

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
8 JUNE 2021
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, Laura Roebuck, Melissa Shirley

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

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

HDR EOC – Tom Holmes, 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)

Mr. Holmes stated HDR is waiting for EPA approval of the response to comments in order to finalize the SRI report and that HDR is continuing to work on the FFS.

Mr. Holmes stated the Risk Assessment Sampling and Analysis Plan was submitted for internal review on 2 June.

Mr. Holmes noted HDR is waiting for EPA comments on the Vapor Intrusion Conceptual Site Model submitted 30 December 2020.

Mr. Holmes reported the Soil Vapor Extraction (SVE) Pilot Test was re-started in April and will continue into October; there were no issues in May. An emissions report for the initial effluent samples in April was submitted to Shelby County Health Department (SCHD) in May. SCHD confirmed receipt and stated no further information was required at present. Mr. Holmes noted VOC discharges in the effluent were below the de minimus criteria of 0.1 pound per hour. The final vapor monitoring point (VMP) sample analytical results were received on 25 May; HDR will provide a summary of the results to the Army.

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DUNN FIELD

Remedial Action

Status of Air Sparge (AS)/SVE Operations

Mr. Pannell said the AS manifold was open during May. The compressor was down from 6 May to 11 May due to thunderstorms in the area and was re-started on 11 May.

Mr. Pannell stated AS-55 repairs were completed 12 May and the well is now operating. The AS well had been damaged when a vehicle drove over it.

Mr. Pannell noted Blower 1 was reinstalled on 17 May and is back online, and that fourth quarter vapor effluent monitoring was completed on 7 June.

AS/SVE O&M Reporting

Mr. Pannell said EPA's comments for the Year 9 Annual Report were received; responses will be submitted for internal review this week.

Mr. Pannell stated the Year 10 Semi-Annual Report has completed internal review and will soon be submitted for agency review.

Offsite Investigations

Offsite Groundwater Investigation (OSI)

Mr. Holmes said a brief data report on third quarter sampling in April was submitted for internal review. The results were similar to earlier results. The final quarterly samples will be collected in July, after which the final report will be prepared. He noted that samples from several wells were collected using the passive diffusion bag (PDB) installed after the previous sample event and from low-flow sampling with a bladder pump.

Mr. Woods asked if sampling from PDBs and bladder pumps was for evaluation or confirmation of previous results. Mr. Holmes said additional samples had been collected to confirm higher concentrations at MW-322 just outside the Dunn Field boundary. There were reduced concentrations in some wells, such as MW-130, and differences in concentrations in the low-flow and PDB samples at other wells. The results from the two sample types have been similar in most cases, but PDB samples tend to have lower concentrations.

MW-87 Area Investigation

Mr. Holmes stated an addendum to the Work Plan was prepared to summarize additional sampling. Field work this week will include soil samples from ten soil borings and groundwater sampling from a new upgradient monitoring well. Mr. Holmes said that

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additional VMPs will be considered based on the soil sample results. Vegetation was cleared yesterday (7 June), surface debris will be cleared today, and soil sampling is scheduled to begin tomorrow; the upgradient well in the MW-87 area will be installed later this week.

LONG TERM MONITORING

Mr. Holmes said a summary report for the April 2021 sampling event is being prepared; agency comments for the 2020 Annual LTM Report Rev0 have not been received.

Mr. Holmes stated MW-97 will be replaced during the current field event. The existing damaged well will be abandoned by over-drilling and grouting, and an adjacent well will be installed, developed, and sampled.

Mr. Holmes noted that a damaged cover for an injection well vault in TTA-1 (southwest MI) would also be repaired during the current field event. The damage was caused by heavy equipment driven over the vault.

OTHER ISSUES

Ms. Hutton said that Leidos will perform a preliminary assessment for use of per- and polyfluoroalkyl substances (PFAS) at DDMT, which will include a site visit at the end of August. Any inquiry regarding PFAS at DDMT should be referred to her, and she will forward the inquiry to the Army legal department. Ms. Hutton noted HDR will provide data and assistance to Leidos, as needed. To that end, HDR submitted the Administrative Record to Leidos last week. She stated Leidos intends to assemble as much information as possible ahead of the site visit and use the site visit to close data gaps. Mr. Woods asked if Leidos would conduct sampling during the visit. Ms. Hutton responded that the site visit will be a preliminary assessment only and the visit will consist of seeing the property, interviewing owners and tenants, and assessing the local area for other PFAS sources.

Mr. Holmes stated that the 2020 Annual Land Use Controls (LUC) Site Inspection needs to be finalized before the 2021 LUC inspection begins in July.

Mr. Holmes said EPA comments for the 2021 Site Management Plan have not been received.

Mr. Holmes stated that there were no calls on the Community Information Line during May. Mr. Woods said he received a voicemail complaint about an excavation at the Barnhart Crane property. Mr. Holmes said he would ask Clayton Mokri or Denise Cooper to review this. Ms. Hutton said she would email Greg Ward to inform him of the complaint and to verify that land use restrictions are followed. (Note: No excavations

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were observed during a drive-by inspection of the MI perimeter. The caller may have mistaken the piles of vegetation from clearing the MW-87 area for an excavation.)

Ms. Hutton sent the updated submittal schedule with the agenda for this meeting. Ms. Hutton said that the only new item on the schedule is the submission of the 2020 Administrative Record compilation discs and the 2021 Information Repository update disc. Mr. Woods confirmed that his office received the discs.

Ms. Hutton stated that she has been considering the upcoming risk assessment and vapor intrusion work, specifically the complexity and interrelatedness of the tasks. Ms. Hutton said she does not want to repeat fieldwork or other activities due to not receiving review comments in time and would like to follow the document review periods established in the Federal Facilities Agreement (FFA). That will give a 60-day review period for primary and secondary documents, with an exception for the Site Management Plan; a 20-day extension can also be requested. Mr. Woods said that he would contact Ms. Lloyd with an offer to coordinate their reviews more closely if that would help.

Mr. Holmes said that the FFA does not establish a time period for reviewing responses to comments. Mr. Holmes noted that four documents currently on the prioritized list of documents are waiting for approval of the responses to comments. Mr. Woods noted other sites under his review allow 30 days for resolution of comments.

Ms. Hutton said that the FFA states that regulatory review of secondary documents is optional, though she noted that Mr. Woods and Ms. Lloyd prefer to review the secondary documents.

Upcoming Fieldwork

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Monitoring with Q4 sample	7 June 2021
HDR	MW-87 Area Soil Sampling and Well Installation and Sampling	7 to 15 June 2021
HDR	2021 Annual Site Inspection - LUC	July 2021
HDR	OSI Q4 Sample Event	July 2021
HDR	SVE Pilot Test Extension Vapor Sampling	July 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)

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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. Vapor Intrusion Conceptual Site Model (submitted 30 December 2020)
2. 2021 Site Management Plan (submitted 22 February 2021)
3. Annual Long-Term Monitoring Report – 2020 (submitted 4 May 2021)

Documents Requiring Army Revision or Responses to Agency Comments

1. Comments from EPA (3 June 2021) on MW-87 Area Investigation Report-HHRA, February 2021.
2. Comments from EPA (3 June 2021) on Off Depot Air Sparge/Soil Vapor Extraction System Annual Operations Report, Year Nine, December 2020.

Next Meeting

The next call will be Tuesday, 13 July at 10:30 AM EDT and 9:30 AM CDT. The dial-in number will be 800-207-9558, with access code 2049034#.