LOCATION: Conference Call

ATTENDEES:

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

CALIBRE BEC - Joan Hutton

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

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

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

HDR EOC - Tom Holmes, Clayton Mokri

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 that internal comments have been received on the Draft 2020 SRI Report. HDR has begun preparing responses to the comments.

Risk Assessment

Mr. Holmes said that HDR has completed the data review and is working on plans for sampling. Mr. Holmes stated he would prepare the document as a Sampling and Analysis Plan rather than a Quality Assurance Project Plan (QAPP).

Vapor Intrusion (VI) Indoor Air Sampling Study

Mr. Holmes stated that the task order modification for the VI task was received. HDR has begun work on the Conceptual Site Model (CSM). Mr. Holmes expects to submit the CSM for internal review this month.

Additional SRI

Mr. Holmes said that revisions to the Groundwater Model/CSM technical memorandum and to responses to EPA comments on the memorandum were submitted to EPA in July.

Mr. Holmes said the final Soil Vapor Extraction (SVE) pilot test report was submitted to the Army on 5 August. The report will be included in the SRI Rev0 report to be sent EPA and TDEC for review.

Feasibility Study (FS)

Mr. Holmes stated the Remedial Action Objectives (RAOs) are being prepared consistent with the MI Record of Decision (ROD). Mr. Holmes believes the FS will be ready for internal review in approximately two months.

Ms. Hutton asked Mr. Woods for his thoughts about the offsite plumes. She said there are good data to show that the plume of chlorinated solvents on the northeast quadrant of the MI is, at least in part, from an offsite source. Data also show that the plume on the southwest corner of the MI is similarly from an offsite source.

Mr. Woods agreed that there are offsite sources. He noted that active remediation is not always required. He is working on another NPL site in the Memphis area where EPA is the lead agency and the remedy is land use restrictions with future owners required to mitigate for vapor intrusion. Mr. Woods wondered whether use of SVE would influence the plume.

Ms. Hutton stated that she is concerned about consistency in remedial action, now with these two plumes and the offsite plume on Dunn Field. She noted the existing groundwater use restrictions.

Mr. Holmes said that the offsite well to the northeast (MW-310) is on a parcel belonging to Kellogg and is next to an MLGW substation. The TCE concentration at MW-130 is higher than in the onsite downgradient wells in the North-Central plume, until MW-258, which is approximately 1,500 feet southwest of the northern MI boundary. He noted that PCE concentrations at MW-258 may indicate an onsite source near there.

Mr. Woods speculated that if a SVE was used on the MI, the addition of air sparge (AS) wells could reduce plume concentrations as it comes onsite. Ms. Hutton questioned what would be the endpoint for remediation. She doubted that the Army would agree to perpetual remediation for cleanup of an offsite plume.

Mr. Calhoun added that compound-specific isotopic analysis can differentiate isotopes of the same chlorinated volatile organic compound (CVOC). The analysis might be able to "fingerprint" the contamination based on manufacturer. Mr. Calhoun has seen this used on Maxwell Air Force Base. Mr. Holmes responded that the molar fractions have been analyzed, but not isotopes. Mr. Calhoun offered to check his files for the associated lab report and forward it to Ms. Hutton and Mr. Holmes.

DUNN FIELD

Remedial Action

Status of AS/SVE Operations

Mr. Calhoun said that Year 10 has officially begun, and the manifold was opened on 4 August. Initial Year 10 monitoring with PID and pressure measurements will be conducted the week of 24 August, after which the AS manifold will be closed per the operating schedule.

AS Well Installation Access

Mr. Calhoun stated staff and the drilling contractor would travel to the site on 8 September, the day after Labor Day, for installation of the additional AS wells.

AS/SVE Reporting

Mr. Calhoun said that the Year 8 Annual Report is with the EPA for concurrence based on revisions submitted 26 June. The Year 9 Semiannual Report is also with the regulators for review (submitted 24 April). The Year 9 monitoring results are complete, and preparation of the Year 9 Operations Report has begun.

Mr. Woods asked Mr. Holmes and Mr. Calhoun about the permit process for installation of injection wells, specifically if they were required to go before the board for approval. Mr. Holmes answered that had not been required for the EBT injection wells in 2006 nor for the air injection (AS) wells in 2009.

