

**OFF-DEPOT GROUNDWATER  
REMEDIAL ACTION  
SOIL VAPOR MONITORING  
COMMUNITY RELATIONS PLAN  
Defense Depot Memphis, Tennessee**

**Prepared for:**



**Defense Logistics Agency**



**AFCEE Contract FA8903-08-D-8771  
Task Order No. 0019**



*Your Goal...Our Mission*

**July 2009  
Revision 0**

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## **Section 1 – Overview of Off-Depot Soil Vapor Monitoring Community Relations Plan**

The Defense Logistics Agency (DLA) developed an updated *Community Involvement Plan* [CIP], (MACTEC, 2005) to facilitate two-way communication between the community surrounding the former Memphis Depot and DLA, and to encourage community involvement in the site activities.

This community relations plan is based on guidance outlined in that document to ensure that residents are continuously informed and provided opportunities to be involved during air vapor monitoring associated with the Off-Depot Groundwater remedial action (RA).

Specific objectives and goals of this plan mirror those of the original CIP:

### Objectives

- Provide the community with environmental information
- Maintain two-way communication between the Depot and its neighbors
- Respond to community concerns and needs that may arise during Depot cleanup efforts
- Provide effective management of the community involvement program

### Goals

- Building positive interest in the cleanup program
- Building community awareness about community involvement opportunities
- Maintaining regular information channels

Additionally, the following information sources were drawn upon to develop a course of action consistent with the CIP: Rev. 3 Dunn Field Record of Decision Amendment (January 2009) and the Rev. 1 Off-Depot Groundwater Remedial Action Work Plan (RAWP) (March 2009). Additional support, consultation, and coordination were provided by the Defense Distribution Center (DDC), the U.S. Environmental Protection Agency (U.S. EPA), and the Tennessee Department of Environment and Conservation (TDEC).

### **1a. Purpose of This Plan**

Acting within the guidance of the CIP, the purpose of this plan is to:

- Provide nearby community information about RA, specifically AS/SVE construction activities and vapor monitoring
- Provide additional information to property owners and residents within the survey areas about vapor monitoring and obtain access for structural survey, and where appropriate, procure vapor monitoring and sub-slab pressure measurements

By virtue of its implementation, meet requirements set forth in Paragraph 2.1.6 of the Rev. 1 Off-Depot Groundwater RAWP (March 2009) to conduct community relations activities during the RA in accordance with the CIP.

## Section 2 – Summary of Communication Needs

The DDC is seeking to gain access to private property from the property owners to conduct a survey of the structures on those parcels and to conduct soil vapor monitoring in support of the Off-Depot Groundwater remedial action.

- Contact owners as well as occupants of the properties regarding the proposed survey work
- Disseminate information about the survey work to neighbors adjoining the proposed survey properties to eliminate or minimize potential concern with the survey work being performed
- Create a table to track contacts and provide results to the BRAC Cleanup Team.

For the Off-Depot area, DDC will implement the public affairs activities described below. As previously noted, the following plan takes into account not only the current CIP guidance, but the scope of planned Off-Depot actions as outlined in the RAWP as well. It also attempts to address those concerns identified in the CIP as being important to the community.

## Section 3 – The Issues

### Issue #1: Key Messages

The following key messages have been developed to give the community the information of greatest interest that is concise, understandable, and consistent with past themes advanced in the CIP. The following messages will be incorporated into all materials (fact sheets, news releases, talking points, web site, presentations, etc.) relative to this action.

1. Vapor monitoring activities will soon begin just west of Dunn Field. Activities are currently scheduled to begin on or about July 31, 2009.

- a. Monitoring will be focused on three (3) small residential areas defined as follows:

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

- b. These activities are part of proactive measures developed by the project team from published guidance and approved by EPA and TDEC.
- c. The objective of the survey in the Off-Depot area is to determine whether the existing groundwater plume has resulted in contaminant concentrations in soil vapor which could create residential air quality issues.

2. The intent is to assess soil vapor quality near residential structures in the vicinity of a potentially affected area.

- a. A plume containing chlorinated volatile organic compounds (CVOC) levels that exceed the maximum contaminant levels for drinking water extends west from the former Memphis Depot site.
  - b. Soil vapor quality will be assessed both before and just after AS/SVE operations begin to evaluate the potential impact on residential air quality.
  - c. Depending on the survey results, either no further sampling may be required, or a risk analysis and testing of residential air will be considered.
3. For most residents, surveying, potential sampling, or monitoring activities and associated impacts will be minimal.
  - a. To longtime residents, surveying, potential sampling, or monitoring activities will appear very similar to monitoring actions previously conducted in this area as part of the former Memphis Depot remediation project.
  - b. As with past studies, the results of these activities will be published and maintained in the information repository for the former Memphis Depot.

## **Issue #2: Communicating the Information (Transmission)**

The following methods will be used to effectively disseminate information to affected parties.

1. Using the address list contained in Appendix A of this plan, send via USPS a certified letter (and a similar first class letter to the property owners within the survey areas seeking permission for access to their properties (See Appendix C)The letters should include the following enclosures:

<b>Enclosures for Letters to Property Owners/Occupants</b>	
<b>Property Owner Enclosures</b>	<b>Property Occupant Enclosures</b>
Right-Of-Entry	***
Aerial Image of Survey Areas (from Appendix B)	Aerial Image of Survey Areas (from Appendix B)
Off-Depot Soil Vapor Monitoring Fact Sheet	Off-Depot Soil Vapor Monitoring Fact Sheet
Air Sparging and Soil Vapor Extraction Fact Sheet	Air Sparging and Soil Vapor Extraction Fact Sheet

- For the two properties listed under one owner a single letter referencing both property addresses should be sufficient
  - For the four properties listed as county-owned, one letter listing the four residence addresses should suffice
  - For those four property owners who do not reside at the sampling residences, send a first class letter to the occupants with similar details and let them know that DDC has contacted the property owners. The letter also encourages them to contact the property owners as well
2. Based on USPS certified responses and Right-Of-Entry Forms received, contact remaining property owners by phone (where available [see Appendix B] ) to see what questions they may have regarding the RoE permits, and what if anything we can do to assist in a positive outcome. If a property owner indicates a refusal to provide access, record the decision and report to HDR|e2M for processing.

- a. Self-addressed stamped envelopes will be included with each mailing to the property owners. The address to which the signed Right-of-Entry Forms will be mailed to is:

Former Memphis Depot Survey Response  
ATTN: Community Outreach Room  
2245 Truitt Street  
Memphis TN 38114

3. Additionally, it is recommended - by house-to-house hand delivery (i.e. door hangers) - to provide the Off-Depot Soil Vapor Monitoring and Air Sparging and Soil Vapor Extraction fact sheet to nearby residents to ensure they have information on the vapor monitoring process. Distribution would be made to the following 24 residences:

**Area 1 (Cassaretto M Subdivision)** – All properties located on the west side of Rozelle Street south of Menager Road to the street’s end (except for the one property on the northwest end of that same street section already identified for sampling). Plus those properties extending south from those three properties identified for sampling on the northwest end of the street. This would cover approximately ten residences.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the west side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first seven residences, plus the four residences running south of the three selected survey properties on the east side of Meadowhill – a total of 11 residences.

**Area 3 (Dilatush and Crane Subdivision)** – Those four properties located on the west side of Ragan Street extending north of the Oak Hill Missionary Baptist Church, just beyond those homes identified as part of the survey area. As this location is directly across from the Memphis Light Gas and Water (MLGW) substation, no further distribution would be required.

Enclosures in Hangers for Nearby Residents
Off-Depot Soil Vapor Monitoring Fact Sheet
Air Sparging and Soil Vapor Extraction Fact Sheet
Aerial Image of Survey Areas (from Appendix B)

- a. Should the air vapor monitoring announcements meet with unusually high resistance from the residents, DDC might also consider contacting the Oak Hill Missionary Baptist Church – one of the survey structures – to host a meeting for residents of all three survey areas if residents in the survey areas indicate an interest to obtain more information. At this meeting:
  - Subject matter experts could brief and answer questions on upcoming activities and could provide displays of the boring equipment, probes, and associated tools workers will use
  - Depending on the time it takes to conduct a boring procedure (and if the church allows), an actual demonstration of an outdoor probe placement for residents could also allay a host of perceived concerns
4. Send a media advisory (see Appendix E) to media outlets (determined by DDC Public Affairs), notifying them of upcoming activities in the area.
  - a. If the idea of the church meeting is pursued, invitations to local media would also provide useful visuals for a news story. Stacy Umstead is point of contact for further media queries.

