

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
11 JANUARY 2022
10:30 EST

LOCATION: Conference Call

ATTENDEES:

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

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 (absent)

HDR EOC – Tom Holmes, Nancy Jepsen, Clayton Mokri

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 FFS report is in preparation. He expects the draft report will be submitted for Army review at the end of this week.

Mr. Holmes said that the Human Health and Ecological Risk Assessment (HHERA) update is waiting on review by the EPA. Implementation of the Sampling and Analysis Plan (SAP) will be scheduled upon approval.

Mr. Holmes said Mr. Mokri is working on the Vapor Intrusion (VI) Study Comprehensive Sampling Plan. The CSP is scheduled to be submitted in February. Mr. Holmes noted that responses to EPA's comments on the Conceptual Site Model (CSM) were submitted in November, but EPA has not replied.

Mr. Holmes noted the report summarizing the Soil Vapor Extraction (SVE) Pilot Test Extension was submitted last week for internal review. Ms. Hutton asked if that report would be submitted for regulatory review. Mr. Holmes said it would not be, though if a future document references the report, it would be included as an appendix to that report.

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DUNN FIELD

Remedial Action

Status of Air Sparge (AS)/SVE Operations

Mr. Pannell stated the AS manifold was opened on 29 November and remained open for December. He noted quarterly AS/SVE monitoring was conducted on 13 December. The quarterly effluent air sample and bi-monthly pressure and photoionization detector (PID) readings at vapor monitoring points (VMPs) were collected; a groundwater sample from MW-159 was also sampled at that time.

Mr. Pannell said that on 16 December Kaiser diagnosed that the noise at Blower 1 was due to rust on the rotor. Kaiser recommended that the blower be run more frequently.

Mr. Pannell stated that on 22 December, Blackwell diagnosed an issue with an AWS transfer pump. Blackwell disassembled the pump, sand-blasted it in their shop, and reinstalled the pump on 23 December. It is now operating correctly.

Mr. Pannell said that all AS wells were shutdown on 28 December, except AS91 through AS95. He noted these five AS wells were installed in October 2020 with the objective of more quickly reducing volatile organic compound (VOC) concentrations in MW-159. January is normally a stand-by month with blowers operating every other day and the AS manifold closed. Those five wells will keep operating 4 hours each day every month to see if VOC concentrations at MW-159 can be decreased more rapidly. This schedule will be implemented for six months. In addition, MW-159 will be sampled more frequently to track progress.

Mr. Holmes said the concentration at MW-159 for the December sampling event was 48.7 µg/L; slightly below the active treatment objective of 50 µg/L. Mr. Holmes said the data would be provided for inclusion in the Year 11 Semiannual Report.

AS/SVE O&M Reporting

Mr. Pannell said that the Year 10 Annual Report Revision 0 was submitted electronically on 4 January for regulatory review. A revised Year 10 Semiannual Report was submitted on the same day. Mr. Pannell said that in the process of preparing the annual report, an error in the mass removal calculations were noticed in the semiannual report. A formula on Table 5, which totals the VOCs in SVE effluent, was double-counting the primary VOCs. This caused an error in Table 6, which estimates the mass removed. Mr. Pannell said the corrected mass removal is consistent with the historical results of approximately 2 pounds per year. Mr. Pannell stated that the Year 10 Annual Report contains all the correct information, and the corrected Year 10 Semiannual Report was

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submitted only for administrative purposes. He asked that regulatory agencies not comment on the semiannual report, but instead focus on the Year 10 Annual Report.

Offsite Investigations

Mr. Holmes said that the Offsite Groundwater Investigation Report Revision 0 was submitted for EPA and TDEC review on 5 January.

Mr. Holmes stated that comments have been received from BRAC Environmental Law Division (ELD) on the Dunn Field West (MW-87 Area) Investigation Report. Mr. Holmes said that only a few comments were received and that responses have been submitted but further discussion is needed. Ms. Hutton said that one comment pertained to environmental justice process and asked Mr. Foster if he was familiar with the process. Mr. Foster answered that he and Ms. Hutton would need to circle back to ELD for clarification.

Ms. Hutton noted that these two reports support conveyance of the property.

