

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
JULY 9, 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 (absent)

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Tom Holmes, Clay Mokri, Nancy Jepsen

Mr. Millar started the meeting by inviting Mr. Martinez Torres to discuss the email he had sent the previous week. Mr. Martinez Torres said that one important point in the email is that the lead agency is working toward selecting a new remedy. He said he did not have an answer about the Memorandum for Record (MFR) but hopes to have an answer in a week or two, at which time he will email Mr. Millar to discuss whether an Explanation of Significant Differences (ESD) is needed.

Mr. Millar thanked Mr. Martinez Torres, noting that Army determined that an ESD would be overkill given that all the technologies are in the Record of Decision (ROD) and ROD Amendment. However, the Army is open to a different approach per EPA advice.

Mr. Martinez Torres said he believes that EPA management at the local level would be flexible, but he is concerned that higher level management or legal staff might require a more precise scope and location for the remedial action.

GENERAL

MAIN INSTALLATION (MI)

No current remedial action at the MI.

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

Draft Final (Rev1) submitted to EPA and TDEC on June 21. EPA approval letter received July 2. Final FFS in preparation.

Revised Proposed Plan (RPP)

Request submitted on June 13 for extension to October 10. EPA approved an extension to August 20. Army submitted the Draft RPP to EPA and TDEC on July 9.

Sampling and Risk Screening

Final (Rev1) Report submitted on May 23. EPA approval received June 24.

The Task Order for PCP Dip Vat area soil sampling was awarded July 3. Planning for sampling is in progress.

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Vapor Intrusion (VI) Study

Revised MI VI Phase 3 Data Report submitted to Army June 21. The second round of indoor air sampling is scheduled for October/November 2024.

Mr. Millar stated that EPA requested a copy of the MI VI Phase 3 report in their email to Army on July 3. Mr. Millar stated that Army plans to send the complete report, documenting all the sampling in early 2025, after the second round of indoor air sampling scheduled for October/November 2024.

Dunn Field West (DFW)

Remedial Action

Mr. Pannell stated the Off Depot AS/SVE Year 12 Report Rev1 (Final), redline-strikeout (RLSO) and transmittal letter were submitted to EPA/TDEC on May 30. Mr. Millar asked if EPA still wanted to keep this report as Draft Final for the time being. Mr. Martinez Torres answered that he would submit a letter to reiterate that the AS/SVE system will be reactivated in a different location, so the level and method of recording will need to be determined for the next phase of the system.

Mr. Millar replied that the proposed work in DFW will involve only SVE, which he believed had been done previously in that area. He said there would be a small dig-and-haul in the rebound area, then two or three SVE points would be established. Vapor monitoring and groundwater monitoring would be conducted during the SVE. He said it would be similar technology with similar results expected as with the earlier effort on Dunn Field.

Mr. Millar stated that there has not been indication of a concentration rebound at the AS/SVE system at the powerline area west of Dunn Field. Mr. Millar asked if EPA wanted the Off Depot AS/SVE Year 12 Report to be Final. Mr. Martinez Torres said he would not ask for a Year 13 report. He said that four consecutive samples over one year will need to show that there is no increasing trend. Mr. Millar said the samples would be run, but they would be every six months. He stated that there is one well (MW-159) with TCE above the MCL. Mr. Millar said that once that well is below MCL, then Army would work toward closing the site, but he expects that will not happen in the near future.

Mr. Martinez Torres said unlimited use/unlimited exposure (UU/UE) has to be achieved, and the five-year review must continue until then. He said that if tools are created that can meet UU/UE ahead of schedule, then the five-year reviews are not necessary. Mr. Millar said the last remaining area of rebound is at Dunn Field West, which the SVE system will address. He said once that is done, all of the site will be in the long-term monitoring (LTM) phase.

