

2021 Annual Site Inspection

Defense Depot Memphis, Tennessee
U.S. EPA I.D. Number TN4210020570

Revision 1
February 2022



Defense Depot Memphis, Tennessee
Main Installation
2021 Annual Site Inspection Report

Pursuant to the Land Use Controls Implementation Plan (LUCIP) dated February 2004 (Appendix C of Rev. 1 Final Main Installation Remedial Design dated July 2004) for the former Defense Depot Memphis, Tennessee (DDMT) - Main Installation (MI), a visual inspection of the MI was conducted by HDR, Inc. on 15 July 2021. Photographs from the inspection are provided in [Appendix B](#). Interviews with the following personnel were conducted 14 to 30 July 2021; contact records are provided in [Appendix C](#):

- Ms. Anita Bunn of Colliers Management Services-Memphis LLC (Colliers) – the property management firm for Memphis Depot Industrial Park (MDIP), 14 and 19 July 2021
- Mr. Greg Ward, Yard Manager of Barnhart Crane (Barnhart), 14 July 2021
- Mr. Sean Pedigo, Yard Manager of Supply Chain Solutions LLC (SCS), 16 and 20 July 2021
- Mr. Randy Richardson, Executive Director of Port of Memphis and Vice President of Port and Industrial Property for the Memphis/Shelby County Economic Development Growth Engine (EDGE)/Depot Redevelopment Corporation (DRC), 16 July 2021
- Mr. Leonard Perkins, President of Vietnam Veterans Association Chapter 1113 (VVA) and Manager of the golf course, 19 July 2021
- Ms. Warkella Tyson, Supervisor of Shelby County Health Department Pollution Control Division, Water Quality Branch and Septic Tank Program, 15 July 2021

The MI contains approximately 567 acres with open storage areas, warehouses, former military family housing, and outdoor recreational areas. All the MI property has been transferred for reuse through public benefit and economic development conveyances.

[Table 1](#) Summary of Land Use Controls and Monitoring Requirements, [Figure 1](#) Land Use Restrictions Map and [Figure 2](#) Groundwater Use Restrictions from the MI LUCIP are attached. The majority of the MI is zoned for industrial use. The LUCIP states Functional Unit 6 (FU6) on the eastern boundary of the MI, which contains the former administrative area and the former housing area, is approved for unrestricted use ([Figure 1](#)). However, zoning restrictions limit residential use to the former housing area. The golf course (FU2) is limited to recreational use per the transfer deed from the Department of the Interior.

A summary of the land use restrictions is as follows:

- No residential land use or other child-occupied facilities including daycare on the MI (except Parcels 1 and 2 of FU6).
- No production/consumptive use of groundwater or drilling groundwater wells on the MI.
- Notice of Land Use Restrictions (NLUR) filed with Shelby County Register of Deeds (SCROD). Leases and deeds for MI property must include the Land Use Controls (LUC) and Environmental Protection Provisions (EPP).

Verification that land use restrictions are being accomplished and LUCs remain effective

- Verify that boundary fence surrounding golf course area in FU2 remains intact.
 - Visual inspection conducted on 15 July 2021. No deficiencies or required repairs to the boundary fence identified.
 - Interviewed Mr. Perkins, VVA, on 19 July 2021 ([Appendix C](#)). VVA obtained the lease for the golf course from the City of Memphis and took over operations in January 2020. Mr. Perkins confirmed that VVA was responsible for maintaining the fence around the golf course. VVA performs grounds maintenance regularly throughout the year and checks the fence for damage. No damage to the fence has been observed since last site inspection in July 2020. When fence damage is identified, VVA works quickly to have it fixed.
- Verify that no residential housing/development or child daycare activities are occurring at the site (except Parcels 1 and 2 of FU6).
 - Visual inspection conducted on 15 July 2021. No deficiencies identified.
 - Conducted an on-line search of the Shelby County Office of Planning and Development Land Use Controls Section website (<https://shelbycountyttn.gov/140/Land-Use-Control-Board>) and the zoning atlas (<https://gis.shelbycountyttn.gov/zoning>) on 26 and 28 July 2021. The search confirmed that the MI is zoned Industrial District – EMP for Employment ([Appendix D1](#)) as per the Memphis and Shelby County Unified Development Code – The Zoning Code and Development Regulations for the City of Memphis and Unincorporated Shelby County approved by the Shelby County Board of Commissioners as Ordinance No. 397 on 9 August 2010, and the Memphis City Council as Ordinance No. 5367 on 10 August 2010 and as amended on 18 October 2016. There are two exceptions: the former housing area is zoned Residential (RU-3) ([Appendix D2](#)), and the golf course area in FU2, which is shown as Recreational land use ([Appendix D3](#)).
 - Interviewed Ms. Bunn of Colliers, Mr. Ward of Barnhart, Mr. Pedigo of SCS, Mr. Perkins of VVA, and Mr. Richardson of EDGE/DRC ([Appendix C](#)).

In each interview it was noted that the land use restrictions apply to all the MI, except the area available for unrestricted use along the eastern boundary. The groundwater use restrictions, which are enforced by Shelby County Health Department (SCHD), apply to all the MI and the surrounding area within one-half mile. The restrictions apply to all the property held by the interviewees' companies, except that Barnhart also owns the administrative building and property within the unrestricted use area. The area subject to the restrictions is clearly understood by the property owners.

All confirmed that no residential housing/developments or child daycare activities occur at their property on the site.

Ms. Bunn confirmed that no tenants had conducted youth work programs in 2020/2021.

Mr. Ward and Mr. Pedigo confirmed that their companies had not conducted youth work programs in 2020/2021.

Mr. Perkins noted that VVA had not hosted after school and summer youth golf programs since July 2020.

- Obtained current tenant list ([Appendix E1](#)) from Colliers dated 15 July 2021 and ownership map dated 8 March 2021 ([Appendix E2](#)). No residential housing/development or child daycare activities are listed at the MDIP.

