

SITE MANAGEMENT TEAM MONTHLY CALL SUMMARY
FORMER DEFENSE DEPOT MEMPHIS, TENNESSEE
June 11, 2024
11:00 EDT

Location: Conference Call

Army, Base Realignment and Closure Division (DAIN-ISE) – Jay Foster (Absent)
CALIBRE BEC – Bill Millar
USACE: Mobile –Melissa Shirley, Chase Carter
TDEC Division of Remediation, DDMT Project Manager – Jamie Woods
U.S. EPA, Region 4, DDMT Project Manager – Fernando Martinez-Torres, Ben Bentkowski (absent),
Kevin Koporec (absent)
HDR EOC – Tom Holmes, Clay Mokri, Nancy Jepsen (absent)
Trinity – Larry Pannell
TechLaw – Mac McRae

GENERAL

Mr. Mokri stated that there had been some discussion recently on EPA's preference for document naming consistent with the Federal Facility Agreement. Army has suggested that the documents combine past practice with the FFA naming convention, such that the first submittal of a document include *Revision 0, Draft*, revisions per EPA and TDEC comments would be submitted as *Revision 1, Draft Final, Month Year* based on document submittal, and the final submittal after concurrence to the extent possible submitted as *Revision 1, Final*.

Mr. Martinez-Torres requested that documents should be submitted as Draft, Draft Final and Final with the revision number in parentheses. For example, *Draft (Revision 0), June 2024* or *Draft Final (Revision 1), August 2024*.

MAIN INSTALLATION

FFS Report

Mr. Mokri stated that latest EPA comments were received on April 12 and Army submitted response to EPA on May 23. In an email EPA requested that the MI FFS, Revision 1 Draft Final be submitted in PDF and MS Word formats so that Army can submit a draft Proposed Plan. During a recent Army/EPA call, EPA stated that the FFS will become final after the ROD is signed. It was agreed that Army will submit the FFS as requested and begin the Revised Proposed Plan.

Mr. Martinez-Torres claimed that the 2024 SMP and Army document tracker indicate that the Proposed Plan, Draft (Revision 0) is due today, thus he requested an extension. Mr. Martinez-Torres also requested that the lead agency submit an extension request or propose an update to the SMP master schedule within 20 days for any documents not on schedule for the next three years.

Mr. Millar stated that during yesterday's Army/EPA call, EPA requested that documents include the subject Operable Unit (OU). Mr. Martinez-Torres stated that listing the OUs is not necessary. Mr. Millar stated that the ROD will include a crosswalk table with OUs.

Mr. Holmes noted that Dunn Field is OU1 and MI includes OUs (2, 3, and 4). The MI ROD provides remediation for each OU without designating specific actions for any particular OU. Mr. Holmes also stated that schedule delays are in part due to multiple rounds of comments from EPA. Mr. Martinez-Torres stated that to avoid stipulated penalties, the lead agency needs to request extensions. Mr. Holmes responded that the FFA requires all parties, not just the lead agency, to submit extension requests if schedules won't be met. Mr. Martinez-Torres acknowledged the requirement but noted that stipulated penalties only apply to the lead agency (Army). Mr. Martinez-Torres requested a revised schedule within 20 days.

Mr. Millar stated that the schedule is included in the annual SMPs and document status is updated monthly in Army's document tracker; but that a quarterly schedule revision could also be provided. Mr. Martinez-Torres requested a schedule within the next 20 days for documents within the next 6 months that are not on schedule. Mr. Millar asked if the due date for the requested schedule could be submitted by the next SMT

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meeting in June. Mr. Martinez-Torres stated that since the Proposed Plan is not on schedule, he would like an updated schedule before then. Mr. Millar said that he would provide an extension request for the Proposed Plan.

Sampling and Risk Screening Report

Mr. Mokri stated that Sampling and Risk Screening Report, Revision 1 Final, was submitted to EPA and asked if EPA was planning to submit an approval letter. Mr. Mokri stated that contracting for additional soil sampling is in process.

Mr. Martinez-Torres stated that EPA received a cover letter from Army for the Sampling and Risk Screening Report; but had not received the DoD SAFE link to download the files. Mr. Millar agreed to resend the link so that the files can be downloaded.

Vapor Intrusion Investigation

Mr. Mokri stated that the Indoor air sampling data report is in preparation and that the results from the indoor air sampling were discussed during last SMT call. The next round of indoor air sampling is scheduled for October/November 2024.

DUNN FIELD

Mr. Pannell stated that the latest comments on Year 12 report were received from EPA on May 1 and that Army submitted RTCs, RLSO, and Revision 1 Final to EPA and TDEC on May 30.

Mr. Mokri said that contracting for the Dunn Field West Vapor Intrusion Investigation is in process and that Army is working on an access agreement with the private property owner.

LONG TERM MONITORING

Mr. Mokri stated that the 2023 Annual LTM Rev0 was submitted to EPA and TDEC on February 16. EPA provided comments on March 28 and TDEC approval received on June 7. Army working on the response to EPA comments.

ANNUAL SITE INSPECTION

Mr. Mokri stated that the 2023 Annual Site Inspection Report, Rev 1 Final, was submitted to EPA and TDEC on May 20 and asked if EPA was planning to issue an approval letter. Mr. Mokri stated that HDR started the 2024 Annual Site Inspection on May 30.

OTHER ISSUES

Mr. Mokri stated that well MW-100B, which was damaged during paving at Barnhart, was abandoned the week of May 13. Replacement well MW-331 was constructed the week of May 20 and was sampled last week, the well will be incorporated into the LTM program.

From May 13 through 17, six OSI wells, 15 SVE wells, and 18 VMPs were abandoned by grouting per SCHD permit.

The AR/IR compilation is planned to be completed once the FFS and 2023 Annual LTM report have been finalized.

No calls received on the CIL since May SMT meeting. Army is still receiving EnviroNews returns and is revising the mailing list.

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Mr. Mokri stated that there is no update on PFAS since the last SMT call. The RI is scheduled to be awarded at the end of the 2024 fiscal year.

DOCUMENT AND ACTION ITEM TRACKING FORMS

Mr. Mokri stated that Army is waiting on approval from EPA on three documents: *Sampling and Risk Screening Report*, *AS/SVE Y12 Annual Report*, and *2023 Annual Site Inspection Report*. Mr. Martinez-Torres requested that Army provide a DoD SAFE link for all the documents so that EPA can complete its review.

Mr. Millar asked if EPA approval is necessary for these documents, and Mr. Holmes stated that EPA approval should be received for the Sampling and Risk Screening Report because this is the final report for several of the areas sampled. The additional sampling for dioxins/furans in soil at the PCP Dip Vat area will be presented in a separate report. Mr. Millar stated that EPA approval of the 2023 Annual Site Inspection Report is requested since concurrence on LUC effectiveness is warranted.

UPCOMING FIELDWORK

No field work planned.