<b>Enclosures Media Advisory</b>
Off-Depot Soil Vapor Monitoring Fact Sheet
Air Sparging and Soil Vapor Extraction Fact Sheet
Aerial Image of Survey Areas (from Appendix B)

- b. IMS will check periodically with DDC Public Affairs to track the number and types of media queries.

5. Post copies of the media advisory and fact sheets (at a minimum) to the DDC web site.

6. Copies of the letters, advisories and fact sheets should also be courtesy copied to both Federal and local elected officials, members of the former Memphis Depot BRAC Cleanup Team (BCT) and members of the Restoration Advisory Board for their information.

<b>Enclosures to Federal/Local Elected Officials Restoration Advisory Board BRAC Cleanup Team</b>
Letter to Property Owners
Right-Of-Entry Form
Off-Depot Soil Vapor Monitoring Fact Sheet
Air Sparging and Soil Vapor Extraction Fact Sheet
Media Advisory
Aerial Image of Survey Areas (from Appendix B)

7. Timing: For a schedule of tasks and implementation, please refer to the Air Vapor Monitoring Public Affairs Action Checklist in Appendix H.

### **Issue #3: Communications Vehicles**

Appendices to this plan contain draft correspondence for each of the types of documents identified here (letters to property owners and occupants, media advisories, fact sheets and talking points) as well as media contact lists. These selected communications vehicles will be staffed, approved and where appropriate signed by DDC. Copies of signed documents required for mailing will be returned to the contractor and disseminated in accordance with the Air Vapor Monitoring Community Public Affairs Action Checklist (Appendix H)

1. Should the church meeting idea be pursued, it is recommended that a transcriptionist be on hand to ensure that responses to any questions or concerns raised during this session are reviewed, answered, and those answers are posted on the web site.

### **Issue #4: Metrics**

To ensure communications objectives are met, the following procedures will be used to assess the effectiveness of these activities:

1. Document the number of approvals/disapprovals/non-responses from property owners regarding property access for inclusion in after action report to DDC.
2. This information should be combined with any calls registered on the Community Information Line, as well as media queries received to form an assessment of the effectiveness of communications efforts, lessons learned, and recommendations to improve community involvement efforts.

3. A completed report will be drafted, staffed and transmitted to the client through HDR|e2M.

#### **Issue #5: Other Associated Activities**

To ensure best management practices are observed, the following community involvement methodologies will be used to support this plan.

1. Community Information Line – Current protocols for the former Memphis Depot Community Information Line are in place, are adequate to handle queries received relative to this action, and will be utilized.
2. Former Memphis Depot Web Site –Copies of all information noted here as well as any supplementary documentation that will help facilitate and aid understanding of sampling activities will be posted utilizing current protocols to: <http://www.ddc.dla.mil/environmental/Memphis/default.aspx>.
3. Information Repository: Documents related to this action will be placed in the repository following DDC/BCT approval in accordance with existing protocols.
4. Contacts and Interested Parties: Appendix A to this plan includes the following officials for mailings relative to this action:
  - Federal elected officials
  - Local officials
  - Former Memphis Depot environmental cleanup program members:
  - Former Memphis Depot Restoration Advisory Board community members
  - Local media

(NOTE 1: All local media contact will be handled by DDC Public Affairs. Please see the Media Outlets List in Appendix F of this plan.)

(NOTE 2: For a list of what enclosures will be forwarded to which interested parties, refer to Issue #2 above.)

#### Appendices to This Plan:

Appendix A – Address List for Contacts and Interested Parties

Appendix B – Map of Sampling Areas and Verified List of Property Owners

Appendix C –Letters to Property Owners and Occupants

Appendix D –Fact Sheets

- Off-Depot Soil Vapor Monitoring
- Air Sparging and Soil Vapor Extraction

Appendix E –Right-Of-Entry

Appendix F – Media Relations

Appendix G –Talking Points

Appendix H – Air Vapor Monitoring Community Public Affairs Action Checklist



## **Appendix A**

### **Address Lists for Contacts and Interested Parties**

<b>Federal Elected Officials</b>		
<b>Senator Lamar Alexander (R-TN)</b> 167 N Main St Ste 1068 Memphis, TN 38103 Phone: (901) 544-4224	<b>Senator Bob Corker (R-TN)</b> 100 Peabody Place, Suite 1125 Memphis, TN 38103 Main: 901-683-1910 Fax: 901-575-3528	<b>Congressman Steve Cohen (D-9<sup>th</sup> Dist)</b> The Clifford Davis / Odell Horton Federal Building 167 North Main Street, Suite 369 Memphis, TN 38103 Phone: (901) 544-4131 Fax: (901) 544-4329
<b>Local Officials</b>		
<b>Mayor Willie W. Herenton</b> City Hall 125 N. Main St. Room 700 Memphis, TN 38103 Phone: (901) 576-6007 Fax: <a href="mailto:mayor@memphistn.gov">mayor@memphistn.gov</a>	<b>Mr. Sydney Chism</b> Shelby County Board of Commissioners 160 N. Main, Suite 450 Memphis, TN 38103 <a href="mailto:sidney.chism@shelbycountyttn.gov">sidney.chism@shelbycountyttn.gov</a>	<b>Ms. Wanda Halbert</b> Memphis City Council 125 N. Main, Room Memphis, TN 38103 Work: (901) 576-6786 Fax (901) 576-6796 <a href="mailto:Wanda.halbert@memphistn.gov">Wanda.halbert@memphistn.gov</a>
<b>Mr. Jim Covington</b> Memphis Depot Redevelopment Corporation 2245 Truitt Street Memphis, TN 38114 Work: (901) 942-4939 Fax: (901) 942-5131 Email: <a href="mailto:jcovington@memphisdepot.net">jcovington@memphisdepot.net</a>		
<b>Former Memphis Depot environmental cleanup program:</b>		
Defense Distribution Center (DDC) Attn: Michael Dobbs, DES-DDC-EE S Avenue Bldg. 1-2 New Cumberland, PA 17070-5000 (717) 770-6950 <a href="mailto:michael.dobbs@dla.mil">michael.dobbs@dla.mil</a>	Defense Distribution Center (DDC) Attn: Stacy Umstead, DDC-CX J Avenue Bldg. 81 New Cumberland, PA 17070-5000 (717) 770-2880 <a href="mailto:stacy.umstead@dla.mil">stacy.umstead@dla.mil</a>	Turpin Ballard Remedial Project Manager U.S. Environmental Protection Agency Federal Facilities Branch 61 Forsyth Street SW Atlanta, GA 30303 (404) 562-8553 <a href="mailto:ballard.turpin@epa.gov">ballard.turpin@epa.gov</a>
Jamie Woods Remedial Project Manager Tennessee Department of Environment and Conservation (TDEC) 2510 Mt. Moriah Rd., Suite E645 Memphis, TN 38115-1520 (901) 368-7910 <a href="mailto:jamie.woods@state.tn.us">jamie.woods@state.tn.us</a>		

Former Memphis Depot Restoration Advisory Board Community Members		
Mr. Mondell Williams Restoration Advisory Board Community Co-Chair 667 Mallory Avenue Memphis, TN 38106 Home: (901) 946-9751 <a href="mailto:mondellw@yahoo.com">mondellw@yahoo.com</a>	Atty. Reginald Eskridge 100 North Main Street, Suite 1036 Memphis, TN 38103-5010 Work: 901-522-9600	Mr. Stanley Tyler 1858 Boyle Avenue Memphis, TN 38114 Home: (901) 775-1722 Work: (901) 448-5661
Mr. Dave Bond 2410 Bridgeport Drive Memphis TN 38114 Home: 901-774-4903	Mr. Norm LaChapelle Memphis/ Shelby County Health Dept. 814 Jefferson Avenue Memphis, TN 38105 Work: (901) 544-7582 Fax: (901) 544-7475 <a href="mailto:nlachapelle@co.shelby.tn.us">nlachapelle@co.shelby.tn.us</a>	Mr. Ulysses Truitt 2559 Bridgeport Drive Memphis, TN 38114 Home: (901) 947-2754
Ms. Doris Bradshaw 1458 E. Mallory Memphis, TN 38106 Home: (901) 942-0329 Email: <a href="mailto:DDMTCCC411@aol.com">DDMTCCC411@aol.com</a>	Ms. Johnnie Mae Peters 3286 Norton Road Memphis, TN 38109 Home: (901) 785-7289	Mr. William T. Winford Memphis Light, Gas and Water Division PO Box 430 Memphis, TN 38101-0430 Work: (901) 320-3901 Fax: (901) 320-3995 Email: <a href="mailto:wwinford@mlgw.org">wwinford@mlgw.org</a>
Ms. Peggy Brooks 1924 Hays Road Memphis, TN 38114 Home: (901) 743-5136 or 634-0124 Work: (901) 416-3006 Email: <a href="mailto:brooksp01@k12n.net">brooksp01@k12n.net</a>	Ms. Elizabeth Young 2347 Saratoga Avenue Memphis, TN 38114-1703 Home: 901-458-1703	

