

Final

BRAC Cleanup Team

Meeting Minutes

September 18, 2003

BRAC Cleanup Team	Organization	Phone
John De Back	Defense Logistics Agency (DLA)/DDSP-D (Memphis)	901.544.0622
Turpin Ballard	Environmental Protection Agency, Region IV (EPA)	404.562.8553
Project Team	Organization	Phone
David Buxbaum	U.S. Army SREO	404.524.5061
Karl Blankinship	U.S. Army Corps of Engineers - Mobile	251.682.7546
Bruce Railey	U.S. Army Corps of Engineers – Huntsville	256.895.1463
Chris King	U.S. Army Corps of Engineers – Huntsville	256.895.1843
Stephen Offner	CH2M HILL	770.604-.9182 x302
David Nelson	CH2M Hill	770.604-.9182 x394
Virgil Jansen	Jacobs Engineering	865.220.4933
Kraig Smith	Jacobs Engineering	931.393.6448
John W. Anthony	Mitretek Systems	303.779.2688
Robert Edwards	Mitretek Systems	210.408.5552
Denise Cooper	C&A, Inc.	901.767.1249

RCRA Permit Status

Mr. Buxbaum reported that he and Mr. DeBack met with TDEC. The Depot will probably follow TDEC's suggestion to submit a permit renewal application deferring RCRA corrective actions to the CERCLA program. TDEC wants remedial actions to be in place before terminating the permit. Mr. Buxbaum anticipates receiving correspondence soon from TDEC regarding the permit and will then submit the application. He anticipates successful closure of the issue.

Land Use Control Implementation Plan (LUCIP)/LUC Dispute Status

Mr. Buxbaum thanked Mr. Nelson for his work on the Rev. 5 LUCIP to incorporate informal comments from EPA. Mr. Buxbaum met with EPA and reviewed comment responses. Mr. Buxbaum identified, and the team discussed, changes to the document including language regarding land-use zoning institutional controls, notice of land use restrictions, groundwater use

restrictions, distribution of deeds to EPA, and land-use control/restriction monitoring requirements. Rev. 5 LUCIP will be included in the Rev. 0 Main Installation RD.

BRAC Cleanup Plan (BCP) Update

Ms. Cooper reported that the Rev. 0 BCP Version 7 was distributed on September 7, 2003 for 30-day review and that EPA has provided comments.

Master Schedule

The team discussed the master schedule and EPA guidance for closure documents. Mr. DeBack, Mr. Offner and Mr. Ballard will work together on primary document and milestone schedules.

Main Installation (MI)

Enhanced Bioremediation Treatability (EBT) Study

Mr. Nelson indicated CH2M Hill was drafting the EBT technical memorandum. Mr. Edwards presented his interpretation and evaluation of the groundwater data. He indicated that the lactate treatment produced reducing conditions with a couple of exceptions where groundwater movement may have impacted the concentrations. Within the vegetable oil area, Mr. Edwards' evaluation indicated slower reducing conditions than with lactate. The team discussed injection techniques and geohydrological influences of each injection material on contaminate reactions.

CH2M Hill and Mitretek have come to similar conclusions regarding the results of the EBT study. The team discussed various delivery system issues for each injection material. The BCT agreed, based on the independent analysis of Mitretek and CH2M Hill, that lactate should move forward in the MI Groundwater RD.

Mr. DeBack requested a cost analysis comparing injected material vs. time to OPS benefits for each injection material. Mr. Nelson indicated the RD would include the necessary comparison.

Remedial Design (RD)

Mr. Nelson reported that CH2M Hill is preparing the Rev. 0 Main Installation Groundwater RD. The team discussed the initial EBT injection system design elements, specifically injection/recovery well locations, and specific information EPA wants to see regarding specific use of each well. Mr. Nelson indicated that there is little flow data at the Police Station and suggested a pump test to collect data in order to optimize the remedy and potentially save money by eliminating injection wells. The BCT also discussed Mr. Buxbaum's conversation with TDEC regarding a recirculating groundwater remedy and Memphis/Shelby County groundwater ARARs. The BCT determined that TDEC would approve a recirculating system and that the ARARs allowed it.

Finding of Suitability to Transfer (FOST) 3

Mr. DeBack reported that the FOST has been submitted for review.

PCP Dip Vat/Site 21 Soil Samples

The BCT discussed CH2M Hill's response to a comment from Mitretek and COE regarding sampling for aerobic breakdown products. Mr. Offner reported that TDEC had approved the work plan. Mr. Railey reported that the COE safety office had accepted the Site 21 work plan. The team will move forward with both collection efforts.

Dunn Field***Hays Road Easement***

Mr. Blankinship reported that the City is awaiting results from the Site 21 TCLP samples. Mr. Offner reported that sampling is scheduled for week of September 22.

Ordinance/Explosives (OE) Clearance Statement

Mr. DeBack has received the clearance letter and forwarded it to DLA. Mr. Blankinship reported that the safety plan has been signed.

Disposal Pits Pre-Design Field Work

Mr. Smith reported completion of the geophysical survey, and that there are several pits that do not show up as anomalies. Fieldwork will continue to dig test trenches across anomalies or suspected disposal pit areas that did not show up as an anomaly. Mr. Smith will coordinate a meeting with CH2M Hill and NEVA to locate suspected disposal pits. Mr. Nelson will provide information to Mr. Buxbaum and Mr. DeBack to obtain geophysical data collected by Parsons Engineering during the CWM field investigation. They will obtain the data.

Dunn Field Groundwater Treatability Study

Mr. Offner presented the outcome of discussions with Mr. Edwards and impacts to elements of the study. He also discussed impacts to the study schedule with a requested start date of October 26. Mr. Offner anticipated distributing the draft work plan on Monday, September 22. He requested that the BCT and Mitretek provide approval/comments for the well locations in order for well installation to occur and sampling to begin around October 26. Mr. Buxbaum indicated that Mr. Offner was not required to obtain well permits.

Remedial Design

The team discussed timing of each proposed phase of the remedial action – disposal pit removal, ZVI, SVE and PRB. Disposal pit removal must occur prior to installation of the ZVI borings as some borings may go through suspected pit areas. Some of the ZVI borings can then be used for the SVE. The PRB can go in anytime. Mr. Ballard suggested that the schedule show milestones for each action (ZVI, SVE) rather than showing action phases under each type of document (design, action plan).

Record of Decision

The team discussed and resolved several of Mitretek's Rev. 0 ROD comments. CH2M Hill will include contingency framework language in ROD with a logic-flow diagram to provide process for changing the remedial action or implementing waivers if the remedy does not appear to meet the ARARs.

Next Meeting

The BCT scheduled the next meeting for October 16, 2003, in Memphis, TN. At this time, there are no tasks for CH2M Hill at the October RAB meeting.

SIGNED 10/16/03
JOHN DEBACK DATE
Defense Logistics Agency/Defense Distribution Center (Memphis)
BRAC Environmental Coordinator
BRAC Cleanup Team Member

SIGNED 10/16/03
TURPIN BALLARD DATE
Environmental Protection Agency
Federal Facilities Branch
Remedial Project Manager
BRAC Cleanup Team Member

SIGNED by T. Ballard for J. Morrison 10/16/03
JAMES MORRISON DATE
Tennessee Department of Environment and Conservation
Memphis Field Office
Division of Superfund
BRAC Cleanup Team Member