

# THE MEMPHIS DEPOT TENNESSEE

# ADMINISTRATIVE RECORD COVER SHEET

File: 312.700.000.a. C.H.

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FINAL

**BRAC Cleanup Team** 

**Meeting Minutes** 

October 19, 2000

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## Attendees on October 19, 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		
Brian Deeken	TDEC	
David Ladd	U S Geologic Survey	
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
Stephen Offner	CH2M Hill	(770) 604-9182
Virgil Jansen	Jacobs/Sverdrup	(314) 770-4025
Kraig Smith	Jacobs/Sverdrup	(615) 331-9232
Other Attendees		
Ben Moore	Agency for Toxic Substances and Disease Registry	
CAPT Adam Shepherd	Department of Army BRAC Office	

### **Review of Previous Meeting Minutes**

The BCT discussed and signed the September 21, 2000 meeting minutes

#### **Review of Project Status**

### Main Installation Pre-Design Field Work

Mr Morrison and Mr Offner discussed the following TDEC comments during meetings between Mr. Morrison and Mr Offner since the last BCT.

- How much volume does each diffusion sampler hold? Will there be enough volume to split samples? The diffusion samples presented hold 350 ml of water. These can easily be increased to 550 ml.
- Depending on the saturated thickness of the aquifer, TDEC may want extra diffusion samplers hung within the 5-foot section of water column for their sampling needs.
- The proposed location of the temporary well at Site SS78 would be moved to the "alley" southeast of the site. TDEC agreed to this location as being as close to down gradient as possible of the LTOA given all the cultural obstructions.
- With respect to the well locations at Sites SS42&SS43 and SS78, TDEC is very concerned with
  the placement of the wells. They must be down gradient. Mr Morrison and Mr Offner agreed that
  CSM wells must be installed first in order to confirm groundwater flow direction, then the LTOA
  temporary wells can be installed down gradient
- Provide field verification procedures to ensure that the activated carbon used with the OVA/FID is absorbing VOCs.
- On 10/18 TDEC expressed their concern that the CSM be confirmed before the LTOA temporary
  wells are installed. This is based on the data coming out of the field now, so the LTOA wells are
  down gradient

Mr. Offner addressed some of the comments during the discussion and will also address them in the work plan. To clarify the discussion about whether diffusion flow or gravity flow was down gradient, Mr. Phillips requested BCT concurrence that down gradient, for purposes of installing wells at the LTOA locations, refers to the groundwater flow direction not gravity flow. The BCT concurred.

Mr Morrison asked when TDEC would be able to split samples from Main Installation wells Mr. Offner wanted to get further along with the CSM borings to provide better information then have a conference call to discuss well locations with BCT before beginning split sampling

Mr Offner reported that after installing the first few borings he and Mr David Ladd had identified three different flow regimes on the Main Installation that should be further defined. The older CSM identified one flow regime. CH2M Hill needed to modify the CSM to show the three regimes. The BCT then discussed ways to present this information graphically and how/if the new data should be incorporated into the ROD Mr Ballard indicated the ROD could go forward as is depending on the LTOA data. Conceptually, the BCT would have enough data to say where the ROD monitoring wells should go

Mr Phillips asked when Mr. Offner could provide a work plan to include well location maps for the CSM wells. Mr Phillips voiced concern that work was occurring under a work plan that the BCT did not have in hand. Mr Offner indicated the work plan had been modified to incorporate regulator comments and that he had to make a few minor corrections. If there were no changes to the well location maps, Mr Offner anticipated the work plan would go out next week. Mr. Phillips wanted to see in the work plan the logic behind well placement, but he didn't want to delay submitting the work plan until the exact well locations were identified. Mr. Offner indicated before he mobilized for the LTOA wells, the BCT would have the Main Installation Pre-Design Field Work and Dunn Field Addendum II work plans

Mr Offner indicated he had not moved out contrary to any previous agreements. Mr Offner asked if Mr. Morrison had any further comments on well locations. After the meeting, Mr Morrison discussed some issues with Mr Phillips and Mr Ballard and provided additional comments via letter Mr. Phillips directed

Ms Richards and Mr. Offner to provide the work plans without making any changes to the well location maps Mr Ballard also wanted to see the fieldwork schedule in the work plan

### Dunn Field Groundwater Pumping System

Mr John Rollyson indicated the field team would mobilize next week and begin work October 25, 2000 Fieldwork is scheduled to be completed and the additional recovery wells online by January 10, 2001 Mr Virgil Jansen provided the BCT a schedule of fieldwork activities

For the O&M plan, Mr Rollyson indicated the Corps would extend the current contract for 2 more months to allow bringing on the four new wells and to provide CH2M Hill more time to submit the 3<sup>td</sup> year plan to the Corps Mr Ballard asked when the responsibility for developing the O&M plan would change to the company responsible for implementing the plan Mr. Rollyson indicated that would occur for the 4<sup>th</sup> year plan

## Land Use Control Assurance Plan (LUCAP)/Land Use Control Implementation Plan (LUCIP)

Mr Phillips attended a meeting earlier in the week with Defense Logistics Agency (DLA) and Department of Army funding and BRAC officials. DLA requested that Mr. Phillips draft a LUCAP for the Memphis Depot and provide it to DLA at the December In Progress Review. Mr Ballard agreed to modify the LUCAP already being drafted by Mr. Phillips Mr Ballard will provide the document to Mr Phillips by November 27, 2000.

