



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 874

**PUBLIC MEETING MINUTES  
THE FORMER MEMPHIS DEPOT  
REMEDIAL DESIGN FOR THE DUNN FIELD DISPOSAL SITES  
January 20, 2005  
1620 Marjorie Street  
Memphis, Tennessee**

A public meeting was held at 6:00 p.m. on January 20, 2005, at the South Memphis Senior Citizens Center located at 1620 Marjorie Street, Memphis, Tennessee.

**WELCOME AND INTRODUCTION**

MR. DOBBS: Good evening, and welcome. My name is Michael Dobbs, and on behalf of the Defense Logistics Agency and DLA, I would like to welcome you to tonight's presentation on the Dunn Field Disposal Remedial Design.

Tonight we're going to give you a presentation on the design, and we'll accept comments and answer any questions you have pertaining to the Remedial Design of Dunn Field only. If you have any other questions or comments pertaining to any of our other restoration activities, see Alma, and we'll take them and put them on a card and address them at a later time.

We have two presentations. We have a presentation that's going to be given by David Nelson from CH2M Hill. He'll be giving his presentation followed by Tom Holmes with MACTEC, who will say a couple of things, and then we'll open up with Q and A's.

So, with that being said -- and if you can hold off to all comments until after the presentation, we'll get all of your comments then. Okay, David.

MR. NELSON: Thanks Mike. The topic of discussion, of course, tonight is for the Dunn Field Disposal Sites Remedial Design. Just as some project background, most of us are aware that the Memphis Depot site

goes through the CERCLA (Comprehensive Environmental, Response and Liability Act) process. Currently for Dunn Field there is -- well, excuse me. The CERCLA process is made up of approximately six steps or key decision-making stages, and currently for Dunn Field we have gone through the Remedial Investigation Study, Proposed Plan and the Record of Decision. And we are at the end of the Remedial Design for the disposal sites, and then the next step after completion of this Remedial Design is the Remedial Action.

There are, however, a total of three Remedial Designs scheduled for Dunn Field. This includes the disposal sites, the source area RD (Remedial Design), and then the offsite groundwater RD. The final Dunn Field ROD (Record of Decision) was signed in April of 2004, and, of course, the ROD defines cleanup goals and the remedies to meet those goals. The remedies that were approved for soil and for groundwater for disposal sites specifically includes excavation, transportation and offsite disposal.

Now, the two other RDs that I mentioned briefly will be approved or actually reviewed and should be final in early 2006. These include the source areas, which includes a soil vapor extraction remedy, the zero-valent iron injection remedy and land-use controls, and then the offsite groundwater includes a permeable reactive barrier and monitored natural attenuation.

The Dunn Field Disposal Site Remedial Design was completed in May of 2004, and as part of that design process, before you can move into the Remedial Action, a public briefing is required. That's where we are now. In this public briefing we'll go through

the proposed schedule as well as review potential impacts such as noise, traffic disruptions, health and safety requirements, et cetera, that are associated with construction and for the Remedial Action activities.

The objectives of the Remedial Design for disposal sites includes preventing direct contact with the buried waste during site redevelopment, preventing groundwater impacts from buried waste, and then restoring the site to light industrial reuse. Currently the site is zoned for light industrial.

The remedy was selected based on its expediency, permanency and its moderate cost, and there is permanent risk reduction through removal of the soil and debris as compared to containment on Dunn Field.

Some compounds will remain on site. However, this is consistent with a reuse plan for a light industrial type zone, and then Remedial Action, of course, as part of the CERCLA process, will be reviewed on a five-year basis to ensure the protectiveness.

At the beginning of the Remedial Design we conducted a Pre-design Investigation. It started in September of 2003 and was concluded in December of the same year. The Pre-design Investigation included a geophysical survey to identify and locate 17 disposal sites which had been identified by the BCT (Base Realignment and Closure Cleanup Team) as requiring further investigation. Of these 17 disposal sites, 48 exploratory trenches and 17 test pits were conducted across all the sites, and during the excavation, samples were collected to characterize the various soil and the debris. Debris and soil were analyzed for the full spectrum

of compounds, and "full spectrum of compounds" is – EPA (Environmental Protection Agency) is the regulatory agency's total analyte list of total compound list, and the results of this, of course, are described in the Remedial Design.

The soil and debris will be excavated and transported for offsite disposal from sites 3, 4.1, 10, 13 and 31, and this is based upon the identification of key compounds during the Pre-design Investigation. These compounds include benzene, copper, lead, polycyclic aromatic hydrocarbons, or PAH's, and these are commonly tar, diesel fuel and some other petroleum compounds. Also identified were buried containers, such as drums, in the disposal sites.

