

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

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

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, Nancy Jepsen

TechLaw: Mac McRae (absent)

Mr. Millar began the meeting by saying he looks forward to the in-person meeting at DDMT on Wednesday, 19 October and would like to begin that meeting at 9 am.

MAIN INSTALLATION (MI)

No remedial action at the MI.

Focused Feasibility Study (FFS)

Mr. Holmes stated that the FFS is being reviewed by the Army Environmental Law Division (ELD) and he has begun the draft decision document using the Explanation of Significant Differences (ESD) format; it can easily be revised to include the additional information required for a Record of Decision Amendment (AROD). An AROD would also require a prior revised proposed plan (and public meeting).

Human Health & Ecological Risk Assessment (HHERA) Sampling

Mr. Holmes stated that HHERA sampling was completed in August. HDR was able to access the final sediment/surface water location; the surface water sample was collected, but there was no sediment in the channel. Analytical results were in process, although delayed. Analytical results are expected this week and HDR will proceed with data validation upon receipt.

Vapor Intrusion (VI) Study

Mr. Holmes said the Draft Vapor Intrusion Comprehensive Sampling Plan (VI CSP) was submitted to Army for review on 2 September.

DUNN FIELD

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

Mr. Pannell said August was an “on” month for the AS/SVE system, with all wells operating from 1 August through 30 August. September is an ‘off’ month, with only wells AS-91 through AS-95 operating all month. As noted on earlier calls, AS-91 through AS-95 continue operating during ‘off’ months to reduce concentrations at MW-159 below the treatment criteria. Mr. Pannell added that wells AS-1 through AS-42 will run from 11 September through 20 September to reduce

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downgradient migration of CVOCs. The trichloroethene (TCE) concentration at 6 parts per billion (ppb) in the April 2022 sample from MW-246 exceeded the Maximum Contaminant Level (MCL). The TCE concentration in the most recent sample from August 2022 had decreased to the previous concentration level near 3 ppb. The reason for the increase in April is considered to be contaminant migration resulting from operation of AS-91 through AS-95 during 'off' months without the AS wells along the main transect; operation of the additional air sparge wells for a week during the middle of the month appears to prevent the contaminant migration.

Mr. Martinez Torres asked if MW-246 was on Dunn Field or offsite and asked if the Army had identified other circumstances where contamination might be drawn onto the site from operation of the AS/SVE system. Mr. Holmes shared Figure 3 from the Annual Long-Term Monitoring Report – 2021 via Webex, which showed MW-246 was just north of the AS well transect (see attachment). He discussed the groundwater flow direction, previous plume migration from Dunn Field to the Off Depot area, initial CVOC concentrations in the plume (up to 10,000 ppb), and current low concentrations near the MCL. The location of MW-159 and the 'new' AS wells were also noted. No other circumstances for the brief increase in TCE concentration are suspected.

Mr. Martinez Torres asked if any private properties were in the area. Mr. Holmes indicated that there were houses to the southwest and to the west across Ragan Street. The property directly north of MW-246 is an Memphis Light, Gas, and Water (MLGW) substation.

Mr. Woods said the Year 9 Annual Report showed TCE concentration at MW-159 was 91 ppb. He asked what a recent level was. Mr. Holmes replied the concentration in April 2022 was 28 ppb at MW-159, adding that 50 ppb was the active remediation target. The August sample from MW-159 had TCE at 35 ppb.

Mr. Pannell said that condensate was transferred to the storage tank on 11 August. On 16 August, the bimonthly SVE, PID, and vacuum measurements were collected.

AS/SVE Reporting

Mr. Pannell said the Year 11 Annual Report is being prepared. He expects to submit that to the Army for review at the end of September.

OFFSITE INVESTIGATIONS

Mr. Holmes said the Offsite Groundwater Investigation report, the Dunn Field West Post ROD Supplemental Investigation report, and Dunn Field West property transfer documents are being reviewed by ELD. Mr. Martinez Torres asked if these were the documents that were not approved by the EPA. Mr. Holmes answered that the EPA comments on the Offsite Groundwater Investigation report and the Dunn Field West Post-ROD Supplemental Investigation report had not been resolved; Army responses to the comments were provided and Mr. Martinez Torres had provided letters reviewing the responses; ELD will prepare responses to the letters.

