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THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 611

FINAL

BRAC Cleanup Team

Meeting Minutes

December 19 - 20, 2000

Attendees

BRAC Cleanup Team	Organization	Phone
John De Back (interim)	Defense Logistics Agency (DLA)/ Memphis Depot Caretaker Division (Depot)	(901) 544-0622
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		
Ted Simon	EPA	(404) 562-8642
Richard Hammond	EPA	(404) 562-8535
Brenda Gaillard	EPA	
David Ladd	U S Geologic Survey	(615) 837-4773
Denise K. Cooper	Depot	(901) 544-0610
Dorothy Richards	Corps of Engineers	(256) 895-1463
Barbara Donnell	Waterways Experiment Station (WES)	(601) 634-2730
Earl Edris	WES	(601) 634-3693
Stephen Offner	CH2M Hill	(770) 604-9182
Vijaya Mylavarapu	CH2M Hill	(350) 335-5877
Craig Sprinkle	CH2M Hill	(770) 604-9182
Bryan Burkingstock	CH2M Hill	(770) 604-9182
David Nelson	CH2M Hill	(770) 604-9182

Review of Previous Meeting Minutes

The BCT discussed and signed the October 19, 2000 meeting minutes.

Review of Project Status

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

Mr. John De Back reported that Mr. Jim Covington, Depot Redevelopment Corporation, was still working to identify the city department that could monitor compliance with deed restrictions and institutional controls Mr Turpin Ballard provided the draft LUCAP to the Memphis Depot, and Mr. De Back forwarded it to DLA and the Army for review and approval. Mr. De Back expected the Army to complete its review by mid January 2001. Mr. De Back will provide Mr. Ballard with the Army's legal department point of contact.

Mr. Jim Morrison reported that he had forwarded the draft LUCAP to TDEC's legal department and that initial comments indicated the need for more information regarding the Department of Defense/Defense Logistics Agency's financial assurances in the appropriate section. Mr. Morrison expected that TDEC would complete its review by mid January

Mr. Ballard suggested that when TDEC, the Army and DLA provide comments, then players should meet to discuss the LUCAP Mr. Ballard indicated that if the Record of Decision for the Main Installation came to EPA without the LUCAP, it would be held until the LUCAP was in place. Mr. Ballard also indicated that EPA required a LUCIP with the draft remedial design (RD) and that the Main Installation ROD must reference the fact that a LUCIP would be included with the RD.

Dunn Field Remedial Investigation Work Plan Addendum II Field Work

Mr. Steve Offner distributed initial sampling results from this field effort and the BCT discussed them The BCT also discussed the effects of the groundwater extraction system on the variation in compound levels indicated from this field effort. Mr Offner indicated that there may be some variation in plume transport when a recovery well was down or cycling that would explain the fluctuation in compound levels Mr Ballard asked Mr. Offner to investigate and keep in mind for later discussions the status of the recovery well system – was it down, had it been down for a while or just cycling?

Mr. Offner also reported that the diffusion bag samplers were installed and that he anticipates having the data available for the January 2001 meeting. Diffusion bag samples will be collected from 9 wells: MW13, MW69, MW70, MW73, MW74, MW75, MW76, MW77 and MW87. The bag samplers were hung at the bottom of each well and then within each five-foot interval of the saturated zone within the screened area of each well The bag samplers will come out on January 8, 2001

Dunn Field Risk Assessment Scope

The BCT and project team discussed the anticipated compounds of potential concern resulting from the Dunn Field Remedial Investigation (RI), the anticipated future reuse of Dunn Field, and the exposure scenarios, transport pathways and potential receptors that should be evaluated in the Dunn Field RI baseline risk assessment

Dr Vijaya Mylavarapu discussed the exposure scenarios, transport pathways and potential receptors that have already been identified and for which evaluation has already begun The team then discussed additional scenarios, pathways and receptors that should be evaluated in the upcoming draft Dunn Field RI.

