

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**14 January 2020**  
**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 (absent); Melissa Shirley

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

**Supplemental Remedial Investigation (SRI)/Focused Feasibility Study (FFS)**

Phase 4

Mr. Holmes stated HDR is preparing the Phase 4 report. He expects the report will be submitted for internal review in late February.

Risk Assessment

Mr. Holmes stated that HDR will be working on the Human Health and Ecological Risk Assessment (HHERA) and associated Quality Assurance Project Plan (QAPP) this month.

Vapor Intrusion (VI) Indoor Air Sampling Study

Mr. Holmes said there will be team meeting with the EPA on 12 February to discuss a new approach for the MI VI Study.

Additional SRI

Mr. Holmes said HDR is working on the draft report for the vertical profiling. The Conceptual Site Model (CSM) update was submitted to the Army on 17 December. The CSM update and vertical profiling will be included in the final SRI report.

Soil Vapor Extraction (SVE) Pilot Test

Mr. Holmes said the SVE pilot test is going well. HDR collected samples from vapor monitoring points (VMPs) and the SVE effluent in early December, after the system had been in operation for about three months. The individual chlorinated volatile organic compound (CVOC) concentrations in the effluent have reduced by approximately 75% since September when the last samples were

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collected. The samples show that the emission rate is below Shelby County Health Department (SCHD) criteria (<0.1 pounds per hour) with the dilution valve closed or open. The pilot test had been running with the valve open to maintain effluent concentrations below the SCHD criteria, but the valve was closed at the end of December based on the sample results showing the current emission rate was 0.03 pounds per hour. The concentration in the VMPs has decreased by approximately 60% at VMPs furthest from the SVE wells, and by 99.9% at the VMP adjacent to the SVE well. Through the end of December, about 128 pounds of CVOCs had been removed.

## Garden Sampling

Mr. Holmes stated that the Final Garden Soil Sampling Report was submitted on 6 December.

## **DUNN FIELD**

### **Remedial Action**

Mr. Calhoun stated that the Air Sparge (AS)/SVE system is being operated with the AS manifold closed in January. The manifold will be opened at the end of month, and system monitoring will be conducted during the first week of February. Photoionization detector (PID) measurements will be taken at SVE wells, VMPs and effluent.

Mr. Calhoun reminded the team about the lightning strike/low voltage error that had affected the system last year, necessitating replacement of all the PLC components. The damage showed up in the modem, which had to be replaced in late December. The system is running locally, but cannot be accessed remotely from a desktop control. Tristate Armature is scheduled to examine the system today. (Note: Internet connectivity was restored on 14 January.)

Mr. Calhoun stated that EPA comments were received on the Year 8 Semi-Annual Report and will be incorporated into the Year 8 Annual Report. Mr. Calhoun is starting to prepare the Year 9 Semi-Annual Report and will incorporate the comments into that report as well.

Mr. Calhoun asked if there was any update on access for the new AS wells. Ms. Hutton answered that she has not received any response from Charlotte Knight Griffin at Memphis Light, Gas and Water (MLGW). Ms. Hutton cautioned that other channels may have to be sought, for it is possible that Ms. Griffin will never sign an agreement. Ms. Hutton asked Ms. Lloyd and Mr. Woods about the implications if no access agreement is reached.

Ms. Lloyd said she would contact Ms. Griffin and then contact Ms. Griffin's boss. Ms. Lloyd clarified that EPA could not exert CERCLA authority in this case, since it is not the lead authority. But the EPA can contact MLGW and attempt to resolve concerns.

Mr. Woods asked if MLGW could be considered as standing in the way of completing this site and if that would constitute interfering with a federal investigation. Ms. Lloyd said that might be a fair point but it would be an issue for the lead authority to pursue. Ms. Lloyd wondered why the Army doesn't utilize their CERCLA authority. Ms. Hutton said she would see if Ms. Lloyd's contact with Ms. Griffin yielded results. If not, Ms. Hutton would contact the BRAC office to get the legal division involved.

Ms. Hutton noted that Ms. Griffin's two issues are the terms for indemnification and the anti-deficiency act. Previous right-of-entry (ROE) agreements did not have this language, so they were

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signed with no difficulty. Ms. Hutton stated that Buddy Wagner, general counsel at USACE Mobile, re-worded the agreement, but Ms. Griffin has not been responsive.

Ms. Hutton thanked Mr. Calhoun for keeping the system running. Mr. Calhoun acknowledged that the system wasn't designed to run this long, but that the team was keeping it operational.

**Offsite Investigation**

Mr. Holmes stated that EPA comments on the Offsite Investigation QAPP had been received in November. HDR is continuing to prepare responses to the comments.

Mr. Holmes said that the permit application had been sent to the city of Memphis for three Offsite Investigation wells in the city right-of-way (ROW). Mr. Holmes expects to have that soon. Mr. Holmes said that leaves one more offsite well near the Wabash Avenue, for which HDR is still working with the property owner, and one on Glory Circle that has not been finalized yet. Mr. Holmes noted that access for the other two wells on Glory Circle will be completed once fees for access have been paid.

Mr. Holmes stated that the MW87 area investigation should begin later this month. Ms. Hutton said USACE hopes to get the award to HDR by the end of the month. She asked what would be a general timeline for the work, once the award happens.

