

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

LOCATION: Conference Call

ATTENDEES:

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

CALIBRE BEC – Joan Hutton

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

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, 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 engineering team resumed work on the FFS in September. Mr. Holmes expects the draft report will be submitted 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 and is in regulatory review.

Mr. Holmes said EPA comments were received on the Vapor Intrusion (VI) Study Conceptual Site Model (CSM) in early August. He stated that HDR has not begun responses to the comments but will begin soon. Mr. Holmes said HDR will move forward with the VI Comprehensive Sampling Plan once the VI CSM is completed.

Mr. Holmes stated that the Soil Vapor Extraction (SVE) Pilot Test Extension completed three months of operation and collected effluent samples in July. The samples showed chlorinated volatile organic compound (CVOC) emissions were below the Shelby County Health Department criterion. Mr. Holmes said 14 pounds of CVOCs have been removed in three months of operations, and effluent CVOC concentrations have been stable since May 2020. The test extension will be completed in October. At that time, HDR will have long-term monitoring (LTM) samples that can be compared to determine

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the impact of SVE on VOC concentrations in groundwater. HDR will prepare a memo to close out the pilot test.

Ms. Hutton asked if the data showed any impact due to recent precipitation. Mr. Holmes answered that the pilot test location is mainly paved and would not be affected by infiltration. Mr. Holmes said the latest LTM data for the MI was collected in April 2021 and would not reflect recent conditions.

Mr. Woods asked what the initial concentrations of CVOCs was for the pilot test. Mr. Holmes responded that he did not have the data at hand but that approximately 200 pounds of CVOCs were removed in the first six months. The current emission rate is lower, but the effluent CVOC concentrations have remained about the same since the end of the initial test in May 2020. For comparison, he noted the Air Sparge (AS)/SVE is removing about 0.001 pounds per hour and the pilot test is removing 0.008 pounds per hour, which is coming entirely from soil vapor (not from groundwater).

Ms. Lloyd asked if there were other pilot tests underway. Mr. Holmes replied there are not; this test was undertaken because of the success of SVE on Dunn Field. Additional testing for enhanced bioremediation treatment (EBT) was not considered necessary based on EBT implementation over approximately five years. Based on the feasibility study technology review, HDR engineers think AS/SVE, and possibly SVE on its own in some places, would be the appropriate remedy. Mr. Holmes said the selection will be discussed in the FFS report.

DUNN FIELD

Remedial Action

Status of Air Sparge (AS)/SVE Operations

Mr. Pannell said the AS manifold was opened on 27 July and closed on 1 September. Mr. Pannell stated that photoionization detector (PID) and vapor monitoring point (VMP) measurements were collected on 3 August. He added that some repairs were conducted at that time. Specifically, connectors for the SVE exhaust piping were repaired and supports added in order to prevent the pipes sagging, and the air-conditioner for the computer room was replaced.

AS/SVE O&M Reporting

Mr. Pannell said the Year 9 Annual Report was approved on 4 August, with the Rev1 report submitted to USACE on 11 August. The Year 10 Semiannual Report, Rev0, was submitted to EPA and TDEC on 11 August. Mr. Pannell said the Year 10 Annual Report is being prepared.

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Ms. Hutton stated, as a reminder to the team, that the semiannual reports do not require regulatory comments, though comments are certainly welcome. She said that responses to comments would be prepared, but the responses would be incorporated in the subsequent annual report.

Ms. Lloyd acknowledged that practice. She stated that, if comments are not received or not addressed in the semiannual report, the report should not state that it has “regulatory approval,” as approval is a different status than not having comments. Ms. Hutton agreed and asked that this call summary reflect the understanding that regulatory approval is not indicated when no comments are submitted.

Offsite Investigations

Offsite Groundwater Investigation (OSI)

Mr. Holmes said the Draft OSI report was submitted 3 September for internal review. He expects the report will be submitted for regulatory review in October.

MW-87 Area Investigation

Mr. Holmes said that the draft report of the MW-87 area investigation is almost complete with final revisions being made to the risk assessment. Mr. Holmes said the report will be for internal review submitted on 16 September.

LONG TERM MONITORING (LTM)

Mr. Holmes stated that EPA comments on the 2020 LTM Report were received in August. He stated that HDR will soon begin preparing responses to those comments.

Mr. Holmes said the April 2021 LTM Summary Report, Rev0, was submitted to EPA and TDEC on 16 August.

OTHER ISSUES

Ms. Hutton announced that the Army will soon publish a website containing the Administrative Record (AR)/Information Repository (IR) for DDMT. Ms. Hutton said that, thanks to Ms. Shirley’s help, the Army worked with an IT person in USACE Mobile District to create the website, and final debugging is occurring now. Ms. Hutton expects the website to ease public access to the documents and will alleviate the burden TDEC was experiencing with information requests. Ms. Hutton will send the website URL to team members, and an article about the website will be included in the annual newsletter in December. Ms. Shirley added that the website is very simple and direct, which she expects will make it easy to use. Ms. Lloyd and Mr. Woods congratulated

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Army for accomplishing this task earlier than expected. Ms. Lloyd mentioned that DDMT is one of the more visited pages on the EPA Superfund website.

Ms. Hutton asked if the DDMT information on the EPA website could be updated when the AR/IR website is published. Ms. Lloyd agreed to coordinate that, noting that doing so will be easier now than under the previous administration.

Mr. Holmes said EPA comments were received on the 2021 Site Management Plan (SMP) on 4 August, and responses to those comments were submitted 24 August.

Mr. Holmes stated the 2022 SMP is being prepared.

Mr. Holmes said 2021 Annual Land Use Controls Site Inspection Report, Rev0, was submitted to EPA and TDEC on 10 August.

