



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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Final

Memphis Depot
BRAC Cleanup Team
Meeting Minutes

May 20, 2004

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Project Team	Organization	Phone
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Kinzie Gordon	Mitretek Systems	303.779.2664
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Field Activities

Mr. Quinn provided information on installation of the LTOA monitoring wells and said that 12 wells had been installed as of May 20.

- MW143: Non-detect for VOCs, except a 2.5J ppb level of MTBE. Saturated thickness of about 2 feet. Good water production, with gravelly clay. Water level elevation of 205 msl, based on estimated ground surface.

- MW140: Encountered clay at 115 bgs before encountering water at 135 bgs. Set well at 246 bgs with screen from 226 bgs to 246 bgs. Mr. Quinn anticipated hitting clay at 180 bgs, but never encountered it. Mr. Holmes reiterated that the goal for this well was to be a down gradient well for the intermediate aquifer, since the drillers hit dry clay the area of upper portion of the "horseshoe" will expand. He said that the goal was to screen the well in the intermediate aquifer, not to find the Memphis Sand aquifer. Mr. Quinn said that the water level at 135 bgs corresponds with the 2003 potentiometric surface map. Mr. Morrison asked if it was a good monitoring point for LTM. Mr. Quinn indicated that the well fit with the current interpretation, so yes, it was a good monitoring point. Mr. Ballard said that there might be value to install a transducer to see if pumping at the Allen Well Field influences that location to see if water is moving toward the window, indicating possible contaminate vertical flow. The project team discussed hydraulic conditions in adjacent monitoring wells, issues related to collecting vertical flow data from a 20-ft screen interval, and the necessity of collecting low flow samples vs. bags in order to obtain MNA parameters.

AI: Mr. Quinn and Mr. DeLano to look into vertical flow meter, transducer and water level data logger and report back to Mr. Holmes, who will then coordinate with the BCT.

- MW39A: Encountered clay at 169 bgs, about 17 feet lower than anticipated. Clay level makes the clay trough contours steeper at this location. Saturated thickness of 66 ft.
- MW94A: Encountered clay at 117 bgs. Clay level makes the clay trough steeper, so contours will become tighter at this location. Saturated thickness of 9 ft.

Mr. Holmes initiated the discussion of where to locate MW142, which was to help identify potential source of VOCs in MW62 from the former drum storage area. The team discussed interpretations of the top of clay and water levels in the area. Mr. Quinn indicated that clay levels for MW143 corresponded with previous interpretations and that groundwater flow directions did not change significantly, based on estimated elevation of water levels in MW143. The BCT agreed to install MW142 southwest of MW62, off of Barnhart property.

Mr. Quinn moved on to the monitoring wells installed in Target Treatment Area 1.

- DR 1-1: Encountered clay at 136 bgs, which corresponds with the projected clay location. Saturated thickness of 41 ft. Installed screen from 136 bgs to 116 bgs. Mr. Quinn indicated a cluster well would be installed next to it with a screen from top of water down 20 ft.
- DR 1-2: Encountered clay about 20 feet deeper than anticipated, which makes the slope of the clay trough steeper. Saturated thickness of 23 ft, so no cluster well at this location.
- DR 1-3: Saturated thickness of 35 ft. Clay 13.5 feet deeper than anticipated, which makes slope of clay trough narrower and steeper.
- DR 1-4: Saturated thickness of 31 ft. Clay approximately 7 feet deeper than anticipated. Mr. Morrison asked if there were any minor clay lenses. Mr. Quinn responded, not really.
- DR 1-5: Saturated thickness of 50 feet, a cluster well would be installed next to it. DR 1-5 was screened at the top of clay up 20 feet. Clay 12 feet shallower than anticipated.

AI: Upon receipt from the lab, Mr. Holmes will distribute the analytical results from these 5 wells to the BCT.