- Alpha Omega Veterans Services (AO) maintains a garden of less than one (1) acre on the south end of their property, which is within the area available for Unrestricted Use (Figure 1). The AO garden area was viewed during the visual inspection.
- Verify that no groundwater wells have been installed at the site (except for monitoring and injection wells that were installed as part of the remedy) and that no production/consumptive use of groundwater is occurring.
 - Visual inspection conducted on 15 July 2021. No deficiencies identified.
 - Interviewed Ms. Tyson of SCHD on 15 July 2021 (Appendix C). Ms. Tyson confirmed that the Shelby County Department of Health Water Quality Branch is responsible for administering and enforcing the Rules and Regulations of Wells established and adopted on 27 June 2018 by the Shelby County Groundwater Quality Control Board that include a prohibition on installation of consumptive use wells within ½ mile of the designated boundaries of a listed federal Superfund site, including all areas with groundwater contamination. Ms. Tyson stated that locations of existing wells and of well permits issued within the past year can be requested by email.

Ms. Tyson confirmed that the Rules and Regulations regarding groundwater well construction permitting have not changed since the 2020 inspection. Her office must review and approve all groundwater well construction permits. Licensed well drillers who construct unpermitted wells risk losing their license, having the State of Tennessee levy fines against the well driller and/or property owner, and/or having the State of Tennessee initiate environmental court proceedings against the well driller and/or property owner. Performed an internet search of Tennessee groundwater well installation permit process on 15 July 2021 and confirmed no changes to the regulations or process since July 2020.

A records search for information on well permits within a 4-mile radius of the MI and issued since July 2020 was requested on 26 July 2021. A map documenting the search was provided on 28 July 2021 (Appendix F1). The report states no new wells have been installed within the search radius. There are 15 existing water wells within the search radius, but none are located within 1 mile of the MI boundary. On 28 July 2021, SCHD provided additional information for the existing water wells (Appendix F2).

- Interviewed Ms. Bunn of Colliers, Mr. Ward of Barnhart, Mr. Pedigo of SCS, Mr. Perkins of VVA and Mr. Richardson of EDGE/DRC (Appendix C).
- All confirmed no groundwater extraction wells have been installed at their property on the site and no production/consumptive use of groundwater is occurring.
- Verify that the NLUR is filed with the SCROD and that leases and deeds for property on the MI include the LUC and EPP.
 - On 14 July 2021, searched SCROD website (<http://register.shelby.tn.us>) and confirmed the NLUR for the MI, Instrument 05014108, was recorded on 26 January 2005.
 - On 14 July 2021, conducted a search of SCROD website (<http://register.shelby.tn.us>) to view and confirm that MI deeds/leases issued for MI property since July 2020 include LUC and EPP. The following Instruments are on file:
 - Deed from Army to Depot Redevelopment Corporation of Memphis and Shelby County (DRC) – Instrument 20100579 recorded 17 September 2020 references Instruments 05014108 and 11036907 under Permitted Encumbrances.

- Deed from DRC to Memphis Depot Land LLC – Instrument 21006311 recorded 19 January 2021 references Instruments 05014108 and 11036907 under Permitted Encumbrances.
- Interviewed Ms. Bunn of Colliers, Mr. Ward of Barnhart, Mr. Pedigo of SCS, Mr. Perkins of VVA and Mr. Richardson of EDGE/DRC ([Appendix C](#)).
- Mr. Ward, Mr. Pedigo and Mr. Perkins stated no deeds or leases have been issued for any portion of their property since the 2020 inspection. Mr. Richardson stated that no deed or leases had been issued since 2020 inspection until the deed issued to Memphis Depot Land LLC in 2021 and it contained the LUC and EPP. Ms. Bunn stated leases issued since the 2020 inspection reference the LUC and EPP.

Description of any deficiency or violation of the land use restrictions

No deficiencies or violations identified.

Description of any proposed measures or corrective actions taken to remedy the deficiency or violation

No proposed measures or corrective actions are necessary.

Certification Statement

I, the undersigned, do document that the inspection was performed as indicated above, and that the above information is true and correct to the best of my knowledge, information, and belief.

Date: 15 February 2022
 Name/Title: Thomas Holmes/Project Manager
 Organization: HDR Inc.
 Signature:

Completed annual inspection forms shall be sent within thirty (30) days of the inspection to:

HQ Department of the Army
Deputy Chief of Staff G-9
Attn: DAIN-ISE (James C. Foster, BRAC)
2530 Crystal Drive (Taylor Bldg), Room 5000
Arlington, VA 22202-3940
James.C.Foster10.civ@mail.mil

U. S. Environmental Protection Agency, Region 4
David Keefer, Chief
Restoration & Sustainability Branch, Superfund Division
61 Forsyth Street, SW
Atlanta, GA 30303
Keefer.David@epa.gov

Tennessee Department of Environment and Conservation
Division of Remediation
Memphis Field Office
Attn: Jordan English
8383 Wolf Lake Drive
Bartlett, TN 38133-4199
Jordan.English@tn.gov

Table 1

**Summary of Land Use Controls and Monitoring Requirements
From Main Installation Land Use Control Implementation Plan**

TABLE 1
SUMMARY OF LAND USE CONTROLS AND MONITORING REQUIREMENTS
ANNUAL SITE INSPECTION REPORT
Main Installation - Defense Depot Memphis, Tennessee

Type of control	Purposes of control	Duration	Implementation	Monitoring frequency/responsibility ¹	Affected area
1. Lease Restrictions A. Land Use B. Groundwater	A. Prevent residential use or daycare activities on property. B. Prevent production/ consumptive use of groundwater or drilling of groundwater wells.	The term of the Master Lease ending on August 31, 2052, or the term specified in any sublease.	Master Lease entered into by the Army and the DRC includes EPP. DRC subleases are required to include Master Lease EPP that restrict land use and groundwater use.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify with the DRC that all subleases contain required EPP.	All of the MI property, except Parcels 1 and 2 in FU6.
2. Deed Restrictions A. Land Use B. Groundwater	A. Prevent residential use or daycare activities on property. B. Prevent production/ consumptive use of groundwater or drilling of groundwater wells.	Until the concentration of hazardous substances in the soil and the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use.	Drafted by Army property disposal agent in accordance with Tennessee law and recorded at the Shelby County Register of Deeds office.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify information properly recorded at Shelby County Register of Deeds office(s).	All of the MI property except Parcels 1 and 2 in FU6.
3. Notice of Land Use Restriction A. Land Use B. Groundwater	A. Prevent residential use or daycare activities on property. B. Prevent production/ consumptive uses of groundwater or drilling of groundwater wells.	Until the concentration of hazardous substances in the soil and the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use.	Drafted by Army property disposal agent in accordance with Tennessee law and recorded at the Shelby County Register of Deeds office.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify information properly recorded at Shelby County Register of Deeds office(s).	All of the MI property except Parcels 1 and 2 in FU6.
4. Zoning Restrictions	Allow only certain uses of the property per designation as a Light Industrial zoning district.	Until zoning district designation changes.	Zoning districts designated by City of Memphis and Shelby County LUC Board.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify with the City of Memphis and Shelby County the current zoning designation.	All of the MI property.

