

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
14 MARCH 2023
11:00 EDT

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

CALIBRE BEC: Bill Millar

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

TDEC Division of Remediation 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 current remedial action at the MI.

Focused Feasibility Study (FFS)

Army is reviewing draft responses to EPA comments submitted December 2022 and January 2023.

Human Health & Ecological Risk Assessment (HHERA) Review Sampling

The Sampling and Risk Screening Report Revision 0 was submitted for agency review on 15 February. Comments are due 14 April 2023.

Vapor Intrusion (VI) Study Sampling and Analysis Plan

Army submitted a red-line strike-out (RLSO) version and responses to EPA comments on 13 March. TDEC approval for the report was received 14 February 2023.

Mr. Holmes said that HDR is planning to begin passive sampling in May. Conducting the passive screening sampling in May will enable indoor air sampling to occur in July/August with a second round in December/January, which are the prime heating/cooling seasons.

DUNN FIELD

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

February was an “on” month with all scheduled AS wells operating. Mr. Pannell said the system was shut down several times in February due to heavy rain events. During heavy rains, the system produces a large quantity of condensate water; the condensate is transferred to a bulk storage tank on Dunn Field, where it is sampled and, upon receiving authorization, discharged to a stormwater drain per agreement with TDEC. Mr. Pannell said 1,500 gallons of condensate was collected and analyzed, with discharge occurring on 20-21 February. He said that the Memphis area is now warming up and condensate generation should be reduced through July.

TDEC approved the AS/SVE Year 11 Annual Report on 9 March. Mr. Pannell said that responses to EPA comments are being prepared and will be submitted in the next few days.

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Property Transfer of Dunn Field West

Post-ROD Supplemental Investigation Report: Revision 1 of the report is in preparation. Mr. Holmes said a draft work plan addendum is being prepared for the additional sampling discussed in February.

Mr. Millar asked if EPA would have additional comments or revisions on this report. Mr. Martinez Torres answered that Dunn Field West has priority in the EPA's review, and asked if there would be an update to the report. Mr. Holmes replied that Section 5, Conclusions and Recommendations has been revised to note the agency reviews, correspondence, discussion and plans for additional sampling; the responses to comments and correspondence will be included in an appendix.

Property Transfer Documents (ECP, FOST Amendment): Mr. Holmes said work on the ECP and FOST Amendment are temporarily on hold.

LONG TERM MONITORING (LTM)

The Annual LTM Report-2022, Revision 0 was submitted for regulatory review on 8 March.

Mr. Holmes said that early sampling of LTM wells was performed in early March in order to have the wells available for PFAS sampling. PFAS sampling should be underway at present. Sampling of the remaining designated LTM wells will occur 5–12 April.

OTHER ISSUES

Fifth Five-Year Review: The BRAC Environmental Law Division is preparing a letter replying to EPA's letter dated 24 January and considering final revisions to the Fifth Five-Year Review.

2023 Site Management Plan: Revision 1 of the SMP is in preparation. Mr. Holmes requested Mr. Martinez-Torres complete review of the revised text and schedule submitted 7 March in order for the SMP to be completed in a timely manner.

Community Information Line: There have been no calls since the February 2023 Site Management Team meeting.

Administrative Record (AR)/Information Repository (IR): Mr. Holmes said final documents for the AR will be submitted to the Washington National Records Center this spring; he is waiting to include key documents such as the Five-Year Review, Dunn Field West Report, and the Site Management Plan in order to have them available for public review.

Mr. Martinez Torres said that as the Army moves forward with vapor sampling to evaluate potential risk for the properties near Rozelle Street, the data may prompt an amendment. He asked if there had been a previous Record of Decision (ROD) Amendment for Dunn Field West. Mr. Millar answered that there have been revisions to the Dunn Field ROD over time. Mr. Millar thanked Mr. Martinez Torres for the additional information about Applicable or Relevant and Appropriate Requirements (ARARs).

Mr. Martinez Torres asked if information could be sent to him about the crash that occurred at DDMT, specifically information about the fire-fighter actions and whether PFAS was used? Mr. Holmes said he believes that will be included in the upcoming PFAS report, which is not yet available.

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DOCUMENT AND ACTION ITEM TRACKING FORMS

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. EPA review of 2023 SMP final revisions submitted 7 March 2023.
2. EPA review of Army responses and revisions to the VI SAP submitted 13 March 2023.

Reports

1. Sampling and Risk Screening Report (15 Feb 2023)
2. Annual LTM Report-2022 (7 Mar 2023)

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA comments (18 Dec 2022 & 17 Jan 2023) on 2022 MI Focused Feasibility Study Report
2. EPA comments (28 Dec 2022) on Off Depot AS/SVE Year 11 Annual Report

UPCOMING FIELDWORK

Contractor	Activity	Dates
Leidos	PFAS Site Inspection	6 to 16 Mar 2023
HDR	LTM Semiannual Sampling	5 to 12 Apr 2023
KGS/Trinity	AS/SVE Monitoring	4 Apr 2023

The next meeting of the Site Management Team will occur via Webex on Tuesday, 11 April, at 11:00 am EDT, 10:00 am CDT.