

DEPARTMENT OF THE ARMY

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

10 March 2017

MEMORANDUM FOR Former Restoration Advisory Board Members, U.S. Environmental Protection Agency and Tennessee Department of Environment and Conservation Officials

SUBJECT: Notification of Five-Year Review, Defense Depot Memphis, Tennessee

1. This memorandum is provided to notify you that the Department of the Army is conducting a Five-Year Review under the Comprehensive Emergency Response, Compensation and Liability Act (CERCLA) for the selected remedies at:

Former Defense Depot Memphis, Tennessee (DDMT) 2163 Airways Boulevard Memphis, Shelby County, Tennessee

- 2. The purpose of this Five-Year Review is to determine whether the remedies at the Former DDMT remain protective of human health and the environment. The methods, findings, and conclusions of the review will be documented in a Five-Year Review report, and if any issues are identified, recommendations will be provided to address them.
- 3. The selected remedies for DDMT were described in the Main Installation Record of Decision approved in 2001, the Dunn Field Record of Decision approved in 2004, and the Dunn Field Record of Decision Amendment approved in 2009. The contaminants of concern are metals, petroleum hydrocarbons and volatile organic compounds (VOCs) in soil and chlorinated volatile organic compounds (CVOCs) in groundwater. The selected remedy for the Main Installation was:
 - Excavation, transportation, and off-site disposal of lead-contaminated surface soil near Building 949.
 - Deed restrictions and site controls on residential land use, daycare facilities, drilling and groundwater use, and site access.
 - Enhanced bioremediation of CVOCs in the most contaminated part of the groundwater plume.
 - Long-term groundwater monitoring.

The selected remedy, as amended for Dunn Field included:

- Excavation, transportation, and disposal of soil and material within disposal sites.
- Soil vapor extraction (SVE) to reduce VOC concentrations in subsurface soils.
- Injection of zero-valent iron within Dunn Field to treat CVOCs in the most contaminated part of the groundwater plume and installation of an air sparging and SVE system to remediate CVOCs within the off site areas of the groundwater plume.



- Monitored natural attenuation and long-term groundwater monitoring.
- Implementation of land use controls consisting of deed and/or lease restrictions;
 Notice of Land Use Restrictions; zoning restrictions and groundwater well restrictions.
- 4. All selected remedies have been implemented. Construction, operation and performance monitoring for the remedies were documented in interim remedial action completion reports, which were reviewed and approved by the U.S. Environmental Protection Agency (USEPA) and Tennessee Department of Environment and Conservation (TDEC). Additional site information is available at the Information Repository at TDEC's office at 8383 Wolf Lake Drive, Bartlett, TN 38133, (901) 371-3000. Please call ahead for an appointment. TDEC staff will assist you in viewing documents. You may also find information online at: http://www.epa.gov/region4/superfund/sites/fedfacs/memdedpttn.html.
- 5. The implemented remedies have either met cleanup standards or are making progress toward the standards, except for groundwater contamination on the Main Installation. Enhanced bioremediation was implemented on the Main Installation in 2006 to 2009 and 2012 to 2014. While concentrations of groundwater contaminants were reduced, the reductions were not sufficient to meet the cleanup standards. A Supplemental Remedial Investigation is currently being performed, and a Focused Feasibility Study will be performed upon completion of the Investigation to develop a remedial strategy to achieve cleanup standards throughout the Main Installation. The supplemental investigation includes document review to examine the basis for the selected remedy and field investigation to improve the site hydrogeological model and delineation of contaminant plumes and to evaluate potential off-site impacts to groundwater. Further investigation is planned in 2017 and will include additional monitoring wells, groundwater modeling, risk assessment and vapor intrusion study. All activities are being performed with review and concurrence from USEPA and TDEC. Further remedial action will be conducted after the feasibility study is completed and the selected remedy has been confirmed or revised.
- 6. The National Contingency Plan requires that remedial actions that result in any hazardous substances, pollutants or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure be reviewed every five years to ensure the protection of human health and the environment. This is the fourth Five-Year Review for the Former DDMT and is to be signed by January 23, 2018. Notification of report completion and availability for public review will be provided at that time.
- 7. The Department of the Army invites community participation in the Five Year Review process. If you would like further information or to comment on the protectiveness of the selected remedy or the remedial actions at DDMT, please call the Community Involvement Line at (901) 774-3683 or send an email to denise.cooper@hdrinc.com. Comments will be accepted through May 15, 2017.
- 8. A public notice inviting comments from the community for the Five-Year Review will be published in the *Memphis Commercial Appeal* on March 15, 2017.

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9. For additional information please contact: Mr. Tom Holmes, HDR Project Manager at (404) 295-3279, email: thomas.holmes@hdrinc.com; or Ms. Joan Hutton, BRAC Environmental Coordinator at (571) 403-3308, email: joan.hutton@calibresys.com.

Program Manager,

Base Realignment and Closure Division

CC:

Elected Officials

The Honorable Jim Strickland, Mayor of the City of Memphis
The Honorable Mark H. Luttrell, Jr., Mayor of Shelby County
Councilman Joe Brown, Memphis City Council Super District 8 - Position 1
Councilwoman Janis Fullilove, Memphis City Council Super District 8 - Position 2
Councilman Martavius Jones, Memphis City Council Super District 8 - Position 3
Councilwoman Jamita Swearengen, Memphis City Council District 4
Commissioner Reginald Milton, Shelby County Board of Commissioners District 10

Civic Representatives

Dr. Tyler Zerwekh, Shelby County Health Department

Mr. Reid Dulberger, Economic Development Growth Engine

Mr. Tom Winford, Memphis Light, Gas and Water

Former Restoration Advisory Board Community Representatives

Mr. Dave Bond

Ms. Doris Bradshaw

Ms. Peggy Brooks

Reginald Eskridge, Esquire

Mr. Ulysses Truitt

Mr. Stanley Tyler

Mr. Mondell Williams

Ms. Elizabeth Young

Regulatory Agency Representatives

Ms. Diedre Lloyd, U.S. Environmental Protection Agency, Region 4

Mr. Jamie Woods, Tennessee Department of Environment and Conservation