



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 746

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File: 212.700.000(a)  
J.D. 746

**FINAL**

**BRAC Cleanup Team**

**Meeting Minutes**

**March 25 - 26, 2003**

<b>BRAC Cleanup Team</b>	<b>Organization</b>	<b>Phone</b>
John De Back	Defense Logistics Agency (DLA)/DDSP-D (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
<b>Project Team</b>	<b>Organization</b>	<b>Phone</b>
Karl Blankinship	U.S. Army Corps of Engineers - Mobile	(251) 682-7546
Chris King	U.S. Army Corps of Engineers – Huntsville	(256) 895-1843
David Buxbaum	U S. Army Southern Region Environmental Office	(404) 524-5061 x287
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

#### ***Land Use Control Implementation Plan (LUCIP)***

Mr. David Buxbaum reported that he and EPA plan to forward the Rev. 0 (version 4) LUCIP up the chain so that it can begin DOD's 72-hour review by next month. Mr. Buxbaum indicated that he was working closely with EPA and TDEC to produce a document acceptable to all parties.

The BCT agreed to include the final LUCIP in the 60% Main Installation Remedial Design, but that the LUCIP would not be open for further agency comment.

#### ***Main Installation (MI) Enhanced Bioremediation Treatability (EBT) Study, Groundwater Remedial Design (RD)***

Mr. Nelson reported that work began February 24 to reinject sodium lactate. All indicators are present for the vegetable oil to work, but it has taken time for the oil to breakdown and for the bacteria to respond to the food source. Mr. Nelson reported that samples collected from the wells associated with sodium lactate injection are showing excellent reactions. On March 24, CH2M Hill began collecting the first set of groundwater samples since the reinjection.

The BCT agreed that if sampling results indicate enough progress within the next few months, then the team should begin the remedial design process before completing all of the pre-design field work.

Mr. Morrison provided insight on the positive results of the lactate injection pilot study for similar groundwater constituents being conducted at the Tennessee Air National Guard base at the Memphis International Airport. Mr. Edwards reported that evidence from several Air Force lactate injection projects indicated multiple lactate injections provided greater response.

Mr. Edwards suggested, and the BCT agreed, that CH2M Hill conduct two more sodium lactate injections and that the next injection should occur within the next two weeks. CH2M Hill's contract must be modified and funded in order to accomplish the task. Mr. Blankinship will forward a funds request to Mr. Bruce Railey, Huntsville Corps, in order to facilitate contract modification for two more sodium lactate injections. CH2M Hill will forward a request for modification to the Corps contracting officer.

Mr. Nelson indicated he was awaiting results of the EBT study and the final LUCIP in order to produce the Rev. 0 MI Groundwater RD. Mr. Nelson indicated he would begin developing the document prior to completion of the EBT study and insert the appropriate compound – vegetable oil or sodium lactate.

***Main Installation (MI) Transferable Parcels and Environmental Condition of Property (ECP) Category Codes***

The BCT agreed to the MI ECP category and parcel boundary changes proposed by Mr. DeBack at the January meeting (See attached map). The changes will be incorporated into the next revision of the BRAC Cleanup Plan.

With completion of the pistol range removal action, Mr. DeBack will prepare and distribute to the BCT a proposal to change the recreation area and eastern portion of Dunn Field to ECP Category 4 and to include the meets and bounds of the area. The BCT agreed to review and provide feedback on Mr. DeBack's proposal.

***Dunn Field Off-Site Upgradient Monitoring Wells***

The BCT reported on their site visit to the three monitoring well locations and agreed on the locations (intersection of Hayes and Person Roads and convert PZ02 to a monitoring well). Mr. Ballard reported that the owner of the Jeffries property provided verbal consent to access the property. Mr. Morrison has drafted an access agreement for signature and volunteered to introduce Mr. Smith to Mr. Jeffries.

Mr. Blankinship will work with Ms. DuBray to expedite the funding request and preparation of the request for proposal, and Jacobs Engineering will expedite the bid proposal. Mr. DeBack will request that DDC expedite the funds request. Mr. Offner will forward the scope of work to Mr. Blankinship and Ms. Peggy DuBray on March 25. Mr. DeBack indicated that the site-clearing portion of the scope should include scrap material removal, upgrading the roadway with gravel, and limb removal, as appropriate. The scope should also include screening depth and length for use of diffusion bag samplers, initial sampling parameters as well as the wells to be sampled (head only in MW28).

The team confirmed that the objective of the off-site wells was to better identify/confirm an upgradient source of the contaminant plume at the north end of Dunn Field and to refine the plume geometry.