TABLE 1
SUMMARY OF LAND USE CONTROLS AND MONITORING REQUIREMENTS
ANNUAL SITE INSPECTION REPORT
Main Installation - Defense Depot Memphis, Tennessee

Type of control	Purposes of control	Duration	Implementation	Monitoring frequency/responsibility ¹	Affected area
5. Groundwater Well Restrictions	Prohibit installation of drinking water well within half-mile of the site and the off-site contaminated groundwater.	Until the site is no longer a Federal Superfund site, or MSCHD determines that the drilling of a well does not pose a threat to a local aquifer.	Groundwater Well Construction Code administered by MSCHD, Water Quality Branch.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification -- Every 5 years as part of the required remedy review under CERCLA. The Army will verify with the MSCHD on the implementation of its regulation.	All of the MI property except Parcels 1 and 2 in FU6.
6. Fence	Restrict public access to prevent unauthorized uses.	Until the concentration of hazardous substances in the soil and the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use.	Erected by the Army and maintained by the City of Memphis.	Site Inspection – Annual. The Army will verify adherence to the LUC. LUC verification -- Every 5 years as part of the required remedy review under CERCLA.	The golf course area located in FU2.

Notes

¹ Prior to transfer of any Depot property, the Army (or its representatives) will perform the monitoring. After transfer, the Army may arrange to have TDEC, the City of Memphis, or some independent third party representative conduct any required monitoring. [See Section 5 below].

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

DRC = Depot Redevelopment Corporation of Memphis and Shelby County

EPP = Environmental Protection Provision

FU = Functional Unit

LUC = Land Use Control

MI = Main Installation [of the Memphis Depot]

MSCHD = Memphis Shelby County Division of Health Services

TDEC = Tennessee Department of Environment and Conservation

Source: *Defense Distribution Center (Memphis) Main Installation Land Use Control Implementation Plan* (LUCIP). CH2MHILL, 2004.

