

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**8 NOVEMBER 2022**  
**11:00 EDT**

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

**MAIN INSTALLATION (MI)**

No remedial action at the MI.

**Focused Feasibility Study (FFS)**

Mr. Holmes stated that the FFS Revision 0 was submitted for regulatory review on 30 September. Comments are due on 30 November.

**Human Health & Ecological Risk Assessment (HHERA) Sampling**

Mr. Holmes said that analytical results for soil, sediment, and surface water have been received, and data validation is complete. HDR is conducting human health risk screening for the analytical results and preparing the report. The draft report is expected to be submitted to the Army for review in late November.

**Vapor Intrusion (VI) Study**

Mr. Holmes stated the VI Sampling and Analysis Plan (SAP) was submitted for regulatory review on 13 October. Comments are due on 12 December.

**DUNN FIELD**

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

Mr. Pannell stated October was an “on” month for the AS/SVE system, with all wells operating. On 18 October, a problem with the system computer prevented remote connection or obtaining system operations data. The system continues operating and readings can be viewed for the AS compressor and SVE blowers. A consultant is scheduled to examine the system computer/software later this week. For now, the AS/SVE system is continuing on full operation, despite November being an “off” month.

Mr. Pannell noted Dunn Field was mowed on 17 October.

**AS/SVE Reporting**

The Year 11 Annual Report was submitted for regulatory review on 2 November; comments are due on 2 January.

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**LONG TERM MONITORING (LTM)**

Mr. Millar introduced discussion regarding the letter Mr. Martinez Torres sent on 1 November concerning the 2021 LTM report, and specifically about influence of the Allen Well Field on groundwater flow, contaminant migration and additional remedial action. Mr. Martinez Torres noted that Diedre Lloyd of the EPA had submitted comments for the Supplemental Remedial Investigation (SRI) report regarding groundwater flow and contaminant migration. He questioned whether uncertainty about these issues would affect the estimate of the time required to meet the remedial action objectives. Mr. McRae stated that potential uncontrolled migration through the aquifers [fluvial deposits (FDAQ), intermediate (IAQ) and Memphis (MAQ)] would affect the proposed remedies.

Mr. Holmes stated that he does not believe there is uncertainty about groundwater flow. Groundwater in the FDAQ flows onto the MI, and it flows west across Dunn Field. The FDAQ is connected to the IAQ via the sink and the window on the MI, and to the MAQ via the IAQ in the window. Mr. Holmes said there is potential for plume migration through the window, but the concentrations in the IAQ and MAQ are low due to remedial actions to date and describing it as uncontrolled migration is an overstatement.

Mr. Holmes said the groundwater flow of the FDAQ is toward the window or the sink. That flow might be north, east, south, or west, depending on the specific location on the site, but the groundwater elevation contours and flow directions are not in question. Groundwater pumping and treatment was considered in the FFS but was not carried through as a component of the recommended remedy due to limited success when it was used as the interim remedy on Dunn Field.

Mr. McRae asked if the groundwater flow was natural or if it has been influenced in any way. Mr. Holmes responded that the only influence has been from pumping in the MAQ for water supply beginning in the 1880s; drawdown was increased as other well fields were developed, including the nearby Allen Well Field opening in the early 1950s. In addition, estimates for the time required to meet RAOs are included in the FFS.

Mr. Martinez Torres said he would like a letter replying to the questions in the letter; it doesn't have to be very detailed. Mr. Millar agreed to send such a letter.

Mr. Holmes said there was a comment in the 1 November letter about 'onsite plume migration from presumed upgradient sources'. He stated the two areas with plumes coming on to the MI are supported based on groundwater gradients and offsite concentrations.

Ms. Roebuck noted that the LTM report was intended to present the semiannual sampling results. It was not intended to address the questions of groundwater flow. Mr. Millar agreed, but added that these questions have been lingering and if it is possible to resolve the questions with a letter, he would like to do so.

Mr. Holmes stated that the 2022 LTM sampling event in October was completed with all planned samples collected and received at the laboratory.

