

PROJECT REVIEW MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE

14 April 2015

10:30 – 11:30 ET /9:30 – 10:30 CT

LOCATION: U.S. EPA Region 4, Atlanta/Conference Call

ATTENDEES:

Army, Base Realignment and Closure Division (DAIM-ODB): Carolyn Jones

USACE: Tulsa - Tyler Jones; Mobile – Laura Roebuck

CALIBRE: BEC - Joan Hutton

TDEC Division of Remediation, DDMT Project Manager: Jamie Woods

U.S. Environmental Protection Agency, Region 4, DDMT Project Manager: Diedre Lloyd

HDR EOC: Tom Holmes

GENERAL

Ms. Hutton opened the call by announcing those present on the call.

MAIN INSTALLATION

Remedial Action – Mr. Holmes stated no remedial action (RA) was currently underway on the Main Installation (MI). The planned EBT activities were completed in November 2014. Plans for further RA will be determined through the SRI/FFS now in progress.

The *MI Year 4 EBT Annual Report, Rev0* is in review by EPA and TDEC with comments due May 15, 2015.

Supplemental Remedial Investigation/Focused Feasibility Study

Mr. Holmes stated that SRI Phase 1 well installation would start Monday, 27 April at the locations in the approved SRI work plan. The USACE-Mobile District real estate group is seeking access agreements for the two off-depot well locations and has made contact with the land owners. Well installation will start with the nine on-depot locations if access is not available for the off-depot locations. If access is not obtained before drilling is completed, the off-depot wells will be installed in a separate field shift. Mr. Holmes noted that the location for a second intermediate aquifer (IAQ) well is dependent on findings from the first IAQ well. In response to a question from Ms. Roebuck, Mr. Holmes provided the name of the Mobile personnel working on the agreements.

DUNN FIELD

Remedial Action – Mr. Holmes stated that the FSVE system was shut down in 2012 and rebound monitoring is performed through LTM. Rebound was observed at two wells in the southern portion of Dunn Field in 2014.

AS/SVE system operations resumed on 6 March. The air sparge wells were closed on 8 April in accordance with the operational changes recommended in the 2013 LTM report and the Year Four AS/SVE report.

LONG TERM MONITORING

LTM is continuing with 99 wells on the MI and 86 wells on Dunn Field/Off Depot Area. Mr. Holmes stated that the April 2015 sampling event was completed on 13 April. A semiannual sample

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event was performed at the MI and a biennial event was performed with all but one well sampled at Dunn Field. Samples have been received at the laboratory with no problems noted. Analytical results will be available in early May.

Mr. Holmes stated a sample was not collected at MW-33; the well, located west of Dunn Field, was not accessible due to fencing and debris placed around the well by a nearby resident. Past problems with access at that location were discussed by the group. Problems with access and past damage to MW-182, located in the same area, were also discussed. Well abandonment or other actions for these wells will be addressed in the summary report for the April LTM event.

EPA and TDEC have provided comments on the *Annual LTM Report - 2014, Rev0* Feb 2015. The comments were discussed by the group. Ms. Lloyd asked about the TDEC comments as she had not had a chance to open the file. Mr. Holmes summarized the comments which included potential use of LTM wells for EBT, an incorrect date reference, abandonment of MW-33 and MW-182, and analytical results shown on cross-sections.

Some of the EPA comments were briefly discussed. Mr. Holmes noted that comments 1 and 2 addressed recommended changes to sample frequency with EPA requesting that any increase in time between samples be delayed. He noted that the recommendations were consistent with the approved LTM plans for the site and that three wells recommended for change from semiannual to annual samples were not sampled in the just-completed MI LTM event. Responses to these comments will be provided and discussed as necessary.

In reply to a question from Ms. Lloyd, Mr. Holmes clarified that new monitoring wells are sampled after installation and then semi-annually for two years after which an ongoing sampling schedule is established. EBT wells are not sampled as part of the LTM sampling program.

Ms. Lloyd pointed out comment 4 regarding changes to the property boundary at Dunn Field. Mr. Holmes stated that portions of the property in FOST 4 were deeded to a developer and to the City of Memphis for realignment of Hayes Rd., which borders Dunn Field on the east. The previous boundary is shown on older maps and can be provided.