Figures 1 and 2

**Land Use and Groundwater Use Restrictions
From Main Installation Land Use Control Implementation Plan**

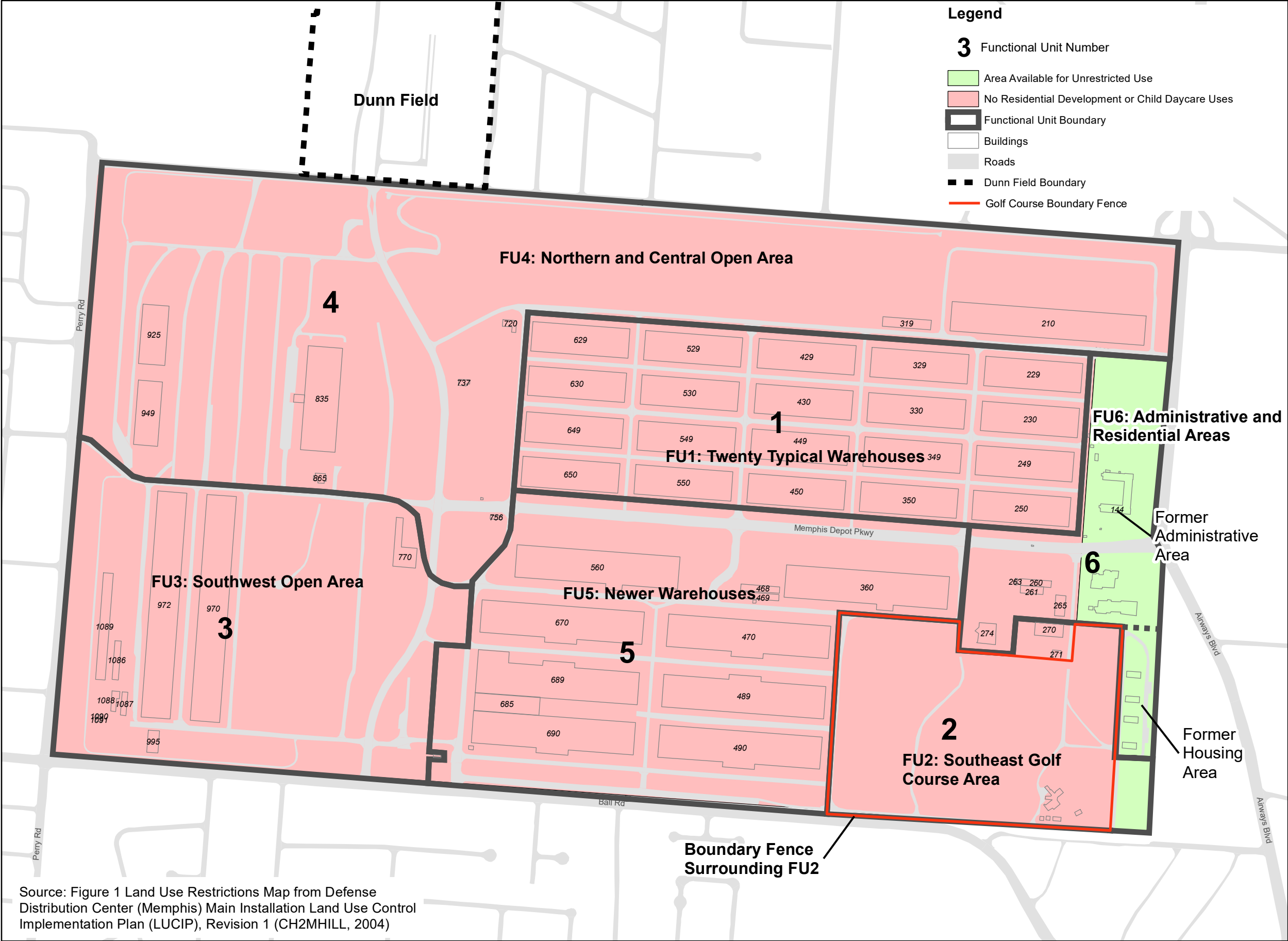


Figure 1

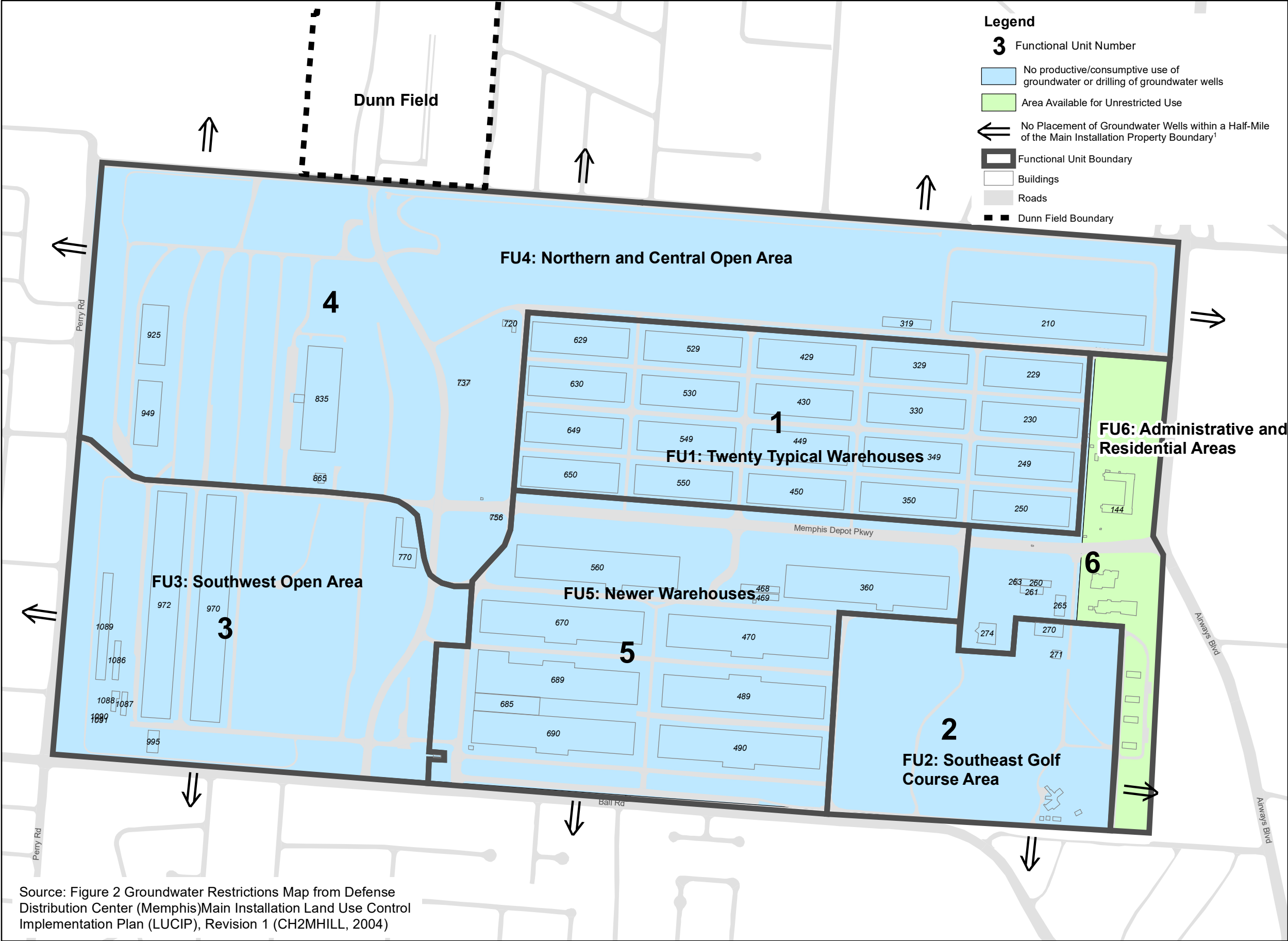
Land Use Restrictions Map

Annual Site Inspection Report

Main Installation
Defense Depot
Memphis, Tennessee

Projection: NAD 1927 StatePlane Tennessee
Units: Feet, Elevation Units: Feet, NAVD88

Date: 8/2/2021
Edition: Rev 0



Legend

3 Functional Unit Number

No productive/consumptive use of groundwater or drilling of groundwater wells

Area Available for Unrestricted Use

No Placement of Groundwater Wells within a Half-Mile of the Main Installation Property Boundary¹

Functional Unit Boundary

Buildings

Roads

Dunn Field Boundary

Figure 2

Groundwater Restrictions Map

Annual Site Inspection Report

Main Installation
Defense Depot
Memphis, Tennessee

Note:

1. Per Shelby County
*Rules and Regulations
of Wells.*

0 500 1,000
Feet

Projection: NAD 1927 StatePlane Tennessee
Units: Feet, Elevation Units: Feet, NAVD88

Date: 8/12/2020
Edition: Rev 0



Source: Figure 2 Groundwater Restrictions Map from Defense Distribution Center (Memphis)Main Installation Land Use Control Implementation Plan (LUCIP), Revision 1 (CH2MHILL, 2004)

Defense Depot Memphis, Tennessee
Dunn Field
2021 Annual Site Inspection Report

Pursuant to the Land Use Controls Implementation Plan (LUCIP) dated September 2008 (Appendix A of Rev. 1 Final Dunn Field Off-Depot Groundwater Remedial Design dated September 2008) for the former Defense Depot Memphis, Tennessee – Dunn Field (Memphis Depot), a visual inspection of property was conducted by HDR, Inc., on 15 July 2021. Photographs from the inspection are provided in [Appendix B](#).

Interviewed Ms. Warkella Tyson, SCHD Pollution Control Division, Water Quality Branch and Septic Tank Program on 15 July 2021; the contact record is provided in [Appendix C](#).

Dunn Field is located across Dunn Avenue from the northwest quadrant of the Main Installation and covers 67 acres. The eastern section of Dunn Field was designated available for unrestricted use. This property was transferred for reuse in 2007; 39.35 acres were transferred to Dunn Field Business Park, LLC via competitive public sale and 1.6 acres were transferred to the City of Memphis via public benefit conveyance. The remaining 26.2 acres in the western section (Dunn Field-West) is still held by Army.