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**OFFSITE INVESTIGATIONS**

Mr. Holmes said the Offsite Groundwater Investigation Revision 1 was submitted in October. At present, the Army does not plan any further action. During the October onsite meeting, there was discussion that EPA and TDEC might perform vapor intrusion sampling. Mr. Martinez Torres stated the sampling is being discussed within EPA.

Mr. Holmes stated that a reply to EPA's letter reviewing Army responses to comments on the Dunn Field West Post ROD Supplemental Investigation report is being prepared by the Army Environmental Legal Division (ELD). Revised text for the report based on the responses has been submitted to EPA.

The ELD is also reviewing the Environmental Condition of Property (ECP) and the Finding of Suitability to Transfer (FOST) amendment. ELD will also provide recommendations for Dunn Field decision document modifications.

**OTHER ISSUES**

Mr. Holmes said that the Fifth Five-Year Review Revision 0 was submitted for regulatory review on 9 September [this was mistakenly typed as 9 October in the September call summary]. Comments are due this week. Mr. Martinez Torres said he would submit comments later today, including comments from EPA Headquarters.

Mr. Holmes said 2023 Site Management Plan (SMP) is being reviewed by Army. Revision 0 of the SMP is scheduled to be submitted for regulatory review on 1 December.

Mr. Holmes stated that the Annual Site Inspection Revision 1 was submitted on 24 October with EPA's approval letter dates 14 October. EPA sent a second approval letter on 2 November with minor text changes. Mr. Holmes said that, in lieu of revising the Revision 1 report, he would like to record the EPA letter in the Administrative Record/Information Repository (AR/IR) as a separate entry. Mr. Martinez Torres agreed.

Mr. Holmes said there were no calls on the Community Information Line in October or to-date in November. The Golf Course manager inquired about stocking the lake for fishing. HDR referred the Golf Course manager to the online AR/IR (<https://ww3.sam.usace.army.mil/DDMT/>), specifically to the Remedial Investigation reports. Mr. Holmes said that further research and deed review might be needed to resolve the inquiry.

Mr. Holmes stated that the former cafeteria tenant contacted the property manager to ask for the well results for the well on their property. HDR informed the person that the most recent LTM results were below Maximum Contaminant Levels (MCLs) and directed the person to the LTM reports available via the online AR/IR.

Mr. Holmes noted that draft articles and graphics have been approved for the annual newsletter, EnviroNews. The mailing list has been updated, with the number of addresses increased from approximately 2,800 to 5,700 people in the DDMT area. The newsletter is scheduled to be mailed in mid-December. The AR/IR website will be updated in December; this will allow staff training on uploading new files as the current person responsible is leaving.

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Mr. Holmes raised the topic of the document tracker, noting that there were no action items. Mr. Martinez Torres said that he would like a point of contact information for ELD to provide to the EPA legal department. The two legal departments can discuss issues and streamline resolution. Mr. Millar said he would pass that information along.

Ms. Shirley said that she and Mr. Carter have reformatted the document tracker to improve the sorting function. Sorting by column will make it easier to see at a glance which documents are still in review. USACE will maintain the document tracker and will send it to Mr. Millar in time to be submitted with the agenda for the monthly SMT meeting.

Mr. Martinez Torres introduced Mr. Koporec, a risk assessor at Region 4, and asked that he be added to the distribution. Mr. Koporec stated he had reviewed risk assessments in several documents for DDMT. He will check the agendas and join the calls when risk assessment would be discussed and he was available

**UPCOMING FIELDWORK**

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Quarterly Monitoring	TBD Dec 2022
HDR	LTM Semiannual Sampling	TBD Apr 2023

Prioritized List of Documents for Regulatory Review

Responses to Comments

None

Reports

1. Fifth Five-Year Review (9 Sep 2022) (EPA, TDEC)
2. 2022 MI Focused Feasibility Study Report (30 Sep 2022) (EPA, TDEC)
3. 2022 VI Sampling and Analysis Plan (13 Oct 2022) (EPA, TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA reply (29 June 2022) to RTCs on DFW Post-ROD Supplemental Investigation Report

The next meeting will be held via Webex on Tuesday, 13 December, at 11:00 am EST, 10:00 am CST.