

110-00210

06 November 1995

MEMORANDUM

NOV 13 1995

From: David Porter, SOUTHDIV

To: Lawson Anderson, EnSafe
Tonya Barker/Rob Williamson, NSA Memphis
Jack Carmichael, USGS
Jordan English/Jim Morrison, TDEC (Memphis)
Sue Hosmer, NSA Memphis
Keith Johns/Diane Cutler, EnSafe (Raleigh)
LCDR Terry Jones/LT Chuck Starkey, NSA Memphis
Mark Taylor, SOUTHDIV
Clint Willer, TDEC (Nashville)
David Williams, EPA Region IV

Subj: NSA MEMPHIS BRAC CLEANUP TEAM (BCT) MEETING, 23-24 OCT 95

Encl: (1) Minutes from 23-24 October BCT Meeting

1. Enclosure (1) is forwarded for your review and information. The list below summarizes follow-up assignments from the BCT meeting:

EnSafe (Lawson Anderson):

- Conduct TV inspection of storm sewer line serving former Hangar N-6 and the surrounding area (field work scheduled for week of 30 October).
- Incorporate finding-to-date for all Assembly A SWMUs in the Assembly A RFI report (submit report in sections - by SWMUs).
- Complete Assembly B RFI Report (deliver to regulators by 6 November).
- Complete Assembly C RFI Report (deliver to regulators by 30 October).
- Coordinate with activity on the removal of the soil pile at SWMU 1 (arrange for excavation and loading - NSA Memphis will arrange for transportation and disposal). While backhoe is on site for SWMU 1, use the equipment to excavate at SWMU 40 to confirm the presence of tanks.
- Develop "voluntary corrective action" plan for SWMU 60, based on additional sampling recently conducted.
- Develop sampling plan for SWMUs 66 (field work scheduled for January/February 1996).
- Conduct PCE sampling along south side fence line at the rear of the commercial dry cleaners while the DPT rig is on site 16 October - 10 November.
- While DPT rig is on site conducting sampling at rear of the commercial dry cleaners, conduct one push at S-242 for PCBs.
- Conduct Assembly E field work (include radiation survey at SWMU 2).
- Develop work plan for waste tank removal at SWMU 17 (include full scan analysis on soil)

EPA Region IV (David Williams):

- Provide review comments on RFI Reports for Assemblies A, B, and C as they become available.
- Provide review comments on sampling plan for SWMU 66 when it is completed.
- Provide NFA approval for SWMU 45.
- Reserve conference room at EPA Region IV for BCT meeting 29-30 November.
- Provide review comments on FOSL for Building N-13.

- Provide review comments on work plan for SWMU 17 when it is completed.

NSA Memphis - Environmental (Tonya Barker/Rob Williamson):

- Coordinate the disposal of IDW from Assembly A investigation.
- Coordinate with TDEC on radiation survey.
- Complete Superfund Site Radiation Screening Protocol.
- Arrange for the cleanup of SWMU 67 and oversee the operations.
- Assuming no contamination is found during the sampling at SWMU 66, arrange for the cleanup by DynCorp, including the recycling of CFC from disposed refrigerators.
- Request meeting with TDEC Nashville RCRA personnel to discuss RCRA operations (such as transportation of hazardous waste) on the north side after the base becomes open to the public.
- Coordinate with EnSafe on the removal of the soil pile at SWMU 1 (EnSafe will handle excavation and loading - NSA Memphis will arrange for transportation and disposal).

SOUTHDIIV (David Porter):

- Develop FOSL for Building N-13.
- Provide letter to TDEC requesting removal of the activity from the state's NPL.

SOUTHDIIV (Mark Taylor):

- Develop HSWA Permit renewal application (coordinate with Mr. Odus Johnson at EPA Region IV).
- Check into the possibility of having Mike Maughon at SOUTHDIIV putting on a statistics course for the BCT.

TDEC (Jim Morrison):

- Provide review comments on the sampling plan for SWMUs 66 when it becomes available.
- Provide review comments on the Tank Removal Plan.
- Provide review comments on RFI Reports for Assemblies A, B, and C as they become available.
- Organize radiation survey by TDEC personnel, based on list of potential sites provided by Rob Williamson.
- Provide review comments on FOSL for Building N-13.
- Provide review comments on work plan for SWMU 17 when it is completed
- Provide letter of concurrence with EPA Region IV's NFA decision for SWMU 45.
- Investigate a 3-day course in Washington on Data Quality Objectives conducted by EPA Superfund.