Dunn Field is undeveloped except for access roads, other paved areas, and fencing. The only structure on Dunn Field is the former soil vapor extraction system equipment building in the western area. The LUCs apply only to the western area that is currently held by Army. [Table 1](#) Summary of Land Use Controls and Monitoring Requirements, [Figure 1](#) Land Use Restrictions and [Figure 2](#) Groundwater Use Restrictions from the Dunn Field LUCIP are attached.

The Dunn Field LUC protocol requiring denial of groundwater use or installation of groundwater wells within the sites is being enforced.

A summary of the land use restrictions is as follows:

- No residential land use or other child-occupied facilities including daycare in the Disposal Area/western portion of Dunn Field.
- No production/consumptive use of groundwater or drilling groundwater wells in contaminated groundwater associated with Dunn Field.

Verification that land use restrictions are being accomplished and LUCs remain effective

- Verify that no residential housing/development or child daycare activities are occurring in the Disposal Area/western portion of Dunn Field.
 - Visual inspection conducted on 15 July 2021. No structures or other development are present on the portion of Dunn Field subject to land use restrictions (Dunn Field-West), except for the soil vapor extraction (SVE) equipment building installed for site remediation. SVE operations were halted in 2012 after remediation goals for Dunn Field-West were achieved. The building is used to store the SVE equipment for future use, if necessary.
 - Access to Dunn Field-West is controlled by perimeter fence with locked gates. Visual inspection conducted on 15 July 2021 confirmed the fence was in good condition and that unauthorized use of the property was not observed. The fence adequately prevents unauthorized entry.

- Conducted an on-line search of the Shelby County Office of Planning and Development Land Use Controls Section website (<https://shelbycountyttn.gov/140/Land-Use-Control-Board>) and the zoning atlas (<https://gis.shelbycountyttn.gov/zoning>) on 14 July 2021. The search confirmed that Dunn Field is zoned Industrial District – EMP for Employment (Appendix D1) as per the Memphis and Shelby County Unified Development Code – The Zoning Code and Development Regulations for the City of Memphis and Unincorporated Shelby County approved by the Shelby County Board of Commissioners as Ordinance No. 397 on 9 August 2010, and the Memphis City Council as Ordinance No. 5367 on 10 August 2010 and as amended on 18 October 2016.
- Verify that no groundwater wells have been installed at the site (except for wells that were installed as part of the remedy) and that no production/consumptive use of groundwater is occurring.
 - Visual inspection conducted on 15 July 2021. No deficiencies identified.
 - Interviewed Ms. Tyson of SCHD on 15 July 2021 (Appendix C). Ms. Tyson confirmed that the Shelby County Department of Health Water Quality Branch is responsible for administering and enforcing the Rules and Regulations of Wells established and adopted on 27 June 2018 by the Shelby County Groundwater Quality Control Board that include a prohibition on installation of consumptive use wells within ½ mile of the designated boundaries of a listed federal Superfund site, including all areas with groundwater contamination. Ms. Tyson stated that locations of existing wells and of well permits issued within the past year can be requested by email.

Ms. Tyson confirmed that the Rules and Regulations regarding groundwater well construction permitting have not changed since the 2020 inspection. Her office must review and approve all groundwater well construction permits. Licensed well drillers who construct unpermitted wells risk losing their license, having the State of Tennessee levy fines against the well driller and/or property owner, and/or having the State of Tennessee initiate environmental court proceedings against the well driller and/or property owner. Performed an internet search of Tennessee groundwater well installation permit process on 15 July 2021 and confirmed no changes to the regulations or process since July 2020.

A records search for information on well permits within a 4-mile radius of the MI and issued since July 2020 was requested on 26 July 2021. A map documenting the search was provided on 28 July 2021 (Appendix F1). The report states no new wells have been installed within the search radius. There are 15 existing water wells within the search radius, but none are located within 1 mile of the MI boundary. On 28 July 2021, SCHD provided additional information for the existing water wells (Appendix F2).

Description of any deficiency or violation of the land use restrictions

No deficiencies or violations identified.

Description of any proposed measures or corrective actions taken to remedy the deficiency or violation

No proposed measures or corrective actions are necessary.

Description of whether the use restrictions and controls referenced in Column 1 of Table 1 were communicated in the deed(s)

No deed(s) issued to date.

Describe whether the owners and state and local agencies were notified of the use restrictions and controls affecting the property

State environmental agencies notified of use restrictions and controls via review/approval of the Rev. 1 Final Off-Depot Groundwater Remedial Design. The Notice of Land Use Restrictions was recorded on Thursday, 11 June 2009, in the Register of Deeds, Shelby County, TN; Document No. 09069308.

Certification Statement

I, the undersigned, do document that the inspection was performed as indicated above, and that the above information is true and correct to the best of my knowledge, information, and belief.

Date: 15 February 2022
Name/Title: Thomas Holmes/Project Manager
Organization: HDR Inc.
Signature:

Completed annual inspection forms shall be sent within thirty (30) days of the inspection to:

HQ Department of the Army
Deputy Chief of Staff G-9
Attn: DAIN-ISE (James C. Foster, BRAC)
2530 Crystal Drive (Taylor Bldg), Room 5000
Arlington, VA 22202-3940
James.C.Foster10.civ@mail.mil

U. S. Environmental Protection Agency, Region 4
David Keefer, Chief
Restoration & Sustainability Branch, Superfund Division
61 Forsyth Street, SW
Atlanta, GA 30303
Keefer.David@epa.gov

Tennessee Department of Environment and Conservation
Division of Remediation
Memphis Field Office
Attn: Jordan English
8383 Wolf Lake Drive
Bartlett, TN 38133-4199
Jordan.English@tn.gov

Table 1

**Summary of Land Use Controls and Monitoring Requirements
From Dunn Field Land Use Control Implementation Plan**

TABLE 1
SUMMARY OF LAND USE CONTROLS AND MONITORING REQUIREMENTS
ANNUAL SITE INSPECTION REPORT
Dunn Field - Defense Depot Memphis, Tennessee