Mr. Martinez Torres said he would like a more explicit discussion of the lines of evidence for the offsite contamination. He thinks that a memo or similar document would help with future questions. Mr. Holmes said that the lines of evidence for are presented in the Offsite

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Groundwater Investigation report; the lines of evidence are the groundwater gradient; contaminant concentrations upgradient of the site; and the absence of contaminants in the northeast corner of Dunn Field, which would have to be the onsite source area for groundwater contaminants. Mr. Holmes said those lines of evidence could be pulled from the report into a separate document, if needed.

Mr. Martinez Torres said he still questions what the surface drainage or stormwater runoff would do because he has not read all the DDMT reports yet. Mr. Holmes agreed that information regarding previous investigations could be discussed on a separate call. He noted that surface water is not usually a concern because the contamination is in groundwater and there is approximately 30 feet of clay between the surface and the coarse-grained soil of the fluvial deposits; groundwater is at approximately 50 feet below ground surface in that area of Dunn Field.

LONG TERM MONITORING (LTM)

Mr. Holmes said EPA's letter for review of the responses to comments on the 2021 LTM report had been received. EPA's general comments 1 and 2 asked whether revised language would be in the report. He stated the text would be revised using the responses and that a tracked changes version of the report would be submitted for final review.

Mr. Holmes stated that Mr. Martinez Torres had requested a discussion of lines of evidence showing no connection between Department of Defense (DoD) activities and contamination of metals, polycyclic aromatic hydrocarbons (PAHs), PFAS, emerging contaminants, etc. The LTM report would not be the appropriate place to cover that information. Mr. Millar asked if any documents already contain that information. Mr. Holmes answered that the remedial investigation (RI) reports by CH2MHILL would describe site activities and sample analyses; he noted that the RI had no indication that DoD activities would have impacted offsite properties other than potential groundwater impacts.

Mr. Martinez Torres responded that he understands that the LTM is limited to specific concerns. For future reference, he thinks the same language should be used in every report that mentions offsite contamination. He thinks that when the property is transferred, people will become more interested in the site and its history. Mr. Millar agreed that it would be useful, but to cover the information sufficiently would require a longer document than imagined. Mr. Martinez Torres agreed but said that it would be good for the regulators to have a concise document to which they could refer quickly when responding to a community concern.

Mr. Holmes said discussion of the Offsite plume in the LTM report cites the Offsite Groundwater Investigation report, which has extensive background on previous investigations. Mr. Woods said that the Offsite Groundwater Investigation report covered all the data gaps that remained from TDEC's four or five preliminary assessments and site investigations conducted by TDEC with EPA.

Mr. Martinez Torres said additional investigation by EPA was being considered. EPA has a mobile lab which could be used for screening offsite areas around Dunn Field. Mr. Woods asked if that was a soil gas screening. Mr. Martinez Torres answered that EPA would discuss further

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details with TDEC as planning moves forward. Mr. Woods offered that soil gas was investigated upgradient and asked Mr. Holmes if it was soil gas or indoor air that HDR had investigated downgradient of Dunn Field. Mr. Holmes responded that soil gas sampling was performed west of Dunn Field. Mr. Woods asked when that investigation was performed in relation to remediation of the central plume. Mr. Holmes answered that it was before the AS/SVE system began operation, and plume concentrations were between 1,000 and 10,000 ppb at that time. Mr. Woods said he appreciated the information and looked forward to discussing the matter further with Mr. Martinez Torres.

Mr. Holmes said that HDR and the Army would respond to the EPA's review of comments for the LTM and move forward with preparing the Revision 1 version.

Mr. Holmes said the next LTM sampling event will take place 11 through 21 October. It will be a biennial event for the MI with all 188 wells to be sampled, and a semiannual event for Dunn Field with only 9 wells to be sampled. Mr. Woods said he would request Memphis Aquifer water level information through his contact at MLGW.

OTHER ISSUES

Mr. Holmes noted that the SMT meeting in Memphis is scheduled for 19 October. He asked that team members contact Mr. Millar or himself with suggested topics for discussion.