Mr. Holmes noted the clean up levels are targeted for industrial use not UU/UE. Mr. Martinez Torres said the target of the remedial team is to reach UU/UE by any means. If not, the federal government will have to continue five-year reviews. Mr. Millar said that as long as everything remains below industrial standards and the five-year reviews and monitoring are conducted, that's really Army's goal. Mr. Martinez Torres agreed that Dunn Field property not owned by

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Army should be cleaned up to UU/UE, but onsite will continue with land use controls (LUCs), inspections, monitoring, and five-year reviews.

Dunn Field West

The Task Order for implementation of the DFW VI Sampling and Analysis Plan was awarded July 3. Planning is in progress.

Army submitted a MFR to EPA/TDEC on June 28. An MFR was submitted instead of an ESD, since the change to the Remedial Action (RA) is minor and does not fundamentally alter the cleanup approach (e.g., soil excavation & disposal, SVE, LUCs). EPA confirmed receipt by email on July 1. EPA is researching whether an MFR is sufficient.

LONG TERM MONITORING (LTM)

EPA comments on the 2023 Annual LTM Report, Rev0, were received on March 28. TDEC approval was received on June 7. The responses to EPA comments and RLSO text were submitted on June 24.

OTHER ISSUES

Annual Site Inspection: The 2023 Annual Site Inspection Report, Final (Rev1), was submitted to EPA and TDEC on May 20. EPA sent a conditional approval with a request for additional information about fencing. Mr. Holmes said he thought the fencing could be addressed in the 2024 Annual Site Inspection Report that is currently being prepared by Army. Mr. Martinez Torres agreed.

Mr. Martinez Torres said that the EPA legal team noticed the Federal Facilities Agreement (FFA) requires fencing around Dunn Field. He said he understands no one is living there and that the new owner has to take responsibility for the fence. He stated a document needs to be signed in order to move on.

Mr. Holmes said the ROD identified the Dunn Field property outside of DFW for unrestricted use. The ROD states that fencing is required until all remedial construction activities are completed.

Mr. Millar said he is drafting a letter that will explain that the ROD stated No Further Action was required for the parcel (Dunn Field East) where the fence is now falling apart. There is no risk if trespassers walk on that property. The ROD states that the parcel is available for unrestricted use. Also, the ROD specifies that fencing of the DFW property is to be maintained by the Army until the site is cleaned up or until the property is transferred. Mr. Millar said that once the property is transferred, the fencing is no longer required since by that time the site should be cleaned up.

Mr. Martinez Torres said he understands, but said the EPA legal department may need to review the topic further. He believes the legal department will require a signed document stating the above.

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Mr. Martinez Torres asked if TDEC had any concerns. Mr. Woods said typically TDEC defers to the ROD, though he agrees that a memo would be helpful.

Administrative Record/Information Repository Compilation: In progress.

Community Involvement:

- No calls have been received since the June SMT meeting.
- Calls were made to TDEC, Shelby County Health Department, and MI property owners as part of the 2024 site inspection.
- The indoor air sample results were conveyed to Barnhart Crane on July 2.

EnviroNews: No more newsletters were returned as of July 1. Mailing list has been revised.

PFAS: The Request for Proposal (RFP) for a Remedial Investigation (RI), Feasibility Study (FS), and optional tasks was released on June 21. The RFP covers six areas of potential interest (AOPIs) on DDMT. The RI is scheduled to be awarded at the end of fiscal year 2024.

DOCUMENT AND ACTION ITEM TRACKING

Upcoming Target Dates/Deadlines from 2024 SMP

- Draft MI RPP (Rev0) due August 20.
 - The Draft RPP was submitted this morning. Since the Draft Final MI RPP (Rev1) deadline of November 8 was not extended, an additional extension might be requested after receipt of EPA comments.
- The following documents are expected to meet target dates/deadlines:
 - 2024 Annual Site Inspection Report target date of August 29.
 - 2023 Draft Final LTM Report (Rev1) target date of October 12.
 - DFW Remedial Action Work Plan (RAWP; Rev0) deadline of November 25.