Type of control	Purposes of control	Duration	Implementation	Monitoring frequency/responsibility ¹	Affected area
1. Deed and/or Lease Restrictions A. Land use B. Groundwater	A. Prevent residential use or other child-occupied facilities (including daycare) B. Prevent production/ consumptive use of groundwater or drilling of groundwater wells.	Until the concentration of hazardous substances in the soil and the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use.	Drafted by Army property disposal agent Deed recorded at the Shelby County Register of Deeds office.	A. Site Inspection/ LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify information properly recorded at Shelby County Register of Deeds office(s). B. Groundwater well verification – No less than annually the DLA or the Army (or its authorized representative) will conduct field inspection to ensure no production/consumptive use well(s) have been installed.	A. The Disposal Area/western portion of Dunn Field. B. The Disposal Area/western portion and the northern portion of the Northeast Open Area of Dunn Field.
2. Notice of Land Use Restriction A. Land Use B. Groundwater	A. Prevent residential use or other child-occupied facilities (including daycare) B. Prevent production/ consumptive uses of groundwater or drilling of groundwater wells.	Until the concentration of hazardous substances in the soil and the groundwater have been reduced to levels that allow for unlimited exposure and unrestricted use.	Drafted by Army property disposal agent in accordance with Tennessee law and recorded at the Shelby County Register of Deeds office.	A. Site Inspection/ LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify information properly recorded at Shelby County Register of Deeds office(s). B. Groundwater well verification – No less than annually the DLA or the Army (or its authorized representative) will conduct field inspection to ensure no production/consumptive use well(s) have been installed.	A. The Disposal Area/western portion of Dunn Field B. The Disposal Area/western portion and the northern portion of the Northeast Open Area of Dunn Field.
3. Zoning Restrictions	Allow only certain uses of the property per designation as Light Industrial zoning district. Not effective at preventing child-occupied uses including daycare, nursery school or schools K through 12.	Until zoning district designation changes.	Zoning districts designated by City of Memphis and Shelby County LUC Board.	Site Inspection/ LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify with the City of Memphis and Shelby County the current zoning designation.	All of the Dunn Field property (except the northeast area which has been sold to a private owner).

TABLE 1
SUMMARY OF LAND USE CONTROLS AND MONITORING REQUIREMENTS
ANNUAL SITE INSPECTION REPORT
Dunn Field - Defense Depot Memphis, Tennessee

Type of control	Purposes of control	Duration	Implementation	Monitoring frequency/responsibility ¹	Affected area
4. Groundwater Well Restrictions	Prohibit installation of drinking water well within half-mile of the site and the offsite contaminated groundwater.	Until the site is no longer a Federal Superfund site, or MSCHD determines that the drilling of a well does not pose a threat to a local aquifer.	Groundwater Well Construction Code administered by MSCHD, Water Quality Branch.	Site Inspection/ LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify with the MSCHD on the implementation of its regulation. Groundwater well verification – No less than annually the DLA or the Army (or its authorized representative) will conduct field inspection to ensure no production/consumptive use well(s) have been installed.	A. The Disposal Area/western portion and the northern portion of the Northeast Open Area of Dunn Field.
5. Fencing	Restrict public access to prevent unauthorized uses while the site is not regularly occupied.	Until transfer and the site is occupied on a regular basis, pending approval by the Army, EPA and TDEC.	Erected by the Army and is maintained by DLA prior to transfer.	Site Inspection/ LUC verification – Every 5 years as part of the required remedy review under CERCLA. The Army will verify that the fencing while present is in place and is being maintained.	All of the Dunn Field property (except the northeast area, which has been sold to a private owner).
6. Protocol	Restriction of groundwater use and denial of installation of groundwater wells within the site.	The Protocol will terminate and be superseded by the deed restriction upon property transference.	90 days after approval of the LUCIP.	Protocol will be provided to all personnel that are assigned to work on Dunn Field.	All of the Dunn Field property (except the northeast area, which has been sold to a private owner).

Notes

¹ Prior to transfer of any Memphis Depot property, the DLA or the Army (or its representatives) will perform the monitoring. After transfer, the Army may arrange to have TDEC, the City of Memphis, or some independent third party representative conduct any required monitoring. [See Section 5 below].

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

LUC = Land Use Control

DLA = Defense Logistics Agency

MSCHD = Memphis Shelby County Division of Health Services

EPA = US Environmental Protection Agency, Region 4

TDEC = Tennessee Department of Environment and Conservation

Source: Defense Distribution Center (Memphis) Dunn Field Land Use Control Implementation Plan (LUCIP). CH2MHILL, 2006.

