

THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 583

FINAL
BRAC Cleanup Team
Meeting Minutes
February 17, 2000

Attendees

Name	Organization	Phone
Shawn Phillips	Depot	(901) 544-0611
Turpin Ballard	EPA Region IV	(404) 562-8553
Jordan English	TDEC-DSF	(901) 368-7953
Stanley Tyler	RAB Member	(901) 448-5661
Jim Morrison	TDEC-DSF	(901) 368-7958
Brian Deeken	TDEC-DSF	(901) 368-7955
Denise K. Cooper	Depot	(901) 544-0610
Jack Kallal	Depot	(901) 544-0614
Dorothy Richards	Corps, Huntsville	(256) 895-1463
Steve Dunn	Corps, Huntsville (OE)	(256) 895-1144
Wilson Walters	Corps, Huntsville (OE)	
Kurt Braun	Corps, Mobile	(334) 690-3415
Neil Anderson	Corps, Arnold AFB	(901) 686-6195
Greg Underberg	CH2M Hill	(423) 483-9032

Review of Previous Meeting Minutes

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

Open Action Items Review

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 February BCT meeting.

Project Status Review***Interim Remedial Action for Groundwater Phase IIA - Additional Onsite Recovery Wells***

Mr. Kurt Braun indicated the request for proposal to install the piping system would be sent to Sverdrup on February 24 with a projected award date of March 24. Work would begin around April 24. Mr. Braun reiterated that he and Sverdrup would continue to coordinate the piping installation project with the CWM removal action team, specifically Mr. Steve Dunn, Mr. Wilson Walters and UXB International.

Old Paint Shop and Maintenance Area Removal Action

The BCT received the work plan on January 21, but the 30-day review period did not begin until February 9 upon receipt of materials referenced in the work plan. Mr. Braun suggested the BCT concentrate their review on the sampling plan portion of the work plan.

CWM Removal Action at Dunn Field

Mr. Steve Dunn reported that slip-sheets for the final Site Safety Submission were distributed to the BCT on January 28, 2000. The final SSS is now at the U.S. Army Technical Center for Explosives Safety (USATCES), which is the first step in the Department of Army review process. The document must also go through review by the Department of Health and Human Services. Mobilization for non-intrusive work is on schedule to begin in March.

Mr. Shawn Phillips discussed with BCT need to place the SSS in the Depot's Information Repositories (IR) before receiving final DA and DHHS approval as it may not be received until immediately before start of intrusive work. Mr. Dunn indicated the Corps, Huntsville, had no objection to this provided a cover letter addressing the possibility of changes to the document resulting from the DA and DHHS review. The BCT also agreed that the Depot should make the document available at the IRs as soon as possible.

Mr. Dunn requested a short delay before placing the SSS in the IRs to determine if USATCES would have any comments that would result in a change to the document. Mr. Dunn indicated after USATCES' review, he did not anticipate any further comments that would significantly change the document. Mr. Phillips directed Mr. Dunn to facilitate and incorporate any USATCES comments by February 29 and to provide two copies of the resulting errata sheets to the Depot. If Mr. Dunn does not receive comments, or if no changes are necessary, by February 29, then the Depot will proceed and place the SSS with the appropriate cover letter in the IRs.

Mr. Dunn continued that the Corps was awaiting the non-intrusive safety plan from UXB. Once that safety plan was approved, then work could begin. Mr. Phillips then turned the discussion to answering the questions: 1) If the CWM excavation removes all contamination sources including hazardous waste, then how is that information rolled into the Dunn Field Remedial Investigation Report; 2) If the CWM excavation does not also remove a hazardous waste source, then how does the project roll over to the remedial action contractor, Sverdrup.

Mr. Greg Underberg indicated he had discussed the situation with Mr. Randy Reed of UXB International and that UXB would collect the samples based on CH2M Hill's plans. Mr. Underberg will distribute to the BCT on February 25, 2000, the Quality Assurance Project Plan addendum to include a sampling plan for the hazardous waste samples to be collected for remedial investigation purposes.

The BCT then discussed the decision chain to determine the need for further excavation to remove hazardous waste sources identified by the hazardous waste sampling. Mr. Wilson Walters indicated that UXB would not continue the excavation to remove hazardous waste sources, but they could leave the excavations open and protected from rain. Mr. Braun responded that Sverdrup could be prepared to continue the excavation but would require a short hazardous waste removal work plan from CH2M Hill.

Mr. Phillips wondered if a record of decision would be required if sample results indicated a hazardous waste source that should be removed. Mr. Turpin Ballard suggested that the Depot could make the case for a time critical removal because of the safety hazard presented by open

excavations. He also suggested that the decision chain include definite guidelines regarding sampling results and balance the cost of removal versus another remedial alternative such as soil vapor extraction.

The BCT then discussed several quick-turn around sampling and analysis methods as well as the safety issues presented by leaving the excavations open. Mr. Phillips directed Mr. Underberg to prepare a sampling plan to include a decision tree and distribute to the BCT by February 25, 2000, for review.

