



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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BRAC Cleanup Team

Meeting Minutes

May 17 - 18, 2001

Attendees

BRAC Cleanup Team	Organization	Phone
John De Back	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		
Lt. Col. Daniel Welch	Defense Logistics Agency	
Mike Dobbs	Defense Distribution Center	(717) 770-6950
David Ladd	U.S. Geologic Survey	(615) 837-4773
Clyde Hunt	Corps of Engineers/Depot RPM	(901) 544-0617
Denise K. Cooper	Depot	(901) 544-0610
Dorothy Richards	Corps of Engineers	(256) 895-1463
John Rollyson	Corps of Engineers	(931) 455-6771
Peggy DuBray	Corps of Engineers	(931) 454-6630
Robert Torstrick	Corps of Engineers	(256) 895-1512
Earl Edris	Waterways Experiment Station	(601) 634-3693
Stephen Offner	CH2M Hill	(770) 604-9182 x369
Bryan Burkingstock	CH2M Hill	(770) 604-9182 x369
Virgil Jansen	Jacobs Engineering	(314) 770-4025
Kraig Smith	Jacobs Engineering	(615) 331-9232 x229
Gerry Girardeau	Innovative Waste Management	(843) 725-2014

Review of Project Status***CWM Removal Action Update***

Mr. Bob Torstrick distributed the notice of completion for the CWM investigation and removal action. Mr. Torstrick reported that UXB would prepare the close out report and distribute it for review and comment. He anticipated the draft would be distributed in about 30 days. The BCT discussed the information.

Mr. Turpin Ballard accepted the notice of completion as the Depot's notification to EPA of the removal action demobilization.

Groundwater Conceptual Site Models

Mr. Steve Offner, Mr. David Ladd and Mr. Earl Edris discussed their interpretations of potentiometric surface drawings prepared by CH2M Hill and USGS. Mr. Offner indicated all three interpretations were similar. Recent groundwater sample results indicated that the fluvial deposits at the northwest corner of the Main Installation (MI) become an area of very limited saturated thickness with clay at high elevations creating a boundary to groundwater flow on three of four sides.

Mr. Ladd commented that the potentiometric contours matched the base of fluvial deposits indicating an area of limited saturation, but that water levels in the fluvial and lower aquifers on the fourth side near MW63 were almost identical indicating a connection. Mr. Bryan Birkingstock compared this no-flow boundary area to a bowl with a chip in one side allowing water to enter. Mr. Ladd commented that potentiometric contours indicate that ground water may be entering this area of little or no saturated thickness from the northeast. Mr. Ballard commented that the high clay north of the connection was not allowing water from known contaminated areas at Dunn Field to enter the lower aquifer.

Mr. Ballard stressed that the importance of including current groundwater condition maps in the MI remedial design as well as a statement regarding the new data updating the BCT's understanding of the conditions from Remedial Investigation and Groundwater Feasibility Study. Mr. Virgil Jansen provided the most recent Operations and Maintenance (O&M) sampling results. Mr. Jansen commented that there has been no evidence of contamination transport above the maximum contaminant levels from the shallow aquifer to the intermediate aquifer, to date. Mr. Ballard indicated that the data provided the BCT the ability to optimize the monitoring system to make sure transport does not occur.

Mr. Ladd indicated areas at MW40 and MW43 west of Dunn Field exhibit similar features. The BCT also discussed volatile organic compound concentrations at MW51, upgradient of Dunn Field, that are different from the Dunn Field plume and appear to be migrating on site, co-mingling with the Dunn Field plume. Mr. Ballard responded the Depot was responsible for cleaning up contamination on its property even if contamination from another source was co-mingling. Mr. Morrison commented that Naval Support Activity Mid-South in Millington installed additional monitoring wells to define the extent of their contamination in the co-mingled area.

Mr. Offner informed the BCT that recently installed monitoring wells confirmed a substantial clay layer protecting the lower aquifer on the southern half of the MI.

The BCT discussed the conceptual site models for the MI and Dunn Field as well as potential remedial alternatives for Dunn Field groundwater, including monitored natural attenuation.

Main Installation Record of Decision (ROD) and Land Use Control Assurance Plan (LUCAP)

Mr. John De Back indicated that the Army Material Command (AMC) and the EPA continue to negotiate the LUCAP and the Land Use Control Implementation Plan (LUCIP). AMC and EPA disagree on the document to contain the LUCIP. Mr. Turpin Ballard indicated that EPA preferred the LUCIP be part of a ROD. Mr. De Back indicated the Army's preference was a Finding of Suitability to Transfer. The BCT discussed the situation and its impact on the restoration program.

Mr. De Back concluded the discussion by tasking the BCT to draft a LUCIP with as many layers of protection as possible for AMC and EPA review. The BCT agreed on the viability of land use controls as a remedial action and the importance of the LUCIP to monitor the effectiveness of controls.

Mr. Offner asked if pilot tests could proceed without the ROD in place. The BCT agreed that pilot tests could proceed.

