

**SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
AUGUST 12, 2025
11:00 EDT**

Army, Base Realignment and Closure Division (DAIN-ISE): Jay Foster (absent)
CALIBRE BEC: Bill Millar

U.S. EPA, Region 4 RPM: Fernando Martinez Torres; Support: Shannon Berg, Ayana Cunningham, James Ferreira

TDEC Division of Remediation, RPM: Jamie Woods

USACE, Mobile: Chase Carter, Melissa Shirley

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. On June 2, EPA requested a revised Alternative 3 text and figure, which Army provided on June 12.

Mr. Martinez Torres thanked Army for a quick response to EPA comments, adding that the review panel was pleased with the changes. He said the reviewers are considering the treatment for vertical contamination. He will send detailed comments as soon as possible.

Revised Proposed Plan (RPP)

Mr. Mokri said the Draft Final RPP was submitted to Army on June 12. Army is waiting on EPA approval of the FFS before finalizing the RPP. The 2025 Site Management Plan (SMP) stated a deadline of July 30 for the Draft Final RPP. EPA extended the deadline based on approval of the FFS.

Record of Decision (ROD) Amendment

The deadline stated in the 2025 SMP for the Draft ROD Amendment is December 1. Mr. Mokri said that deadline will likely need to be extended, since the ROD Amendment depends on approval of the FFS, the RPP and public meeting.

Sampling and Risk Screening

The Draft Sampling and Risk Screening Report was submitted to EPA and TDEC on July 24. Comments are due on September 22.

Vapor Intrusion (VI) Study

The Draft MI VI Study was submitted to EPA and TDEC on May 30. EPA submitted comments August 11. Mr. Woods said he had asked the TDEC VI experts to review the study; he said he will check on the status of the review.

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DUNN FIELD

Remedial Action

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

Mr. Mokri said the 2025 SMP identified a Draft Rebound Monitoring Memorandum with a target date of October 29. He said Army is planning to prepare an addendum to the 2011 Interim Remedial Action Completion Report (IRACR) in place of the memorandum. The addendum is not yet funded, so an extension will likely be necessary.

Dunn Field West

Mr. Mokri stated the Draft DFW VI Study was submitted to EPA and TDEC on May 27. EPA provided comments on August 7. Mr. Woods said he will send a response on behalf of TDEC. Army is preparing a response to EPA comments.

The Final DFW Round 2 Soil Sampling Memorandum was submitted to Army on July 7. The memorandum will be incorporated into the Draft Final Dunn Field Explanation of Significant Differences (ESD).

The Draft Dunn Field ESD was submitted to EPA and TDEC on July 28. Comments are due September 26.

LONG TERM MONITORING (LTM)

The Draft 2024 Annual LTM report was submitted to EPA and TDEC on April 29. TDEC provided approval on July 15. EPA provided comments on July 16. Army is preparing a response to EPA comments and the Draft Final 2024 Annual LTM report with a redline-strikeout (RLSO) version.

Mr. Mokri said the Internal April 2025 LTM Data Report was submitted for Army review on July 2. This is an internal report and will be incorporated into the annual report for 2025.

OTHER ISSUES

Fifth Five-Year Review (FYR) Addendum: Mr. Mokri stated the Fifth FYR deferred protectiveness for groundwater at OU-1 (Dunn Field) due to a potentially complete VI pathway for residences on Rozelle Street. He said that the plan to evaluate protectiveness was to sample soil vapor and determine if contaminants of concern (COCs) are detected in soil vapor that could present a risk. Soil vapor sample results demonstrated an incomplete pathway. Once EPA and TDEC approve the results reported in the DFW VI Study, the Fifth FYR Addendum can be prepared.

Annual Site Inspection: The Draft 2025 Annual Site Inspection report was submitted to EPA and TDEC on July 23. Comments are due September 21.

Community Involvement: No calls received during July.

Administrative Record/Information Repository (AR/IR): The AR/IR Index update is in progress.

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EnviroNews: Army has started the draft story list for the annual newsletter.

PFAS: Mr. Guth stated the Quality Assurance Project Plan (QAPP) was submitted to EPA and TDEC in July with comments due September 16. He said field sampling will occur in late October or November.

Mr. Martinez Torres said EPA is reviewing the QAPP. He stated that the FYR addendum should also include information about the PFAS effort. He said a protective determination would be acceptable. He suggested a meeting with EPA and TDEC prior to preparation of the FYR addendum to discuss any new findings that could be included in the FYR addendum.

Mr. Millar stated that he thought the FYR Addendum was to do with VI at Rozelle Street and wasn't sure what additional data Mr. Martinez Torres was referring to. Mr. Millar said any new data would belong in the Sixth FYR rather than an addendum to the Fifth FYR.

Mr. Martinez Torres agreed that the addendum addresses issues known at the time, but EPA guidance is to include PFAS. Mr. Martinez Torres acknowledged that PFAS is not the primary focus but said it does need to be talked about in the addendum.

Mr. Millar said, given that the PFAS sampling will most likely occur in November, the proposed onsite SMT meeting should be planned for November rather than October. Mr. Martinez Torres agreed, noting that funding might be easier with a November date.

Mr. Martinez Torres proposed that a memo be prepared in the next 10 days stating what extensions are being requested and the reasons for each extension. He said one memo would suffice for all extensions, including the primary documents and any secondary documents. He said it would be helpful to receive this memo in August so that he can update the EPA's tracking system before FY26.

Mr. Holmes stated that the Federal Facility Agreement instructs that all parties request an extension in writing when the party is unable to meet the schedule. He said that EPA has not requested extensions for the delayed comments. He said that Army cannot predict a realistic schedule for the FFS, RPP and ROD, since EPA is still reviewing the FFS and has not provided a date when their reviews will be completed.

Mr. Martinez Torres agreed. He said EPA would send an extension request for the FFS and the subsequent documents, so that all parties can track using the same schedule.

Mr. Millar acknowledged that the FFS has extended farther than expected, with impacts to budgets and funding. He agreed that realistic dates would be useful. He said that if EPA would send an estimated schedule for the FFS, Army would calculate dates for the follow-on documents.

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Action Item Tracking

Upcoming Target Dates (T) and Deadlines (D)	Due Date
	2025 SMP
Draft Final 2024 LTM Report	10/26/25-T
Draft IRACR Addendum	10/29/25-T
Draft 2026 Site Management Plan	12/1/25-D

Prioritized List of Documents For Regulatory Review

Reports

- Draft Annual Site Inspection Report: Submitted to EPA and TDEC on 7/23. Comments due 9/21/25.
- Draft Sampling and Risk Screening Report submitted to EPA on 7/24. Comments due 9/22/25.
- Draft ESD submitted to EPA and TDEC on 7/28. Comments due 9/26/25.

Responses to Comments (RTCs)

- Draft Final FFS. RTCs with updated figures submitted to EPA on 6/12.

Documents Requiring Army Revision or Responses to Agency Comments.

- 2024 Annual LTM Report. Comments received from EPA on 7/16.
- DFW VI Study. Comments received from EPA on 8/7.
- Draft MI VI Study. Comments received from EPA on 8/11.

Upcoming Fieldwork

Contractor	Activity	Dates
HDR	October 2025 LTM	October 1 – 10, 2025
EA	PFAS RI	Late October/November 2025

The next meeting of the SMT will occur via Microsoft Teams on Tuesday, September 9, 2025, at 11:00 am EDT, 10:00 am CDT, and 8:00 PDT.