

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**

17 JANUARY 2023

11:00 EST

Army, Base Realignment and Closure Division (DAIN-ISE [BRAC]): Jay Foster

Army, Environmental Legal Division: Sue Ryan

CALIBRE BEC: Bill Millar

U.S. EPA, Region 4 RPM – Fernando Martinez Torres; Support – Ben Bentkowski; Kevin Koporec

TDEC Division of Remediation, DDMT RPM – Jamie Woods

USACE, Mobile – Bob Beacham (absent); Laura Roebuck, Melissa Shirley, Chase Carter

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Tom Holmes, Clayton Mokri, Nancy Jepsen

MAIN INSTALLATION (MI)

No remedial action at the MI.

Focused Feasibility Study (FFS)

Mr. Holmes stated that EPA comments on the FFS Revision 0 were received in mid-December. HDR is preparing draft responses that will be submitted to Army for review. Mr. Holmes added that TDEC approval on the FFS was received today.

Human Health & Ecological Risk Assessment (HHERA) Review Sampling

Mr. Holmes said the Sampling and Risk Screening draft report has been submitted to Army for review. Comments are expected at the end of the month. He expects the Revision 0 report will be submitted for agency review in the middle of February.

Vapor Intrusion (VI) Study

Mr. Holmes stated EPA comments on VI Study Revision 0 were received in early January. He said TDEC is still reviewing the report. HDR will prepare draft responses to comments after completion of the draft FFS responses.

DUNN FIELD

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

Mr. Pannell stated December was an “on” month for the AS/SVE system. There was a delay starting some wells due to the computer issue discussed during the December Site Management Team call. However, the system was in full operation with all wells from 13 to 30 December. Since 30 December, AS wells, except for AS 91 through AS 95, were turned off 30 December.

Mr. Pannell discussed maintenance issues for the AS/SVE system:

- The computer issue was successfully resolved on 14 December.
- Blower 2 has failed completely but the system is capable of operating with only Blower 1. At present, there are no plans to fix Blower 2, though the situation will be monitored.

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- The high flow switch on the AWS tank became stuck on 20 December. The switch was repaired on 21 December.

Mr. Pannell noted that comments have not been received for the Year 11 annual report submitted in November. Mr. Martinez Torres said that EPA had submitted comments on 5 January. Mr. Millar said he would check his email and forward the comments to Mr. Pannell. Mr. Woods said TDEC would submit comments by the end of the week.

Mr. Woods asked if increased condensate during winter was due to water infiltration or to the difference between groundwater temperature and the ambient outdoor temperature. Mr. Pannell responded that he believes it is mainly caused by the temperature difference. Mr. Holmes added that there has been water infiltration in periods of excessive rain, but he believes the temperature difference is the main cause for increased condensate generation in winter.

LONG TERM MONITORING (LTM)

Mr. Holmes stated HDR is preparing the draft Annual LTM Report-2022. He expects to submit it to Army for review at the end of January.

OTHER ISSUES

Mr. Holmes stated comments have not yet been received on the 2023 Site Management Plan (SMP) Revision 0 that was submitted at the end of November. Mr. Martinez Torres said the EPA is finalizing comments.

Mr. Holmes noted the only call on the Community Information Line this month was from a person asking to be added to the EnviroNews mailing list.

Dunn Field West Post ROD Investigation Report

Mr. Holmes asked if EPA has reviewed the Army's response sent 4 January in reply to the EPA letter reviewing the Army responses to comments on the DFW report. Mr. Martinez Torres said he had not responded yet. Mr. Holmes said that the work is completed and he would like to submit the Revision 1 report.

Mr. Martinez Torres asked if the Army intends to shut down the AS/SVE system this year. Mr. Holmes answered that yes, that is the plan. Mr. Martinez Torres said that groundwater cleanup levels have not reached the maximum contaminant levels (MCLs). Mr. Holmes replied that the ROD Amendment stated the active remediation goal is 50 parts per billion (ppb) for chlorinated volatile organic compounds (CVOCs), which has been met. Because that goal has been met, continuing operation of the AS/SVE system is not necessary; instead, monitored natural attenuation (MNA) will proceed until concentrations reach the MCLs. Mr. Holmes clarified that the system is still in the remediation phase, not the attainment monitoring phase, but that does not prevent shut down of the AS/SVE system.

