



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 556

**BRAC Cleanup Team**

**Meeting Minutes**

**May 20, 1999**

**Attendees**

<b>Name</b>	<b>Organization</b>	<b>Phone</b>
Greg Underberg	CH2M Hill	(423) 483-9032
Randy Underwood	CH2M Hill	(703) 471-6405
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
John DeBack	Depot	(901) 544-0622
Denise K. Cooper	Depot	(901) 544-0610
Jack Kallal	Depot	(901) 544-0614
Neal Anderson	CESAM	(901) 686-6195
Dorothy Richards	CEHNC PM-ED	(256) 895-1463
Kurt Braun	CESAM	(334) 690-3415
Ted Valentine	COE	(901) 544-3430
Steve Offner	OHM/IT	(770) 326-2571

NOTE: Turpin Ballard's email address has changed to ballard.turpin@epa.gov.

**Review of Previous Meeting Minutes**

The BCT discussed, approved and signed the March meeting minutes.

**Memphis Depot Web Site**

Mr. Stanley Tyler of the Restoration Advisory Board (RAB) requested a response to his letter regarding the status of the Memphis Depot web site. Mr. Shawn Phillips indicated the response was being completed and would be provided at the RAB meeting later that evening.

## **BRAC Parcel Environmental Condition of Property Category Changes**

### *Parcel 19.2*

The BCT agreed that Parcel 19.2 change from an ECP Category 7 to a Category 3 based on results of usual maintenance of the vehicle wash sump in Building 465.

### *Parcel 19.3*

The BCT agreed that Parcel 19.3 change from an ECP Category 7 to a Category 4 based on results of usual visual inspection performed by the EPA, TDEC and the Depot following the February meeting to identify if a 1993 PCB spill in Building 469. Ms. Cooper had contacted former HazMat Response Team On Scene Coordinator, Mr. George Gilliard, regarding the spill. Mr. Gilliard confirmed the spill location as being on the west side of the door located on the building's south side. Mr. Gilliard also indicated the contaminated concrete and wallboard was removed during the sampling procedure as there was so little of it. Mr. Ballard and Mr. Phillips agreed the visual inspection revealed no evidence of staining at that location and that the contaminated material had been removed.

### *Parcel 23.5*

The BCT agreed that Parcel 23.5 remain an ECP Category 1 since no releases were documented in the building that would be contributing to the groundwater contamination under the building. EPA will base their property transfer decision on the environmental media (soil) surrounding the building.

## **Parcel 3 and Remedial Action Definitions**

In discussing the environmental condition of property category for Parcel 3, the BCT requested Mr. Ballard and Mr. DeBack obtain EPA and Department of Defense interpretations of institutional controls and land-use controls as remedial actions. The BCT has proposed changing Parcel 3 from Category 7 to Category 6 with institutional controls being the remedial action that would be proposed in the ROD for the golf course. Once approved, institutional controls would be implemented and the property then changes to an ECP Category 4.

## **Belz Property Access Agreement**

Mr. Phillips indicated the Defense Logistics Agency had received comments from Belz on the draft access agreement provided to EPA and TDEC in March. DLA has approved changes to the agreement based on Belz's comments. Mr. Phillips provided the Belz comments and the latest agreement to EPA and TDEC. Mr. Phillips indicated he would continue working the agreement closely with DLA to speed the approval and signature process.

## **Review of Project Status**

### *Dunn Field Remedial Investigation*

Mr. Greg Underberg reported that the fieldwork was completed. The sampling data is coming back and going through the data validation process. About 150 soil samples were collected and analyzed. Soil borings did not go below 40 feet below ground surface.

### *Main Installation Remedial Investigation*

Mr. Underberg reported that the draft of RI report for Functional Units 3 and 7 was provided to CEHNC, the Depot, EPA and TDEC on May 14 for review. Comments are due to CEHNC on July 13, 1999. CH2M Hill continues working the draft RI report for the other functional units for the next submittal date in August 1999.

### *Biotreatability Update*

Ms. Dorothy Richards reported that CEHNC received the third biotreatability update from Venture Capital. The statistics from the three data points shows a reduction in dieldrin levels, but Venture Capital is concerned that the downward trend is an anomaly and that there is not enough data to validate the effectiveness of the biotreatability method. Ms. Richards has requested Venture Capital prepare a government estimate to collect two more rounds of sample data. Mr. Phillips asked Mr. Turpin Ballard if remediation would be required for dieldrin at Parcel 3 as the risk assessment indicates that the highest risk was  $10^{-5}$  for the adult golfer scenario and that removal action may not be required if institutional controls are put in place. Mr. Phillips requested Mr. Ballard talk with Dr. Ted Simons about this issue.

The BCT discussed the need for and use of institutional controls and land-use restrictions at Parcel 3. Mr. Jordan English wants to see the BCT determine and agree now the plan for institutional controls at Parcel 3 in order to be prepared in case the ROD requires institutional controls. Mr. John DeBack indicated that one of the Depot Redevelopment Corporation's alternatives is to erect a fence around the golf course.

Ms. Richards reminded BCT that the biotreatability method might be used on other areas with higher pesticide levels. Mr. Phillips directed Ms. Richards to obtain the cost estimate. If the cost is reasonable, then Mr. Phillips may direct Ms. Richards to obtain the two additional rounds to have the data available.