### ***Hayes Road Easement***

Mr. DeBack reported that the Hayes Road easement would include a 30-foot wide strip of Dunn Field along Person Road as well as along Hayes Road. Mr. Offner provided the city information regarding monitoring well and discharge system equipment along the proposed easement area. Mr. DeBack reported that the city would include raising the wells to match the new road grade in their proposal. Mr. DeBack requested that Jacobs Engineering work with the city on plans for raising the monitoring wells.

### ***Dunn Field Disposal Pits***

Mr. Nelson distributed the Rev. 0 Dunn Field Disposal Pits Pre-Design Investigation Work Plan to the BCT and discussed several elements. Mr. Blankinship will issue a request for proposal to Jacobs Engineering, who will use the Rev. 0 work plan to prepare the proposal. Mr. Blankinship will work with Mr. Jansen to begin the field work contracting process during the Rev. 0 work plan review. Jacobs Engineering anticipates beginning field work by mid-June.

### ***Dunn Field: Rev. 1 Feasibility Study (FS), Rev. 1 Proposed Plan (PP) and Rev. 0 Record of Decision (ROD)***

Mr. Ballard reported he had discussed with Dr. Ted Simon that Dunn Field FS base cleanup levels on residual risk as opposed to ARAR contaminant levels because of multiple contaminants in each well, cumulative effect on human health, and contaminants that do not have ARAR-driven cleanup levels so cleanup levels are based on risk. Mr. Ballard suggested to the BCT, and has also voiced the suggestion to EPA, that the Dunn Field Proposed Plan include an explanation of both the traditional ARAR/contaminant level approach and the residual risk approach.

Mr. Ballard also indicated he has is looking into a waiver for the 1,1-DCE maximum contaminant level (MCL) as it is in transition with the Office of Water, EPA Headquarters. Mr. Buxbaum will work with EPA legal regarding 1,1-DCE MCL waiver.

Mr. Ballard provided several comments on the Rev. 1 PP. Mr. Offner will add residual risk justification per EPA comment and can post it on the website March 26. He will also attach a placeholder for a figure, to be created and inserted into the Rev. 2 PP, showing the location of the "C" locations. The BCT will review the Rev. 1 PP again with the residual risk justification before distributing it to RAB. Mr. DeBack scheduled the Dunn Field Proposed Plan public meeting on May 15.

Mr. Buxbaum indicated that some document, preferably the ROD, must identify each SWMU/AOC identified in the Depot's previous RCRA permit and the final accounting or disposition of it for both Dunn Field and the Main Installation. The Dunn Field ROD must also include the location (X&Y coordinates) of all "C" sites, as that information must be provided to future landowners. He also requested that the "Responsible Agency" portion of the ROD provide readily visible identification of the agency responsible for land use controls (LUCs) for the out years. He indicated that LUC responsibility changed from the Defense Logistics Agency to the Army once the remedy was in place.

### ***Zero Valent Iron (ZVI) Pilot Study***

Mr. Offner proposed conducting a ZVI bench test somewhat concurrently with the batch reactor test in order to better design the remedy and potentially reduce remedial action costs. The BCT concurred to run the ZVI bench test and reactor batch test simultaneously.

***Dunn Field Recovery System (Industrial Wastewater Discharge)***

Mr. DeBack requested that Jacobs Engineering assist him to update the Industrial Wastewater Discharge Agreement. Mr. Buxbaum and Mr. DeBack will continue to discuss the need for a permit as the water originates from a CERCLA site. Mr. Smith indicated the system was operating normally with 10 of 11 wells running. One motor was burned out, but it will be repaired during the flexible pipe retrofit project tentatively scheduled to begin March 31.

***Dunn Field Pistol Range Removal Action***

Mr. Smith reported that removal action field work was completed on March 10. Jacobs Engineering is currently drafting the project completion report and awaiting the certificates of disposal.

***Master Schedule***

Mr. Offner presented changes to the master schedule and introduced a separate document submittal schedule. The BCT discussed timing of several aspects of the project such as LUCIP review, MI EBT study, ZVI pilot study and the Dunn Field ROD.