Dunn Field Remedial Investigation/Feasibility Study

Mr. Greg Underberg provided the BCT with the updated document review schedule that changed due to regulator comments and need to collect additional groundwater data for use in monitored natural attenuation (MNA) discussion. The BCT discussed several issues regarding the schedule, BCT review and approval of MNA data, incorporation of MNA data into the Dunn Field Feasibility Study (FS). Mr. Underberg will address this scheduling issue and resubmit the document review schedule by February 25 via email to the BCT. The BCT approved February 8, 2001, as the submittal date on the document review schedule for the final record of decision for Dunn Field.

Mr. Underberg distributed a draft technical memorandum (TM) regarding the groundwater monitored natural attenuation (MNA) treatability study. He also provided the draft TM to the U.S. Geologic Survey (USGS) for review and comment by February 22. Mr. Underberg asked Mr. Ballard to ensure the draft TM was being reviewed by Dr. Tom Byl as it addressed his comments on the draft Dunn Field FS. Mr. Underberg notified the BCT that the groundwater sampling presented in the draft TM was scheduled to begin March 13. Mr. Phillips indicated the data quality objectives in the TM must include Dunn Field. Mr. Morrison requested, and Mr. Underberg will provide to him by February 18, 2000, updated monitoring well location figures. The BCT agreed to provide comments on the MNA TM to CH2M Hill by February 28, 2000.

Mr. Underberg also distributed a draft nature and extent chapter (Section 14.5) that will be included in the draft final Dunn Field RI scheduled to be distributed to the BCT for review on March 8, 2000. Mr. Ballard requested that Mr. Underberg overnight this section to USGS to assist in their review of the MNA TM. Mr. Ballard indicated he expected to see closed contours on the potentiometric surface figure if the existing pump and discharge system was pulling water that had flowed past the well back into the system. Mr. Underberg indicated the figure did not include data from the recently installed monitoring wells west of Dunn Field. Waterways Experiment Station will run the model again upon receipt of that data.

Mr. Braun indicated OHM/IT had another well to install, but they had not received permit approval from the city. The BCT discussed the situation, and Mr. Braun will work with OHM/IT to complete the well installation.

Mr. Phillips requested CH2M Hill prepare a recovery well report to document the effectiveness of the system. Per the Interim Record of Decision for Groundwater at Dunn Field, the system must contain the plume. The Depot must be able to document the system's effectiveness before preparing the final record of decision for Dunn Field. The report should include at least one quarter's worth of sampling data from the four newly installed recovery wells.

Will delay of the recovery well data delay the Dunn Field RI? Mr. Underberg presented draft Section 14.5 in order to document the decline in concentration levels at off-site monitoring wells

for the Dunn Field RI. The conclusion documented in draft Section 14.5 is that PCE, TCE and 1,1,2,2-Tetrachloroethane levels have decreased from pre-extraction levels anywhere from 7 to 10 times. Monitoring must continue in one particular monitoring well that now shows levels of 1,1,2,2-Tetrachloroethane. Levels in monitoring wells north of recovery well #3 also appear to be decreasing. Mr. Phillips reiterated that the Depot must show that contamination is being contained by the system. Mr. Underberg will need the new model for that. Mr. Underberg reported that the system discharge was meeting the city's pretreatment standards.

The BCT then discussed the remedial alternatives presented in the draft Dunn Field Feasibility Study. Mr. Phillips and Mr. Ballard said that they wanted to keep final remedial decisions for soils and groundwater together in the final record of decision for Dunn Field. Mr. Ballard questioned evaluating alternatives for groundwater that appeared to replace the pump and discharge system, and he noted that the evaluation of alternatives for groundwater should focus on the down-gradient portion of the plume. Mr. Phillips indicated he was expecting to see groundwater alternatives associated with the existing pump and discharge system such as turn the system off, do not change the system, or enhance the system.

Mr. Phillips then mentioned soil vapor extraction as a potential alternative for soils impacted by volatile organic compound vapors, but also wanted to see the feasibility of source removal as DLA and the Army would prefer an alternative that removed the source for property transfer reasons. Mr. Underberg responded that the soil vapor sampling was not intended to identify specific sources, but was to identify areas being impacted by soil vapors. The soil vapor extraction alternatives focused on remediating areas with the highest soil vapor concentrations as specific sources.

The discussion then turned to disposal locations at Dunn Field where solid waste, not hazardous waste, was disposed. The BCT agreed that the removal of solid waste disposal locations was not required under CERCLA and that the removal of the solid waste disposal locations would be a DLA decision and not a BCT decision. Mr. Phillips concluded this discussion by saying if there was no risk-based reason under CERCLA to remove the solid waste disposal locations, then the Army must come to understand that not all the Dunn Field disposal locations will be removed.

