

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
13 DECEMBER 2022
11:00 EST**

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

MAIN INSTALLATION (MI)

No remedial action at the MI.

Focused Feasibility Study (FFS)

Mr. Holmes stated the FFS Revision 0 was submitted for regulatory review on 30 September. EPA requested a 20-day extension; comments are now due on 18 December.

Human Health & Ecological Risk Assessment (HHERA) Sampling

Mr. Holmes said the HHERA data validation is complete and the report is being prepared.

Vapor Intrusion (VI) Study

Mr. Holmes stated the VI Study Revision 0 was submitted for regulatory review on 13 October, and comments are due. Mr. Martinez-Torres said he would request a 20-day extension; comments will be due at the beginning of 2023.

DUNN FIELD

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

Mr. Pannell stated November was an 'off' month for the AS/SVE system. All AS wells, except AS 91 through AS 95, were turned off 8 November. The computer is still not communicating remotely, but the system is operating. With assistance from a subcontractor, all AS wells will be turned on for December, an 'on' month.

Mr. Pannell said the system is generating condensate typical for this time of year. Condensate liquid was transferred to the Dunn Field storage tank on 3 and 17 November and 5 December.

Annual preventative maintenance commenced on 10 November, at which time it was discovered that Blower 2 was not operating. Mr. Pannell said that the blower might have seized, which would require repair or replacement. He is waiting for a quote from Kaiser for inspection. In the meantime, the system is operating properly with only Blower 1.

Property Transfer

Mr. Millar recently met with Environmental Law Division (ELD) regarding the need for additional actions for Dunn Field West (DFW). The current view is that an Explanation of Significant Differences (ESD) does not appear to be necessary because the Dunn Field Record of Decision (ROD) includes a

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remedial action objective (RAO) for prevention of VI and notification to property owners. Mr. Millar requested EPA review the ROD to decide if they concur.

Mr. Millar said he will meet with ELD again in the coming week regarding EPA's review of Army responses to comments for the Dunn Field West (DFW) Post-ROD Supplemental Investigation Report, particularly the first comment in the review (requesting additional soil gas evaluation be conducted between the residences and CVOC plume). He noted the need for more team discussion about rebound in concentrations for two wells (MW-87 and MW-06) on the west side of DFW.

Discussion with ELD included the potential need for additional offsite wells to provide additional groundwater data between Dunn Field and houses on Rozelle Street west of Dunn Field. EPA assistance in obtaining access may be requested. Mr. Millar asked if HDR had difficulty obtaining access to those wells during the last sampling attempt. Mr. Holmes answered that there was no difficulty with access to existing wells for sampling, but a previous request for access for new well installation was not granted. Ms. Shirley located and forwarded the email chain from Joan Hutton (former Calibre BEC) and Jay Snow of Belz regarding well access.

Mr. Holmes displayed a map (Figure 13 CVOC Concentrations in Groundwater from *Dunn Field West Post-ROD Supplemental Investigation Report*) showing the area; the attached figure has been revised to include an aerial photograph of the area. Mr. Martinez Torres asked about the contamination in that area. Mr. Holmes answered that the groundwater contamination is slightly above target concentration for 1,1,2,2 tetrachloroethane at offsite well MW-184. Soil contamination is limited to Dunn Field, based on the DFW investigation. Mr. Millar asked if vapor sampling points are located—or were located in the past—along the fence line. Mr. Holmes replied there have been no vapor sampling points along the fence line. Mr. Millar said that the Army could install vapor monitoring points (VMPs), and if VMP sample results did not exceed VISL criteria, that would indicate offsite VI from contaminated soil onsite is unlikely. Mr. Millar noted this would require funding and further planning. Mr. Foster asked the USACE to prepare an estimate.

Mr. Martinez Torres said that EPA has been directed by Executive Order to prioritize environmental justice (EJ) issues. Based on his review of aerial photographs, the Rozelle Street area meets conditions for EJ requirements. He asked if past investigation had determined whether well water was used in the area. Mr. Holmes answered he was not aware of any contacts or detailed survey for residential wells. Memphis Light, Gas and Water (MLGW) supplies water to the entire city and installation of drinking water wells within the shallow aquifer is prohibited.

Mr. Bentkowski said that Steve Spurlin of the EPA would be in Memphis the first week of January to conduct vapor sampling at the northeast corner of Dunn Field. He said there is a conflicting evaluation of groundwater contamination between vapor intrusion screening levels (VISL) and the Johnson and Ettinger model. He said soil gas and crawl spaces would be sampled. Mr. Holmes said vapor sampling had been performed in 2009 prior to operation of the AS/SVE system to determine if VI was an issue based on the higher CVOC concentrations in groundwater at that time. He agreed to forward the report to Mr. Bentkowski.

Mr. Millar expressed hesitation to sample people's homes given that positive samples could be due to the residents' own activities. He would prefer to perform soil gas sampling across the area, either passive or active vapor sampling, in order to evaluate whether sampling in residences was necessary.

