

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
JUNE 10, 2025
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 (absent)
TDEC Division of Remediation, RPM: Jamie Woods
USACE, Mobile: Chase Carter, Melissa Shirley (absent)
USACE, Baltimore: Pete Phillips
EA: Sandy Brown, Ryan Guth
Koman Government Solutions: Brett Anchukaitis
TechLaw: Mac McRae
HDR EOC: Tom Holmes, Clay Mokri, Nancy Jepsen

GENERAL

MAIN INSTALLATION (MI)

No current remedial action at the MI.

Focused Feasibility Study (FFS)

Mr. Mokri stated the Draft Final FFS Revision 2 was submitted to EPA and TDEC on April 1. EPA comments were received May 28 and discussed on May 29. Army is preparing responses in accordance with the discussion and the EPA email of June 2.

Revised Proposed Plan (RPP)

The Draft Final RPP is being prepared. The deadline for the Draft Final is July 30.

Sampling and Risk Screening

Mr. Mokri stated this sampling was in the former PCP Dip Vat area. An Internal Draft of the Sampling and Risk Screening Update Report is being prepared, with a target date of August 6.

Vapor Intrusion (VI) Study

The Draft MI VI Study was submitted to EPA and TDEC on May 30, ahead of the June 4 target date. Comments are due July 29.

Dunn Field

Remedial Action

Mr. Anchukaitis said the monthly site inspection of the AS/SVE system was conducted with no changes noted from previous month.

Mr. Mokri stated rebound monitoring of the AS/SVE system was completed in April. Chlorinated volatile organic compounds (CVOCs) remain below 50 µg/L. The results will be discussed in the Internal April 2025 LTM Data Memorandum.

Mr. Mokri said that a Draft Rebound Monitoring Memorandum will be prepared with a target date of October 29.

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Mr. Martinez Torres asked about the 50 µg/L standard. Mr. Mokri explained that the goal of active treatment was 50 µg/L, after which monitored natural attenuation (MNA) would reduce concentrations below Maximum Contaminant Levels (MCLs). Mr. Millar added that most wells are already below the MCLs and the few wells that remain above the MCLs are showing a decreasing trend. Mr. Martinez Torres advised that the memo should include a rationale as to why MNA was appropriate for Dunn Field, such as no migration path to aquifer and no sinks in the area.

Mr. Martinez Torres asked if the rebound monitoring results will be included in the upcoming Five-Year Review Addendum. Mr. Holmes said discussion of rebound monitoring for the AS/SVE system was not necessary for the addendum. The issue raised by EPA, regarding the protectiveness determination, was based on potential for VI in the residential area west of Dunn Field. The Dunn Field West VI study found there was not a complete pathway for VI exposure.

Mr. Martinez Torres said there should be a discussion about PFAS. He acknowledged that PFAS is not part of the remedy, and he knows there is an ongoing conversation about incorporating PFAS into Five Year Reviews. He said that as the Five Year Review comes closer, he will ask his EPA counterparts for the most recent developments. He advised the Five Year Review should include a section on PFAS.

Mr. Millar asked when the next Five Year Review is due. Mr. Mokri said the Draft Five Year Addendum is due March 10, 2026. Mr. Millar said another memorandum will be sent in August since a status memorandum is sent every 6 months.

Mr. Guth said the first PFAS mobilization will be later this year, and data should be available for inclusion in the next Five Year Review.

Mr. Martinez Torres said his only concern is the recommendations contained in the EPA independent determination letter of January 2023. He said that as the Draft moves forward, he will try to incorporate those recommendations into the Draft.

Mr. Mokri said fence repairs have been completed, and a memorandum documenting the work has been submitted to the EPA. The fence repair memo will be included in the 2025 Annual Site Inspection Report, which is currently being prepared.

Dunn Field West (DFW)

DFW VI Study

Mr. Mokri stated the DFW VI study report was submitted to EPA and TDEC on May 27, ahead of the June 13 target. Comments are due July 26.

DFW Soil Investigation

Mr. Mokri said the Army completed additional step-out soil sampling in April and is tentatively planning additional delineation in October. Results of the DFW Soil Investigation will be presented in the DFW Explanation of Significant Differences (ESD).

Decision Document

The Internal Draft DFW ESD is being prepared. The deadline for the Draft is August 9.

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LONG TERM MONITORING (LTM)

The Draft 2024 Annual LTM report was submitted to EPA and TDEC on April 29. Comments are due June 28.

Mr. Mokri said the first semiannual groundwater sampling was completed in April. The Internal Draft April 2025 LTM Data Memorandum is being prepared.

OTHER ISSUES

Annual Site Inspection: The 2025 Annual Site Inspection was completed on May 9 with no issues identified. Property managers and SCHD were contacted for information as part of the annual site inspection. The report is being prepared with a target date of August 29.

Community Involvement: No calls received since the May SMT meeting.

Administrative Record/Information Repository (AR/IR): Mr. Mokri said the website migration is complete. HDR is waiting for approval from Washington National Records Center (WNRC) to submit the newest AR documents on DVD.

PFAS: Mr. Guth said Mobilization 1 is scheduled for October. He stated that comments have been received on the Quality Assurance Project Plan (QAPP) and a response is being prepared. The Draft Final QAPP is on track for submittal in early July.

Mr. Martinez Torres said the EPA's position on PFAS screening levels is evolving. He asked if TDEC had any concerns about screening levels or sampling methodology for the PFAS mobilization. Mr. Woods replied that he did not have concerns at this time but will confer with TDEC headquarters as work progresses. Mr. Woods stated that the plan prepared for DDMT will be used to guide PFAS RIs at other NPL sites in TN, especially Fund-led sites. Mr. Martinez Torres said that before EPA can agree with a final remediation report, the analysis process will need to be discussed. If he hears any updates from EPA headquarters or the White House, he will relay that to the PFAS team.

Action Item Tracking

Upcoming Target Dates (T) and Deadlines (D)	Due Date
	2025 SMP
Draft Final Revised Proposed Plan (RPP)	7/30/2025-T
Draft Sampling and Risk Screening Update	8/6/2025-T
Draft DFW ESD	8/9/2025-D
Draft 2025 Annual Site Inspection Report	8/29/2025-T

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Prioritized List of Documents For Regulatory Review

Reports

- Draft 2024 Annual LTM Report: Submitted to EPA and TDEC on 4/29. Comments due 6/28/25.
- Draft DFW VI Investigation Report: Submitted to EPA and TDEC on 5/27. Comments due 7/26/25.
- Draft Main Installation Vapor Intrusion Study Report: Submitted to EPA and TDEC on 5/30. Comments due 7/29/25.

Responses to Comments (RTCs)

- None

Documents Requiring Army Revision or Responses to Agency Comments.

- Draft Final FFS, Submitted to EPA and TDEC on 4/1. Comments received from EPA on 5/28. Army preparing RTCs, revised text, and updated figure as discussed during the meeting on 5/29 and as requested by EPA in their 6/2 email.

Upcoming Fieldwork

- None.

The next meeting of the SMT will occur via Microsoft Teams on Tuesday, July 8, 2025, at 11:00 am EDT, 10:00 am CDT, and 8:00 PDT.