**Appendix B:**  
**Off-Depot Soil Vapor Monitoring Survey Areas**  
**and List of Owners**



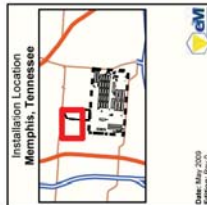
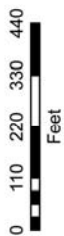
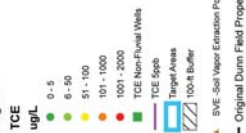
**TCE  
CONCENTRATIONS,  
APRIL 2009**

APRIL 2008 SEMIANNUAL  
MONITORING REPORT

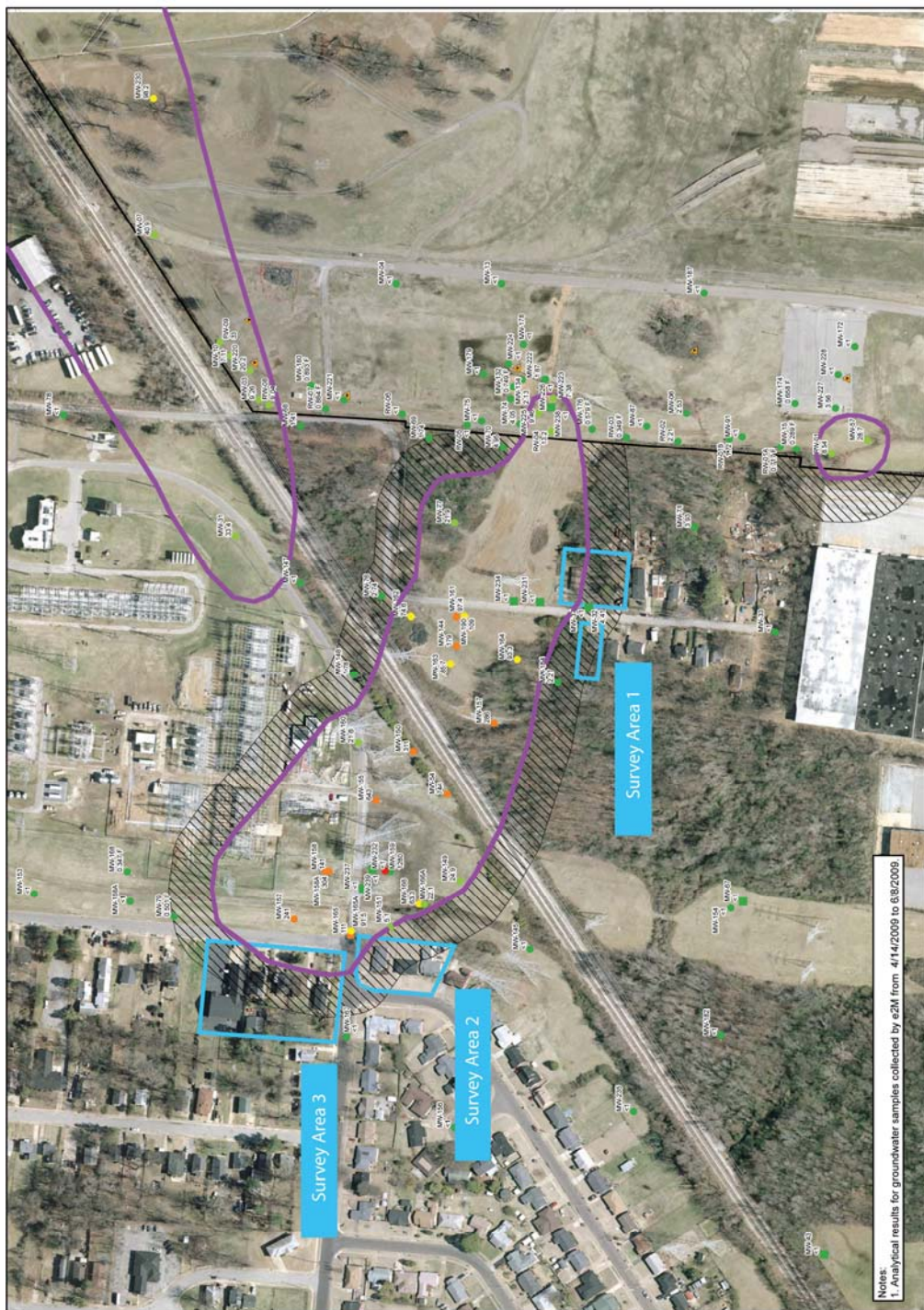
DUNN FIELD  
GROUNDWATER IRA  
YEAR ELEVEN

DEFENSE DEPOT  
MEMPHIS, TENNESSEE

**Legend**




Date: May 2009  
Edition: Rev 0



Notes:  
1. Analytical results for groundwater samples collected by e2M from 4/14/2009 to 6/6/2009.

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<b>Properties Identified in Soil Vapor Monitoring Survey Areas</b> (Sources: <a href="http://www.assessor.shelby.tn.us/content.aspx">http://www.assessor.shelby.tn.us/content.aspx</a> And <a href="http://register.shelby.tn.us/index.php">http://register.shelby.tn.us/index.php</a> )			
	<b>East Side (3 properties) West Side (1 property)            of Rozelle St. South of Menager Rd            (Cassaretto M Subdivision)</b>	<b>Property Address</b>	<b>Survey Area</b>
1	HENDERSON EVER AND BESSIE L MERRIWEATHER 1796 ROZELLE ST MEMPHIS, TN 38106-7026 PH: No Listing Available Basement Type: CRAWL=0-24%	1796 ROZELLE ST Parcel ID: 060086-00039	1
2	SHELBY COUNTY TAX SALE 0403 EXH #9733 County Land Bank Office PO BOX 2751 MEMPHIS, TN38101 PH: No Listing Available Basement Type: None (VACANT LAND)	0 ROZELLE ST Parcel ID: 060086 00038	1
3	MOORE BERNARD 895 ENFIELD RD MEMPHIS, TN 38116-7089 PH: No Listing Available Basement Type: PART=25-75%	1803 ROZELLE ST (east side) Parcel ID: 060086 00020	1
4	SHELBY COUNTY TAX SALE 0102 EXH #14457 County Land Ban County Land Bank Office k Office PO BOX 2751 MEMPHIS, TN 38101 PH: 901-545-4900 (Mike Blackwell) Basement Type: None (VACANT LAND)	1808 ROZELLE ST (vacant land) Parcel ID: 060086 00037	1
	<b>SE Corner of Meadowhill St. and Menager Rd            (Gaslight Square Subdivision)</b>	<b>Property Address</b>	<b>Survey Area</b>
1	DOTSON C D & ESTELLA M 1595 MENAGER RD MEMPHIS, TN 38106-7049 PH: (901) 774-2721 Basement Type: None	1595 MENAGER Parcel ID: 060079 00078	2
2	NEWMAN ROBERT P 1758 MEADOWHILL MEMPHIS, TN 38106 7010 PH: (901) 774-9072 Basement Type: None	1758 MEADOWHILL Parcel ID: 060079 00077	2
3	LOWE W F & VERDA M 1764 MEADOWHILL ST 	1764 MEADOWHILL Parcel ID: 060079 00076	2



	MEMPHIS, TN 38106-7010 PH: No Listing Available Basement Type: None		
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	<b>NW Corner of Ragan St. and Menager Rd (Owner and Owner Address) (Dilatush and Crane Subdivision)</b>	<b>Property Address</b>	<b>Survey Area</b>
1	OAK HILL BAPTIST MB CHURCH (POC: REV A. MAYES JR.) 1725 RAGAN ST SMITH & GODWIN MEMPHIS, TN 38106-7021 PH: (901) 948-7107 Basement Type: None	1725 RAGAN Parcel ID: 060080 00016	3
2	KENNON ISAAC AND VERZELLE 1729 RAGAN ST MEMPHIS, TN 38106-7021 PH: (901) 948-7107 Basement Type: None (Vacant Land)	1729 RAGAN Parcel ID: 060080 00017	3
3	OSBORNE LAVERNE 1733 RAGAN ST MEMPHIS, TN 38106-7021 PH: (901) 774-5972 Basement Type: CRAWL=0-24%	1733 RAGAN Parcel ID: 060080 00018	3
4	BOLDEN ANNET 1739 RAGAN ST MEMPHIS, TN 38106-7021 PH: (901) 947-4225 Basement Type: CRAWL=0-24%	1739 RAGAN Parcel ID: 060080 00019	3
5	JONES FRANK 4576 NEWTON DR MEMPHIS, TN 38109 PH: (901) 948-1995 Basement Type: CRAWL=0-24%	1743 RAGAN Parcel ID: 060080 00020	3

Note 1: Survey areas are identified on the aerial shot going from left to right on the image, from northeast to southwest.

