

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
12 SEPTEMBER 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 – 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
HDR EOC: Tom Holmes, Clayton Mokri, Nancy Jepsen

GENERAL

Mr. Millar asked if anyone on the call had something to discuss before the agenda items. Mr. Martinez Torres said that he submitted his review of the 2023 Annual Site Inspection, Revision 0 earlier that morning.

MAIN INSTALLATION (MI)

No current remedial action at the MI.

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

The EPA review of responses to comments for the FFS was received on 11 August. Mr. Mokri said a response to EPA comments is being prepared. The RPP will be finalized after the FFS comments have been resolved.

Human Health & Ecological Risk Assessment (HHERA) Review Sampling

A response to EPA comments with a revised redline-strikeout (RLSO) version of the report was submitted to regulators on 21 August.

Vapor Intrusion (VI) Study

Mr. Mokri said that passive soil vapor samplers were deployed on 4 - 8 August and collected on 22 and 23 August. HDR received the lab results last week and is preparing the Passive Vapor Sampling report. The results will be discussed during the October Site Management Team call. Mr. Mokri said the next step will be installing vapor monitoring points (VMPs) for the active sampling.

DUNN FIELD

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

Mr. Pannell stated that AS/SVE system was shut down at the end of July and the compressor was repaired so that it is available if the system is ever brought back online.

Mothballing activities were performed on 24 August. Mr. Pannell explained that each month the compressor and Blower 1 will be isolated from the subsurface and operated for a short period of time to lubricate and maintain the equipment.

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Mr. Pannell said the AS/SVE area was mowed on 6 September, and Dunn Field is scheduled to be mowed on 25 September.

The Year 12 Annual Report is in preparation. The Year 11 Annual Report Revision 1 was submitted 21 July, and Mr. Pannell said EPA comment or approval of the report is needed.

Property Transfer

Mr. Millar said Army is considering removing approximately 2.5 acres of Dunn Field West from the conveyance of the larger property to conduct soil remediation and soil vapor extraction of the hotspot on the west side of the property. The goal of the carveout is to enable conveyance of the remainder of the parcel. Once the cleanup is finished, the 2.5 acres would be conveyed to the purchaser. Mr. Millar said a survey and legal description of the 2.5 acres would be obtained.

Mr. Foster said this would be beneficial since it allows continued work on the contamination issues. He noted there is great interest from the community for the property and that 40 qualified bidders have already contacted General Services Administration (GSA). Mr. Millar said the Finding of Suitability to Transfer (FOST) Amendment and the Environmental Condition of Property (ECP) would be revised to reflect the change in acreage.

Mr. Martinez Torres asked when the property transfer is expected to occur. Mr. Foster answered that it would likely be in the first quarter of 2024.

LONG TERM MONITORING (LTM)

The next monitoring event is scheduled for 11 through 20 October 2023. Mr. Mokri said 10 wells in the AS/SVE system area would be sampled. He said two wells in the area were already scheduled for sampling, and eight additional wells in the area were added to provide additional data for evaluating rebound after shutdown of the AS/SVE system.

OTHER ISSUES

2023 Annual Land Use Controls Site Inspection: EPA comments were received this morning.

2024 Site Management Plan: Mr. Mokri said Army has begun preparing the plan.

EnviroNews: The story list and schedule for the annual newsletter are being prepared.

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

Mr. Martinez Torres asked about the exceedances in samples in the Dunn Field area. He said that EPA requires eight samples before ceasing remedial action. Mr. Millar answered that there are some areas that achieved the remedial goal ($<50 \mu\text{g/L}$) for the AS/SVE system but are still above MCLs; these areas will be monitored until MCLs are reached. Once MCLs are reached the eight-sample process would begin. Until the MCLs are reached, there is no need to increase the sampling frequency.

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Mr. Mokri shared a diagram depicting the additional monitoring around the AS/SVE area (Figure 4, Performance Monitoring Well Location Map, from the Off Depot Groundwater Interim Remedial Action Completion Report). He said monitoring is being performed to evaluate rebound after AS/SVE system shutdown.