Mr. Ballard suggested updating the existing risk assessment to include newer data on subsurface soil and groundwater volatiles and possible indoor and ambient air exposures to onsite and offsite receptors from volatile organic compound vapors. Dr. Ted Simon, Dr. Mylavarapu and the team discussed several transport models to evaluate this risk and the data needed to use in the models as well as existing guidance on assumptions, for example building basement depth to the depth of subsurface contamination.

Additionally, Mr. Ballard and Dr Simon recommended that potential cumulative exposures to offsite residents from offsite groundwater volatiles and dust-borne particulates be presented in the updated risk assessment Mr Ballard and Dr Simon also recommended updating the existing individual offsite/residential well risk assessment using the latest groundwater data Mr. Ballard suggested updating text in the existing risk assessment sections to clearly state/present potential offsite risks from onsite contamination.

The BCT concurred that the upcoming draft RI should include the scenarios, pathways and receptors already identified.

Mr. Morrison indicated that if there was enough data to statistically support a declaration that areas present acceptable risks to residents, then the draft RI should state this If there was not enough data, then CH2M Hill should identify the data needs necessary to statistically determine residential suitability

Web-hosted document review

Mr Ballard introduced Ms. Brenda Gaillard and Mr Richard Hammond of EPA's Environmental Knowledge Management team who provided a presentation about on-line document reviews using Adobe Acrobat 4.0 5 The project team discussed the pros and cons of the system and how the system could be applied to the Depot's project. Ms Dorothy Richards will have Huntsville's web manager contact Ms Gaillard to discuss software and hardware requirements.

Mr Ballard would like to see all submittals on electronic media. The BCT discussed different scenarios to implement an Internet-based document review system.

Dunn Field Feasibility Study Scope

The BCT and project team then discussed redevelopment plans and current land use zoning of Dunn Field for use in evaluating clean up levels and alternatives in the upcoming draft Dunn Field Feasibility Study (FS). Mr. De Back indicated that the majority of Dunn Field would be put for public sale, that the northeast corner would go to the park service, and that the 75-foot strip along Hays Road would be used by the city to widen the road Mr. De Back continued that Dunn Field was currently zoned light industrial and that the DRC's Memphis Depot Redevelopment Plan called for the zoning to remain the same. Mr. De Back said the Army intended to market Dunn Field for light industrial use

Mr. Ballard indicated that if the clean up could result in unrestricted reuse, no long term monitoring would be required. Mr. De Back indicated DLA would clean up to industrial. But, he continued, if the Army could not approve of a LUCAP for Dunn Field, then DLA might reconsider the situation. The BCT agreed that the Dunn Field FS would evaluate alternatives to clean up to industrial standards, but would also evaluate clean up to residential standards as required by EPA's FS guidance.

The BCT then discussed various clean up alternatives for soil and groundwater, as well as the documentation necessary if data indicated the use of an EPA-approved presumptive remedy. The BCT also discussed ramifications of future construction if compounds in soil were removed but the individual disposal sites were not removed

Mr. Offner discussed the soil vapor extraction pilot project currently underway. Mr. Ballard indicated that the FS must evaluate alternatives for compounds in groundwater that was on site as well as what has moved off site. Mr. Offner indicated that the recently installed monitoring wells confirmed the extent of contamination in the fluvial aquifer.

Mr. Offner also indicated more information would be forthcoming about groundwater contamination at Dunn Field after receiving and evaluating all the data from the Dunn Field RI Work Plan Addendum II fieldwork

Update of Conceptual Site Model for Dunn Field and Main Installation

Mr. Offner presented cross sections of the hydrogeology of the Main Installation and Dunn Field updated with data from the Main Installation Pre-Design fieldwork and the Dunn Field RI Work Plan Addendum II fieldwork

Initial data indicated that groundwater contamination at the southwest corner of the Main Installation was sitting on top of thick, stiff clay. At the southeast corner of the Main Installation, groundwater

contamination was also sitting on top of thick, stiff clay. However, the initial data indicated that there was no thick, stiff clay in the northwest corner of the Main Installation. LTOA wells being installed in this area will provide further data to evaluate the hydrogeology of this area.