Prioritized List of Documents for Regulatory Review

Reports

- 2023 Annual Site Inspection Report, Final (Rev 1) submitted to EPA on May 20. Conditional approval from EPA received June 20. Additional information requested will be provided in the 2024 report.
- Off Depot AS/SVE Year 12 Report, Final (Rev 1) with RLSO submitted to EPA on May 30; Mr. Martinez Torres said he would submit a letter on this report today.
- Dunn Field West MFR, Draft (Rev0) submitted to EPA on June 28.
- Draft RPP submitted to EPA/TDEC on July 9.

Responses to Comments (RTCs)

- 2023 LTM Report RTCs and RLSO submitted to EPA on 6/24.

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Documents Requiring Army Revision or Responses to Agency Comments

1. MI FFS Draft Final.

Mr. Martinez Torres discussed the documents listed for regulatory review. He said that he submitted a conditional approval for the 2023 Annual Site Inspection Report on June 20. In that approval he asked a few key points. He said team members could send him an email if there are any questions about those points. He said he will submit a letter today regarding the Off Depot AS/SVE Year 12 Report. He said that he needs to discuss the MFR with his team, but the team is on leave right now.

Mr. Martinez Torres said there is a community event on July 18 to discuss offsite contamination. He stated EPA did not identify any risk in soil vapor near the residential areas on the northeast side of Dunn Field. Mr. Martinez Torres further stated that a vapor intrusion investigation was also conducted southwest of the MI and there were no detections in the residential areas.

Mr. Woods stated that TDEC is aware of several former dry cleaners west of the MI. TDEC's site investigation team, the same team that evaluated sources northeast of Dunn Field in the Wabash area, is also planning to conduct investigation(s) to identify sources west of the MI.

Mr. Martinez Torres said the community is asking for information about volatile organic compounds (VOCs) at Dunn Field East. He said he is glad that so much investigation has been conducted at Dunn Field West, EPA can state most, if not all, of the area has been covered.

Mr. Woods asked for a copy of the report of the EPA's investigation on the east side of Dunn Field. (Mr. Martinez Torres shared the Hays Road Removal Evaluation Report via the Teams chat function.) Mr. Woods said that the local Protect Our Aquifer group would attend the July event, and TDEC has been sharing reports with Protect Our Aquifer and the Tennessee Department of Health.

Mr. Woods asked Mr. Holmes if Army had investigated soil gas in the northeast corner of Dunn Field. Mr. Holmes said Trinity had performed a membrane interface probe (MIP) survey at the northeast corner near Hays Road but that he was not aware of any VI sampling except the offsite sampling performed by EPA.

Mr. Woods said representatives from Protect Our Aquifer stated that some community members had expressed fear about walking along the golf course due to contamination concerns. Mr. Holmes said the purpose of the golf course area fence is to prevent casual access, so residents should not be walking along the golf course.

Mr. Martinez Torres asked if there were any new data about the pond on the golf course. Mr. Holmes answered that samples from the pond were collected during the MI RI. The RI and the ROD determined that the pond was not a health concern for the use of the site as a golf course. Sediment and surface water samples were collected from drainage channels from Lake Danielson and the golf course pond, for the MI risk screening and passive vapor data were collected from a nearby sewer line for the vapor intrusion investigation, but there has been no sampling of the pond itself since the RI.

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Mr. Woods said that Memphis Light, Gas and Water (MLGW) had not yet provided the Memphis Aquifer data he and Mr. Holmes had discussed. He will contact MLGW this week and will forward any data he receives.

UPCOMING FIELDWORK

Contractor	Activity	Dates
HDR	DFW VI investigation and PCP Dip Vat sampling	TBD (estimated August/September)
HDR	Long Term Monitoring Event	October 2024

The next meeting of the SMT will occur via Microsoft Teams on Tuesday, August 13, at 11:00 am EDT, 10:00 am CDT.