



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 565

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C.H. 565
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BRAC Cleanup Team

Meeting Minutes

July 15, 1999

Attendees

565

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Name	Organization	Phone
Stanley Tyler	RAB Member	(901) 942-0329
Shawn Phillips	Depot	(901) 544-0611
Jordan English	TDEC-DSF	(901) 368-7953
Turpin Ballard	EPA Region IV	(404) 562-8553
Brian Deeken	TDEC-DSF	(901) 368-7955
Ed Hares	TDEC-DSF	(901) 368-7957
John DeBack	Depot	(901) 544-0622
Denise K. Cooper	Depot	(901) 544-0610
Jack Kallal	Depot	(901) 544-0614
Mike Lee	Depot	(901) 544-0612
Karen Moran	DLA	(703) 767-6237
Dorothy Richards	CEHNC PM-ED	(256) 895-1463
Scott Bradley	CEHNC	(256) 895-1637
Steve Dunn	CEHNC	(256) 895-1144
Kurt Braun	CESAM	(334) 690-3415
Neal Anderson	CESAM	(901) 686-6195
Greg Underberg	CH2M Hill	(423) 483-9032
Dan Marion	CH2M Hill	(770) 604-9182
Terry Flynn	Frontline	(888) 848-9898
Allison Langley	Barnhart Crane & Rigging Co.	(901) 775-3000

Review of Previous Meeting Minutes

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

Review of Project Status*Dunn Field Remedial Investigation*

Mr. Greg Underberg indicated that work on the document continues. But, Mr. Underberg added that the data from the Belz property monitoring well and the chemical warfare materiel removal action excavation confirmation samples will not be available by the document

submittal date. The BCT agreed that CH2M Hill continue with the document per the schedule and amend it when the data was received.

Engineering Evaluation/Cost Analysis for the Old Paint Shop and Maintenance Area

Ms. Denise Cooper provided the BCT with comments and questions on this EE/CA gleaned from the May 20 public comment meeting transcript and received in the mail. Mr. Ballard suggested the comments be annotated to indicate which agency should assist the Depot in responding, but to send all the comments to the supporting agencies. Mr. Ballard also suggested specifying the contaminants of concern at the Old Paint Shop and Maintenance Area for comments related to illnesses and effects of chemicals on health.

Ms. Cooper indicated she would email the annotated comments on Friday, July 16. Mr. Phillips indicated all responses would come to the Depot and the Depot would prepare the Responsiveness Summary. Mr. Phillips indicated he had received a suggestion to reference the response the agency that provided the response or provided assistance with the response.

Main Installation Remedial Investigation

Mr. Underberg reported that CH2M Hill was working review comments on the draft Main Installation Remedial Investigation (Functional Units 3 and 7) document received to date. Mr. Jordan English indicated he would email Dr. Chen's risk assessment comments to the Depot on Monday, July 19 and email his office's comments by Friday, July 23, with a hard copy of the formal TDEC comments to follow. Mr. Shawn Phillips indicated CH2M Hill would provide responses to the formal TDEC comments only.

Due to several scheduling issues, Mr. Phillips and Ms. Dorothy Richards suggested moving the submittal date for the draft final Main Installation Remedial Investigation (all 7 Functional Units) for regulator review to September 20 from its original date of August 20. Reviewers would have 60-days to provide comments (November 19), and the draft final Main Installation Feasibility Study would remain on schedule. The final Main Installation Remedial Investigation would be submitted on January 7, 2000. The BCT agreed to this schedule change.

U.S. Geologic Survey Comments on the Main Installation Remedial Investigation

Mr. Dan Marion reported that he was responding to comments received from the U.S. Geologic Survey (USGS) and that were no show stoppers. To the question of natural attenuation as a solution for contamination in the groundwater at the Main Installation, Mr. Marion indicated that when the data was first received natural attenuation appeared to be a viable option. He looked at but did not use all of EPA protocols or Mr. Tom Bile's parameters, but did he select protocols/parameters that would show if natural attenuation was a viable option at the Main Installation using available data. Mr. Underberg added that CH2M Hill did not do a complete natural attenuation study but simply assessed its application based on available data. After analyzing the data using the selected protocols/parameters, natural attenuation did not appear to be a viable solution for groundwater contamination at the Main Installation.

