

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**12 DECEMBER 2023**  
**11:00 EST**

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 (absent), Kevin Koporec

TDEC Division of Remediation, RPM – Jamie Woods

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

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Clayton Mokri; Tom Holmes, Nancy Jepsen

## **GENERAL**

Mr. Millar provided the PFAS Site Investigation (SI) via DOD SAFE to the Site Management Team (SMT) members. He said the PFAS Remedial Investigation (RI) will be launched in the new year. The Preliminary Assessment (PA) and the SI were performed by Leidos on a nationwide contract. Any comments from SMT members on the PA and SI will be addressed in the PFAS RI that will be specific to DDMT.

## **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 (RTCs) and the redline-strikeout (RLSO) version of the FFS Rev0. The FFS RLSO tables and figures were revised per Army's 24 October reply to EPA's 11 August letter and submitted to EPA on 10 November. EPA plans to reply on 14 December.

Mr. Martinez Torres restated his intent to submit comments by the end of this week. He said on 27 November he emailed a request for more information on two topics. The first topic concerned the location of the condensate discharge on Dunn Field and a copy of the permit from the receiving facility for the wastewater. The second topic concerned the criteria for copper and zinc concentrations in the effluent. He said he has not received information on these two topics, and he asked if that information could be provided this week.

Mr. Millar answered that a draft response is being reviewed by the Environmental Law Division. The response provides background for condensate discharge from DDMT and the agreement with TDEC. Mr. Millar said that if EPA requires that the water be transported for offsite disposal, the Army will do so; it will be only a matter of inconvenience and expense. Mr. Millar stated that previously water was sent to the Memphis publicly owned treatment works (POTW); however, the POTW no longer accepts water from CERCLA sites. The water is tested for copper, zinc, and volatile organic compounds (VOCs), and if copper and zinc meet TDEC criteria, the water is discharged to a grassed swale which drains into a storm water inlet on Dunn Field, in accordance with the TDEC agreement.

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Mr. Martinez Torres asked about Response 5 in Army's 24 October submittal , which pertained to monitored natural attenuation (MNA) and meeting the maximum contaminant level (MCL) at the site boundary where the offsite contamination plume is. Mr. Holmes answered that the EPA comment referred to Alternative 2, which was limited to SVE and MNA and did not include AS/SVE to reduce concentrations in plumes coming on to the MI. Alternative 2 would therefore not meet applicable or relevant and appropriate requirements (ARARs); in addition, although MNA was a component of the selected remedy, aquifer conditions at DDMT do not meet EPA criteria for use of MNA . Therefore Alternative 2 has been removed from consideration. The other alternatives include air sparge/soil vapor extraction (AS/SVE) at the site boundary and will meet ARARs.

**Human Health & Ecological Risk Assessment (HHERA) Review Sampling**

On 30 November, Army replied to the EPA review letter dated 29 September 2023. Additional sampling is planned to evaluate the extent of dioxins-furans and determine appropriate action to prevent unacceptable risk for site workers. Mr. Holmes said sampling locations were depicted on a map included in Army's reply. He also noted that the scope of work for sampling and risk screening has been completed, and the additional sampling will be through a separate task order from Army.

**Vapor Intrusion (VI) Study**

Mr. Holmes said that the installation of vapor monitoring points (VMPs) and sub-slab (SS) sample points and vapor sampling was completed 13 November. Analytical results have been received and data validation completed; report preparation is in progress. The data report will include recommendations for indoor air sampling and additional SS sampling.

**DUNN FIELD**

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

Mr. Pannell stated that the Year 12 Annual Report Rev0 was submitted 14 November, with a review period of 60 days.

**Dunn Field West**

Mr. Holmes said the Dunn Field West Vapor Intrusion (VI) Sampling and Analysis Plan (SAP) is being prepared under an existing task order that has a period of performance ending 31 December 2023. He said that Army submitted a response to EPA comments on 14 November. He asked that EPA review Army's response as soon as possible in order to close out the task order. Mr. Martinez Torres said he would complete the review this month.

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

Property transfer plans are still on hold.

**LONG TERM MONITORING (LTM)**

Mr. Holmes said the October 2023 sample analytical results were received and data validation completed; the LTM report is in progress and will be submitted for Army review early in January. As

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previously reported by Army, MW-100B , located on Barnhart Crane property at the MI could not be sampled. Mr. Holmes said the well is scheduled to be abandoned and replaced in 2024.

**OTHER ISSUES**

2023 Annual Land Use Controls Site Inspection: Army's response to EPA comments was submitted 21 November.

2024 Site Management Plan (SMP): Mr. Holmes said the Rev0 SMP was submitted to EPA and TDEC on 29 November. he noted that the Federal Facilities Agreement stipulates a 30-day review period for the SMP. Mr. Martinez Torres said he is tracking on the 30-day review period.

Mr. Martinez Torres said he will use the schedule in the SMP to populate the EPA project budget. He asked to be informed if there any items in the schedule that might require additional time. Mr. Holmes said the schedule in the SMP was updated prior to submittal and provides the best estimate for timing of the listed items. He noted that the schedule will be reviewed again when responses to EPA comments are submitted.

Mr. Millar noted that the Army is planning to abandon some wells in 2024. He said that nine wells were installed to study the offsite plume coming onto Dunn Field, of which six have access agreements expiring in 2024. The wells are in the neighborhood northeast of Dunn Field. Mr. Holmes added that this was also stated in the SMP.

Information Repository (IR): The semiannual update to the IR is in progress.

EnviroNews: The newsletter has been printed and will be submitted to the mailer this week.

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

Ms. Shirley submitted the document tracker prior to the meeting. She said the completed projects were moved from the tab titled "DDMT Active Tasks" in order to streamline that view. She intends to email the tracker on Mondays prior to the SMT meeting.

**DOCUMENT AND ACTION ITEM TRACKING FORMS**

Prioritized List of Documents for Regulatory Review

Reports

1. Off Depot AS/SVE Year 12 Annual Operations Report Rev0 (14 November 2023)
2. 2024 Site Management Plan Rev0 (29 November 2023)

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Responses to Comments

1. Army Responses to EPA Review of 2022 MI FFS Report RTCs and RLSO (11 August 2023) submitted 24 October and 10 November.
2. Army Response to EPA comments for 2023 Annual Site Inspection Rev0 (12 September 2023) submitted 21 November.
3. Army Response to EPA comments for DFW VI SAP Rev0 (28 September 2023) submitted 14 November.
4. Army Response to EPA Review of Sampling and Risk Screening Report Rev0 (29 September 2023) submitted 30 November.

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

None

**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	MI VI Sub-Slab and Indoor Air Sampling	TBD-January/February 2024

The next meeting of the SMT will occur via Webex on Tuesday, 9 January, at 11:00 am EST, 10:00 am CST.