Note 2: Area 1 combines sampling areas on both sides of Rozelle Road.

Note 3: All property and property owner addresses shown are current as of February 11, 2009, as recorded with the Shelby County Register of Deeds: <http://register.shelby.tn.us/index.php>.

## **Appendix C**

### **Letters to Property Owners and Occupants**





**DEFENSE LOGISTICS AGENCY**  
DEFENSE DISTRIBUTION CENTER  
2001 MISSION DRIVE  
NEW CUMBERLAND, PA 17070-5000

IN REPLY  
REFER TO

DDC-DES-EE

July 23, 2009

XXXXXX  
XXXX XXX Rd  
Memphis TN XXXXX

Dear XXXXXX:

As you may know, the Defense Logistics Agency (DLA) is completing environmental cleanup on and in the area of the former Memphis Depot. The final phase of activities will begin later this summer with construction of an Air Sparging and Soil Vapor Extraction groundwater treatment system south of the Memphis Light Gas and Water substation on Menager Road.

As part of these activities, we request permission to survey your property at \_\_\_\_\_ by completing and returning the enclosed Right-of-Entry form in the stamped envelope provided. We are surveying property located along the edge of the impacted groundwater that will be treated by the Air Sparging and Soil Vapor Extraction system scheduled to begin on or about November 1, 2009. Please review the enclosed fact sheet for more information on the survey process and this environmental cleanup technology.

If you own but do not reside at the property in question, we ask that you inform the current occupant about the upcoming survey and let them know we have your permission, provided you grant our request to do so. We are sending a similar letter to occupants of properties asking that they contact the property owner regarding this matter.

The survey areas include:

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

The initial activity is a property survey, which includes a visual inspection of buildings on the property to see if they are built on slabs or have basements. The survey may indicate a need to collect soil samples in the surrounding yards down to depths of about 18 feet and to insert devices

designed to collect soil vapor data. After 24 to 48 hours, the devices will be retrieved and the data collected.

This effort intends to assess soil vapor quality in and near residential structures near the groundwater cleanup area extending west from Dunn Field. Soil vapor quality will be measured to evaluate potential impacts on residential air quality before and just after operations of the Air Sparging and Soil Vapor Extraction system begin.

These sampling activities are proactive measures being taken by the DLA with concurrence from the U.S. Environmental Protection Agency (U.S. EPA) and the Tennessee Department of Environment and Conservation (TDEC). Similar soil vapor monitoring activities are being conducted at other groundwater cleanup sites in Tennessee.

Sampling activities are described in more detail in the Off-Depot Groundwater Remedial Action Work Plan that is available in the former Memphis Depot's information repository (IR) located in the Community Outreach Room, 2245 Truitt Street, within the Memphis Depot Business Park.

EPA, TDEC and DLA will review the soil vapor sampling results. Depending on the results, further action may be necessary. Results for individual properties will be provided to property owners and residents within 90 days of collecting the sample.

The attached Right-Of-Entry form is provided for your review and signature. If you approve, please sign and return in the enclosed prepaid envelope; or if you prefer, fax the document to 901-774-3667. If however, there are other reasons you know of for not including your property in this survey, we ask that you please check the appropriate box on the form and return it. Please be assured that no survey work will occur on your property without your permission.

Should you have any additional questions, please call the Community Information Line at (901) 774-3683 for more information.

Sincerely,

MICHAEL A. DOBBS  
Chief  
Environment, Safety and  
Occupational Health

Enclosures  
As

cc:  
Restoration Advisory Board



## DEFENSE LOGISTICS AGENCY

DEFENSE DISTRIBUTION CENTER  
2001 MISSION DRIVE  
NEW CUMBERLAND, PA 17070-5000

IN REPLY  
REFER TO

DDC-DES-EE

July 23, 2009

XXXXXX  
XXXX XXX Rd  
Memphis TN XXXXX

Dear XXXXXX:

As you may know, the Defense Logistics Agency (DLA) is completing environmental cleanup on and in the area of the former Memphis Depot. The final phase of activities will begin later this summer with construction of an Air Sparging and Soil Vapor Extraction groundwater treatment system south of the Memphis Light Gas and Water substation on Menager Road.

We want to make you aware that, as part of this process, contractors for the former Memphis Depot are contacting the property owners for this address. We are seeking permission to survey the property because it is situated along the edge of an underground plume of groundwater that will be treated by the Air Sparging and Soil Vapor Extraction system scheduled to begin on or about November 2009. Please review the enclosed fact sheet for more information on the survey process and this environmental cleanup technology.

The survey areas include:

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

The property survey includes a visual inspection of buildings on the property to see if they are built on slabs or have basements. The survey may indicate a need to collect soil samples down to depths of about 18 feet and to insert devices designed to collect soil vapor data. After 24 to 48 hours, they will be retrieved and the data collected.

This effort intends to assess soil vapor quality in and near residential structures located near the groundwater cleanup area extending west from Dunn Field. Soil vapor quality will be measured to evaluate potential impacts on residential air quality before and just after operations of the Air Sparging and Soil Vapor Extraction system begin.

These sampling activities are proactive measures being taken by DLA with concurrence from the U.S. Environmental Protection Agency (U.S. EPA) and the Tennessee Department of Environment and Conservation (TDEC). Similar soil vapor monitoring activities are being conducted at other groundwater cleanup sites in Tennessee.

Sampling activities are described in more detail in the Off-Depot Groundwater Remedial Action Work Plan that is available in the former Memphis Depot's information repository (IR) located in the Community Outreach Room, 2245 Truitt Street, within the Memphis Depot Business Park.

EPA, TDEC and DLA will review the soil vapor sampling results. Depending on the results, further action may be necessary. Results for individual properties will be provided to property owners and residents within 90 days of collecting the sample.

Should you have any additional questions, please call the Community Information Line at (901) 774-3683 for more information.

Sincerely,

MICHAEL A. DOBBS  
Chief  
Environment, Safety and  
Occupational Health

Enclosures

As

cc:

Restoration Advisory Board

## **Appendix D**

### **Fact Sheets**

#### **Off-Depot Soil Vapor Monitoring Air Sparging and Soil Vapor Extraction**



## **Neighborhood Notice Off-Depot Soil Vapor Monitoring Fact Sheet**

**(July, 2009)** As part of the former Memphis Depot's commitment to clean up the environment, the final phase of the cleanup project began in Summer 2009 with construction of a treatment system for shallow groundwater that has moved west of Dunn Field as outlined in the Dunn Field Record of Decision Amendment.

Environmental contractors for the former Memphis Depot are preparing to construct an Air Sparging and Soil Vapor Extraction system to remove contaminants from shallow groundwater south of the Memphis Light, Gas and Water substation on Menager Road. These activities are all part of proactive measures being conducted by the Defense Logistics Agency (DLA) with concurrence from U.S. Environmental Protection Agency (EPA) and Tennessee Department of Environment and Conservation (TDEC). Similar soil vapor monitoring activities are being conducted at other groundwater cleanup sites in Tennessee.

Prior to construction, environmental contractors will survey residential properties west of Dunn Field. After completing the survey, the contractors may collect soil samples from the yards of some residences in an effort to assess soil vapor quality in the groundwater cleanup area extending from Dunn Field. That groundwater has been found to contain chlorinated volatile organic compounds exceeding maximum contaminant levels. Soil vapor quality will be measured to evaluate potential impacts on residential air quality before and just after operations of the Air Sparging and Soil Vapor Extraction system begin.

The property survey includes a visual inspection of buildings on the property to see if they are built on slabs or have basements. Depending on the results of the survey, property owners may be asked for permission to collect soil samples in their yards down to depths of about 18 feet and to install sampling probes to collect soil vapor data before and just after operations of the Air Sparging and Soil Vapor Extraction system begins. Soil vapor quality will be measured to evaluate potential impacts on residential air quality.