Figures 1 and 2

**Land Use and Groundwater Use Restrictions
From Dunn Field Land Use Control Implementation Plan**

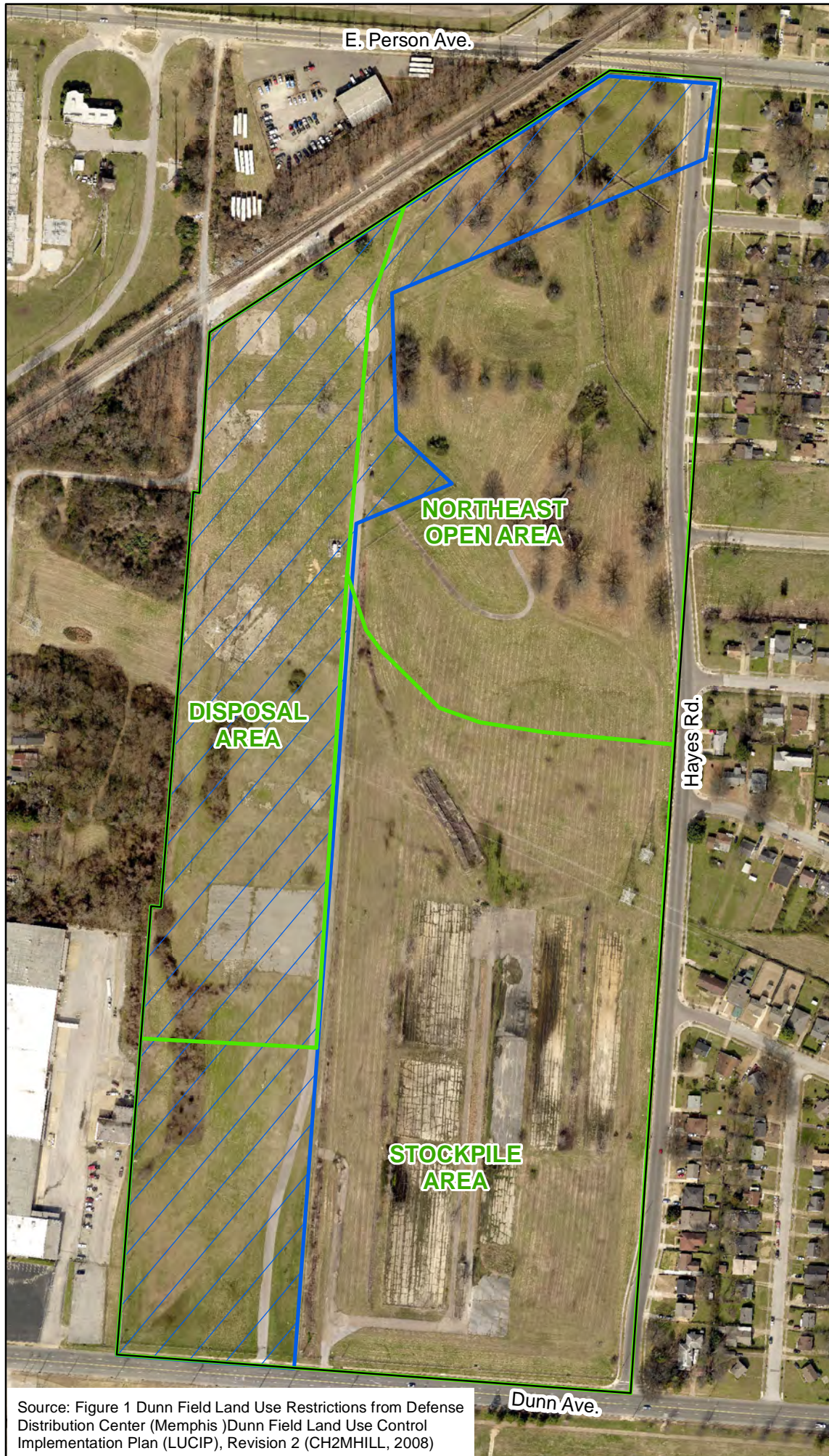


Figure 1

**Land Use Restrictions
Map**

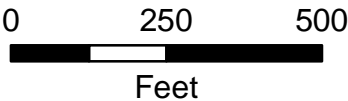
Annual Site Inspection Report

Dunn Field
Defense Depot
Memphis, Tennessee

Legend

- Dunn Field Boundary
- Area Designations
- Land Use Control Boundary
(No residential development or child daycare uses.)

Note:
A perimeter fence is maintained on the Land Use Control Boundary.



Projection: NAD 1927 StatePlane Tennessee
Units: Feet, Elevation Units: Feet, NAVD88

Date: 8/9/2021
Edition: Rev 0



Source: Figure 1 Dunn Field Land Use Restrictions from Defense Distribution Center (Memphis)Dunn Field Land Use Control Implementation Plan (LUCIP), Revision 2 (CH2MHILL, 2008)

Figure 2

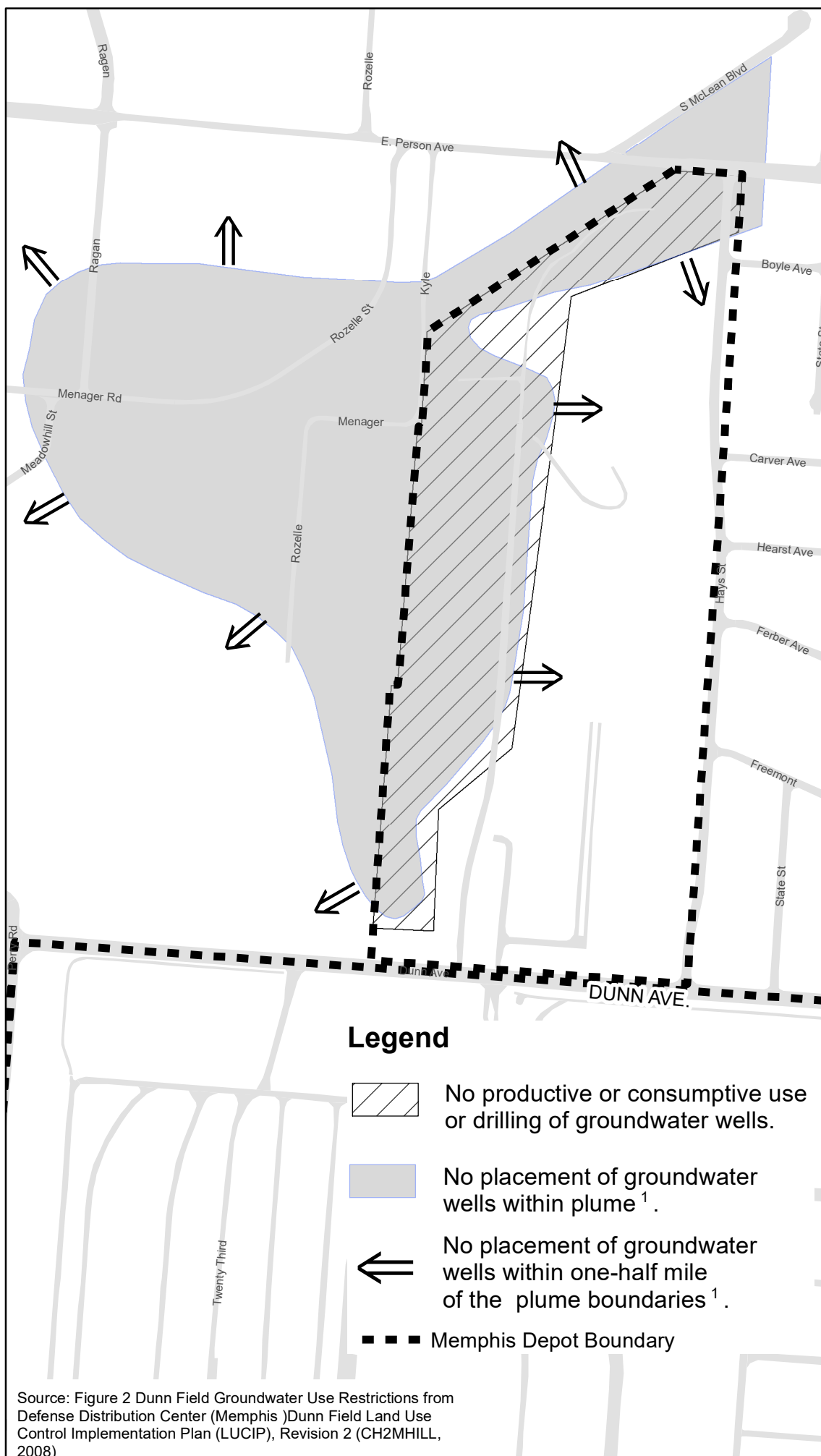
Groundwater Restrictions Map

Annual Site Inspection Report

Dunn Field
Defense Depot
Memphis, Tennessee

Note:

