

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
10 MAY 2022
11:00 EDT

Army, Base Realignment and Closure Division (DAIM-ODB): Jay Foster
CALIBRE BEC: Bill Millar
U.S. EPA, Region 4, DDMT Project Manager – Fernando Martinez Torres
TDEC Division of Remediation, DDMT Project Manager – Jamie Woods
USACE, Mobile – Bob Beacham (absent), Laura Roebuck, Melissa Shirley
Koman Government Solutions: Larry Pannell
HDR EOC: Tom Holmes, Clayton Mokri (absent), Nancy Jepsen

GENERAL

Mr. Millar stated that he and Mr. Foster would like to have a call with Mr. Woods and Mr. Martinez Torres to discuss the Dunn Field West property transfer. Mr. Millar said he would email to find a convenient time.

MAIN INSTALLATION (MI)

Remedial Action – Mr. Holmes stated that there is no current remedial action on the MI. He said there are three documents for the MI currently in progress.

Focused Feasibility Study (FFS)

Mr. Holmes stated that HDR is preparing a revised draft of the FFS. He said he expects to submit the document to Army and USACE in May, with submittal to the regulators in June.

Human Health & Ecological Risk Assessment (HHERA) Sampling & Analysis Plan (SAP)

Mr. Holmes said conditional approval of the SAP was received from the EPA. He expects to submit Revision 1 of the SAP this week. [Note: HHERA Review Sampling & Analysis Plan, Revision 1 was submitted to EPA and TDEC on 18 May 2022.]

Vapor Intrusion (VI) Study

Mr. Holmes stated that HDR is working on Revision 1 of the VI Conceptual Site Model (CSM). He noted that one of Ms. Lloyd's comments was the need for a comprehensive CSM for all exposure pathways. Mr. Holmes said he is reviewing the effort to develop the comprehensive CSM in accordance with EPA and USACE guidance; it will be incorporated in a later document, probably the VI Comprehensive Sampling plan in preparation.

Mr. Martinez Torres said EPA is reassessing the responses to comments submitted for the 2022 Site Management Plan (SMP).

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DUNN FIELD

Remedial Action

Status of Air Sparge (AS)/Soil Vapor Extraction (SVE) Operations

Mr. Pannell stated that April was an “on” month for the AS/SVE system, and all AS wells were operating from 5 April to 3 May.

Mr. Pannell said that on 5 April the bimonthly monitoring of the vapor monitoring wells was conducted; photoionization detector (PID) measurements were taken and the third quarter effluent air sample was collected. Approximately 550 gallons of condensate water was transferred from the AS/SVE system to the bulk collection tank. A leaking hose related to the compressor was found and repaired, but this did not resolve the air leak that had been occurring.

Mr. Pannell stated there was a compressor alert of no pressure buildup on 7 April, which shut the system down until 11 April. He noted the blowers were shut off for approximately half that time to facilitate the long-term monitoring (LTM) groundwater sampling event.

He noted there was a flash flood warning for the Memphis area from 13 April to 14 April; the blowers were shut off for approximately 20 hours during that time as a precautionary measure to minimize the amount of condensate water generated.

Mr. Pannell stated that another issue with the compressor pressure was identified on 26 April; the compressor was shut down until Kaeser could evaluate the system during semi-annual preventative maintenance for the compressor and blowers on 28 April. Maintenance was performed; Kaeser diagnosed and repaired the compressor pressure issue, which was caused by a stuck pneumatic valve, and corrected a water leak beneath the compressor receiver tank.

Mr. Pannell said the AS/SVE system was shut down on 3 May, with the exception of AS wells 91 through 95. He said that since January, those five wells have continued to run during “off” months with the goal of more quickly reducing volatile organic compound (VOC) concentrations at LTM MW-159.

AS/SVE Reporting

Mr. Pannell said that EPA comments were received on the Year 10 Annual Report on 21 April and that responses to comments are being prepared. [Note: Mr. Woods provided TDEC approval of the Year 10 Annual Report on 20 May 2022.]

OFFSITE INVESTIGATIONS

Offsite Groundwater Investigation

Mr. Holmes stated that EPA comments were received on the Offsite Groundwater Investigation to the north of Dunn Field and that responses to those comments were submitted on 6 May.

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Dunn Field West Post-ROD Supplemental Investigation

Mr. Holmes said the Dunn Field West investigation report was submitted in March. TDEC submitted approval of the report on 10 May and HDR is preparing responses to EPA comments received 18 April.

