



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 913

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**Final**

**Memphis Depot**

**BRAC Cleanup Team**

**Meeting Minutes**

**15 November 2007**

BRAC Cleanup Team	Organization	Phone/email
Michael Dobbs	Defense Logistics Agency (DLA)/Defense Distribution Center (DDC) DDC-DES-EE	717.770.6950
Turpin Ballard	Environmental Protection Agency, Region IV (EPA)	404.562.8553
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Project Team	Organization	Phone
Angela Clark	e <sup>2</sup> M	404.799.1046
Tom Holmes	e <sup>2</sup> M	404.237.3982
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Craig Sprinkle	CH2M Hill	678.530.4333
David Nelson	CH2M Hill	678.530.4250
Mike Perlmutter	CH2M Hill	678.530.4271
John Miller	Noblis	703.610.2560

### ***Previous Meeting Minutes and Action Items***

The BRAC Cleanup Team (BCT) approved and signed the minutes from the 20 September 2007 meeting.

### ***Source Areas Remedial Action (SA RA)***

#### **Fluvial Soil Vapor Extraction (SVE) System**

Mr. Holmes reported that e<sup>2</sup>M had prepared a status report for the period from 19 September through 1 November; the report will be submitted following the BCT meeting. During the report period the system removed 159 pounds of volatile organic compounds (VOCs) with a total of almost 1,200 pounds of VOCs removed from the fluvial formation.

He noted that VOC emissions in the system effluent are less than 0.2 lbs per hour, and that effluent is no longer being treated. e<sup>2</sup>M converted the SVE system construction permit for air emissions to an operating permit and will maintain the permit in anticipation of the thermal-enhanced SVE system for the loess beginning operations soon.

Mr. Holmes reported that the blower operated properly until the end of October, but that one blower has operated intermittently since 27 October. The blowers are under warranty and e<sup>2</sup>M is working with the contractor and the manufacturer to repair or replace the blower. The system is currently running on one blower and continues to maintain a radius of influence of about 80 feet.

### **IRA System**

Mr. Holmes stated the IRA groundwater recovery system is operating properly at present. Semiannual sampling was completed in October 2007. The next groundwater sampling event is scheduled for April 2008.

### **Loess/Groundwater Remedial Action (RA) Work Plan**

Mr. Holmes reported that last week e<sup>2</sup>M completed excavation of TA1F, the area identified for excavation in the Source Areas RD. e<sup>2</sup>M removed the top 7 feet of soil. There was no visible staining or waste debris, so e<sup>2</sup>M staged the soil to the side, collected a soil sample and plans to use the soil as back for the excavation.

At about 8 to 9 feet below ground surface, e<sup>2</sup>M encountered a 6 inch layer of white material on the south and west walls of the excavation area. The white material had no smell and no apparent reaction to the surrounding soil. e<sup>2</sup>M collected a sample that will be analyzed for the Target Compound List/Target Analyte List. e<sup>2</sup>M also collected confirmation and waste characterization samples.

In the TA3 area where drums were encountered during installation of the SVE extraction well and conveyance piping system, contractors completed a geophysical survey and identified two areas with high metal concentrations. e<sup>2</sup>M excavated a number of test pits within these two areas to confirm the extent of the drums. e<sup>2</sup>M collected two soil samples from the test pits. The soil from under the drums within the test pits measured fairly low levels using Photo Ionization Detectors (PID). Soil sample results are pending. e<sup>2</sup>M plans to remove all the drums found during the survey and affected soil to a depth of 4 to 6 feet.

In a test pit in the northwest corner of the drum area, e<sup>2</sup>M encountered several small glass vials about 2 inches in length containing white powder. They removed and containerized the vials on the surface and stopped activity in the test pit. The Corps of Engineers has confirmed that the vials are not Chemical Agent Identification Sets (CAIS). e<sup>2</sup>M is working with Edgewood Chemical Biological Center to identify the substance within the vials.

While excavating the IRA groundwater pump and discharge system conveyance pipes in order to install thermal wrap to protect them from the loess thermal system, e<sup>2</sup>M encountered several small cardboard containers that were identified as M9A Identification Kits – the same as those encountered during installation of IRA pipes. The M9A kits do not contain hazardous substances. e<sup>2</sup>M collected the containers for proper disposal.

### **Northeast Plume**

Mr. Woods reported that TDEC has received funding from EPA to pursue an Expanded Site Investigation (ESI) of the Cintas property based upon the previous results.

Mr. Ballard indicated that until TDEC/EPA identifies and places a PRP under an enforceable order to deal with their contamination, then EPA cannot concur on the Operating Properly and Successfully determination for Dunn Field or on a Finding of Suitability to Transfer for that area. Mr. Woods indicated the goal of TDEC's investigation is the identification of a PRP and

issuance of an enforceable order. ESI activities are funded for this fiscal year, so Mr. Woods anticipates continuing investigation activities in Spring 2008.

### ***Off-Depot Groundwater Remedial Design (RD)***

#### **Intermediate Aquifer Investigation (IAI)**

Mr. Nelson reported that in October CH2M Hill's contractors installed 6 intermediate aquifer wells and 4 fluvial aquifer wells, and he provided the cross sections prepared from the IAI well installation. The new wells encountered the geological formations as in the other surrounding wells. The clay layer was encountered as expected in the new wells.

