

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 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 – Melissa Shirley (absent); Bob Beacham, Laura Roebuck,

TDEC Division of Remediation, DDMT Project Manager – Jamie Woods

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

HDR EOC – Tom Holmes, Clayton Mokri, Nancy Jepsen

Koman Government Solutions / Trinity – Larry Pannell

**GENERAL**

**MAIN INSTALLATION (MI)**

**Remedial Action** - No current remedial action

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

Mr. Holmes stated that the SRI, Rev1 was submitted 29 July. Conditional approval from the EPA was received 2 August.

Mr. Holmes said that the FFS is moving forward. Progress was limited in July due to the engineer's workload but will pick up later this month. Mr. Holmes expects to submit the draft FFS in early October.

Mr. Holmes stated that the Human Health and Ecological Risk Assessment (HHERA) Review Sampling and Analysis Plan (SAP), Rev0 was submitted 29 July. Mr. Holmes asked if Mr. Woods had received the submitted CD; Mr. Woods said he thought he had but would confirm. Mr. Holmes noted the review period ends 29 September.

Mr. Holmes said the Vapor Intrusion (VI) Study Conceptual Site Model (CSM) was submitted in January, and the task order was closed in July. EPA comments were received on 2 August. Mr. Holmes said responses to comments would be prepared, but remaining work would be conducted under a new task order awarded this week.

Mr. Holmes stated the Soil Vapor Extraction (SVE) Pilot Test is continuing; three months of operation were completed in July. HDR collected vacuum and photoionization detector (PID) measurements at vapor monitoring points (VMPs) and effluent vapor samples. Mr. Holmes reported the effluent sample concentrations were similar to those from April 2021. Mr. Holmes noted samples will be collected again in October, and the pilot test will be shut down.

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 2021**  
**10:30 EDT**

**DUNN FIELD**

**Remedial Action**

Status of Air Sparge (AS)/SVE Operations

Mr. Pannell said the AS manifold was opened on 29 June, closed on 13 July, and re-opened on 27 July prior to the August monitoring event. He noted the reason for opening and closing the manifold was that the system had been off earlier in June and they were trying to increase total operating hours to be consistent with the planned schedule. Mr. Pannell said the system is on schedule now and the manifold will be open for the month of August.

Mr. Pannell said no significant repairs were required in July. He had previously identified a few minor items, such as replacing the air conditioner for the computer room and repairing sagging connections for effluent piping from the two blowers. Those items were taken care of in early August.

AS/SVE O&M Reporting

Mr. Pannell stated that the end of July marked the end of Year 10 operations and Year 11 began in August. The Year 10 Annual Report is being prepared.

**Offsite Investigations**

Offsite Groundwater Investigation (OSI)

Mr. Holmes said that the fourth quarter sampling for the OSI was completed in July. Results were received in early August and the report is being prepared. Mr. Holmes stated that HDR received repeat comments from the EPA on the Well Installation and Sampling Report that had been submitted in October 2020. Those comments were followed by a No Concurrence letter on 4 August.

Mr. Woods asked if this was regarding the northeast plume coming on to Dunn Field. Mr. Holmes affirmed that it was and said that the EPA did not agree with the conclusion of an offsite source based on only the first sample results.

Mr. Woods asked if the plume would be handled through land use restrictions. Mr. Holmes replied that was the plan. He said that Army does not think the plume warrants active remediation given the low concentrations and that the plume does not extend beyond the low in groundwater elevations west of Dunn Field where the flow direction turns to the north.

MW-87 Area Investigation

Mr. Holmes said HDR submitted a data report and Human Health Risk Assessment (HHRA) Update in July based on soil and groundwater samples collected in June. Mr. Holmes said locations were selected for additional soil borings and VMPs. However, vapor samples could not be collected from all the VMPs because of saturated screens due to rain during the July sampling event. Mr. Holmes said the team attempted to collect samples in August, but only one

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 2021**  
**10:30 EDT**

additional sample was collected. Mr. Holmes said that repeat samples were collected at other VMPs in August.

Mr. Holmes noted that EPA conditional approval of the MW-87 Area Investigation Report, submitted in February 2021, was received on 3 August.

