



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 578

578 1

BRAC Cleanup Team

Meeting Minutes

December 15, 1999

Attendees

| Name | Organization | Phone |
|------------------|--------------------|----------------|
| Shawn Phillips | Depot | (901) 544-0611 |
| Jordan English | TDEC-DSF | (901) 368-7953 |
| Turpin Ballard | EPA Region IV | (404) 562-8553 |
| Denise K. Cooper | Depot | (901) 544-0610 |
| Scott Bradley | CEHNC | (256) 895-1637 |
| Kurt Braun | COEMDO | (334) 690-3415 |
| Greg Underberg | CH2M Hill | (423) 483-9032 |
| Srini Dasappa | CH2M Hill/ Atlanta | (770) 604-9182 |

Review of Previous Meeting Minutes

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

Review of Open Action Items

The BCT and project team reviewed the action item list. The attached action item list provides updates or completion dates to the existing action items and provides action items from the December BCT meeting.

Review of Project Status

Interim Remedial Action for Groundwater Phase IIA - Additional Onsite Recovery Wells

Mr. Kurt Braun said that Sverdrup was to provide the cost proposal to install the piping system for the newly installed recovery wells in January, and that he anticipated Sverdrup would mobilize in March 2000.

Old Paint Shop and Maintenance Area Removal Action

Mr. Braun distributed to the BCT the removal action project scheduled that the Corps had negotiated with Sverdrup. He indicated the correct date for the work plan to be distributed to the BCT for review was January 15, 2000, with comments/approval to be received by February 15, 2000. The schedule indicates Sverdrup will mobilize near the end of March 2000.

Dunn Field Remedial Investigation/Feasibility Study

Mr. Greg Underberg requested a status of comments on the draft Dunn Field RI Report. Mr. Jordan English indicated his office had finished reviewing the document and was working to prepare comments. But, he would be unable to provide comments by December 17, 1999. The BCT and the Corps agreed to extend the comment due date to January 11, 2000. Mr. Underberg and Ms. Denise Cooper will discuss distribution of the draft final Dunn Field RI Report at a later date.

Mr. Srini Dasappa distributed a technical memorandum regarding the scope of the Dunn Field Feasibility Study and requested BCT approval of the FS procedures, risk drivers, and proposed remedial technologies. A risk driver for subsurface soil was lead bullets. CH2M Hill indicated that the Depot could conduct a non-time critical removal action to remove the bullets if the Depot desired expedited release of Dunn Field's northeast corner. The BCT disagreed because there was neither an imminent health/environmental threat nor a property transfer time driver for Dunn Field. The BCT indicated the suggestion to remove the bullets should be justified qualitatively in the FS and be included in the ROD.

VOCs were the risk drivers in groundwater. Mr. Dasappa indicated that the levels were such that wells for industrial or residential use should not be placed in the fluvial aquifer. The BCT requested Mr. Dasappa fully define the "around acceptable range" statement in the technical memorandum to say whether the VOC levels were above or below acceptable levels.

Mr. English mentioned the new Tennessee groundwater classification rule that may impact the natural attenuation alternative presented in the technical memorandum. The BCT discussed the new rule as it related to remedial goals and active remediation of the offsite plume. The BCT determined that the FS should address the offsite plume in light of this new rule. Mr. English will provide the BCT and CH2M Hill with a copy of the new rule.

The BCT reviewed the retained technologies section in the technical memorandum. Mr. English and Mr. Shawn Phillips requested more information in the screening column to include better explanations for why some technologies were deleted. Mr. Dasappa recorded specific comments to be included in the FS. The BCT approved of the retained technologies as presented in the technical memorandum.

Offsite Dunn Field Plume Technical Memorandum

Mr. Underberg provided the BCT with a technical memorandum with the results of CH2M Hill's calculations for the worst case scenario of the entire offsite contamination plume mass entering the Memphis aquifer and other confined aquifers at one location. Mr. Underberg indicated the technical memorandum provided the most conservative scenario – all the offsite contamination mass entering the Memphis aquifer through one location over a 3.5- to 4-year period and then entering one Allen Well Field production well. The BCT indicated the technical memorandum provided a very, very conservative view and that a more realistic worst case scenario was needed for decision making and for the FS.

