

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY**  
**FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**  
**MAY 14, 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, Melissa Shirley

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae (absent)

HDR EOC: Clay Mokri (absent), 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 April 12 requested document submittals be consistent with the DDMT Federal Facility Agreement and include identification of wastewater disposal. Army response to comments is in preparation.

### **Sampling and Risk Screening (SRS) Report**

EPA, in response to Army letter of April 16, requested draft final SRS report be submitted for final review and approval. Report is in preparation.

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

Mr. Holmes said the indoor air (IA) and sub-slab (SS) sampling at Buildings 260, 265, and 972 was complete. He shared the results via Microsoft Teams. Mr. Holmes stated SS samples in Buildings 260, 265, and 972 had tetrachloroethene and trichloroethene above the vapor intrusion screening level (VISL). However, the concentrations in corresponding indoor air samples were below the commercial indoor air regional screening level (RSL).

Mr. Holmes stated other volatile organic compounds (VOCs), benzene and naphthalene, were slightly higher than the RSL for IA; these results might be due to the work that takes place in these areas. Acrolein was also detected in indoor air samples above the RSL but was present in outdoor air samples at similar concentrations.

The sample results will be included in the Main Installation VI Study report. Mr. Holmes said the second round of SS and IA samples would be collected in August.

Mr. Millar said that these results will be shared with Barnhart Crane. Mr. Martinez Torres asked what recommendation will be given to Barnhart Crane or other affected companies. Mr. Millar answered that Army would freely share the data with Barnhart Crane's management and safety/environmental staff. He said that if Barnhart Crane wants further advice or recommendations, then Army would assist, but Barnhart Crane has their own safety professionals and is unlikely to need help from Army.

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Mr. Millar stated that the samples were collected during the weekend when no workers were present and air exchange was limited so as to present a “worst-case” scenario. He said that during a typical operating day at Barnhart Crane, the roll-up doors are open and fans are circulating the air.

Mr. Martinez Torres asked if there was any concern about the companies discharging chemicals to the ground or in any way affecting the remedy for DDMT. Mr. Millar responded he does not believe so given the change in how solvents are handled presently as compared to when DDMT was operating.

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

#### **Remedial Action**

Mr. Pannell said a response is being prepared to the May 1, 2024 EPA comments on the Year 12 Operations Report, Revision 0.

#### **Dunn Field West**

Mr. Holmes said contracting is in progress for the Dunn Field West VI sampling. He noted that USACE has received tentative approval from the private property owner to install vapor monitoring points west of MW-87. The access agreement is being prepared and sampling should occur in the next several months.

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

EPA comments on the 2023 Annual LTM Report, Revision 0, were received on March 28, and a response-to-comments is in preparation. Mr. Holmes said the statistics are evaluated for review of sample frequency.

The 2024 April LTM event was completed on April 11. Sample results have been received and data validation is in progress.

### **OTHER ISSUES**

2023 Annual Site Inspection: On April 12, EPA requested information on fencing and signage be added to the 2023 Annual Site Inspection report. Mr. Holmes said that the Records of Decision (RODs) and the Land Use Controls and Implementation Plans (LUCIPs) were reviewed and there are two areas where fencing is required.

- Fencing is required around the golf course to prevent casual access and is maintained by the City of Memphis lessee; the fence is checked during the annual inspection and is in good condition.
- Fencing is required around the property held by the Army on Dunn Field, while remedial action is occurring; this fencing is maintained by Army and is in good condition.

Mr. Martinez Torres said that EPA headquarters personnel will likely visit Memphis within the coming year, which is driving his questions about fencing and signage.

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The 2024 Annual Site Inspection will begin this month.

2024 Site Management Plan (SMP): EPA granted approval of the Final 2024 SMP and requested additional information about fencing and signage, which was discussed above. A response is in preparation.

Administrative Record/Information Repository Compilation: Pending completion of outstanding reports (FFS, 2024 SMP, and 2023 LTM).

Mr. Holmes noted that EPA requested more data on four consecutive samples on wells to confirm action levels will be met. Mr. Holmes said the latest data is in the 2023 LTM report, but he is unsure what specific wells Mr. Martinez Torres is asking about. Mr. Martinez Torres suggested questions such as this be provided by email which he could answer in a timely manner.

Community Involvement:

- No calls have been received since the April SMT meeting.
- Contact with Barnhart to schedule MW-100B well replacement.
- Contact with private property owners for the offsite investigation wells that will be abandoned.

EnviroNews: 219 returned copies of the newsletter as of May 1. The mailing list will be updated accordingly.

PFAS: BRAC is using a different USACE district than Mobile District to conduct the Remedial Investigation (RI). The RI is scheduled to be awarded at the end of fiscal year 2024.

Mr. Martinez Torres said he shared the EPA PFAS Site Inspection report with the team. He said the EPA's review of PFAS reports takes longer than review of other reports. He asked if Mr. Millar had forwarded his comments to the USACE. Mr. Millar replied that Mr. Martinez Torres had included the correct USACE representative in his email, so no forwarding was required.

**DOCUMENT AND ACTION ITEM TRACKING FORMS**

Prioritized List of Documents for Regulatory Review

Reports

None

Responses to Comments

None

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

1. Annual LTM Report-2023.
2. Sampling and Risk Screening Report.
3. 2023 Annual Site Inspection Report.

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4. Off Depot AS/SVE Year 12 Report.
5. MI Focused Feasibility Study.

**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	Well Abandonment and MW-100B Replacement	May 13 – June 6, 2024
HDR	2024 Site Inspection	May 27 – 29 (tentative)

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