

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

9 July 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 – Bill Woodall; Laura Roebuck (absent); Melissa Shirley (absent)

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods (absent)

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

HDR EOC – Tom Holmes

Trinity – Todd Calhoun

GENERAL

EPA Community Driven Solutions (CDS) Initiative

Ms. Lloyd stated that Memphis is one of the focus areas for the CDS Initiative and that DDMT may be selected for inclusion in the Initiative. She stated that the EPA's Federal Facilities Restoration and Reuse Office (FFRRO) is looking for good news site re-use stories to showcase, and that they have inquired about including DDMT. She explained that the CDS Initiative seeks to highlight facilities that have been reused, including transfer to private owners. Ms. Lloyd clarified that DDMT wouldn't be considered until next year; she would like to be further along with the soil vapor intrusion study before highlighting the site.

Ms. Hutton mentioned actions that DDMT currently performs for the community, including providing a fact sheet ahead of the upcoming drilling upgradient of Dunn Field. Ms. Lloyd recommended that the fact sheet be reviewed by the regulatory agencies since the activity is being done under the Federal Facilities Agreement (FFA). Ms. Lloyd offered that the review would take no longer than five days, probably only two days.

EPA letter to Memphis Light, Gas and Water (MLGW) for Air Sparge/Soil Vapor Extraction (AS/SVE) and Data for Allen Wellfield

Ms. Lloyd stated an EPA letter, signed by Ms. Lloyd's direct manager and Federal Facilities branch manager, was sent to the president of MLGW. Ms. Charlotte Knight Griffin of MLGW has since contacted Ms. Lloyd and intends to send a proposed access agreement by 8 July. Ms. Hutton added that the access agreement might be in MLGW's format, and the USACE Mobile Real Estate office has granted an exemption to their typical format requirements for this agreement. Ms. Hutton and, later, Mr. Calhoun thanked Ms. Lloyd for this effort. Ms. Lloyd thanked the Army and USACE Mobile for their help.

Mr. Holmes summarized the history of seeking MLGW data for the Allen Wellfield for use in developing a groundwater model. When the modeling task began in 2017, HDR requested the data from the environmental group at MLGW; the request was considered by senior management but release of the data (pumping rates and water levels for individual wells) was not approved. The only available information was from MLGW reports to TDEC listing daily total pumping rates for the

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wellfield. HDR continued preliminary construction of the model while seeking other data sources, including contacts with U.S. Geological Survey (USGS). HDR prepared a conceptual site model (CSM) memorandum describing the groundwater model that was reviewed internally and sent to EPA and TDEC.

It was decided the groundwater model would not be useful without additional data to calibrate the model results. Installation of a Memphis aquifer (MAQ) well near the wellfield was considered as a source for the necessary data. USGS was engaged to assist with review of the model and planning for the well; a copy of the CSM memo was provided for review. After further consideration, the project team decided data from one well would not be sufficient for the model.

Further modeling is on hold, and HDR is to revise the CSM memo to address USGS comments in order to complete the revised scope of work (SOW). If additional data sufficient to prepare a useful model become available, then the Army can decide to proceed with a new task order. Ms. Lloyd stated that she thinks this merits further discussion, especially with the possibility of better dialogue with MLGW. Ms. Hutton agreed that the improved communication with MLGW is promising, though she is wary of the time limit of the current SOW. Ms. Lloyd asked if a summary of the modeling effort would be captured in a report; Mr. Holmes answered that a summary will be included in the final Supplemental Remedial Investigation (SRI) report next spring.

MAIN INSTALLATION

Remedial Action - No current remedial action

SRI/Focused Feasibility Study (FFS)

Phase 4 Quality Assurance Project Plan (QAPP)

Mr. Holmes stated that TDEC approval of the Phase 4 QAPP was received at the end of June and that EPA comments were received on 1 July. HDR will prepare the response to EPA comments for review and submittal.

Mr. Holmes noted that, as follow-up to Phase 3 response to comments, Ms. Lloyd had sent an email regarding access for the Intermediate Aquifer (IAQ) well northwest of the Main Installation (MI). He stated that Ms. Hutton had recently received a signed agreement from the property owner, and the well will be installed during Phase 4. Mr. Holmes reminded the team that the Phase 3 report will be wrapped into the final SRI report.

Mr. Holmes expects that Phase 4 fieldwork will take place in early fall (September or October).

Risk Assessment

Mr. Holmes stated that HDR is working on the additional data review and the Human Health and Ecological Risk Assessment (HHERA) revision per the final responses to EPA comments. Once that is finalized, HDR will prepare the QAPP for additional sampling and risk assessment.

Vapor Intrusion (VI) Study

Mr. Holmes stated that EPA comments were submitted in June on the January 2019 VI Soil Vapor Sampling technical memorandum. HDR has begun responses to the comments.

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Additional SRI

Mr. Holmes stated that the final Vertical Profiling Work Plan has been completed. HDR is confirming the schedule with the subcontractor, and the fieldwork is expected to occur in August.

