

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**MARCH 12, 2024**  
**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 (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. Mokri announced that the next Site Management Team (SMT) meeting will be held via Microsoft Teams instead of Webex. A new meeting invitation will be sent that contains the meeting link.

## **MAIN INSTALLATION (MI)**

No current remedial action at the MI.

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

Army submitted responses to comments (RTCs) with a redline-strikeout (RLSO) version of the text on February 9. Revision 1 of the FFS will be submitted upon EPA concurrence.

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

Army submitted RTCs and RLSO text to EPA on February 6. Revision 1 of the FFS will be submitted upon EPA concurrence.

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

Mr. Mokri said that sub-slab ports were installed last week in Buildings 260, 265, and 972. The summa cannisters are scheduled to arrive within the next two days, at which time indoor air and sub-slab sampling will commence.

Mr. Martinez Torres said the EPA is planning to conduct a site assessment of the offsite areas to the west of the MI, similar to the assessment EPA conducted last year to the northeast of Dunn Field. EPA is looking to determine if there is risk of vapor intrusion at the residences near the off-site plume west of the MI. He said the same team members will be conducting the assessment, and the results will be shared with the SMT. Mr. Martinez Torres said the EPA will look into the origin of the plume and will chase the plume if necessary.

Mr. Millar said he shared boring log information with Mr. Bentkowski approximately two weeks ago, at which time Mr. Bentkowski had briefed Mr. Millar on the EPA assessment. Mr. Millar said he hopes the sources are not shallow enough to contaminate indoor air and asked if HDR was aware of any sources in this area.

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Mr. Mokri said that the area west and hydraulically upgradient of the church has a historical industrial use, but that it is unlikely that there is shallow soil contamination beneath the church/residential area.

Mr. Holmes stated that when monitoring wells are installed, it took time for contaminants to be detected at elevated concentrations in the upgradient wells (MW-269 and MW-278). He said that the well showing the highest level of contamination currently is the well west and upgradient of the church next to a school district office (MW-278). Mr. Holmes said shallow contamination should be observed near the upgradient origin of the plume.

Mr. Martinez Torres said he would appreciate any additional data, especially any recent data. He thanked the SMT for the previous investigations. He said, as far as the EPA is concerned, the plume originated from a source other than the U.S. Army. He stated that the SMT has investigated enough, but the government will pursue the plume further.

Mr. Martinez Torres said DDMT has been nominated for the National Federal Facility Excellence in Site Reuse award and appreciated government's efforts to incorporate environmental justice.

### **Dunn Field West (DFW)**

#### **Remedial Action**

Mr. Pannell said responses to EPA comments on the AS/SVE Year 12 Operations Report, Rev0, were provided on February 6 along with a RLSO version of the document text. Mr. Martinez Torres said he provided one comment earlier this morning. Mr. Millar said he would forward that comment to Mr. Pannell.

#### **Dunn Field West**

Mr. Mokri said the Dunn Field West VI Sampling and Analysis Plan was approved by EPA on February 2. Army is in process of contracting for VI sampling.

He said several repairs were made to the Dunn Field West perimeter fence in February.

### **LONG TERM MONITORING (LTM)**

Mr. Mokri said the 2023 Annual LTM Report, Rev0, was submitted on February 16. The next LTM event is scheduled for the first two weeks of April.

### **OTHER ISSUES**

Mr. Foster said Army reached out to Barnhart Crane about recent soil vapor sample results. Mr. Foster and Mr. Millar held a teleconference with Barnhart Crane's leadership, safety council, safety officer, and technical staff. Mr. Foster and Mr. Millar shared technical data. Mr. Foster conveyed recent soil vapor sample results to Barnhart Crane noting that the sample data is for outside and beneath the Barnhart Crane building, and the actual exposure inside the building might be less. He informed Barnhart Crane that Army has stepped up the sampling process so

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that in-building testing will be expedited, and he asked permission to conduct sampling earlier than originally scheduled. Barnhart Crane agreed, asking only for the sampling to not interfere with operations. Mr. Millar followed up with emails of additional data and screening levels.

Mr. Foster told the SMT members that the property was transferred to Barnhart Crane in 2002 or perhaps 2003, and Barnhart Crane has conducted manufacturing operations on the property during the past 20 years. He said that Barnhart Crane has an industrial HVAC system and can increase the amount of air exchange to decrease exposure, if indoor air sampling identifies risk.

Mr. Foster noted that Occupational Safety and Health Administration (OSHA) regulations are the primary driver for civilian businesses rather than environmental regulations. He said that Barnhart Crane knows they have options available that they can pursue immediately, including increasing the HVAC exchange rate. Their safety staff have reviewed the data and can perform their own sampling in addition to the sampling that Army will conduct. Mr. Foster stressed to the SMT members the importance of communicating with Barnhart Crane in a manner that will keep access open for further sampling and data collection.

Mr. Foster and Mr. Millar reached out to the Army Public Health Command (USAPHC) and the USACE Center for Excellence (CX). The subject matter experts at both organizations believe it's premature at this point to consider evacuation of buildings or wearing respirators or other personal protective equipment (PPE). Mr. Millar said engineering controls, such as increasing the HVAC exchange rate, would be preferred over PPE.

Mr. Martinez Torres asked that if the team receive any information about potential risk, even data that are preliminary, and that any resolution with the affected party be communicated to the EPA. Mr. Millar agreed and added that the data will also be shared with USAPHC and the CX, who will continue to monitor the situation.

Mr. Foster emphasized that Army will always support the objectives of public health and will continue moving forward with the EPA and TDEC to mitigate risk. He asked that the SMT members be cognizant of what was the original source, any contributing source, and any current source. Mr. Martinez Torres responded that the EPA has a similar mindset. He wants to be sure that we take accountability when necessary and pursue further investigation as needed. He said that is why the partnership among the SMT members is so very important and he is grateful for the information the Army continues to provide to the EPA.

PFAS Investigation: Mr. Millar said the PFAS investigation for Memphis is being coordinated by the USACE Baltimore District, which is using Leidos as the contractor. Comments on the preliminary assessments and site investigations were sent to Leidos, who will incorporate the comments as they prepare the remedial investigation. He said the remedial investigation work will be awarded at the end of this fiscal year, with the work conducted during 2025 and 2026. Mr. Millar said he has very little interaction with the PFAS investigation, but will relay any information he receives from other BRAC personnel.

Mr. Martinez Torres said that EPA headquarters has asked that discussion of PFAS investigation be included with every meeting, even though the investigation is not being conducted by the SMT.

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Mr. Martinez Torres asked that every time DDMT has an interaction with the public or when there is progress on an investigation, that he be provided a situation report so that he is consistent in his communication to higher levels of the EPA.

2024 Site Management Plan (SMP): Army submitted revised RLSO text, revised master schedule, and a table listing document submittal dates on February 12. Mr. Martinez Torres discussed the importance of an accurate schedule because EPA headquarters uses the SMP schedule to allocate resources. Mr. Holmes stated he believes the dates will be correct and asked Mr. Martinez Torres if there was any specific item he was concerned about. Mr. Martinez Torres asked that he be informed if there is doubt that any of the primary documents will not be completed on schedule, or if there is doubt about the schedule for any secondary documents that support the primary documents.

2023 Annual Land Use Controls Site Inspection: Army submitted revised RLSO text, tables, and figures on February 21 as a response to the EPA review of January 11.

Community Information Line: No calls have been received since the February SMT meeting.

**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 Sampling and Risk Screening Report (1/5/24) submitted 2/6/24.
2. Army Response to EPA Review of MI FFS Report RTCs and RLSO (12/14/23) submitted 2/9/24.
3. Army Response to EPA Review of 2023 Annual Site Inspection RTCs (1/11/24) submitted 2/21/24.

Mr. Martinez Torres said he will have the reviews completed by the end of March, possibly by the end of this week. He said the EPA's two main concerns are the addition of two monitoring wells and questions about disposal of the investigative derived waste (IDW). Mr. Holmes said that the MI FFS was revised to document that IDW water from Dunn Field will no longer be disposed onsite; instead, it will be disposed at a permitted offsite facility. Mr. Millar said the addition of the two wells would be better discussed as part of the LTM report. He said the Sampling and Risk Screening Report is limited to the work conducted in the dip tank area, and discussion of additional groundwater monitoring wells on the MI could be confusing to readers of the Sampling and Risk Screening Report. Mr. Holmes said the comments would be addressed in the LTM report. He said he needs to know what specific data gap the wells would resolve, for example, groundwater flow direction or suspected contaminants.

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

1. 2024 Site Management Plan RTCs (1/4/24) submitted 2/12/24. Comment received from EPA on 3/12/24.
2. Off Depot AS/SVE Year 12 Report (12/18/23) submitted 2/6/24. Comment received from EPA on 3/12/24.

**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	MI VI Sub-Slab and Indoor Air Sampling	March 13 – 18 2024
HDR	LTM	April 3 – 13 2024
HDR	Well Abandonment and MW-100B Replacement	May – 6 June 13, 2024

The next meeting of the SMT will occur via Microsoft Teams on Tuesday, April 9, at 11:00 am EDT, 10:00 am CDT.