

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**APRIL 9, 2024**  
**11:00 EDT**

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, Kevin Koporec (absent)

TDEC Division of Remediation, RPM: Jamie Woods

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

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Clay Mokri, Tom Holmes, Nancy Jepsen

## **GENERAL**

### **MAIN INSTALLATION (MI)**

No current remedial action at the MI.

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

Latest EPA comments received on March 15. Responses to comments (RTCs) and updated Table 2 (applicable or relevant and appropriate requirements [ARARs]) submitted to EPA and TDEC on March 19. Mr. Mokri said that Army has accepted EPA comments and is waiting for EPA concurrence before submitting Revision 1 of the FFS.

Mr. Martinez Torres said EPA legal counsel is reviewing the latest comments and that he would check on the status.

Mr. Martinez Torres noted that the document has been called Revision 0 for many months and he believes it should be called Revision 1, or an even higher number, by now. Mr. Holmes acknowledged that there have been revisions to the report, but the Federal Facilities Agreement for DDMT did not account for extended agency reviews and established that final documents would be Revision 1. Mr. Martinez Torres said he understood and asked that transmittal letters and the document tracker be checked for accurate revision numbers and dates. He will match his correspondence to the letters and tracker.

#### **Sampling and Risk Screening Report**

Army submitted RTCs and redline-strikeout (RLSO) text to EPA on February 6. Revision 1 of the report will be submitted upon EPA concurrence.

Mr. Martinez Torres said he would check his notes and send comments or concurrence by close of business.

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

Sub-slab and indoor air samples were collected from Buildings 260 and 972 in March. Mr. Mokri said the sample results have been delayed, but were expected to arrive on Wednesday, April 10. He stated that once the results have been validated, a report will be submitted to the regulators. If the validated sample results indicate exceedance of the removal management levels (RMLs), Army will notify SMT members within 24 hours. If the results are below RMLs,

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Army will prepare and submit a data report. Mr. Martinez Torres asked that an email be sent once data validation is complete, for his regional administrator will want an update. Mr. Millar agreed that if the sample results show an exceedance, EPA will be informed immediately, but if the results do not show an exceedance, notification will wait until after data validation is complete.

Three indoor air samples in Building 265 and one indoor air sample in Building 972 were not collected due to a delay in the FedEx supply shipment. These samples and co-located sub-slab samples are scheduled for the upcoming weekend, April 13–14. Mr. Mokri said the sampling would occur on the weekend because the overhead doors would be closed (the doors are usually open during normal operations) and there would be less background contamination sources.

Mr. Bentkowski said the EPA has made progress in planning for a VI study offsite and to the southwest of DDMT.

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

#### **Remedial Action**

Mr. Pannell said Army submitted a response this morning to the EPA comment of March 12 for the Year 12 Operations Report, Revision 0 for the off-depot air sparge/soil vapor extraction (AS/SVE) system. Mr. Pannell noted that the funding for this activity ended the previous month and looks forward to wrapping this up as soon as possible.

#### **Dunn Field West**

Mr. Mokri said the contracting process has begun for the Dunn Field West VI sampling and analysis. Army has begun negotiations with the private property owner for right-of-entry to install vapor monitoring points west of MW-87.

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

Mr. Mokri said EPA comments on the 2023 Annual LTM Report, Rev0, were received on March 28, and Army is working on a response to comments. The 2024 April LTM event began last week and will wrap up in the next few days.

### **OTHER ISSUES**

2023 Annual Site Inspection: Army submitted RTCs, RLSO, and revised tables on February 21. Mr. Mokri noted the 2024 Annual Site Inspection would begin soon.

Mr. Martinez Torres said he thought he had provided something on the 2023 report. He will check his notes and reply soon.

2024 Site Management Plan (SMP): Latest EPA review received on March 12 requesting additional review/update of schedule. Army submitted RLSO with revised schedule on March 28.

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Administrative Record/Information Repository Compilation: To be completed after approval of 2023 LTM Report and 2024 SMP.

Community Involvement:

- No calls have been received since the March SMT meeting.
- Contact with Barnhart and Colliers to schedule March and April indoor air sampling.
- Contact with Barnhart and Colliers to schedule April LTM.
- Contact with Cintas and Glory Circle property owners to schedule off-site well abandonment for May.

EnviroNews: 208 returned copies of the newsletter as of April 1. The mailing list will be updated accordingly.

Mr. Martinez Torres said that PFAS information needs to be updated during each meeting of the SMT, even if it's only one bullet stating no progress. He also said the 2024 SMP will not be approved until information on the status of the PFAS investigation and plans for additional work are included, and the Master Schedule is amended to include PFAS activities.

Mr. Holmes stated that the latest 2024 SMP RLSO submitted on 3/28/24 presents a summary of the PFAS PA/SI in Section 3.3. Mr. Holmes also stated that revised master schedule submitted on 3/28/24 includes the PFAS SI.

**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 2023 Annual Site Inspection RTCs (1/11/24) submitted 2/21/24.
3. Army response to EPA review of MI FFS Report RTCs and RLSO (3/15/24) submitted 3/19/24.
4. Army response to EPA review of 2024 Site Management Plan RLSO and schedule submitted 3/28/24.
5. Army response to EPA comment of Year 12 Operations Report, Revision 0 submitted 4/9/24.

Documents Requiring Army Revision or Responses to Agency Comments

1. EPA comment on 2023 Annual LTM Rev0 (2/16/24) received from EPA on 3/28/24.

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**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	Bldg 265 and 972 Sub-Slab and Indoor Air Sampling	April 13 – 14, 2024
HDR	LTM	April 3 – 11, 2024
HDR	Well Abandonment and MW-100B Replacement	May 13 – June 6, 2024

The next meeting of the SMT will occur via Microsoft Teams on Tuesday, May 14, at 11:00 am EDT, 10:00 am CDT.