



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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FINAL

**Memphis Depot
BRAC Cleanup Team
Meeting Minutes**

3 April 2008

BRAC Cleanup Team	Organization	Phone/email
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Project Team	Organization	Phone
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Previous Meeting Minutes and Action Items

The BRAC Cleanup Team (BCT) approved and signed the minutes from the 24 January 2008 meeting.

Dunn Field

Source Areas Fluvial Soil Vapor Extraction (SVE) System

On 14 March 2008, e²M submitted to the BCT the Quarterly Fluvial SVE Operations Summary that covered the operating period of 28 December 2007 through 1 February 2008. Mr. Holmes reported the system removed 237 pounds (lbs) of Volatile Organic Compounds (VOCs) during the operating period for a total of 1,890 lbs of VOCs removed since system start up in July 2007. e²M collected Groundwater Interim Remedial Action (IRA) samples in October 2007. In November 2007, CH2M Hill collected additional groundwater samples for use in the Off-Depot

Groundwater Remedial Design. Using data from 33 wells within the SVE system area of influence and down gradient of the system, e²M evaluated the effect of the Fluvial SVE system on groundwater contamination levels.

Mr. Holmes presented preliminary contamination level trend plots of the 33 wells. More than half the wells had decreasing trends with only a couple with increasing trends. The team reviewed and discussed the data. e²M will submit to the BCT the results of this evaluation next week.

On 20 March 2008, e²M began a rebound test of the Fluvial SVE system to evaluate possible methods for optimizing the system. The next Quarterly Fluvial SVE Operations Summary will include the results of the rebound test.

Source Areas Remedial Action Work Plan (RAWP)

The Source Areas RAWP will be revised to include the verbiage agreed upon in January 2008 regarding the evaluation of non-detect results and the collection of additional confirmation samples from the upper five feet in LSB25 in TA-1E, LSB22 and LSB23 in TA-4.

Source Areas Loess/Groundwater Thermal SVE

Memphis Light, Gas and Water (MLGW) has confirmed to TerraTherm that power service will be completed by 25 April. The system will then undergo a two week testing cycle. TerraTherm has continued installation of the system including secondary power connections. The thermal SVE system is anticipated to be fully operational by mid-May and will be monitored both locally and remotely.

The heating period is 105 days with the first round of samples to be collected after about 70 days of heating, depending upon treatment system results. The third sampling event is to occur after completion of the heating period and soil cooling. The plan includes an additional 30 days of heating, if necessary.

The team discussed the confirmation samples collected after excavation, transportation and disposal (ET&D) at areas TA-1F and TA-3. There is a small area of soil containing chloroform at levels above remedial goals (RGs) remaining in TA-1F. An overlying stormwater drain limited access during the initial excavation. e²M will make plans to excavate the remaining soil with chloroform from TA-1F; the stormwater drain will be replaced following the additional excavation.

Given the nature of the construction debris at the TA-3 excavation site, e²M will re-address polyaromatic hydrocarbon (PAH) levels after completing the thermal SVE treatment. e²M will prepare a sampling plan to further define the extent of PAHs and then develop a plan to achieve the RGs.

AI: e²M to notify the BCT three weeks prior to all field work (including additional excavation at TA-1F and TA-3).

Groundwater Interim Remedial Action (IRA)

On 14 March 2008, e²M submitted to the BCT the Annual IRA Operations Report summarizing operations during 2007. IRA operations removed approximately 39.7 lbs of Trichloroethene (TCE) and approximately 87.4 lbs of Total VOCs.

The BCT discussed the possibility of turning off the IRA after start-up of the Fluvial SVE system based upon the recent groundwater results. This will be reviewed after receipt of groundwater results from the April IRA sampling event. The BCT also approved the IRA report recommendations to include the newly installed monitoring wells in the IRA semi-annual

sampling event and to replace the dual permeable diffusion bags (PDB) with one PDB during the IRA sampling event.

EPA commented that the objective of the final confirmation groundwater samples is that the results should be applicable to the exposure scenario of a drinking water well, so samples should be collected with the type of pump used in a drinking water well.

Northeast Off-Depot Plume

Mr. Woods reported that TDEC is preparing to conduct a passive soil gas survey at Cintas in May 2008. According to Mr. Woods, TDEC is intent on locating the source areas and, if possible, removing the sources of the groundwater contamination migrating on to Dunn Field.

