

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE

**12 April 2016
10:30-11:30 AM EDT**

LOCATION: Conference Call

ATTENDEES:

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

USACE: 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 referenced the documents submitted to the team by email shortly before the meeting: EPA guidance on groundwater remedy completion, two figures with tetrachloroethene (PCE) and trichloroethene (TCE) concentrations in groundwater on the Main Installation, and a table listing data gaps to be addressed with additional monitoring wells. The documents were for discussion regarding the Supplemental Remedial Investigation (SRI).

MAIN INSTALLATION

Remedial Action - No current remedial action

Supplemental Remedial Investigation (SRI)/Focused Feasibility Study (FFS)

Mr. Holmes noted EPA and TDEC comments on SRI Phase 1 Summary Report were due April 25 and asked if there were any preliminary comments. Mr. Woods stated his review had progressed to the conclusions and recommendations section. He had no comments to discuss but asked about the 2000 groundwater modeling and use of results at MW-21 and MW-39 to estimate attenuation rates. Mr. Holmes stated the SRI report noted additional contaminant sources between MW-21 and MW-39 that limit their usefulness in estimating attenuation rates. He noted the understanding of site hydrogeology and plume delineation in the 2000 MI Remedial Investigation (RI) and Feasibility Study (FS) was limited. The MI RI stated groundwater conditions in the Fluvial Aquifer (aerobic and low organic carbon) were not supportive of biological degradation, although physical contributors to attenuation would still be present. Attenuation estimates and modeling in 2009 for the MI IRACR are considered more usable but trends at wells outside enhanced bioremediation treatment (EBT) areas indicate attenuation is limited.

Mr. Woods asked if the 100 micrograms per liter ($\mu\text{g/L}$) used to select treatment areas in the MI Record of Decision would be used in planning future remedial action. Mr. Holmes noted the 100 $\mu\text{g/L}$ criterion was developed and approved in the MI Remedial Design based on the estimates of natural attenuation in the MI RI/FS. Based on the trend plots, CVOC concentrations below 100 $\mu\text{g/L}$ will remain above MCLs for a long time. A lower concentration criterion for remedial action is probably needed and is to be addressed in the FFS.

Ms. Lloyd joined the call a few minutes late. She stated her review of the SRI report was proceeding and had no comments at present.

Mr. Holmes stated preparation of the SRI Phase 2 Work Plan had begun. The documents provided to the team by Ms. Hutton prior to the meeting were intended to facilitate an initial discussion of Phase 2 activities as EPA and TDEC completed their review of the SRI report. Mr. Holmes stated that although the EPA guidance, *Groundwater Remedy Completion Strategy* (2014), was not referenced in the statement of work or the Phase 1 work plan, it provided a good template for the review and update of the selected remedy for the MI. The work conducted to date was consistent with the guidance, and the Phase 2 work plan and final SRI report would incorporate the guidance more directly. One aspect of the process was participation of the project team, including regulatory agencies, in determining the questions to be answered, the additional work required to answer the questions, and the changes to the selected remedy if needed. Ms. Hutton stated that Army's goal was to move purposefully and methodically in completing the investigation and conducting the focused feasibility study.

Mr. Holmes stated the data gaps and proposed well locations had been reviewed with Ms. Hutton and asked Mr. Woods and Ms. Lloyd to review and add to them where necessary. The table lists twelve data gaps and the two figures have 30 proposed well locations, consisting of two Intermediate Aquifer (IAQ) wells (I-1 and I-2) and 28 Fluvial Aquifer (FAQ) wells (F-1 to F-27, including F-21A). The SRI Phase 2 funding allows 1 IAQ well and 8 FAQ wells.

Mr. Holmes briefly discussed each of the data gaps, the proposed well locations and the initial selection of priority wells to be installed in Phase 2. He noted that the PCE and TCE concentrations indicated on the two figures were generally the highest concentration detected at each well since installation. Historical results were reviewed for each well including the two highest concentrations, the number of sample dates and the number of detects. If the highest concentration reported was identified as an outlier, the second highest concentration was shown on the figure. The high concentration data was shown to indicate potential source areas, since enhanced bioremediation treatment (EBT) has significantly decreased in current PCE and TCE concentrations in the treatment areas. (Figures with the proposed Phase 2 wells highlighted will be provided with the meeting summary.)

