



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 869

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Final

Memphis Depot

BRAC Cleanup Team

Meeting Minutes

19 October 2006

BRAC Cleanup Team	Organization	Phone/email
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Turpin Ballard	Environmental Protection Agency, Region IV (EPA)	404.562.8553
Evan Spann	Tennessee Department of Environment and Conservation, Division of Remediation (TDEC-DoR)	901.368.7916
Project Team	Organization	Phone
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Debbie Young	General Services Administration	404.331.3625 404.680.0784
Tom Holmes	e ² M	404.237.3982
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David Nelson	CH2M Hill	770.604.9182 x394
Mike Perlmuter	CH2M Hill	770.604.9182 x645
John Miller	Mitretek Systems	703.610.2560

Previous Meeting Minutes

The BCT signed the final 28 September 2006 BCT meeting minutes.

Dunn Field 90% Source Areas Remedial Design (SARD)

Mr. Nelson inquired whether the BCT had any preliminary comments on the 90% SARD. Comments are due from the BCT on 14 November 2006.

Mr. Nelson reported that CH2M Hill was working on the Remedial Design Investigation Technical Memorandum (RDI TM), and he anticipated submitting it to the internal team on 3 November 2006 for 15-day review. This would result in an anticipated submittal date to the BCT on or before 11 December 2006.

The team discussed moving ahead with the Source Area remedial action (SA RA) prior to completion of the RD. The team discussed how long it could take to order and construct the equipment, and then to mobilize and construct the fluvial soil vapor extraction (SVE) system. The current master schedule indicated mobilization of the SA RA was planned for November 2007. The BCT agreed to expedite the SA RA, specifically the fluvial SVE system. Mr. Dobbs instructed e²M to work with the contracting officer at Air Force Center for Environmental Excellence (AFCEE) to revise the contract in order to move ahead with mobilization.

AI: e²M to provide an update and schedule at the 16 November BCT meeting regarding moving ahead with construction of the fluvial SVE system.

Dunn Field Land Use Control Implementation Plan (LUCIP)

Mr. Nelson reviewed the history behind the need for EPA and Department of Army (DA) to resolve issues regarding the Dunn Field LUCIP. CH2M Hill had submitted the LUCIP with the 60% SARD and with the 60% Off-Depot Groundwater RD. EPA Region 4 and EPA Headquarters provided comments, which were submitted to DA. CH2M Hill submitted responses to comments and submitted the revised LUCIP to the EPA based on input from DA. However, since the revised document no longer fulfilled EPA LUCIP guidelines, the EPA was unable to provide comments and would be unable to approve the document because the DA language changes were unacceptable to EPA. Mr. Ballard indicated that DA did not resolve the EPA comments; they simply revised the document language so that it was worded like the Main Installation LUCIP. Mr. Dobbs indicated that Mr. Richard Wirsing from the DA Office of General Counsel would be the DA point of contact and would work with EPA General Counsel, Martha Brock, to address and resolve EPA comments.

Mr. Nelson indicated that he had discussed the situation with Mr. John De Back of the DA BRAC Office and that CH2M Hill would revise the document in accordance with EPA's comments and resubmit it to DA for review.

Dunn Field Off-Depot Groundwater Remedial Design (RD)

Zero-Valent Iron Permeable Reactive Barrier (ZVI PRB) Implementation Study

Mr. Nelson briefly updated the team on the ZVI PRB Implementation Study and the TM, which he anticipated submitting to the internal team on 3 November 2006. He reported that the samples collected the week of 28 September 2006 indicated that all the monitoring wells were reacting geochemically as in the past. He had just received but not yet reviewed the chemistry data from that sampling event.

Off-Depot Groundwater Remedy Proposal

The team then discussed a proposal outlining new information collected since the signing of the ROD, which indicated a PRB was not the most effective remedy for the Off Depot plume. The proposal suggested the use of enhanced bioremediation treatment (EBT) in areas west of Dunn Field since it has been effective on the Main Installation. The BCT was in favor of the proposed alternative, acknowledging many details remained to be determined. The change in the alternative would result in a delay of three to six months in the submittal of the RD. The BCT agreed to move forward with an amendment to the Dunn Field Record of Decision based on the proposal.

Mr. Ballard indicated, and Mr. Spann agreed, that the arguments summarized in the proposal were sufficient to support a ROD amendment as well as a Request for Extension of the Off-

Depot Groundwater RD. They also noted that the team had worked hard to implement the ROD, but that a different approach was beneficial due to the new information, including the hydrogeology of the area and contamination levels down gradient of the proposed ZVI PRB location.

