

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
13 JUNE 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 (absent), Kevin Koporec

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 (absent)

HDR EOC: Tom Holmes, Nancy Jepsen; Clayton Mokri (absent)

MAIN INSTALLATION (MI)

No current remedial action at the MI.

Focused Feasibility Study (FFS)

Mr. Holmes stated that the Army submitted responses to comments and redline-strikeout text for the FFS to EPA this morning. HDR will continue preparing the draft Revised Proposed Plan during EPA's review of the FFS.

Human Health & Ecological Risk Assessment (HHERA) Review Sampling

On 2 June, Army submitted responses to EPA comments on the HHERA Review Sampling – Screening Sampling and Risk Report Revision 0. Mr. Woods said he would submit TDEC comments for the report within the next two days.

Vapor Intrusion (VI) Study Sampling and Analysis Plan (SAP)

Mr. Holmes said the initial 98 samplers were installed and retrieved over the past few days. Samplers were delivered to Beacon this morning for analysis. Follow-up sampling, which will be based on results from this initial sampling, will occur in late July.

DUNN FIELD

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

May was an "off" month with only AS wells 91 through 95 operating. Mr. Pannell said AS wells 1 through 42 operated from 16 May to 23 May, as is normal during an off month.

Mr. Pannell stated that semiannual maintenance for the blower is scheduled for 27 June.

Mowing of the AS/SVE compound was completed 9 June, and Dunn Field will be mowed the last week of June. Mr. Pannell was informed on 30 May that neighbors had complained to City of Memphis code enforcement about the height of the grass at the AS/SVE compound. Mr. Pannell spoke with the code enforcement officer and learned that city of Memphis has a requirement that grass be kept no higher than 12 inches. This applies to the AS/SVE compound; however, Dunn Field is exempt from the requirement because of its acreage. Mr. Martinez Torres recommended

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maintaining a regular mowing schedule so as to maintain good relationships with the neighbors and community stakeholders. Mr. Pannell agreed.

Mr. Pannell raised a question about an EPA comment on the Draft Year 11 Annual O&M Report. The comment concerned the ratio of air removed to volume of air injected into the AS/SVE system. The report had indicated that the amount of air removed is usually 3 to 4 times the amount of air injected, but during Year 11 the ratio was 4.8. Mr. Pannell said that there were several possible reasons why the ratio might increase but said that none of the reasons are significant from a technical perspective. He added that the Year 12 ratio, as of last week, is 4.0. Mr. Martinez Torres asked that a one or two sentence clarification be added to the report explaining that the ratio is within expected operating parameters so that future stakeholders reading the report will not be concerned.

Property Transfer

HDR is preparing the Dunn Field West Vapor Intrusion (VI) SAP; submittal of the draft to Army is expected in the next few weeks.

Mr. Millar said that BRAC is working with the attorneys to resolve a few issues. Once that is complete, the process for property transfer will resume.

LONG TERM MONITORING (LTM)

Army's responses to EPA comments on the Annual LTM Report-2022, Revision 0, were submitted 24 May. TDEC approval of the report was received 16 May.

The April LTM sampling event is complete, and the data report is near completion. Mr. Holmes said there were no major differences in the analytical results based on comparison to previous results.

OTHER ISSUES

Fifth Five-Year Review (FYR), Revision 1 is complete. Official notice will be published in the *Commercial Appeal* on 14 June.

Mr. Martinez Torres requested a letter describing status of activities to address recommendations in the FYR be provided every six months. He will submit this letter to EPA headquarters to keep them informed on achieving those recommendations.

Mr. Millar noted that with regard to the AS/SVE operations, the system will be shut down at the end of July. Monitoring for increased contaminant concentrations in the AS/SVE area will be conducted during semiannual LTM events. If increased concentrations are not observed in two years; the system will be permanently closed with equipment removed and SVE and AS wells abandoned. If increased concentrations are observed, the need for further action will be discussed with EPA and TDEC. Likewise, grass mowing will continue and Ms. Denise Cooper (HDR) will observe the physical condition of the system monthly to verify that no damage has occurred.

2023 Annual Land Use Controls Site Inspection: Mr. Holmes said site inspection, well survey and contacts with property owners and Shelby County Water Quality Branch had been completed; the draft report is being prepared.

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Community Information Line: No calls were received since the May Site Management Team meeting.

Administrative Record (AR)/Information Repository (IR): Annual updates of AR and IR indexes have been submitted to EPA and TDEC. AR/IR compilation discs have been sent to TDEC, and the DDMT website has been updated (<https://ww3.sam.usace.army.mil/DDMT/>) . The AR submittal to Washington National Records Center for long-term retention is in progress.

Golf Course: The Golf Course Manager has requested Tennessee Wildlife Resources Agency stock Lake Danielson for catch-and-release fishing. Mr. Holmes said the property is approved for recreational use. Mr. Koporec asked if the catch-and-release restriction is due to contamination from DDMT or if there was a different reason. Mr. Holmes said he did not know the reason for the restriction but said it was reasonable as the lake is within the boundaries of a Superfund site. Ms. Shirley added that it might be a standard restriction for a lake on a golf course, given the likely use of pesticides or fertilizers on the course. Mr. Woods stated that other Superfund sites he works with also restrict fishing to catch-and-release simply due to being on a Superfund site. He added that Shelby County Health Department could be requested to perform tissue samples on fish, if contamination is a concern.

DOCUMENT AND ACTION ITEM TRACKING FORMS

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Annual LTM Report-2022 EPA RTCs and RLSO submitted 24 May.
2. Sampling and Risk Screening Report EPA RTCs and RLSO submitted 2 June.
3. 2022 MI Focused Feasibility Study Report EPA RTCs and RLSO submitted 13 June.

Reports

1. Sampling and Risk Screening Report (Feb 15, 2023) (TDEC)

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA concurrence for Off Depot AS/SVE Year 11 Annual Report RTCs; clear copy requested.

UPCOMING FIELDWORK

Contractor	Activity	Dates
HDR	Additional Passive VI Sampling	TBD July

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