Mr. Holmes stated that updated site hydrogeology from the SRI report was considered in prioritizing Phase 2 well locations. Water level measurements in SRI and existing wells suggest a groundwater sink in the Fluvial Aquifer is present in the south-central MI and that groundwater flow in that aquifer is onto the MI from all sides. As a result, Fluvial Aquifer groundwater on the MI must flow into the IAQ and the Memphis Aquifer through the window in the northwest MI and the sink in the south-central MI. While groundwater contamination needs to be delineated throughout the MI and off-site where contaminants are migrating on to the MI, delineating suspected contaminant transport to deeper aquifers is considered a higher priority.

Mr. Woods stated the rationale for the data gaps and proposed well locations was reasonable, and that he would review it further. Ms. Lloyd agreed the proposed locations seemed reasonable and that further review was needed.

DUNN FIELD

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

Mr. Holmes stated AS/SVE operations were continuing in down-time mode with the compressor manifold closed and one blower operating 12 hours per day. A problem with Blower #1 was observed when the blowers were alternated during the inspection last week; amperage was less than usual and there was a whining noise from the blower. System operations in down-time mode using Blower #2 will continue until the new contract is in place. Inspection and repair of Blower #1 will also be delayed until the contract is in place.

Mr. Holmes noted EPA and TDEC comments on AS/SVE Year 5 Report were due May 19 and asked if there were any preliminary comments. Neither Mr. Woods nor Ms. Lloyd had comments at present.

LONG TERM MONITORING

LTM continuing with 111 wells on the MI and 85 wells on Dunn Field/Off Depot Area.

Mr. Holmes stated the 2015 Annual LTM Report status was submitted for internal review and that comments were due before the end of April. The report is expected to be submitted to EPA and TDEC prior to the May monthly call.

Mr. Holmes stated the April 2016 sample event will begin next week (April 18) and continue for about 10 days. Since the 2015 LTM report is not available for review by EPA and TDEC, no reductions in sample frequency from 2015 LTM will be implemented. Groundwater samples will be collected from the 26 MWs and PMWs used for EBT. Those wells have not been sampled since November 2014 and, because they are generally located in the core of the plumes, the level of detail in the plume maps is decreased. The former EBT wells will be sampled semiannually in 2016 and a new sample frequency will be recommended in the next annual LTM report.

OTHER ISSUES**2016 SMP**

Mr. Holmes noted that responses to the EPA and TDEC comments on the 2016 Site Management Plan were submitted on April 1 and asked Mr. Woods and Ms. Lloyd if they had reviewed the responses. Mr. Woods said he was satisfied with the responses and would provide an approval letter. Ms. Lloyd said she had not reviewed the responses but would do so soon.

Calls to Community Information Line

Ms. Hutton stated that the only calls in March had been from Mr. Blakely, who had also contacted Mr. Woods and Ms. Lloyd. Mr. Woods stated that Mr. Blakely had contacted TDEC several times and asked that documents be delivered to him. Mr. Woods had tried to be helpful and provided a list of the documents. He informed Mr. Blakely he should narrow his search to appropriate documents and that he could view and copy materials at the TDEC office. He noted Mr. Blakely indicated other family members were considering filing claims. Ms. Jones suggested Mr. Woods use a consistent approach since all residents will expect the same level of support. She also noted that the Freedom of Information Act requirements outlined the appropriate support. Ms. Lloyd stated her information from Mr. Blakely was consistent with Mr. Woods.

Mr. Holmes stated that the only contact to date in April was from Ms. Anita Bunn, the on-site property manager for Colliers International. She contacted Ms. Cooper (HDR) regarding an air

quality complaint from a security guard working at one of the warehouses. The complaint was due to problems with mold, asbestos and lead-based paint. Surveys for asbestos and lead-based paint were conducted when the facility closed in 1997 and Ms. Cooper referred Ms. Bunn to the appropriate documents. The complaint is not related to the Army's ongoing environmental restoration activities.

Status of New Contract for 2016 Work

Ms. Hutton asked Ms. Roebuck to provide an update on the new contract for DDMT restoration activities and noted the need to have it in place in order to proceed with AS/SVE operations as well as other activities. Ms. Roebuck stated she had approved the latest cost proposal from the small business contractor, Trinity ADC, and had submitted it to the contracting officer (CO) for approval. A reply from the CO is expected within the week. Ms. Hutton will then request the funds transfer from Army and Ms. Roebuck will prepare the contract documents upon confirmation of receipt. The final contract documents will have to be reviewed by Mobile contracting, and possibly legal staff, which Ms. Roebuck estimates will take one to two weeks.

Next Call

Ms. Hutton stated the next call would be Tuesday, May 10 at 10:30 ET.

[Note: Date for the next call changed to Tuesday, May 17.]