Building 308 Cleanup and RCRA/CERCLA Integration Clause of Federal Facilities Agreement

Mr. John Rollyson reported that he provided the cost estimate and requested funds from Mr. Mike Dobbs. Upon receipt of funds, Mr. Rollyson would complete negotiations with Jacobs Engineering and provide the notification to proceed. Mr. Jansen commented that he would pull sections from the paint shop removal action work plan to facilitate BCT review.

The BCT discussed the notice of violation levied against the Depot by TDEC for not providing timely notification to renew the Part B Permit. Mr. Morrison commented that he was working with TDEC's Resource Conservation and Recovery Act (RCRA) section about the situation. Mr. Morrison suggested that TDEC's Superfund and RCRA sections should determine internally how to proceed.

Mr. Ballard distributed the RCRA/CERCLA integration clause from the Depot's Federal Facilities Agreement (FFA). Mr. Morrison suggested that TDEC and EPA also investigate CERCLA provisions for waiving permits. He reassured Mr. De Back that TDEC was willing to work with the Depot to resolve the situation, so long as the Depot fulfilled the regulation's substantive requirements.

Mr. Ballard initiated discussion of the FFA clause. Although the Depot would complete the CERCLA remedy, there were RCRA requirements to close out the site. He commented that there were two programs that converged with BCT actions fulfilling requirements of both, but the programs would split again at record of decision time. Once the Depot completed the remedy, then it must satisfy the RCRA permit closure requirements by inserting the ROD into the permit. Mr. Ballard and Mr. Morrison agreed to discuss the situation with their colleagues to see how this same situation was handled at other national priority list sites. Mr. De Back asked Mr. Clyde Hunt to continue working with TDEC to mitigate the notice of violation in the short term and to continue working toward a long-term solution.

Building 949 Remedial Action

Mr. Jansen reported that he received the statement of work from Mr. Offner. However, work cannot proceed until receipt of the signed Record of Decision. Mr. Jansen and Mr. Rollyson would continue to work funding issues to allow Mr. Jansen to begin the remedial action work plan.

Mr. De Back asked about options available to complete the remedial action as the Depot Redevelopment Corporation and the tenant wanted to complete their building construction at that area. Mr. Ballard responded that the Depot could proceed as a removal action and revise the Explanation of Significant Differences (ESD) portion of the ROD to document the reasoning. Mr. Ballard also commented that since there were no public comments expressing opposition to soil removal, the Depot has complied with the public input portion of CERCLA. Mr. Ballard continued that the Depot would prepare a replacement page for the ROD ESD portion with the rationale to move forward and submit it to TDEC and EPA with a letter requesting approval. Mr. Ballard offered to help draft the language.

Mr. Jansen requested BCT approval to collect disposal samples prior to excavation to avoid having roll off containers sitting on the site awaiting results and approval from receiving facility, which normally takes about 30 days. The BCT approved noting this process was used for the other removal actions.

Dunn Road RR Tracks

Mr. Rollyson reported that he had provided the design and funding requirement to the City of Memphis and that he continued to coordinate with the city construction people. Mr. De Back requested that Mr. Rollyson coordinate fully with the Depot Redevelopment Corporation to ensure that all work was accomplished with no impact to the business park construction project.

Long Term Operational Area wells on Main Installation

The BCT discussed their comments on the draft Data Collection Plan for the Long Term Operational Areas. Mr. Offner described the construction of the borings and monitoring wells as well as the measures planned to protect the temporary wells from the elements and from tampering. The BCT also discussed methods to protect the temporary wells from business park construction activities. A detailed construction plan will be incorporated into the plan.

Mr. Morrison and Mr. Offner also discussed well screen lengths and open intervals, sampling techniques and measuring vertical flow. Mr. Jansen asked about the existing monitoring wells in the business park construction areas and who was responsible for coordinating with the business park construction contractor about the LTOA well locations.

Mr. Offner then described each proposed LTOA monitoring well including the geological conditions he expected to encounter and the reasoning behind the proposed location. Mr. Smith commented that

MW63 was damaged by business park construction activities. The BCT discussed the importance of flexibility to locate the wells planned for the former polychlorinated phenol (PCP) wood treatment dip vat area as it is near the no-flow boundary area.

The well locations planned for this area must be optimized to provide the data necessary to define the no-flow boundary and the lower aquifer. Mr. Ballard indicated that USGS might be able to collect vertical flow measurements in the planned LTOA wells and in MWs 89 and 90. Either USGS or CH2M Hill will collect vertical flow measurements. Mr. Ballard advised Mr. Offner to coordinate the well installation schedule and measurement procedures with Mr. Ladd.

The BCT also discussed the possibility that the data may indicate the need for nested wells. Mr. Ballard indicated all completed monitoring wells not identified for long term monitoring in the remedial design would be properly abandoned and would no longer require management by the Army.

Mr. Jansen and Mr. Offner discussed various aspects of the work plan necessary to develop the cost estimate to implement the LTOA well data collection plan.