The team discussed how the PRB remedy in the ROD provided an aggressive approach for concentrations that were known at the time. Based upon the expanded knowledge, EBT seems to be a beneficial alternative to implement as a remedy for west of Dunn Field. The team then discussed the steps necessary to prepare the ROD amendment, to complete an RD for EBT down gradient of Dunn Field and to move forward with the RA work plan. Mr. Dobbs tasked CH2M Hill to revise the RD and tasked e²M to prepare the Request for Extension letter and ROD amendment.

The Request for Extension letter must include a description of good cause for the extension based on requirements in the Federal Facilities Agreement (FFA) and cite the FFA sections. The letter should note the BCT discussions and incorporate the logic outlined in the Off-Depot Groundwater RD Remedy Proposal, emphasizing the change in current knowledge of conditions. Mr. Ballard indicated that the letter should also mention the efforts made to adhere to the ROD. The letter must list the documents that would be affected by the delay and must mention that all subsequent submittal dates would be reflected on the upcoming draft BRAC Cleanup Plan master schedule.

Mr. Holmes asked if the Request for Extension letter should provide notice of the upcoming ROD amendment. Mr. Ballard and Mr. Spann responded that the letter should indicate the timing for the ROD amendment and the steps the team must take to implement this change including all the public involvement requirements. Mr. Holmes asked if the RD could be approved prior to completion of the ROD amendment public comment process. Mr. Ballard responded that the RD could be completed and approved by the BCT, but field work could not begin.

Mr. Ballard also indicated that there were two document tracks to consider - the decision document track and the RD track, and that the Request for Extension letter would start and document both tracks. He also reminded the team that the ROD amendment would require an Administrative Record index identifying the documents that support the ROD amendment.

The BCT agreed that the ZVI PRB Implementation Study TM should be listed in the ROD amendment Administrative Record as a stand-alone document as opposed to an appendix to the Off-Depot Groundwater RD.

The team then drafted the following preliminary schedule. e²M will review the schedule further with CH2M HILL and will include the appropriate dates in the Request for Extension letter.

Request for Extension Letter	Time
Draft	27 October 2006
Final	3 November 2006
Off-Depot RD	

ZVI PRB implementation study TM	11 December 2006
90% Off-Depot GW RD	April 2007
100% Off-Depot GW RD	August 2007
Final Off-Depot GW RD	October 2007
Source Areas RD (SARD)	
100% SARD	13 January 2007
Final SARD	April 2007
ROD Amendment	
Draft Proposed Plan	February 2007
Draft ROD amendment	February 2007
Final Proposed Plan	June 2007
Public comment period	July-Aug. 2007
Final ROD amendment	October 2007
BRAC Cleanup Plan	
Revise BCP/master schedule	1 December 2006
Final BCP/master schedule	February 2007

AI: CH2M Hill to revise the Off-Depot Groundwater RD per the meeting's discussion.

AI: e²M to prepare the Request for Extension letter and ROD amendment.

AI: e²M to evaluate the preliminary schedule drafted during the BCT, make necessary changes, and submit the draft BCP Master Schedule to the internal team ASAP.

Main Installation Remedial Action (RA)

Mr. Holmes reported that e²M was preparing the RA Construction Report following the guidelines for preparing an Interim Remedial Action Completion Report (IRACR). The Construction Report would include only the baseline and first round of groundwater sampling. Comments received on the Construction Report would be helpful in completing the RACR, which is to demonstrate that the RA is on target to meet the remedial action objectives and provide the basis for obtaining the Operating Properly and Successfully (OPS) determination. Mr. Holmes anticipated e²M would submit the Construction Report to Mitretek for internal review on 23 October 2006 and to the BCT about 2 weeks after receiving Mitretek comments.

Mr. Holmes then reviewed several figures showing the injection and performance monitoring wells, the groundwater flow in each treatment area, and groundwater sampling results. Mr.

Ballard requested that the RACR contain cross sections from the soil borings in order to see the variability in the clay surface. Mr. Miller suggested that the RACR also include a top of clay map.

Mr. Holmes indicated e²M would prepare and submit to the team quarterly sampling reports that would provide mainly data, with limited analysis. He reported that e²M had not encountered problems with injections in any of the wells, although a couple of the injection wells were dry.

Mr. Spann asked if e²M would evaluate the dry wells and propose installing additional wells into areas with water. Mr. Spann indicated that cross sections of the dry well area would be helpful. Mr. Ballard opined that the lactate injected into a dry well would flow along the top of clay until it reached water. Mr. Spann questioned if the lactate was getting where it was needed. Mr. Miller suggested the need to know the historical water level in the area. Mr. Holmes stated that the review would be provided in the quarterly report.