Mr. Quinn reported that Target Treatment Area wells DR 2-5, 2-3 and 2-2 were installed and that the drillers were in the process of installing DR 2-4, which had shifted 30 feet east due to utilities. He said that DR 2-2 shifted 20 feet east due to above and underground utilities.

- DR 2-5: Saturated thickness of 3.5 feet. Encountered the top of clay at 99 feet bgs, 5 feet deeper than anticipated.
- DR 2-3: Installed early in the week, so no data yet.

Mr. Quinn indicated that the drillers were having problems finding the appropriate location for DR 2-1 that was to be located at a potential source area, a sump, due to utilities and proximity of buildings. He said they wanted to keep it down gradient, but in the potential source area.

Offsite Access

Mr. Holmes reported that access has been obtained from Shelby County for the location on Rozelle for the monitoring well. He said that Mr. Ed Blocher had met with Ms. Monica Darby of MLGW and cleared the monitoring well locations for their property. However, the MLGW attorney wanted to change COE's right of entry statement regarding liability not exceeding the Government's appropriations. Apparently, COE cannot make that change, so he is at a stopping point. Mr. Buxbaum discussed the liability language and agreed to speak with the Corps of Engineers attorney about deleting the liability language.

AI: Mr. Buxbaum will speak with Mr. Blocher, preferably in conference call with Mr. Holmes, and then take necessary steps to move forward with the MLGW access agreement.

Mr. Holmes said that the team was not pursuing the PRB locations yet because they want to obtain access for the monitoring wells first. Mr. Morrison would like to be involved with next MLGW meeting to ensure the project is being effectively communicated. Mr. Buxbaum emphasized that MLGW needs to understand that the liability statement is a Federal statute. If MLGW will not sign the right of entry, then they need to know that the team will start the CERCLA 104(e) process to gain access. Mr. Ballard suggested starting the process now and reminded the team that the FFA provides that DLA must notify the regulatory agencies that access issues have effectively stopped implementation of the remedy. Mr. Buxbaum said that the process could not really start until all steps necessary to obtain access have been taken and documented. He also felt confident that he could work it out with MLGW's attorney.

AI: Mr. Buxbaum to speak with Mr. Morrison Monday about his conversation with MLGW lawyer.

Mr. Holmes reported that Mr. Blocher obtained access to the two residential lots for ZVI injection wells on Menager and Rozelle. Mr. Buxbaum said that he met informally with the Belz Corporation attorney about obtaining access. Mr. Offner will prepare for Belz Corporation a description of the project and anticipated providing it to Belz in the next few days. Mr. Holmes said Mr. Blocher had requested that the team consider the need for access to railroad property because of their required paperwork. The team will focus on obtaining access to MLGW and Belz property, and will then work to obtain railroad access.

AI: Mr. Offner to prepare one-page descriptions of the ZVI project for MLGW and of the PRB project for Belz Corporation.

Land use restrictions

Mr. Buxbaum said that Mr. Buddy Waggoner needed a map showing where the LUCs will apply. Mr. Buxbaum indicated that he thought Mr. Offner said that CH2M Hill had a site map that with surveyed benchmarks showing areas of residual contamination, and he believes that is what Mr. Waggoner really needs. Mr. Buxbaum said to ask Mr. Waggoner if he needs a site map with the surveyed benchmarks. Mr. Sprinkle said that if CH2M Hill did not have one, then they could make one. If Mr. Waggoner needed property boundaries, then CH2M Hill did not have a map with surveyed property boundaries.

AI: Mr. Holmes will send Mr. Waggoner the LUCIP with a PDF of the map.

