

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

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 (absent)

TDEC Division of Remediation, RPM – Jamie Woods (absent)

USACE, Mobile –Chase Carter (absent), Melissa Shirley

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

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

GENERAL

Mr. Martinez Torres stated he had received email notification that a monitoring well on DDMT had been damaged and is now out of service. He said he will discuss with the EPA legal department whether, due to recent guidance on Applicable or Relevant and Appropriate Requirements (ARARs), an Explanation of Significant Differences (ESD) will be required to account for the change in well status. Mr. Holmes stated that specific monitoring wells are not listed in the Record of Decision (ROD) as part of the selected remedy for DDMT, and he does not believe an ESD or other decision document modification will be necessary. Mr. Martinez Torres said he would discuss with EPA legal and provide additional information.

Mr. Foster stated that the Army is reconsidering how to continue with the conveyance of the Dunn Field West parcel. At this time, the Army will most likely choose to not proceed with the “carveout” of the hotspot on the west side of the property.

MAIN INSTALLATION (MI)

No current remedial action at the MI.

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

On 24 October, Army replied to EPA’s 11 August 2023 letter reviewing responses-to-comments (RTC) and the redline-strikeout (RLSO) version of the FFS Rev0. Mr. Holmes stated that Mr. Martinez Torres emailed receipt of the Army’s response this morning stating his intent to respond by 14 December.

Human Health & Ecological Risk Assessment (HHERA) Review Sampling

Army is developing a response to the EPA review letter dated 29 September 2023. Additional sampling is planned to evaluate the extent of dioxins-furans and to consider further action to prevent unacceptable risk for site workers. Mr. Holmes shared two figures, one showing all soil samples locations with dioxin and furan analysis, including the four samples exceeding the non-carcinogenic RSL (720 pg/g), and a second figure illustrating the planned sample locations. Mr. Holmes stated that four samples will be taken in cardinal directions 50 feet from each of the four soil borings exceeding the RSL. The locations were selected based on the contamination being due to small releases. If the additional samples do not determine the extent of contamination, additional sampling will be considered. Once the extent is determined, an appropriate response for risk reduction will be proposed.

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Vapor Intrusion (VI) Study

Mr. Holmes said that vapor monitoring points (VMPs) were installed in October, with final installation completed last week. Vapor sampling began yesterday. VMP locations were discussed during the October Site Management Team (SMT) call.

DUNN FIELD

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

Mr. Pannell stated that the Year 12 Annual Report Rev0 is in preparation and will be submitted to the regulatory agencies in the next few days.

Dunn Field West

The Dunn Field West Vapor Intrusion (VI) Sampling and Analysis Plan (SAP) was submitted to EPA and TDEC on 15 August. Comments were received from EPA on 28 September. TDEC approval was received on 26 October. Army is preparing a response to EPA comments, which will likely be submitted this week.

Mr. Holmes said one EPA comment on the VI SAP regarded the extent of the plume. Mr. Holmes shared figures illustrating the plume and chlorinated volatile organic compound (CVOC) concentrations in groundwater and the planned vapor sample locations.

Mr. Martinez Torres asked if any consideration has been given to placing additional monitoring wells in the path of the plume. Mr. Holmes answered that there is not a plan at present. He said a monitoring well had been considered to be placed in a clearing south of MW-71; however, the landowner did not grant access. Mr. Holmes said wells could be placed along Rozelle Street. Mr. Millar added that there are some city-owned properties along Rozelle Street where a monitoring well could be placed.

Mr. Martinez Torres said he would like to have a record of communication with the landowners where access was not granted. Mr. Martinez Torres said the record would also be good for tracking environmental justice issues. To that end, he would like the record to include the annual newsletter and any handouts that are given to homeowners when remedial action work is performed in the neighborhood. Mr. Millar pointed out that the annual inspection of Land Use Controls (LUCs) as well as the annual newsletter are available on the DDMT Information Repository website (<https://ww3.sam.usace.army.mil/DDMT/>).

Mr. Martinez Torres asked what is the plan if access is not granted for the VMPs. Mr. Holmes answered that there are other locations further north that could be used. Mr. Martinez Torres asked what happens if there is an exceedance, for example at VMP-27. Mr. Holmes answered that if concentrations exceeded Vapor Intrusion Screening Levels (VISLs), additional work would follow. He said such a plan hasn't been created yet because similar screening has been performed in this area without encountering exceedances in shallow samples. Mr. Millar said that if the shallow VMPs continue to be below VISL, then there is no pathway for VI to affect a residence or building.

Mr. Holmes said that the Dunn Field West remedial action is in review by Army.

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LONG TERM MONITORING (LTM)

Mr. Holmes said that water levels and planned samples were collected 12–19 October. Sample results are being received from the laboratory and data validation is in process.

OTHER ISSUES

2023 Annual Land Use Controls Site Inspection: Army is preparing a response to EPA comments of 12 September. TDEC approval letter was received 29 September.

2024 Site Management Plan: Mr. Holmes said responses to Army comments on the Draft 2024 Site Management Plan are being prepared.

EnviroNews: Articles and graphics for the Winter 2023 newsletter have been approved. The draft layout is being prepared.

Community Information Line: No calls were received since the October SMT meeting.

Mr. Martinez Torres expressed appreciation to veterans and for the ongoing efforts of SMT members in support of the DDMT community.

DOCUMENT AND ACTION ITEM TRACKING FORMS

Prioritized List of Documents for Regulatory Review

Reports

None

Responses to Comments

1. Army response to EPA Review of 2022 MI FFS Report RTCs submitted October 24 and RLSO, tables and figures submitted 10 November.
2. Army response to EPA comments for Dunn Field West VI SAP submitted 14 November.

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA Comments for 2023 Annual Land Use Controls Site Inspection Rev0 dated 12 September 2023.
2. EPA Review of RTCs and RLSO for Sampling and Risk Screening Report Rev0 dated 29 September

UPCOMING FIELDWORK

Contractor	Activity	Dates
	No fieldwork scheduled at this time	

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The next meeting of the Site Management Team will occur via Webex on Tuesday, 12 December, at 11:00 am EST, 10:00 am CST.