

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 December 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 (absent); Laura Roebuck; Melissa Shirley

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

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 all Phase 4 wells were installed, developed, and sampled: 12 Fluvial Aquifer wells, two Intermediate Aquifer (IAQ) wells, and two nested wells. Mr. Holmes received validated groundwater data on 9 December, and the report preparation began. Mr. Holmes stated that this will be a comprehensive report with findings from Phases 1, 2, and 3 as well as Phase 4. The report is to be submitted to EPA and TDEC in April 2020 and should be submitted for internal review in late February.

Risk Assessment

Mr. Holmes stated that HDR is making slow progress on completing the Human Health and Ecological Risk Assessment (HHERA) and associated Quality Assurance Project Plan (QAPP). Mr. Holmes expects progress will improve later this month and intends to submit the report in January.

Vapor Intrusion (VI) Study

Mr. Holmes noted that there will be a call on Thursday 12 December to discuss the responses to EPA comments on the Soil Vapor Sampling memo and EPA's thoughts on additional activities for the VI Study. Ms. Hutton noted that the period of performance (POP) for the task order will run through the end of 2020 and asked if that would be enough time to complete the necessary work. Indoor air sampling requires two sample events approximately 6 months apart (in cold and warm weather). Since the QAPP has not been reviewed by EPA or TDEC, sampling and reporting could probably not be completed by the end of 2020.

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In addition, Mr. Holmes stated that the amount of indoor air sampling specified in the statement of work (SOW) and discussed in the QAPP would not be sufficient based on the EPA's comments on the Soil Vapor Sampling memo.

Ms. Shirley asked for clarification about two proposed indoor air sampling locations. Mr. Holmes stated the two locations had multiple CVOCs in LTM samples above the risk criteria for VI impacts based on the VISL calculator and soil vapor samples with the highest VOC concentrations and estimated risk. Buildings adjacent to those two locations, one in TTA-1 and the other in TTA-2, were considered for sampling. However, the two adjacent buildings in TTA-1 were not suitable for indoor air sampling, one because it was open on one side and the other because of its regular use for heavy equipment maintenance, which required storage and use of solvents containing CVOCs.

Mr. Holmes stated that the QAPP identified sample locations in a few buildings near the TTA-2 location, but that site conditions had changed since the QAPP was submitted to EPA and TDEC in April 2019. The TTA-2 area is now the site of the SVE pilot test and the subsurface is under partial vacuum and is extracting a significant mass of CVOCs, which reduces the current potential for VI in that area.

Ms. Shirley asked if there was an empty warehouse on DDMT to which the VI study could be relocated. Mr. Holmes answered that there are such warehouses, but the soil vapor samples and LTM results do not indicate significant source near those buildings. Mr. Holmes added that the QAPP would have to be revised if sample locations were changed.

Mr. Holmes said that the soil vapor sample results were not consistent in some areas, and review indicated a better dataset was needed. His initial thought on the Indoor Air QAPP was to proceed with sampling in order to provide initial results as a starting point as we progress to further VI study. However, with the changed conditions due to the SVE pilot test, sampling at the locations in the QAPP is not considered to be useful.

Ms. Hutton stated she does not see the value in doing air sampling in buildings where the conditions may have improved; she is concerned that might be a waste of money. Ms. Hutton reiterated that the POP ends in 2020, and she doubts that this work can be done in time. Ms. Hutton suggested that the indoor air sampling be put on hold.

Ms. Roebuck agreed and asked, if this indoor air sampling was put on hold, would there be value in preparing a final report or would it be better to hold at this time. Mr. Holmes said that was a good question. His goal in preparing a final report was to have a single document that compiled the two VI memos (the initial screening from 2018 and the vapor sampling), the additional information in the QAPPs, and the EPA comments and responses. Mr. Holmes believes that such a document would be useful when preparing the next QAPP, but he agreed that it could wait until the next QAPP.

Ms. Hutton asked what kind of timeframe would be necessary for resolving all this and moving forward. Mr. Holmes stated that it would depend on how much information EPA would provide in comments and what specific ideas EPA has for what additional VI study is needed. Mr. Holmes believes that at least two soil vapor samples will need to be collected from each location to get a consistent data set. Mr. Holmes said that it wouldn't take long to put a QAPP together and, if that's the route taken, fieldwork could take place in approximately six months.

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Ms. Roebuck suggested that Mr. Holmes create a brief, bulleted background of the reasons to not proceed with the indoor air sampling presented in the QAPP for Ms. Lloyd's review ahead of Thursday's call. Mr. Holmes agreed that background information would be helpful and said he would work on that after the call.

Additional SRI

Mr. Holmes stated HDR is working on data reports for the vertical profiles and the Conceptual Site Model update. Mr. Holmes said the SVE pilot test is going well and the mid-point (3-month) effluent and VMP samples were collected last week. Effluent samples were collected with the dilution valve open and closed. Photoionization detector (PID) readings at the effluent samples, with and without dilution, were much lower, which indicates the sample results will show that dilution valve can be closed; that will allow more vapor to be extracted from the subsurface.

