

Final

Memphis Depot

BRAC Cleanup Team

Meeting Minutes

January 15, 2004

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Project Team	Organization	Phone
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Land Use Control Implementation Plan (LUCIP)/LUC Notification

Mr. DeBack stated that Mr. Buddy Wagoner should have draft LUC notification for the State of Tennessee ready for review in a couple of weeks. It won't be filed until reviewed by the team. EPA HQ has reviewed Rev. 0 Version 7 LUCIP and provided comments. EPA's comments included requirements for lease restrictions to contain the land use restrictions and 72-hour notification of LUC violations. Mr. Buxbaum said the Army had accepted the EPA changes with some minor adjustments. The LUCIP will go back to EPA in the next few weeks for their concurrence. Mr. Buxbaum anticipates concurrence in the next few months. Army and EPA plan to use this LUCIP as an example for other facilities.

Mr. Buxbaum discussed with Mr. Morrison the State's involvement with the LUCIP review.

RCRA Permit Status

Mr. Talele reported that MACTEC is waiting for funding in order to complete the draft.

Master Schedule

Mr. Talele presented the deliverable matrix that incorporated comments. Mr. Talele will update the schedule based on today's meeting and distribute it on 1/16/04. Mr. Talele will distribute the schedule as both PDF and Excel files. Mr. Ballard concurred that this schedule matrix fulfills his need for a deliverable and task schedule.

Document Review and Comment Protocols

The team discussed that DLA will complete its internal review prior to submitting documents for regulator review and how to handle internal review comments to facilitate document submittal. Mr. Ballard suggested that when distributing the Rev. 0 document to include the internal review comments. He can see and respond to the text and the comment.

Main Installation (MI)***Monitoring Well 66***

Mr. DeBack directed the contractors to proceed with abandoning MW66 during the upcoming LTM activities.

Remedial Design (RD)

The team discussed Mr. Morrison's comment regarding an LTM well upgradient of MW62 based on historical drum storage and one vinyl chloride level in MW62. He did not see it on the proposed well list and wondered if it would go in now or later. The BCT agreed for MACTEC to resample MW62 during the February LTM activities then the BCT will develop a strategy based on the sample result.

The BCT agreed to the proposed LTM and abandonment wells in the Rev. 0 RD. Mr. Morrison indicated that, based on recent sampling data, TDEC was not going to conduct a groundwater investigation offsite of the MI southwest corner; therefore, TDEC did not need those offsite MWs.

CH2M Hill has received all BCT comments on the EBT.

RA work plan

The BCT agreed that MACTEC will move forward with the RA work plan in conjunction with the 90% RD.

Findings of Suitability to Transfer (FOST) 3 and 4

EPA has requested, and DLA has approved, an extension on the review of FOST 3. Mr. DeBack identified the need for the Environmental Protection Provisions to state that lessees must abide by deed covenants. Mr. DeBack anticipates starting FOST 4 this year. MACTEC is awaiting award of funds.

PCP Dip Vat Soil Samples

Mr. Nelson distributed the technical memorandum and Ms. Kim Lee Murphy, who authored the TM, discussed the findings. Dioxin levels were below the EPA action level for human exposure. PCP fate and transport modeling results were presented in the TM. Both average and maximum

PCP concentrations were evaluated with and without biodegradation. In all scenarios, model-predicted PCP concentrations in groundwater were below MCLs at Allen Well Field. Additionally, the model scenarios that incorporated conservative biodegradation assumptions indicated that on-site PCP concentrations in groundwater would be below MCLs, which correlates to the existing site data.

Based on sampling results, CH2M HILL recommended no further investigation activity for soils, and TDEC concurred. The report went on to say that monitoring wells for the PCP dip vat were appropriate and that these wells would be installed during the LTM program, and TDEC concurred. Mr. Morrison will provide comments to CH2M Hill on January 16, 2004.

Dunn Field

ZVI Pilot Test Study

Mr. Offner updated the team on recent field sampling data. The first post ZVI injection groundwater data indicates reduction of contaminant levels, with a couple of exceptions, within 11 days of injection. The team discussed the results and potential explanations for increased levels in MWs 74 and 134. Mr. Offner is awaiting December analytical results in order to determine if there are any trends. The next sampling events will occur in February and April.

