

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

11 June 2019

10:30 EDT

LOCATION: Conference Call

ATTENDEES:

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

CALIBRE BEC – Joan Hutton

USACE: Mobile – Laura Roebuck; Bill Woodall (absent); Melissa Shirley

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

MAIN INSTALLATION

Remedial Action - No current remedial action

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

SRI Phase 3 Report

Mr. Holmes began by addressing an EPA comment on the Phase 3 Summary report regarding difficulty in obtaining offsite access for installation of an Intermediate Aquifer (IAQ) monitoring well. Mr. Holmes stated that the project team has been trying since 2015 to get access for a well on commercial property northwest of the MI; the current focus is on a property owned by Belz Enterprises, a Memphis development firm. There are limited options for placement of a well in that area, and Ms. Hutton is the main contact for this access agreement.

Ms. Hutton stated that although other locations have been considered, the Belz property would be the best option. The Army is looking into paying a stipend for legal fees to cover Belz attorneys review of the access agreement. Belz had initially provided a draft access agreement to the Army, but it did not conform to USACE Mobile requirements. Since then, Belz has not been willing to entertain further discussion.

Ms. Lloyd stated that if a letter from the EPA would be helpful, she would be happy to start that. She added that the EPA letter to Memphis Light, Gas and Water (MLGW) was in routing for approval.

Mr. Holmes stated HDR is working on access agreements for offsite locations needed for SRI Phase 4 and the Dunn Field Offsite Investigation. EPA and TDEC will be kept informed on status of the agreements.

Mr. Holmes noted the Phase 3 Summary Report is an interim report and the information will be incorporated into the Phase 3 and 4 Report. An approval letter is not needed for Phase 3, but responses to comments on the report will be prepared and incorporated in the final report.

SRI Phase 4 Quality Assurance Project Plan (QAPP)

Mr. Holmes stated an EPA email was received regarding the Phase 4 Quality Assurance Project Plan (QAPP). The email incorporated previous emails noting the use of 20-foot screens in monitoring

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

11 June 2019

10:30 EDT

wells at DDMT and included a link for the Solinst multi-level system in wells. Mr. Holmes stated he was not clear on the comment since 10-foot screens have been used in all SRI wells based on EPA's comment and the two nested wells planned for Phase 4 will have 2.5-foot screens. Ms. Lloyd stated the email was intended to note the Solinst system was an alternative for the nested wells. Mr. Holmes stated a multi-level system was considered, but the nested wells allow a simpler approach for water-level measurements and sampling in the different zones. Screen depths for the nested wells will be selected based on hydraulic conductivity data from planned Vertical Profiling to be conducted in August.

Mr. Holmes stated that the Phase 4 QAPP was submitted in late April, and the review period extended to late June. HDR hopes to finalize the QAPP and begin fieldwork in late summer/early fall.

Risk Assessment Update/Review

Mr. Holmes stated that EPA had provided a letter of contingent approval for the Human Health and Ecological Risk Assessment (HHERA) based on additional work to be performed. HDR is moving forward on Rev 1 of the HHERA and additional data review in preparation of a new QAPP for further sampling and risk assessment. Mr. Holmes asked Mr. Woods about his recent discussion with TDEC risk assessors regarding the HHERA. Mr. Woods stated they are fine with deferring to EPA comments but he wanted to know if there was a 'drop-dead date' for submitting comments. Mr. Holmes stated additional comments could not be incorporated in the HHERA revision, as HDR has a set statement of work for revisions to the HHERA and preparation of the QAPP, based on the responses to EPA comments and the contingent approval letter. Comments would be reviewed and incorporated into the QAPP if possible. Mr. Holmes stated TDEC would have a chance to comment on the QAPP and on a new comprehensive HHERA report following implementation of the QAPP. Ms. Lloyd offered to assist in connecting TDEC and EPA risk assessors to discuss the EPA comments, if that would be of use.