Garden Sampling

Mr. Holmes stated that the Final Garden Soil Sampling Report was submitted on 6 December. Ms. Hutton asked about the sample that exceeded the arsenic background concentration and whether the background concentrations were final. Mr. Holmes answered that the background study was completed in 1998 and incorporated in the remedial investigation report; the RI and later documents through the ROD were approved by EPA, so it should be final.

The background concentration for arsenic was 16,000 parts per billion (ppb), and the garden soil sample concentration was approximately 16,500 ppb. Mr. Holmes stated that the arsenic result is being evaluated during the risk assessment data review to evaluate whether additional background data is needed. Mr. Holmes suggested it might be appropriate for Army, when submitting the report to Barnhart Crane, to specify that the contaminant concentrations are within limits for industrial use, but that the site should not be used for gardening or other child-related activities in accordance with the LUCs.

**DUNN FIELD**

**Remedial Action**

Mr. Calhoun stated that the air sparge (AS)/SVE system is operating with the AS manifold open. The AS manifold will remain open through December 2019 then be closed through January 2020.

Mr. Calhoun stated that SVE effluent sampling and PID measurements at SVE and vapor monitoring point (VMP) locations for Year 9 Quarter 2 were completed 5 December. Preparation of the Year 9 Semi-Annual Report is underway and will be completed upon receipt and evaluation of the Year 9 Quarter 2 effluent analytical results. Mr. Calhoun noted that the Year 8 Annual Report is with the regulators, with the review period running through 17 January 2020.

Ms. Hutton stated that she has scheduled a phone conference for Mr. Foster and Buddy Wagner, real estate legal counsel at USACE Mobile, to discuss the right-of-entry (ROE) agreement for Memphis Light, Gas and Water (MLGW).. Ms. Hutton said we could be at a serious impasse if the parties cannot agree on the terms of the ROE agreement.. Mr. Calhoun asked if this could impact site access

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for normal day-to-day operations. Ms. Hutton replied that technically it could, since the current agreement expired in June 2019, though she doubts that MLGW would take such action.

**Offsite Investigation**

Mr. Holmes stated that the responses to EPA comments on the Offsite Investigation QAPP are in progress. He expects the draft responses will be submitted later this month.

Mr. Holmes said that the task order modification for the MW-87 Area Investigation is in process at USACE Mobile. Ms. Shirley asked about MW-70 and MW-71 as shown on the parcel exhibit for the ROE agreement. Mr. Holmes confirmed that the two LTM wells are present as shown. Ms. Shirley asked if the two proposed wells would be flush-mount. Mr. Holmes said that yes, flush-mounts are planned with a bollard placed next to each well to help find the wells during later sample events. Ms. Shirley also asked about the Belz agreement because the signatory was different than the point-of-contact on the recent agreement for a SRI Phase 4 well. Mr. Holmes responded that Ms. Cooper identified the listed POC on the last real estate transaction for the parcel in the Shelby County Register of Deeds.

Mr. Holmes stated that HDR is completing the city permit application for the three Offsite Investigation wells in the Right-of-Way. Ms. Cooper will contact the residents on Glory Circle about the necessary information for their access fee and will contact the property owner of the F-10 location about access.

Ms. Shirley asked if the EPA review of the QAPP was complete and when the wells could be installed. Ms. Hutton answered that EPA had sent comments and that Mr. Holmes is working on the response to those comments. Mr. Holmes said most of the ROE agreements could be completed this month, EPA approval of responses possibly in late January, and fieldwork starting in late February. Ms. Shirley expressed concern that USACE Mobile would not be able to issue the access fee check in December. Ms. Hutton said that in the future we should get the property owner's necessary information at the time of initial interaction. Mr. Holmes doubts that the owner of the F-10 location will sign an agreement; the well location could be moved, but there may not be a good alternate location.

**LONG TERM MONITORING (LTM)**

Mr. Holmes stated that HDR is working on the 2019 LTM Annual Report. Analytical results have been received for most LTM samples; three groundwater samples and one duplicate were recollected in December due to the lab not analyzing the initial samples within the required holding time despite being properly logged upon arrival with other samples.

**OTHER ISSUES**

Mr. Holmes stated that the 2020 Site Management Plan was submitted for internal review on 9 December.

Mr. Holmes said that EnviroNews, the annual newsletter, would be mailed at the end of this week.

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Mr. Holmes stated that the Information Repository disc was submitted 14 November. Ms. Cooper has contacted the TDEC office administrator to ensure the IR disc is available for TDEC to pull documents in response to community requests.

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

Ms. Hutton updated the Submittal Schedule on 6 December. Ms. Hutton stated that in future when she submits reports to the regulators for review, she will include the associated QAPP as a helpful refresher of the project plans.

Ms. Hutton said that the action items from the November call had been addressed.

Action Items

- Mr. Holmes will prepare a brief background on the VI Study for Ms. Lloyd ahead of the 12 December conference call.

Prioritized List of Documents for Regulatory Review

1. VI Indoor Air Sampling QAPP (submitted 24 April)
2. 2019 Annual Site Inspections of MI and Dunn Field (submitted 27 August)
3. Off Depot AS/SVE Annual Operations Report, Year 8 (submitted 15 November)

**Next Meeting**

The next call will be Tuesday, 14 January 2020 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#.