ROD

Mr. DeBack requested that Mr. Buxbaum's review ensure that the document complies with the DOD guidance in order to complete DLA review and obtain DLA signature. Mr. Ballard indicated that EPA has TDEC's review proxy. Once EPA was satisfied with the document, in consultation with and as approved by TDEC, then TDEC should concur with the decision document.

The team discussed EPA and MACTEC comments and EPA's input on MACTEC's comments. Mr. Talele indicated there were no technical issues resulting from EPA's input. Mr. Buxbaum and Mr. Dobbs discussed Mitretek comments regarding MCLs as groundwater RAOs and changing the Dunn Field groundwater remedy to natural attenuation with ICs. Mr. Buxbaum reiterated that the State's groundwater use criteria classified the groundwater as general use. He also stated that the State had identified the Safe Drinking Water Act as an ARAR; therefore, MCLs will be the RAO.

Mr. Offner will distribute Mitretek's comments to the team and responses worked with Mitretek at the September 2003 BCT meeting. Mr. Offner will continue working the ROD. Mr. Morrison and Mr. Ballard both indicated that it would be nearly impossible to change the groundwater use classification or the ARAR.

Mr. Dobbs will discuss the situation with DLA and, if necessary, will coordinate a meeting with DLA, Mitretek, EPA and Mr. Buxbaum to bring this issue to a close.

Mr. Talele will update the final executed ROD date based on EPA's request for extension.

Hays Road Easement

Mr. DeBack reported that Mr. Harold Duck has drawn up the easement and should distribute it next week. Upon receipt, Mr. DeBack will forward it to MACTEC. Mr. Wrenn has coordinated with the City. The City's contractors have started work and want to meet around the end of

January to discuss where they are going to disconnect and replace the recovery system discharge pipe. The system will be down for a period of time.

The city's contractors will raise the height of the monitoring wells within the easement area. Mr. DeBack suggested that MACTEC monitor this to ensure the contractors do not impact the water quality within the wells. MACTEC will calculate the contaminant mass and extent that will move past the system due to the loss of capture during system shutdown in anticipation of RAB questions. MACTEC will notify EPA and TDEC of the recovery system shutdown to include shutdown start and anticipated end dates. Mr. DeBack tasked MACTEC to monitor the Dunn Field fence during this project to ensure a temporary fence is erected and maintained.

Groundwater Recovery System

Mr. Wrenn reported that MACTEC has taken over O&M with their first visit on January 5. They found and are repairing a damaged pump. MACTEC is enhancing the current system monitoring software and are purchasing a replacement laptop because the new software is not compatible with the current laptop software. Until the replacement laptop arrives, they are manually monitoring the system. Quarterly effluent sampling will occur in February with the next full round of sampling in April.

Rev. 0 Remedial Design Work Plan

CH2M HILL has received comments on the Rev. 0. CH2M HILL will respond to the comments and revise the document with hopes of distributing Rev. 1 as the final. Mr. Ballard commented that EPA guidance recommends the design include an O&M plan, but conversations with his peers indicate an annotated outline or a "straw man" of O&M along with a sampling plan will suffice.

Disposal Pits Technical Memorandum

Mr. Nelson presented information from the TM. CH2M HILL calculated estimated waste to be removed based on RG exceedances and principal threat wastes. The BCT agreed for CH2M HILL to reevaluate the RG for PCP using the HELP and MULTIMED models. EPA and TDEC stated that they would evaluate the acceptability and consistency of methods used or potentially used to address PCP at the Depot and get back with CH2M HILL. Additionally, the team discussed the potential use of SVE to address PCP. CH2M HILL will distribute the Rev. 0 Disposal Sites RD with a caveat that the affected estimated volume may change in the Remedial Action Work Plan. The TM will be incorporated into the RD Work Plan, and the team anticipates the Rev. 1 will be the final RD.

Off-Site Groundwater Migration

Mr. Morrison reported that TDEC has initiated a pre-CERCLA screening under the PA/SI process of the suspected groundwater contamination source upgradient of Dunn Field named the Wabash Avenue Investigation.

PRB Treatability Study

Mr. Offner reported that the preliminary results from the bench scale study look very good. GeoSierra is working with CH2M HILL to incorporate the data into the RD. Mr. Offner will provide the BCT initial data from the bench scale study prior to the distribution of the RD.

SIGNED 3/18/04

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BRAC Environmental Coordinator
BRAC Cleanup Team Member

DATE

SIGNED 3/18/04

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