TDEC (Clint Willer):

- Initiate removal of NSA Memphis from state's NPL.

USGS (Jack Carmichael):

- Coordinate High Frequency Seismic work with the Kansas Geological Survey.
- Investigate the possibility of having someone from USGS do a course/talk on the use of modeling. Also, investigate a back-up course for statistics in the event SOUTHDIIV is unable to provide the training.

2. Reminder: next BCT meeting will be held at EPA Region IV in Atlanta on Wednesday 29 November - Thursday 30 November.

3. Please call if you have comments and/or questions: (803) 743-0610, DSN 563, e-mail: dlporter@efdsouth.navy.mil.



NSA MEMPHIS BCT MEETING MINUTES
23-24 OCTOBER 1995

The NSA Memphis BRAC Cleanup Team convened at 11:30 am on Monday 23 October in the Commanding Officer's conference room in building S-1. The following people were in attendance:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NSA Memphis
CDR Elkins, NSA Memphis
Sue Hosmer, NSA Memphis
John Karlyk, SOUTHDIV
CAPT James Mallory, NSA Memphis
Jim Morrison, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Rob Williamson, NSA Memphis

Notes on attendance: David Williams is absent due to the impending birth of his first child. Clint Willer is arriving on Tuesday.

David Porter briefed CAPT Mallory on the agenda for the RAB meeting on Tuesday evening.

The meeting was adjourned for lunch at 12:00 noon, and reconvened at 1:30 pm in the Environmental Conference room in Building S-241. The following people were present:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NSA Memphis
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
Keith Johns, EnSafe (Raleigh)
John Karlyk, SOUTHDIV
Jim Morrison, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Rob Williamson, NSA Memphis
Randy Wilson, NSA Memphis

The team discussed follow-up agenda items and assignments from the previous BCT meeting in August:

EnSafe (Lawson Anderson):

- Conduct TV inspection of storm sewer line serving former Hangar N-6 and the surrounding area (field work scheduled for week of 9 October).

Per Lawson Anderson, contract for sewer video has been awarded to Insituform MidSouth. Work is scheduled to begin on Monday 30 October, and will probably take 3 to 4 days to complete. Placement of additional DPT work for SWMU 7 will be based on the findings of the video.

- Incorporate finding-to-date for all Assembly A SWMUs in the Assembly A RFI report (submit report in sections - by SWMUs).
Per Lawson Anderson, SWMU 3 should go to the regulators this week. SWMU 8 will follow next week. SWMUs 1 and 5 will follow after that. SWMU 7 and 60 are on hold pending further investigation results.
- Complete Assembly B RFI Report week of 02-06 October.
Per Lawson Anderson, the RFI Report for Assembly B will be provided to the regulators by 6 November.
- Complete Assembly C RFI Report week of 09-13 October.
Per Lawson Anderson, the RFI Report for Assembly C will be provided to the regulators by 30 October.
- Develop "voluntary corrective action" plans for SWMUs 1, 60 (after additional sampling is conducted), N-122, and N-7, and conduct voluntary correction actions on N-7 and N-122 the week of 09 October.
Per Lawson Anderson, removals have been completed at N-122 and N-7. EnSafe is coordinating with the activity for the removal of the soil pile at SWMU 1 (EnSafe will arrange for excavation and loading, and NSA Memphis will arrange for transportation and disposal). Additional sampling is underway at SWMU 60.
- Overlay revised color map (environmental condition of property) with the community's reuse plan.
Completed.
- Develop sampling plan for PCB area on the south side, based on old aerial photograph, for activity to collect samples during Assembly D field work 5/6 October.
Sampling has been completed, as described in Robert Smith's memorandum of 10 October. Total of 15 samples were collected and screened using an immunoassay system. All samples were below the 1 ppm detection limit.
- Review Work Plan for SWMUs 66/67 and develop POA for sampling.
EnSafe is developing a sampling plan for SWMU 66, and will forward to EPA and TDEC when completed. They will start the field work in Level B. Field work for SWMU 66 is tentatively scheduled for January/February 1996 (after vegetation dies). Sampling plan will not be developed for SWMU 67 unless something of concern is noted during the cleanup of the site.
- Conduct PCE sampling along south side fence line at the rear of the commercial dry cleaners while the DPT rig is on site 16 October - 10 November.
To be completed.
- Conduct Additional sampling at SWMUs 5, 40, and 60.
Per Lawson Anderson, surface soil sampling has been completed at SWMUs 5, 40, and 60. Geoprobe sampling at the "hot spot" in the northwest corner of SWMU 60 is underway.
- Conduct Assembly D field work.
Per Lawson Anderson, field work is complete for Assembly D sites (Geoprobe is sampling SWMU 36, North Side Incinerator, today). There were no PCB "hits" detected with the immunoassay test kits used on the SWMU 11 samples (Oiled Dirt Roads/Riding Trails).
- Conduct Assembly E field work.
As noted in the 18 October memorandum from Lawson Anderson to the BCT, all surface soil, sediment, and surface water samples have been collected, with the exception of surface soil samples at SWMU 2. Geoprobe sampling will begin after SWMU 60 is completed. DPT sampling will begin on Monday, 30 October.