### *Dunn Field Engineering Evaluation/Cost Assessment*

Parsons Environmental received Depot, EPA and TDEC comments. Parsons will prepare and forward the final Engineering Evaluation/Cost Assessment for Operable Unit 1 Chemical Warfare Materiel on June 3. The Depot will place the document in the information repositories on June 7 and will place advertisements in local newspapers announcing that the 30-day public comment period will begin on June 8, 1999. The availability session and public meeting is scheduled for June 17. Ms. Alma Moore, Mr. Steve Dunn and Mr. Phillips have notified the organizations involved in the project about the availability session and public meeting.

The Depot, EPA and TDEC received the draft Site Safety Submission/Work Plan. Comments are due to CEHNC on June 8, 1999. The document will then continue through

the review process at the Departments of the Army and Health and Human Services. The BCT anticipates the final Site Safety Submission will be available in September.

#### *Main Installation Engineering Evaluation/Cost Assessments*

The Depot, EPA and TDEC received the final EE/CA for Old Paint Shop and Maintenance Area/Parcels 35 and 28. The 30-day public comment period began on May 17, 1999 and will end June 18.

Mr. English and Mr. Brian Deeken voiced concern about cost estimate difference between draft and final documents. Mr. Randy Underwood explained that the draft cost estimate included landfilling costs for steel removed from the buildings and that recycling of the steel became the preferred disposal method in the final cost estimate, dramatically lowering disposal costs. Mr. English requested CH2M Hill provide clear explanations the next time they change strategies that significantly change the cost estimate.

Mr. English and Mr. Deeken also asked if the cost estimate included maintaining the fence, as the fence defines the industrial area. Mr. Underberg responded that the cost estimate did not include maintaining the fence. Mr. Phillips indicated that if maintaining the fence were included as an institutional control in the final ROD for the Main Installation, then DLA would assume that the cost would be delegated to the DRC. Mr. Phillips said the DRC plans to maintain the fence, and they have marketed the facility as secured by a fence. Mr. English requested language be added to the EE/CA indicating that the entire fence would be addressed in the ROD for the Main Installation.

The EE/CA for Main Installation Hot Spots has been postponed. The sites will continue through the remedial investigation process to determine if cleanup is required.

#### *Family Housing*

Mr. Steve Offner provided an update on the lead-abatement project at the Family Housing Units. The lead-abatement portion of the project is completed. OHM identified some quality issues with the finish carpentry work that are being worked with the subcontractor. The final inspection is scheduled for May 26. If the subcontractor has not resolved the quality issues, OHM will complete the work using in-house resources.

#### *Dunn Field Interim Remedial Action for Groundwater Project*

Mr. Phillips indicated he had prepared an Interim Remedial Action Completion Report. The report included the construction asbuilts and six months of sampling data provided to Memphis Light, Gas and Water in accordance with requirements of the Industrial Waste Water Discharge Agreement. Color photos were being reproduce and would also be included. Mr. Ballard requested the report also include summaries of the field activities. Copies of the report will be placed in the information repositories.

#### *Main Installation Groundwater Project*

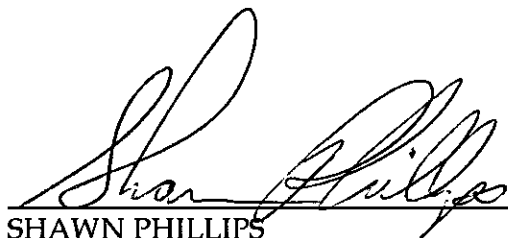
Mr. Underberg has begun looking for rotonic drilling contractors to install the monitoring well on the Belz property. He will keep Ms. Richards and Mr. Phillips informed via email regarding potential contractors and proposed construction schedules.

### Schedule Impacts

Mr. English voiced concerns that TDEC cannot meet the review schedule CEHNC proposed in March. TDEC has been unable to review FOSL 8 and FOST 1 in order to meet review schedules for EE/CAs. TDEC had placed the draft No Further Action Report on hold in order to meet the upcoming remedial investigation and feasibility study draft report review schedule. Mr. English and TDEC will continue to work to meet all review and comment tasks.

### Restoration Advisory Board Meeting

Mr. Ballard will provide the BCT Update at tonight's RAB meeting. Mr. Phillips reviewed the schedule for the availability session, RAB meeting and EE/CA public comment period. Mr. Ballard suggested that a general public comment period be provided after the general RAB business and before Mr. Underberg's EE/CA presentation. The BCT agreed that the public be given an opportunity for general comments before the presentation and that the official EE/CA public comment period would begin after the presentation. Ms. Jennifer Hall suggested that there also be an opportunity for the public to ask questions about the presentation before the public comment period. The BCT agreed.



SHAWN PHILLIPS

6/17/99  
DATE

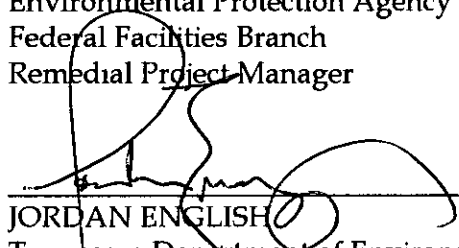
Memphis Depot Caretaker  
BRAC Environmental Coordinator



TURPIN BALLARD

6/17/99  
DATE

Environmental Protection Agency  
Federal Facilities Branch  
Remedial Project Manager



JORDAN ENGLISH

6/17/99  
DATE

Tennessee Department of Environment and Conservation  
Division of Superfund  
BRAC Cleanup Team member

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