Internal Review Process

Mr. Holmes said the goal is to complete the internal review process before submitting Rev. 0 to the regulatory agencies. Any comments received by the team after that time would be in response to changes/comments from the regulatory agencies. Mr. Ballard said he has asked that FFA reviews be the review without any tweaking from internal reviewers, and he asked if the schedule submitted for approval provided enough time for internal review prior to distribution of Rev. 0. Mr. Holmes indicated that the internal reviewers saw the schedule before it was submitted and didn't have any comment, but he was unsure if they looked at it with internal review in mind. Mr. Ballard suggested that if CH2M Hill provided the usual time needed to produce Rev. 0 RDs that, based on previous experience, it probably did not provide sufficient time for internal review. He suggested adding at least 45 days for internal review.

Mr. Holmes indicated that he would update the schedule to include at least 45 days for internal review when he responded to EPA comments regarding the LUCIP and letters, etc. Mr. Ballard requested 60 days for review and approval of the final MI RD. He said he needed more time as the final MI RD changed significantly since the 90% MI RD, due to comments he did not make. He said to treat it like a draft primary document, so 60 days for the final MI RD. He continued that for the Dunn Field RDs, the team should flesh out issues at the intermediate document stage instead of continually fleshing out the issues and increasing the size of document.

Mr. Holmes said that the team would address key issues as they move from intermediate to the pre-final. Mr. Ballard said that issues should be identified during the intermediate phase. He continued that the MI RD comments were good, but that he needed to see them before he started his review.

Mr. Dobbs said that the next meeting would consist of a two day meeting with the first day as a team-building opportunity and the next day as a BCT meeting.

Report Transmittals

Mr. Holmes was under the impression that Rev. 0 documents were distributed either on an FTP page or as electronic submittals. He asked if the regulatory agencies needed CDs. Mr. Ballard and Mr. Morrison replied they needed three (3) CDs each.

BCT meeting minutes

Mr. Holmes reported that there was a lot of discussion about last month's minutes. From the various discussions, he understood that the minutes should accurately reflect what was said. If a major issue arises, then a note of clarification will be appropriate. Mr. Ballard suggested that at the partnering meeting the team should develop some ad hoc rules about sidebar conversations, etc.

Transfer of Environmental Data

Mr. Holmes said that CH2M Hill was compiling an index of all their submittals to make the team aware of what documents should be out there. Mr. Railey said they were putting together a database in order to transfer all the data to be consistent with future needs. Mr. Holmes said the data to be transferred was not just laboratory data, that it included boring logs, water levels, etc. He said MACTEC and CH2M Hill were trying to expedite the transfer of old data and were continuing to work newer data issues.

Mr. Dobbs said that because there were security issues about the FTP site, DDC was working with MACTEC to establish a website that provided secure data.

Archive Files

Mr. Holmes indicated that Mr. John DeBack thought that everything relating to environmental conditions was no longer stored in the old office area. DDC and MACTEC want to make sure the proper disposition of the remaining files, so MACTEC will implement a project to review and catalog what is there. Mr. Holmes anticipated accomplishing the task by the next BCT.

Master Schedule

Mr. Holmes said that according to the schedule, MACTEC was to have the post-ROD schedule with EPA comments incorporated back to the regulatory agencies on June 7. Mr. Ballard said he needed it before June 1, as he must update the dates in his system. He said that if the only change was the final MI RD review, then he could add 45 days to the existing date.

AI: Mr. Holmes will work with Mr. Offner to provide updated dates to EPA by May 28.

Dunn Field

Disposal Sites

Mr. Holmes reported that the BCT has approved the DF Disposal Site RD and that they have received Rev. 0 Disposal Sites Remedial Action Work Plan. Mr. Holmes asked if EPA needed the document on CD. Mr. Ballard did not require a CD and indicated he would provide comments by June 18, as he would be on vacation after that. Mr. Morrison said that TDEC has given its proxy to EPA and will not provide comments.

Mr. DeLano said that the excavation activities outlined in the work plan included five disposal sites with principal threat wastes. Excavation activities will follow the usual process: excavate, confirmatory sample, etc. Mr. Ballard indicated that the DF ROD reads that if the results of disposal sites pre-design investigation would dictate which sites, if any, would require remediation. He suggested that the team confirm if an Explanation of Significant Differences was necessary to document that only these five sites would be removed. Mr. Ballard also suggested that Mr. DeLano review the Transportation and Disposal plan to ensure that the transporters and waste disposal site can actually transport and accept CERCLA waste to avoid issues that arose during the CWM removal action.

