

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**13 APRIL 2021**  
**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, Laura Roebuck (absent), Melissa Shirley (absent)  
TDEC Division of Remediation, DDMT Project Manager – Jamie Woods  
U.S. EPA, Region 4, DDMT Project Manager – Diedre Lloyd  
HDR EOC – Tom Holmes, Clay Mokri, Nancy Jepsen  
Koman Government Solutions / Trinity – Larry Pannell

**GENERAL**

**MAIN INSTALLATION**

**Remedial Action** - No current remedial action

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

FFS

Mr. Holmes began the meeting with a discussion of the FFS. Review materials for the discussion were provided to the project team by Ms. Hutton on 12 April and were shared on the call by Mr. Holmes via WebEx. Mr. Holmes stated the FFS had been put on hold in December while the 2020 Supplemental Remedial Investigation (SRI) Report was in agency review and to include results from additional sampling and risk assessment and vapor intrusion (VI) studies. He noted the sampling and analysis plan (SAP) for additional sampling and risk assessment is being prepared and that the VI sampling plan is on hold while the Conceptual Site Model (CSM) is reviewed.

Mr. Holmes stated that the sampling results from October 2020 show concentrations of tetrachloroethene (PCE) and trichloroethene (TCE) exceed maximum contaminant levels (MCLs) at several wells installed in the Intermediate Aquifer (IAQ) and the Memphis Aquifer (MAQ) and located in the northwest section of the Main Installation (MI). A map showing the well locations and the trend plots of the PCE and TCE concentrations at each well were provided in the review materials and were reviewed during the call. Most of the wells show increasing trends.

Mr. Holmes stated the contamination in these IAQ and MAQ wells is considered to be due to plume migration into the window from the Fluvial Deposit Aquifer (FDAQ), possibly from contamination around Building 720. Mr. Holmes noted that the PCE

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and TCE results are consistent with the 2009 model and are not expected to be a problem for groundwater extraction at the Allen Wellfield. However, since PCE exceeds the MCL in an MAQ well (MW-254) near the property boundary and in an offsite IAQ well (MW-309), the FFS should proceed to avoid additional delay. Once the FFS has been completed, additional steps are required before remedial action can begin: approval of the recommended remedy, decision document, remedial design and construction

Mr. Holmes stated that there have been good results from soil vapor extraction (SVE) pilot tests as shown by trend plots for two FDAQ wells in that area. Mr. Holmes noted that review of alternate remedies has not been completed, but any chosen remedy should match or exceed the SVE results. Mr. Holmes stated that reduction of chlorinated volatile organic compound (CVOC) concentrations in the FDAQ would reduce contamination migrating to the deeper aquifers and would decrease the potential VI risk.

Mr. Holmes stated that the additional sampling and risk assessment SAP addresses soil and sediment contaminants that do not include volatile organic compounds (VOCs) and, thus, is not related to the groundwater contamination.

Mr. Holmes estimated it would take a month or more to complete the FFS report, which would then go to Army for review, followed by review from EPA and TDEC.

Ms. Lloyd asked for clarification about the soil contamination not being related to the groundwater. Mr. Holmes answered that the soil and sediment sampling SAP is being prepared to address EPA comments on the Human Health and Ecological Risk Assessment (HHERA). Those comments did not address VOCs or the groundwater remedy but were related to other compounds (such as dioxins, arsenic, and chromium) and the potential for ecological risk.

In addition, previous soil sampling for the 2000 remedial investigation and for an investigation of the plume source areas in 2009 did not identify areas with VOC contamination in soil that warranted remedial action. However, the estimated mass of VOCs removed during the SVE pilot test in the TTA-2 area indicated a significant source area in soil may be present, perhaps under a building where sampling had not been performed.

Ms. Lloyd asked about the timing for completion of the plan for additional sampling and risk assessment. Mr. Holmes expects to have a document for Army review in about a month, followed by regulatory review a month later. Mr. Holmes acknowledged that the soil/sediment sample results and risk assessment, the VI study, and the FFS need to be consolidated into one document at some point in the future, but action could be taken on the groundwater remedy at the same time that work proceeds in the other areas. Mr.

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Holmes noted again that reduction in groundwater VOC contamination would positively impact VI.

SRI

Mr. Holmes noted that EPA is reviewing the responses to comments on the 2020 SRI Report, Rev0.

Risk Assessment

Mr. Holmes repeated that the sampling plan is in progress.

VI Study

Mr. Holmes said TDEC approval has been received for the VI CSM and that the CSM is still in review by EPA.

SVE Pilot Test Extension

Mr. Holmes stated the SVE equipment will be tested, reconnected to the SVE well, and operation re-started next week upon completion of the LTMOSI sampling. The test will run for another six months.

