

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
12 November 2019
10:30 EST

LOCATION: Conference Call

ATTENDEES:

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

CALIBRE BEC – Joan Hutton

USACE, Mobile – Bob Beacham; Laura Roebuck; Melissa Shirley (absent)

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

MAIN INSTALLATION

Remedial Action - No current remedial action

SRI/Focused Feasibility Study (FFS)

Phase 4

Mr. Holmes stated that the Phase 4 fieldwork is wrapping up. Twelve Fluvial Aquifer wells, two Intermediate Aquifer (IAQ) wells and two nested wells were installed. Each nested well has four screens, two in fluvial sands and two in IAQ sands. The final well will be sampled today and water level measurements will be made in all Phase 4 wells and LTM wells listed in the QAPP. Laboratory results should be received in about two weeks, at which time HDR will begin preparation of the report.

Risk Assessment

Mr. Holmes stated EPA approval on the core of the plume memo was received. This will allow HDR to wrap up Revision 1 of the Human Health and Ecological Risk Assessment (HHERA). Once Revision 1 is finalized, HDR will complete the data review and begin work on the Quality Assurance Project Plan (QAPP).

Vapor Intrusion (VI) Study

Mr. Holmes stated that responses to EPA comments were submitted earlier this month. Ms. Hutton has sent an invitation for a conference call to discuss the responses and plan for indoor air sampling. The Army team would be available on Tuesday, 19 November, for a call ending by 11:00 am EST or for a call beginning after 3:30 pm EST. If that day does not work, Ms. Hutton said that a call could be scheduled for the following week (Thanksgiving week). Mr. Woods and Ms. Lloyd agreed to check their schedules.

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Additional SRI

Mr. Holmes stated that the reporting for the vertical profiling in August has been delayed by other activities. Mr. Holmes noted that the profiles did not reach the target depth of 150 feet. Each profile reached refusal at approximately 120 feet, which is only 25 feet below the water table. HDR used the limited profile data to select screen depths and sample locations in the shallow section of the aquifer.

Mr. Holmes reported that he has reviewed the draft Conceptual Site Model (CSM) update memo. The data was useful, though it did not change the site model of three aquifers, and windows with vertical connections between the aquifers. The memo will be submitted for Army review soon.

Mr. Holmes stated that the soil vapor extraction (SVE) pilot test in TTA-2 (southeast MI) is shows positive results. Based on analytical results for samples collected at startup and in early September and the vapor flow rates, HDR estimates that approximately 61 pounds of chlorinated volatile organic compounds (CVOCs) were removed through September; only CVOCs have been reported at high concentrations in vapor samples from VMPs and the SVE well installed for the pilot test. HDR has provided interim data reports to the Army and USACE Mobile, and will include the data in the SRI report.

Ms. Hutton noted the estimated mass removal was similar to the removal achieved by the Air Sparge (AS)/SVE system in Dunn Field. Mr. Holmes agreed; the AS/SVE system has removed approximately 86 pounds of VOCs since startup, with approximately 70 pounds removed in the first year. Mr. Holmes noted that the AS/SVE is not expected to remove as much mass because it removes VOCs by air bubbling through the Fluvial aquifer and there is only a small mass of VOCs in groundwater in that area. Ms. Hutton asked if more contamination could be extracted if the system was not limited by the Shelby County Health Department (SCHD) emission restriction. Mr. Holmes agreed that it could, but the work plan was based on keeping the discharge below the SCHD permitting criterion (0.1 pounds per hour) and did not include effluent treatment to reduce the discharge. Following startup testing, the system ran with the dilution valve closed; HDR calculated the mass removal based on the initial sample results, was just above the SCHD criterion. The dilution valve was then opened for full dilution. As a result, the total flow of approximately 280 cubic feet per minute (cfm) includes about 125 cfm from the SVE well and the remainder from ambient air. Mr. Holmes stated that samples will be collected again in December, and those sample results might indicate that the amount of dilution can be reduced. Mr. Holmes also stated that initial review of October 2019 LTM samples from TTA-2 wells with high CVOC concentrations in recent samples indicated the concentrations were lower in October.

Garden Sampling

Mr. Holmes stated that the Garden Soil Sampling Report was submitted for Army review on 6 November. Soil samples were collected at two depths from eight locations in the former garden area on the Barnhart property; one sample was collected from an aboveground container used in the garden. Results were below industrial regional screening levels (RSLs) for all analytes, except arsenic. All samples exceeded the industrial RSL for arsenic, but only one sample exceeded the background concentration for arsenic (16,500 parts per billion [ppb]); the background study for DDMT was conducted in 1998 by CH2MHill. Mr. Holmes noted that there were other exceedances of residential limits for a few polycyclic aromatic hydrocarbons (PAHs) and one pesticide. Mr.

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Woods asked about the background arsenic concentration, stating that TDEC generally believes that pesticide use in cotton country is the cause for the high background concentration of arsenic in western Tennessee. Mr. Holmes stated that the background concentration for arsenic is 16,500 ppb, and the sample was 16,900 ppb. Mr. Woods stated that a range of 12,000 to 15,000 ppb are normal background values for As in Western TN.

Ms. Lloyd asked if Barnhart still wants to pursue activities in that area. Mr. Holmes responded that this data has not been presented to them yet, but Barnhart had not used the garden area since concerns with that use were raised in June 2018; he was not sure whether Barnhart had participated in the Landmark internship program for other activities this past year. Ms. Hutton stated that she did not think Barnhart would want to use the garden area in the future.

