

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

**8 August 2017  
10:30-11:50 AM EDT**

**LOCATION:** Conference Call

**ATTENDEES:**

Army, Base Realignment and Closure Division (DAIM-ODB) – Jay Foster

CALIBRE BEC – Joan Hutton

USACE: Mobile – Laura Roebuck

U.S. EPA, Region 4, DDMT Project Manager – Diedre Lloyd (absent)

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

HDR EOC – Tom Holmes

Trinity – Todd Calhoun

**GENERAL**

Ms. Hutton stated that the Environmental Protection Agency (EPA) issued *Superfund Task Force Recommendations* in July. Ms. Hutton stated the new EPA administrator pointed out there were over 1300 Superfund sites nationally and many of them were not moving quickly. He directed the task force be put together within EPA to come up with recommendations. Ms. Hutton will provide a link to the document to Mr. Woods.

Ms. Hutton stated that the site meeting is scheduled for Tuesday 29 August, 2017 at 8:00 a.m. CST. She sent an email to the project team on 7 August requesting agenda items to be discussed.

**MAIN INSTALLATION**

**Remedial Action** - No current remedial action

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

Mr. Holmes stated that HDR is working on the SRI Phases 1 and 2 Report and the goal is to submit the internal draft next week and provide it to EPA and TDEC in the middle of September. Mr. Holmes stated that the Phase 3 Work Plan is in preparation; the well locations will be based on recommendations in the Phase 2 work plan for wells to be installed during Phase 3.

Joan Hutton is working with the United States Army Corps of Engineers (USACE) Mobile on providing access to an offsite IAQ well near the NW corner of DDMT. Ms. Hutton stated that she spoke to Mr. Foster last week and they are going to review the agreement and possibly have a conversation with Environmental Legal Division (ELD) to see if they can break through the hold up.

**Risk Assessment Update/Review**

Mr. Holmes stated that HDR is updating the groundwater risk assessment that was done for the Main Installation (MI) Remedial Investigation (RI) in 2001; the soil and screening level ecological risk assessments from the MI RI are also being reviewed to determine if an update is appropriate. Ms. Hutton submitted a memo summarizing the risk assessment scope to EPA and TDEC on 6 July. Mr.

Holmes stated that HDR has proceeded with the work because it is in accordance with the Statement of Work and HDR's understanding of EPA guidance. Comments are requested from EPA and TDEC in order to address identified issues as early as possible. Mr. Woods confirmed that he will send it to TDEC Risk Assessment staff.

### **Groundwater Model**

Mr. Holmes stated HDR's request for Memphis Light, Gas and Water (MLGW) data to aid the groundwater modeling was denied in a 17 July email from Monica Darby of MLGW. HDR has received updated groundwater extraction data for the Allen Well Field from Mr. Woods. The data received was for the well field and not individual wells. The SRI Phase 1 report noted that the average flow from Allen Well Field was close to the combined flow from wells that are rated 1 and 2. If more information is not received, HDR will estimate pumping from the Allen Well Field is equal to the stated gallons per minute flow from individual wells rated 1 and 2. HDR has identified one well from a United States Geological Survey (USGS) database, a water level monitoring well located south of Allen Well Field. That information will provide limited support to calibrate the draw down from the model.

Mr. Woods stated TDEC has obtained MLGW data for use at a new Superfund site in Memphis and will call Ms. Darby and see if there is a way to obtain at least some of the requested data. Ms. Hutton stated that Ms. Lloyd agreed to prepare a letter requesting MLGW's assistance; Mr. Woods agreed to coordinate with Ms. Lloyd.

### **Vapor Intrusion Survey**

Mr. Holmes stated internal review of the VI Screening Level Technical Memorandum has been completed and that Army will be provided the memorandum this week for submittal to EPA and TDEC. EPA's VISL calculator and the Johnson and Ettinger (J&E) model were used to estimate human health risk from volatile organic compounds (VOCs) in groundwater on the MI. Mr. Holmes stated that VOCs exceeded EPA screening levels and HDR is preparing a work plan for soil gas samples.

Mr. Holmes stated he had heard that the J&E model isn't used much anymore. Mr. Woods thought that was correct and that he would ask for information on TDEC's current guidance on VI modeling.

### **Mayfield Development**

Mr. Woods stated that TDEC received a call from a Memphis resident located near Dunn Avenue between Hayes and Castalia; the resident was asking what was going on at the Depot in that area. Mr. Woods asked if Mayfield, the owner, was starting to tear down warehouses for new construction. Ms. Hutton stated that the last conversation with Mayfield partners had been in mid-July. At that time, CERCLA requirements were discussed and Mayfield was to have their environmental attorney prepare a list of questions. Ms. Hutton stated that there was no indication that Mayfield was prepared to begin redevelopment yet. Ms. Hutton will send an email to Anita Dunn (Memphis Depot Property Manager) to see if any activities are taking place and follow up with Mr. Woods.

Mr. Foster mentioned a concern with the Vapor Intrusion (VI) aspects of the property and the benefit of making sure that Mayfield considers using vapor barriers in their new construction. Mr. Foster stated that Army can't dictate requirements, but suggested that reinforcement from TDEC would be beneficial. Mr. Foster and Ms. Hutton will try to follow up with Mayfield when they are onsite on 29 August.

Ms. Hutton stated she has made an analysis of the monitoring wells within Mayfield's redevelopment footprint and will provide recommendations for each one. Ms. Hutton will send the spreadsheet to the internal team for discussion and then to Ms. Lloyd and Mr. Woods. Ms. Hutton suggested that the team discuss it before or during the site meeting and then provide the recommendations to Mayfield. Ms. Hutton will follow up with Mayfield regarding their plans and the questions from their attorney.

