

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**8 October 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 – Bob Beacham (absent); Laura Roebuck (absent); Melissa Shirley

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

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

HDR EOC – Tom Holmes

Trinity – Todd Calhoun

**GENERAL**

**MAIN INSTALLATION**

**Remedial Action** - No current remedial action

**SRI/Focused Feasibility Study (FFS)**

Phase 4

Mr. Holmes stated that the Phase 4 field investigation is underway. The third shift of fieldwork began on Monday, 7 October. Ten of the 12 planned Fluvial Aquifer wells have been installed as well as both Intermediate Aquifer (IAQ) wells. The last two Fluvial Aquifer wells and two nested wells are to be installed in the current shift, with sampling to be completed in a final shift beginning 21 October.

Ms. Hutton asked how things went with the IAQ well on the Belz property. Mr. Holmes responded that the field work went well and that he kept Jay Snow informed. In general, depths to water and total depths for Phase 4 wells have differed only slightly from initial estimates. Ms. Hutton asked if there was indication of contamination. Mr. Holmes answered that no samples have been submitted yet, but there has been no visible signs of contamination.

Risk Assessment

Mr. Holmes stated he would like to finalize the HHERA Revision 1, but requires EPA approval or comment on the core of the plume memo submitted in August. Once Revision 1 is finalized, HDR can begin work on the Quality Assurance Project Plan (QAPP). Ms. Hutton said she would send a reminder to Ms. Lloyd for comments on the core of the plume memo.

Vapor Intrusion (VI) Study

Mr. Holmes stated that draft responses to EPA comments were submitted for Army review at the end of September. Mr. Holmes stated that the next step would be a call with EPA to discuss the responses and plans for indoor air sampling.

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Additional SRI

Mr. Holmes stated that HDR is working on the vertical profiling report and on the Conceptual Site Model (CSM) update memo. Mr. Holmes said the CSM update review did not find that significant changes to the CSM were required but does provide additional information to support the CSM.

Mr. Holmes stated that he is still working on revisions to the groundwater model CSM per approved responses to the U.S. Geological Survey (USGS) comments.

Mr. Holmes reported that the soil vapor extraction (SVE) pilot test is going well. The system operated throughout September without downtime. HDR collected a second round of effluent samples on 9 September. Mr. Holmes explained that the system has a dilution valve that pulls ambient air from aboveground to be mixed with the vapor pulled from the well. Sample 1 was taken with the dilution valve open, and Sample 2 was taken with the dilution valve closed. With the dilution valve open, the system operates below Shelby County Health Department (SCHD) discharge criterion for permit exemption, which is 0.1 pounds per hour. If the system ran with the dilution valve closed, it would exceed the discharge criterion.

Mr. Holmes added that effluent sample results indicate there is enough contamination in soil vapor to maintain concentrations for at least a couple of weeks. Therefore, the SVE system should have an impact on migration of contaminants to groundwater. Mr. Holmes believes it will be too early to see an effect in the LTM groundwater samples to be collected during the LTM event this month, but he expects to see reduced CVOC concentrations in the April 2020 LTM sample results. Mr. Holmes noted that the next SVE effluent sampling event, after three months of operation, is scheduled for late November/early December.

Mr. Holmes stated that the sample results from the FU4 Garden on the Barnhart Crane property were received and that data quality evaluation (DQE) and data validation are in progress. Ms. Hutton asked what the results show, but Mr. Holmes stated he is waiting for the DQE to be complete before reviewing sample results.

**DUNN FIELD**

**Remedial Action**

Mr. Calhoun stated that the Air Sparge (AS)/SVE system is not currently operating. As Mr. Calhoun reported during last month's team meeting, the SVE blowers were rendered inoperable by a faulty PLC component. Tristate Armature has been working to repair the system; however, the damage was more extensive than originally indicated and has affected the AS side of the system. The original PLC components are outdated, but Tristate can rebuild the system with new, similar components and is tracking down those replacements. Mr. Calhoun expects to have a schedule by the end of this week of when the replacement parts will be available and installed, and when the system will be returned to operation. At that point, the Year 9 Quarter 1 effluent sample will be taken.

Mr. Calhoun stated that the Year 8 Annual Report was submitted for Army review on 6 October. The comment period will be through early November, so the report will likely be submitted for regulatory review in mid-November.

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Ms. Hutton stated that she spoke with Charlotte Griffin of Memphis Light, Gas and Water (MLGW) on Friday, 4 October. Ms. Griffin's concerns about the right-of-entry agreements revolve around the anti-deficiency and indemnification language. Ms. Griffin is going to speak one-on-one with Buddy Wagoner of USACE Office of Counsel regarding anti-deficiency and will look at other agreements that MLGW has signed to find indemnification language that might be acceptable to both the Army and MLGW. Ms. Hutton has sent Mr. Wagoner an aerial photograph showing the AS/SVE system location with the adjacent MLGW substation and power lines so that he is prepared for Ms. Griffin's call. Ms. Hutton will contact Mr. Wagoner in two weeks to check on progress.