Main Installation Long Term Monitoring (LTM)

Mr. Holmes reported that e²M had installed nine new wells in six locations. He indicated that there was no longer a need to move MW62 per a previous request from the Depot Redevelopment Corporation due to the Building 835 expansion project. He reported that a full round of LTM sampling was currently in progress and had no data to present. e²M will prepare some cross sections based on the LTM well installation. Mr. Holmes presented figures showing the well locations and modifications to figures from the 2005 LTM report showing the new groundwater and top of clay elevations.

e²M will prepare a quarterly report for the new wells and the LTM sampling to address monitored natural attenuation and the LTM area. At that point, e²M would evaluate the need for additional monitoring wells. The newly installed wells would help to identify locations for the compliance well network as required by the RD and RAWP.

Mr. Dobbs asked how the recently collected data might impact the next Finding of Suitability to Transfer for the remainder of the MI. Mr. Holmes indicated that the FOST 5 timeline would follow the same timeline as MI IRACR. Mr. Ballard indicated that the MI OPS request must be comprehensive for the entire MI remedy. It must indicate that the LUCIP was working and that contaminant levels were decreasing in the isolated plumes that were not being treated with the EBT system. Mr. Holmes reported that e²M was on schedule for the IRACR, and assuming EBT and MNA are successful, receipt of OPS and completion of FOST 5 by the end of 2008 (FY09).

Wabash Avenue Preliminary Assessment/Site Investigation

Mr. Spann reported that TDEC had submitted the Site Investigation Report to EPA the first part of October 2006. The report indicated that the Wabash Avenue site was not the source of contamination at MW130, but that based on the potentiometric surface data the source was to the west. TDEC had already identified Cintas and Production Specialists as potential sources in the Hazard Ranking System pre-score and that they scored high enough to prompt an investigation. TDEC anticipated beginning the preliminary assessment/site investigation in the next few months with results by the end of September 2007. The team discussed inclusion of the TDEC wells in the water level measurements to be collected by e²M in the current semiannual sampling. Mr. Holmes will contact Mr. Spann for additional well information.

Dunn Field FOST 4 Property Sale

Mr. Duck reported that two bids were received by the DA, but they were unacceptable as they were well below the fair market value appraisal. The DA decided to bring in the General Services Administration (GSA) to assist with the marketing effort and to place the sale information on their website. Mr. Duck introduced Ms. Debbie Young as the GSA official handling the marketing efforts.

Mr. Duck had spoken with Barnhart Crane, who was interested in the entire Dunn Field area. Mr. Duck would provide Ms. Young with a list of companies interested in the property. Ms. Young indicated she was in the process of developing a brochure and the team provided input. Mr. Duck indicated that the DA was going to construct a fence to separate the FOST 4 area from the remaining area. Mr. Dobbs reported that DLA had already scoped and funded construction of a fence and access gate, but that they were waiting to see what happened with the sale. He indicated that the team must resolve the lock issue as access to the property must be restricted due to the ongoing environmental project. Mr. Spann asked how perspective buyers would accomplish the due diligence real estate requirement, meaning they must visually inspect the property. Ms. Young indicated that GSA was planning two open house opportunities and would allow interested parties access to the property upon request.

Mr. Dobbs asked who calculated the fair market value. Mr. Duck replied that the Corps of Engineers - Memphis District evaluated the property and calculated the value. Mr. Dobbs asked if the property would go through an open bid process. Ms. Young provided details about the process and indicated that the highest bidder would not automatically get the property if bids did not come close to the fair market value. She indicated that GSA would start the auction bidding at a minimum bid, and that GSA could change the auction terms at any time if it became apparent that the bids received were not near the minimum.


Mr. Dobbs asked if DA still intended to include the western portion of Dunn Field in the bid or expression of interest process. Mr. Duck reported that the marketing effort would recognize it as being available in the future, but that they did not intend to offer it as part of this auction package. Mr. Wagoner then indicated that if, and once, they had received an acceptable bid, then DA had 30 days to accept the bid and then 90 days to close it – to have the deed completed and filed.

Ms. Young reported that the auction was scheduled to start on 30 October on website – www.auctionrnp.com. It would last until DA received a reasonable bid. Once they received an acceptable bid, then GSA would set the end date for the auction. Ms. Young indicated that the bid process usually took several months. Mr. Dobbs indicated that Mr. Duck should notify him as soon as they made an award and DLA would then move forward with erecting the fence. Mr. Holmes indicated the need for time to obtain the road cut permit from the City and to construct the road and the access gate just west of the existing gate.

Mr. Perlmutter then provided a quick overview of the upcoming Source Areas RA and its impact on the western side of the property.

Next Meeting


The BCT scheduled next meeting for 16 November 2006 in Atlanta with the actual location to be determined.



MICHAEL DOBBS11/16/06

DATE

Defense Distribution Center
BRAC Environmental Coordinator
BRAC Cleanup Team Member



TURPIN BALLARD11/16/06

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Environmental Protection Agency
Federal Facilities Branch
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EVAN SPANN11/16/06

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