

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**8 SEPTEMBER 2020**  
**10:30 EDT**

**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

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 (FS)**

Phase 4

Mr. Holmes noted the internal draft 2020 SRI report was submitted in April 2020. Responses to internal comments are being reviewed and are expected to be resolved soon. The 2020 SRI report will then be revised and submitted to EPA and TDEC.

Risk Assessment

Mr. Holmes said that the data review has been completed, and the draft sampling plan is being prepared. He noted that preparation of the sampling plan has been delayed by other site activities.

Vapor Intrusion (VI) Study

Mr. Holmes stated that HDR is continuing with the VI Conceptual Site Model (CSM). Historical data have been identified and HDR has prepared maps with historical maximum concentrations of the original contaminants (tetrachloroethene [PCE], trichloroethene [TCE], carbon tetrachloride [CT], and chloroform [CF]) and the most recent data as of May 2020 (which includes the original contaminants and vinyl chloride [VC]). HDR needs to complete review of the building plans and utility corridor information in order to finalize the CSM.

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Additional SRI

Mr. Holmes said that the Final Soil Vapor Extraction (SVE) Pilot Test report was submitted to Army in August. The report will be an appendix in the 2020 SRI report.

Mr. Holmes stated that EPA's comments for the revised Groundwater Model CSM Memorandum were received 7 September. Mr. Holmes noted that those comments will close out this initial activity. He then asked Ms. Lloyd if she wished to expand further on her comments about modeling.

Ms. Lloyd stated that she would like to see some groundwater modeling based on the data from the SRI when it's completed. The modeling would help to estimate the time required for different remedies to achieve remedial action objectives (RAOs); the length of time is an important factor for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) actions.

Ms. Hutton stated that at the present time, additional modeling is not funded. There isn't budget remaining in the current contract for this, and a new contract would be required. Ms. Hutton said that this additional effort will be considered as other task orders are completed. Ms. Shirley said that she would have to check if funds on other task orders could be used for this, but she said that the one of the HDR task orders could likely be modified if Base Realignment and Closure (BRAC) has additional funds in fiscal year 2021.

Mr. Holmes stated that additional data would be required from Memphis Light, Gas and Water (MLGW) to proceed. The lack of that data was a main reason in not going further with the models. Ms. Lloyd suggested that EPA, perhaps in conjunction with Army and TDEC, could renew the effort to acquire the data by requests directly to the president of MLGW. Ms. Hutton agreed that a lot of time has been spent in the attempt to get the information, so it would be helpful to have EPA and TDEC lead on this. Mr. Holmes said that it would be good to discuss this internally and then get back to Ms. Lloyd and Mr. Woods.

Feasibility Study

Mr. Holmes said that HDR is currently reviewing existing documents and SRI and LTM data collected through May 2020. Contaminant extent, volumes, and area of groundwater contamination in the different plumes are being identified. Currently, HDR is looking at remedial action where volatile organic compound (VOC) concentrations are greater than 50 parts per billion (ppb). Key points will be provided to Army and USACE as the FS proceeds and will be shared with EPA and TDEC on these monthly calls. One issue to be considered at a few areas of the MI is contaminant migration from offsite sources, including at a recent SRI well installed offsite of the northeast section of the Main Installation.

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Ms. Lloyd said she believes a CSM will be required when the SRI is wrapped up, in order to show that future actions will meet RAOs. Mr. Holmes replied that a CSM is being prepared for VI. He added that Ms. Lloyd's letter from 7 September dealt with a CSM that was developed to guide groundwater modeling; the modeling was intended to evaluate the extent of contaminant migration into the Memphis aquifer, the travel time required to reach the Allen Well Field and the expected concentrations. Mr. Holmes noted there is a lot of data concerning the extent of contamination in the fluvial aquifer, and although the data for deeper aquifers is not as extensive, it does not indicate high VOC concentrations in the Intermediate and Memphis Aquifers. Mr. Holmes thinks there is sufficient data on the site to support the FS addressing the groundwater remedy. The potential sources for VI are the groundwater plumes and residual contamination in the shallow fine-grained soil; the VI CSM is meant to address those issues.

Ms. Lloyd agreed that there is a lot of data and stated that when the SRI is finished, all the data should be brought together in a single CSM for the entire MI, encompassing all aquifers and ongoing issues. Mr. Holmes said that further discussions with Army and USACE will be needed to proceed on that issue.