Mr. Martinez Torres asked Mr. Bentkowski for his thoughts. He replied that attainment of groundwater remediation standards is not tied to a specific remedial activity and the guidance does not specify how the standards must be met. He said that if the Army has decided the AS/SVE has reached its

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maximum effectiveness, then MNA can be used, though he cautioned that the Army should have an idea of how long it will take. Mr. Millar said the EPA sent a letter in 2011 stating that 20 years would be the expected timeframe for MNA. Mr. Millar said he would forward that letter to Mr. Martinez Torres and Mr. Bentkowski.

Mr. Woods asked how many sampling events have returned concentrations below 50 ppb. Mr. Holmes replied that the initial sample with results below 50 ppb was from December 2021 and results from four additional samples through October 2022 have been below 50 ppb. There will be three more samples collected prior to the planned AS/SVE system shutdown at the end of July 2023. Compliance monitoring for one year is then planned.

Five-Year Review

Mr. Holmes said that Mr. Millar sent a table on 11 January to EPA with responses to review comments on the Five-Year Review along with a redline/strikeout version of the document. Mr. Holmes asked if EPA had a chance to review that email as completion of the FYR is planned for late January. Mr. Martinez Torres said he had not completed his review and that more data is required for the protectiveness determination regarding nearby residents. For clarification, Mr. Holmes asked if EPA would require additional work to be completed in order to close out the Five-Year Review, or if it is necessary only that the Army, EPA, and TDEC agree on what additional work is required. Mr. Martinez Torres said additional discussion is needed. With regard to the scheduled completion, he said the FYR is in his court now and that he would provide additional information.

Issues Discussion 21 February

The Site Management Team agreed to hold a special discussion for issues on 21 February at 11:00 am Eastern Standard Time. HDR sent a Webex invitation to Army, USACE, EPA, and TDEC attendees.

Mr. Millar asked Ms. Ryan if she would like to talk with the EPA lawyer before the meeting. Mr. Martinez Torres said that Martha Brock is the EPA lawyer for the DDMT site. Ms. Ryan said she will be meeting Ms. Brock later this week for a different topic and will discuss the possibility of a separate DDMT discussion at that time.

Mr. Martinez Torres said EPA will provide a letter before the meeting to explain EPA's position on issues.

Closing Items

Mr. Millar asked if results had been received for the EPA sampling north of DDMT. Mr. Martinez Torres said the sampling is complete, but lab results have not been received yet.

Mr. Martinez Torres said the document tracker needs to be updated. Ms. Shirley said she thought the tracker was updated for this meeting and asked attendees to email her with any items that should be added to the tracker. Mr. Martinez Torres agreed to send an email. He also suggested that the agenda for the monthly team meeting should contain a statement for each agenda item summarizing the current status.

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UPCOMING FIELDWORK

Contractor	Activity	Dates
KGS/Trinity	AS/SVE Monitoring	6 Feb 2023 & TBD Apr 2023
Leidos	PFAS Site Inspection	6 to 18 Mar 2023
HDR	LTM Semiannual Sampling	TBD Apr 2023

Prioritized List of Documents for Regulatory Review

Responses to Comments-Correspondence

1. Reply to Army Letter (4 Jan 2023) in reply to EPA letter (June 2022); responses to additional comments and RLSO text for the DFW Post-ROD Supplemental Investigation Report and Human Health Risk Assessment provided.
2. Reply to Army email (11 Jan 2023) in reply to EPA letter (5 Jan 2023); responses to additional comments and RLSO text for the Fifth Five Year Review provided.

Reports

1. Off Depot Air Sparge/Soil Vapor Extraction System, Annual Operations Report, Year 11 (2 Nov 2022) (TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA comments (18 Dec 2022) on 2022 MI Focused Feasibility Study Report (Sep 2022)
2. EPA comments (2 Jan 2023) on 2022 VI Sampling and Analysis Plan (Oct 2022)
3. EPA comments (5 Jan 2023) on Off Depot Air Sparge/Soil Vapor Extraction System, Annual Operations Report, Year 11 (Nov 2022)

The next meeting of the Site Management Team will occur via Webex on Tuesday, 14 February, at 11:00 am EST, 10:00 am CST.