Ms. Hutton stated that she had looked online for a deed for the property Mayfield purchased from the Depot Redevelopment Corporation (DRC). There are instruments (separate legal documents) recorded that convey all of the environmental aspects and requirements. Ms. Hutton will make sure that Mayfield is made aware of it.

Mr. Woods stated that the only issue left is the VI on the MI. There isn't direct contact for soil except during construction and no one uses the shallow groundwater. It is Mr. Woods understanding that the VI pathway is going to be included in EPA's hazard ranking system (HRS), which will impact environmental requirements at some sites.

Ms. Hutton confirmed that she sent the presentation on vapor intrusion provided by Mr. Woods to Mayfield.

## **DUNN FIELD**

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

### **Status of AS/SVE Operations**

Mr. Holmes stated that the air sparge (AS) manifold was open and the system is working with blowers #1 and #2 alternating for 24 hours/day operation. A local electrical contractor and their computer support person was on-site recently to look at the system logic controls and computer interface. The problem with Blower #1 easily corrected. The logic controls and computer program were downloaded for the contractor to review for the changes needed to incorporate the new air sparge wells that Trinity will be installing. HDR conducted PID readings last week and collected another sample to check results from the previous sample; the primary CVOCs were similar to previous results but other VOCs were reported at higher concentrations. The AS manifold will remain open until mid-to-late August; the blowers will then alternate for 12 hours/day operation.

### **AS Well Installation Update**

Mr. Calhoun stated that Trinity is still waiting on MLGW to provide a right-of-entry to the property in order to install the additional wells.

Ms. Hutton stated another request was sent to Ms. Griffin at MLGW in July but there has been no response. She and Mr. Foster recently discussed possible actions and he suggested a letter to the MLGW Board of Commissioners since it is a public entity. Ms. Hutton stated that they will look at the current draft agreement and the original agreement that MLGW. The same issue applies to the Belz property access for the planned, off-site SRI well. Ms. Hutton and Mr. Foster will review those and possibly speak to ELD about it.

Mr. Foster concurred with Ms. Hutton's statement and mentioned that there is another way to approach it. They will consider what language is perceived differently, such that they do not want to process an agreement that was in place beforehand. Mr. Foster and Ms. Hutton will provide the team with a path forward after the research has been completed.

**MIP Survey Update**

Mr. Calhoun stated that the CD with lab reports should have been received by EPA and TDEC on 28 July. The transmittal letter requested comments be received by 26 September. (Following the discussion, Mr. Calhoun stated he had to travel to another meeting; he apologized and left the call.)

**Dunn Field long-term outlook**

Ms. Hutton stated that Mr. Woods provided 19 files from the TDEC's UST group; however, only one site dealt with groundwater. The file did not include groundwater elevation data, and thus the depths to water are not usable. Mr. Woods stated that there is one more site in the area and he hopes to provide the file in the next few days.

Ms. Hutton will look at developing a plan based on her previous review of TDEC studies in 2005 to 2008. Mr. Holmes stated that there were wells installed by TDEC northeast of Dunn Field, and Mr. Woods stated the wells are still available. Ms. Hutton suggested measuring water levels during the site visit.

**LONG TERM MONITORING****LTM Status**

Mr. Holmes stated that Mr. Woods provided approval on the 2016 Annual LTM Report and Ms. Lloyd provided EPA's comments. Responses to the EPA comments were provided on 26 July. HDR is waiting on EPA to review and reply to the responses.

Mr. Holmes noted that Ms. Hutton had requested that EPA and TDEC review the LTM reports for issues with delineation of the plumes and asked Mr. Woods if he had any concerns and whether he thought additional wells were needed. Mr. Woods agreed to review the data for discussion during the site visit.

Mr. Holmes stated that the April 2017 LTM Summary was reviewed internally and that responses to the comments had been approved. HDR will revise the report for submittal by Army.

**OTHER ISSUES**

**Community Involvement Line (CIL)** - Ms. Hutton stated that no CIL calls had been received in July. A call was received in August from the granddaughter of a lady living two houses behind the AS/SVE system. She had asked HDR/Trinity field staff performing the recent sampling about the AS/SVE buildings; they suggested she call the CIL and provided the number. Denise Cooper (HDR) returned her call. The granddaughter wanted to ensure that there was no threat of contamination. Ms. Cooper informed her that the building housed equipment to clean up the groundwater and that contaminated groundwater could not seep up into her grandmother's yard. Ms. Cooper confirmed the grandmother was on the mailing list for the annual environmental newsletter and added the granddaughter to that list per request. Ms. Hutton stated no further action was required.

**Five-Year Review Status**

Mr. Holmes stated that the Five-Year Review is being reviewed by Army ELD with comments due in September. HDR plans on providing the report for Army to submit to EPA and TDEC in October.

**2017 UFP-QAPP**

Mr. Holmes stated that the 2017 UFP-QAPP was submitted in May and comments were due on 14 July. Mr. Holmes noted Ms. Lloyd stated that EPA intended to provide comments but he had not heard from Mr. Woods. Mr. Woods confirmed that he would review the document.

**Annual LUC Inspection**

Mr. Holmes stated that internal review of the Annual Site Inspection report for land use controls had been completed and the reports would be submitted to EPA and TDEC soon. (Note: Reports submitted 8 August.)

**Next Call**

The next call is scheduled for Tuesday, 12 September at 10:30 AM ET.