Mr. Ballard said he wanted to obtain some concrete assumptions from Mr. David Ladd of the U S. Geologic Survey (USGS) to use instead of CH2M Hill's modeling approach. Mr. Underberg suggested a reduction factor table be prepared and applied to the technical memorandum figures. Mr. Ballard agreed with this approach and indicated that CH2M Hill consult EPA's natural attenuation guidance to identify processes that were not included in the conservative calculations. Mr. Underberg proposed that these processes be addressed in a semi-quantitative manner in the table. Mr. Phillips wanted CH2M Hill to obtain comments from USGS regarding the use of a reduction factor table that would be the most defensible and most reasonable for use in a cascade effect.

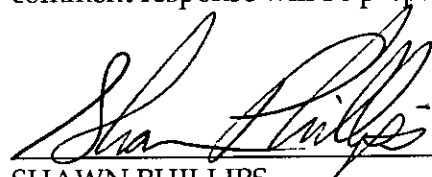
The BCT agreed that CH2M Hill should obtain written comments on the technical memorandum from EPA, TDEC and USGS by January 7, 2000. CH2M Hill would then introduce a more realistic migration rate and a more realistic worst-case scenario in the draft final Dunn Field RI groundwater fate and transport section. The BCT provided verbal comments that the scenario presented was overly conservative. Mr. English requested the more

realistic worst-case scenario include the TCE plume off the northeast corner that appears to originate from an offsite source. Mr. Underberg said he would also include a statement that the TCE plume was suspected to originate from an offsite source.

Main Installation Remedial Investigation/Feasibility Study

Mr. Underberg reported that the BCT would receive the comment response package for the Main Installation Remedial Investigation Report on December 21, 1999. He requested the BCT respond to the comment response package by the second week of January. Mr. Underberg said CH2M Hill would begin contacting the BCT members the week of January 3 to gather feedback on the comment response package. The BCT approved the Corps request to delay distribution of the final Main Installation Remedial Investigation Report until January 31, 2000. If the BCT identifies a comment response issue after distribution of the final, the change will be published via errata pages.

Mr. Ballard said he had conducted a teleconference with Dr. Ted Simon and CH2M Hill regarding EPA's comments on the ecological risk assessment at the Golf Course and CH2M Hill's responses. The dieldrin level that concerned Dr. Simon was determined to have been from a sample collected in an area where stormwater collected and was an outlier, so Dr. Simon's comment was resolved. Mr. Phillips and Mr. Underberg discussed the sample collection point and determined it was not in a natural stormwater collection area. Mr. Ballard indicated the comment in question was now unresolved. Mr. Underberg indicated he would inform the person working the comment responses that it would not be appropriate to base the outlier on the sample being collected from a natural stormwater collection area. A new comment response will be prepared.



