

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
13 December 2017
10:30-11:30 AM EDT

LOCATION: Conference Call

ATTENDEES:

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

CALIBRE BEC – Joan Hutton

USACE: Mobile – Laura Roebuck

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

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

HDR EOC – Tom Holmes

Trinity – Todd Calhoun

GENERAL

N/A

MAIN INSTALLATION

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

Phase 3 Wells

Mr. Holmes stated information on the off-site Phase 3 well locations was provided to Ms. Hutton and Ms. Roebuck today in order to proceed with access agreements.

Risk Assessment Update/Review

Mr. Holmes stated that the Risk Assessment Update/Review is being reviewed by the Army and is scheduled to be submitted to EPA and TDEC in January.

Groundwater Model

Mr. Holmes stated that the groundwater model is on hold while HDR tries to obtain data for the Allen Well Field from Memphis Light, Gas and Water (MLGW). Mr. Holmes stated that Mr. Woods has spoken with Jack Carmichael at the United States Geological Survey. Based on preliminary discussions with Mr. Woods and Ms. Hutton, HDR is considering recommending Mr. Carmichael be subcontracted to review the model set-up and results and to aid in obtaining MLGW data. Mr. Holmes plans on calling Mr. Carmichael in the next couple of days and will inform the team on the discussion.

Mr. Woods stated that Mr. Carmichael is working on a ‘user-friendly’ regional groundwater model for the Memphis area; the model will allow site-specific data to be added in order to generate site-specific models. The regional model will have the pumping rates and extraction points from MLGW as of 2015. Mr. Woods stated that the date the model will be available to the public is not known.

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Vapor Intrusion Study

Mr. Holmes stated that Vapor Intrusion (VI) soil gas sampling is pending EPA and TDEC comments on the Quality Assurance Project Plan (QAPP).

Mr. Holmes stated that Ms. Hutton sent out the responses to Ms. Lloyd's comments for the VI Screening Level (VISL) memo and he had sent responses to Mr. Woods' informal comments submitted on the VISL memo pdf. Mr. Holmes noted that the VISL memo was never intended to go to Revision 1; the responses will be incorporated into upcoming documents for the VI study.

DUNN FIELD

Status of AS/SVE Operations

Mr. Holmes stated that HDR closed the air sparge (AS) manifold last week after collecting the quarterly samples and there are currently no issues with the system. Mr. Calhoun stated that the lab data should be available around 28 December 2017.

AS Well Installation Update

Mr. Woods asked if progress has been made on the access agreement. Ms. Hutton responded that she generated a draft letter to the MLGW Commissioners that went through internal review; she will finalize it and send it to BRAC for review. Mr. Woods mentioned that TDEC was taking a harder line on obtaining access; he had been contacted by a new TDEC attorney regarding assistance with the access issue, but declined because he thought progress was being made.

Ms. Hutton stated that she met with Ms. Griffin of MLGW around 30 August 2017; she responded to Ms. Griffin's issues with the Right-of-Entry (ROE) agreement, but received no response to several emails seeking to move forward on the access issue. Mr. Woods requested Ms. Hutton's emails to Ms. Griffin in order to provide them to TDEC's attorney.

Ms. Lloyd stated she still planned to draft a letter to the commissioners on behalf of EPA to support the letter prepared by Ms. Hutton.

Ms. Hutton will provide Mr. Woods and Ms. Lloyd a copy of the draft letter when she sends it to BRAC for review. Ms. Hutton reiterated that the letter is a draft and needs to be reviewed by BRAC. The effort needs to be coordinated among all three agencies to determine the best path forward.

Mr. Calhoun asked Mr. Woods if MLGW has a real estate branch. Mr. Woods stated that he would look into it. Ms. Hutton stated she had reviewed MLGW's web site; it was focused on responses to utility customers with no contact information for other issues.

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Final MIP Survey Report

Mr. Calhoun stated that he will send the responses to EPA comments on the Final MIP Survey Report to Ms. Hutton today.

TDEC Well Data Memo/Additional Investigation

Ms. Hutton stated that a scope of work (SOW) for completing Army's investigation in the off-site area will be developed from the TDEC Well Data Memo. The purpose is to provide lines of evidence that the groundwater contamination from the off-site area is not the result of Army activities.

Mr. Holmes provided a review of the TDEC Well Data figures provided prior to the call. Figure 1 shows the TDEC well locations and labels the two primary areas of TDEC's off-site investigation, Cintas and Wabash Avenue. Seven wells are associated with the Cintas site and four wells at Wabash Avenue; the northern Wabash Avenue well (WB-04) was not usable, but the others were. Figure 2 shows groundwater elevations and contours from the water level sweep made on 3 and 4 October, prior to sampling the TDEC and LTM wells. The groundwater elevation contours show a fairly uniform flow direction to the southwest in the TDEC well area, but it changes to a more westerly direction, due to the groundwater elevation at MW-28, just east of Dunn Field.