Mr. DeLano confirmed that the T&D plan, as well as MACTEC's contracting process, ensured that transporters and disposal sites could accept the waste. He said that at this point MACTEC has not selected a facility or a transportation route, but that the plan provides the process for how to select them. Part of a pre-construction submittal will provide facility info, permits, etc. Mr.

DeLano said that the process in the work plan includes meetings with facilities and an opportunity for regulator input on selected facilities and to facilitate discussions.

Source Area Remedial Design

Mr. Sprinkle distributed recent data from the ZVI test and reported that the wells within the influence zone, MWs 132 and 133, indicate significant degradation of 1,1,2,2-PCA, about 90% reduction. He continued that ZVI appeared to be doing a good job within the treatment zone. MW131 was supposed to be upgradient of the treatment area, but it received a little bit of the ZVI showing that the zone of influence was larger than expected.

Mr. Sprinkle said that the data indicated better than a 90% reduction overall, which was good for this technology. The results don't provide how long the ZVI will last, but the ZVI company data indicates it will last 2 to 3 years. The data indicated some fluctuations in TCE at MW73. Mr. Sprinkle reported that no more sampling was scheduled.

Mr. Ballard asked about the elevated dissolved oxygen (DO) readings. Mr. Sprinkle said that water flowing into the area and mixing with water affected by the ZVI was causing DO fluctuations. Mr. Morrison suggested collecting DO readings from various depths to document variations vertically. Mr. Sprinkle will ask at what depths the readings were collected. Mr. Ballard asked if the older wells were part of the LTM sampling, and Mr. DeLano will check. Mr. Sprinkle said that the pilot test completion report will become an appendix to the Source Area RD. Mr. Ballard suggested putting it in the 60% design, so it can be reviewed at the same time.

Mr. Ballard asked if the data should indicate an increase in daughter products. Mr. Sprinkle said that the data would not necessarily indicate daughter products because the treatment was not causing a reductive process. It was stripping off chlorines causing an immediate change.

In response to a question regarding further ZVI injections during the RA, MR. Sprinkle said that experience with this particular technology indicated that achieving 90% reduction was good in a source area. He continued that the technology did not lend itself to be removed and replaced, so he was not sure if the team wanted to look at additional injections in this area. The ZVI will last for several years, so there should be good treatment without re-injection. Mr. Ballard said that at the last meeting there was a question that since the ZVI material was so fine that it may degrade quickly, and he was thinking that one could inject ZVI using the SVE borings. Mr. Sprinkle said that in two years there would be a build up of iron oxide near the injection site that would prohibit injecting more in the same area.

Remedial Action (RA) Enhancements

Mr. Sprinkle said that CH2M Hill was looking at additional source treatment design, based on EPA's question regarding enhancing the treatment. He said that CH2M Hill had given COE a proposal to run a 'frac' test to include 'frac'ing the geologic formation, and then running the ZVI test again. Mr. Ballard said that the DF ROD did not specifically mention fracing but it did mention enhancements and that it might be an option for the higher concentration areas. The team also discussed resistive heating as a possible enhancement, but determined that it was not cost effective for the geology of the area.

Mr. Holmes said that Mr. Ballard had asked about other enhancements and if the RD included contingencies for enhancements. Mr. Ballard said the RD included a flow diagram for the "when to stop" process, but perhaps it should have plans for enhancing. Mr. Sprinkle said the plan was

to see how the natural formation responded to the SVE and go from there. He suggested including a flow chart in the RD that allowed for evaluation of enhancements.

The BCT agreed not to conduct a 'frac'ing study at this time. The BCT agreed to see how well SVE worked and that if areas were area identified that needed enhancing, then consider it in those areas.