Ms. Hutton stated that Army intended to address comments 11 to 19 through a separate memorandum providing the requested information. Ms. Lloyd stated that she felt inclusion of the information in future LTM reports, including the historical boundary for Dunn Field, would be helpful. It was agreed that following review of the memorandum, the information to be included in reports would be discussed.

Mr. Holmes asked for clarification of comment 10 as to whether EPA was stating a need for “Further investigation/action ...” regarding the AS/SVE treatment schedule and system operation. Ms. Lloyd stated the comment reflected EPA’s opinion that further consideration was necessary prior to shutdown of the AS/SVE system and that clarification of the plumes at Dunn Field, including the off-site NE plume, was necessary. Ms. Lloyd stated there may be two disconnected plumes with one from off-site and additional investigation is needed. Mr. Holmes replied that direction is needed from Army legal counsel as to the next steps for the off-site plume; the direction will follow further review and discussion with EPA legal counsel.

Mr. Holmes asked for clarification on comment 16 as to the meaning of the last sentence. Ms. Lloyd is interested in knowing the depths to the MAQ across the site.

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Ms. Lloyd clarified that “upper” in comment 17 should be changed to “upward”. She is interested in seeing if there are any strong confining conditions in the MAQ.

Ms. Jones asked why the source of the off-site NE plume could not be identified. Mr. Woods discussed the past investigations conducted by TDEC and that data collected at suspected sites did not confirm the source of contamination. Investigation methods and available funding were also discussed. Ms. Hutton indicated that Army data pre-dating TDEC’s offsite investigations suggested that the Cintas/Production Specialties sites likely contributed to the offsite plume on Dunn Field.

Ms. Lloyd asked about the schedule for the planned sale of Dunn Field. Ms. Jones replied that a sale was on hold until Army Environmental Legal Division could provide support.

The group discussed an EPA comment from the SRI work plan regarding setting the LTM sampling schedule to correspond with high and low precipitation/water levels. Mr. Woods stated the current sample schedule was appropriate based on his experience. After discussion, Ms. Lloyd stated that a simple comparison of water level measurements at selected wells and published rainfall data over time should be sufficient to determine whether the current semiannual sample schedule (April and October) corresponds to seasonal high and low groundwater levels. Ms. Lloyd is concerned regarding contaminants in the smear zone. Mr. Woods stated that there is only a one foot seasonal fluctuation, except for the Memphis Sand, where there is a seven foot seasonal fluctuation.

OTHER ISSUES

The scope of investigation required to address potential for vapor intrusion (VI) at the MI was discussed. Previously discussed VI models (Johnson-Ettinger and vapor intrusion screening level [VISL] calculator) were both acceptable to EPA and TDEC, but the Johnson-Ettinger model was considered more appropriate based on site conditions. Mr. Woods stated that he was not very concerned about potential VI from groundwater plumes based on the previous study near Dunn Field; however, potential VI into structures from numerous source areas at the MI was a concern and vapor sampling followed by confirmatory sampling was recommended at areas with higher contaminant concentrations. Mr. Holmes suggested that the report documenting the source areas investigation on the MI be reviewed to select sample locations. It was agreed that modeling followed by discussion of results and potential sample locations would be appropriate. Ms. Lloyd offered Mr. Ben Bentkowski’s participation in the post-modeling discussion. Mr. Bentkowski is the EPA regional VI lead and is participating in the development of the new VI guidelines for EPA. Army currently has no funding programmed for the VI work. The VI survey needs to be completed in 2016 for incorporation in the next five year review.

Mr. Holmes raised another EPA comment on the SRI work plan regarding the improved data from shorter well screens to potential VI concerns; Ms. Lloyd stated that the comment was a general statement that shorter well screens would provide more reliable data and thus aid review of potential VI from groundwater plumes.

Ms. Hutton stated the next Memphis Depot status conference call is scheduled for May 12 at 10:30 a.m. ET/9:30 a.m. CT.