### **The survey areas include:**

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

## PROBING TO PREVENT PROBLEMS



*Pictured above is one type of probe (with connectors) workers from the former Memphis Depot will use to collect soil vapor measurements in neighborhoods west of Dunn Field. No longer than a child's finger, the probe helps collect sampling data that will determine if contaminants in groundwater have impact on residential air quality.*

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

Where private property is concerned, property owners will be contacted to obtain the necessary permission before any work is performed.

### Survey Procedure

1. With the owner's permission, environmental contractors will access the property and identify themselves by showing their Government Contractor ID badge and the purpose of their visit.
2. The contractor will simply determine if the home is built on a concrete slab or has a basement.
  - a. Only structures built on a slab or basement are subject to further testing (crawl spaces are excluded from the sampling procedure).

### Sampling Procedure

1. If the structure is built on a slab or basement, then environmental contractors will take soil samples from the yard and install up to three (3) soil vapor probes. Property owners and residents will be notified in writing when the soil sampling will take place.
2. Before collecting the samples and installing the probes, the gas, water, and electric service crews will mark any underground lines in the yard.
3. Environmental contractors will drill a small hole down to a depth of about 18 feet deep in the yard to obtain the required soil sample and to install the soil vapor probe. The hole will be filled with concrete and a valve box installed to protect the soil vapor probe.
4. Environmental contractors will collect soil vapor data before starting the Air Sparging and SVE system and then again about three months after the system begins operating. Residents will be notified before contractors collect the data.

EPA, TDEC and DLA will review the soil vapor sampling results. Depending on the results, further action may be necessary. Results for individual properties will be provided to property owners and residents within 90 days of collecting the sample.

Sampling activities are described in more detail in the Off-Depot Groundwater Remedial Action Work Plan that is available in the former Memphis Depot's information repository (IR) located in the Community Outreach Room, 2245 Truitt Street, within the Memphis Depot Business Park. The IR is available to the public from 9 a.m. to 5 p.m., Monday through Friday.

These efforts are all a part of the former Memphis Depot's commitment to restore, reuse, and revitalize this facility. We encourage you to call us with input or suggestions.

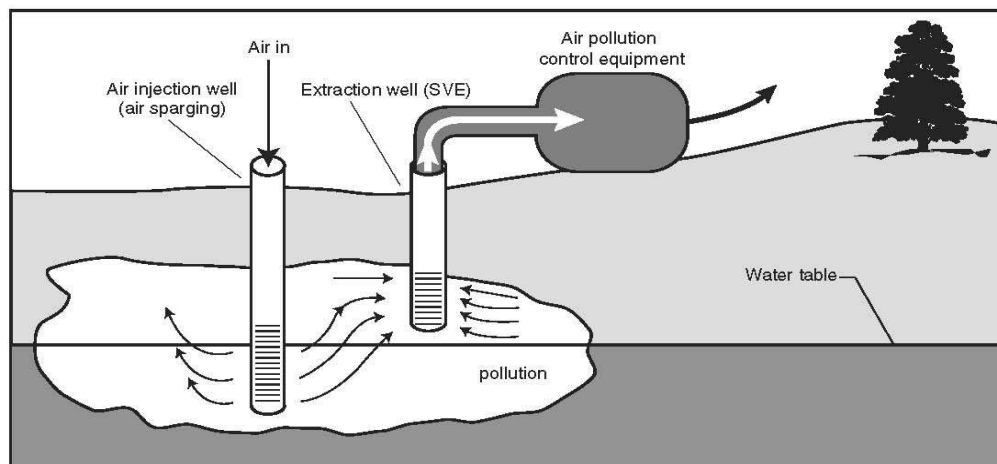
If you have further questions or to ensure someone is available to assist you at the IR, please call the Community Information Line at (901) 774-3683.



## Air Sparging and Soil Vapor Extraction Fact Sheet

**(July, 2009)** As part of the former Memphis Depot's commitment to clean up the environment, the final phase of the cleanup project began in June 2009 with preparations to construct the treatment system for shallow groundwater that has moved west of Dunn Field as outlined in the Dunn Field Record of Decision Amendment.

Environmental contractors for the former Memphis Depot are preparing to construct an Air Sparging and Soil Vapor Extraction (SVE) system to remove contaminants from shallow groundwater just south of the Memphis Light, Gas and Water (MLGW) substation on Menager Road. These activities are all part of proactive measures conducted by the Defense Logistics Agency (DLA) with concurrence from U.S. Environmental Protection Agency (EPA) and Tennessee Department of Environment and Conservation (TDEC). Similar soil vapor monitoring activities are being conducted at other groundwater cleanup sites in Tennessee.



*The air sparging or AS portion of the AS-SVE process involves the injection of air or oxygen through a contaminated aquifer. Injected air removes volatile and semi-volatile organic contaminants by volatilization. The injected air helps to flush the contaminants into the unsaturated zone.*

### How It Works

Air sparging or AS uses air to help remove contaminants from groundwater. When air is pumped into groundwater under the ground, the contaminants turn to vapor and move into the soil just above the water table making them easier to remove with the SVE system.



These efforts are all a part of the former Memphis Depot's commitment to restore, reuse, and revitalize this facility. We encourage you to call us with input or suggestions.

If you have further questions, please call the Community Information Line at (901) 774-3683.

Soil Vapor Extraction or *SVE* removes air and vapor from the soil above the water table by applying a vacuum to pull them out. The air and vapor are pulled through pipes to a control building that monitors the levels of contaminants being removed and to make sure the air released back into the environment meets the air permit requirements.

Certain chemicals – like solvents – evaporate easily. Air Sparging-SVE works best on these types of chemicals. Air Sparging and SVE is often used at the same time to clean up both soil and groundwater.

#### **How Safe Is It?**

When properly designed and operated, Air Sparging-SVE is a safe cleanup method. No one has to dig up the pollution, and no chemicals – just air – are added to the ground. The EPA, TDEC and DLA work together to make sure the system operates properly and that air released back to the environment meets the air permit requirements.

Air Sparging-SVE is quicker than cleanup methods that rely on natural processes to do the work. In general, the wells and equipment are simple to install and maintain. And they can reach greater depths than methods that involve digging up soil. Air Sparging-SVE is effective at removing many types of pollution that can evaporate. Both methods can be used with other methods to clean up other types of pollution as well. Both methods work best in loose soils—like sand and gravel.

Air Sparging-SVE is often chosen to clean up Superfund sites. EPA has selected SVE for use at approximately 196 sites and air sparging for use at roughly 48 sites.

#### **How Long Will It Take?**

The environmental contractors anticipate the Air Sparging-SVE system will meet the cleanup goals in five (5) years or less. Groundwater samples will be collected on a regular basis during operation of the Air Sparging-SVE system to make sure it is reducing contaminant levels in the groundwater. EPA and TDEC will review the results in order to confirm that the system has met the remedial goals.

## **Appendix E**

### **Right-of-Entry Form**

U.S. DEFENSE LOGISTICS AGENCY  
Right-of-Entry  
FORMER MEMPHIS DEFENSE DEPOT

The undersigned, hereinafter called the "Owner", hereby grants to the DEFENSE LOGISTICS AGENCY, and its authorized representatives, hereinafter called the "Government", a permit or right-of-entry and access to his/her property in connection with the required cleanup of contaminated groundwater originating from Former Memphis Depot Dunn Field pursuant to the Federal Facility Agreement for the Defense Depot Memphis Tennessee between the U.S. Environmental Protection Agency, the Tennessee Department of Conservation and the Defense Logistics Agency. Specifically, access has been requested because the property is situated along the edge of impact groundwater that will be treated by the Air Sparging and Soil Vapor Extraction system scheduled to begin on or about November 1, 2009.

1. The Owner consents to the Government entering and having continued access to his/her property for the purpose of allowing the Government to install and monitor for a term of one (1) year, soil vapor monitoring probes to be located on the residential lot described as Shelby County Tax parcel \_\_\_\_\_.

a. The attached drawing from Off-Depot Groundwater Remedial Design document shows the approximate location(s) of equipment in relation to the Owner's dwelling or other structures on site.

2. The Owner acknowledges that all tools, equipment, and other items taken upon or placed upon the land by the Government shall remain the property of the Government and may be removed by the Government at any time within a reasonable period after the expiration of this permit or right-of-entry. Unless otherwise pre-arranged between the Owner and Government representatives, it is understood that access to the property will be limited to the hours from 7 a.m. and 7 p.m.