OFFSITE INVESTIGATION

Offsite Investigation

Mr. Holmes said that HDR installed, developed, and sampled the offsite wells in the first half of June. The internal draft report was submitted 30 July. Mr. Holmes referenced the three attached figures, which were emailed with the agenda for this call; the figures show tetrachloroethene (PCE), trichloroethene (TCE), and 1,1-dichloroethene (DCE) concentrations in the offsite area. The figures present the initial sample results for the new wells; quarterly sampling of the new wells and the TDEC wells will begin in October 2020.

Mr. Woods mentioned that Hayes Road was shifted approximately 10 to 15 years ago. He suggested that there may be an easement wherein work could be performed, between the current road and the houses. Mr. Holmes confirmed that was the case and that MW-322 was within the easement

Mr. Woods also noted he was on-site when TDEC well CS-07, located due east of OSI well MW-322, was installed; brick and ash were encountered at 5 to 10 feet below the current

grade and a handful of spent lead bullets were identified in the soil core. This made him wonder if the area was an old disposal site. Ms. Hutton suggested that property records could be checked to identify when the residences were built. Mr. Woods estimated that the houses were built in the 1950s, based on the style.

MW-87 Area Investigation

Mr. Holmes referenced the attached figure showing analytical results for the MW-87 area investigation was also emailed with the agenda for this call. The figure shows CVOC concentrations above criteria in the Dunn Field ROD for soil, soil vapor and groundwater. He pointed out the locations of Phase 1 and 2 soil borings, groundwater grab samples and vapor monitoring points.

Mr. Holmes stated the only vapor samples with TCE and chloroform (CF) above criteria were at VP-7A/B, which were installed for the Dunn Field SVE system. Based on those results, the elevated TCE and CF concentrations observed in MW-87 are from residual contamination in the former remediation area.

Mr. Holmes also stated soil samples at SB-06 and SB-07 had high concentrations of 1,1,2,2 Tetrachloroethane (TeCA) above the criteria. A recent groundwater sample from MW-06 had a high concentration of TeCA, which may result from soil contamination; the contamination may be due to past activities in the currently wooded area near SB-06 and SB-07.

Mr. Holmes noted two monitoring wells are to be installed along the western fence line at the end of this month: one well downgradient of MW-06, and the other downgradient of MW-87.

LONG TERM MONITORING (LTM)

Mr. Holmes stated that HDR is waiting on EPA comments for the 2019 LTM Annual Report.

Mr. Holmes said the lab reports for the final samples collected in July have been received and incorporated into the May 2020 LTM sampling report. Mr. Holmes expects to submit that report for internal review in the next week or so.

OTHER ISSUES

Mr. Holmes made the following statements on other issues:

- The annual Land Use Control (LUC) Site Inspection draft report was submitted for internal review on 21 July.
- Preparation of the 2021 Site Management Plan will begin in September.
- There were no calls on the Community Information Line in the last month.

Ms. Hutton stated the document submittal schedule was submitted with the agenda. The schedule was last updated on 2 July; there have been no changes to the schedule since then.

Upcoming Fieldwork

Contractor	Activity	Dates
Trinity	AS/SVE monitoring	25 August
Trinity	AS well/line installation and miscellaneous repairs.	8-12 September
HDR	MW-87 Area well installation	26-29 August
HDR	1st Quarter sampling of OSI and TDEC wells and semiannual LTM sampling	7-16 October

Prioritized List of Documents for Regulatory Review

- 1. 2020 Site Management Plan, Rev0 (submitted 21 January 2020). EPA comments received 11 May 2020. Responses to comments submitted 18 June.
- 2. Off Depot AS/SVE Annual Operations Report, Year 8 (submitted 15 November 2019). EPA comments received 14 May 2020. Responses submitted 26 June.
- 3. 2019 LTM Annual Report (submitted 23 March 2020).
- Groundwater Modeling Conceptual Site Model Technical Memorandum, Revision 0, March 2018. Revised responses to EPA comments on Revision 0 and Groundwater Modeling CSM TM, Revision 1 submitted to EPA 2 July 2020.

<u>Documents Requiring Army Revision or Responses to Agency Comments</u>

Comments from EPA (March 2019) and TDEC (October 2018) on the 2018
 Community Involvement Plan, Revision 0, June 2018. (HDR to provide responses to EPA and TDEC comments)

Next Meeting

The next call will be Tuesday, 8 September at 10:30 AM EDT, 9:30 AM CDT, and 8:30 AM MDT. The dial-in number will be 800-207-9558, with access code 2049034#.