He noted the status of documents:

- Fifth Five-Year Review was submitted to EPA and TDEC on 9 October.
- HDR has begun preparing the 2023 Site Management Plan.
- EPA comments were received on the Annual Site Inspection, Rev0. Draft responses are being reviewed and will be submitted this week. Mr. Woods apologized but said he could not locate his copy. Mr. Holmes agreed to email Mr. Woods a copy.

Mr. Holmes replied to a comment from Mr. Martinez Torres, in the EPA letter for the 2021 LTM report, regarding submittal of revised text with responses to EPA comments. Past practice has been to submit the revised text after general agreement on the responses to comments. The revised text with tracked changes could be provided for review prior to submittal of Rev1. Mr. Martinez Torres replied that would be acceptable.

Mr. Holmes said there had been no calls on the Community Information Line since the SMT meeting on 9 August.

Mr. Holmes noted HDR is drafting articles for the annual newsletter, EnviroNews. Also, the mailing list is updated based on returned newsletters. The number of community addressees has decreased over time to approximately 2,800 at present. HDR has arranged to receive a new set of addresses for people in the DDMT area that will increase the number of recipients to approximately 4,000.

Mr. Holmes said the Administrative Record/Information Repository website (<https://ww3.sam.usace.army.mil/DDMT/>) was updated on 12 August.

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Mr. Holmes asked if there were any comments on the Document Tracker or Action Items that were sent with the agenda for this meeting. Mr. Woods and Mr. Martinez Torres asked for clarification. Ms. Shirley volunteered to forward the documents to Mr. Woods and Mr. Martinez Torres for review. Mr. Holmes suggested sending any comments to him and the trackers would be revised as needed.

Mr. Millar said the ELD has hired another attorney, who onboarded this week. He noted that previously work was divided among the attorneys by geography (sites in western states vs eastern states). He suspects a similar division will be implemented again.

Mr. Martinez Torres asked if an environmental justice (EJ) screening had been performed at DDMT. Mr. Millar responded that no, a screening had not been performed. Instead, community outreach comprised the information line and the annual newsletter. Ms. Shirley asked if an EJ screening was a requirement of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) or a requirement for National Priority List sites. Mr. Martinez Torres answered that it was not. Mr. Woods said there had been a Restoration Advisory Board (RAB) that held monthly meetings for several years. However, once the cleanup for Dunn Field was mostly complete and the AS/SVE system was operational, interest waned; the RAB voted to adjourn in 2009. Mr. Holmes said demographic information is included in the Community Involvement Plan (dated December 2020; <https://ww3.sam.usace.army.mil/DDMT/>, AR1509).

UPCOMING FIELDWORK

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Quarterly Monitoring	17 to 18 Oct 2022
HDR	LTM Semiannual Sampling	11 to 21 Oct 2022

Prioritized List of Documents for Regulatory Review

Responses to Comments

None

Reports

1. 2022 Annual Site Inspection Report (July 2022) (TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA comments (17 May 2022) on 2022 Annual Site Inspection Report
2. EPA reply (7 June 2022) to RTCs on Offsite Groundwater Investigation Report
3. EPA reply (29 June 2022) to RTCs on DFW Post-ROD Supplemental Investigation Report
4. EPA reply (12 September 2022) to RTCs on Annual LTM Report – 2021.

The next meeting will be held in person at DDMT on Wednesday, 19 October.

Figure 3

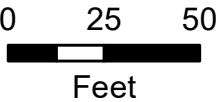
AS/SVE System

Annual Long-Term
Monitoring Report-2021

Defense Depot
Memphis, Tennessee

Legend

- Monitoring Well Screened in the Fluvial Aquifer
- Monitoring Well Screened in the Intermediate Aquifer
- AS Location (1/2 time)
- AS Location (full time)
- AS Location (closed)
- New AS Location (planned)
- VMP Location
- SVE Location
- Conveyance Lines
- New Conveyance Line (planned)
- SVE Compound
- Roads
- Railroad
- Parcel Boundary



Projection: NAD 1927 StatePlane Tennessee
Units: Feet, Elevation Units: Feet , mean sea level

Date: 11/3/2021
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