



DEFENSE LOGISTICS AGENCY  
DISTRIBUTION  
2001 MISSION DRIVE  
NEW CUMBERLAND, PENNSYLVANIA 17070-5000

IN REPLY  
REFER TO DLA Installation Support  
For Distribution

September 28, 2010

Mr. Turpin Ballard  
Environmental Protection Agency, Region 4  
Office of Solid Waste  
Federal Facilities Branch  
61 Forsyth Street, SW  
Atlanta, GA 30303

Mr. Jamie Woods  
Tennessee Department of Environment and Conservation  
Division of Remediation  
8383 Wolf Lake Drive  
Memphis, Tennessee 38133-4119

Subject: Proposal for Termination, Federal Facilities Agreement Defense Depot  
Memphis, Tennessee

Dear Sirs:

As provided in Section XXXVI.A. of the Defense Depot Memphis Tennessee (DDMT) Federal Facilities Agreement (FFA), the Defense Logistics Agency (DLA) hereby advises the United States Environmental Protection Agency, Region 4 (EPA) and the Tennessee Department of Environment and Conservation (TDEC) of its determination that the objectives of the FFA have been met and proposes that the FFA be terminated.

The objectives of the FFA, as described in Section VII. *Purposes and Scope of Agreement*, are listed on Table 1 with notes regarding status of completion. A list of documents prepared in accordance with the FFA and supporting the determination is provided in Attachment 1.

In accordance with Section XXXVI.B., within 60 days, please provide your concurrence that DLA has completed its obligations under the FFA or your basis for denial and the actions necessary to grant a termination notice.



Should you have any questions regarding this request, please don't hesitate in contacting me at (717) 770-6950 or the HDR|e<sup>2</sup>M Project Manager, Tom Holmes, at (404) 237-3982.

A handwritten signature in black ink, appearing to read 'Michael A. Dobbs', written over a horizontal line.

MICHAEL A. DOBBS

Chief  
Environment, Safety and  
Occupational Health Office

Attachment: Supporting Documentation  
for FFA Termination

cc: John DeBack, Army  
Nannette Werner, DLA

TABLE 1  
PURPOSE AND SCOPE OF FEDERAL FACILITIES AGREEMENT  
PROPOSAL FOR TERMINATION  
Defense Depot Memphis, Tennessee

Item	FFA Statement	Status
<b>A. General Purposes</b>		
1.	Ensure that DLA conducts the work necessary to ensure that the environmental impacts associated with past and present activities at the Site are thoroughly investigated.	RIs approved for all OUs. Additional studies performed during remedial designs and implementation of remedial actions.
2.	Ensure that DLA develops and implements all appropriate response actions as necessary to protect the public health, welfare and the environment.	RODs approved for all OUs and ROD Amendment for OU-1. Approved PCOR documents implementation of all response actions.
3.	Facilitate cooperation, exchange of information and participation of the parties in conducting these actions.	Regular meetings of the the Parties have been held since approval of the FFA and documents have been submitted in accordance with the SMP.
<b>B. Specific Purposes to ensure that DLA in consultation with EPA and TDEC:</b>		
1.	Meet the requirements of Section 120(e)(2) of CERCLA for an interagency agreement among the Parties.	FFA meets the requirements.
2.	Identifies the response action necessary for all identified sites at DDMT.	Selected remedies necessary to meet remedial action objectives were identified in approved RODs.
3.	Identifies OUs and potential OUs which are appropriate at the Site. Potential OUs shall be identified and proposed by the Parties in the Site Management Plan (SMP) as early as possible prior to the formal proposal of OUs via Proposed Plans. OUs and potential OUs shall be established and updated as needed in the SMP.	Potential OUs were identified in the initial 1994 SMP. OUs were proposed in the Proposed Plans and identified in approved RODs.
4.	Implements the work and response action schedules for each OU as required by the SMP.	Schedules set forth in the SMP were met with extensions approved by the Parties as necessary.
5.	Completes a Remedial Investigation (RI) for each OU to determine adequately the nature and extent of the threat to public health or welfare or the environment caused by the release and/or threatened release.	RIs with Baseline Risk Assessments approved for all OUs. Additional studies performed during remedial designs and implementation of remedial actions.
6.	Completes a Feasibility Study (FS) for each OU which identifies and evaluates feasible remedial alternatives for preventing, mitigating or abating the release and/or threatened release.	FSs approved for all OUs and final remedies selected in the RODs. Changes to the remedies for OU-1 were documented in the ROD Amendment.
7.	Identifies the nature, objective and schedule of response actions to be taken at the Site. Response actions shall attain mandated degree of remediation.	Nature, objective and schedule of response actions have been described in remedial designs and/or work plans prior to implementation. Remediation goals for affected media were established in the RODs. Attainment of goals documented in Remedial Action Completion Reports (RACRs) and Interim RACRs.
8.	Implements the selected response action(s) for each OU in a timely manner, and consistent with the applicable ROD to ensure consistency with the ultimate goal of protecting human health, welfare and the environment.	Implementation schedule and consistency with the ROD is documented in RACRs and IRACRs and the PCOR.
9.	Identifies and integrates all federal and state ARARs into the response action process.	ARARs were listed in the approved RODs and ROD Amendment.
10.	Completes any Additional Work which is identified and agreed upon by the Parties.	Additional Work completed as agreed by the Parties.
11.	Coordinates the response action process for each OU with the mission and support activities of DDMT.	DDMT was closed in 1997; all activities were coordinated through DLA.

