate. Ms. Bradshaw commented that she wanted answers to the exposure issue and to move on to getting the community help in dealing with environmental health issues. Dr. Crellin indicated ATSDR was looking into establishing a health clinic in the community.

Mr. Phillips asked about the status of ATSDR's proposal to conduct sampling in the surrounding community. Dr. Crellin indicated the ATSDR project manager will begin developing the workplan this spring and will coordinate with EPA, TDEC and the local health department. Ms. Bradshaw indicated that the community will have an independent laboratory analyze the samples as well.

Dr. Crellin said he hopes to provide the PHA data tables and maps to the Depot, EPA and TDEC by March 12, 1999, for data validation. He requested the parties provide comments within 30 days, or before, in order to complete the draft document. ATSDR anticipates providing the draft PHA six weeks after receipt of comments. The Depot, EPA, TDEC and members of the Greater Memphis Environmental Justice Work Group will receive the draft PHA. Once comments on the draft are received and appropriate comments incorporated, the PHA will be submitted for public review and comment.

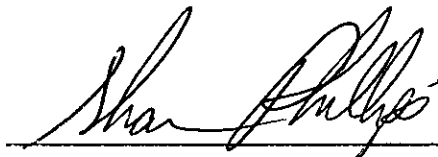
Presentation of Dunn Field RI Workplan Addendum

Tom Beisel presented the workplan addendum on January 22, 1999, that describes changes to the Operable Unit 1 Field Sampling Plan (September 1995). The addendum was prepared because geophysical information, soil gas analysis and identification of organic compounds in soil during construction of the Dunn Field groundwater pumping system indicated that organic constituents within Dunn Field may be beyond the areas assumed during preparation of the 1995 RI workplan. The schedule for review of the workplan addendum is as follows:

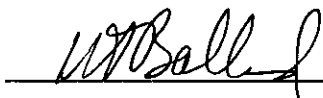
- Comments submitted by February 19.
- Comment responses and updated workplan addendum submitted by March 3.
- Field Mobilization scheduled for March 8.

Mr. Ballard and Mr. English will call CH2M Hill directly with questions and comments during the review to expedite resolution. Several points were brought up in the discussion and will be addressed in the revised workplan addendum:

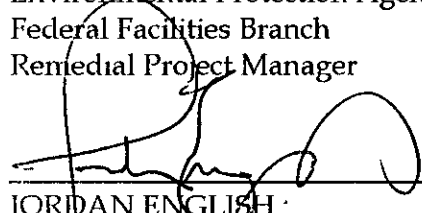
1. Jordan English questioned if methane was ever run or will be analyzed in borings placed within the disposal areas? Tom Beisel will evaluate using a field screening technique for methane.
2. Turpin Ballard requested that the standard operating procedure (SOP) for use of an Encore sampler for organics analysis be included in the addendum, if it was not included in the workplan addendums for Operable Units 2, 3 and 4. EPA must review and approve the SOP prior to use of this sampling technique.
3. Turpin Ballard requested that lead analysis be added to subsurface samples from Area F and Site 4 to evaluate vertical migration of fuels.
4. Jordan English asked if semi-volatile compounds were previously analyzed by Law Environmental. Tom Beisel will evaluate.


SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator

2/24/99
DATE


TURPIN BALLARD
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager

2/24/99
DATE


JORDAN ENGLISH
Tennessee Department of Environment and Conservation
Division of Superfund
Remedial Project Manager

2/24/99
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