Mr. Offner recapped that there will be an internal discussion about temporary vs. completed wells; he will incorporate a well detail into the plan. The length of screen will be 20 feet or less depending on the thickness of the saturated zone. He will add the saturated thickness expected for each well into Table 3. He will add a flow map. Hill will provide field locations with map coordinates and will bring a global positioning system to pinpoint locations for Jacobs. Coordinate with USGS the possibility of them verifying vertical flow in MW89 and MW90 nested pair and if not, Hill will take the measurements.

Mr. Morrison suggested that Mr. Offner schedule the field location activities for early June and to have a flow map prepared for use to locate wells. The BCT agreed no further comments would be forthcoming on the data collection plan. Mr. Offner will finalize and distribute the collection plan.

Dunn Field RI

Mr. Offner indicated data from the past two years of O&M sampling results have been incorporated into the RI. He also commented that the recent conceptual site model fieldwork provided a much better picture of the geology and hydrogeology of the Dunn Field effort.

Mr. Offner reported that Dr. Vijaya Mylavarapu has made good progress on the risk models, especially the VOC transport to residences. The data from the CWM confirmation samples will not be included in the Rev. 0 RI. Mr. Offner also requires the CWM closure report for information about the project for use in the RI. The BCT discussed having figures and verbiage that groundwater does not contain CWM by-products, especially down gradient well MW56. Highlight the removal action and groundwater conditions.

The BCT then discussed having Rev. 0 available on Hill's web site for review and then making the CWM addendum available on the web site for review allowing sufficient time for Hill to incorporate Rev. 0 comments as well as the addendum into Rev. 1, which will be distributed on CD-ROM to the Restoration Advisory Board.

Mr. Offner confirmed that sufficient data existed to support unrestricted reuse on the eastern side of Dunn Field. Mr. Offner said he was working to begin the internal review within the next two weeks with Rev. 0 to the BCT in a month.

Restoration Advisory Board

The BCT agreed to postpone the groundwater presentation scheduled for the June RAB until the July RAB as Hill continues to process data and because Mr. Morrison and Mr. Ballard will be unable to attend the June RAB. Mr. De Back tasked Hill to prepare the groundwater flow maps for distribution prior to the July RAB meeting. Mr. Hunt to notify Frontline about this change.

Dunn Field Interim Remedial Action for Groundwater

Mr. Jansen reported that the motors on RW 3, 5 and 7 would be replaced. The pump in RW 1B failed in mid-March and would also be replaced. The manufacturer Franklin Motor would be on hand to monitor

installation, as the manufacturer believed it was an installation problem. Mr. Jansen disagreed with this as RW3 had worked properly for almost a year, was not replaced as part of Jacobs' work and yet failed at approximately the same time as the motors replaced by Jacobs. CH2M Hill's electrical engineer will also be on hand to investigate the entire electrical system. The equipment and the design are standard within the industry for this sort of project and, therefore, the pumps should not be having this problem.


The BCT discussed the ramifications on the project if the pumps failed again and options for future remedial actions. Mr. Jansen reminded the BCT that the system had functioned properly since 1998. It wasn't until the pumps were replaced and additional recovery wells connected to the electrical system that the problem with the three well pumps began. Mr. Offner indicated his electrical engineer would investigate power levels to determine if an under power problem existed.

Mr. Jansen discussed the sampling pump that became lodged in MW67 in May 2000 and activities that had occurred to date. Current situation, three weeks ago IT said they would bring out a rig to attempt to push the pump to the bottom of the well. Last week, IT sent a memo stating their plan to try pulling it out or pushing it down and, if unsuccessful, they would grind the pump up. Mr. Jansen confirmed that the pump did not contain any oil or other hazardous materials. IT has not met their proposed mobilization schedule for several reasons, and now they have postponed actions in order to locate their grinding kit. Mr. Jansen has encountered problems working with IT to resolve this situation. Mr. Jansen continued that IT's claim is that on a previous sampling effort they had difficulty getting the pump to the bottom of the well and pulling it back out, so it was a construction problem. CH2M Hill installed the original well. IT did videotape the well, and Mr. Smith identified no problem with the well.

If no action by mid-June, Jacobs intends to take on the action to obtain a driller and push the pump to the bottom. If that does not work, Jacobs intends to properly abandon the well and drill another one. Mr. De Back asked why not grind out the pump. Mr. Jansen voiced concerns about obtaining a driller capable of grinding out the pump in time for the October sampling event as well as the possibility of damaging the casing. The BCT also discussed the impact of debris left in the well damaging future sample pumps.

Adobe Acrobat 4.0.5

Ms. Richards discussed the Corps' ability to provide a software license to the client and the regulators. She will obtain 20 licensed copies and listed the agencies on the distribution list. The Corps will not provide the license to the contractors. The BCT discussed the software and the need for training.




 JOHN DE BACK
 DATE

Memphis Depot Caretaker Division
 BRAC Environmental Coordinator



 TURPIN BALLARD
 DATE

Environmental Protection Agency
 Federal Facilities Branch
 Remedial Project Manager



 JAMES W. MORRISON
 DATE

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

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