**ATTACHMENT 1  
SUPPORTING DOCUMENTS  
PROPOSAL FOR FFA TERMINATION  
Defense Depot Memphis, Tennessee**

**Site-Wide Documents**

Defense Depot Memphis Tennessee, 1994. *Site Management Plan*. Prepared for Defense Logistics Agency. September 1994.

CH2M HILL, 2003. *Memphis Depot Dunn Field Five Year Review, Revision 2*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. October 2003.

e<sup>2</sup>M, 2008. *Second Five Year Review, Revision 1*. Prepared for the Air Force Center for Engineering and the Environment. January 2008.

HDR|e<sup>2</sup>M, 2009. *BRAC Cleanup Plan, Version 13, Defense Depot Memphis, Tennessee, Revision 0*. Prepared for the Air Force Center for Engineering and the Environment. December 2009.

United States Environmental Protection Agency (USEPA), 2010. *Preliminary Close Out Report, Defense Depot Memphis, Tennessee, EPA ID No. TN4210020570*. February 2010.

USEPA, 2010. *Sitewide Ready for Anticipated Use, Memphis Defense Depot, EPA ID No. TN4210020570*. May 2010.

**Dunn Field – OU1**

Response Actions

UXB International, 2001. *Final Chemical Warfare Material Investigations/Removal Report*. 2001.

Jacobs Federal Programs. *Removal Action at Former Pistol Range, Site 60*. Prepared for U.S. Army Corps of Engineers Mobile District, Mobile, Alabama. August 2003

Remedial Investigation/ Feasibility Study

CH2M HILL, 2002. *Memphis Depot Dunn Field Remedial Investigation Report – Volumes I through III*. Prepared for the Defense Logistics Agency and presented to U.S. Army Engineering and Support Center, Huntsville, Alabama. July 2002.

CH2M HILL, 2003a. *Memphis Depot Dunn Field Feasibility Study Report*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2003.

Records of Decision

CH2M HILL., 1996. *Record of Decision for Interim Remedial Action of the Groundwater at Dunn Field (OU-1) at the Defense Distribution Depot Memphis*. Prepared for U.S. Army Corps of Engineers, Huntsville Division.

CH2M HILL, 2003. *Memphis Depot – Dunn Field Proposed Plan*. Defense Distribution Center (Memphis). Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2003.

CH2M HILL, 2004b. *Final Dunn Field Record of Decision*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. March 2004.

e<sup>2</sup>M, 2009b. *Dunn Field Record of Decision Amendment, Revision 3*. Prepared for the Air Force Center for Engineering and the Environment. January 2009.

Remedial Design/ Remedial Action

CH2M HILL. *Groundwater Interim Remedial Action, Defense Depot, Memphis, Tennessee: Final Remedial Design*. Prepared for the U.S. Army Corps of Engineers, Huntsville Division. August 1997.

CH2M HILL. *Updated Groundwater Interim Remedial Action, Defense Depot, Memphis, Tennessee: Final Remedial Design*. Prepared for the U.S. Army Corps of Engineers, Huntsville Division. January 2000.

CH2M HILL, 2004. *Early Implementation of Selected Remedy Component to Address Groundwater Contamination West of Dunn Field*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. March 2004.

CH2M HILL, 2004. *Rev. 1 Dunn Field Disposal Sites Final Remedial Design*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. April 2004.

MACTEC Engineering and Consulting, Inc. (MACTEC), 2004. *Dunn Field Disposal Sites Remedial Action Work Plan, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. October, 2004.

