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THE MEMPHIS DEPOT
TENNESSEE

ADMINISTRATIVE RECORD
COVER SHEET

AR File Number 712

FINAL

BRAC Cleanup Team

Meeting Minutes

September 24, 2002

BRAC Cleanup Team	Organization	Phone
John De Back	Defense Logistics Agency (DLA)/Defense Distribution Center (Memphis)	(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	**Organization**	**Phone**
Clyde Hunt	Memphis Depot/USACE Memphis	(901) 544-0617
Bruce Railey	Corps of Engineers-Huntsville	(256) 895-1463
Peggy DuBray	Corps of Engineers-Mobile	(931) 454-6630
Claude Leak	Corps of Engineers-Mobile	(251) 690-2318
Stephen Offner	CH2M HILL	(770) 604-9182 x302
David Nelson	CH2M HILL	(770) 604-9182 x394
Virgil Jansen	Jacobs Engineering	(865) 220-4933
Kraig Smith	Jacobs Engineering	(931) 393-6448
David Buxbaum	US Army Environmental Center	(404) 524-5061

Master Schedule

Mr. De Back requested that no changes be made to the schedule dated 22-Aug-2002. The schedule will be periodically updated with actual dates.

LUCIP

Mr De Back reported that it has been sent out to Stan Citron for review Mr Buxbaum requested a copy for comments.

BRAC Cleanup Plan

Mr De Back has the final revision and is incorporating the final changes. Due date is October 22.

CERCLA 5 yr Review

Mr Ballard reported that Rev 0 was distributed via the Memphis Depot FTP website on Fnday, September 20, 2002 CD version of the document was made available at the meeting

Main Installation (MI) EBT Study

Mr Nelson presented diagrams and results of groundwater sampling data collected thus far during the MI EBT Treatability Study. Three sampling rounds have been conducted to date – one baseline and two performance monitoring events One other event has been completed but the data is not available at this time. The data was presented according to each study site Initial review of the results indicates that there is generally a positive response at both sites; however, the BCT agreed that this is not enough to make any conclusions yet; will wait for more samples. The BCT also discussed implications of the injection of the fluids into the aquifer, specifically contaminant transport in the aquifer via convection, geochemical reactions, preinjection carbon levels, and dissolved oxygen level variance Mr. Morrison requested more uniform scales for easier comparison and to determine significant and meaningful changes in the data

Dunn Field Recovery System (Industrial Wastewater Discharge)

Mr Smith reported that the City of Memphis has been lobbied to increase discharge limits to system There was a significant increase in carbon tetrachlonde and chloroform with the installation of four (4) new wells. Three (3) pump and motor failures occurred this summer; two (2) have been replaced. Mr. Smith expressed concern with the cost of pump assembly replacement and has suggested retrofitting the discharging piping from the pump to the wellhead with flexible hosing (steel piping is used now) Mr. De Back requested a cost analysis and data on how long the pumps will run before deciding to retrofit the system Mr. Jansen reported that the diffusion sampling bags were in place for semi-annual sampling. Mr De Back requested a separate meeting regarding some O&M issues.

Site 60 EE/CA

Mr Offner reported no major changes had occurred since submittal of the Rev 1 document in August 2002 and the preparation of the Action Memorandum. The Action Memorandum for Site 60 has been provided to DLA for review and comment, as necessary. A signature on the document by DLA will be necessary prior to submittal to the BCT Mr De Back requested that, during the removal action, every truck leaving the site be covered Mr Jansen asked the BCT if analytical testing of backfill soil was required if the soil was obtained from the site (Dunn Field) Mr. Ballard said that testing was required prior to placement of the backfill material. The testing should be at least as rigorous as if it were from an offsite source. On further consideration, Mr Ballard stated that since the soil would be from an NPL site, more rigor would be desirable. It was noted that any action required concerning the backfill material would depend on levels found during tests Mr Buxbaum suggested that the current soil standards for disposal be used Mr Jansen will discuss this with his disposal contractor

PCP Dip Vat

Mr De Back and Mr Offner discussed locations of proposed borings Mr Offner suggested placing borings around and inside the building Mr. De Back agreed to perform

soil samples for PCPs. They agreed that the PCP results from samples collected during the MI RI would be summarized in the work plan to provide rational for the proposed locations of additional borings/samples TDEC's approval of the work plan will be required prior to field activities Work may begin in January 2003

Up Gradient VOCs – Tech Memo

Mr. Offner will complete the Tech Memo based on TDEC's comments. Mr Offner will coordinate with Mr Smith to define the location of each of the three (3) new wells to be installed and assist in obtaining access for each location. Mr. De Back agreed to aid in securing access Mr Morrison reported that TDEC is installing three (3) additional wells further upgradient (east-northeast of Dunn Field) as part of a groundwater investigation at a different site.

Dunn Field FS Alternatives

Mr. Offner presented a summary of the Rev. 0 Feasibility Study to the BCT.

