

THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 553

BRAC Cleanup Team

Meeting Minutes

March 18, 1999

Attendees

Name	Organization	Phone
Greg Underberg	CH2M Hill	(423) 483-9032
Stanley Tyler	RAB Member	(901) 942-0329
Shawn Phillips	Depot	(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
Jennifer Hall	Frontline	(888) 848-9898
Denise K. Cooper	Depot	(901) 544-0610
Jack Kallal	Depot	(901) 544-0614
Mike Lee	Depot	(901) 544-0612
Dorothy Richards	CEHNC PM-ED	(256) 895-1463
Scott Bradley	CEHNC	(256) 895-1637
Kurt Braun	CESAM	(334) 690-3415
Ted Valentine	COE	(901) 544-3430
Peggy DuBray	COE	(931) 454-6630
John Rollyson	COE	(931) 454-3580
Steve Offner	OHM/IT	(770) 326-2571
Jack Carmichael	USGS	(615) 837-4704
David Ladd	USGS	(615) 837-4773

Review of Previous Meeting Minutes

The BCT discussed, approved and signed the February meeting minutes

BRAC Parcel Environmental Condition of Property Category Changes

The BCT agreed that Parcels 19.1, 23.7 and 23.8 change from an ECP Category 7 to a Category 3 based on results of visual inspections conducted by EPA, TDEC and the Depot after the February BCT meeting.

Review of Project Status

Dunn Field Remedial Investigation

Dorothy Richards provided a review of ongoing Depot projects. Sampling for the Dunn Field Remedial Investigation (RI) began with mobilization on March 8, 1999. Field work began on March 9, 1999. Soil boring process going as planned with 22 borings collected to date. Nothing unexpected has been found, even though clothing was discovered in the food burial location. Results of the continuous air monitoring conducted during the boring process have indicated nothing above background.

Main Installation Remedial Investigation

Ms. Richards indicated the report for the Main Installation RI was on schedule to be available for review in August 1999.

Biotreatability Update

Ms. Richards continued the project update with the second Golf Course soil biotreatability progress report prepared by Venture Capital. One sample plot showed a statistically valid reduction. Across the board, there was not enough reduction to be considered statistically valid. Venture Capital continues to work the application methods to determine the best method. Ms. Richards said that Venture Capital had noted that their sample results were consistently higher than results from samples collected by CH2M Hill. She indicated that the consistent difference in sample results was due to the dieldrin being mainly in the upper surface soil and that Venture collected samples nearer to the surface, whereas Hill collected deeper samples. Venture Capital has requested the next sampling period be pushed back one month, which will delay submittal of the final report. Mr. Scott Bradley indicated the basic data regarding effectiveness of the biotreatability process and best application method could be provided before the actual submittal so that the BCT could begin the decision making process. The Corps does not want to delay the BCT's ability to decide to move forward with the biotreatability option as the best time for application would be this spring/summer.

Dunn Field and Main Installation Engineering Evaluation/Cost Assessments

The Depot, EPA and TDEC received the EE/CA for OU 1 (CWM) from Parsons Environmental on March 15, 1999. Comments are due back to Parsons by April 29, 1999. The recommended alternative was to remove the burial pits and transport the waste off site for proper disposal based on analytical results and if any intact material were found. This alternative was not the least expensive, but would allow for unrestricted public use.

With the current schedule for the OU 1 EE/CA, a public meeting has been scheduled for June 12, 1999. Preliminary thoughts on the public meeting included a two hour public meeting/comment session for formal comments that would be addressed in the Responsiveness Summary, and conducting an availability session, either concurrently with the public meeting or after the public meeting.

The recommended alternative presented in this EE/CA includes removing the burial pits and transporting the waste offsite for proper disposal, depending on what is found during

removal and analytical results. If any intact CWM materiel is discovered, it will be stored at the temporary holding facility located at Dunn Field until the Program Manager for Non-Stockpile Chemical Warfare Materiel can arrange transportation to Pine Bluff Arsenal, AR for disposal. If no intact CWM materiel is discovered, then the waste will be analyzed and disposed accordingly.

Annotated comment responses for the Parcel 35/28 EE/CA will go out on April 1, 1999. One week after resolution of BCT comments, the document will be reissued and placed in the Information Repositories (IR). The public comment period will begin after the document has been placed in the IRs.

The EE/CA for Main Installation Hot Spots was shipped directly from CH2M Hill to EPA, TDEC and the Depot. Need to coordinate the review and comment scheduled with the Parcel 35/28 EE/CA. The BCT agreed that public comment periods and public meetings for both Main Installation documents should be combined because the recommended alternatives are similar.

Family Housing

Mr. Kurt Braun informed the BCT that the project was progressing, but asbestos containing material (ACM) had been identified in the window caulking had to be abated before work to replace the windows could continue. The Depot had initiated the appropriate contract action to remove the ACM, but had not yet received a schedule for the abatement.

At this point, Mr. John Rollyson presented Mr. Steve Offner of OHM/IT with a safety certificate.

Dunn Field Groundwater Project

Mr. Greg Underberg, CH2M Hill, and Mr. Steve Offner, OHM/IT, presented an update of the Dunn Field pump and discharge system and its affect on the fluvial aquifer. Mr. Offner presented water flow charts for each recovery well and the total flow. The flow charts showed a reduction in flow rates after a period of pumping that coordinates with draw down in the recovery and monitoring wells. The system adjusts the flowrate automatically to maintain the water level in the recovery wells just above the pump. Overall, the system appears to be dewatering the area.

No evidence that the pump filter or screen had become clogged which could account for the reduced flow rates. According to Mr. Offner, very little iron has been found in the water (70 ppb being highest value) and the water leaving the system appears very clear with little turbidity (<10 ntu). The northern wells indicate a drawdown of up to 5 feet, but the southern wells show less drawdown. Mr. David Ladd, USGS, said that transducers in monitoring wells west of the pump system were also showing a drawdown. Mr. Underberg indicated that two wells that were hydraulic disconnected from the recovery wells showed about a 2 foot drawdown, which may indicate the flow rate reduction to be due to a seasonal variance. Mr. Jack Carmichael, USGS, indicated that water levels in the fluvial aquifer usually go up during this season. Mr. Offner indicated that the flow rate reduction had not leveled off, but still continued to drop. To further evaluate the flow rate reduction, Mr. Offner said they had turned off most of the recovery wells then restarted them and saw an immediate drop in water levels. He concluded that the aquifer was not recharging fast enough to keep up with pumping.

Mr. Offner indicated that the recovery wells were pulling in compounds since trichloroethylene (TCE) concentrations had spiked at 225 ppb the first week and then fallen to 116 ppb. And, OHM/IT has seen more 1,1,1-trichloroethane (TCA) in RW4. The recovery wells are pulling in the contamination, but are the wells containing the contamination? OHM/IT continues to evaluate the system and the need for additional recovery wells south of the existing wells. Due to the flow rate reduction and aquifer dewatering, the new wells may need to be smaller. Mr. Offner said that a couple of the pumps are in danger of burning out because of the reduced flow rates and may need to be replaced with smaller pumps. Mr. English asked if pulsing the pumps would ease the load on the pumps. Since intent is to create a barrier, Mr. Offner indicated pulsing the pumps would not accomplish the intent.

USGS provided graphs depicting seasonal fluctuations of the fluvial aquifer outside the influence of the Depot's pumping system.

Mr. Phillips commented that if the final remedial decision for Dunn Field was to remove the sources, then he wanted the contractors to look at reinjection to assist the pumping system to remove contaminants. He also requested USGS have a more visible presence in the cleanup process to include attending and making presentations at Restoration Advisory Board meetings. Mr. Carmichael indicated his organization would have no problem providing a general overview of the area's hydrogeology and how this site fits into that overview.