LONG TERM (LTM) MONITORING

April 2022 LTM

Mr. Holmes stated that the April 2022 sampling event was completed and samples were received at the laboratory with no issue. He said that HDR is waiting on the final Level 4 report in order to complete the data quality evaluation.

LTM Reporting

Mr. Holmes said that the 60-day comment review period will end on 16 May for the Annual LTM Report – 2021.

OTHER ISSUES

Mr. Holmes stated that future Site Management Team (SMT) calls were planned to be held via WebEx, which can provide captions. The host has to permit that option and then any attendee can display the captions by clicking 'Ctrl P' on their keyboard.

Mr. Holmes noted the document review requirements in the DDMT Federal Facility Agreement (FFA) The standard review period is 60 days for all documents, except for a 30-day review period for the SMP. He said that Army then has 60 days to send a response to comments and 120 days to submit a revised document; the SMT (Army, EPA and TDEC) agreed on a February 2022 call to a 30-day review period for EPA and TDEC to reply to the Army responses; the FFA has no process for further revision of the final (Revision 1) document other than dispute resolution. He noted that the SMT (Army, EPA and TDEC) can collectively agree to deviate from FFA requirements.

Mr. Holmes emailed a Document Submittal Tracker spreadsheet to the participants prior to this SMT call. The spreadsheet is a slightly reduced version of a template provided by Mr. Martinez Torres. Mr. Holmes discussed the columns of the tracker, noting the associated time period for item. He said that he included all the documents that are to be submitted as Revision 0 or Revision 1 in 2022. Comments/corrections should be sent to Mr. Holmes.

Mr. Martinez Torres said that the SMP might require further review. Mr. Holmes noted the SMP is prepared for submittal in October with the intent of being a planning document for the upcoming year. The document could be revised but it might not be worthwhile to do so.

Mr. Martinez Torres suggested that if an extension for document submittal is needed, it should be requested early so that all team members can adjust schedules accordingly. Mr. Woods agreed and said that the team has been good about requesting extensions ahead of time.

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Mr. Holmes stated that there were no calls on the Community Information Line. He said that is not surprising, for calls usually only occur after the yearly newsletter (EnviroNews) is distributed or if there is something in the news about DDMT.

Mr. Holmes asked Mr. Martinez Torres for a mailing address so that he could be included on the EnviroNews mailing list. He asked if Mr. Martinez Torres would like to continue receiving paper copies of documents. He noted that a print copy of the text, tables, and figures of each Revision 0 report, along with a cd of that report was submitted to Ms. Lloyd of the EPA. Mr. Martinez Torres said to hold off for a bit, for EPA has been trying to get away from paper copies. He said that he prefers to do everything via email or other electronic transmittal means. Mr. Martinez Torres said that he would have a firm answer next week.

Mr. Holmes also asked about submittal of documents on cds; Ms. Lloyd had recently informed the team that EPA staff could no longer access cds. Recent submittals have been made by HDR using OneDrive or following a request via DoD SAFE. Mr. Martinez Torres said he would be willing to try OneDrive or DoD SAFE.

Mr. Holmes said that the Information Repository (IR) update is being prepared. He reminded the team that all documents of the Administrative Record (AR) and IR are available via the web at <https://ww3.sam.usace.army.mil/DDMT/>.

Mr. Holmes said the Five-Year Review is ongoing, and the site inspection will take place later this week.

Mr. Woods said he has not heard anything further from Memphis Light, Gas and Water (MLGW) about water level measurements.

UPCOMING FIELDWORK

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Quarterly Monitoring	TBD June 2022
HDR	HHERA Review SAP Sampling	TBD June-July 2022

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Responses to EPA Comments on Offsite Groundwater Investigation Report (submitted 10 May 2022)

Reports

1. Annual LTM Report – 2021 (submitted 17 March 2022) (EPA, TDEC)

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Documents Requiring Army Revision or Responses to Agency Comments

1. Comments from EPA (18 April 2022) on Dunn Field West Post-ROD Supplemental Investigation Report (submitted 3 March 2022)
2. Report completion without approval from EPA (18 April 2022) on Vapor Intrusion Conceptual Site Model (December 2020)
3. Comments from EPA (21 April 2022) on Off Depot Air Sparge-Soil Vapor Extraction System (AS/SVE) Annual Operations Report, Year 10 (January 2022)

Next Meeting

The next call will be Tuesday, 7 June at 11:00 AM EDT and 10:00 AM CDT. The meeting will take place via WebEx. Invitations will be emailed to participants.