Ms. Lloyd asked the status of access for the AS/SVE expansion from Memphis Light, Gas and Water (MLGW). Ms. Hutton explained that on 1 November Ms. Lloyd had emailed Charlotte Griffin of MLGW, noting that it had been three months with no progress on the access. On 8 November, Ms. Griffin sent a revised access agreement. Buddy Wagoner, a USACE attorney in Mobile, was a recipient of Ms. Griffin's email. Ms. Hutton sent him an email this week reminding him of the importance of this agreement and of how long the team has worked on this.

DUNN FIELD

Remedial Action

Mr. Calhoun noted that, as discussed on the October call, the AS/SVE project logic controllers (PLCs) were damaged and the system has been offline; repairs were completed and the normal system operations resumed on 22 October. The Year 9 Quarter 1 effluent sample was collected 31 October. The system will continue running through this week. The AS manifold will then be closed until 1 December, and the next effluent samples will be collected a few days later.

Ms. Lloyd asked about the damage. Mr. Calhoun stated that a power surge had traveled through the phone lines, melted PLC ethernet ports and damaged the modem. The PLCs were replaced, and additional work to update the PLC software is being considered for later in Year 9.

Mr. Calhoun stated that the Year 8 Annual Report, Revision 0 will be sent for regulatory review on 15 November.

Ms. Hutton introduced a planned change to language in the submittal letters for documents being submitted to EPA and TDEC. For interim reports, where the site activities and data will be included in a later report, the cover letter will change from "submitted for your review" to "submitted for your records." This change is in accordance with the Federal Facilities Agreement and is hoped to ease the burden on the regulatory agencies. The regulatory agency project managers are still able to submit comments on documents submitted for record and those comments will be incorporated into the associated final report as is currently done (for example, comments on a semi-annual LTM report would be incorporated into the annual LTM report). Mr. Woods said he appreciated the change. Ms. Lloyd said she agreed with the change for LTM and operations report, such as for the AS/SVE system, but that without more clarity she could not provide a blanket agreement for this change. The reports to be "submitted for your records", the number of documents being submitted and the

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document review period was discussed further. Army will proceed with the change in submittal letters as noted but is open to further discussion as needed.

Offsite Investigation

Mr. Holmes stated that there are two other activities related to Dunn Field. The first is the Offsite Investigation, for which a Quality Assurance Project Plan (QAPP) has been submitted for review. Nine offsite wells are planned in this investigation; a tenth well is located on Dunn Field. Access agreements are expected to be completed soon for all but one of the offsite wells. Mr. Holmes stated the property owner for one location near Wabash Avenue has not been responsive; the well location (F-10 in the QAPP) is a lower priority based on previous sample results for adjacent, existing wells.

Ms. Lloyd asked if there should be a call regarding the offsite investigation, for she questions some of the wells. She is concerned that there are no deep wells planned, and she doubts that anything will be found in the proposed shallow wells. Mr. Woods asked if by “deeper wells” Ms. Lloyd meant Memphis sand wells. He stated that all the TDEC wells are installed in the Fluvial aquifer, and the offsite investigation is to address the data gaps. Mr. Holmes added that there is a thick clay layer in the offsite area, as there is throughout Dunn Field, which limits potential migration into deeper aquifers, and that the purpose of the investigation is to evaluate offsite groundwater contamination within the fluvial aquifer. Ms. Hutton asked if Ms. Lloyd could provide comments on the Offsite Investigation QAPP ahead of a call. Ms. Lloyd responded that she had sent comments. Ms. Hutton and Ms. Lloyd agreed to search through their respective email for the comments.

Mr. Holmes stated that the second activity underway on Dunn Field is the preliminary investigation of contamination around MW-87 and in the offsite area west of Dunn Field. A proposal based on the scope previously discussed with EPA and TDEC has been submitted to USACE Mobile. Army hopes to begin that work this year, if possible. Ms. Hutton added that funding is tight at the beginning of the fiscal year, and Mobile has done everything they can to get the contract working.

LONG TERM MONITORING (LTM)

Mr. Holmes stated that the October LTM sampling was completed during the middle of last month. Analytical data has been received, and preparation of the report has begun. Mr. Holmes noted that two of the wells in TTA-2 had somewhat lower CVOC concentrations and that CVOC concentrations at MW-159 in the AS/SVE area continue to decrease slowly.

OTHER ISSUES

Mr. Holmes stated that HDR will soon submit the Information Repository (IR) on compact disc. Mr. Holmes noted that the Administrative Record (AR) documents were provided on discs last year. The IR encompasses the AR documents, as well as additional documents specific to the IR. The IR disc will contain the IR index, which lists all IR documents including AR documents. The disc will also contain all documents specific to the IR and all AR documents that have been added since last year’s AR compilation. Using the IR disc and the AR disc, the entire library of DDMT documents will now be available on disc.

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Mr. Holmes stated that EnviroNews, the annual newsletter, is being prepared. The draft articles are being reviewed by the Army and USACE Mobile. The newsletter is scheduled to be sent to the public in the middle of December.

Mr. Holmes stated there had been no calls on the Community Information Line in October or the beginning of November.

Ms. Hutton discussed the updated Submittal Schedule for 6 November provided with the agenda.

Action Items

- Mr. Woods and Ms. Lloyd will check their schedules for a conference call on 19 November to discuss the Vapor Intrusion Study responses to EPA comments. Ms. Hutton will follow up with a meeting invitation as appropriate.
- Ms. Lloyd and Ms. Hutton will look for the EPA comments on the Offsite Investigation QAPP.

Prioritized List of Documents for Regulatory Review

1. Offsite Groundwater Investigation QAPP (submitted 16 July)
2. VI Indoor Air Sampling QAPP (submitted 24 April)
3. 2019 Annual Site Inspections of MI and Dunn Field (submitted 27 August)

Next Meeting

The next call will be Tuesday, 10 December 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#.