PRB Design

Mr. Holmes indicated that after looking at experience and constraints at the site, that MACTEC agreed with CH2M Hill's approach to use GeoSierra as the subcontractor for the PRB remedial action. He said that MACTEC would start working with AFCEE on using GeoSierra in a sole source contract. CH2M Hill has talked with them about design consultation. Mr. Ballard said the schedule should include the time needed to bring them on for the design.

Well installation near MW54

Mr. Holmes said that there were access issues to overcome in order to the install the wells. He discussed the goals for the wells with Hill since three wells were for the PRB design and to get contaminant information, he wanted to make sure there were no special needs for those wells. There were not any special needs, so MACTEC will log them the same as the other wells. Mr. Bryan Burkingstock from CH2M Hill will be on site with the MACTEC crew during well installation. Mr. Holmes said that MACTEC moved some monitoring well locations due to overhead power lines, but he did not see any issues with the PRB injection well locations. Mr. Offner will provide MLGW with a brief description regarding the PRB project to begin the access discussion.

Ms. Gordon asked if there was any recent data from the bench test. Mr. Sprinkle was unsure about recent data, but would ask Mr. David Nelson. Mr. Ballard said the update from the April conference call indicated, but the data was still being evaluated. Mr. Sprinkle said that one of the issues was that the CH2M Hill wanted to look at the data and had a problem with how ETI had interpreted their bench test data.

Mr. DeLano reported that the crew had installed diffusion bags in the wells and pulled them on April 29. He distributed the MW54 preliminary data. He reported that levels were a little higher than CH2M Hill's sampling and that they were seeing some stratification of TCE and PCE within the well. He said the semi-annual report should be distributed around July 1.

Mr. Ballard asked if there was a separate schedule for IRA deliverables.

AI: Mr. Holmes will check for a separate IRA deliverables schedule.

Shutdown for GW level

Mr. DeLano initiated the discussion about shutting down the recovery system to determine rebound. He wanted to coordinate the shutdown with City's shutdown during the Hays Road project. He asked the if the BCT wanted to look at two shutdowns or stay on track and wait for the City project and do it all at once. Mr. Ballard said that since the shutdown was to gain info on possible groundwater flow direction change under natural flow affecting the PRB location and was to be used for the PRB design, that the timing should be driven by the 60% RD.

Mr. Holmes suggested, and the BCT agreed that if the City's project shutdown does not occur by a certain time, then MACTEC will shutdown the system. He said that MACTEC would manually

check water levels in certain wells. Mr. DeLano said there were 6 to 7 wells that already have transducers, so they would look at those. Mr. Sprinkle confirmed that no samples would be collected, just water levels.

AI: Mr. DeLano will draw up procedures for obtaining water levels and distribute internally then to BCT - next week.

AI: Mr. DeLano to provide TM on first semi-annual sampling round for DF IRA.

Mothballing the IRA

Mr. Holmes said the plan was to shut down the recovery system once the ZVI was in place. Mr. Ballard asked if the timing for shutting down the recovery system was in the RD. Mr. Sprinkle said there was a general statement that upon completion of ZVI, then the recovery system would be shut down. Mr. Sprinkle will ensure that the general statement in the RD mirrors the DF ROD language.

Finding of Suitability to Transfer (FOST) 4

Mr. Holmes said that Ms. Cooper was working FOST 4. The BCT agreed that the boundaries of Subparcels 36.31 and 36.27 would change so as not to include the area over the groundwater plume. The area over groundwater contamination would be incorporated into the ECP Category 6 area and would not be available for transfer until the OPS determination.

Mr. Buxbaum indicated the government had probably already provided an easement for the roadway area that could continue for that small area in lieu of transfer. FOST 4 will not include areas over groundwater contamination.

AI: Mr. Holmes will look into installing a monitoring well to delineate area of groundwater contamination along northern fence line.

