

THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 605

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C.H. 605

FINAL

BRAC Cleanup Team

Meeting Minutes

September 21, 2000

Attendees on September 21, 2000

BRAC Cleanup Team	Organization	Phone
Shawn Phillips	Defense Logistics Agency/Memphis Depot Caretaker (Depot)	(901) 544-0617
Turpin Ballard	Environmental Protection Agency, Region IV (EPA)	(404) 562-8553
James Morrison	Tennessee Department of Environment and Conservation, Memphis Field Office, Division of Superfund (TDEC)	(901) 368-7958
Project Team		
John DeBack	Depot	(901) 544-0622
Denise K. Cooper	Depot	(901) 544-0610
Jack Kallal	Depot	(901) 544-0614
Dorothy Richards	Corps of Engineers	(256) 895-1463
John Rollyson	Corps of Engineers	(931) 455-6771
Peggy DuBray	Corps of Engineers	(931) 454-6630
John Whiting	Corps of Engineers	(334) 694-4216
Ken Shott	Corps of Engineers	(256) 426-0654
Richard Byrd	Corps of Engineers	
Stephen Offner	CH2M Hill	(770) 604-9182
Virgil Jansen	Jacobs/Sverdrup	(314) 770-4025
Kraig Smith	Jacobs/Sverdrup	(615) 331-9232

Review of Previous Meeting Minutes

The BCT postponed signing the August meeting minutes until after the meeting in order to discuss TDEC's comments. The BCT made no changes to the minutes and signed the minutes after the meeting.

Review of Project Status***Main Installation Pre-Design Work Plan***

The BCT concurred that in order for CH2M Hill to mobilize for the Main Installation pre-design field work, CH2M Hill must provide response to the BCT's work plan comments. Mr. Morrison indicated TDEC would provide comments on September 22.

Dunn Field Groundwater Pumping System

Mr. Turpin Ballard requested that the groundwater well operations and maintenance (O&M) plan be provided to the BCT on CD-ROM. Mr. Jim Morrison indicated the O&M plan should include the well management plan as it would be needed for the well abandonment plan and should include the well

inventory list. Mr. Steve Offner indicated that every well was being gauged during sampling, that O&M plan included the well inventory list, and that new wells would be incorporated into the well inventory list. Mr. Ballard suggested that they be incorporated through slip-sheets, and Mr. Offner agreed.

Mr. Virgil Jansen indicated they were on schedule to upgrade the recovery well pumps, but behind schedule on sampling along the proposed recovery well discharge piping trench, as they have not received BCT comments on the work plan or Corps of Engineers approval of the shop drawings. Without shop drawing approval, Mr. Jansen cannot purchase the equipment. Mr. Rollyson indicated the Corps of Engineers had sent the comments to Sverdrup.

Mr. Morrison asked if the BCT would receive response to comments before sampling began and indicated TDEC would provide comments on September 22. From the August BCT meeting, Mr. Jansen understood that sampling did not require BCT approval. Mr. Jansen indicated he would provide comment responses to Mr. John Rollyson on September 29, and Mr. Rollyson indicated he would immediately forward the comment responses directly to the BCT.

Old Paint Shop and Maintenance Area Removal Action

Mr. Jansen reported that he provided Mr. Rollyson with the project closure reports on September 20. Mr. Rollyson provided the reports to the BCT during the meeting. Certificates of disposal would be sent to the Depot, who would forward them to the BCT.

Chemical Warfare Materiel (CWM) Removal Action

Mr. Ken Shott reported that work at Site 24A had begun and that they were uncovering empty 500 kg and 250 kg bomb casings. They were also finding super tropical bleach (STB) bottles, but had not found any DANC. STB was used as a decontaminating agent. Mr. Shott indicated they were in the first 45 feet of a 100 ft trench. They planned to move the vapor containment structure due south to finish removing a casing and would then move the structure 1 or 2 more times to the west.

Mr. Shott then introduced Mr. Richard Byrd as the new Corps Site Safety Supervisor. Mr. Byrd and Mr. Jansen will continue to coordinate on soil sampling along the proposed recovery well discharge line.

Mr. Offner asked about remedial investigation samples to be collected from the excavation. Mr. Shott indicated that would be no problem and that Ms. Dorothy Richards had discussed and obtained approval from Mr. Steve Dunn.

Mr. Jansen asked if the CWM team would demobilize October 2 through October 6. Mr. Shott indicated that most of the team would demobilize, but that some UXB personnel would remain and conduct soil borings for Site 24B. Personnel from Edgewood Chemical Biological Center and U.S. Army Technical Escort Unit would also remain to provide monitoring and support during soil borings.

Mr. Shott went on to explain that an additional vapor containment structure was on its way for use on Site 24B. Multiple push soil borings would be used to better define the area of Site 24B. Once soil-boring samples identified bleach, they would stop boring.

The BCT asked where the removed casings were being stored. Mr. Shott indicated that they were sampling soil and air from inside the casing (soil from next to the sidewall). If results indicated less than 1000 ppm of diathene, the casing was bagged, wrapped and stored inside the secured, fenced area surrounding the Interim Holding Facility. The casings were not stored in the Interim Holding Facility because they were neither explosive nor CWM. The casings would be disposed of as hazardous waste at a permitted hazardous waste incinerator. They were removing all soil from within the casing. Any soil identified as hazardous waste through soil samples would be sent to a permitted hazardous waste disposal facility.