SHAWN PHILLIPS

Memphis Depot Caretaker
BRAC Environmental Coordinator

1/20/00

DATE

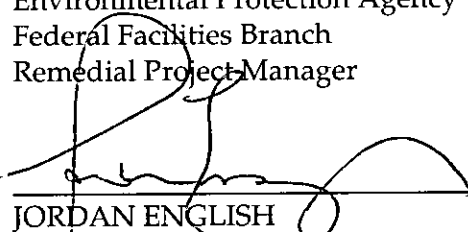


TURPIN BALLARD

Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager

1/20/00

DATE



JORDAN ENGLISH

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

1/20/00

DATE

| December Action Items | Responsibility | Start - Suspend Date | Completed Date |
|--|---|---|------------------------------|
| Provide comments on the draft Dunn Field RI. | Turpin Ballard/Jordan English/ Shawn Phillips | 1/11/00 | EPA 12/17/99 Depot 1/3/00 |
| Provide BCT/CH2M Hill with new TN groundwater classification rule | Jordan English | 12/15/99 - ASAP | |
| Obtain comments from USGS regarding use of a reduction factor table for use in Dunn Field "worst case scenario" calculations | Dorothy Richards/Greg Underberg | 12/15/99 - ASAP | |
| Provide written comments on the Offsite Dunn Field Plume Technical Memorandum to Depot/CH2M Hill. | Turpin Ballard/Jordan English/ Shawn Phillips | 12/15/99 - 1/7/00 | 1/7/00 |
| Provide to BCT draft final Main Installation RI comment response packages BCT provide response to CH2M Hill | Dorothy Richards/Greg Underberg Turpin Ballard/Jordan English/ Shawn Phillips | 12/15/99 - 12/21/99 12/15/99 - 1/10/00 | 12/21/99 1/10/00 |
| Discuss distribution list for MI RI. | Denise Cooper Dorothy Richards/Greg Underberg | 12/15/99 - 1/21/00 | |
| Provide cover letter for final MI RI to include, if appropriate, location of comment responses Distribute final MI RI | Shawn Phillips/Denise Cooper Dorothy Richards/Greg Underberg | 12/15/99 - 1/21/00 12/15/99 - 1/31/00 | |

| Existing/Open Action Items | Responsibility | Start - Suspense Date | Completed Date |
|---|---|---|--|
| Install recovery well discharge piping system and have on line | Kurt Braun/Virgil Jensen | 10/25/99 - 5/4/00 (or upon initiation of CWM project) | |
| Provide Mobile (Kurt Braun) with all available SOPs that have already been approved by BCT | Dorothy Richards/Greg Underberg | 10/25/99 - ASAP | |
| Update QAPP with new table and make available to Mobile on Hill website. | Dorothy Richards/Greg Underberg | 10/25/99 - ASAP | |
| Prepare letter to DRC regarding environmental protection provisions and tenants Provide copy to RAB. | Shawn Phillips | 10/25/99 - 1/20/99 | |
| Provide to BCT in document comment response packages the current page numbers where corrections can be found. | Dorothy Richards/Greg Underberg | 10/25/99 - As required. | |
| Provide cover letter for draft final documents and include where the comment responses can be found | Shawn Phillips/Denise Cooper | 10/25/99 - As required | |
| Review Industrial Wastewater Discharge Agreement to determine need to notify city of anticipated increased flow from additional wells. | Shawn Phillips | 9/16/99 - Pending | |
| Purchase and install 6 transducers Four will take place of USGS transducers currently in place. USGS contract with EPA to collect data from current transducers ends this 9/30/99 | Kurt Braun/Steve Offner/Greg Underberg (UATO – upon award of task order) estimated award 10/29/99 | 9/16/99 - UATO | Funds request submitted 10/19/99 |
| Provide directly to BCT the safety plan for overall PRAC. | Kurt Braun/Charlie Riggs (UATO- Upon award of task order) | UATO (estimated 11/24/99) - | |

| | | | |
|---|--------------------------|--|--|
| | | 1/14/00 | |
| Provide directly to BCT the work plan for Parcels 35 and 28 removal action | Kurt Braun/Charlie Riggs | UATO (estimated 11/24/99) - 1/14/00 | |
| Provide final SSS to BCT members. | Steve Dunn/Randy Reed | 9/16/99 - 1/30/00 (12/99) | |
| Send letter to Memphis Sanitary Sewer division regarding the anticipated additional flow from the additional monitoring wells | Shawn Phillips | 8/19/99 - Pending | |
| Prepare and submit to the BCT a QAPP addendum regarding the HTRW confirmatory sampling at the CWM/OE excavation | Greg Underberg | 7/17/99 - ASAP | |
| Coordinate meeting with National Congress of Black Churches | Alma Moore | 7/15/99 - Pending | |
| Have USGS prepare an information package | Turpin Ballard | 6/17/99 - Pending | |
| Prepare Action Memorandum and "bridging" document for removal action at Family Housing | Depot | 3/18/99 - Pending | |
| Provide comments on draft EE/CA Removal of Hot Spot Areas, Main Installation. | Depot, EPA, TDEC | On hold pending RI | |

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE