

PROJECT REVIEW MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE

**18 August 2015
10:30-11:45 AM ET**

LOCATION: Conference Call

ATTENDEES:

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

USACE: Mobile – Laura Roebuck; Tulsa - Tyler Jones

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

No items

DUNN FIELD OFF-SITE PLUME

Ms. Hutton discussed her review of previous TDEC investigations into the source of the off-site plume migrating on to the northeast corner of Dunn Field. The discussion is intended to be a start in developing a path forward for addressing site impacts from the off-site plume. Ms. Hutton sent the *Information Paper - Analysis of Tennessee Department of Environment and Conservation (TDEC) Environmental Reports to Evaluate the Source of Chlorinated Solvents in Dunn Field Upgradient Wells* to the project team on 23 July 2015 and made specific reference to tables and figures in the document.

In general, Ms. Hutton's review indicated that the Cintas site was a likely source for 1,1-DCE and possibly TCE migrating on to Dunn Field, and that further investigation was warranted. PCE in the off-site plume is probably due to a separate source located east of the northeast corner of Dunn Field. The contents of the document are not repeated in this summary; questions and comments are summarized below.

Ms. Lloyd asked if wells MW-128, MW-129 and MW-130 were installed by Army and if well diagrams were available. Ms. Hutton stated that the wells were installed by Defense Logistics Agency prior to the transfer of responsibility for environmental restoration at DDMT to Army in 2010, and that well diagrams would be provided. Ms. Hutton also stated that all the wells being discussed were installed in the fluvial aquifer.

Following Ms. Hutton's review, Mr. Woods stated that there was good support for a release of 1,1-DCE at Cintas, but not for PCE and TCE. Mr. Woods noted that contaminant releases to the shallow groundwater were not drivers in the HRS scoring system for a site but that a release within two miles of a window, regardless of groundwater flow direction, was significant. He noted that the window in the northwest section of the MI should be within two miles of Cintas. Mr. Woods stated he would review the HRS scoring for Cintas to confirm that the distance to the window and other factors were properly scored.

PROJECT REVIEW MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE

**18 August 2015
10:30-11:45 AM ET**

Mr. Woods also noted potential problems with the soil gas survey conducted in the 2009 ESI for Cintas. Due to the amount of rain while the soil gas samplers were in place, the samplers were saturated when retrieved and the validity of the data was questionable. Mr. Woods stated that TDEC used a different type of sampler now.

Ms. Lloyd stated that the findings were interesting and worth pursuing but that the Army would retain liability for cleanup of groundwater contamination on Dunn Field. While she understood Army's concern in addressing contamination from a suspected off-site source, actions needed to be sensitive CERCLA policy requirements ("cross I's and dot t's"). Ms. Hutton stated Army should not be held to a higher standard than private or non-governmental properties in the Memphis area with the same issues.

Mr. Woods stated that contamination of the shallow aquifer with concentrations similar to the off-site plume was present throughout Memphis and that there was no funding to remediate the contamination. TDEC has commonly approved land use controls as a remedy with requirements for vapor intrusion studies with mitigation if necessary.

In response to a comment from Ms. Lloyd, Ms. Jones confirmed that sale of the property was Army's goal but it was not clear how that could be accomplished with the impact from the off-site plume and questioned whether there were potential purchasers for the property. Mr. Woods stated that transactions were occurring at other contaminated in Memphis and that TDEC had programs to address liability issues. Ms. Lloyd provided a link to EPA policy for liability protections in purchases of federal property but was not sure it would be applicable.

The project team agreed that discussion of the issue should continue.

Mr. Holmes provided a brief summary of the remaining agenda items.

MAIN INSTALLATION

Remedial Action - No current remedial action

Supplemental Remedial Investigation/Focused Feasibility Study

SRI Phase 1 well installation was completed 27 July and groundwater sampling was completed 31 July. HDR is waiting on receipt of laboratory results and continuing to work on the Phase 1 summary report. In response to a comment from Mr. Woods, Mr. Holmes confirmed that the Phase 1 wells had been planned to improve plume delineation, including off-site impacts on the MI. Additional wells will be recommended in Phase 2 if further delineation is needed.

Mr. Holmes stated the work plan schedule listed the SRI Phase 1 Summary report submittal on 28 August but that field work had extended 11 weeks past the planned completion, primarily due to delays in receiving access for off-site wells. An updated schedule for report submittal will be provided prior to the next monthly call.

DUNN FIELD

Remedial Action - FSVE system shut down in 2012. AS/SVE system operating.

PROJECT REVIEW MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE

**18 August 2015
10:30-11:45 AM ET**

Mr. Holmes noted that the Year 5, 2nd Quarter AS/SVE report was submitted on 30 July and the 60-day comment period will end on 29 September.

The AS/SVE system is off for the month of August. The AS manifold was closed on 6 August except for brief periods during system inspections; one SVE blower is operating 12 hours per day to maintain vacuum in the vadose zone.

Mr. Holmes stated that Army is considering enhanced remedial action in the AS/SVE area to address continued high CVOC concentrations at MW-159; all other wells have met the active remediation goal. The shutdown of the AS/SVE system from February 2014 to March 2015 had not resulted in significant contaminant migration from MW-159 and it is unlikely operating the system in alternate months will have much effect. Additional AS wells in the area of MW-159 are the expected approach; the project team will receive additional information as plans are developed.

LONG TERM MONITORING

LTM continuing with 99 wells on the MI and 86 wells on Dunn Field/Off Depot Area.

Mr. Holmes noted that comments on the April 2015 LTM Report were due on 11 September. Mr. Woods stated that he had read the report and did not expect to have significant comments.

(From the July call summary: Improved plume delineation was one of the objectives of the SRI, and the FFS will include recommendations for areas requiring treatment. These recommendations will be a subject for discussion when the SRI/FFS report is submitted. As progress toward cleanup levels, which are MCLs on the MI, is made, the Army would like to know there is consensus with regulatory agencies that the plumes are sufficiently delineated and that barring new information further investigation would not be necessary. The SRI will include a second phase of investigation and would be a good time to address current concerns.)

OTHER ISSUES

Mr. Holmes noted the Annual LUC Inspection reports were submitted by email on 6 August by Trinity ADC; HDR performed the inspections as a subcontractor to Trinity. There were no issues identified in the inspection, which was consistent with past inspections.

Ms. Lloyd asked if the LUC report was submitted to Carol Monnell at EPA, and Mr. Holmes confirmed she was on the distribution, as was Ms. Lloyd. He asked that Ms. Lloyd confirm the report was received; if not, the original email can be forwarded.

Mr. Holmes noted that dates for submittal of comments on semiannual LTM reports and quarterly RA reports have generally not been included on the transmittal memos. Regulatory review is not required, but the comments are appreciated in order to maintain consensus on site restoration plans and activities. The dates will be added on future transmittals. Mr. Woods and Ms. Lloyd agreed with the change.

Ms. Hutton stated that the next project review call would be on 15 September.