- **Conduct Follow-up Gray Areas field work.**
Per Lawson Anderson, sampling has been completed.

EPA Region IV (David Williams) - discussed during a conference call with David Williams at 2:00 pm:

- **Provide review comments on RFI Reports for Assemblies A, B, and C as they become available.**
To be completed as the documents are forwarded.
- **Provide approval for the Work Plans for Assembly A (additional investigation), Assembly D, Assembly E, and the Follow-up Gray Areas.**
Approval letters have been forwarded to David Porter.
- **Provide EPA's checklist to determine the need for a radiation survey.**
David Williams faxed a copy of Superfund Site Radiation Screening Protocol to NSA Memphis, and the BCT discussed the checklist. It was decided that some of the questions required research, and Rob Williamson will investigate and complete the survey.

Other items discussed with David Williams during the conference call:

- **HSWA Permit update strategy (Part B permit renewal to be submitted in March 1996 - what is needed for HSWA Permit).**
David Williams provided the EPA Region IV POC for HSWA renewals: Mr. Odus Johnson, (404) 347-3555, ext 6338. David Williams noted that there is probably a 45 day comment period, and that we could probably get rid of the NFA SWMUs, while adding the new SWMUs to the list in the permit. Mark Taylor will be developing the renewal application, and will contact Mr. Johnson for additional information.
- **SWMU 45 NFA Approval.**
David Williams stated that he hoped to have a response completed by the end of the week.
- **Summary of field work (including S-236 PCB sampling results), document submissions, and document review schedules.**
Lawson Anderson provided an update on the field work underway and just completed (as discussed in section above). In video taping the storm drainage line, he noted that the video company will mark the ground where breaks are seen. The tape will contain real time comments. Jordan English asked what would be noted on the tapes, and Lawson Anderson stated that the video company will identify breaks, cracks, and bad joints. Jordan English suggested that samples be taken at a percentage of the joints, regardless of their condition (should especially include those near the old hangar. Lawson noted that they planned to go down to the fluvial deposits for sampling with DPT. While discussing the results of the PCB screening at S-242, David Williams stated that he would like to see DPT pushes at the site to ensure there is not a subsurface plume of PCBs. The BCT decided that one push would be sufficient, and could be done when the DPT rig is one site along the property line at the rear of the commercial dry cleaners. In regards to the dry cleaners, Jordan English stated that if something is found during the DPT work to confirm the PCE problem is coming from the facility, then the facility will be handled under the state's new Dry Cleaner program. He noted that the program will not be underway for several months. Jack Carmichael stated that it is possible that the PCE found at background well No. 5 could have been an additive to an agricultural chemical products.
- **BCT Meeting Schedule for November/December**
It was proposed that the next BCT meeting be held in Atlanta the week after Thanksgiving. Jordan English and Jim Morrison stated that there may be an issue with out-of-state travel,

and deferred a decision until Clint Willer arrives. David Williams will reserve a conference room at EPA Region IV.

- **SWMU 17 (Waste Tank)**

David Williams stated that a letter and brief work plan would be sufficient (i.e., handle it just like SWMU 19). Lawson Anderson will provide this in the next couple of weeks. David Williams requested a full scan analysis on soil.

NSA Memphis - Environmental (Tonya Barker/Rob Williamson):

- Coordinate the disposal of IDW from Assembly A investigation - confer with new CO, CAPT Mallory, regarding the use of Federal Prisoner labor/use of SWMU 60 as a disposal site.