3. If any action of the Government's employees or agents in the exercise of this right-of-entry results in damage to the real property, the Government will, at its option, either repair such damage or make an appropriate settlement with the Owner. In no event shall such repair or settlement exceed the fair market value of the fee interest of the real property at the time immediately preceding such damage. The Government's liability under this clause may not exceed appropriations available for such payment and nothing contained in this agreement may be considered as implying that Congress will at a later date appropriate funds sufficient to meet deficiencies. The provisions of this clause are without prejudice to any rights the Owner may have to make a claim under applicable laws for any other damages than provided therein.

4. The undersigned realizes that the actions stated above by the Government are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA) 42 U.S.C. 6901 et seq. This written permission is given by the Owner voluntarily without threats or promises of any kind.

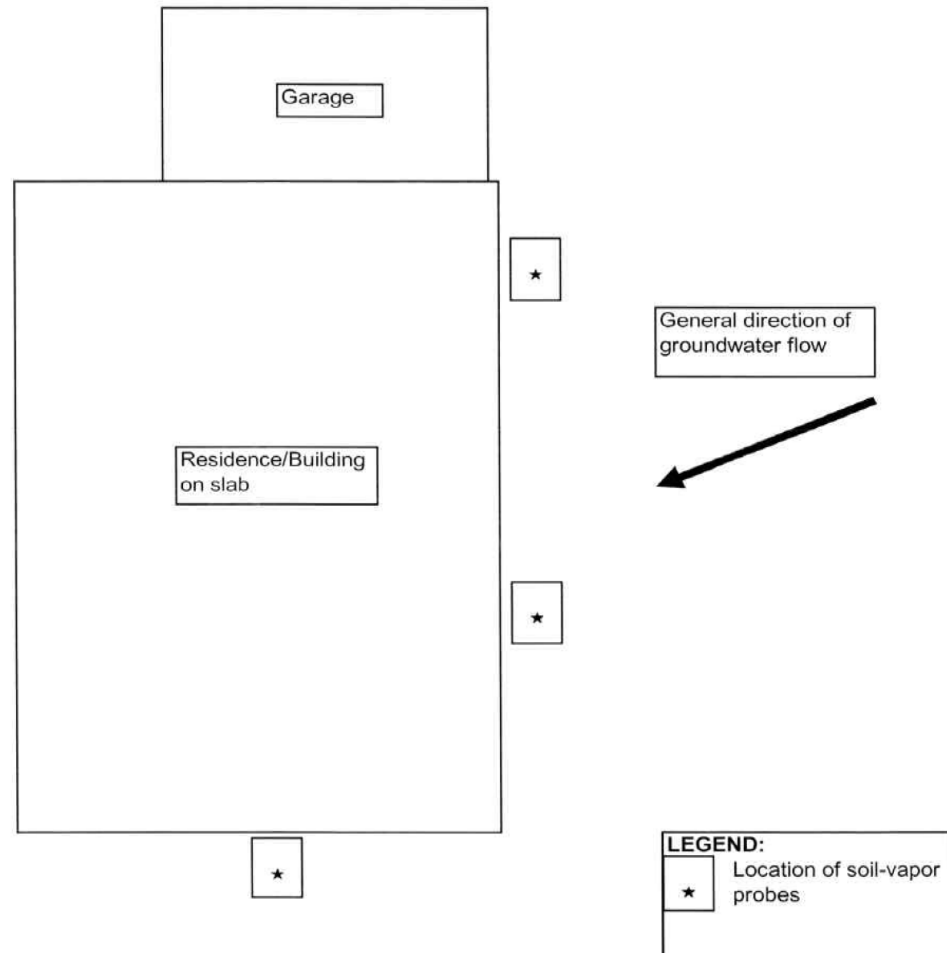
5. By placing an "X" in one of the boxes the undersigned attests that the property is not a candidate for this survey due to one of the following:

- ☐ The primary structure on this property is built over a crawlspace. No survey is necessary.
- ☐ The property is not developed. No structures exist there.
- ☐ I do not wish to participate in the survey.

Signed this \_\_\_\_ day of \_\_\_\_\_, 2009.

\_\_\_\_\_  
*Property Owner*

**FIGURE F-3**  
Generalized locations of Soil Gas Samples  
*Dunn Field Offsite Plume RD*



## **Appendix F**

### **Media Relations Press Advisory Media Contact List**

**For Immediate Release: July XX, 2009**

**Media Contact:**

**Stacy Umstead**

**Defense Distribution Center**

**(717) 770-2880**

**[stacy.umstead@dla.mil](mailto:stacy.umstead@dla.mil)**

### **Former Memphis Depot to Begin Final Environmental Cleanup Actions**

**MEMPHIS, Tenn.** - As part of the former Memphis Depot's commitment to clean up the environment, the final phase of the cleanup project began in June 2009 with preparations to construct the treatment system for shallow groundwater that has moved west of Dunn Field as outlined in the Dunn Field Record of Decision Amendment.

Environmental contractors for the former Memphis Depot are preparing to construct an Air Sparging and Soil Vapor Extraction (SVE) system to remove contaminants from shallow groundwater under the Memphis Light, Gas and Water substation on Menager Road. All work will be accomplished in accordance with Department of Defense, U.S. Environmental Protection Agency and Tennessee Department of Environment and Conservation requirements.

Prior to construction, environmental contractors will be contacting selected property owners to conduct surveys of residential properties west of Dunn Field. After completing the survey, the contractors may collect soil and soil vapor samples from the yards of some residences located at the edge of the groundwater plume.

Survey areas include:

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

The property survey includes a visual inspection of buildings on the property to see if they are built on slabs or have basements. Depending on the results of the survey, property owners may be asked for permission to collect soil samples down to depths of about 18 feet and to install sampling probes to collect soil vapor data to determine if there are any impacts to residential air quality from contaminants in the groundwater.

Soil vapor data will be collected before and just after operations of Air Sparging and SVE system begin. These sampling activities are proactive measures being taken by the Defense Logistics Agency with concurrence from the U.S. Environmental Protection Agency and the Tennessee Department of

Environment and Conservation. Similar soil vapor monitoring activities are being conducted at other groundwater cleanup sites in Tennessee.

These environmental cleanup efforts are all a part of the former Memphis Depot's commitment to restore, reuse and revitalize this facility. If you have further questions, please call Stacy Umstead at (717) 770-2880.

-30-

NOTE: Fact Sheets further explaining the survey protocols and air sparging/soil vapor methods are attached for your information.

# MEDIA OUTLETS LIST

Memphis Depot Media List  
Current 4/15/2009

Outlet Name	Circulation	Outlet	Address 1	Address 2	Zip	Phone	Email	Fax
<b>PRINT</b>								
Commercial Appeal, The	184,418	Newspaper	495 Union Ave.	Memphis, TN 38103	38103	(901) 529-2345	sines@commercialappeal.com	(901) 529-2787
North Shelby Times	63,000	Newspaper	3518 North Watkins	Memphis, TN 38127-5562	38127-5562	(901) 358-8034	info@northshelbytimes.com	(901) 358-8039
Memphis Flyer	55,365	Newspaper	460 Tennessee Street	Memphis, TN 38103	38103	(901) 521-9000	letters@memphisflyer.com	(901) 521-0129
Mid-South Tribune	30,000	Newspaper	1099 Forrest Ave	Memphis, TN 38105	38101	(901) 728-5001	mstnews@prodigy.net	(901) 728-5006
Silver Star News	28,000	Newspaper	3019 Park Avenue	Memphis, TN 38114	38114	(901) 452-8828	silverst@bellsouth.net	(901) 452-1656
Memphis Daily News, The	50,000	Newspaper	193 Jefferson Avenue	Memphis, TN 38103	38103	(901) 523-1561	releases@memphisdailynews.com	(901) 526-5813
Tri-State Defender	16,000	Newspaper	203 Beale Street Suite 200	Memphis, TN 38103	38103	(901) 523-1818	editorial@tri-statedefender.com	(901) 523-1820
Memphis Business Journal	7,138	Magazine, news and business	80 Monroe Avenue Suite 600	Memphis, TN 38103-2440	38103-2440	(901) 523-1000	memphis@bizjournals.com	(901) 526-5240
<b>TV</b>								
WLMT-TV	653,840	Television station	2701 Union Avenue Extension	Memphis, TN 38112	38112	(901) 323-2430	newsdesk@myeyewitnesnews.com	(901) 452-1820
WREG-TV		Television station	803 Channel 3 Dr	Memphis, TN	38101	(901) 543 2333	news@wreg.com	(901) 543-2167
WHBQ-TV		Television station	485 S Highland S	Memphis, TN	38111	(901) 320-1313	news@myfoxmemphis.com	901-320-1252
WMC-TV		Television station	1960 Union Avenue	Memphis, TN	38104	(901) 726-0416	desk@wmcvtv.com	(901) 278-7633
WPTY-TV	653,840	Television station	2701 Union Avenue Extension	Memphis, TN 38112-4400	38112-4400	(901) 323-2430	newsdesk@myeyewitnesnews.com	(901) 452-1820

