

# **SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE**

**October 8, 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 (Absent)

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

Koman Government Solutions: Larry Pannell

TechLaw: Mac McRae

HDR EOC: Tom Holmes, Clay Mokri, Denise Cooper

## **GENERAL**

Mr. Millar stated that he was in Memphis last week to observe the Dunn Field West soil sampling and long-term monitoring activities.

## **MAIN INSTALLATION (MI)**

No current remedial action at the MI.

### **Focused Feasibility Study (FFS)**

The Final FFS was submitted to EPA and TDEC on July 16. During the September SMT call EPA requested that the FFS be revised to include an additional alternative. Army is awaiting more detailed information on the request from the EPA review panel before moving forward with revisions. Since Army is waiting on comments from EPA on the FFS, responses to EPA comments on the Draft RPP and Army review of the internal draft Record of Decision (ROD) Amendment are on hold. Mr. Holmes stated that EPA approved the Draft Final FFS on July 2, and it is unclear why EPA is performing another review of the FFS.

Mr. Martinez Torres stated that although EPA conditionally approved the FFS, the EPA review panel concluded monitored natural attenuation (MNA) cannot be used as part of the remedy to achieve maximum contaminant levels (MCLs) since MNA or dilution will not prevent on site groundwater contamination from migrating off site. The FFS and the supporting documentation cited must be revised with a remedy that does not include MNA.

Mr. Holmes commented that MNA was part of the groundwater remedy in the Main Installation ROD approved by EPA, and that MNA was deleted from the remedy in the FFS due to a previous EPA comment, which also stated attenuation through dilution will occur. Mr. Holmes stated that Army should have written comments from EPA to consider revisions to the FFS.

Mr. Ferreira commented that the FFS must also address groundwater contamination plumes moving on site. Mr. Millar responded that Army is not responsible for remediating off-site sources. Mr. Holmes noted that AS/SVE at the Main Installation boundaries, where plumes in the FDAQ are migrating onsite, will reduce concentrations below MCLs, as seen in the Off Depot AS/SVE operations. The AS/SVE system to be installed in the the 'erosional window' will reduce concentrations below MCLs in groundwater flowing into the IAQ and MAQ. Soil vapor extraction (SVE) system operations on Dunn Field and the MI pilot test have shown that SVE, in areas with high concentrations in soil vapor, reduces the soil vapor concentrations, prevents

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contaminant migration to groundwater and reduces groundwater concentrations below MCLs in the SVE treatment area.

Mr. Martinez Torres stated that TDEC and EPA will decide how to address the off-site sources of groundwater contamination moving on to the Main Installation. Mr. Martinez-Torres will have another conversation to present EPA management review panel with this information.

Mr. Holmes stated that continued EPA review of the FFS and delay in providing comments prevents preparation of subsequent documents and implementation of the remedy. The preferred remedy in the FFS (AS/SVE) has been successfully implemented in Dunn Field and is expected to demonstrate similar results on the Main Installation.

Mr. Holmes stated that work to complete the RPP and Record of Decision Amendment are on hold until the FFS is approved. Mr. Millar voiced concerns about contract periods of performance (POP) for these documents ending at the end of the year. The POP can only be extended for four months and that may not be enough time to complete the documents given continued EPA comments and reviews.

Mr. Martinez Torres requested that the FFS be updated to include consideration of climate change and environmental justice initiatives. EPA has prepared a climate change and environmental justice assessment for the Defense Depot, which will be provided to Army for incorporation in the FFS. Mr. Martinez Torres anticipated submitting FFS comments within the next three weeks. He also requested an update to the report due dates in the Site Management Plan based on outcome of the FFS discussion.

## **Fencing and Signage**

Mr. Martinez Torres reported that he spoke with legal counsel about fencing and signage identified in the ROD. A signed agreement between Army, TDEC, and EPA will be required to document fencing requirements. Mr. Martinez Torres said that he does not think that signage will be necessary and is planning to send correspondence next week to resolve this issue.

## **Decision Document**

Draft RPP was submitted to EPA and TDEC on July 9 and EPA comments received on September 10. The Internal Draft ROD Amendment submitted on September 8 to Army for review. Further work on the RPP and ROD Amendment on hold pending resolution of EPA's FFS comments.

## **Sampling and Risk Screening**

PCP Dip Vat area soil sampling was completed in September. Laboratory analysis of soil samples is in progress with results due the last week of October.

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

Second round of indoor air sampling scheduled for early November 2024. Mr. Mokri notified the Barnhart Crane Yard Manager, David Dingledein, of the tentative schedule.

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## **Enhanced Bioremediation Treatment (EBT) Injection Wells**

Injection wells (IWs) have not been utilized since 2014. The IWs on Barnhart Crane property are subject to damage due to heavy equipment in the area. IWs are being identified for abandonment.

## **DUNN FIELD**

### **Remedial Action**

Dunn Field mowed on September 23. Denise Cooper performs a monthly inspection of the AS/SVE system, including exercising the system every other month. Inspections and area mowing will continue through December 2025.

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

VMP installation and sampling completed in September. Laboratory analysis of vapor samples is in progress.

Geophysical investigation completed in September and boring locations selected. Soil boring sampling was completed October 3. Samples were submitted to laboratory with analytical results due end of October.

Memorandum for Record (MFR) submitted to EPA and TDEC June 28. EPA comments received August 13. Army responses submitted October 3.

Mr. Martinez Torres indicated EPA needed additional data before agreeing that a MFR is sufficient or if an Explanation of Significant Differences is needed. Mr. Millar stated that the findings from the DFW investigation will be used define the approximate cost and remedy specifics so that additional detail can be provided in the MFR.

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

Army submitted the Rev. 1 Final 2023 Annual LTM report to EPA and TDEC on October 7.

October LTM sampling in progress.

## **OTHER ISSUES**

Annual Site Inspection: The Draft 2024 Annual Site Inspection was submitted to EPA and TDEC on August 13 and resubmitted to EPA on August 21. EPA to submit comments next week.

Community Involvement: No calls have been received since the September SMT meeting.

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

EnviroNews: Army approved the annual newsletter draft article list and production schedule on October 3. Preparation of articles and graphics is in progress.

PFAS: No new information.

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**DOCUMENT AND ACTION ITEM TRACKING**

**Upcoming Target Dates/Deadlines from 2024 SMP**

- Draft Final MI RPP (Rev1) target date of November 8. An extension may be requested following receipt of EPA comments.
- DFW Remedial Action Work Plan (RAWP) Rev0 deadline of November 25. An extension may be requested following completion of DFW soil sampling.
- Draft MI VI report target date of December 8.

**Prioritized List of Documents for Regulatory Review**

Letters

- None

Reports

- Draft 2024 Annual Site Inspection submitted to EPA and TDEC on August 13.

Responses to Comments (RTCs)

- RTCs on Draft Dunn Field Remedial Action Memorandum of Record on October 3.

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

**UPCOMING FIELDWORK**

Contractor	Activity	Dates
HDR	MI VI Indoor Air Sampling Round 2	November 2024

The next meeting of the SMT will occur via conference call on November 12, 2024.