

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**10 OCTOBER 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, Kevin Koporec

TDEC Division of Remediation, RPM – Jamie Woods

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

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Tom Holmes (absent); 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 EPA has a new division director as of August 2023. He said he expects no major changes though there may be some shuffling of employees between divisions and areas of focus.

## **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 the Army is near completion on a response to EPA comments.

### **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. EPA comments on the RLSO were received on 29 September. Army is preparing a response to those comments.

### **Vapor Intrusion (VI) Study**

Mr. Mokri said that follow-up passive soil vapor samplers and sewer line samplers were deployed in August. Samples were collected from areas designated for commercial land use. A data report was submitted to Army on 26 September.

Mr. Martinez Torres asked if this was intended to polish the Conceptual Site Model (CSM) so that the FFS can be completed. Mr. Mokri responded that this was for VI investigation. He said there was a VI CSM and a Sampling and Analysis Plan (SAP), of which this VI study is a part. Mr. Mokri said the FFS and the RPP are focused more on the groundwater remediation, whereas this VI study is focused on the VI health risk.

Mr. Mokri shared via the webinar screen a figure by Beacon showing the sample locations. He then shared a figure depicting the chloroform results; Mr. Mokri said that concentrations were generally low. He showed additional figures depicting results of other chlorinated volatile organic compounds (CVOCs). Mr. Mokri stated that trichloroethene (TCE), tetrachloroethene (PCE), and chloroform were

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the only CVOCs detected above residential vapor intrusion screening levels (VISLs) with greatest concentrations reported in samples collected from Target Treatment Area 1 (TTA-1).

While displaying TTA-1 figure, Mr. Mokri pointed out a data gap in the northern portion of Building 972, where there was an exceedance of the commercial VISL at PV-115. He said additional passive vapor samplers would be installed in that area this month to close the data gap.

Mr. Bentkowski asked if there were any carbon tetrachloride detections. Mr. Mokri replied that there were not. Mr. Bentkowski asked if there would be indoor air sampling. Mr. Mokri answered that yes, there would be. He stated that, in accordance with the SAP, the passive samplers would be followed by active sampling, which would then be followed by indoor air sampling. Mr. Mokri said there is enough flexibility in the SAP that indoor air sampling could be initiated earlier if deemed warranted by elevated results.

Mr. Millar asked if chlorinated solvents were used inside Building 972 and the potential for background sources to contaminate indoor air samples. Mr. Mokri stated that a building survey was conducted approximately 4 years ago, as part of the VI screening assessment, and PCE brake and/or carburetor cleaner were observed. Mr. Millar stated that this may be an issue if indoor air samples are planned. Mr. Mokri agreed and stated that for this reason, indoor air samples may not be appropriate for Building 972 and that soil vapor samples may be better suited for evaluating VI risk in this building.

Mr. Bentkowski explained that women of child-bearing age have a shortened duration of exposure to TCE. He asked if any women were employed in areas with TCE detections. Mr. Mokri replied that he did not have that information, but could obtain it from the Barnhart facility manager. Mr. Bentkowski stated if such women were exposed to TCE, that it would be cause for prompt action. Mr. Mokri stated that the Beacon results are semi quantitative and that active sampling from sub slab sample ports and vapor monitoring points (VMPs) at Building 972, planned for the coming weeks, may be more suitable for evaluating health risk.

Mr. Koporec asked what hazard index was used to determine the screening levels. Mr. Mokri indicated that a hazard index of 0.1 was used and Mr. Koporec stated that the 0.1 hazard index provides additional protectiveness.

Mr. Bentkowski asked about the construction of the slab, noting that military construction often uses a thicker slab but the slab may have deteriorated through use of the building over the decades. Mr. Mokri stated that the slab is approximately 8 to 10 inches thick and is in generally good condition.

Mr. Mokri shared a figure depicting where additional samplers will be installed in the next two weeks.

## **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 that each month the compressor and blower are exercised.

Dunn Field was mowed in September.

The internal draft of the Year 12 Annual Report is being reviewed by Army.

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**Property Transfer**

The Dunn Field West VI SAP was submitted to EPA and TDEC on 15 August. Comments were received from EPA on 28 September. Mr. Mokri said TDEC comments have not been received.

Mr. Mokri stated that Army is still considering a carveout of the property transfer.

**LONG TERM MONITORING (LTM)**

The LTM event is scheduled to begin this week and continue through next week.

**OTHER ISSUES**

2023 Annual Land Use Controls Site Inspection: EPA comments were received 12 September. Army is preparing a response to EPA comments.

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

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

EnviroNews: The Winter 2023 newsletter is in preparation.

Mr. Martinez Torres asked if there was any progress on having the Army's legal team meet with the EPA's legal team regarding the property transfer. He also asked if Mr. Millar would provide a letter summarizing the state of the property transfer and the carveout. Mr. Millar responded that he would do that, though at this point the progress is no more than what has been discussed on the Site Management Team calls. He said that the carveout might go forward, though the USACE and the General Services Administration (GSA) are still in discussion about it. Mr. Foster added that the environmental legal team believes the carveout is a good idea but the real estate legal team is still considering the ramifications.

**DOCUMENT AND ACTION ITEM TRACKING FORMS**

Prioritized List of Documents for Regulatory Review

Reports

1. Dunn Field West VI SAP Revision 0 submitted 15 August, awaiting TDEC comments.

**Documents Requiring Army Revision or Responses to Agency Comments**

1. EPA Review of 2022 MI FFS Report RTCs, RLSO and App B received 11 August.
2. EPA Review of 2023 Annual Land Use Controls Site Inspection, Rev0 received 12 September.
3. EPA Review of DFW VI SAP Rev0, received on 28 September.
4. EPA Review of RLSO for Sampling and Risk Screening Report, Rev1, received 29 September.

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**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	LTM	11 to 20 October 2023
HDR	VMP Installation and Sampling	16 to 27 October 2023

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