1Depot List



Memphis Depot Media List  
Current 4/15/2009

RADIO									
WBBP-AM	653, 840	Radio station	547 Mississippi Boulevard	Memphis, TN 38126	38126	(901) 521-9160	wbbpradio@bbless.org	(901) 322-1707	
WEGR-FM	653, 840	Radio station	2650 Thousand Oaks Boulevard Suite 4100	Memphis, TN 38118	38118	(901) 259-1300	rock103@rock103.com	(901) 259-6449	
WGSF-AM	653, 840	Radio station	3695 Park Avenue	Memphis, TN 38111	38111	(901) 375-9324	wgsfnews@bellsouth.net	901-375-4117	
WHBQ-FM	653, 840	Radio station	6080 Mount Moriah Road Ext 2645	Memphis, TN 38115-2645	38115-2645	(901) 375-9324	<a href="mailto:chris.taylor@flinn.com">chris.taylor@flinn.com</a>	901-375-0041	
WMC-FM	653, 840	Radio station	1835 Moriah Woods Blvd, Bldg 1	Memphis, TN 38117	38117	(901) 726-0555	info@fm100memphis.com	(901) 272-9186	
WMFS-FM	653, 840	Radio station	1835 Moriah Woods Blvd, Bldg 1	Memphis, TN 38117	38117	(901) 535-093X	JRRoberts@entercom.com	(901) 726-5101	
WREC-AM	653, 840	Radio station	2650 Thousand Oaks Boulevard	Memphis, TN 38118	38118	(901) 259-1300	news@600wrec.com	(901) 259-6449	
WRVR-FM	653, 840	Radio station	1835 Moriah Woods Blvd, Bldg 1	Memphis, TN 38117	38117	(901) 767-0104	river104@wvr.com	(901) 767-0582	
WHRK-FM	90,000	Radio station	2650 Thousand Oaks Boulevard	Memphis, TN 38118	38118	(901) 259-1300	<a href="mailto:devinsteele@clearchann.com">devinsteele@clearchann.com</a>	(901) 259-6449	
KJMS-FM	60,000	Radio station	2650 Thousand Oaks Boulevard	Memphis, TN 38118-2451	38118-2451	(901) 259-1300	eileencollier@clearchann.com	(901) 259-6449	
KWAM-AM	60,000	Radio station	5495 Murray Road	Memphis, TN 38119	38119	(901) 261-4200	info@kwam990.com	(901) 261-4210	
WDIA-AM	60,000	Radio station	2650 Thousand Oaks Boulevard	Memphis, TN 38118	38118	(901) 259-1300	bobbyjay@clearchann.com	(901) 259-6449	
WUMR-FM	50,000	Radio station	The University of Memphis	Memphis, TN 38152	38152	(901) 678-2560	wumr@email.com	(901) 678-4899	
WEVL-FM	26,000	Radio station	143 Theatre & P.O. Box 40952	Memphis, TN 38174	38174	(901) 528-0560	wevl@wevl.org		

## **Appendix G**

### **Talking Points**

## Talking Points

### What is the purpose of the survey and associated air vapor sampling activities?

The intent is to assess soil vapor quality near residential structures in the vicinity of a potentially affected area.

- A plume containing chlorinated volatile organic compounds (CVOC) levels that exceed the maximum contaminant levels for drinking water extends west from the former Memphis Depot site
- Soil vapor quality will be assessed both before and during AS/SVE operations to evaluate the potential impact on residential air quality
- Depending on the survey results, either no further sampling may be required, or a risk analysis and testing of residential air will be considered

### What is the purpose of the Off-Depot Groundwater Remedial Action?

Objectives of the Off-Depot Groundwater Remedial Action is to safely remove contaminants from groundwater 30 to 70 feet below ground surface that have moved west of Dunn Field.

### What do the Remedial Design plans for groundwater in west of Dunn Field include?

The Record of Decision for Dunn Field was amended in 2009 to include the following key remedies for the Off-Depot plume:

- Use of Air Sparging (AS) with Soil Vapor Extraction (SVE) to intercept the majority of the chlorinated volatile organic compound (CVOCs) groundwater plume
- Natural attenuation (NA), which is a methodology being used in conjunction with AS/SVE for active on- and off-site groundwater remedies, and long-term groundwater monitoring to document remedy performance
- Institutional Controls (ICs) for additional protection against human exposure to contaminated groundwater. Examples of institutional controls might include:
  - Deed or zoning restrictions leading to the prevention of residential development land use on the Disposal Area of Dunn Field
  - Maintenance of fencing around the disposal area during active remediation to protect the public

### Why is this process being used?

AS-SVE was the selected alternative in the Dunn Field Record of Decision Amendment to treat groundwater that has moved northwest of Dunn Field.

- Air sparging injects air into the groundwater causing the solvents to turn to vapor
- The air and vapor are pulled through pipes to a control building that monitors the levels of contaminants being removed and to make sure the air released back into the environment meets the air permit requirements.
- The proposed location for the AS-SVE system is along the south side of Menager Road at the Memphis Light Gas and Water Division substation

### What is the intent of soil vapor monitoring?

As part of the AS-SVE process, the intent of the air vapor monitoring is to assess soil vapor quality near residential structures that are near the Off-Depot groundwater plume containing chlorinated volatile organic compounds (CVOCs). Soil vapor quality will be assessed before and just after air sparging/soil vapor extraction (AS/SVE) operations begin to evaluate potential impact on residential air quality.

**Will the monitoring take place on private property?**

Possibly. Some monitoring activity might need to occur on private property near residential structures if the residents allow. Depot representatives will be making contact with property owners to obtain consent to conduct property surveys to determine if any sampling or monitoring work is necessary.

**What areas have been identified for surveying?**

The proposed survey areas include:

**Area 1 (Cassaretto M Subdivision)** – Three properties located on the northeast end of Rozelle Street south of Menager Road, as well as one property on the northwest end of that same street section.

**Area 2 (Gaslight Square Subdivision)** – Those properties located on the east side of Meadowhill Street starting on the corner of Meadowhill and Menager Road and extending south for the first three properties.

**Area 3 (Dilatush and Crane Subdivision)** – Those properties located on the west side of Ragan Street starting on the corner of Ragan and Menager Road and extending north to (and including) the Oak Hill Missionary Baptist Church.

Again, it is important to stress here that no survey work will occur on private properties without the owner's permission.

**Why are these specific areas being surveyed?**

The selected areas were chosen because of their location along the edge of the Off-Depot groundwater plume. Surveying in these areas will allow evaluators to determine if samples and monitoring will be necessary for the property.

**Can DDC employees or their contractors gain access to residents' property without permission?**

In order to gain access to a private property, DDC employees and their contractors will first obtain a Right-Of-Entry form from property owners to obtain their consent for entry and also to protect their rights and privacy. A RoE form lays out what activities are planned, how long the activities may occur, and what actions will be taken if damage to the property occurs, whether intentional or not.

**Exactly what will local residents see during this survey sampling?**

Initially, residents will see little more than contractors, with owner's permission, entering the properties to identify themselves and the purpose of their visit.

- The contractors will simply seek to determine if the home is built on a concrete slab or a basement. If the structure does not have a basement or slab, no further testing will be necessary (crawl spaces are excluded from the sampling procedure)

**What happens if the property survey points to the need for taking soil samples?**

If the structure is built on a slab or basement, our environmental professionals will ask for permission to take soil samples from the yard at a future date.

1. Gas, water, and electric service crews will mark any underground lines in the yard.
2. Environmental work crews will drill a small hole down to a depth of about 18 feet deep in the yard to obtain the required soil sample and in insert the soil vapor monitoring device. The hole will be stabilized with concrete which will take 48 hours to cure.

3. Soil vapor monitoring devices will be in place for 24 to 48 hours.
4. If soil samples show no vapors due to the groundwater cleanup effort, the survey is complete.

**What happens if the soil samples determine a need for indoor air vapor quality monitoring?**

If soil samples reveal traces of vapors that we are removing from the depot grounds we will ask permission to come inside the home to take a soil sample below the slab or basement floor.

- Holes will be no larger than one-inch in diameter
- Samples will be taken and tested
- The hole will be filled and resealed

If the samples show no vapors trapped in the soil, the survey is complete.

If vapors are present we will work with the property owner to eliminate any potential adverse affects to the property.