The rationale for excavation is based on the remedial goals in the ROD. There are concentrations of compounds above guidelines for the industrial reuse, and then there are compounds that are below the guidelines, but the composition of that debris is unknown, i.e., contents of buried drums are not known at this time.

This map up here (Indicating) shows you disposal sites 3, 4.1 and 10. I also want to point out we have a poster board that's over here. Of course, you can't see it because you are sitting down, but if you get up close to it, it shows you all of the disposal sites listed there, all the disposal sites that were investigated during the Pre-design Investigation.

Sites 3, 4.1 and 10 are located in the northwest corner of Dunn Field. This is Kyle Street; the CN Railroad tracks which cross Kyle Street are located just northwest of this area. As you can see up here (Indicating), that Sites 10, 3.1 and 4 we also show the

approximate limits of the potential soil stockpile. The stockpile will be built during the excavation of these disposal sites, and, of course, the stockpile will have a plastic liner on the bottom, and then at night, after each day's activities are concluded, a plastic liner will be put over the top of the soil stockpile to prevent rain or anything else from leaking the material off.

Here's a map of Disposal Site 13. Site 13 is located in the north, central but western edge of Dunn Field. This area here is the corner of Menager and Kyle Street, MW-6 now, which is off the Depot. It's approximately 100 feet away or 200 feet away from Disposal Site 13.

MR. MORRISON: What was in 13?

MR. NELSON: What was in 13? Well, I would have to look at that map to tell you, to be honest with you. We can answer your question. This map also includes the approximate limits of the potential excavation, soil stockpile. All material excavated from 13 will be put into the soil stockpile. It will be treated the same as 3, 4.1 and 10 where -- as a plastic liner and a plastic cover that will be put on top at night.

This is Disposal Site 31. It is located in the southwestern corner of Dunn Field, just north of Dunn Avenue, and the old trucking facility is over here just to the west off this area. This map also includes the soil stockpile which will be generated and used during the excavation and material from Site 31.

All right, so, as part of the excavation activity, we plan on excavating approximately 2,290 cubic yards of soil and debris. Each of these sites -- well, actually, all of them combined we anticipate excavating for asphalt, PAH's, which once again, include you know; commonly include tar, diesel fuel and other petroleum

compounds. We also anticipate excavating glass bottles and drums, and these we anticipate containing acids and pesticides. And then we also have soil that will have benzene, copper and lead in it as well.

We expect that the Remedial Action will begin in the winter of 2005, which I am told that the schedule begins -- the mobilization will begin in early February or mid February of 2005. We'll start with mobilization of equipment, and once it's all on site, we will set the equipment up. Once that activity is completed, we will begin the excavation, transportation and offsite disposal of the soil and debris.

All of the soil and debris will be going to CERCLA approved landfills. At this time, anything that is sampled and is turned up or is classified as hazardous is scheduled to go to the Ken Waste Facility in Emelle, Alabama, and then anything non-hazardous is scheduled to go to South Shelby -- South Shelby Landfill.

Performance verification will be performed at the excavation, the limits of excavation within each disposal site for each excavation area. The Remedial Action also, of course, includes a safety plan where we identify air monitoring procedures, dust control measures, if necessary, personal protective equipment for the workers and personnel on site and cleaning protocol or decontamination protocol for equipment.

Once the excavation is concluded, site restoration activities will include backfilling, compaction, grading and landscaping, and then site demobilization will occur after all of those activities, and that's scheduled for spring of 2005.

The implementation and monitoring of land-use controls, which is part of the remedy, will be -- these land-use controls will be reviewed annually, and then, of course, the site is subject to the CERCLA five-year review.

And then, briefly, for the Memphis Depot overall, the Main Installation-- the Remedial Design has been completed for that site or for that area. That was completed in August of 2004. We did have a public briefing scheduled for October of 2004. Because we ran out of time, that has been rescheduled for spring or early summer of 2005.

And, as I said earlier, there are two other Remedial Designs for Dunn Field. One is the source areas and the offsite groundwater Remedial Design. Those are anticipated being completed in the spring of 2006. And that concludes the presentation period. I guess we will move on to the questions.

MR. HOLMES:

I'm Tom Holmes of MACTEC and we will be the Remedial Action contractor. We will, as David mentioned, plan to start the work around the middle of February. It will take about 35 days. We'll have about a week where we'll be moving the equipment onto the site. We will be surveying all of the excavation locations, setting up the equipment areas, the exclusion areas as to where we will be working.