CH2M Hill collected groundwater samples and has received preliminary results that indicate the presence of chlorinated VOCs in intermediate aquifer well MW232. To confirm this result, e<sup>2</sup>M will collect additional samples from MW232.

Mr. Nelson continued that preliminary results do not indicate significant communication between the two formations. More importantly, the groundwater model included assumptions regarding the communication between the two formations that the IAI has shown are not supported. CH2M Hill will input these data into the groundwater model, which is an important part of Final Off-Depot Groundwater RD.

**AI: e<sup>2</sup>M to collect samples from MW232 in conjunction with sampling event in early December.**

#### **Enhanced Reductive Dechlorination (ERD) Microcosm Study**

Mr. Perlmutter reported that the ERD Microcosm Study is in the second phase that started in August 2007 using High Fructose Corn Syrup (HFCS) and Hydrogen Reducing Compound-Advanced (HRC-A). The last sampling event is scheduled for November 27, 2007. **Final**

#### **(100%) Off-Depot Groundwater RD**

Mr. Holmes reported that on 7 November 2007 DLA submitted to EPA and TDEC a Request for Extension for the Rev.0 Final (100%) Off-Depot Groundwater RD.

The team discussed implementing the Monitored Natural Attenuation (MNA) portion of the remedy prior to any other remedial activities off depot based on the anticipated effect of the Source Areas remedy on the groundwater plume as well as the preliminary results of the IAI that indicate the groundwater plume is stable and is not migrating from the fluvial aquifer to the intermediate aquifer.

The team agreed that the additional data from the groundwater model are necessary to present the information regarding implementing MNA.

The BCT concurred that the submittal date of 17 November 2007 for the Rev. 0 Final (100%) Off-Depot Groundwater RD will not be enforced because the Request for Extension has been submitted.

**AI: EPA/TDEC to submit to DDC a written response to the 6 November 2007 Request for Extension. ASAP.**

**AI: EPA to submit to DDC comments in writing for the Rev. 1 Pre-Final (90%) Off-Depot Groundwater RD. ASAP.**

**Revised Proposed Plan and ROD Amendment**

The team discussed and the BCT agreed that the next revision of the Dunn Field Revised Proposed Plan will be Rev. 2 and that the next revision of the Dunn Field ROD Amendment will be Rev 1. The review period for each document will be the same as for a Rev. 0 (60 days).

**Dunn Field Land Use Control Implementation Plan (LUCIP)**

Mr. Nelson reported that EPA Region IV and EPA HQ have received the latest revision of the LUCIP from the Department of Army and are working to resolve issues in the language used by the Army.

**Main Installation****Long Term Monitoring (LTM)**

Mr. Holmes reported that e<sup>2</sup>M completed the LTM annual sampling event in October, but analytical results have not yet been received.

**Small Main Installation Plumes**

Mr. Holmes reported that e<sup>2</sup>M is evaluating other potential soil source areas at the Main Installation. The evaluation includes the Target Treatment Areas 1 and 2, and the MW39 area. e<sup>2</sup>M will draft a recommendation and scope of work that will be submitted to AFCEE and DDC in December with a work plan to follow.

**Miscellaneous****Dunn Field FOST 4 Property**

Ms. Clark reported that the deed for the FOST 4 area has been signed and was recorded with the Shelby County Registrar on 4 October.

**Five-Year Review**

Mr. Holmes reported that on 18 October 2007 e<sup>2</sup>M received EPA's comments on the Rev. 0 Five-Year Review. e<sup>2</sup>M has not received comments from TDEC. Mr. Woods noted that he is awaiting comments from Mr. Evan Spann and Mr. Jim Morrison and that he anticipates submitting comments next week.

Mr. Holmes indicated that the Rev. 1 is to be submitted on 27 November 2007, but that e<sup>2</sup>M has not revised the document as they have not received all the regulator comments. Upon receipt of TDEC comments, e<sup>2</sup>M will begin preparing response to comments adhering to the time period prescribed by the Federal Facilities Agreement.

**AI: DDC submit an extension request letter for the Rev. 1 Five-Year Review. By 17 November 2007.**

**BRAC Cleanup Plan**

Mr. Holmes reported that e<sup>2</sup>M is preparing the Rev. 0 BRAC Cleanup Plan. e<sup>2</sup>M has recommended to DDC that submittal of the document be delayed due to the need to resolve issues regarding the Off-Depot Groundwater RD and master schedule prior to completing the document.

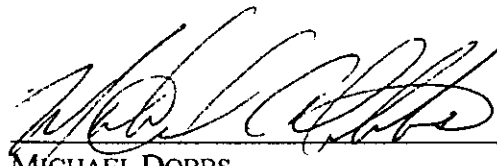
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**AI: DDC submit a Request for Extension for the Rev. 0 BRAC Cleanup Plan. By 20 November 2007.**

***Next Meeting***

The next BCT meeting is tentatively scheduled for 24 January 2007 in Memphis, TN. The Project Team meeting is scheduled for the afternoon of 23 January 2007.

**AI: e<sup>2</sup>M to send the BCT a schedule of field activities for the week of 24 January 2007. By 8 January 2007.**



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BRAC Environmental Coordinator  
BRAC Cleanup Team Member

1/24/08  
DATE



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