**LONG TERM MONITORING (LTM)**

Mr. Holmes said an additional set of comments was received from the EPA on the May 2020 LTM report in June. On 2 August, conditional approval from EPA was received, but it wasn't clear if the conditional approval was for the May 2020 LTM report or the 2020 Annual LTM report.

Mr. Woods asked if he needed to send an approval of the May 2020 LTM report. Mr. Holmes said that was not necessary as the semiannual report was incorporated in the 2020 Annual LTM report. He noted TDEC approval of the 2020 report was received 10 August.

Mr. Holmes said the April 2021 LTM report is in internal review.

**OTHER ISSUES**

New Contract

Ms. Hutton asked Mr. Holmes to give a summary of the new contract awarded to HDR. Mr. Holmes replied the new task order includes two tasks: implementation of the HHERA Review SAP (July 2021) submitted to EPA and TDEC and further VI Study as outlined in the VI CSM (December 2020). Mr. Holmes noted the SAP was prepared to address EPA comments on the HHERA. Additional review was performed to clarify previous analytical results for various constituents of concern including lead, arsenic, chromium, and dioxins/furans. The review found that some constituents did not require additional sampling but that others did. Mr. Holmes stated the SAP includes sample collection and analysis, risk screening and reporting. Samples will be collected from soil, sediment, and surface water.

Mr. Holmes noted that TDEC approval of the VI CSM had been received and that EPA had recently submitted comments. He said HDR will prepare the final VI CSM on this task order, prepare the comprehensive sampling plan, and begin with screening sampling throughout the MI. Mr. Woods asked how the screening samples would be collected, and Mr. Mokri replied that Beacon samplers would be used. This will be followed by installation of VMPs to allow collection of soil vapor samples over time. Sub-slab and indoor air sampling will also be performed.

Mr. Woods asked what the timeframe was for the new contract. Mr. Holmes replied that the task order states that all work will be completed within three years. Mr. Holmes said he hopes sampling will begin this year, with all the sampling completed by the end of 2022.

Federal Facilities Agreement (FFA) Review Timelines

Ms. Hutton emailed a handout of the FFA Requirements for Document Review with the meeting agenda. Ms. Hutton explained that the FFA was written when the Defense Logistics Agency

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 2021**  
**10:30 EDT**

(DLA) operated DDMT; environmental responsibility for DDMT was transferred to Army in 2010. Ms. Hutton noted that the team has always been aware of the FFA's review timelines but has applied the timelines loosely. The team will now tighten adherence to the timelines.

Ms. Hutton stated it is not always clear what is a primary document and what is a secondary document. She noted the FFA describes primary documents as "major, discrete portions of the response action process," whereas secondary documents are described as "typically input or feeder documents to primary documents". Ms. Hutton said that the submittal letters state whether a document is primary or secondary.

Ms. Hutton said that primary documents have a 60-day period for review and comment, and EPA or TDEC can request a 20-day extension of the review period in writing. Ms. Hutton said she will alert team members when the review period is halfway finished. Ms. Hutton asked if there was a consensus that extension requests could be sent via email. The team members on the call agreed that email was acceptable.

Ms. Hutton stated secondary documents have the same 60-day review period. Ms. Hutton noted that, according to the FFA, secondary documents "shall not necessarily be subject to review and comment and may be finalized in the context of the corresponding Primary Documents." Ms. Hutton gave the example of the May 2020 LTM report, which TDEC did not comment on but instead gave approval for the 2020 Annual LTM report. Ms. Hutton said if regulators choose to review a secondary document, the team is happy to receive the comments, but the regulators are not required to review a secondary document; any comments received will be addressed in a subsequent document.

Ms. Hutton stated that, as indicated on the second page of the FFA handout, the review period for the Site Management Plan (SMP) is 30 days.

Mr. Holmes noted the FFA includes lists of primary and secondary documents and that many documents prepared in the early stages of a Superfund project are primary documents, including RI/FS work plans and reports, and records of decision. He said there are not as many primary documents now, since most are monitoring reports, operations reports, or investigation reports, which are secondary documents. Mr. Holmes added that Army would not want to submit a final document for which there had not been general agreement on the earlier secondary documents. He noted that secondary documents cannot be disputed, although any concerns need to be pointed out so that the team can work toward consensus.