Then there will be about two weeks of excavation where we will go to each site, excavate it. After we finish excavating it, sample it around the limits of the excavation and sample the material that was taken out for waste characterization. All of that material will either be stored in a roll-off box that will be covered or in the



waste piles, which will have plastic sheeting beneath it and plastic sheeting above.

Then there will be about a one-week process for once we've gotten the approvals from the landfills based on the analytical results for waste characterization samples and determined that we don't need to do anymore excavation, that we've meet the Remedial Action goals and the Record of Decision and then the Remedial Design. We will backfill all of the excavations, compacting the soils in them, re-grade the areas and grass, and then we'll remove the equipment.

So, we plan to be done by the end of March, and if there are any questions now, David and I would be happy to answer them.

MS. BROOKS: Basically, so, what you're saying is should the residents ask when they are seeing activity, just tell them it's basically excavation to determine whether things are as they should be or if they are not, but basically it's just discovery. Is that it? And then after that, with the covering and whatever, it's -- I'm trying to make it real simple.

MR. HOLMES: Sure. I understand.

MS. BROOKS: It's just for excavation purposes, to determine what's there, and then after that, if it's good, then we're going to basically wind it down. But the whole process is about, what, three weeks? I'm sorry. The end of March?

MR. HOLMES: The end of March. So about a month. Well, really, the discovery process has taken place, and that was what David was describing as the trenching that was done. So we have figured out the areas in the disposal sites that need to be dug up and taken off site because they don't meet the remedial goals. So this is the -- sort of the complete action for the disposal sites.

So it will be dug up, taken off site and disposed. The discovery is that if maybe the areas we think that needs to be dug up aren't quite big enough, then we will go ahead and dig up until we meet the limits of the excavation. And after this, then all of the soil action, as far as the surface soil for the disposal site, will be done, and that part of the Remedial Action for Dunn Field would be completed.

MS. BROOKS: So, we're just flowing on schedule.

MR. HOLMES: Yes, ma'am.

MS. BROOKS: Okay, thank you.

MR. HOLMES: Thank you.

MR. WILLIAMS: Okay, my question is: With all the excavation that was going on and all the chemicals in the soil, the chemicals that was in the soil, my question is did it ever exceed EPA levels or was the community at any point in any harm of what was in the ground or what was found at any point?

MR. HOLMES: The surrounding community -- I think in the Risk Assessment that was performed we determined the risk of leaving the materials in place for the sites themselves for people on the property. I think previously I think was the ATSDR (Agency for Toxic Substances and Disease Registry) study. I don't know if I can answer that question ---

MR. WILLIAMS: Okay.

MR. HOLMES: --- about the community.

MR. MORRISON: Let me try to clear up something. You were asking if the community was at risk.

MR. WILLIAMS: I said did it ever exceed the level in the community that anyone would probably be at risk, you know, the EPA level of what was being taken out of the soil.

MR. MORRISON: For someone -- for anyone to be at risk, they first have to be exposed to this.

MR. WILLIAMS: True.

MR. MORRISON: This was inside of the fence boundary, buried underneath the soil right there. So, to be exposed to it, you have to come into physical contact with it or near it, something like that.

MR. WILLIAMS: Well, the reason I asked that, too, is because he said that, you know, once they that start digging, and if they find that the area, you know, spreads a little larger, then that means they have to go a little farther to dig.

MR. MORRISON: Yes.

MR. WILLIAMS: So, he was saying that at one point they didn't know if the boundaries would just be right here or out here.

MR. BALLARD: Mondell -- Turpin Ballard. It's a standard procedure in cleanup when you're doing an excavation, you do the best you can to identify the limits ahead of time, how much you have to dig, but you also always -- you trust, but verify.

So you go back when you think you've got it all and take some samples to confirm that you got it all, and if there's a little area or an edge of the excavation that exceeds your cleanup levels, you grab that little bit of extra. And that's what he was talking about with going back and getting a little more. It's not cleanup, go back and get a little more until it meets the cleanup levels.

MR. WILLIAMS: Okay.

MS. PETERS: And they will use covers on these trucks when they are hauling this away; right?

MR. HOLMES: Yes, ma'am, they will, and the trucks will go out Dunn Avenue to Airways and then either to the interstate or on past the airport to South Shelby Drive. So, they won't be on major streets, not driving through Hays Road or any of the smaller streets in the area.

