

Environeeus Winter 2019



Work Continues to Meet Depot Cleanup Objectives

The Army is continuing work on several projects to move the former Memphis Depot environmental cleanup closer to the objectives called for in the Main Installation and Dunn Field Records of Decision.

Projects include installing Phase 4 groundwater monitoring wells, collecting additional data for the vapor intrusion study, and conducting a soil vapor extraction study for the Main Installation Supplemental Remedial Investigation (SRI). The Army continues working to expand the Off Depot Groundwater cleanup system west of Dunn Field and plans to investigate groundwater contamination moving onto Dunn Field.

In 2015, the Army began SRI Phase 1 to define areas on the Main Installation where additional cleanup actions are needed to meet the cleanup objectives and to identify areas where contamination is moving on to the Main Installation from off-site sources. Groundwater monitoring shows that overall the contaminant levels went down after cleanup actions that ended in 2014. However, contaminant levels in some wells in the treatment areas and other locations on the Main Installation were not reduced by the vapor extraction study to prepare the final SRI Report in 2020. The Army will use the SRI Report to review alternative cleanup actions in a Feasibility Study that is to be completed in early 2021. The Feasibility Study is expected to recommend changes to the selected remedy for the Main Installation. The Army will provide a revised cleanup plan for public review and comment. The revised plan will be followed by a new decision document, either an Explanation of Significant Differences or a Record of Decision Amendment, that will placed in the Information Repository for public review.

The Off Depot Groundwater cleanup system continues to reduce groundwater contamination levels in the area northwest of Dunn Field. Since the Off Depot Groundwater cleanup system started in 2009, it has removed about 87 pounds of contaminants. Groundwater monitoring in the Off Depot area shows that the cleanup objectives have been met in all but one well. The Army is currently seeking property access from Memphis Light, Gas, and Water to increase the size of the Off Depot Groundwater cleanup system in order to complete the cleanup action.

cleanup actions. Monitoring also shows groundwater contaminants from off-site sources are moving onto the Main Installation at a few locations.

SRI Phase 4 was completed in November 2019 and included installing and sampling 14 more groundwater monitoring wells on and off the Main Installation. In August 2019, the Army began the soil vapor extraction study on the Main Installation in a former enhanced bioremediation treatment area where contaminants remain in the soil.

The Army will use results from SRI Phases 1 through 4, the continuing vapor intrusion study, and the soil



The Army installed more groundwater monitoring wells during the Supplemental Remedial Investigation Phase 4 to gather information about groundwater contamination on and around the Main Installation.

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Definitions

Aquifer: An underground geological formation, or group of formations, containing water. Aquifers are sources of groundwater for wells and springs.

Cleanup Objective: Also known as the Remedial Action Objective. A medium-specific (such as groundwater and soil) or areaspecific goal for protecting human health and the environment. Cleanup objectives are identified in Records of Decision.

Contaminant Level: A measure of how much of a contaminant is present in soil, water or soil vapor.

Explanation of Significant Differences: A public document that explains significant changes in the cleanup action from the original Record of Decision, such as changing part of the cleanup action with no change to the overall cleanup approach.

Groundwater: Water found beneath the earth's surface, usually in aquifers, which supply wells and springs.

Information Repository: A set of current information, technical reports, and reference documents regarding a Superfund site made available to the public.

Post Construction: Describes activities to make sure cleanup actions provide long-term protection of human health and the environment. Activities may include operation of cleanup systems; groundwater monitoring; land use controls; five-year reviews and additional investigations. Post construction activities continue until the cleanup objectives are met.

Record of Decision Amendment: A public document that explains fundamental changes in the overall cleanup approach from the original Record of Decision, such as the discovery of a new contaminated medium (e.g., contaminated soil or groundwater) that may change the overall cleanup approach.

Soil Vapor Extraction: A cleanup action that removes contaminants from groundwater by using wells to pull vapors from the soil.

Source: The starting point or origin of a contaminant entering the environment.

Vapor Intrusion: Occurs when vapors from a contaminant source below ground surface move into a building.

Army Investigating Two Areas of Dunn Field Groundwater

Long term groundwater monitoring results have identified contaminant levels on Dunn Field that require additional investigation of two areas, near monitoring well (MW) MW-87 and along the northern boundary.

Groundwater sample results show that contaminant levels have increased above the cleanup objective at MW-87, near the western fence. The Army plans to investigate the area of MW-87 and the offsite area to the west to see if the contaminants have moved off Dunn Field and if additional cleanup actions are needed.

For many years long term groundwater monitoring has shown contaminant levels above the cleanup objective in monitoring wells on and off the property along the northern boundary of Dunn Field. Monitoring results show that the contaminants may have an offsite source northeast of Dunn Field. In 2017, the Army conducted an investigation in the northeast corner of Dunn Field and found no sign of a contaminant source in the soil. Groundwater samples were collected from monitoring wells installed by the Depot and by TDEC in that area to provide current water levels and contaminant levels.