## **DUNN FIELD**

### **Remedial Action**

#### Status of Air Sparge (AS)/ Soil Vapor Extraction (SVE) Operations

Mr. Calhoun stated that September is an 'off' month for the AS/SVE system, and the AS manifold was closed 24 August.

#### AS Well Installation

Mr. Calhoun said that installation of five new AS points and the AS lines to connect them to the AS manifold will begin this week. In addition, repairs will be made for AS points 3, 55 and 57 to correct the damage noted in July.

#### AS/SVE O&M Reporting

Mr. Calhoun stated that the Year 8 Annual report was approved. The Year 9 Annual report is being prepared and is expected to be submitted for internal review at the end of the month.

Ms. Hutton asked if there would be an optimization report summarizing the new AS points after installation is complete. Mr. Calhoun confirmed that there would be. He added that the 2016 Uniform Federal Policy – Quality Assurance Project Plan (UFP-QAPP) for the new AS points had been updated for personnel and contractors; no technical changes were made.

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**Offsite Investigations**

Offsite Investigation

Mr. Holmes stated that results from the offsite wells were discussed on last month's call. That well installation and sampling report was submitted for internal review in July. Internal comments have been resolved and he expects to submit the revised report within the next week.

MW-87 Area Investigation

Mr. Holmes said that a well downgradient of MW-06 was installed and sampled in August; the analytical results are due in the next week. A well downgradient of MW87 is planned; however, access is limited due to a power line directly above the fence/property line and an access agreement for the adjacent property has not progressed.

MW-87 is much closer to the fence and the power line than MW-06. A well location at a sufficient distance from the power line (20 feet) would be too close to MW-87 for the analytical results to be useful. HDR has requested cost estimates from MLGW for temporary relocation of the power line and from contractors to clear the vegetation and temporarily remove the fence.

**LONG TERM MONITORING**

Mr. Holmes said that the 2019 LTM Annual report is still in review by EPA. The May 2020 LTM Summary report was submitted for internal review on 17 August.

**OTHER ISSUES**

Mr. Holmes stated that the 2020 Annual Site Inspection was submitted to EPA and TDEC for review in August.

Mr. Holmes said that EPA approval has been received for responses to comments on the 2020 Site Management Plan. HDR will incorporate the approved responses and submit Revision 1. HDR will also begin review for the 2021 Site Management Plan this month.

Mr. Holmes stated that HDR will begin work on EnviroNews, the annual newsletter. The story list and schedule will be submitted for internal review this month.

Mr. Holmes said there were no calls on the Community Information Line this past month.

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Mr. Holmes stated that HDR is continuing work on draft responses to EPA and TDEC comments for the 2018 Community Involvement Plan (CIP). Ms. Hutton asked when the contract expires for the CIP. Mr. Holmes answered that the contract expires at the end of December 2020 and noted that the SRI is on that same contract.

Ms. Hutton stated she updated the submittal schedule on 7 September to reflect EPA's approval of the Off-Depot SVE Year 8 report and the 2020 Site Management Plan. Ms. Hutton also noted EPA's letter regarding the groundwater CSM.

**Upcoming Fieldwork**

The schedule for upcoming work was discussed; the dates are listed below. Mr. Holmes stated that fieldwork for additional well installation in the MW-87 area has not been scheduled yet.

Contractor	Activity	Dates
Trinity	AS well/line installation and repairs.	8-18 September
Trinity	AS/SVE monitoring	6 October
HDR	1 <sup>st</sup> Quarter sampling of OSI and TDEC wells and semiannual LTM sampling	7-16 October

Ms. Lloyd asked the team to consider that if groundwater modeling is not used, how will the cleanup timeframe question be addressed? She clarified that she was not asking to add pressure but to note this as something to consider.

**Prioritized List of Documents for Regulatory Review**

1. 2019 LTM Annual Report (submitted 23 March 2020).
2. 2020 Annual Site Inspection (submitted 17 August 2020).

**Documents Requiring Army Revision or Responses to Agency Comments**

1. Comments from EPA (March 2019) and TDEC (October 2018) on the 2018 Community Involvement Plan, Revision 0, June 2018. (In progress)

**Next Meeting**

The next call will be Tuesday, 13 October 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#.