



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

May 6, 2016

MEMORANDUM FOR: PAMELA HUDSON-LINDSEY
Shelby County Pollution Control

SUBJECT: Air Emissions Permit Exemption, Defense Depot Memphis, Tennessee

1. The purpose of this memorandum is to request an exemption from Air Pollution Control permitting requirements based on emissions below de minimus levels. The Department of the Army (Army) maintains two remedial action systems at Defense Depot Memphis, Tennessee (DDMT): the Fluvial Soil Vapor Extraction (FSVE) system at 1716 Dunn Avenue and the Off-Depot Air Sparge/Soil Vapor Extraction (AS/SVE) system at 1605 Menager Road. The systems are maintained for the Army by HDR through a contract with the U.S. Army Corps of Engineers. The two systems operate under Operating Permit #01030-01P issued by the Shelby County Health Department (SCHD), which expires May 9, 2016. Operations are currently expected to continue through 2017.
2. The 2015 Annual Emissions Report was submitted on March 11, 2016. As stated in the report, the emissions rate ranged from 0.0008 to 0.0011 pounds per hour (lb/hr) in 2015. The emissions rate has not exceeded 0.01 lb/hr since 2009. I understand the emissions limit for permit exemption is 0.1 lb/hr. Based on past emissions rates as documented in annual emissions reports since 2008, the Army requests an exemption from the requirement to maintain an operating permit. The Army will continue to have its contractors monitor system operations and emissions.
3. For more information, please contact the HDR Project Manager, Tom Holmes, at (404) 295-3279.

CAROLYN JONES
Program Manager
Base Realignment and Closure Division