Mr. Marion continued that even after incorporating USGS's comments such as adding isomers and using certain ratios the data did not provide compelling evidence that natural attenuation would be feasible at the Main Installation. Did the available data provide sufficient evidence to support proceeding through a complete natural attenuation study? Mr. Marion replied that the evidence did not support a complete study, but that the data did provide enough evidence to say that natural attenuation was not a viable solution at the Main Installation.

Mr. Jordan English asked if there was enough available data to support biodegradation? He continued that a pump and treat system for low-level contamination in the groundwater at the Main Installation may not be a feasible option, so the discussion may come back to natural attenuation and biodegradation. Mr. Marion and Mr. Underberg agreed that CH2M Hill can suggest options in the Main Installation Feasibility Study such as injecting naturally-occurring bacteria into the groundwater to enhance natural attenuation and biodegradation.

Mr. Turpin Ballard suggested that CH2M Hill provide him with draft responses and he will forward the responses to Mr. David Ladd and Mr. Bile of USGS. CH2M Hill can then discuss the issue directly with USGS to resolve the comments. If the comments cannot be resolved that way, then CH2M Hill should bring the issue back to the BCT. Ms. Richards suggested CH2M Hill include Mr. Chris King on the discussions. CH2M Hill will provide draft responses to USGS's comments by Friday, July 23.

Golf Course Risk Values

Mr. English reported that he had discussed the 10^{-5} risk factor with his headquarters and that they had no problem with the number due to the conservative risk assessment approach.

Dunn Field Chemical Warfare Materiel Removal Action

Mr. Steve Dunn indicated he had discussed the issue of hazardous, toxic, radiological waste (HTRW) sampling in the CWM removal action excavations with UXB International and Technical Escort Unit (TEU). Once TEU has determined all CWM has been removed, CH2M Hill can come in and collect samples. UXB's workplan will note that this sampling will occur. Mr. Ballard reminded Mr. Underberg that the Quality Assurance and Protection Plan should be amended to reflect this sampling effort.

Mr. Dunn provided a draft letter providing responses from the Program Manager for Non-Stockpile Chemical Materiel (PMNSCM) to Mr. English's concerns regarding timeliness of transporting recovered-CWM from the Interim Holding Facility to the ultimate disposal facility and the communication chain to notify the governor that the recovered-CWM was being transported.

Mr. Stanley Tyler asked if the flight plan would be available for public review. Mr. Dunn would ask PMNSCM about the flight plan. Mr. Tyler also asked if the Interim Holding Facility was suitable to store recovered-CWM. Mr. Dunn and Mr. Phillips both responded that the facility was specifically designed and approved by PMNSCM for the purpose of storing recovered-CWM until transportation to the ultimate disposal facility. Mr. Tyler also suggested that any fact sheet concerning this removal action include 1-800 telephone numbers for all the agencies involved.

Mr. Dunn continued the discussion by asking if the submittal date for the draft Action Memorandum/Record of Decision should be delayed since the public comment period was extended until August 9. Mr. Ballard suggested that the regulators should be reviewing the decision document and working any issues until the public comment ended. Then, the BCT could look at the public comments and determine if any changes were required of the decision documents. Mr. Dunn indicated he would provide Mr. Phillips the decision document schedule on Friday, July 16 via email.

Mr. Ballard clarified for Mr. Dunn one of EPA's EE/CA comments regarding environmental ordinances. He suggested that the contractor only reference ordinances that applied to this specific project such as monitoring well installation approval. Mr. Phillips suggested Mr. Dunn coordinate with Mr. Mike Lee on local ordinances specific to this removal action.

Additional Recovery/Monitoring Wells

Mr. Phillips indicated he had spoken with Mr. Garland Crawford and had obtained permission to install two monitoring wells in the Rozelle neighborhood, which is also Belz property.

Mr. Underberg reported that Boart-Longyear had mobilized to install the monitoring well on the Belz property to determine characteristics of the geological trough, but encountered problems accessing the site. The well location was moved south of the original location and drilling started. The drillers reached a clay layer and went 30 feet into the layer at which point drilling stopped. Mr. Jack Carmichael, USGS, was with the drill team at the time.