**Offsite Investigation**

Mr. Holmes stated that TDEC approval of the Offsite Investigation QAPP was received on 20 September, and HDR is making progress with access agreements on Glory Circle residences. Cintas is still in discussion and review at USACE. Mr. Holmes said the owner of the Wabash Avenue site location doesn't want the well on his property out of concern that it will impact his development plans. Denise Cooper of HDR will contact him again in the next couple of weeks. HDR has begun working on permits for well locations within city right-of-way. The first step, to obtain permits from Shelby County Health Department, is in progress. Mr. Holmes believes HDR will have the city permit by the time of EPA's approval or comments are received.

Mr. Holmes stated that planning for an investigation in the MW-87 area is moving forward. A brief summary of the plan was provided prior to, and discussed during, a conference call with Army, EPA and TDEC on 24 September. The discussion indicated the plan is generally acceptable to EPA and TDEC. HDR would like confirmation of EPA's and TDEC's acceptance of the planned investigation. Mr. Woods stated he would send an email to Ms. Hutton with his approval of the proposed investigation.

**LONG TERM MONITORING (LTM)**

Mr. Holmes stated that the 2018 LTM Annual Report, Revision 1 was submitted on Friday, 4 October. There have been no comments on the April 2019 LTM Report. Mr. Holmes said that work will soon begin on the 2019 LTM Annual Report. If comments are received on the April 2019 report, they will be incorporated into the annual report.

Mr. Holmes stated that sampling for October 2019 LTM began on Monday, 7 October. A water level sweep is in progress now, and sampling will be completed by 16 October.

**OTHER ISSUES**

Mr. Holmes stated the draft Information Repository (IR) compilation disc was submitted for internal review on 19 September, and comments have been received from USACE Mobile. Ms. Hutton asked if, given USACE comments about missing documents, she needed to do further review of the IR disc. Mr. Holmes responded that, if she had comments about other aspects of the IR, it would be helpful to have those comments before another version of the disc is prepared.

Ms. Hutton asked if Mr. Holmes had heard anything from the Washington National Records Center (WNRC) regarding submittal of Administrative Record (AR) documents. Mr. Holmes stated that his

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only information was that Army records management staff had entered the information in ARCIS and submitted it to WNRC. Mr. Holmes will ask Ms. Cooper to follow up. He noted that the submittal is the only remaining task on the CK04 contract.

Mr. Holmes said that HDR is in process of drafting the annual newsletter, EnviroNews. The story list has been determined, with updates on what is going on at the Main Installation and Dunn Field and projected work for the next year. Submittal is scheduled for mid-December.

Mr. Holmes stated there had been no calls on the Community Information Line in September.

Ms. Hutton sent the updated Submittal Schedule to team members 7 October. Ms. Hutton stated that blue shading across a row indicates that the item is complete. If an item does not have shading, in most cases the item falls under a contract that has more time. Ms. Hutton said the April 2019 LTM Report will remain uncompleted.

Ms. Hutton stated that she considered sending a meeting invitation to EPA and TDEC for discussion of the Brownfields program for MW-87; however, she wonders if that has been overtaken by events, specifically that a Superfund site cannot be part of a Brownfields program. Mr. Woods responded that the state-level Brownfields program has some flexibility on that issue. TDEC is currently working on taking a National Priorities List (NPL) site into the state Brownfields program, though Mr. Woods noted that there is still some debate on liability protection. Mr. Woods will watch the progress of the other NPL site and update the team if a solution seems applicable to Dunn Field.

Mr. Woods asked if the Finding of Suitability to Transfer (FOST) gives liability protection to the purchaser. Ms. Hutton responded that it does not in the same way that the Brownfields program does. But Ms. Hutton did note that CERCLA clauses are put into the deed and the FOST, as are environmental protection provisions; thus, as long as the purchaser has not contaminated the property, the Army is still responsible. Mr. Woods agreed that is also how TDEC views the situation.

Ms. Shirley asked if there was a deadline regarding internal review of the responses to EPA comments on the soil vapor sampling memo. Ms. Hutton offered to initiate a conference call to resolve the concerns. Ms. Shirley asked if other documents were waiting on resolution of the comments. Mr. Holmes responded that one of EPA's comments indicated reluctance to proceed on the indoor air sampling QAPP until the soil vapor sampling concerns are addressed; this means that HDR cannot move forward on that work until the comments are addressed.

Ms. Hutton asked about Ben Bentkowski of EPA providing input on the soil vapor sampling. Mr. Holmes responded that Mr. Bentkowski had provided some of the comments and that it would be helpful to have him on a conference call to resolve the comments.

Ms. Shirley stated that Ms. Roebuck plans to observe the offsite investigation field work scheduled for November.

Action Items

- Ms. Hutton will send a reminder to Ms. Lloyd regarding the core of the plume memo. (Completed 10 October)
- Mr. Woods will email Ms. Hutton with his approval of the initial plans for MW-87 investigation. (Completed 8 October)

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- Mr. Holmes will ask Ms. Cooper to follow up on the AR submittal to WNRC. (Completed 11 October)

Prioritized List of Documents for Regulatory Review

1. Revised Core of the Plume Memorandum (submitted 19 August)
2. Offsite Groundwater Investigation QAPP (submitted 16 July)
3. Indoor Air Sampling QAPP (submitted 24 April)
4. 2019 Annual Site Inspections of MI and Dunn Field (submitted 27 August)

**Next Meeting**

The next call will be Tuesday, 12 November at 10:30 AM EST, 9:30 AM CST, and 8:30 AM MST.  
The dial-in number will be 800-207-9558, with access code 2049034#.