Per Rob Williamson, the activity is looking more at Murphy to do the work, as the prison labor work force has dwindled. SWMU 60 is probably OK with CAPT Mallory - Rob Williamson will confirm. Murphy can be accessed through EnSafe. EnSafe will take money out of the CTO, and will not expect reimbursement from the activity. EnSafe will proceed as soon as they get the go ahead from Rob Williamson. *Note: Subsequent discussions between Tonya Barker and LCDR Elkins resulted in changes to the above decisions. LCDR Elkins decided to request their Base Operating Services (BOS) contract, DynCorps, to conduct the work. The material will be spread at SWMU 41 on the south side.*

- Confirm possible locations of past uses of radioactive paints with Mr. Fumich, and coordinate with TDEC on radiation survey.

Rob Williamson's investigation into locations of past uses of radioactive paint are recorded in a memorandum to the BCT dated 18 October 1995. Rob Williamson will coordinate with Jim Morrison to schedule a TDEC radiation survey. TDEC will not survey the landfills (will cover building only). Lawson Anderson noted that EnSafe can conduct radiation survey of the landfills as part of the SWMU investigations.

- Collect samples from PCB area on the south side (coordinate with EnSafe during Assembly D investigation 5/6 October).

Conducted by EnSafe.

- Arrange for the cleanup of SWMU 67 through MWR or DynCorp using the Work Plan developed by Morrison Knudson, and oversee the operations.

The activity is pursuing the use of DynCorps or a non-environmental company to conduct the cleanup. Estimated cost is \$ 2000. NSA Memphis Environmental Department will oversee the work, and will stop the work if any potential environmental problem is encountered. The Environmental Department will develop a safety plan with the activity's safety office. Field work is to be conducted in the winter when the vegetation has died.

- Assuming no contamination is found during the sampling at SWMU 66, arrange for the cleanup by DynCorp, including the recycling of CFC from disposed refrigerators.

To be coordinated after EnSafe's investigation of the area.

- Request meeting with TDEC Nashville RCRA personnel to discuss RCRA operations (such as transportation of hazardous waste) on the north side after the base becomes open to the public.

Activity sent a letter to TDEC dated 11 October 1995, but a meeting has not been scheduled.

SOUTHDIV (David Porter):

- Develop RAB agenda and presentations, including general status report and fiscal year 1996 budget/execution plan. Completed.

SOUTHDIV (Mark Taylor):

- Investigate and coordinate possible use of either Corps of Engineers or 8(a) contractor for "voluntary corrective action" removals at such sites as SWMUs 3, 7, and two gray areas.

Per Mark Taylor, there is the possibility of using either the Corps of Engineers or the 8(a) contractor to conduct the work.

- Provide David Williams with a copy of EPA's February 1990 letter addressing NFA SWMUs. Completed.

The meeting was adjourned for the day at 4:00 pm, and reconvened Tuesday morning at 8:00 am in the same location. The following people were present:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NSA Memphis
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
Jim Morrison, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Rob Williamson, NSA Memphis

LCDR Terry Jones, Base Transition Officer, provided the BCT with a update on reuse issues. He noted that the community has just completed their reuse plan. The reuse plan is based on the transfer of the airfield under an Economic Development Conveyance (EDC). FAA has stated that they will not approve the plan under such a conveyance, and want a Public Benefit Conveyance (PBC). The lease for the airfield is still being negotiated between the Navy and the community. The airfield is being operated by the community under a 90-day license from CAPT Mallory. LCDR Jones noted that the community has recently expressed a desire for building N-13 (not included in the FOSL for the airfield).

The team continued their discussed on follow-up agenda items and assignments from the previous BCT meeting in August:

TDEC (Jim Morrison):

- Provide review comments on the Work Plan for SWMUs 66/67 and Tank Removal Plan. Jim Morrison provided comments on the Work Plan for SWMUs 66/67. He is still coordinating with the UST program on the Tank Removal Plan, and will provide comments by Wednesday, 1 November.
- Provide review comments on RFI Reports for Assemblies A, B, and C as they become available. To be completed as the documents are forwarded.
- Provide approval for the Work Plans for Assembly A (additional investigation), Assembly D, Assembly E, and the Follow-up Gray Areas. Completed. Regarding the approval of NFA for SWMU 45, TDEC will issue a letter of concurrence with EPA Region IV's decision.
- Organize radiation survey by TDEC personnel, based on list of potential sites provided by Rob Williamson. Jim Morrison will coordinate the survey, based on the information provided in Rob Williamson's memorandum of 18 October 1995.