**DUNN FIELD**

**Remedial Action**

Status of Air Sparge (AS)/SVE Operations

Mr. Pannell said that repairs were made to the system in March. The AWS pump and the associated flow meter were replaced. A wiring issue was identified due to the vent motors being directly wired to the terminals on the blowers. This was not within code and has been corrected.

Mr. Pannell stated that Blower 1 is still not functioning. An electrician has inspected the blower and believes that a bad winding is the cause. The blower will be removed next week and shipped offsite for repair.

Mr. Pannell said that the AS/SVE system was scheduled to be off during March. However, due to lost time in February, the manifold was open from 19 March through 24 March. The system is operating now and will continue operating in April.

Mr. Pannell stated that semiannual preventative maintenance was performed on the blower and compressor at the end of March. Mr. Pannell also stated that AS-55 was damaged by a vehicle and that a quote for repair has been requested.

Mr. Pannell said that quarterly monitoring is being conducted today and tomorrow.

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AS/SVE O&M Reporting

Mr. Pannell said that the Year 10 Semi-Annual Report will be sent for Army and USACE review this week. The report is scheduled for regulatory review in June.

Ms. Lloyd stated she expects to send comments on the Year 9 Annual Report this week.

**Offsite Investigations**

Offsite Groundwater Investigation (OSI)

Mr. Holmes stated that the third quarter sampling will begin this week. He said that one more sampling event will happen in July, after which a final report will be prepared.

MW-87 Area Investigation

Mr. Holmes stated that the MW-87 Area Investigation Report with the Human Health Risk Assessment was submitted to EPA and TDEC on 26 February. Mr. Holmes said further work is currently on hold. Soil contamination was found in two borings as wells as recent variations in groundwater concentrations at MW-87 and MW-06. Mr. Holmes noted the Army and USACE are working on a modification for additional soil sampling and vapor monitoring points and installation of a monitoring well. Upon completion of sampling and risk assessment, an addendum to the MW-87 area report will be prepared.

Ms. Lloyd asked if soil contamination is found, will a hotspot removal action be considered? She said that such a solution could happen quickly. Mr. Holmes answered that for now the focus is on identifying the limits of the contamination; a hotspot removal action would be considered depending on the extent of contamination.

**LONG TERM MONITORING**

Mr. Holmes stated that semiannual sampling is being conducted over the next 10 days. Mr. Holmes said work is proceeding on the 2020 Annual Report, with additional internal comments due. The report will be submitted for regulatory review at the end of April or the beginning of May.

**OTHER ISSUES**

Mr. Holmes stated the 2020 Annual Land Use Controls Site Inspection and the 2021 Site Management Plan require a reply on the responses to EPA comments.

Mr. Holmes said that there were no calls on the Community Information Line in March.

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Ms. Hutton emailed the updated Submittal Schedule with the agenda for this meeting. TDEC submitted approval of the Dunn Field Year 9 Annual Report this morning.

Ms. Lloyd asked, if the FFS were to proceed, how would the FFS be captured in a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) decision document, for instance would it be an interim action or a remedial action? She believes a Record of Decision (ROD) Amendment should be delayed until it can incorporate actions for VI and soil sediment as needed. An interim remedial action or explanation of significant differences may be more appropriate for changes to the groundwater remedy.

Ms. Lloyd asked if the Site Management Plan had been finalized. Mr. Holmes said that EPA comments were still required and suggested that EPA could include comments regarding the appropriate decision document.

Upcoming Fieldwork

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Y10 Monitoring, Q3 Sample	13 April 2021
HDR	April 2021 LTM and OSI Q3 Sample Event	14-23 April 2021
HDR	SVE Pilot Test Extension Startup	19 April 2021

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Responses to EPA comments on Offsite Groundwater Investigation Well Installation and Sampling Report (submitted 21 December 2020)
2. Responses to EPA Comments on 2020 Annual Site Inspection Report (submitted 2 February 2021)
3. Responses to EPA Comments on 2020 Supplemental Remedial Investigation Report, September 2020 (submitted 16 February 2021)
4. Responses to EPA Comments from EPA on May 2020 LTM Summary Report, October 2020 (submitted 2 March 2021)

Reports

1. Off Depot Air Sparge/Soil Vapor Extraction System Annual Operations Report, Year Nine (submitted 21 December 2020)
2. Vapor Intrusion Conceptual Site Model (submitted 30 December 2020)
3. 2021 Site Management Plan (submitted 22 February 2020)
4. MW-87 Area Investigation Report-HHRA (submitted 26 February)

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**Next Meeting**

The next call will be Tuesday, 11 May at 10:30 AM EDT and 9:30 AM CDT. The dial-in number will be 800-207-9558, with access code 2049034#.