Mr. Dobbs said that upon completion of this transfer, the team should abandon monitoring wells on the property that are no longer needed.

Main Installation (MI)

Remedial Design (RD)/Long Term Monitoring (LTM) Wells

Mr. Sprinkle said CH2M Hill was on track to distribute the final MI RD on May 24. He said that the final was not significantly different from the previous revision, even with all the Mitretek comments. Basically, the areas that needed to be cleared or tightened up, were. He said that CH2M Hill has modeling to show that the remedy will work and that the residual contamination outside the treatment area should naturally attenuate. He removed the biochlor model information altogether based on the comments.

Mr. Sprinkle indicated that Table 3-2, Indicators for Anaerobic Aquifer Conditions, would be modified to include to essential indicators only. Mr. Ballard suggested having a table of field parameters to say "inject" or "don't inject." Mr. Sprinkle's approach was to prove to the agency that the system was performing as designed and for that the agency would want to see not only the field conditions, but also the contaminant reduction. Mr. Ballard's goal will be to make sure that the system creates treatment conditions and retains the treatment conditions. He said there could be reducing conditions, but the system also needed electron donors. Mr. Sprinkle will change it to two tables: one for the essential conditions and one for the other indicators.

Mr. Sprinkle said there was language in the optimization section regarding production of methane that Mr. DeLano will take farther in the RA WP. Mr. Ballard suggested that he take VOCs off Table 3-2 because they were performance monitoring levels, not indicators of reductive dechlorination.

Mr. DeLano said he would put this into the RA WP in the form of flow charts. The bi-weekly sampling parameters allow the team to ensure the correct performance of the system. He continued that as the team moves forward, they will look at the varying levels of sampling and all the "pieces of the puzzle" to optimize the system to obtain the best performance.

Remedial Action (RA) Work Plan

Mr. DeLano said the internal review copy was on schedule for distribution on May 24 and to the BCT on June 18. The design related investigation results would not be included. If MACTEC foresees an area in the work plan that may change based on design related info, they will flag it so the regulatory agencies can see that there may be significant changes based on their interpretation of the plumes. Mr. Ballard said that with the caveat Mr. DeLano provided, he did not think it was important to change all the figures based on a summary of the design information. He suggested that Mr. DeLano keep the flags throughout the work plans and identify the actual locations in the construction completion report. Mr. Ballard suggested that Mr. DeLano present the alterations based on the design information to provide the BCT with an idea of the changes, but he did not see the need to revise the work plans just to change well locations or the number of wells.

Mr. DeLano distributed the overall schedule for implementation and the remedial action construction flow charts. Mr. Ballard did not think the system had to meet MCLs to show operating successfully because most of the sentry wells currently did not have contamination above MCLs. Mr. DeLano said the intention of sentry wells, as described in the RD, was that if the system was not meeting MCLs in sentry wells then the team needed to look at the system. Mr. Ballard said that if you wanted to show the system was operating successfully then the wells within or closely bounding the treatment area should indicate reduction. He continued that there were sentry wells outside the plume, intermediate wells in the plume and wells within the treatment area of influence, and that you should see reduction in the intermediate wells. He suggested that the team leave OPS on the schedule, but not to submit the OPS document until the system actually shows OPS.

Mr. Holmes said that the team needed performance criteria on which to base OPS. Mr. Ballard said that the two elements in MI ROD should be used to determine OPS. Mr. Holmes said that OPS needed to include the treatment area wells, plume wells and the sentry wells, as well as the performance metrics for each. Mr. Ballard said that success was defined by demonstrating that the system has achieved the remedial action objectives in the treatment zone and within the plume. Mr. Holmes suggested that Mr. DeLano put all the criteria together on the RA flow chart and not separate properly from successfully because you have to show both for OPS.