LONG TERM MONITORING (LTM)

Mr. Holmes stated that the 2020 LTM Report Revision 0 is waiting for resolution of EPA comments. EPA had commented on the report in August, and responses to those comments were submitted in November. Mr. Holmes said that the April 2021 LTM Report Revision 0 is also waiting for comments. Mr. Holmes noted that all of the data in the April 2021 LTM report is included in the 2021 LTM annual report, which is currently being prepared for submittal in late January.

Mr. Holmes said that during the October 2021 sampling event, a cooler of samples was not delivered to the lab as scheduled, and that when the cooler was delivered the samples were at a higher temperature than allowed and were not analyzed. Mr. Holmes said those samples were re-collected in December and sent for analysis. He said the analytical results were received on 3 January. The results will be included in the 2021 LTM annual report.

OTHER ISSUES

Mr. Holmes noted that the discussion regarding the Federal Facility Agreement (FFA) and unresolved EPA comments will be re-scheduled. Ms. Hutton said that Ms. Lloyd agreed to look at the schedule for her and her team soon after she returns from leave this week. Ms. Hutton added that Ms. Shirley had expressed interest in visiting DDMT. Ms. Hutton will suggest to Ms. Lloyd that the entire Site Management Team should visit DDMT together. Ms. Hutton stated that she has asked Mr. Holmes to add an agenda

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item to the upcoming FFA/unresolved comments meeting on the value of having the EPA Regional Project Manager attend the monthly Site Management Team meetings.

Mr. Holmes said the 2021 Site Management Plan (SMP) Revision 1 was submitted in December. He also said the 2022 SMP Revision 0 was submitted at the end of November. Ms. Hutton noted that TDEC approval of the 2022 SMP was received today. Mr. Holmes noted that the 30-day review period has expired and there have been no comments or request for extension from EPA.

Mr. Holmes said the 2021 EnviroNews, the DDMT annual newsletter, was mailed on 17 December and all Site Management Team members should have received their copy.

Mr. Holmes asked Mr. Woods if he had reviewed the Administrative Record/Information Repository (AR/IR) indices to determine if TDEC needed additional documents. Mr. Woods answered that Ms. Denise Cooper (HDR) had said that with the online repository, TDEC would not need their own copy of the documents. Mr. Holmes said he had thought TDEC still needed some documents due to state requirements and that he would review that with Ms. Cooper.

Mr. Holmes said the annual updates to the AR/IR indices would be submitted in February and that HDR is moving forward with submittal of AR documents to the Washington National Records Center.

Ms. Hutton said she updated the submittal schedule on 5 January. The updated schedule was included with the agenda for this meeting.

Mr. Woods complimented the 2022 SMP, saying that sections 4 and 5 neatly summarized the work that has been done at DDMT.

Mr. Foster congratulated the team on their hard work. He stated that the yearly funding for DDMT has been approved and he is looking forward to a productive new year. Ms. Hutton stated that credit for the DDMT funding is due to Ms. Shirley's and Ms. Roebuck's consistent documentation of the work at DDMT and their prudent use of funds. Mr. Foster also complimented Mr. Woods and expressed his gratitude for Mr. Woods' reliability, straight answers, and accurate information. Mr. Foster reiterated that the Army is not going to walk away from their commitments and requirements.

Mr. Woods noted a Memphis Light, Gas and Water representative had told him that University of Memphis Groundwater Institute had changed plans regarding modeling for the Allen Well Field, including potential impacts from DDMT. Another location is being considered.

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Upcoming Fieldwork

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Quarterly Monitoring	TBD February 2022
HDR	Semiannual LTM	TBD April 2022

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Responses to EPA Comments on VI CSM (submitted 4 November 2021)
2. Responses to EPA Comments on Annual LTM Report-2020 (submitted 10 November 2021)

Reports

1. HHERA Review SAP (submitted 29 July 2021) (EPA)
2. Annual Site Inspection Report (submitted 10 August 2021) (EPA)
3. April 2021 LTM Summary Report (submitted 16 August 2021) (EPA)
4. 2022 Site Management Plan (submitted 29 November 2021) (EPA)
5. Offsite Groundwater Investigation Report (submitted 5 January 2022) (EPA, TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

None

Next Meeting

The next call will be Tuesday, 8 February at 10:30 AM EST and 9:30 AM CST. The dial-in number will be 800-207-9558, with access code 2049034#.