

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
AUGUST 13, 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: Shannon Berg, James Ferreira, 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: Tom Holmes, Clay Mokri, Nancy Jepsen

Mr. Foster began the meeting by expressing condolences for Ben Bentkowski. He was greatly respected and valued as a team member; he will be missed.

Mr. Martinez Torres introduced Shannon Berg (ecological risk assessor) and James Ferreira (hydrogeologist) to the team.

GENERAL

MAIN INSTALLATION (MI)

No current remedial action at the MI.

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

Final FFS submitted to EPA and TDEC on July 16. According to an email from Mr. Martinez Torres, the report is currently being reviewed by the EPA remediation panel.

Revised Proposed Plan (RPP)

Draft RPP submitted to EPA and TDEC on July 9. According to an email from Mr. Martinez Torres, the EPA is reviewing the plan and comments are expected within 14 days.

Sampling and Risk Screening

PCP Dip Vat area soil sampling is scheduled for September 7 through 10, 2024.

Vapor Intrusion (VI) Study

The second round of indoor air sampling is scheduled for November 2024.

The Draft VI Report submittal to EPA and TDEC is scheduled for December 8, 2024, per the 2024 Site Management Plan (SMP).

Mr. Martinez Torres asked if there were plans to share the Phase I/Phase II reports with regulators. Mr. Mokri answered that the interim data reports would be compiled into the VI report that will be submitted to regulators on December 8. The air sampling results were shared with EPA and TDEC; there were no industrial RSL exceedances of the chlorinated volatile organic compounds (CVOCs) in the indoor air samples. Some petroleum hydrocarbons and acrolein were detected in indoor air above industrial RSLs, but these were also detected in outdoor air or attributed to background industrial sources.

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Mr. Mokri provided a quick summary of the work performed as described in the data reports; 150 passive soil vapor samples were deployed across the site, which were analyzed for volatile organic compounds with specific attention on CVOCs. Based on the results of the passive samples, 49 vapor monitoring points (VMPs) were installed at 21 locations; each location had 1 to 4 sample screens at different depths (5 ft, loess; 15-36 ft; fine-grained fluvial deposits; 25-46 ft; coarse-grained fluvial deposits; and 63-75 ft, above water table). Sub-slab (SS) soil vapor ports were installed at 20 locations in the buildings.

One round of soil vapor samples was collected from VMPs and SS vapor ports. Some vapor sample concentrations exceeded vapor intrusion screening levels (VISLs), and indoor air (IA) samples were collections at locations with the highest risk. There were no VISL exceedances for CVOCs in the IA samples, although exceedances for petroleum hydrocarbon and acrolein. The next step is a second round of VMP, SS and IA samples in November.

Mr. Millar asked if those sampling locations were at the same spot as the groundwater plumes. Mr. Mokri answered that the samples were biased to locations that might have the highest vapor intrusion potential based on passive sample results and groundwater concentrations.

Dunn Field

Remedial Action

The final Year 12 Report was submitted to EPA and TDEC on July 17. Mr. Pannell said this is the last deliverable for the Off Depot portion of the project.

The AS/SVE inspection was performed on August 2 and equipment was exercised.

The AS/SVE compound was mowed on July 3.

Mr. Martinez Torres said he approved the final report and had a report noted as "Final." Mr. Pannell stated that the July 17 version was the "Final" version and is in the Administrative Record (AR)/Information Repository (IR).

Dunn Field West (DFW)

The VMP installation and sampling is scheduled for September 4 through 8.

Geophysical investigation is scheduled for September 7 and 8.

The Memorandum for Record (MFR) was submitted to EPA and TDEC on June 28. According to an email from Mr. Martinez Torres, EPA intends to respond today (August 13).

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 a red-line/strike-out (RLSO) text were submitted on June 24. According to an email from Mr. Martinez Torres, EPA will respond no later than August 23.

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OTHER ISSUES

Annual Site Inspection: Army submitted a letter on July 25 documenting that signage and fencing requirements are established in the ROD. According to an email from Mr. Martinez Torres, EPA requests an additional written agreement.

Mr. Martinez Torres said his legal department requests a document indicating that the fencing as described in the Record of Decision (ROD) is equivalent to the fencing in the Land Use Control Implementation Plan (LUCIP). Mr. Millar said that according to Army Environmental Legal Division (ELD), it is uncommon for Army to write an additional agreement beyond what the ROD states. Mr. Martinez Torres said the LUCIP came after the ROD and indicates the entire site is fenced. Mr. Millar disagreed, saying the selected remedy in the ROD was for only for the Dunn Field West area. Mr. Martinez Torres suggested this could be resolved by a discussion between the legal departments of EPA and Army. Mr. Millar agreed.

The 2024 Annual Site Inspection is complete, and Army will soon submit the draft report to EPA and TDEC (sent August 14).

AR/IR Compilation:

The AR Index and the IR Compilation Index were submitted to EPA and TDEC on July 24. The IR Compilation disc was delivered to TDEC this morning. The online IR upload was completed August 6 (<https://ww3.sam.usace.army.mil/DDMT/>).

Community Involvement:

- No calls have been received since the July SMT meeting.

2025 Site Management Plan: The 2025 SMP is being developed.

PFAS: No change since the July SMT meeting. The Request for Proposal (RFP) for a Remedial Investigation (RI), Feasibility Study (FS), and optional tasks was released on June 21. The RI is scheduled to be awarded at the end of fiscal year 2024.

Mr. Millar suggested having an on-site meeting in October. Team members agreed that October 1–2 would be feasible. Mr. Mokri said he would arrange for a conference room. Mr. Millar said he would email hotel recommendations.

DOCUMENT AND ACTION ITEM TRACKING

Upcoming Target Dates/Deadlines from 2024 SMP

- Draft MI RPP (Rev0) comments are due September 7.
- Draft 2024 Annual Site Inspection Report (Rev0) 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.
- Draft MI VI report target date of December 8.

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Prioritized List of Documents for Regulatory Review

Letters

- Letter documenting OU-1 fencing and signage requirements submitted to EPA on July 25.

Reports

- DFW MFR Draft (Rev0) submitted to EPA on June 28.
- MI RPP Draft (Rev0) submitted to EPA July 9.

Responses to Comments (RTCs)

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

Documents Requiring Army Revision or Responses to Agency Comments.

- None

UPCOMING FIELDWORK

Contractor	Activity	Dates
HDR	DFW VMP Install and Sampling	September 4–10, 2024
HDR	DFW Geophysical Investigation	September 7–8, 2024
HDR	PCP Dip Vat Sampling	September 7–10, 2024
HDR	LTM	October 1–11, 2024
HDR	DFW Soil Sampling	October 1–4, 2024

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