Main Installation Remedial Investigation/Feasibility Study

Mr. Underberg reported that the final Main Installation Remedial Investigation Report was distributed on January 31, 2000. If the BCT identifies a comment response issue after distribution of the final, the change will be made via errata pages. Mr. Underberg also provided the BCT with the updated document review schedule that changed due to regulator comments and need to collect additional groundwater data for use in monitored natural attenuation (MNA) discussion. The BCT approved December 8, 2000, as the submittal date on the document review schedule for the final record of decision for the Main Installation.

Mr. Turpin Ballard indicated Dr. Ted Simon of EPA and Ms. Vijaya Mylavarapu of CH2M Hill had worked together to address his question from the January BCT meeting concerning the lead screening level for residential children used in the risk assessment. Dr. Simon and Ms. Mylavarapu lowered the risk-based concentrations from the IEUBK model for residential and industrial scenarios. Mr. Ballard noted that the revised risk assessment in the Main Installation Feasibility Study (FS) may indicated a more extensive remediation for lead in soils and may cause changes to the costs/areas to be removed in the FS.

Mr. Ballard also reported that he had discussed with his headquarters the issue of property zoning changes and any resulting additional required cleanup actions. If the Depot cleans up to industrial standards, then the zoning changes to residential, EPA will look to the organization they have a relationship with – DLA in this case – to remedy the situation. Mr. Ballard suggested that DLA ensure that the real estate transfer documents clearly state that DLA will delegate the cleanup responsibility to the current landowner. He continued that the land use control plan discussed in previous BCT meetings would be an agreement between EPA and DLA, and that real estate transfer documents were agreements between DLA and the perspective owner. He felt the question of responsibility and funding for any additionally required cleanup due to property zoning changes remained with DLA and DoD.

The BCT discussed cleanup alternatives for soils that should be included in the Main Installation FS. Mr. Phillips noted that DLA would prefer total removal as opposed to on-site treatment. He informed the BCT that he had scheduled an inspection with the TDEC underground storage tank (UST) division regarding an abandoned UST at Building 770. Removal of the UST and associated soils may become a maintenance issue instead of a CERCLA remedial action.

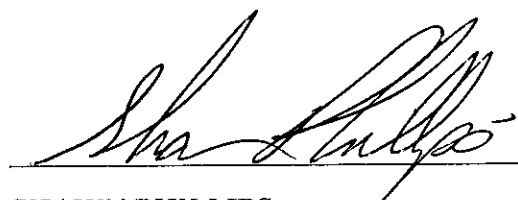
Mr. Jordan English voiced a concern about the risk assessment conclusion, as there may be a change in the intended reuse of the golf course to a day-use area. Mr. Phillips indicated the exposure scenarios used in the risk assessment were conservative enough to allow that change in intended reuse. Mr. Ballard suggested the BCT compare the UCL95 for children on the playground to the UCL95 for golfers. Mr. Underberg was tasked to prepare a technical memorandum comparing these values and to present it at the March BCT meeting. The technical memo should answer the question: "Does the risk assessment as it currently stands provide sufficient protection for children on the entire golf course."

Mr. Phillips reminded the BCT that if the comparison identified a problem with dieldrin levels on the golf course, then the BCT could turn to the bioremediation study as an alternative to bring levels down. Mr. Stanley Tyler told the BCT they would have to get the message out to the public that since the golf course presented a minimum of risk there was no need to take any action such as the bioremediation.

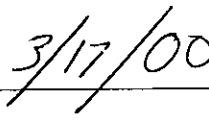
Upcoming Events

Mr. Phillips concluded the BCT meeting by reminding the BCT of upcoming chemical warfare materiel community relations activities on February 18, March 17 and March 18. He also reminded the BCT of the Agency for Toxic Substance and Disease Registry public comment meetings on February 24, 2000, regarding the Public Health Assessment for Defense Depot Memphis, Tennessee.

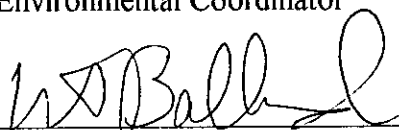
In preparation for the March 17 media day and project ribbon cutting, Mr. Phillips requested that CH2M Hill and the Corps, Huntsville and Mobile, ensure all drums, garbage, equipment that is no longer being used or is awaiting disposal be removed from Dunn Field. Mr. Underberg should move the drums of investigation derived waste currently being characterized for disposal purposes to the bermed pad at Building 860. Mr. Underberg, Mr. Braun and Mr. Dunn will report any problems removing debris from Dunn Field to Mr. Phillips by February 25, 2000. Mr. Phillips will ensure the sprinkler system pipe is removed.



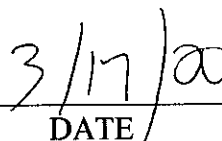
SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator




DATE



TURPIN BALLARD
Environmental Protection Agency, Region IV
Federal Facilities Branch
Remedial Project Manager



DATE



JIM MORRISON
Tennessee Department of Environment and Conservation
Memphis Field Office, Division of Superfund
Remedial Project Manager



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