Mr Offner asked how to talk about the LUCAP in the ROD. Mr Ballard said EPA will not signing off on the ROD until the LUCAP in place Look at the Region IV and DOD policy. The LUCAP explanation should be under the Selected Remedy section of the ROD Mr Ballard will provide a prompting comment, MR Deeken will also provide comments regarding where the LUCAP explanation should be included in the ROD.

Mr Morrison wanted to see a brief statement regarding the role and impact of the LUCAP. Mr Ballard suggested pulling information regarding the LUCAP elements from the guidance. It should not include a full-blown explanation of a LUCAP. Mr Morrison agreed

#### Old Paint Shop and Maintenance Area Removal Action

Due to Sverdrup's safety record, Mr. Rollyson presented Mr Jansen with the Tennessee Area Office's Celebrate Safety Award for the 4th quarter of FY 2000

#### Dunn Field Remedial Investigation Work Plan Addendum II Field Work

Mr. Offner indicated he would provide the final work plan to the BCT next week. Mr. Offner discussed soil boring and monitoring well data collected so far

Mr Offner reported that they had not found free phase substances in soil or groundwater. They had found high levels of dissolved PCA in soil from the borings farthest east from MW70, the monitoring well where sampling results indicated a potential dense non-aqueous phased liquid. Mr Offner continued that as they moved closer to MW70 and to MW12, concentrations of dissolved PCA in soil borings decreased. Mr Offner mentioned that groundwater sampling data from RW5, situated between MW70 and MW12, indicated increasing levels of PCA. But, that they were not seeing anything moving out in soil from the "high hit" borings. Mr Phillips indicated DLA would want to remove any source area and asked if the area appeared to be a disposal area. Mr Offner responded that, yes, there were depressions in the area Mr Offner stated that he wanted to get the dip slope of the area to see if there may be a low spot collecting

the substance He also reported that the clay layer in this area was thick, 40 feet, but that the clay thinned farther to west and that the water table also thinned to the west

Mr Offner reported that the next step in the fieldwork would be the borings along the fence line between RW5 and RW4

Mr Jansen indicated that the new recovery well, RW3, was showing only about 6-9" of water and that the pump had started cycling on and off, even though it was the new, smaller pump

#### Dunn Field Submittals for Regulatory Review Schedule

Mr. Offiner agreed to produce a hard copy of the schedule discussed by the BCT and to provide it to BCT by October 27, 2000.

Mr. Offner indicated he had worked the internal review cycle into the schedule, so that there would not be any comments/changes to Revision 0 documents from any internal review agency. The BCT then discussed the following submittal dates:

- Dunn Field RI Revision 0 February 21, 2001 (60 days for review)
- DF RI Revision 1 June 22, 2001 (30 days for concurrence/conditional concurrence with comments)
- FS Revision 0 April 27, 2001 (60 days for review)
- FS Revision 1 August 24, 2001 (30 days for concurrence/conditional concurrence with comments)
- Proposed plan Revision 0 October 8, 2001 (45 days for review)
- Proposed Plan Revision 1 December 24, 2001
- ROD Revision 0 December 14, 2001 (60 days for review)
- ROD Revision 1 March 29, 2002

Mr Morrison wanted to see this schedule bumped against the Main Installation submittal schedule before providing full concurrence. It looked good to Mr Morrison, but he did want to see the entire site submittal schedule. He voiced concern about the availability of future staff at TDEC and the Depot necessary to meet schedules for both Dunn Field and the Main Installation.

Mr Phillips then discussed the concepts he used for his internal agency remedial design schedules 6 months for relatively simple projects such as "hog and hauls" and 12 months for more complicated projects such as groundwater containment systems

Mr. Ballard and Mr Deeken voiced a concern that if reviewers identified a major problem with the Remedial Investigation report, it may not be fixed in the Feasibility Study due to tight concurrent review cycles Mr Ballard suggested that if this situation occurred, the reviewer should call Mr Offner and provide the comment verbally. Mr Ballard also suggested that the BCT and the team must discuss Feasibility Study alternatives before CH2M Hill began preparing the document.

Mr. Offner responded that he had tried to avoid tight concurrent review cycles Mr Ballard also suggested that if DLA or CH2M Hill required additional time, then DLA should invoke the 20-day extension allowed for in the FFA Mr. Ballard also reminded the team that there would also be treatability study documents, remedial designs and remedial action documents to review during some of the major document review cycles Mr. Phillips instructed Ms Richards to ensure that the document submittal schedule for RD/RA match the DSERTS schedule.

#### Restoration Advisory Board Issues

The BCT discussed the groundwater presentation slated for the January 2001 RAB meeting and determined that the data from the current sampling effort would not be available in time. The BCT agreed that CH2M Hill would provide the Dunn Field groundwater presentation, an interim report of findings, at the March 2001 RAB meeting and the Main Installation groundwater presentation at the May 2001 RAB meeting. Ms. Cooper requested that CH2M Hill and Frontline work together on the draft presentations and suggested starting the process at least 30 to 45 days before the RAB meeting.

SHAWN PHILLIPS

Memphis Depot Caretaker

**BRAC** Environmental Coordinator

**TURPIN BALLARD** 

**Environmental Protection Agency** 

Federal Facilities Branch
Remedial Project Manager

JAMES W MORRISON

Tennessee Department of Environment and Conservation

Division of Superfund

**BRAC Cleanup Team member** 

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