Dunn Field Remedial Investigation through Record of Decision

The BCT and project team conducted a walk-through of the Dunn Field Work Plan Addendum on September 20. The outcome of this walk-through included a resolution that CH2M Hill will provide the BCT with the following prior to mobilization at Dunn Field (by September 27, 2000).

- Sampling decision matrix,
- Updated standard operating procedures for head space sample collection; and
- Response to comments.

The final work plan will be distributed to the BCT on September 30, 2000

During the work plan walk-through, the BCT concurred on the following items:

- Well locations for validating the conceptual site model and for input in the Waterways Experiment Station (WES) model (TDEC deferred to USGS for locations);
- MW89 questions of usability – the well will be completed as a temporary 2" well and tested while mobilized; if the well produces adequate water, then it will be completed as a monitoring well. If not, it will be properly abandoned,
- MW81 – if the up gradient soil boring indicates a source material in the vadose zone, then the well will be cored and sampled following the soil sampling decision matrix; if not, then drill down the first 50 feet without coring, then begin coring and set the well, and

Work plan revisions – CH2M Hill will provide a description of elevated head space including the calculation to extrapolate soil screening level to be read with OVA FID that established trigger of 100 ppm; sampling decision matrix to define/explain 100 ppm trigger.

The BCT requested that CH2M Hill prepare and provide, directly to the BCT, technical memorandums containing litho logic/cross sections of critical area information only, no environmental data, to help with field decisions. CH2M Hill should prepare and be ready to load new data into cross sections of the following areas:

- Along the fence line, inside and outside the fence line;
- Down gradient flows parallel to the fence line; and
- Across Dunn Field (east to west, i.e. MW46 to MW54).

TDEC's comments on the work plan included information about the cross sections they wanted to see. The technical memorandum shall be prepared no later than 10 days after Category 2 soil borings are completed. The BCT will finalize monitoring well locations based on the technical memorandum information. Category 2 soil borings will give the BCT information necessary for placement of MWs 81, 83 and 84. The BCT concurred that they would review Category 2 information, then conduct a conference call to finalize placement of MWs 81, 83 and 84, to make decisions regarding source area identification and groundwater plume configuration. Mr. Offner confirmed for Mr. Morrison that all wells would be put into a database during preparation of the Dunn Field Remedial Investigation report.

The BCT requested that the Dunn Field documents not be called draft, draft final, etc., but should be numbered, for example a draft document should be Revision 0, a draft final document should be Revision 1. Slip pages should include the revision number and the date. The BCT indicated that changes from Revision 0 to Revision 1 should be in a completely new document, and not be accomplished with slip pages. CH2M Hill retracted the 1999 draft final Dunn Field Remedial Investigation report, and the document review process should start over with Revision 0.

The BCT agreed that all comprehensive CH2M Hill and Corps internal technical reviews by all necessary parties must occur before issuing Revision 0 to the BCT. The BCT's goal was to approve, or have very

Mr. Morrison suggested a sign-off page for all internal reviewers, as his experience showed it improved document quality and identified the organizations/persons involved in the internal review. Mr. Phillips agreed to discuss this with Ms. Richards.

The BCT also agreed that Revision 1 would become Revision 2 within 30 days, by issuance of any necessary slip pages, unless a BCT member invoked the dispute resolution procedures provided in the Federal Facilities Agreement (FFA).

The BCT concurred on the following document review timing (all time frames through Revision 1 were in accordance with the FFA):

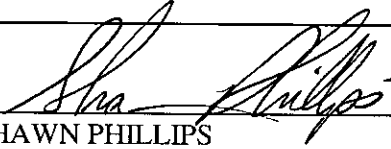
- 60 days BCT review of Revision 0
- 60 days Prepare Revision 1 (concurrent with 30 days to Prepare Response to Comments)
- 30 days BCT provide concurrence/conditional concurrence with comments to Revision 1 or invoke dispute resolution
- 15 days Prepare slip sheets if conditional concurrence with comments

If a BCT member invoked dispute resolution, then a revised document review schedule must be determined. The BCT agreed that production of the Feasibility Study would begin at the same time the BCT began reviewing Revision 0 and that the same document review process would apply to the proposed plan, as it was a primary document.


CH2M Hill was tasked to resubmit the Dunn Field document review schedule. Mr. Phillips and Mr. Ballard discussed schedules required for the BRAC Cleanup Plan, as it is being used as the Site Management Plan. Mr. Ballard indicated the schedules must be site wide and be projected out 2 years to include remedial design and remedial action. The schedules must also have actual dates to be considered the enforceable deadlines for primary documents.

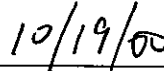
Main Installation Proposed Plan Public Comments


Mr. Phillips received comments from three citizens. Comments from another citizen were forwarded to TDEC because they pertained to a dump fire off Depot property. Mr. Phillips indicated the comments would be circulated to all project team members with notes indicated who should provide input. Since the Defense Logistics Agency must respond to the public comments, Mr. Phillips noted that project team input may be edited, but that there would be coordination with the commenter regarding any edits. Mr. Ballard noted that the final Record of Decision must include the Responsiveness Summary; so all changes to comments must be coordinated with the commenter prior to distribution of final Record of Decision. Mr. Phillips requested that the commenter be identified on all project team input.

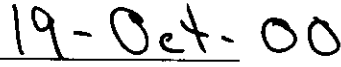

SHAWN PHILLIPS
Memphis Depot Caretaker
BRAC Environmental Coordinator


DATE


TURPIN BALLARD
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager


DATE


JAMES W. MORRISON
Tennessee Department of Environment and Conservation
Division of Superfund
BRAC Cleanup Team member


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