Mr. Millar said wells near MW-6 and in Dunn Field are placed in the “carveout” area, the acreage that would be removed from the property transfer. Mr. Millar said soil remediation would take place in the area followed by SVE.

Mr. Martinez Torres asked about groundwater flow. Mr. Holmes answered that the groundwater flow in the AS/SVE area is to the north. Mr. Martinez Torres asked, as clarification, if groundwater from MW-246 flowed toward MW-152. Mr. Holmes answered that the groundwater flows towards MW-79. Mr. Martinez Torres asked about MW-160, the highlighted well to the west of MW-241. Mr. Holmes said that the selected wells in this area had individual CVOCs above 50 µg/L prior to AS/SVE start-up but were currently below MCLs, except for MW-159. Mr. Holmes said that two wells to the east, towards Dunn Field, are above the MCLs but below the 50 µg/L target concentration and much lower than before.

Mr. Martinez Torres said he would like to see some temporary wells installed north of MW-160 and MW-243, toward MW-79. Mr. Holmes stated he did not see the value and suggested EPA provide the rationale for this additional work. Mr. Martinez Torres said that the groundwater flow is to the north from this area with recent exceedances. He said that eight samples are necessary to show that there is not a pattern of contamination. Mr. Martinez Torres said he would write a rationale if needed.

Ms. Shirley asked if Mr. Martinez Torres meant to reopen the Record of Decision (ROD). Mr. Martinez Torres replied that he is not suggesting reopening the ROD to conduct more investigation; instead, he would like additional data to be sure that there is no contamination beyond that point. Mr. Holmes said that any contamination beyond the AS/SVE system would be from the plume to the north that is coming from offsite, which was covered by the offsite investigation.

Mr. Martinez Torres said that for a professional evaluation it would be good to have at least one more well to be sure there are no exceedances.

Mr. Mokri pointed out that the area to the north of MW-160 is occupied by the Memphis Light Gas and Water (MLGW) substation. He said that access to safely install well(s) using a sonic drill rig may be limited.

Mr. Millar said he would ascertain if a drill rig could access the area and inform Mr. Martinez Torres.

Mr. Koporec asked about GSA’s involvement in the property transfer and asked about land use restrictions. Mr. Foster explained that GSA conducts the bidding process for the public sale of the parcel. He said at one point BRAC conducted public sales itself, but that was not a good use of resources. He noted the USACE also uses GSA for property transfer. Mr. Foster stated the environmental aspects and land use controls are the same regardless of what conveyance mechanism is used. Mr. Woods said that deed restrictions are recorded in the Shelby County Register’s Office. Mr. Holmes added that requirements of the Land Use Control Implementation Plan continue after property transfer; Army retains responsibility, and land use controls continue until the

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site meets requirements for unrestricted use. The information is provided in the Annual Site Inspection Report that was just reviewed by EPA.

Mr. Martinez Torres shared information from the DoD Guidance on The Environmental Review Process to Reach A Finding Of Suitability To Transfer (FOST) For Property Where Release Or Disposal Has Occurred.

Ms. Shirley said that Mr. Carter sent the document tracker to the Site Management Team members. If anyone identifies something that needs to change, please let Mr. Carter know.

DOCUMENT AND ACTION ITEM TRACKING FORMS

Prioritized List of Documents for Regulatory Review

Responses to Comments

1. Army reply to EPA Review of Sampling and Risk Screening Report response to comments and RLSO submitted 21 August.

Reports

1. Dunn Field West VI SAP Revision 0 submitted 15 August.

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA review of 2022 Main Installation FFS Report response to comments, RLSO, and Appendix B received 11 August.
2. EPA comments on 2023 Annual Site Inspection Report received 12 September.

UPCOMING FIELDWORK

Contractor	Activity	Dates
HDR	LTM	11 to 20 October 2023
HDR	VMP Installation and Sampling	Early to mid-October 2023

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