Mr. Holmes noted that HDR is preparing a CSM Update, separate from the groundwater model, and is reviewing the site data, including water levels, analytical data, boring logs and site stratigraphy. The review should be completed in September with a memo report that will incorporate the vertical profiling results. That report will then be wrapped into the final SRI report.

Mr. Holmes stated that HDR is continuing to work on the responses to USGS comments on the groundwater CSM. Ms. Lloyd asked if EPA had received a copy of the USGS comments. Mr. Holmes replied that if she had not already been sent a copy, the comments would be included in the future report.

Mr. Holmes stated that 18 shallow vapor monitoring points (VMPs) in three target areas were installed in June for the SVE Pilot Test; the VMPs are screened in fluvial deposits at depths of 30 to 40 feet below ground surface. Vapor samples were collected and lab results should be available in mid-July. By the end of July, HDR will review the data and provide recommendations for the pilot test location. The SVE well and a deep VMP will be installed in the selected area to a depth of approximately 70 feet below ground surface, approximately 10 feet above the water table. The six-month pilot test will then begin.

Mr. Holmes stated the final Garden Sampling Work Plan has been completed. HDR plans to collect samples in August during other fieldwork.

DUNN FIELD

Remedial Action

Mr. Calhoun stated that the Year 8 Quarter 4 effluent samples were collected in June and the analytical results have been received. The results for the chlorinated volatile organic chemicals (CVOCs) usually observed were in line with previous results. However, there were odd results for other volatile organic chemicals (VOCs); the effluent was re-sampled this morning (9 July) for the laboratory analysis. The results from both samples will be provided in the Annual Report for Year 8 which ends 31 July.

Mr. Calhoun stated that the manifold was kept open a week longer than usual in order to collect the sample. The manifold was closed today and the system will be on standby through the end of July. The manifold will be re-opened in August.

Mr. Calhoun stated that the Semiannual Report is in review with EPA and TDEC. Comments are due on August 6. Any comments will be addressed in the Annual Report.

Ms. Hutton stated that, to install the additional AS wells, it will be necessary to re-contract through USACE Mobile. Once that agreement is in place, the process to install the wells will begin. The award is expected in December with plan for Trinity to install the wells in January. An added year of Operation and Maintenance (O&M), Year 10, will be included in that contract.

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Offsite Investigation

Mr. Holmes stated that HDR is preparing responses to Army comments on the Offsite Investigation QAPP. Once responses are approved, Revision 0 will be prepared and submitted for regulatory review. Mr. Holmes noted that ten wells will be installed; one well is on Army property, three wells are on City of Memphis right-of-way and six wells are on private property. USACE has sent access and right-of-entry agreements to three of the property owners with the other three agreements in preparation.

LONG TERM MONITORING (LTM)

Mr. Holmes stated the 2018 LTM Annual report is in review by EPA and TDEC and that HDR is preparing responses to internal comments on the April 2019 LTM Report.

OTHER ISSUES

Mr. Holmes stated phone calls to property owners and Shelby County Health Department for the 2019 annual site inspections of the MI and Dunn Field will begin this week. Once that information has been compiled, the visual inspections will be conducted and a report prepared documenting the inspections.

Mr. Holmes stated that Administrative Record (AR) compilation compact discs (CDs) were submitted to the project team on 12 June. The seven CDs contain all AR documents through December 2018 and replace the previously submitted set of AR CDs.

Mr. Holmes noted that HDR is also working on an Information Repository (IR) compilation. The IR includes the AR and other documents. The last step for the compilation is to review print copies in the IR for recommendation of documents for scanning and subsequent inclusion in the AR or IR.

Mr. Holmes stated that HDR is preparing responses to regulatory comments on the Community Information Plan.

Mr. Holmes stated that no calls were received on the Community Information Line in June.

Mr. Holmes noted that the only items left on the CK04 Contract prior to close-out are the LTM reports (2018 LTM Annual Report and the April 2019 LTM Report) and hardcopy submittal of the AR to the Washington National Records Center (WNRC). These items should be resolved by contract closing at the beginning of September. Ms. Hutton thanked Ms. Lloyd for reviewing the priority documents to enable contract close-out.

Ms. Hutton submitted the updated submittal schedule on 8 July. Ms. Hutton noted that the first tab contains 32 documents of which seven or eight are unfinished but with plans to complete them.

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A list of priority documents requiring regulatory review was developed following discussion on the July internal team call; this list was included on the agenda and is provided below

Prioritized List of Documents for Regulatory Review

1. Offsite Groundwater Investigation QAPP (to be submitted 16 July). When submitted, this will report will take precedence for it directly impacts the transfer of Dunn Field West.
2. Annual LTM Report – 2018 (submitted 18 March).
3. VI Indoor Air Sampling QAPP (submitted 24 April).
4. Off Depot AS/SVE, Year 8 Semiannual Operations Report (submitted 5 June).

Action Items

Ms. Hutton reiterated that the fact sheet for upcoming drilling will be submitted for regulatory review. Ms. Hutton also stated that the loop will not be closed regarding getting groundwater data from MLGW for the groundwater model.

The next call will be Tuesday, 13 August 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#.