The groundwater sample concentrations are shown for TCE on Figure 3 and for DCE on Figure 4. Usually, the lowest concentration isopleth is the maximum contaminant level (MCL) concentration [5 micrograms per liter ($\mu\text{g/L}$) for TCE and 7 $\mu\text{g/L}$ for DCE]; the TDEC well figures include an isopleth contour at the reporting limit (RL) which is 1 $\mu\text{g/L}$ for TCE and DCE. Ms. Hutton stated that the added contour interval has been useful to get a better idea on the full extent and it will assist in planning further investigation. Figure 4 shows a higher DCE concentration on the Cintas site. Mr. Holmes stated that he and Ms. Hutton have had a preliminary discussion on the additional scope and that Ms. Hutton is reviewing it in more detail.

Mr. Woods asked if there was additional historical data in this area. Ms. Hutton responded that a monitoring well MW-128, and prior to that a piezometer, were present in the cul-de-sac adjacent to the Cintas site, but were abandoned. Mr. Woods asked if ground water samples from MW-128 had comparable TCE concentrations to wells near the northeast corner of Dunn Field. Ms. Hutton stated that historical data from 2004 and 2005 for Army wells MW-128, MW-129, and MW-130 had the following range in CVOC concentration: 1,1-DCE from 22 $\mu\text{g/L}$ in MW-130 to 153 $\mu\text{g/L}$ in MW-128; TCE from 16 $\mu\text{g/L}$ in MW-128 to 50 $\mu\text{g/L}$ in MW-130. Ms. Hutton stated that the data is expected to show that the groundwater contamination was not be due to Army activity, but that conclusions will be based on the data. Ms. Hutton noted that identification of a definite source was not the primary goal of Army's investigation. Mr. Woods stated that attribution of the groundwater contamination to an area upgradient of Dunn Field should be sufficient.

Ms. Lloyd asked if the information was all based on historical TDEC data. Ms. Hutton responded that the Army collected samples from 11 TDEC wells that were installed in 2004 and 2005. Detailed review of the historical groundwater data was not in the scope of the initial TDEC well investigation,

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but the data will be reviewed and discussed in future work plans or reports. Ms. Lloyd said she would need to consider other data such as screened intervals for wells in reviewing the data. Mr. Holmes noted that the TDEC well memo submitted on 1 December includes more information about the TDEC wells (soil layers and screen depths).

LONG TERM MONITORING

2017 Annual LTM Report

Mr. Holmes stated that the 2017 Annual LTM Report is in preparation.

OTHER ISSUES

Five-Year Review

Mr. Holmes stated that the Five-Year Review, Revision 1 and responses to comments were submitted on 9 December via email.

Ms. Hutton asked Ms. Lloyd if additional CDs with the Five-Year Review needed to be sent to other individuals at EPA for review. Ms. Lloyd will check and provide that information to Ms. Hutton as soon as possible.

Community Information Line Update

Ms. Hutton stated that there had been one call in November, which was discussed on the November SMT call, and that no calls had been received so far in December.

Submittal Schedule

Ms. Hutton stated that she updated the regulatory submittal spreadsheet to be more concise and up to date as of 12 December. Ms. Hutton provided an overview of the submittal schedule and noted that EPA and TDEC don't need to provide comments on secondary documents.

Mr. Holmes stated that receiving comments on the QAPPs in a timely fashion is important. The Soil Gas Sampling QAPP comments are due later this month and the SRI Phase 3 QAPP comments are due in early January.

Ms. Hutton asked Mr. Holmes how responses to Ms. Lloyd's comments on the Risk Assessment Scope Memorandum would be addressed because they were noted as informal comments. Mr. Holmes stated that HDR will prepare draft responses to Ms. Lloyd's comments in the next few weeks.

Ms. Hutton stated that the submittal schedule will be updated monthly and sent out once a month to the team.

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ACTION ITEMS

The following action items were identified from the discussions during the call:

- Mr. Holmes will contact Jack Carmichael, USGS to discuss a collaborative arrangement for the groundwater modeling task.
- Ms. Hutton will send the email summarizing her meeting with Charlotte Knight-Griffin to Mr. Woods.
- Ms. Hutton will send the draft MLGW Board of Commissioners letter to Mr. Woods and Ms. Lloyd when it is sent to the BRAC office.
- Mr. Calhoun will provide RTCs to Ms. Hutton on the MIP Survey Report.
- Ms. Lloyd will provide Ms. Hutton a contact list of EPA staff who need CDs of the Five-Year Review, Revision 1.
- Mr. Holmes will provide RTCs to EPA's comments on the Risk Assessment Summary prior to the next monthly call.

Next Call

The next call is scheduled for 9 January 2018 at 10:30 EDT.