

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

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

CALIBRE BEC: Bill Millar

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

Mr. Martinez Torres stated that EPA would soon confirm a new Division Director; he expects to announce the confirmation during the August SMT call. Mr. Martinez Torres said changes to environmental justice standards are being implemented at Tyndall Air Force Base and may be required at other DOD sites.

MAIN INSTALLATION (MI)

No current remedial action at the MI.

Focused Feasibility Study (FFS)/Revised Proposed Plan (RPP)

Mr. Holmes stated responses to EPA comments for the FFS were submitted 13 June and the new Appendix B, Supplemental Information was submitted 22 June. EPA's response is expected by 22 July. The draft RPP has been submitted for Army review. The RPP is based on the FFS, so any changes to the FFS will be incorporated into the RPP.

Human Health & Ecological Risk Assessment (HHERA)

EPA's review of the response to comments on the Sampling and Risk Screening Report, Revision 0 was received on 7 July. Mr. Holmes said that he is working with the risk assessors to prepare a draft response to the review comments for Army review.

Vapor Intrusion (VI) Study

The initial passive vapor sampling analysis has been completed. Mr. Mokri presented a table of the analytical results for 25 volatile organic compounds (VOCs). He stated that only carbon tetrachloride (CT), chloroform (CF), tetrachloroethene (PCE), trichloroethene (TCE), benzene, and naphthalene were detected above residential vapor intrusion screening levels (VISLs) and only CF, PCE, and TCE were detected above commercial VISLs.

Mr. Mokri presented a figure showing the site-wide grid samples with analytical results. He noted that for the samples collected in or near the housing area, only one sample (PV-58) had VOCs above the limit of detection. The VOC was toluene and was below the residential VISL.

Mr. Mokri discussed results at the target treatment areas, where commercial VISLs were exceeded in five samples at TTA-1 and one sample at TTA-2. Follow-up samples will be collected around these sample locations to delineate the extent of VOC concentrations. Eight repeat samples will be collected

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at locations where water was observed in the boring during sampler retrieval. Furthermore, up to 20 sewer line and utility line backfill samples will be collected.

Mr. Bentkowski mentioned a VI study that used passive samplers in the sewer near areas of higher concentrations. He said the study showed that compounds in the groundwater had migrated into the sewer lines. A follow-up action for that survey will be to test the nearby residences to determine if the compounds have migrated through the lateral sewer lines into the neighborhood. He asked if sewer line samples will be placed at DDMT near the highest soil gas values. Mr. Mokri said that sewer line samples are planned at TTA-1 and TTA-2 in August during the follow-up passive vapor sampling.

Mr. Koporec asked if any additional residential areas on the installation were sampled. Mr. Mokri answered that the housing area discussed above is the only residential area on the installation. He said there are offsite residential areas to the south and west of the installation, but this study was focused on the installation. Mr. Holmes said groundwater flow in the FDAQ is onto the MI from all sides and that VI sampling above offsite plumes is not planned.

Mr. Martinez Torres asked about PV-59, specifically if that is where the contamination is coming onto the site. Mr. Holmes replied that offsite contamination is coming onto the MI at TTA-1 North, to the north of PV-59. He also noted that the highest concentration in TTA-1N PV samples is TCE, yet the highest concentration in groundwater is PCE. He said this indicates that a source of TCE contamination is likely onsite, with the PCE source offsite.

Mr. Martinez Torres asked how the offsite contamination will affect the future remedy. Mr. Holmes responded that the Army has not selected the preferred alternative. Two alternatives include AS/SVE along the boundary to intercept the two plumes coming onsite. Mr. Holmes said that if there is not a VI impact in buildings on the MI from groundwater plumes, then VI will not be a reason to continue the AS/SVE system; at that point, the only concern will be potential impact of the contamination to the Memphis Aquifer.

DUNN FIELD

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

Mr. Pannell stated that June was an "on" month with all AS wells operating. Bi-monthly monitoring activities were conducted on 6 June.