Main Installation Groundwater Project

Mr. Underberg presented several graphics depicting fluvial aquifer water flow at the Main Installation. It appears that water is flowing onto the Depot at the southwest corner. Mr. Underberg indicated that groundwater samples had revealed compounds that had not been identified in soil at depth on the Main Installation. The evaluation of compounds in the groundwater at the southwest corner would continue; however, if the evaluation indicated the compounds were flowing onto the Depot from an offsite source, then TDEC would look for other sources.

Schedule Impacts

Mr. Phillips provided the BCT the latest document review and comment schedule that included Findings of Suitability to Lease and to Transfer. However, it did not include the BRAC Cleanup Plan or Community Relations Plan annual updates. Mr. Phillips will add both documents and reissue the schedule. Mr. Ballard wanted to see less time between submittal of the Main Installation Proposed Plan and the Record of Decision. Mr. English noted that his organization needed as much time as possible to review the submittals scheduled for this year.

Environmental Condition of Property (ECP) Category Clarification

Parcel 19.1

The BCT agreed that the ECP Category 7 for Parcel 19.1 be changed to Category 3 based on results from the visual inspection performed by Mr. Ballard, EPA, Mr. Brian Deeken, TDEC, and Mr. Phillips, the Depot, on February 18, 1999.

Parcel 23.7 and 23.8

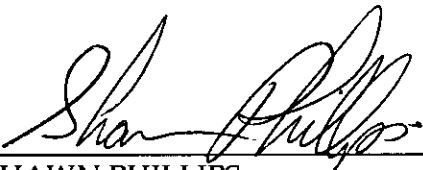
The BCT agreed that the ECP Category 7 for Parcels 23.7 and 23.8 be changed to Category 3 based on results from the visual inspection performed by Mr. Ballard, EPA, Mr. Brian Deeken, TDEC, and Mr. Phillips, the Depot, on February 18, 1999.

Restoration Advisory Board Meeting


In response to a question posed at the February RAB meeting regarding the lack of a public meeting before work began on the removal action at the Family Housing Units, Mr. Ballard had reviewed the project files and determined an error occurred. The Depot did not prepare an Action Memorandum regarding the removal action, nor did the Depot notify the public that an Action Memorandum was available. No public meeting was required for this removal action; however, preparation of the Action Memorandum and public notification was required. Mr. Ballard indicated EPA had failed to properly advise the Depot about the Action Memorandum and public notification.

Mr. Ballard proposed that the Depot prepare the Action Memorandum to document the decision to remove soil at the Family Housing Units and also prepare a "bridging" document that explains that the Action Memorandum should have been created before the removal action began. The "bridging" document should also contain the BCT meeting minutes documenting the removal action decision. Mr. Ballard continued that the Depot should notify the public that the Action Memorandum and associated Administrative Record were available then allow public comment about the action. Mr. Ballard also indicated that EPA does not have an enforcement role in removal actions at the Depot because, under Executive Order 12580, the Department of Defense is not required to obtain EPA concurrence on removal actions.


Mr. Phillips will prepare the Action Memorandum and the "bridging" document with assistance from the Corps of Engineers Huntsville and CH2M Hill and have it ready for the April 15, 1999, BCT meeting. Ms. Moore will place the Post Removal Reports for the Family Housing Units in the Information Repositories on Monday, March 22, 1999.


SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator

5/20/99
DATE


TURPIN BALLARD
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager

5/20/99
DATE


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

5/20/99
DATE

Action Item	Responsibility	Start - Suspense Date	Completed Date
Provide standard operating procedure for Encore Sampler to EPA for approval (email to Turpin Ballard and Fred Sloan).	CH2M Hill		2/19/99
Coordinate with CEHNC to have CH2M Hill sample Building 465 sump sediment.	Depot		3/4/99
Provide comments on draft <i>Basis for No Further Action</i> .	TDEC		
Provide comments on draft final <i>Community Relations Plan</i> .	TDEC		2/23/99
Modify "comfort letter" regarding status of proposed no further action sites and provide to DRC.	Depot		
Provide biotreatability progress report to Depot, EPA and TDEC.	CEHNC/Venture Capital	3/2/99	3/19/99
Provide Depot, EPA and TDEC post removal reports on family housing.	CESAM/OHM		3/18/99
Prepare cover letter and forward post removal reports to EPA and TDEC.	Depot		3/18/99
Provide comments on draft EE/CA for Parcels 28/35.	TDEC		3/16/99
Coordinate with CEHNC to clean the interior of Buildings 1090 and 1091 during early removal activities for Parcel 35.	Depot		3/4/99
Verify that OHM received recent transducer data from USGS.	CESAM		2/22/99
Provide date for installation of additional monitoring well. Contact Boart Longyear to identify when/if mobilization at Depot after next mobilization at Millington.	CESAM		
Provide comments on draft OU1 FSP Addendum to CEHNC/CH2M Hill.	TDEC		2/24/99
Provide final OU1 FSP Addendum to Depot, EPA and TDEC.	CEHNC/CH2M Hill		
Inform community of upcoming Dunn Field	Frontline		3/6/99

Remedial Investigation field work.			
Inform Depot Facilities personnel not to remove sample location flags at Dunn Field.	Depot		3/1/99
Verify community notification/public hearing requirements/EPA normal practices in anticipation of EE/CA for Parcels 28/35 out for 30-day public review/comment period.	EPA/Depot/ Frontline		2/24/99
Verify community notification/public hearing requirements/EPA normal practices in anticipation of EE/CA for DRMO out for 30-day public review/comment period in May/June 1999.	EPA/Depot/ Frontline		2/24/99
Verify community notification/public hearing requirements in anticipation of EE/CA for CWM out for 30-day public review/comment period in July 1999.	CEHNC OE/Depot/ Frontline		2/24/99
Provide Depot any BRAC sampling requirements for Buildings 783/793 (Igloos) or Parcel 19 hard stand area.	TDEC		3/8/99
Provide to Depot, EPA and TDEC draft EE/CA Removal of Hot Spot Areas, Main Installation for 30-day review.	CEHNC/CH2M Hill		3/12/99
Provide comments on draft EE/CA Removal of Hot Spot Areas, Main Installation.	Depot, EPA, TDEC		
Provide Public Health Assessment data tables and maps directly to CH2M Hill and Depot for 30-day/ASAP data validation. Depot will forward to EPA and TDEC.	ATSDR		3/8/99
Action Items from March BCT Meeting		Start Date	Suspense Date
Have Facilities clean sump in same manner as the oil/water separators were cleaned in the past. Once completed, inform regulators.	Depot	3/18/99	4/9/99
Provide cover letter transmitting biotreatability progress report to BCT.	Depot	3/18/99	4/9/99
Provide Belz property access agreement language internal review copy to EPA/TDEC.	Depot	3/18/99	3/19/99

Action Items from March BCT Meeting		Start Date	Suspense Date
Prepare fact sheets regarding Hill's safety procedures in place during this round of field sampling.	Frontline/CH2M Hill	3/18/99	ASAP
Review and provide comments on draft EE/CA for OU 1 (CWM).	EPA/TDEC/Depot	3/18/99	4/29/99
Provide annotated comment responses on EE/CA for Parcels 35/28.	CEHNC/CH2M Hill	3/18/99	4/1/99
Review and provide comments on EE/CA for Main Installation Hot Spots. Comment period will be coordinated with EE/CA for 35/28.	EPA/TDEC/Depot	3/18/99	?
Prepare Action Memorandum and "bridging" document for removal action at Family Housing.	Depot	3/18/99	4/15/99
Include BCP and CRP in submittal review schedule.	Depot	3/18/99	4/15/99 or before
Place Post Removal Reports for Family Housing Area in Information Repositories.	Frontline	3/18/99	3/22/99
Provide 12 copies of the Post Removal Report for Cafeteria to Depot.	CESAM/OHM	3/18/99	3/30/99
Prepare cover letter and forward Post Removal Report for Cafeteria to EPA/TDEC.	Depot	3/18/99	3/31/99

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