**Would dust and waste associated with digging or burrowing into the surface soil pose a risk to nearby residents?**

No. The main focus of this monitoring process is to analyze vapors occurring below ground surface.

- Waste generated during the sampling phase is expected to include disposable materials (e.g., paper towels and gloves), soil cuttings, and decontamination water
- Disposable materials will be placed in appropriate waste containers at the end of each work shift
- Any small amounts of soil removed during the sampling will not pose a hazard to residents near the sampling locations. These non-hazardous soil cuttings will be spread at the drill site
- Decontamination waste liquids and solids will be disposed in the sanitary sewer

**How will the soil vapor sampling and associated construction disrupt the neighborhood?**

The soil vapor sampling is part of the overall plan to begin Off-Depot remedial work on or about On or about September, 2009 and complete all activities by November, 2009. Construction on the latter will occur within the Memphis Light, Gas and Water (MLGW) substation property and heavy equipment should enter the site on the east side of the substation – not through the neighborhood.

The next steps include:

- Remedial Action Work Plan – spring 2009
- Remedial Action Implementation – summer/fall 2009
- System start-up – fall/winter 2009/2010
- Performance Monitoring and O&M – 2010 to remedy completion (about five years)

**How long will the process take?**

Systems are expected to operate five years to meet groundwater remedial goals. System monitoring will be performed regularly throughout the remedial action.

**HEALTH AND SAFETY**

**Is the drinking water safe?**

Yes, the drinking water is safe. The affected groundwater is in the shallow aquifer, which is not used for drinking. Memphis' drinking water comes from the Memphis Sand aquifer, which has not been affected by historic activities at the former Memphis Depot.

**Was there any legal order as to what to clean up during this project?**

The Record of Decision identified areas within the shallow aquifer that required cleanup and outlined cleanup objectives. We are presently in the final stages for meeting those objectives.

**Is anyone being exposed to the solvents in the groundwater?**

No. The solvents in the groundwater are in the shallow aquifer, which is not a source of drinking water for the city of Memphis. The Memphis-Shelby County Health Department restricts drinking water use from the shallow aquifer for all of Shelby County.

**Are there health hazards from the Depot to residents in the area?**

No. Several public health assessments for the Memphis Depot, the latest in 2000, indicated no impact to human health in the area.

**Has the city's drinking water ever been affected in any way by the Memphis Depot?**

The city's drinking water comes from a deep aquifer, which is about 300 feet down and our studies indicate it has not been affected. The groundwater being treated at the Depot is from the shallow aquifer, which is about 80 feet deep.

**GENERAL**

**What is the progress of the cleanup at the Memphis Depot site?**

The environmental cleanup program at the former Memphis Depot is now in the final stages of the six-stage process outlined in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). These stages are: Remedial Investigation, Feasibility Study, Proposed Plan, Record of Decision, Remedial Design and Remedial Action.

**What is the history of the Memphis Depot cleanup?**

- 2000 - Completed the Main Installation Remedial Investigation (RI), Feasibility Studies (FS) and Proposed Plan (PP) for Soil and Groundwater
- 2001 – Signed the Main Installation Record of Decision
- 2002 – Completed the Dunn Field RI
- 2003 – Completed the Dunn Field FS and PP
- 2004 – Signed the Dunn Field Record of Decision
- 2005 – Began Dunn Field Disposal Sites Remedial Action (RA)
- 2006 – Began Main Installation RA and completed Dunn Field Disposal Sites RA
- 2007 – Began Dunn Field Source Areas RA
- 2008 – Began Dunn Field Loess/Groundwater RA
- 2009 – Completed Dunn Field Loess/Groundwater RA; signed Dunn Field ROD Amendment and will begin Off-Depot Groundwater RA

The Records of Decision outline the cleanup solutions that will be implemented to address environmental conditions and ensure the sites are safe for future reuse.

**Has Dunn Field been completely sold?**

Dunn Field consists of 64 acres. A 41-acre portion of Dunn Field was purchased by Stuart Frankel Development Co., a Detroit-based developer, with plans to launch Dunn Field Business Park, a four-building distribution center. The remainder of Dunn Field is undergoing final remedial actions and is expected to be ready for transfer by 2010.

**How will the public continue to be informed about this project?**

The former Memphis Depot's environmental team will continue to inform the community through our regular outreach activities such as public briefings, community information sessions, media releases, fact sheets, and future issues of EnviroNews.

If you have further questions, please contact the Community Information Line at (901) 774-3683.

## **Appendix H**

### **Soil Vapor Monitoring Public Affairs Action Checklist**



<b>FMD- Memphis Dunn Field Air Vapor Monitoring Community Relations Action Checklist</b> <b>(NOTE: Dates may be adjusted changes in RAWP)</b>						
ID	Task Name	Duration	Predecessors/ PA Plan Ref	Date Action Started	Date Action Completed	Comments
1	Off Depot Groundwater Remedial Action	1592 Days		9/26/08		<b>Source:</b> Project Schedule Off Depot Groundwater Remedial Action Work Plan (RAWP), March 2009, Rev 1 Figure A-2
2	IMS Submission of Off-Depot Groundwater RA Community Relations Plan to DDC for Approval	0 Days		3/27/09	3/30/09	<b>Goal to have PA plan fully coordinated with DDC and ready for implementation by RAWP approval.</b>
3	DDC review of plan, return to contractor with comments	5 Days		4/3/09	4/15/09	
4	incorporation of DDC comments, HDR/e2M review of final, IMS submittal of final to DDC,	3 Days		6/2/09		
5	Approval of RAWP (no IMS action contemplated)	0 Days		6/29/09	3/18/09	<b>Source:</b> Project Schedule Off Depot Groundwater Remedial Action Work Plan (RAWP), March 2009, Rev 1 Figure A-2
6	Approval of ComRel Plan	0 Days		6/30/09		Approval sought to be concurrent with RAWP
7	Regulator Off-Dept Groundwater RA Construction Conference (no IMS action contemplated)	5 Days	3	TBD		Ensure Community PA Plan is adjusted to account for changes in soil vapor monitoring activities as a result of this meeting
8	DDC reviews, approves, signs and returns copies of documents required for mailing to contractor for dissemination.	1	Issue #3	7/23/09		
9	IMS Preparation of and mailing of Letters to Property Owners	1 Day	Issue #2, para. 1	7/24/09		
10	Preparation of and mailing of Letters to Property Residents	1Day	Issue #2, Para. 1	7/24/09		
11	IMS Preparation of and mailing of Letters to Interested Parties	1 Day	Issue #2, Para. 6	7/24/09		
12	Release of Media Advisory to selected media by DDC Public Affairs	1Day	Issue #2, Para. 3	7/27/09		IMS check with DDC PA to track number of media queries related to this activity.

13	IMS Check with DDC to track number and types of media queries	Over 45-Day Period	Issue #2, Para. 3a	Starting 7/27/09		IMS should check periodically and maintain a record for inclusion in the after-action report.
14	IMS Preparation of and delivery of "Door Hangers" to surrounding Residents	1Day	Issue #2, Para. 3	Deliver such that items are distributed NLT 7/31/09		HDR e2M staff will handle physical delivery of "door hanger" packets
15	IMS monitoring of Community Information Line	Over 45-Day Period	Issue #2.1	7/24/09		IMS include in normal CIL monitoring process. Begin with mail outs and progress through end of baseline sampling. Maintain separate record of queries related to this activity
16	IMS follow-up with Property Owners regarding Right-Of-Entry forms	2 days	Issue #2, Para. 2	8/3/09		
17	IMS post copies of the media advisory and fact sheets (at a minimum) to the DDC web site	1 Day	6, 7, 8/Issue #2, Para. 5	8/3/09		Due NLT 8/3/09
18	Baseline Soil Vapor Sampling	20 Days	3	8/24/09		Source: Project Schedule Off Depot Groundwater Remedial Action Work Plan (RAWP), March 2009, Rev 1, Figure A-2, ID#16
19	IMS place copies of all documents related to this action in the information repository	1 Day	Issue #5, Para. 3	8/1/09		Due NLT 8/1/09
19	IMS compile and submit through HDR e2M a report detailing effectiveness of the Community PA Plan, lessons learned, and recommendations for future similar actions	Over 30-Day Period	Issue # 4, Para. 3	8/28/09		Due NLT 8/28/09
20	OPTIONAL: Should Property owners show concerns over permitting access, consider arranging for a meeting with them at the Oak Hill Baptist Church.	Over 10-Day Period	Issue #2, Para. 2a	NLT 8/14/09		Goal should be to obtain enough permits in time to meet Baseline Intrusion Soil Vapor Sampling.