



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 114



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June 6, 1995

Mr. Frank Novitzki
Defense Distribution Depot
Environmental Protection and Safety
DDMT-DE
2163 Airways Blvd.
Memphis TN 38114-5210

Re: Considerations for possible release of chemical warfare constituents during activities conducted in Dunn Field.

Dear Mr. Novitzki:

As Co-Chair of the Restoration Advisory Committee I want to thank both you and Ms. Kartman for being forthcoming with the above mentioned issue when we spoke on May 26. The Depot is in a difficult position from a community relations standpoint regardless of what it does. Therefore I will make the following recommendations to the Depot regarding what I think is the correct and moral thing to do in light what is known and what is not known about the existence of chemical warfare components in Dunn Field.

What is known is that chemical weapons have been brought into the facility in times past. (See enclosed article). If this was done once it is reasonable to assume it could have been done more than once. You also know the identity of some of the items buried in the Dunn Field. However I don't believe anyone would stake the lives or health of themselves or others on the belief that the list is complete and exclusive.

What is not known is whether or not any chemical weapons or parts thereof, made their way into the Dunn Field burial pits. Additionally, there are likely thousands of pounds of material in the Dunn Field pits whose identity will not be known until they are unearthed. The Memphis Depot is an old facility that has handled millions of pounds of material and produced a lot of waste material in the process.

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The concern is as follows: That during the process of drilling new monitoring wells and to a lesser extent, during the excavation activities in Dunn Field, there is a possibility that chemical weapons materials could be unearthed or punctured and a release could occur.

As a guiding principle the Depot should plan for the worst and hope for the best, to do anything less is morally unacceptable.

The Depot must fully disclose the possibility of a release of chemical weapons material to the community closest to the site. This should include informing residents of options such as leaving for the day when work is commenced, staying in doors etc. You must always remember that the residents surrounding the Dunn Field didn't have a choice in the decision as to what was dumped in the Dunn Field site. They should have complete control as to the level of risk they expose themselves to during the course of the Depot's Dunn Field work.

The Rozelle area adjacent to the Dunn Field site needs special planning considerations. This small section of street is a dead-end street to the west of Dunn Field. There are 16 homes, a small business and a church on this street. This tiny community is unique in its isolation. It is physically impossible to walk out of the community on two sides. A very busy railroad crossing cuts diagonally across the neighborhood. When a train is passing no one can enter or leave the community by any means other than wading through a 6 foot drainage culvert under the railroad bed. This communities isolation must be planned for in case of the need to evacuate due to a release. This should include at a minimum, notification to the railroad, fire department and local emergency personnel of the commencement of work. There are several elderly people who live on Rozelle.

In summary the Depot's community relations plan should:

1. Fully disclose the possibility of a release of toxic materials, however slight, to the surrounding home owners by mail or hand delivered to their doors.

In regards to the work itself:

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1. All work, both drilling and future excavation should be tented. There are very large portable tents available that can be used to shroud the work and better contain a release if it occurs.

2. The number of new monitoring wells should be kept to a minimum or eliminated if at all feasible.

3. Remote sensing should be set up surrounding the site. This would detect any material that is moving off site as a cloud or vapor,

4. The use of nearby sirens should be secured and utilized in case of an emergency.

5. If the Depot's research indicates that the risk of contacting chemical weapons materials in Dunn Field is more certain then the option of not removing the materials should be considered. A pump and treat system could be initiated as planned and expanded so as to keep the plume from ever leaving the site. I realize the problem with this plan of action as a sole treatment for Dunn Field. There would be a possibility that chemical weapons materials could be in the plume itself and work its way into the pump and treat system and thus be released into the environment. This plan may only put off the inevitable which is the removal of the material, whatever it is, from Dunn Field. This brings me back to my primary point which is to plan for the community's safety.

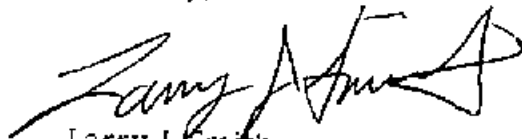
I would like to close by pointing out the primary difference in the emergency planning assumptions in the Dunn Field situation versus that of a plant which stores and uses large quantities of extremely hazardous substances. From the community's standpoint they can find out what chemicals are used in a plant and demand that they use substitutes, or smaller quantities or stop using the material all together. They can do this through the political and legal process. The company is not directly accountable to a nearby community. From a company's standpoint they know what chemicals they use, they have emergency procedures in place for internal problems and carry catastrophic insurance in the event they destroy a segment of the community. The companies are accountable to their shareholders first, that is why the company makes whatever it makes.

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In the Dunn Field case, no one but the individual who physically dumped the material knows what went into that field. So, from the communities standpoint information is virtually impossible to get and thus a choice as to the risk level they desire to put themselves in is impossible. The Depot stands in the shoes of a company. You are accountable to the community directly thus your assumptions regarding the community should hinge on safety at the utmost level.

If you have any questions please call me 901-452-6997.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry J. Smith", written in a cursive style.

Larry J. Smith
RAB Co-Chair

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