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Mr. Holmes noted the presence of only a few CVOCs at low concentrations in groundwater in offsite wells and asked Mr. Woods if there was contamination in the Fluvial Deposits Aquifer (FDAQ) across the Memphis area. Mr. Woods confirmed that there was and that historically when TDEC has encountered low level contamination in groundwater, vapor intrusion is not a concern except where a soil source for the contamination is present.

Mr. Martinez Torres said he would like to have further discussion with the Army, Mr. Bentkowski, and Mr. Koporec on this issue. He reiterated that protection of EJ communities is a priority for the EPA.

Mr. Woods said the state would prefer lines of evidence to justify sampling inside people's houses and that the state would not insist on sampling in someone's home against the homeowner's decision.

Mr. Millar said he thinks further discussion between EPA and the Army would be a good idea. He asked Mr. Foster if ELD should be included. Mr. Foster recommended talking with ELD first, and then scheduling a discussion with EPA. Mr. Foster expressed concern over sampling in residents' homes due to the fear that could be raised among residents and in the community. He would recommend multiple rounds of sampling prior to in-home sampling.

Mr. Millar said he would like to have a recent aerial photo overlaid with the plume locations, in order to depict the plume location in respect to the houses on Rozelle Street.

Mr. Martinez Torres asked if, over the next year, data could be collected to show that there are no wells being used for drinking water in the affected area. Mr. Woods stated that there is a Shelby County regulation against private wells, and any historic wells must be closed unless permitted by the Shelby County Health Department. Mr. Martinez Torres asked if anyone has assessed that no one is drinking well water. Mr. Holmes said that MLGW could be asked how many houses in the area have active water hookups to assess whether residences are using a different source than MLGW.

Mr. Foster stated he believes that this is an unfair request of Army. It is not an Army responsibility to investigate private property to determine if a resident is breaking county or city ordinances. Mr. Martinez Torres said Army has a duty to inform the community, and his question was if the Army has informed the community to not drink the groundwater. Mr. Woods said the Land Use Control document would state as much. Mr. Bentkowski said the information from vapor sampling in the residential area northeast of Dunn Field should be available in January or February and that would provide useful information for the VI potential in the affected area west of Dunn Field.

Mr. Bentkowski said he has sent his comments on the FFS to Mr. Martinez Torres, who will forward the comments to the Army. His comments include natural attenuation is not documented for individual plumes, MAQ wells MW-254 and MW-255 have increasing concentrations of volatile organic compounds which are leaving the installation and migrating toward the Allen Well Field, and treatment systems are not extensive enough to treat the plumes. Mr. Millar said the Army looks forward to receiving the comments.

LONG TERM MONITORING (LTM)

Mr. Holmes stated the Annual LTM Report-2021 Revision 1 was submitted at the end of November. Data validation for the October 2022 LTM sampling event is complete and work on the 2022 annual report is continuing.

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OTHER ISSUE

Mr. Holmes said responses to EPA comments on the Fifth Five-Year Review Revision 0 were submitted on 5 December. He recalled that Mr. Martinez Torres had stated on a previous call that EPA would submit additional comments and noted that new comments would likely require an extension for completion of the FYR. Mr. Martinez Torres said there would likely be additional comments from EPA but that they would work to meet the completion deadline.

Mr. Holmes stated the 2023 Site Management Plan (SMP) Revision 0 was submitted at the end of November. Comments are due at the end of December.

Mr. Holmes said there were no community calls on the Community Information Line since the SMT meeting in November. The annual newsletter, EnviroNews, was mailed 9 December. Mr. Millar confirmed he had received his copy. Digital copies were submitted to SMT members on 7 December.

Mr. Holmes said the indexes for the Administrative Record (AR) / Information Repository (IR) will be updated early in 2023, after which the website (<https://ww3.sam.usace.army.mil/DDMT/>) will be updated. He noted AR and IR compilation computer discs (CDs) would be made, but acknowledged that most team members no longer use CDs. Mr. Woods asked that compilation updates be sent to him.

UPCOMING FIELDWORK

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Monitoring	TBD Feb 2023 & Apr 2023
Leidos	PFAS Site Inspection	TBD Mar 2023
HDR	LTM Semiannual Sampling	TBD Apr 2023

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Responses to EPA Comments on Fifth Five-Year Review (Sep 2022) (submitted 5 Dec 2022)

Reports

1. 2022 MI Focused Feasibility Study Report (30 Sep 2022) (EPA, TDEC)
2. 2022 VI Sampling and Analysis Plan (13 Oct 2022) (EPA, TDEC)
3. Off Depot Air Sparge/Soil Vapor Extraction System, Annual Operations Report, Year 11 (2 Nov 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 team agreed to hold the next meeting on the third Tuesday of January. It will occur via Webex on Tuesday, 17 January, at 11:00 am EST, 10:00 am CST.

Document Path: W:\MW87\Dunn Field West Investigation Report\13_CVOC_GW.mxd