Regarding Section 3, he explained the alternatives are sub-categorized by medium. Mr. Ballard expressed concern about length and readability of report, detailing the "No Action" alternatives per medium. Mr De Back suggested that a single paragraph statement discussing the "No Action" alternative as being site wide, and being evaluated against detailed screening alternatives. Mr. Ballard states that he would respond to this issue in his comments on the FS

Mr. Buxbaum stated that a new TN law was enacted last summer (signed by Gov. Sunquist July 2001) which requires recordation of a "Notice of Land Use Restrictions" and may be an ARAR for Dunn Field. Although this new law was enacted as part of several amendments to the Tennessee Voluntary Cleanup/Brownfields Program it applies to any remedial action, including those conducted under CERCLA or RCRA The notice must be filed when land use restrictions are part of the remedial action Also, recordation must identify the areas of potential concern (i.e., disposal areas) with respect to surveyed, permanent benchmarks and identify type, quantity of hazardous substances known to exist at the site Mr. De Back explained the area will be handled as a total site area for deed purposes, therefore the current information on the plots is adequate. Mr. Buxbaum indicated that increased efforts may be needed if new law does apply.

Mr. Ballard questioned wording in Section 6 – vertical vs. horizontal SVE systems Mr. Ballard requested it be taken out of the FS (but kept for the conceptual design), use only SVE and cost out at higher end. Mr De Back agreed.

Mr Ballard suggested that "institutional controls" as an alternative for the disposal sites should be screened-out in the FS

Mr. Offner displayed several options for groundwater remediation. Issues involved with offsite access were also discussed.

There was a relatively long group discussion concerning groundwater remediation alternatives Mr De Back asked if just on-site treatment would apply with respect to the modeling conducted in the RI that says that VOCs would not impact the Allen Well Field. Mr. Ballard and Mr. Morrison indicated that some offsite groundwater treatment would likely be required at this time After a group discussion, groundwater alternative 4

was chosen by the BCT as being most efficient remedy for groundwater Changes to treatment-zone locations were discussed among group and are as follows (1) changes included combining PRB wall along west of Rozelle, (2) assume implementation across the MLGW powerline corridor, (3) consider the treatment area in the MLGW substation area as a contingency element, (4) the up-gradient treatment wall to be moved northeast and should be a contingency, but the costs should be kept in the FS These changes apply to many of the elements of the various groundwater alternatives.

Mr Ballard suggested the removal of MNA as an acceptable standalone remedy, since it can't pass the EPA effectiveness screening. Mr Ballard also requested removing location (onsite & offsite) for groundwater alternatives 5 & 6,since it will be decided later. The BCT concurred with combining these two alternatives and listing offsite as a contingency with separate costs.

Mr. Morrison asked about the static (or natural) groundwater flow directions without the influences of the groundwater extraction system. Mr. Offner presented baseline groundwater flow diagram from November 1998. Mr. Morrison requested that static groundwater flow conditions be considered in the groundwater alternatives.

Mr. De Back discussed choosing an alternative before seeking access agreement. Mr Ballard also requested identification of access requirements per the chosen alternative before access agreements are sought Timetable was discussed among the group and it was decided that access agreements would begin in January 2003. This activity will be added to the master schedule.

Pre-Design Investigation (Dunn Field Disposal Sites)

Mr. Offner discussed sites using Table 1-2 (as provided in the Rev. 0 FS), and that the alternatives presented in the FS consider that some remediation will be necessary at a number of the sites (assumed 75% of category A & B sites).

The BCT agreed that the CC-2 site in the Stockpile Area will be investigated to see if it poses a risk; if not, it will be moved to category C. Mr. De Back requested immediate sampling and to remove if it looks like a contamination source Mr De Back also discussed the fact that the CC-2 site did not have an IRP or DSERT number

The BCT discussed the investigation/removal of the disposal sites. There was BCT agreement on investigating the sites first, to better define the contents

Mr. Ballard suggested that since all of the disposal site alternatives require a pre-design investigation, it should conducted as soon as possible after the public comment period. This means that the development of the work plan to conduct the pre-design investigation should begin as soon as possible. It was agreed that this would be a joint effort between CH2M HILL and Jacobs Ms. DuBray and Mr Hunt will obtain headquarter understanding about the joint effort. Mr. De Back favored an early start on this. Mr Offner agreed to develop a Tech Memo concerning alternative selection; promoting an earlier start date. The BCT agreed.

Mr. Buxbaum mentioned the RCRA landfill post-closure requirements for preparing a survey plat and recording along with Deed Notice as a possible "relevant and

appropriate" requirements that would provide regulatory driver and address TDEC's concern about maintaining accessible information about the disposal areas

There was a group discussion regarding priority categories for the individual disposal sites Category A & B sites will be treated similarly and Mr. Offner will map priority category C sites

Pre-Exit Strategy for the SVE System

Mr. Offner explained the calculations and process for the soil cleanup standards presented in the FS. Mr. Ballard currently has two other reviewers (from EPA and USGS) reviewing the document and will provide comments for later discussion. Mr. Ballard added that the intermediate shutdown and elevation steps, including testing for possible rebound affects following temporary shutdown periods, need to be better presented in the FS as part of the overall SVE shutdown strategy. Mr. Offner stated that additional discussion would be provided in the Dunn Field FS concerning the elements and phases of the SVE shutdown procedures

OPS for Dunn Field

Mr. De Back requested a decision tree for OPS concerning groundwater be developed within the Remedial Design for Dunn Field. Mr. Ballard explained that Mr De Back will have to submit a document to the EPA to concur on the OPS for headquarter signature. Mr. Ballard said that he would send a copy of the EPA OPS guidance to Mr De Back.

10/31/02

JOHN DE BACK — DATE
Defense Logistics Agency/Defense Distribution Center (Memphis)
BRAC Environmental Coordinator
BRAC Cleanup Team Member

10/31/02

TURPIN BALLARD — DATE
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager
BRAC Cleanup Team Member

10 31-02

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

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE