



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 563

BRAC Cleanup Team

Meeting Minutes

June 17, 1999

Attendees

Name	Organization	Phone
Greg Underberg	CH2M Hill	(423) 483-9032
Terri Gray	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
Ed Hares	TDEC-DSF	(901) 368-7957
Turpin Ballard	EPA Region IV	(404) 562-8553
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
Scott Bradley	CEHNC	(256) 895-1637
Kurt Braun	CESAM	(334) 690-3415
Steve Dunn	CEHNC	(256) 895-1144
Gene Burr	Depot Redevelopment Corp	(901) 942-4939

Review of Previous Meeting Minutes

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

Review of Project Status

Dunn Field Remedial Investigation

Mr. Greg Underberg reported that the data qualification and database were completed. He had spoken with Boart-Longyear regarding a timetable to install the Belz property well. Boart-Longyear would be available the end of June or the end of July.

Mr. Underberg also discussed the proposed Remedial Investigation schedule modification: No change to the Record of Decision submittal date; the Feasibility Study would be pushed back to include data from the Belz property well. The BCT concurred with this schedule change (see attached letter). The draft Dunn Field RI will be submitted soon after the draft final Main

Installation RI is reviewed, therefore keeping the Main Installation and Dunn Field RI review schedules from overlapping.

Main Installation Remedial Investigation

Mr. Underberg reported that CH2M Hill continued working the draft RI report for the remaining functional units and that they will be submitted on August 24, 1999.

When asked by Mr. Turpin Ballard if the Belz property well data would be included in the Main Installation RI, Mr. Underberg responded that the data would not be available for the Main Installation RI. But, that it would be included in a complete hydrogeologic discussion of Dunn Field. Mr. Ballard indicated that the Main Installation FS could be amended, if necessary.

Biotreatability Update

Ms. Dorothy Richards reported that CEHNC amended the contract to collect two more data points. Mr. Richards proposed that Venture Capital present the findings to the BCT at the August meeting, and the BCT agreed.

Golf Course Risk Values

Mr. Jordan English brought up concern raised at last month's RAB meeting that the 2×10^{-5} in real numbers appears closer to 10^{-4} . He agreed that it did appear closer. Mr. Ballard reminded Mr. English that the values were based on very conservative scenarios. Mr. Ballard discussed the conservative scenario with Dr. Ted Simon, and both he and Dr. Simon are comfortable with institutional controls, such as the placement of signs warning of pesticide use, at the golf course based on the risk values from the conservative scenarios.

Mr. English also voiced a concern with quantifying the conservative scenario. Mr. Phillips indicated that the scenario could be quantified by looking at the numbers in the risk characterization equation from EPA's Risk Assessment Guidance for Superfund. He also indicated that he and Frontline had looked at golf courses around the country and discovered that it is not unusual to post signs warning golfers that pesticides and herbicides have been applied. He continued that 31 states require signs pertaining to the use of pesticides/herbicides. Furthermore, while 19 states do not require this, it is a common practice.

Mr. English indicated he wanted to discuss with his headquarters the conservative risk scenario and posting of signs as an institutional control to make sure they would approve this approach when time came to make a decision about the golf course.

Family Housing

Mr. Kurt Braun reported that the lead-based paint abatement project at the Family Housing Units was completed. Seven iron pieces for the front porches are being made and should be in place within two weeks. Mr. Braun requested that the Depot water and maintain the grass in the area. Mr. Phillips will make that request of Mr. Harold Roach, Facilities Engineers.

Dunn Field Engineering Evaluation/Cost Assessment

Parsons prepared and forwarded the final Engineering Evaluation/Cost Assessment for Operable Unit 1 Chemical Warfare Materiel on June 3. The Depot placed the document in the information repositories on June 8 and placed advertisements in local newspapers announcing that the 30-day public comment period will begin on June 10, 1999.

Mr. Phillips reminded everyone of the availability session from 4 p.m. until 6 p.m. prior to the Restoration Advisory Board meeting and public comment meeting.

Mr. Steve Dunn indicated he owed Mr. Phillips a letter regarding the schedule delay due to the Spring Valley project, not necessarily due to availability of the on-site laboratory. The Site Safety Submission, which was provided to the BCT for review and comment by June 8, is basically on schedule to go up for final approval in the fall. Field work will not begin until the winter or spring of 2000. The Ogden, Utah project is a little ahead of Memphis on the Site Safety Submission schedule.

Mr. English voiced a concern with how long any recovered intact CWM would remain in the Interim Holding Facility (IHF). Mr. Dunn indicated the scope of work called for any recovered CWM to be held in the IHF until completion of the project, then it would all go out in one trip.

Mr. Phillips added that Mr. Thom Hoff, Project Manager for Non-Stockpile Chemical Materiel, had explained it to him that the transportation plan would remain a draft document until any recovered intact CWM was out of the ground, identified and documented (manifested). Then, the transportation plan would go final, with all appropriate approvals, and the recovered CWM would move out. Mr. Phillips said Mr. Hoff had identified the proposed disposal location.

Mr. DeBack interjected that the governors of the states the CWM would travel through would be notified. Mr. English asked if the notification would go through him to the governor's office. Mr. Dunn will check into that. Mr. English also requested something in writing that says exactly how long any recovered CWM will remain in the IHF. Mr. Phillips tasked Mr. Dunn to write the Project Manager for Non-Stockpile Chemical Materiel with Mr. English's questions/concerns and request timeframes and process explanation.

Mr. Phillips and Mr. Ballard discussed fact that CWM removal project workplan did not include sampling for hazardous or toxic waste. Mr. Phillips reminded everyone that the team discussed coordinating sampling for hazardous or toxic waste in conjunction with CWM removal at the February partnering session. The BCT agreed that Hill should analyze the samples to maintain data consistency for the remedial investigation and that UXB's work plan needs to reflect the fact that UXB will collect the sample and turn the sample over to Hill, with the appropriate chain of custody.

Mr. Phillips tasked Ms. Richards to provide Mr. Underberg the work plan and to coordinate this issue with Mr. Dunn.

Dunn Field Interim Remedial Action for Groundwater Project

Mr. Braun indicated OHM was preparing the summary of action portion of the Interim Remedial Action Completion Report. Mr. Phillips will receive the report from OHM and forward to EPA and TDEC by July 9, 1999.

United States Geological Survey (USGS) Support

Mr. Ballard indicated that after the end of this fiscal year (September 30, 1999) he planned to stop having USGS monitor water levels to evaluate effectiveness of the pumping system as it is an operations and maintenance (O&M) action and should be an O&M responsibility. Mr. Braun has awarded the second round of O&M to OHM Remediation and it will end in November 1999. The contract provides option years, so Mr. Braun will write another option year into the contract.

Mr. Ballard will have USGS prepare an information package to include all the data they have collected. Mr. Ballard also will have USGS provide a groundwater briefing when the Remedial Investigation Report is completed and before the public for review.

Additional Recovery/Monitoring Wells

Mr. Underberg presented a pumping system update. The three southern-most recovery wells are not achieving pump rates, and the system is not completely capturing the contaminant plume south of the southern-most recovery well. Chloroform and carbon tetrachloride appears to be moving north from the suspected mustard neutralization/disposal pit. He proposed three more recovery wells along the fenceline, perhaps even off site in the Rozelle neighborhood.

Mr. Ballard asked if there was a control (monitoring) well off site to the west that may provide feedback on the systems effectiveness. Mr. Underberg responded there was one on Rozelle, but it was not close enough to provide information on the system's effectiveness. Mr. Ballard and Mr. English both indicated the need for an additional monitoring well between existing wells MW-33 and MW-32 and the western perimeter of Dunn Field. This location would be in a private lot along Rozelle, likely the abandoned church lot.

Mr. Braun indicated OHM was designing four monitoring wells to be placed at Dunn Field and was working with a local firm to construct those four wells. He proposed moving the location of one or more of the monitoring well to the Rozelle neighborhood. Mr. Braun indicated he needed a design and government estimate for the additional recovery wells.