Mr. Ballard asked about plumelets outside treatment area and if there was a plan for the "one well hits." In terms of NPL deletion, Mr. Ballard said that DLA would need to show that all the wells were clean for four consecutive monitoring periods and he wanted to make sure the team was not ignoring those individual wells. Once system stabilizes, Mr. Ballard suggested that at some point samples should be collected from all the wells at same time, quarterly would be logical.

Mr. Holmes said that the completion report would have a final plume map to define wells for compliance monitoring and those wells would be used to show the system has met RAOs defined with four consecutive monitoring periods. Mr. DeLano said there was a varying sampling frequency and the team would have to look far enough ahead to get the wells outside the treatment areas that have shown low levels on a similar schedule. The work plan includes the decision points for BCT review.

Mr. Ballard said that the plume would determine the set of compliance wells and that those wells must have four clean periods. He said that once the system was getting close to RAOs then the team should increase the sampling frequency of other wells.

Mr. DeLano distributed logic flow diagrams for the RA. Injections would begin on a bi-weekly basis and establish anaerobic conditions. Once anaerobic conditions have been established, then the team would move into system optimization. Mr. Holmes said that the performance monitoring, field and lab, were not on the same schedule. Field would happen more often than lab.

Mr. Morrison brought the team's attention to phone conversation regarding maintaining conditions favorable to anaerobic conditions. He wants to see that the team achieves and maintains conditions for a specific time frame. He does not want to stop injections too soon in the process. Mr. Ballard said the four consecutive events was the "get out," and the flow diagram was for operating the system. During the phone conversation the team discussed stopping injections and letting the conditions assert themselves to see if it maintains MCLs.

Mr. Ballard said that if the injections were in the right spot, the former source areas, and meet MCLs. If additional source material reasserts itself, then the team would develop and implement a contingency plan. Mr. Holmes said MACTEC intended to maintain it for at least 6 months then stop and monitor. If levels go up, then evaluate and implement a contingency plan. He thought having rebound would provide information to find the source, deal with it and move on with the remedy. Mr. Morrison would rather see the whole system maintain for a while before turning it off. Mr. Holmes said MACTEC would keep the BCT informed and involved in any contingency planning.

Mr. Holmes said the idea behind the remedy was to meet MCLs in the treatment area and if it doesn't, then the team will discuss it. And if it becomes asymptotic, then the team will discuss it. Mr. Holmes said the team has focused on treatment zones, but now needed logic diagrams for compliance wells and performance of monitored natural attenuation. Mr. Ballard said any wells within the plume could be called compliance wells, or natural attenuation wells.

Mr. DeLano said that the discussion points were in the logic diagrams for the LTM wells. Mr. Sprinkle said the team's concern was that with the nearest performance monitoring well far from the treatment area that it may be several years before seeing reduction. Mr. DeLano said the team would have to look at where to place the performance monitoring wells so the team doesn't have to wait several years to see the effects of natural attenuation. The RD provides sufficient flexibility to achieve the goals.

RCRA Permit


Mr. Buxbaum thanked Mr. Holmes and MACTEC for producing a good permit application on time thereby avoiding a request for extension. He said that it might take TDEC awhile to review the application and renew the permit. Mr. Dobbs said the NOV had been resolved.

Next Meeting

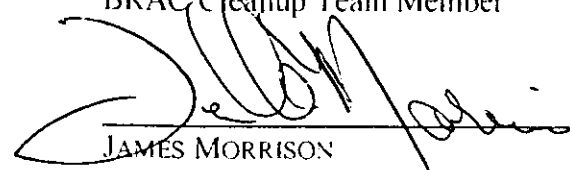
The BCT scheduled a teleconference on June 15 @ 1:30 PM EST for entire project team that Mr. Holmes will coordinate. The BCT scheduled the next meeting for July 20 and 21 at MACTEC's Kennesaw office. Mr. Dobbs and Mr. Holmes will discuss a teaming exercise for July 20.


MICHAEL DOBBS7-20-04
DATE

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