TDEC (Clint Willer) - note: Clint Willer joined the meeting mid-morning:

- Investigate the possible use of Tennessee's emergency response contract on federal property.

Based on discussions with state counsel and other experience at federal facilities, Clint Willer noted that there is not a problem using the state's emergency response contractor on NSA Memphis.

- Coordinate Corps of Engineer's presentation to the BCT on Tuesday, 24 October, 2:00 pm, on their tank removal capabilities.
Completed.

USGS (Jack Carmichael):

- Coordinate High Frequency Seismic work with the Kansas Geological Survey.
Jack Carmichael has not heard from the Kansas Geological Survey on their proposal. He was not impressed with the pilot they conduct at the Defense Depot in Memphis.
- Investigate training opportunities for the BCT with the National Ground Water Association.
Jack Carmichael provided the BCT with a collection of training opportunities from the National Ground Water Association. The BCT discussed various courses and alternatives. Jim Morrison will investigate a 3-day course in Washington on Data Quality Objectives conducted by EPA Superfund. Mark Taylor will check into the possibility of having Mike Maughon at SOUTHDIR putting on a statistics course. Jack Carmichael will check to see if someone from USGS could do a course /talk on the use of modeling. He will also investigate a back-up course for statistics.

Rob Williamson told the BCT that he recently was informed by the range operator that a large live round of ammo was discovered at SWMU 2 by two teenage boys. *Note: Subsequent investigation by Rob Williamson is discussed in memorandum for record dated 25 October 1995. It appears that it was an isolated incident and should not delay the investigation of SWMU 2.*

Regarding the status of the groundwater model, Jack Carmichael noted that the pumping test has been completed and is being approved in the internal USGS system. It will be forwarded to the Navy as soon as this is complete. The model is being calibrated using the pump test data, and they are waiting on data from the south side before finalizing the model.

Regarding the BCT meeting in Atlanta, Clint Willer noted that they would need a letter from the Navy to arrange for out-of-state travel. He also stated that 29/30 November would be preferable to 28/29 November. The BCT decided on 29/30. David Porter will generate a letter for Clint Willer, as well as call David Williams with the new dates to that he can change the conference room reservation.

The BCT discussed the activity's listing on the State NPL. Clint Willer noted that it is possible to be delisted because of the Part B permit. Clint Willer will initiate this, although he may need a letter from the Navy requesting the delisting. A public hearing is required.

The BCT discussed the agenda for the BCT meeting in November. The following items were presented: DPT results, 1st of laboratory results from SWMUs 40 and 60, discussion of work plans for SWMUs 17 and 66, discussion of RFI reports for Assemblies B & C. Tentative start time of 9:00 am on 29 November, through afternoon on the 30th.

The meeting was adjourned for lunch at 11:30 am, and reconvened at 2:00 pm. The following people were present:

Lawson Anderson, EnSafe (Memphis)
Tonya Barker, NSA Memphis
Jack Carmichael, USGS (Nashville)
Jordan English, TDEC (Memphis)
John Karlyk, SOUTHDIV
Jim Morrison, TDEC (Memphis)
David Porter, SOUTHDIV
Mark Taylor, SOUTHDIV
Rob Williamson, NSA Memphis
Randy Wilson, NSA Memphis

Mr. Ken Williams from the Army Corps of Engineers (Memphis District) gave a presentation to the BCT on their tank removal capabilities. Mr. Williams noted that they do not require plans and specifications, but they do need a knowledgeable environmental person at the job site to supervise the work. They can handle removal of dry wells and other removals. They are paid through a MIPR - there is no contract (therefore there are no contract modifications to deal with if changes and mods are made in the field). Regarding time frame, they are somewhat limited by their river work, but are more flexible now that they have more than one crew. They are willing to prepare a proposal for no fee (since they are local). They do not need a formal request to prepare the proposal. John Karlyk noted that an Economy Act determination must be prepared in order to use the Corps.

The meeting was adjourned at 3:30 pm.

Note: A Restoration Advisory Board meeting was held at 6:30 pm at Baker Community Center. Minutes will be forwarded separately.