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

Mr. Holmes noted that there has been discussion with Army and USACE about unresolved responses to EPA comments. Mr. Holmes said that it has been proposed to have a conference call or meeting to resolve the comments or, at least, to understand each party's position on the comments.

Ms. Hutton said that the submittal schedule was emailed on 13 September along with the agenda for today's meeting. The submittal schedule was updated 31 August.

Mr. Holmes stated that there is no fieldwork planned until AS/SVE monitoring, LTM and shutdown of the SVE Pilot Test in mid-October. Dates are listed below.

Upcoming Fieldwork

Contractor	Activity	Dates
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

Mr. Holmes noted the prioritized documents for review as listed below.

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Responses to EPA Comments on 2021 Site Management Plan (submitted 24 August 2021)

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Reports

1. HHERA Review SAP (submitted 29 July 2021) (EPA, TDEC)
2. Annual Site Inspection Report (submitted 10 August 2021) (EPA, TDEC)
3. April 2021 LTM Summary Report (submitted 16 August 2021) (EPA, TDEC)

Documents Requiring Army Revision or Response to Agency Comments

1. Comments from EPA (8/2/21) on Vapor Intrusion Conceptual Site Model (December 2020).
2. Comments from EPA (8/31/21) on Annual LTM Report-2020 (May 2021)

Ms. Lloyd asked about the team's discussion during the August SMT call. Ms. Lloyd was unable to attend the meeting due to fieldwork on a barge in the Tennessee River. Ms. Hutton asked if, in the future, Ms. Lloyd would decline the meeting invitation when she realizes her schedule will prevent her from attending. Ms. Hutton had not been aware that Ms. Lloyd was out of office until two weeks after the monthly meeting.

Ms. Hutton asked if Ms. Lloyd wanted to review what was discussed in the previous meeting. Ms. Lloyd answered that she would like to know everyone's thoughts on the Federal Facilities Agreement (FFA) review timelines. Ms. Hutton asked if Ms. Lloyd had reviewed the call summary of the August meeting, as she would need to review the summary before further discussion.

Ms. Hutton said that one item that had not been discussed in detail in the previous call was extensions. Mr. Holmes added that the FFA does not spell out a timeline for agency review of responses to comments. Mr. Holmes said that on the previous month's call, team members agreed to a 30-day timeline for agency review of the responses. Ms. Lloyd agreed that the DDMT FFA was one of the older FFA agreements and some of the older agreements did not specify timelines for regulatory responses. Ms. Lloyd did not respond regarding the period for reply to comment-responses but stated that an extension of 30 days was a common practice.

Ms. Lloyd noted that there are different timelines for different types of documents and she would have to look at the FFA for the specific limits. Mr. Holmes said that he believes that all documents have a 60-day review period except for the annual SMP, which has a 30-day review period. Mr. Holmes noted the FFA specifies that the SMP must be finalized by 1 March in each year, for the SMP is the basis for actions taken throughout the year.

Ms. Hutton stated that it is important to have Ms. Lloyd's agreement with the intended timelines. Ms. Hutton said that HDR will soon begin work on the new contract and that

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numerous documents will be generated for review, which might become confusing if the team does not develop a timely approach to review. Ms. Hutton asked if Ms. Lloyd would review the previous month's call summary. The team could meet again to discuss the timelines, if Ms. Lloyd believes another call would be appropriate.

Mr. Foster stated his appreciation for the open dialogue that this team maintains. He stated that he will be supportive anytime that a team member wishes to take a discussion offline. Mr. Foster said that if a stumbling block needs further discussion, he will set aside time for that in order to determine a path forward.

Ms. Lloyd agreed that sometimes small groups are an efficient way to resolve issues. Ms. Lloyd noted that the monthly teleconferences are definitely part of the partnering process. She said that the team hasn't actually followed the partnering process, which is more involved than a monthly teleconference, because of the good relationships that the team has maintained and the willingness of team members to schedule additional teleconferences when needed.

Ms. Lloyd stated that she believes some things need to be ironed out before the team moves on to the FFS. Mr. Foster asked if Ms. Lloyd wanted another meeting soon. Ms. Lloyd responded that it would be better to first hammer out what things need to be discussed before scheduling another meeting. Ms. Lloyd said that she has made comments on several reports that have not been addressed. She said she would capture that and other team members could do the same, then the team could compare lists to determine what should be discussed.

Mr. Holmes said that he has been tasked to prepare a list of issues related to past document comment-responses for review by Army and submittal to Ms. Lloyd and Mr. Woods for further discussion. Ms. Lloyd said that sounded good and she requested that Mr. Holmes prepare that ahead of the FFS, though doing it concurrently with the FFS would also be acceptable.

Ms. Hutton said that the Army has been working on such a list internally; the Army does not agree with some of the EPA's requests such as robust modeling, reversal of groundwater flow, and redeveloping soil remedial action objectives. Ms. Hutton asked if these items were part of the content that Ms. Lloyd foresaw for this upcoming meeting. Ms. Lloyd agreed that she would like to discuss that. Ms. Hutton said that, because the draft FFS would soon be submitted, the meeting would take place concurrently with the FFS. Ms. Hutton noted that the FFS is focused completely on groundwater.

Ms. Lloyd stated she has mentioned before that she disagrees with the piecemeal way the site activities are divided, with groundwater discussed separately from soil vapor. Ms. Lloyd believes that a more holistic, site-wide approach is needed.

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Next Meeting

The next call will be Tuesday, 12 October at 10:30 AM EDT and 9:30 AM CDT. The dial-in number will be 800-207-9558, with access code 2049034#.