MR. TYLER: Stanley Tyler. I apologize for being late. Right here on "excavation requirements," I notice that you said that you're going to excavate 2,290 yards of cubic soil and that you found glass,

- bottles, acids and pesticides, benzene and copper. Are these pesticides from the condition and the levels that you find them in?
- MR. HOLMES: I think -- well, the levels that were found from pesticides were reported in the Remedial Design and other investigations that were done. So, I guess I'm not sure. The results have been reported to date, and then after we dig it up and take our samples, there will be a report of what we found in the soil, both in the waste we took off site and that we met the cleanup standards for the soil -- for the excavation once we finish. So, all of that will be reported in a Remedial Action Completion Report that would be available to the public.
- MR. TYLER: Also, I notice you said that nothing bigger than 55-gallon drums is allegedly supposed to be buried over here.
- MR. HOLMES: I think so, and I think in the drums in the trenches ---
- MR. TYLER: Trenches.
- MR. NELSON: Yes, during the disposal site Pre-design Investigation the largest container we found were all 55-gallon drums.
- MR. TYLER: Were they at least -- how many and what they were?
- MR. NELSON: They weren't excavated at the time. We left them in place. It was noted where they were. We left them in place. Once they do the Remedial Action, they will know how many drums they pulled out and what the contents are, if there are any contents.
- MR. TYLER: I was just noticing that. Because, you know, 55-gallon drums and the amount and how many and -- because the historical records sometimes on Dunn Field it is a question mark.
- MR. NELSON: Right.
- MR. TYLER: Okay, thank you.
- MR. HOLMES: If there are any liquids or materials in the drums, then we'll test those, and we'll have to have our over (unintelligible) that any containers would be put directly in -- not into the waste piles, but

into the over (unintelligible), and then that would be shipped off site.

MR. TYLER: I noticed some of these chemicals have a long shelf life, and that will be taken into consideration when you give your report? Like mercury, it's almost forever when you put it in the ocean. You know, I don't know what chemicals last in the ground, how long. So, when you dig them up, you say to the point until you take them out of the ground, they have been there so many years, they can only saturate the ground so far and so wide is what I'm getting at. That also will be ---

MR. HOLMES: Yes. The limit -- for what we found, the limits -- the area that was excavated, the width, length and the depth will all be reported and the results of what we found, and then the materials in the waste will be -- will follow the EPA and TDEC (Tennessee Department of Environment and Conservation) standards of whether it can go to a hazardous waste landfill or whether it can go to a non-hazardous waste landfill.

MR. WILLIAMS: One other question. When you get ready to excavate, what level of containment systems are you guys going to be wearing?

MR. HOLMES: We will be starting off in a Level D. It's wearing Tyvac coveralls just to keep the dirt off and hard hats and steel-toed boots and that sort of thing. And we will be doing the air monitoring in the areas next to the excavation as well as outside the area, downwind and upwind. And if we needed to up grade to Level C with respirators, then we will do that.

MR. TYLER: The reason I was asking the question, you've got a lot of people who live on the fence line, and they notice when you go from light containment to heavy containment, as to why, when and why. Because in the report it's presumed to be light containment, and that's going to read incorrectly.

MR. HOLMES: That's what we're going to ---

- MR. TYLER: So, if it goes to heavy containment, there will be some kind of notification as to why you're going from light containment to heavy or you guys will just switch over because you found something that's presenting more of a problem?
- MR. HOLMES: I don't think we would have a notification. We would notify EPA and TDEC that we had to change our plan. Now, we recommend that anybody, if they notice anything or have questions, please call Alma on the Community Relations Line, and we'll be happy to provide information about what's going on.
- MR. TYLER: Okay, thank you.
- MR. NELSON: Anything else?
- MR. HOLMES: Mike, I guess we're done.
- MR. DOBBS: If no one else has anything, this will conclude our public presentation. However, we'll stay around for five or ten minutes in case anyone has questions for the team. So this concludes our presentation.
- MS. MOORE: Excuse me. I just wanted to remind everyone of my new number. Some of the RAB members may not have had a chance at the session in December to get the new number for the Community Relations office. It's 774-3683. That's 774-3683, and my cell number, 573-1812. And you can give those numbers to your community members or anyone who has any inquiries about the activities at Dunn Field. It will last about 35 days. Thank you.
- MR. HOLMES: Thank you.

(Whereupon at approximately 7:15 p.m., the public comment period adjourned.)

**Attendance List**

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**ADMINISTRATIVE RECORD**

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