Vapor Intrusion Study

Mr. Holmes stated that EPA is about to submit comments on the Soil Vapor Sampling memorandum from January 2019. The Indoor Air Sampling QAPP was submitted to EPA and TDEC in late April and is nearing the end of the comment period. Mr. Holmes stated that, as with the HHERA, HDR has a set scope for the vapor intrusion study. Additional vapor sampling was recommended in the Soil Vapor Sampling memorandum, and vapor intrusion will be incorporated in the QAPP being prepared under the Risk Assessment task. Comments on the VI memorandum or Indoor Air QAPP that required additional sampling could be incorporated into the risk assessment QAPP.

Mr. Woods asked about the remedy for the Main Installation. Mr. Holmes stated that remedial action objectives for groundwater haven't been changed by the HHERA. The maximum contaminant levels (MCLs) are still considered protective, but the potential vapor intrusion risk is a separate issue requiring further study. Overall, the purpose of the SRI was to look at the selected remedy, and there will probably be some changes to the remedy. Mr. Woods noted that the Soil Vapor Extraction (SVE) pilot test could lead to a remedy that would address vapor intrusion and groundwater impacts

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

11 June 2019

10:30 EDT

Additional SRI

Mr. Holmes stated that the SVE Pilot Test Work Plan was finalized 6 May. HDR is installing shallow vapor monitoring points (VMPs) in three areas: Building 720 which is at the entrance to the window where groundwater flows from the Fluvial Aquifer to the IAQ, and at two former enhanced bioremediation treatment areas, TTA-1 North, and TTA-2. The VMPs should be installed and sampled by the end of this week, and that data will be used to select the pilot test location. The VMP data for the Building 720 area will also be used to select a location for the vertical profile boring in that area.

The draft Vertical Profiling Work Plan is in review by the Army.

Regarding the Conceptual Site Model (CSM) update, Mr. Holmes stated that HDR is reviewing stratigraphy, groundwater flow, and concentrations of chlorinated volatile organic compounds (CVOCs) to improve the final SRI.

HDR is still working on the response to U.S. Geological Survey (USGS) comments on the CSM submitted for the planned groundwater model. There are no plans for additional deep wells or groundwater modeling since the necessary data from MLGW is not available. Ms. Lloyd asked if HDR would pursue modeling if MLGW granted access. Mr. Holmes said that would depend on the response. The access being sought is only for air sparge (AS) wells in the AS/SVE area. If a line of communication opens, then perhaps a request for data that would assist modeling would be considered.

Ms. Lloyd noted that EPA's letter is addressed to the president of MLGW.

Mr. Woods discussed the regional groundwater model being built by USGS and whether that could be used. Mr. Holmes replied that, given the scale of the model, he did not think there would be sufficient data, especially for the Allen Well Field; the HDR modeling effort is on hold.

FU4 Garden Sampling

Mr. Holmes stated that HDR is working on responses to Army comments on the draft Garden Soil Sampling Work Plan. Field work is planned for the middle of August. Mr. Woods asked about the proposed Christmas tree farm. Ms. Hutton stated that she believes the plan is on hold. She had sent an email to Barnhart Crane conveying EPA's opinion that gardening was not allowed by the Land Use Controls (LUCs). Barnhart Crane forwarded the email to Landmark, who is running the project, and there has been no further communication. Mr. Woods stated that perhaps the Christmas tree farm can be accommodated next spring/summer, pending results and EPA's position. Ms. Hutton said that Barnhart Crane had collected a soil sample last summer, which was non-detect except for a low level of arsenic which exceeded regional screening levels (RSLs). Mr. Woods replied that TDEC had established a slightly higher arsenic background due to pesticide use throughout "cotton country." TDEC's background normal is around 12 to 15 ppm, so if the sampling result was in that range, the land may still be suitable. Ms. Hutton expressed appreciation for that information and stated that another concern will be the time and cost required to revise the Land Use Control Implementation Plan.

Ms. Hutton asked about the remaining submittals for two HDR task orders scheduled to close in September, CK04 and REAT-2. Mr. Holmes stated that submittals for the CK04 task order are limited to the 2018 Long-Term Monitoring (LTM) Rev 1 report and the April LTM Summary

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

11 June 2019

10:30 EDT

Report, and that the documents should be completed by September 2, 2019, as required. Mr. Holmes noted that the SRI Phase 4 and the Vapor Intrusion tasks on the REAT-2 contract would extend past the task order completion date. Options for extending or revising task orders were discussed and it was decided that further discussion would be held on a later call.