Mr. Underberg had contacted Boart-Longyear, the rotosonic drilling company, and they could mobilize at Memphis in early June to drill the well on the Belz property for much less than usual because of the reduced mobilization costs due to the Millington job. They would complete the Millington job the third week of July and could possibly come back to drill any additional wells then. He would coordinate with them.

Mr. Underberg indicated he could produce the design for the recovery wells within two weeks, but could not produce the piping system design in two weeks. Once well design is completed then he can design the piping system. But, he needed to confirm with Boart-Longyear that they could put in the Belz property well and the three additional recovery wells before the Millington job. If they could not construct the additional recovery wells, then he would have more time to produce the designs for the additional recovery wells and pumping system.

Mr. Underberg suggested that the other three monitoring wells be moved offsite to better evaluate the containment of groundwater by the pumping system. The BCT agreed that just west of the Dunn Field fenceline would be a better location for these monitoring wells.

Mr. Phillips indicated that since the team now knew what the groundwater contaminants were, the well specifications should change from stainless steel to PVC with a stainless screen. The BCT agreed to this change. Mr. Underberg said he could have the specifications out in two weeks. With that Mr. Phillips tasked Mr. Underberg to produce recovery well designs and specifications for 8" PVC wells with stainless steel screens and provide both to Ms. Richards who will forward the designs and the appropriate funding to Mr. Braun.

Mr. Braun will call Mr. Phillips on July 1 with status on the installation of the wells, and Mr. Phillips will notify EPA and TDEC. Mr. Braun will coordinate with the Memphis Corps office to obtain access agreements on Rozelle to install the additional wells. Mr. Underberg suggested behind the church on Rozelle as a good location for a well. Mr. Braun, Mr.

Underberg and Mr. Steve Offner of OHM will identify the optimum locations for the proposed additional recovery wells and two monitoring wells.

CERFA Category and Land Use Controls

As tasked at the last BCT, Mr. Ballard had discussed the issue of land use controls and property transfer with his office. According to Mr. Ballard, the FOST must contain specifics of the remedial action to be implemented or the action must already have been taken. Mr. Ballard's legal office suggested the need for a land use control assurance document.

Mr. Phillips suggested that in order for the EPA to concur with a CERFA environmental condition of property category change for a parcel they need some sort of "cheque" that documents the land use controls that will be imposed. Mr. English indicated Millington had prepared a Institutional Controls Implementation Plan and that the Depot needed one as well. Mr. Phillips agreed that the Depot needed to prepare a Land Use Controls Assurance Plan for the Depot.

Mr. DeBack presented a scenario where a FOST for a parcel contains land use restrictions that must be implemented upon execution of a lease. The same language will be used in a FOST. A lease in furtherance of conveyance becomes a deed. Restrictions in the lease would/could be more restrictive than in the deed if leased prior to completion of the remedial investigation. He also commented that if the BCT developed a logical approach to land use controls and begins to move in that direction, then other stumbling blocks will be overcome.

Mr. Ballard indicated that once institutional controls were presented in a FOST, and the EPA found them acceptable, and the controls would carry forward into a deed, then EPA could approve changing a parcel's CERFA ECP category to facilitate transfer. Mr. Phillips indicated a Land Use Controls Assurance Plan must be included in the final record of decision, and Mr. English added that it must also include who will monitor and fund the controls.

Mr. Ballard will discuss with his headquarters the issue of lease restrictions/institutional controls within a lease in furtherance of conveyance and if these items can be accepted as evidence that a remedial action has been implemented for purposes of CERFA ECP category changes. Mr. Ballard will also discuss with his headquarters the applicability to the Depot of the Department of Interior law that says if park property is transferred as park property, it must remain park property in perpetuity.

City of Memphis Hays Road Widening Project

Mr. Phillips reminded the BCT of the City's desire to widen Hayes Road using a strip along the east side of Dunn Field. He indicated the only Installation Restoration Program site in the area was the clothing treated with impregnate at Screening Site 21. He then introduced Mr. Gene Burr of the Depot Redevelopment Corporation.


Mr. Burr said the City has moved the road project up on their priority list in order to bring Hayes Road up to code. If the City could not use part of Dunn Field, they would have to remove five houses. The City wants an area of Dunn Field 75 feet long by 70 feet wide. The DRC wants to look at a lease in furtherance of a conveyance to complete this City Public Works project. The City has surveyed the area, so the area can be delineated for the environmental condition of property procedure and to provide meets and bounds for a Finding of Suitability to Transfer (FOST).

The BCT asked if any sampling data was available for this area in order to make approve a FOST, and Mr. Underberg responded that there was. Mr. Phillips tasked Ms. Richards and Mr.


Underberg to submit the data to him within two weeks, and he will turn it around to Mr. Ballard and Mr. English. The BCT will review the data and bring it back to the table in July. Mr. Phillips reminded everyone that this was the same situation as the corridor road project and should be handled the same way. A question was raised about having to move a TVA tower and if any burial sites were identified in that area. Mr. Phillips indicated no burial sites have been identified in the TVA tower area and that if anything was encountered, the BCT would deal with it at that time.

Restoration Advisory Board Meeting


The RAB has requested a briefing on reuse plans and environmental condition of property category changes. Mr. Jim Covington of the Depot Redevelopment Corporation has agreed to present the reuse plan (in August). Mr. Phillips said he had asked a potential tenant, Barnhart Cranes, to provide the RAB a briefing of their plans at the July meeting. He also suggested briefings regarding the CERFA environmental condition of property (ECP) decision process and an ECP update also be prepared for July to coincide with the DRC's briefing (the ECP process, ECP update and DRC update have since been rescheduled for August as Mr. Covington will be unavailable in July).


SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator

7/23/99
DATE


TURPIN BALLARD
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager

8/19/99
DATE


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

7/23/99
DATE

Existing/Open Action Items	Responsibility	Start - Suspense Date	Completed Date
Discuss with headquarters: if lease in furtherance of conveyance contains lease restrictions/land use controls, can these be accepted as evidence of implementation of a remedial action in order to change the environmental condition of property category for a parcel.	Turpin Ballard	6/17/99 - ASAP	
Kurt Braun, Greg Underberg and Steve Offner identify optimum placement of proposed offsite recovery wells.	Kurt Braun, Greg Underberg, Steve Offner	6/17/99 - 7/23/99	
Coordinate Belz Properties to obtain appropriate access agreements to install monitoring wells in Rozelle neighborhood west of Dunn Field.	Shawn Phillips/Received agreement signed by Belz Properties and forwarded to DDSP for signature	6/17/99	8/12/99
In October 1999, have USGS prepare an information package.	Turpin Ballard	6/17/99 - 10/15/99	
Write additional option year into Dunn Field Groundwater System O&M contract to include monitoring water levels beginning October 1999.	Kurt Braun	6/17/99 - ASAP	
Receive summary of action verbiage and forward Dunn Field Groundwater Action Report to EPA and TDEC.	Shawn Phillips	6/7/99 - 7/27/99	
Provide Depot letter regarding delay on CWM removal action schedule based on Spring Valley schedule.	Steve Dunn	6/17/99 - 7/23/99	

Submit to BCT for review and comment draft final Main Installation RI including all functional units.	Hill/CEHNC	1998 - 9/19/99	
Seek resolution to question of institutional controls and land-use restrictions in definition of remedial action in DoD's and EPA's environmental condition of property definitions.	Turpin Ballard John DeBack	5/20/99 - 6/17/99	
Prepare Action Memorandum and "bridging" document for removal action at Family Housing.	Depot	3/18/99 - 4/15/99	
Modify "comfort letter" regarding status of proposed no further action sites and provide to DRC.	Depot	When needed	
Provide comments on draft EE/CA Removal of Hot Spot Areas, Main Installation.	Depot, EPA, TDEC	On hold pending RI	

FINAL PAGE

ADMINISTRATIVE RECORD

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