The results of the passive soil gas survey could potentially lead to TDEC promulgating an enforcement action against Cintas or the results could indicate the need for additional investigation to the east for another up gradient source. Mr. Woods will request another round of groundwater sampling in order to facilitate either an enforcement action or continued investigation.

Regarding the impact on DLA's ability to transfer the remaining Dunn Field property if no source is identified, Mr. Ballard and Mr. Woods will continue to discuss the issue of transferring the property with their respective legal departments. Mr. Woods will also endeavor to facilitate additional investigation to identify the source area.

AI: TDEC and EPA to continue discussions with their respective legal departments regarding DLA's ability to transfer property situated over a co-mingled plume.

Dunn Field Land Use Control Implementation Plan (LUCIP)

Mr. Dobbs has requested that the Southern Regional Environmental Office mediate the LUCIP language issue between the Department of Army (DA) and EPA. The BCT discussed and agreed that CH2M Hill will complete the Rev. 0 100% Off-Depot Groundwater Remedial Design with the current DA version of the LUCIP in order to meet the primary document submittal date.

AI: Mr. Ballard to discuss with EPA legal department that the Rev. 0 100% Off-Depot Groundwater RD will contain the current DA version of the LUCIP.

Off-Depot Groundwater Remedial Design (RD)

Rev. 0 Final (100%) Off-Depot Groundwater RD

CH2M Hill provided information regarding the current proposed remedial design of air sparging/SVE for the Off-Depot groundwater plume.

CH2M Hill presented draft figures of the air sparging/SVE system layout being developed for use in the Rev. 0 100% Off-Depot Groundwater RD. The goal is to treat the core of the plume at the distal end near the MLGW substation. The BCT discussed the remedy including the assumptions and concepts used to design the air sparging/SVE layout and for operating the system.

The BCT discussed the method of ROD modification required to document the change in remedy. The alternatives discussed were a ROD Amendment or an Explanation of Significant Differences (ESD). A public comment period and meeting would be required with either method of ROD modification.

The BCT discussed and agreed to include in the RD verbiage regarding vapor intrusion in response to TDEC's recent comments on pending vapor intrusion guidance.

AI: Mr. Ballard to discuss with legal department the appropriate method for modifying the Dunn Field ROD.

Main Installation

Remedial Action (Enhanced Bioremediation Treatment [EBT])

Mr. Holmes reported he is reviewing the Annual MI RA Report and anticipates submitting the report to EPA and TDEC in mid-May. He presented time series figures that will be included in the Annual Report depicting the effects of EBT injections on contamination levels. Overall, the trends indicate reduction of the contaminants. e²M will continue to monitor and evaluate the need for additional treatment to reduce cis-Dichloroethene levels in order to achieve the RGs.

AI: e²M to add the maximum concentration values to the EBT trend time series plots.

Long Term Monitoring (LTM)

On 14 March 2008, e²M submitted the October 2007 LTM Sampling Summary to the BCT. e²M anticipates submitting the January 2008 Sampling Summary to DDC soon.

Main Installation Source Area Evaluation

e²M is completing the Main Installation Source Area Evaluation Work Plan. e²M presented figures identifying the areas to be evaluated and indicated the plan will look to identify sources within the areas. e²M will then prepare an evaluation report to include recommendations regarding the strategy for addressing the source(s). The evaluation report will also include recommendations for the compliance well network locations.

PCP Dip Vat

Mr. Woods stated that TDEC considers the PCP Dip Vat issue resolved. No further action is required for the PCP Dip Vat.

AI: TDEC to provide a letter stating resolution of the PCP Dip Vat issue.

MLGW Data

Mr. Woods has spoken with the MLGW attorney who indicated that requested data continue to be protected due to pending lawsuits. TDEC's attorney has also contacted MLGW's attorney and will eventually obtain the information, but it may not be timely for this project. The BCT concurs that it is appropriate and acceptable to move forward with conclusions and recommendations made for the Off-Depot Groundwater RD based on the current data and assumptions.

Miscellaneous

Deliverables Matrix

AI: Distribute matrix with final BCT meeting minutes.

BRAC Cleanup Plan (BCP) Version 11 Master Schedule Review


The BCT agreed that no revision to the master schedule is necessary at this time, but they will revisit the issue at the next meeting.

Next Meeting

The next BCT meeting is tentatively scheduled for 12 June 2008 at the CH2M Hill office in Atlanta, GA. The project team meeting will begin the afternoon of 11 June 2008.

MICHAEL DOBBS6/5/08
DATE

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BRAC Cleanup Team Member

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