DUNN FIELD

Remedial Action

Status of AS/SVE operations

Mr. Calhoun stated that June is a full operation month for the AS/SVE system. The AS manifold was opened on 28 May and will remain open through the end of June. The manifold will be closed through July, which ends the Year 8 operating period.

AS/SVE Reports

Mr. Calhoun stated Year 8 Quarter 4 effluent sampling was conducted on 4 June. Once the June sample results are evaluated and the final operations data are collected in July, preparation of the Year 8 Annual Report will begin.

The Year 8 Semiannual Report was submitted to TDEC and EPA on 5 June. Comments will be due on 5 August. Comments will be addressed in the Annual Report.

Mr. Calhoun stated that “we have stopped making as much water from the system” perhaps due to drier weather, although flow valves for the SVE wells have also been adjusted. Mr. Woods asked if the water has damaged system components. Mr. Calhoun stated any damage would be minimal given that the components at that point are not mechanical. The crew has removed, cleaned and reassembled components. Mr. Calhoun doubted that there was any lasting damage to the piping or the condensate tank. The water does not appear to be heavily impacted by iron and iron staining is not an issue in the condensate tanks.

AS Well Installation Access

Mr. Calhoun asked if there is an expected timeframe for the EPA letter to MLGW. Ms. Hutton replied the letter was being routed through EPA and there is not a set date for submittal.

Mr. Woods asked about CVOC concentrations in MW-159. Mr. Calhoun referred the question to Mr. Holmes who stated that the April 2019 concentration for trichloroethene, the main contaminant, was about 90 parts per billion and the concentration continues to decrease over time.

Offsite Investigation

Mr. Holmes stated that the Offsite Groundwater Investigation QAPP is being reviewed by Army and USACE Mobile. Mr. Holmes said he and Ms. Hutton had a call with Cintas regarding access to the two wells on that property. The Cintas representative, Pat Kneip, believed HDR should have obtained an access agreement prior to sampling in 2017; Mr. Holmes had replied that the wells were installed by TDEC and sampled with their knowledge but, in hindsight, probably should have requested access from Cintas. Mr. Holmes asked if TDEC had an access agreement with Cintas. Mr. Woods wasn't sure, but imagined any agreement would have expired. Mr. Woods said he would check on the status of the agreement and if it could be easily renewed. Ms. Hutton stated that Mr.

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
11 June 2019
10:30 EDT

Kneip is Director of Chemical & Environmental Engineering for Cintas and is well informed on environmental issues. He stated that DCE is not a product used in the laundry service and suspects that it is something moving onto the property from the northeast.

LONG TERM MONITORING (LTM)

Mr. Holmes noted that the 60-day comment period on the 2018 LTM Report has passed. Ms. Roebuck added that comments will be needed soon in order to complete the report by the end of August.

Mr. Holmes stated that the April 2019 LTM Report was recently submitted to Army and USACE Mobile for review, and will likely be submitted to TDEC and EPA in mid-July. TDEC or EPA comments on the report will be incorporated into the 2019 Annual Report, though it would be helpful to receive comments in order to submit responses before the end of August.

OTHER ISSUES

CK04 Contract Close-out

Because the close-out was already discussed, Mr. Holmes noted that the priority documents for review are the 2018 LTM Report and the SRI Phase 4 and Indoor Air QAPPs.

Community Information Line (CIL)

No calls were received in May.

Submittal Schedule

Ms. Hutton sent the updated submittal schedule to the project team on 7 June. Ms. Hutton stated that new documents would be shown on separate tab for the schedule.

Action Items

Mr. Holmes stated that there were no action items from the call in May.

The next call will be Tuesday, 9 July at 10:30 AM EDT, 9:30 AM CDT, and 8:30 AM MDT. The dial-in number will be 800-207-9558, and the access code will be 2049034#.