TDEC has approved and EPA is reviewing the Dunn Field Offsite Investigation work plan for additional groundwater investigation to provide more evidence that Dunn Field is not the source of contamination found in wells in the northern part of Dunn Field. The Army will begin investigations in both areas in late 2019 or 2020. Results of these investigations will be reviewed by the EPA and TDEC. The final investigation reports will be available to the public in the Depot's Information Repository.



The Army will conduct groundwater investigations northeast of Dunn Field and in the west-central area of Dunn Field and offsite to the west.

Plans for Dunn Field Transfer

The Army and the General Services Administration have begun the process to transfer the remaining 26 acres of Dunn Field through a competitive public sale. A sign about the sale will be posted on Dunn Field and notices placed in local and federal publications.

The Finding of Suitability to Transfer (FOST) #5 for this part of Dunn Field was provided for public comment and approved by the Army, EPA, and TDEC in 2010. The FOST will be updated by the Army before the sale.

Request Depot Documents Online

The Army upgraded the Depot's Information Repository (IR) by creating electronic versions of the IR documents and making them available through TDEC's public record request website.

The paper IR documents stored at the TDEC Memphis Field Office were removed, scanned and compiled with other IR documents on a compact disc (CD). The Army will provide TDEC with the IR CD for use in responding to public document requests. The public may request IR documents using TDEC's online public request website at https://www.tn.gov/ environment/contacts/public-records-request.html.

Requestors must identify the specific document for TDEC to provide. The IR Index on the IR CD lists all the documents available as of September 30, 2019, and will be updated annually. TDEC's project manager for the former Memphis Depot, Jamie Woods, can also assist in identifying specific documents.

Once TDEC processes the request, they will respond within seven (7) business days. Most former Memphis Depot IR documents can be emailed at no charge. For paper copies, TDEC charges a per page fee. See TDEC's online public request website or call (901) 371-3000 for more information on fees and on the records request process.

Superfund Environmental Cleanup Process

Preliminary Investigation/ Site Assessment

National Priorities List

Remedial Investigation/ Feasibility Study

Record of Decision

Remedial Design

Construction Complete

Former Memphis Depot's Progress in the Superfund Process

The Depot is currently at the Post Construction stage of the Superfund environmental cleanup process. The environmental cleanup systems required by the Main Installation and Dunn Field Records of Decision have been constructed. Some cleanup actions are complete and some cleanup systems are still operating. Other post construction activities include long term monitoring and additional

investigations such as the Main Installation Supplemental Remedial Investigation and the Dunn Field groundwater investigations. The investigations may lead to changes to the cleanup actions required by the Records of Decision. Post construction activities will continue until the cleanup objectives are met.

Current/Future Cleanup Activities

2019

- Continued operating and monitoring the Off Depot Groundwater cleanup action
- Conducted Long Term Groundwater Monitoring for the Main Installation and Dunn Field/Off Depot Area
- Conducted the Annual Land Use Controls Inspection
- Continued the Vapor Intrusion study for the Main Installation
- Installed Main Installation Supplemental Remedial Investigation Phase 4 groundwater monitoring wells
- Began a study of Soil Vapor Extraction
 on the Main Installation

2020

- Complete Main Installation Supplemental Remedial Investigation and Feasibility Study
- Begin preparation of a new decision document for changes to the selected remedy for the Main Installation; public review and comment will be requested
- Complete the Dunn Field Offsite Groundwater and MW-87 Investigations
- Add more wells to the Off Depot Groundwater cleanup system
- Continue operating and monitoring the Off
 Depot Groundwater cleanup system
- Conduct Long Term Groundwater Monitoring of wells
 on and around the Main Installation and Dunn Field
- Conduct the Annual Land Use Controls Inspection





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For Your Information

Former Memphis Depot Information Repository

Request documents from the Tennessee Department of Environment and Conservation (TDEC)

via their document request website at: https://www.tn.gov/environment/contacts/public-recordsrequest.html. You may also call (901) 371-3000 for assistance in requesting documents.

New Documents

- 2019 Site Management Plan
- 2018 Annual Land Use Controls Inspection
- Annual Long-Term Monitoring Report 2018
- Main Installation Supplemental Remedial Investigation
 Phase 4 Quality Assurance Project Plan

How to reach us...

If you have any questions or comments about the former Memphis Depot's environmental cleanup program, please feel free to contact any one of the following:

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EnviroNews is published by the former Memphis Depot to update the public on the environmental cleanup program. If you have comments, questions or suggestions for future articles, please call and leave a message on the Community

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