JOHN DEBACK

5/14/03

DATE

Defense Logistics Agency/Defense Distribution Center (Memphis)  
BRAC Environmental Coordinator  
BRAC Cleanup Team Member

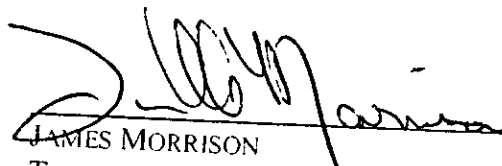


TURPIN BALLARD

5/14/03

DATE

Environmental Protection Agency  
Federal Facilities Branch  
Remedial Project Manager  
BRAC Cleanup Team Member



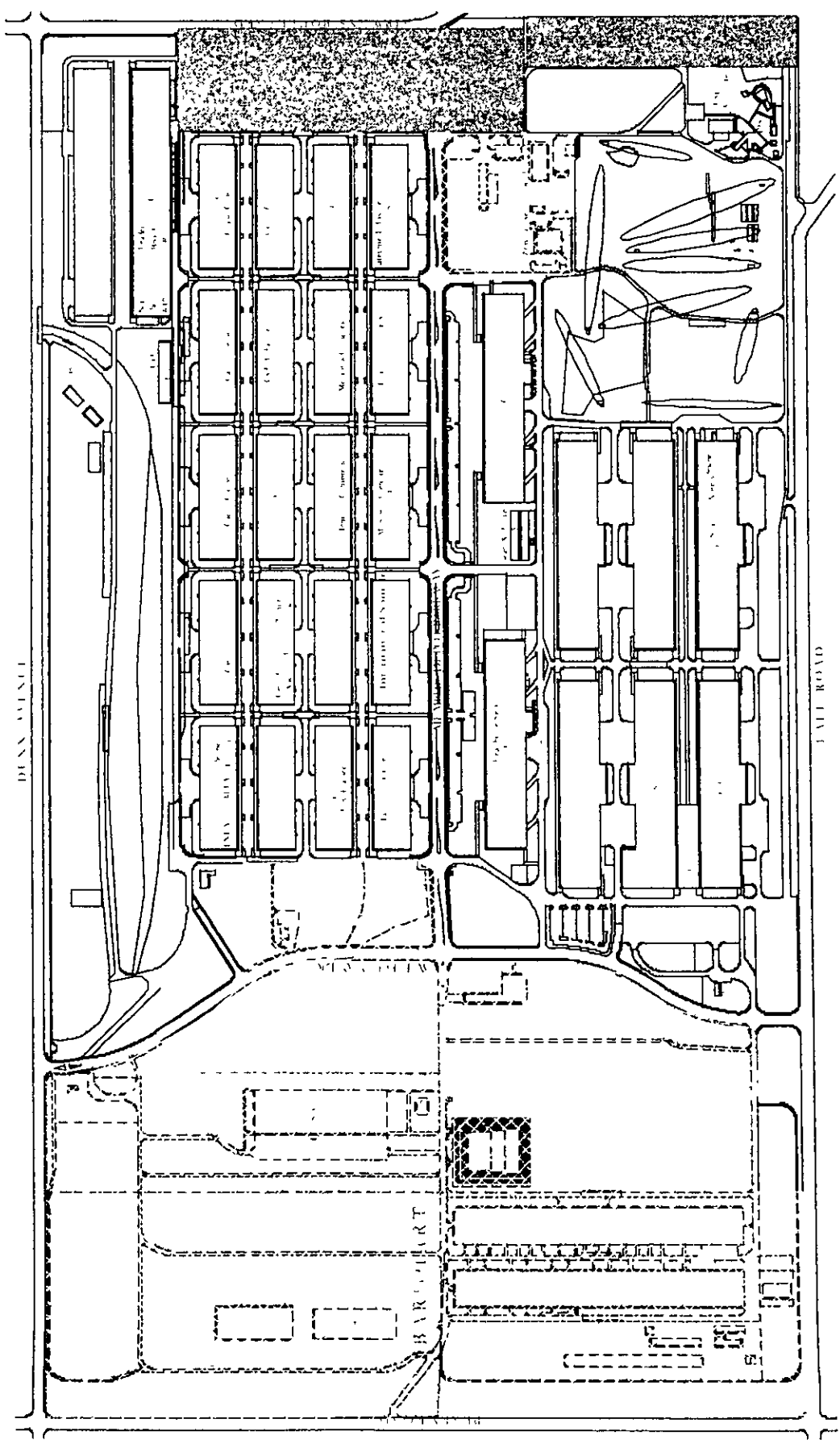
JAMES MORRISON

5-14-03

DATE

Tennessee Department of Environment and Conservation  
Memphis Field Office  
Division of Superfund  
BRAC Cleanup Team Member

# Memphis Depot Main Installation Disposal Plan



Legend:

- FOST #3 Properties
- Remediation Area (FOST 4)
- Transferred Properties (Decd Issued)
- Transfer Names
- Storage Areas

DDSP - Memphis Revised / Jan 28, 2003

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