Mr. Underberg said there was very little water above the clay and that the well should be moved to the north. A portion of the ravine that posed the site access problem would have to be knocked down to gain access. The monitoring well needs to go into the lower sand aquifer to look for 1,1,2,2-PCA and to provide data on the geological trough to determine if it provides a pathway for fluvial aquifer contamination to reach the lower sands aquifer. He indicated that the driller demobilized in order to start their scheduled Millington job and that he would continue to coordinate the next drilling opportunity. Mr. Phillips indicated he had spoken with Mr. Crawford about the need to move the well and had received permission to work directly with the Belz Properties tenant regarding access.

CH2M Hill had submitted the recovery well design to the Corps. Mr. Underberg commented that he was using the TSAN model to plot the recovery well locations. He needs to coordinate with the Corps on the model.

Frontline Focus Group Report

Mr. Terry Flynn provided the results of focus groups and telephone surveys conducted over the past month. Four focus groups were conducted, but the results of one focus group were not used because the contractor had not selected people for the proper zip code. Five hundred telephone surveys were conducted at residences within 3 miles of the Depot with 250 conducted at residence within 1 mile of the Depot.

This effort indicated the community has the following perceptions:

- Positive efforts were taking place;
- Increased awareness of activities at the Depot;
- Pace of cleanup too slow and not visible;
- Confusion between Depot environmental cleanup activities and Depot Redevelopment Corporation activities;
- Increased awareness of Restoration Advisory Board and Ms. Alma Moore;
- Decreased trust of all groups associated with the Depot (EPA, local community groups, ATSDR);
- Desire to see more community input to the EnviroNews (such as Q&As from local residents);
- Most received information from the television and not from local newspapers; and
- Less is actually being done because the grass is not being kept as it was in the past.

Mr. Flynn will continue preparing the final report and provide it to the Depot. Mr. English asked if this effort was something new or was it identified in the Community Relations Plan. Mr. Flynn indicated it was identified in the CRP and that it was needed to monitor the effectiveness of the community relations program. Mr. English voiced concern that trust was

down even though awareness increased. Mr. Flynn explained that people have become aware and are wondering why they hadn't been informed about the situation before thus pushing their level of trust down. With continued community relations activities aimed at getting more information to the community, Mr. Flynn believed trust would increase.

Property Transfer and Land Use Control Issues

Mr. Ballard discussed with his headquarters the Department of Interior park property transfer law and its applicability to the Depot's Golf Course. Headquarters indicated it would apply. But the issue of contaminated groundwater under the Golf Course parcel remained, and headquarters had reiterated that the parcel could not be divided horizontally to facilitate transfer.

Mr. Ballard continued that EPA considered land use controls as remedial actions per CERCLA and that parcels could change environmental condition of property categories based on land use controls being written into transfer documentation and lease in furtherance of conveyance documentation. He suggested that Mr. Phillips continue to work the issue of environmental condition of property categories with the Army as they appear opposed to changing categories based on land use controls. Mr. Phillips indicated that the Department of Defense had prepared guidance regarding land use controls and property transfer. Mr. Phillips will provide the BCT and Mr. Tyler with the Internet address where the guidance can be found.

Barnhart Crane and Rigging Co.

Mr. Allison Langley talked with the BCT about Barnhart's plans to move a portion of their business to the Depot via a lease with the Depot Redevelopment Corporation. Barnhart plans on refitting Building 925 for a shop and adding an administration/office section. The company plans on using the sand blast facility and the paint booth for the same purpose. Mr. Tyler asked if they had to comply with environmental regulations to use the buildings and if the buildings were suitable for those purposes. Mr. Langley responded that the company would obtain the proper air permits and would upgrade the facilities to meet air permit requirements, if necessary.

Mr. Langley continued that Building 1084 would not be used. He then asked if there were any environmental restrictions associated with removal of the rail lines. Barnhart will first try to sell the scrap metal and the ties, but was unsure if there were any buyers. Mr. Ballard indicated that the ties would have to be sampled in order to dispose of them because they were treated with creosote. Mr. Underberg indicated that poly aromatic hydrocarbons had been detected in the ballasts along the rail lines and to be aware of that during removal operations.

Mr. Ballard asked if Barnhart planned on excavating any areas. Mr. Langley indicated they would excavate to build a footing for the big crane in the former open storage areas and they would excavate to install an oil/water separator at Building 925.

City of Memphis Hays Road Widening Project

Mr. Phillips informed the BCT that Mr. Gene Burr of the Depot Redevelopment Corporation had the survey for the property required for the Hays Road widening project. Mr. Phillips would prepare and provide EPA and TDEC with a letter creating a new parcel.

No Further Action Document

Mr. English felt the document was not needed at this time and had moved it down on his regulatory review priority list. Mr. Phillips indicated the document was necessary for him to delete sites from his tracking/reporting system. Mr. Ballard suggested the document could be used in the final Record of Decision to quickly dispense with the sites by referencing the document. Mr. English and Mr. Ballard voiced the opinion that the document appeared to be a Record of Decision and should be reformatted as a technical memorandum. Mr. Underberg will reformat the document. Mr. Ballard suggested the Depot then prepare and provide a letter with the technical memorandum requesting EPA and TDEC concur that no further action is required at the sites.

Restoration Advisory Board Meeting/Community Relations Activities


Mr. Phillips requested the BCT's approval to conduct a CWM Removal Action-specific Availability Session 6-weeks to 2-months before field work began. The BCT agreed.

Mr. Phillips informed the BCT that the National Congress of Black Churches had requested the BCT come speak with them in August or September about environmental cleanup at the Depot. The BCT agreed and suggested the meeting be scheduled around the August BCT and RAB meeting, perhaps Wednesday, August 18. Ms. Moore will coordinate this briefing.

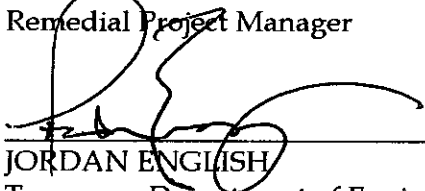
In discussing Dr. Ted Simon's risk assessment training for the RAB, Mr. Flynn suggested the session be scheduled for January or February to coincide with submittal of the Final Main Installation Remedial Investigation report. Mr. Phillips agreed to ask the RAB when and how they would like to receive the training.


SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator

8/19/99
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

8/19/99
DATE

July Action Items	Responsibility	Start - Suspense Date	Completed Date
Prepare and submit to the BCT a QAPP addendum regarding the HTRW confirmatory sampling at the CWM/OE excavation.	Greg Underberg	7/17/99 - 11/99	
Prepare and submit to EPA and TDEC a letter creating a new parcel at Dunn Field for the City's Hayes Road expansion project.	Shawn Phillips	7/15/99 - 8/19/99	
Reformat draft Basis for No Further Action document as a technical memo.	Greg Underberg	7/15/99 - 8/19/99	
Prepare and submit to EPA and TDEC a letter requesting concurrence on the No Further Action sites.	Shawn Phillips	7/15/99 - 8/26/99	
Finalize community relations survey/focus group report and provide to the Depot.	Terry Flynn	7/15/99 - 7/30/99	
Provide Depot via email the submittal date for the CWM Removal Action Memorandum.	Steve Dunn	7/15/99 - 7/16/99	7/16/99
Provide public comments on the Parcels 35 and 28 EE/CA and request input from other agencies or organizations.	Denise Cooper	7/15/99 - 7/16/99	7/19/99
Provide draft response to USGS's comments on the Main Installation RI.	Greg Underberg/Dan Marion	7/15/99 - 7/23/99	7/26/99
If necessary, complete conference call to David Ladd, USGS, regarding comment responses (David Ladd approved comment responses.)	Dan Marion	7/15/99 - 7/30/99	8/13/99

Provide rough draft of Dr. Chen's comments on the Main Installation RI via fax to CH2M Hill (G. Underberg).	Jordan English/Brian Deeken	7/15/99 - 7/19/99	7/19/99
Provide complete formal comments on Main Installation RI via email to the Depot.	Jordan English/Ed Hares	7/15/99 - 7/23/99	7/23/99
Provide cover letter to CH2M Hill submitting the draft final Main Installation RI to EPA and TDEC.	Shawn Phillips/Denise Cooper	7/15/99 - 9/13/99	
Submit draft final Main Installation RI directly to BCT for 60-day review.	Greg Underberg	7/15/99 - 9/20/99	
Produce and submit revised IRP schedule to the BCT.	Shawn Phillips	7/15/99 - 8/19/99	
Provide web site address for DoD's land use controls interim guidance to BCT/Stanley Tyler.	Shawn Phillips	7/15/99 - 7/16/99	7/16/99
Coordinate meeting with National Congress of Black Churches for Wednesday, August 18.	Alma Moore	7/15/99 - Still working	

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