Mr. Holmes answered that HDR will prepare an internal work plan per the investigation activities discussed with EPA and TDEC. The work plan would be reviewed by Army and USACE, with approval expected at end of February or early March. Mr. Holmes expects that fieldwork would start around the middle of March. Fieldwork would begin with initial soil boring and groundwater samples using direct push rig. There would be 10 soil borings initially, with shallow and deeper soil samples and groundwater samples, if possible. Vapor sampling, both shallow and deep, will be performed following review of the soil sample results.

Mr. Holmes stated three monitoring wells are to be installed, one well on Dunn Field and two offsite to the west. The three wells will be sampled twice (to obtain a confirmation sample about two months after the first sample). The second sample would likely happen in July. The data will be used to evaluate human health risks through a risk assessment and a report prepared to describe the field activities, analytical results, risk assessment and further action if necessary.

**LONG TERM MONITORING (LTM)**

Mr. Holmes stated that the 2019 LTM Annual Report is being prepared and should be submitted for internal review within the week. HDR has received EPA comments on the April LTM report, and is preparing responses to those comments. Mr. Holmes reviewed the comments and does not believe any of the comments will impact the Annual Report. Mr. Holmes expects that the 2019 LTM Annual Report will be submitted for EPA and TDEC review around the first week of March.

Mr. Holmes stated that the SRI report including Phase 4 results was expected to be submitted to EPA and TDEC for review in April.

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## **OTHER ISSUES**

Mr. Holmes said that HDR had received EPA comments on 2019 LUC Inspection Report, and that HDR will soon send responses to Army and USACE for review.

Mr. Holmes stated that HDR has received comments from the internal review of the draft 2020 SMP. He expects to submit that report to EPA and TDEC within the next two weeks.

Mr. Holmes said EnviroNews, the annual newsletter, was mailed in December and has generated a few calls on the Community Information Line. One call from a neighborhood group leader requesting a meeting has been passed on to Mr. Woods. Mr. Woods confirmed that he had tried to call the number a few times; however, the number went to a voicemail that was full and he was not able to leave a message. Mr. Woods asked that Denise Cooper be informed in case that person calls the Community Information Line again. Mr. Holmes said that he had asked Ms. Cooper to return the call in order to identify his questions or concerns. At that time, Ms. Cooper provided some information and may have resolved the caller's questions.

Mr. Woods stated that he had received a call from a local consultant inquiring about development of the southeast corner of the MI. Mr. Holmes asked if that was the Alpha-Omega property used for veterans' housing. Ms. Hutton said Alpha-Omega property was a separate deed from the Edge group. Alpha-Omega has two narrow parcels on a north-south alignment. Ms. Hutton stated the property was conveyed from Army in 2001. Ms. Hutton added that she had looked at the deeds about six months ago and noticed that Alpha-Omega was leaving the CERCLA language out of the deeds; she gave BRAC a heads-up on that.

Mr. Woods said that if the consultant calls back, he'll advise the consultant to do a historic deed search looking for CERCLA language. Ms. Hutton said that if the original deed was needed, it can be found on the county website or she could send it. Mr. Holmes added that the deed might be included on the Information Repository disc.

Ms. Hutton updated the submittal schedule on 3 January. The update includes receipt of EPA comments on three documents (the April 2019 LTM Summary Report, the Off Depot AS/SVE Year 8 Semi-Annual Operations Report, and the 2019 Annual Site Inspection Report).

Ms. Hutton pointed out that this month's agenda included a list of documents requiring Army revision or response. Ms. Hutton said this should be a good point of reference for documents owed to EPA and TDEC.

Mr. Woods said that Ms. Cooper has been in contact with the TDEC lead administrator regarding the Administrative Record (AR)/Information Repository (IR) disc. Mr. Woods said that TDEC's Nashville office will take care of uploading the disc. TDEC has asked Ms. Cooper to send a letter to TDEC saying that any necessary redactions to files have already taken place, and that there is no confidential information included in the AR/IR.

Ms. Hutton stated that the Army had discussed redactions in Phase I in relation to the Allen wellfield. Ms. Hutton that there had been identifying information for well locations, and that it was decided to extract that information from any that would go into AR/IR. Ms. Hutton said that was the only thing that was ever redacted.

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Prioritized List of Documents for Regulatory Review

1. Off Depot AS/SVE Annual Operations Report, Year 8 (submitted 15 November)

Documents Requiring Army Revision or Responses to Agency Comments

1. Comments from EPA (November 2019) on Dunn Field Offsite Groundwater Investigation QAPP, Revision 0, July 2019.
2. Comments from EPA (January 2020) on 2019 Annual Site Inspection, Revision 0, August 2019.
3. Comments from EPA (January 2020) on April 2019 LTM Summary Report, Revision 0, August 2019.
4. Comments from EPA (January 2020) on Off Depot Air Sparge-Soil Vapor Extraction Year 8, 1st Semiannual Report, June 2019.
5. Human Health and Ecological Risk Assessment, Revision 0, April 2018. Revision 1 to be prepared per EPA Conditional Approval 19 April 2019 and COP Analysis approval 24 October 2019.
6. Conceptual Site Model Technical Memorandum, Revision 0, March 2018 to be revised per approved responses to USGS comments with final responses to EPA comments received June 2018.
7. Comments from EPA (March 2019) and TDEC (October 2018) on the 2018 Community Involvement Plan, Revision 0, June 2018.

**Next Meeting**

The next call will be Tuesday, 11 February 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#.