MACTEC, 2004. *Early Implementation of Selected Remedy Work Plan, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. November, 2004.

MACTEC, 2005. *Early Implementation of Selected Remedy Interim Remedial Action Completion Report, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. September, 2005.

MACTEC, 2006. *Dunn Field Disposal Sites Remedial Action Work Plan Addendum 1, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. January, 2006.

MACTEC, 2006. *Dunn Field Disposal Site Remedial Action Completion Report, Revision*. Prepared for the Air Force Center for Environmental Excellence. July, 2006.

CH2M HILL, 2007. *Memphis Depot, Dunn Field Source Areas Remedial Design*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. April 2007.

e<sup>2</sup>M, 2007. *Dunn Field Source Areas Fluvial Soil Vapor Extraction Remedial Action Work Plan, Rev. 1*. Prepared for the Air Force Center for Environmental Excellence. May 2007.

CH2M HILL, 2008. *Memphis Depot Dunn Field Off Depot Groundwater Final Remedial Design*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. September 2008.

e<sup>2</sup>M, 2009. *Annual Operations Report – 2008, Dunn Field Groundwater Interim Remedial Action – Year Ten*. Prepared for the Air Force Center for Engineering and the Environment. March 2009.

e<sup>2</sup>M, 2009. *Dunn Field Off Depot Groundwater Remedial Action Work Plan, Defense Depot Memphis, Tennessee, Revision 2*. Prepared for the Air Force Center for Engineering and the Environment. April 2009.

e<sup>2</sup>M, 2009. *Operating Properly and Successfully Demonstration, Source Areas Remedial Action, Dunn Field - Defense Depot Memphis, Tennessee*. Prepared for the Air Force Center for Engineering and the Environment. June 2009.

HDR|e<sup>2</sup>M, 2009. *Source Areas Interim Remedial Action Completion Report, Dunn Field - Defense Depot Memphis, Tennessee, Revision 1*. Prepared for the Air Force Center for Engineering and the Environment. September 2009.

Property Transfer

MACTEC, 2004. *Finding of Suitability to Transfer 4, Dunn Field, Defense Distribution Center (Memphis)*. Prepared for the Air Force Center for Environmental Excellence. March 2005.

HDR|e<sup>2</sup>M, 2010. *Finding of Suitability to Transfer 5, Dunn Field, Defense Distribution Depot Memphis, Tennessee*. Prepared for the Air Force Center for Engineering and the Environment. May 2010.

### **Main Installation – OUs 2, 3 and 4**

#### Response Actions

Jacobs-Sverdrup Inc, 2000. *Remediation Report, Removal Action in Parcels 35 and 28 (Old Paint Shop and Maintenance Area), Former Defense Distribution Depot, Memphis*. Prepared for U.S. Army Corps of Engineers, Mobile. September 2000.

Jacobs Engineering Group, 2001. *Decontamination Report and Certification for Closure of Permitted Container Storage Facility (Building T-308)*. Prepared for U.S. Army Corps of Engineers, Mobile. November 2001

Jacobs Federal Programs, 2002. *Remediation Report, Removal Action at Building 949, Former Defense Distribution Depot, Memphis*. Prepared for U.S. Army Corps of Engineers, Mobile. February 2002.

O.H. Materials Company, 1986. *Summary Report, On-Site Remedial Activities at the Defense Depot Memphis*. Prepared for Defense Logistics Agency. February 1986.

OHM/IT Remediation Services, Inc. (OHM/IT), 1999. *Post Removal Report: Contaminated Soil Remediation Family Housing Area, Memphis Depot, Tennessee, Volumes I and II*. Prepared for U.S. Army Corps of Engineers, Mobile. March 1999.

OHM/IT, 1999. *Post Removal Report: Contaminated Soil Remediation Cafeteria Building, Memphis Depot, Tennessee*. Prepared for U.S. Army Corps of Engineers, Mobile. March 1999.

CH2M HILL. *Final Engineering Evaluation/Cost Analysis (EE/CA) Old Paint Shop and Maintenance Areas Parcels 35 and 28*. Former Defense Distribution Depot Memphis, Tennessee. Prepared for U.S. Army Engineering and Support Center, Huntsville, Alabama. August 1999.

Jacobs-Sverdrup, Inc. *Remediation Report Removal Action in Parcels 35 and 28 (Old Paint Shop and Maintenance Area), Former Defense Distribution Depot, Memphis*. Prepared for the U.S. Army Corps of Engineers, Mobile District. September 2000.

#### Remedial Investigation/ Feasibility Study

Law Environmental, 1990. *Defense Distribution Depot Memphis, Tennessee (DDMT) Remedial Investigation Final Report*. Prepared for U.S. Army Corps of Engineers, Huntsville, Alabama. August 1990.

Law Environmental, 1990. *Final Feasibility Study for the Defense Distribution Depot, Memphis, Tennessee*. Prepared for U.S. Army Corps of Engineers, Huntsville, Alabama. September 1990.

CH2M HILL, 2000. *Final Main Installation Remedial Investigation Report- Volumes I through IV*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. January 2000.

CH2M HILL. *Memphis Depot – Main Installation Groundwater Feasibility Study Report - Final*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. July 2000.

CH2M HILL. *Memphis Depot – Main Installation Soils Feasibility Study Report - Final*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. July 2000.

#### Record of Decision

CH2M HILL, 2000. *Memphis Depot – Main Installation Proposed Plan*. Memphis Depot Caretaker. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. August 2000.

CH2M HILL, 2001. *Memphis Depot Main Installation Record of Decision Rev. 2*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. February, 2001.

#### Remedial Design/ Remedial Action

CH2M Hill, 2002. *Memphis Depot Main Installation Remedial Design Workplan, Revision 2*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. July 2002.

CH2M Hill, 2004. *Memphis Depot Main Installation Final Remedial Design, Revision 1*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. July 2004.

MACTEC Engineering and Consulting, Inc (MACTEC), 2005. *Main Installation Remedial Action Work Plan, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. July, 2005.

e<sup>2</sup>M, 2006. *Main Installation Remedial Action Construction Report, Defense Depot Memphis, Tennessee, Rev. 0*. Prepared for the Air Force Center for Environmental Excellence. December, 2006.

e<sup>2</sup>M, 2008. *Main Installation Enhanced Bioremediation Treatment, Year One Remedial Action Operations Report, Revision 0*. Prepared for the Air Force Center for Engineering and the Environment. July, 2008.

e<sup>2</sup>M, 2008. *Main Installation Source Area Evaluation, Revision 0*. Prepared for the Air Force Center for Engineering and the Environment. March, 2008.

e<sup>2</sup>M, 2009. *Main Installation Source Area Investigation, Revision 0*. Prepared for the Air Force Center for Engineering and the Environment. February, 2009.

HDR|e<sup>2</sup>M, 2010. *Main Installation Enhanced Bioremediation Treatment, Year Two Remedial Action Operations Report, Revision 1*. Prepared for the Air Force Center for Engineering and the Environment. February, 2010.

HDR|e<sup>2</sup>M, 2010. *Interim Remedial Action Completion Report, Main Installation, Defense Depot Memphis, Tennessee, Rev. 1*. Prepared for the Air Force Center for Engineering and the Environment. February, 2010.

#### Long Term Monitoring

MACTEC, 2006. *Annual Long-Term Monitoring Report, Main Installation, Revision 1*. Prepared for the Air Force Center for Environmental Excellence. February 2006.

HDR|e<sup>2</sup>M, 2010. *Annual Long-Term Monitoring Report-2007, Main Installation, Revision 1*. Prepared for the Air Force Center for Engineering and the Environment. February, 2010.

HDR|e<sup>2</sup>M, 2010. *Annual Long-Term Monitoring Report-2008, Main Installation, Revision 1*. Prepared for the Air Force Center for Engineering and the Environment. February, 2010.

HDR|e<sup>2</sup>M, 2010. *Annual Long-Term Monitoring Report – 2009, Main Installation, Revision 0*. Prepared for the Air Force Center for Engineering and the Environment. February, 2010.

#### Property Transfer

Memphis Depot Caretaker, 2000. *Finding Of Suitability To Transfer 1, Main Installation, Defense Distribution Depot Memphis, Tennessee*. Prepared for Defense Logistics Agency. September 2000.

Memphis Depot Caretaker, 2001. *Finding Of Suitability To Transfer 2, Main Installation, Defense Distribution Depot Memphis, Tennessee*. Prepared for Defense Logistics Agency. May 2001

CH2M HILL, 2004. *Finding Of Suitability to Transfer 3, Main Installation, Defense Distribution Center (Memphis)*. Prepared for the U.S. Army Engineering and Support Center, Huntsville, Alabama. May 2004.

HDR|e<sup>2</sup>M, 2010. *Finding of Suitability to Transfer 6, Main Installation, Defense Distribution Depot Memphis, Tennessee*. Prepared for the Air Force Center for Engineering and the Environment. July, 2010.