The initial data confirmed that groundwater contamination at the southeastern fence line was flowing on site from an off site source. Mr. Ballard suggested that a surface spill had made its way into the groundwater. Mr. Morrison indicated that Mr. Offner should firmly establish in the technical memorandum for this field effort the rationale used to differentiate groundwater contamination coming on site at the southeastern fence line from groundwater contamination that may be identified by LTOA wells at the vehicle maintenance area in Parcel 4.

The BCT discussed aspects of the Main Installation ROD and RD regarding placement of sentinel and injection wells The BCT also discussed aspects of interpreting the hydrogeological data and presenting it on figures for technical memorandum

The BCT and WES discussed groundwater modeling boundaries and what the modeling would be used for - to maximize the Dunn Field pumping system, to identify any further needs to achieve the objectives of the ROD signed for the Interim Remedial Action (IRA) for Groundwater at Dunn Field objectives, and to assist with evaluation of clean up alternatives in the Dunn Field FS and placement of sentinel wells in the Main Installation RD.

O&M Plan for 3rd Year of System Operation

The BCT and project team discussed the overall objectives for the monitoring/recovery well O&M program, including data quality objectives and remedial action objectives. Mr. Ballard indicated that monitoring must also indicate if the Dunn Field groundwater extraction system was operating properly and successfully, as this was very important for the BRAC property transfer program. Mr Ballard suggested that Mr. Offner convert the IRA objectives into data quality objectives for the O&M Plan. Mr. Offner requested input from the BCT regarding the frequency of monitoring since two years of quarterly monitoring were on the record. The BCT indicated semi-annual monitoring would be sufficient

The BCT asked Ms Cooper to confirm if the City of Memphis public works department had responded to the letter requesting the elimination of some of the constituent sampling required in discharge permit.

Mr Ballard requested that the O&M Plan include reporting the total pounds of compounds removed from groundwater by the pumping system as indicated in the extraction system total effluent

Mr. Ballard indicated the following long-term monitoring objectives: down gradient monitoring to ensure the pumping system was capturing the plume, monitoring of the plume's leading edge to determine rate and extent of movement, monitoring of pumping system water levels to ensure the system maintains plume capture. Mr. Ballard added that the quality of groundwater in the source areas on Dunn Field should be re-evaluated at the 5-year review. Mr. Earl Edris indicated that the transducers for measuring water levels should go in the wells that WES used as boundary conditions in the groundwater model Mr. Ballard will have Mr. David Ladd confirm for Mr. Morrison the reaction of the Memphis Sand aquifer to pumping of the Allen Well Field

CWM Update

Mr De Back reported that the CWM project team would be on vacation until first of the year. He also reported that excavation had started on the 1946 neutralization pit and that soil sampling had indicated mustard in soil confirming that they were in the correct location. Mr. Morrison requested that Mr. Offner summarize this removal action in the Dunn Field RI to include impacts to groundwater

Dunn Field Groundwater Pumping System

According to information provided to Mr. De Back by Mr. John Rollyson, work on the original seven wells has been completed and the wells were on line, except for the new well housings with heaters. The four new wells will be completed on December 22, if the flow controls valves arrive. The final plumbing and electrical connections should be completed by December 20. The instrumentation and control subcontractor was scheduled to start work on December 18 with a scheduled completion date of December 21. The new housings with heaters were scheduled to arrive and be installed the week of December 26 The system will be tested and made operational no later than January 12, 2001

18 Jan 01

JOHN DE BACK — DATE
Memphis Depot Caretaker Division
Interim BRAC Environmental Coordinator

1/18/01

TURPIN BALLARD — DATE
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager

18-Jan-01

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

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