Condensate water was transferred three times in June, totaling 2,450 gallons. Two additional transfers have been conducted in July, totaling 1,500 gallons. The condensate is attributable to rain and humid conditions in Memphis.

Kaiser performed preventive maintenance on Blower 1 on 30 June. The compound was mowed on 9 June and Dunn Field was mowed on 7 July.

The Year 11 Annual Report Revision 1 will soon be submitted, incorporating the responses to EPA comments.

Mr. Pannell said July is an "off" month with only AS wells 91 through 95 operating, and the AS/SVE system is scheduled to be shut down completely at the end of July. However, on 17 July, remote monitoring showed no air flow to the AS wells from the air compressor. Ms. Cooper (HDR) inspected

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the system on 18 July, with Kaeser's assistance, and found that the air end motor drive coupling was damaged. Kaeser will submit a quote for repair.

Mr. Martinez Torres asked if the air compressor problem will affect data collection necessary for shutdown. Mr. Pannell answered that it will not affect the intended shutdown; July was scheduled to be an "off" month with only AS wells 91 to 95 operating and the effect will be minimal.

Mr. Holmes said that a groundwater sample at MW-159 was collected in June. The TCE concentration, at 30 ppb, remained below the 50 ppb target for active remediation.

Property Transfer

HDR submitted the draft Dunn Field West VI SAP for Army review on 5 July.

Mr. Millar said that BRAC is working with the attorneys to prepare a draft letter on the six-month update of activities to support the protectiveness determination in the Five-Year Review. Further progress on the property transfer documents is dependent on attorney availability.

LONG TERM MONITORING (LTM)

HDR received EPA's review of Army responses to comments for the Annual LTM Report-2022, Revision 0 on 7 July. The review suggested Revision 1 include a website link to allow public access to the report and other referenced documents; the review also requested further discussion of LTM sample frequency. Army submitted a reply memo on 11 July agreeing to add the website link and discussion of sample frequency. Mr. Holmes said discussion of sampling frequency would be appropriate during preparation of the 2024 Annual LTM Report. Mr. Martinez Torres said EPA is still considering what sample frequency guidance would be the best for DDMT.

OTHER ISSUES

Fifth Five-Year Review (FYR), Revision 1: Public notice of the FYR was published in the *Commercial Appeal* on 14 June.

Mr. Holmes said there would be no further action on the FYR until the addendum is prepared and asked if EPA has guidance for FYR addenda. Mr. Martinez Torres said he would check for guidance documents, but in general, the addendum is to address the concerns resulting in EPA's independent determination of deferred protectiveness. He said that once EPA agrees the goals can be reached, then management can make the determination.

Mr. Martinez Torres asked if there was progress on the scope of offsite investigation. Mr. Holmes answered that the Dunn Field West VI SAP is being prepared to describe the proposed sampling, as discussed during a previous SMT call.

2023 Annual Land Use Controls Site Inspection: Mr. Holmes said the draft report was submitted for Army review on 6 July.

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

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Administrative Record (AR)/Information Repository (IR): Recent AR documents were delivered to the Washington National Records Center on 3 July.

DOCUMENT AND ACTION ITEM TRACKING FORMS

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. 2022 MI Focused Feasibility Study Report. Responses to comments (RTCs) and redline/strikeout document (RLSO) submitted 13 June; Appendix B submitted 22 June.

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA concurrence for Off Depot AS/SVE Year 11 Annual Report RTCs. Revision 1 to be submitted.
2. EPA Review of Annual LTM Report-2022 RTCs and RLSO received 7 July. Revision 1 to be submitted.
3. EPA Review of Sampling and Risk Screening Report RTCs and RLSO received 7 July.

UPCOMING FIELDWORK

Contractor	Activity	Dates
HDR	Follow-up Passive VI Sampling Install-Retrieval	TBD August 2023
HDR	LTM	TBD October 2023

The next meeting of the Site Management Team will occur via Webex on Tuesday, 8 August, at 11:00 am EDT, 10:00 am CDT.