Ms. Hutton said the FFA guidance does not indicate a time period for regulatory review of Army's responses to comments (RTCs). She said Army RTCs are generally straight-forward and asked for consensus on a reasonable time period. She suggested 20 days for review of the RTC, with a maximum of 30 days. Mr. Woods agreed to a 30-day maximum, noting that professional courtesy would turn the RTCs around quickly and that it is not necessary to re-read the entire document. The team members on the call concurred with a 30-day maximum timeframe for review of RTCs.

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 2021**  
**10:30 EDT**

Ms. Roebuck asked if an extension to the 30-day turnaround on review of RTCs could be requested. Ms. Hutton answered that FFA does not address a timeframe for review of RTCs, but the team could adopt a 20-day extension of the RTC review upon email request by any party. Ms. Roebuck said that comments and the associated responses have been complicated at times, so a 20-day extension could be beneficial. Mr. Woods agreed that the extra time could be helpful if waiting for approval from the chain-of-command.

Site Management Team Call

Ms. Hutton said that Mr. Holmes had prepared a summary of unresolved EPA comments for review and discussion with BRAC. She stated Army feels some tasks requested by EPA have been addressed in the context of the overall environmental restoration. Ms. Hutton said that a team conference call is planned to discuss which requested tasks are required. It is Army's intention to maintain an amicable relationship with regulatory agencies and to have a cohesive approach to the work ahead. Mr. Woods said he would be willing to join the call.

Other Items

Mr. Woods said that TDEC attorneys have assured him that the TDEC Division of Water Supply would be able to get water data from Memphis Light, Gas and Water (MLGW) if needed for modeling. Ms. Hutton thanked Mr. Woods for that information. Mr. Holmes stated that there is a question whether the modeling would be useful, even if the MLGW data were available. Ms. Hutton believed groundwater modeling had been done for the MI. Mr. Holmes confirmed that it had been. He said the 2009 model included a three-dimensional model for the Memphis aquifer, but source concentrations reaching the Memphis aquifer were modeled with Bioplume, a one-dimensional model. Mr. Holmes noted that the 2009 model had predicted contaminant concentrations above the MCL reaching the MAQ at DDMT but not reaching the Allen well field. LTM sample results show concentrations have decreased in the source areas and that concentrations in the MAQ are less than predicted by the 2009 model.

Mr. Holmes said EPA comments on the 2021 Site Management Plan were received on 4 August.

Mr. Holmes said the 2021 Annual Site Inspection will be submitted by email on 10 August, with a print copy sent to Ms. Lloyd.

Mr. Holmes stated that there were no calls on the Community Information Line in July.

Mr. Holmes said there was no fieldwork planned until October when the quarterly AS/SVE monitoring, semiannual LTM, and SVE Pilot Test sampling and shutdown would occur.

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 AUGUST 2021**  
**10:30 EDT**

**Upcoming Fieldwork**

<b>Contractor</b>	<b>Activity</b>	<b>Dates</b>
KGS/Trinity	AS/SVE Quarterly Monitoring	12 October 2021
HDR	Semiannual LTM	13-22 October 2021
HDR	SVE Pilot Test Extension Vapor Sampling & Shutdown	13 October 2021

Ms. Hutton said that the submittal schedule was emailed with the agenda for today's meeting. She said that the schedule reflects the activity from last week. Ms. Hutton stated that the one thing that is not resolved is whether the most recent set of EPA comments on the May 2020 LTM report was intended for the 2020 Annual LTM report.

Prioritized List of Documents for Regulatory Review

Responses to Comments

None

Reports

1. Annual Long-Term Monitoring Report – 2020 (submitted 4 May 2021) (EPA)
2. HHERA Review SAP (submitted 29 July 2021) (EPA, TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

1. Comments from EPA (8/2/21) on Vapor Intrusion Conceptual Site Model, December 2020.
2. Comments from EPA (8/4/21) on 2021 Site Management Plan (submitted 22 February 2021)

Ms. Roebuck asked if the adherence to the FFA review timeframes would apply to the 2020 Annual LTM report, which was submitted 4 May 2021. Ms. Hutton answered that first it would be necessary to clarify if Ms. Lloyd's recently submitted comments on the May 2020 LTM report were intended for the 2020 Annual LTM report.

**Next Meeting**

The next call will be Tuesday, 14 September at 10:30 AM EDT and 9:30 AM CDT. The dial-in number will be 800-207-9558, with access code 2049034#.