1. Per Shelby County
*Rules and Regulations
of Wells.*



Source: Figure 2 Dunn Field Groundwater Use Restrictions from Defense Distribution Center (Memphis)Dunn Field Land Use Control Implementation Plan (LUCIP), Revision 2 (CH2MHILL, 2008)



0 400 800
Feet

Projection: NAD 1927 StatePlane Tennessee
Units: Feet, Elevation Units: Feet, NAVD88

Date: 6/4/2020
Edition: Rev 0



Appendix A

Responses to Regulatory Agency Comments and Approval Letters



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Remediation
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133-4119

October 25, 2021

James C. Foster
BRAC Program Manager
Headquarters Department of the Army,
Assistant Chief of Staff for
Installation Management (DAIM-ODB)
Army Pentagon,
2530 Crystal Drive,
Arlington, VA 22202-3934

Subject: 2021 Annual DDMT Site Inspection Report
Defense Depot Memphis, Tennessee
TDoR ID # 79-736
TN4210020570

Mr. Foster,

TDEC-DoR has reviewed the 2021 Annual Site Inspection Report (HDR) and approves of the document's contents. If there are questions regarding the approval, please contact me at (901) 371-3041 or at jamie.woods@tn.gov.

Regards,

A handwritten signature in blue ink, appearing to read "J A Woods", with a long horizontal flourish extending to the right.

Jamie A. Woods, P.G.
Project Manager
Division of Remediation
Memphis Environmental Field Office

cc: Joan Hutton (CALIBRE)
T. Holmes (HDR Inc)
D. Lloyd (EPA-PM)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 14, 2022

Mr. James Foster
Base Realignment and Closure Division (ACSIM-ODB)
2530 Crystal Drive (Taylor Building), Room 5000
Arlington, VA 22202-3940

Dear Mr. Foster:

The U.S. Environmental Protection Agency (EPA) has reviewed the U.S. Army's Defense Depot of Memphis 2021 Annual Site Inspection Report.

EPA approves the above mentioned report. Should you have any questions or concerns, please feel free to call me on my cell number 404-229-9500.

Sincerely,

A handwritten signature in cursive script that reads "Diedre Lloyd".

Diedre Lloyd
Remedial Project Manager
Restoration & Sustainability Branch
Superfund & Emergency Management Division

cc: Mr. James Foster, (Signed Original), United Parcel Service, Return Receipt
Mr. Jamie A. Woods, PG, Tennessee, Department of Environment and Conservation, Memphis
Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133-4119
Ms. Joan Hutton, CALIBRE, 3898 Mountain View Road, Kennesaw, GA 30152
Mr. Thomas Holmes, HDR Environmental, P.O. Box 728, Highlands, NC 28741

Appendix B

Site Photographs, 15 July 2021



MI northern fence looking east from W.E. Freeman Drive and Dunn Avenue.



MI northern fence looking west from W.E. Freeman Drive and Dunn Avenue.



Golf course gate and southern fence line along Ball Road.



Golf course northern fence looking west from northeast corner of the golf course at Truitt Street.



Dunn Field southern fence along Dunn Avenue, gate and access road.



Dunn Field looking north along access road from gate on Dunn Avenue, eastern fence on the right.



Dunn Field western fence looking west from the northern end of Dunn Field access road.



Dunn Field western fence looking west from the southern end of Dunn Field access road.

Appendix C

Contact Records

Contact Record

Date:	Wednesday, July 14, 2021		
Project:	DDMT Annual Site Inspection	Project No:	10175160 AC003
Contacted:	Anita Bunn, Colliers Management Services – Memphis LLC	Email:	Anita.bunn@colliers.com
		Phone No:	901-942-4939
By:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I contacted Ms. Anita Bunn of Colliers Management Services – Memphis LLC via phone and left a message on July 14, 2021, requesting she return the call and provide a current tenant list and Memphis Depot Industrial Park (MDIP) property ownership map for use in the Annual Site Inspection.

Ms. Bunn provided the tenant list by email on July 15, 2021. I called her on July 16, 2021 to complete the interview. Ms. Bunn confirmed that Colliers manages approximately 356.1 acres of property at the MDIP owned by Memphis Depot TIC LLC, DP 107 LLC, Depot Owners Association LLC, and Memphis Depot Land LLC.

I explained the purpose of the annual inspection and described the following Land Use Controls (LUC) in place at the Main Installation:

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unlimited use/unlimited exposure area (along eastern boundary that includes Barnhart Crane administrative building, the Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on golf course.
- 2) Deeds and leases for former Memphis Depot property will contain the LUCs and Environmental Protection Provisions (EPP).
- 3) Former Memphis Depot property will not be used for residential purposes (except for former housing area) or child-occupied facilities, including day-care operations.
- 4) No production or consumptive use groundwater wells will be installed on the former Memphis Depot property.

I described the areas covered by the LUCs and asked the following questions. Her responses are provided after the questions.

Do you understand that these LUCs apply to all the former Memphis Depot property owned by Memphis Depot TIC LLC, DP 107 LLC, Depot Owners Association LLC, and Memphis Depot Land LLC? Ms. Bunn: Yes.

Do leases issued since July 2020 include the LUCs and EPPs? Ms. Bunn: Yes, leases issued since July 2020 state the LUCs and EPPs.

Are your lessees aware of the land use controls? Ms. Bunn: Yes. When I review leases with new tenants, we review the entire document including the LUCs and EPPs.

Is the property owned by Memphis Depot TIC LLC, DP 107 LLC, Depot Owners Association LLC, and Memphis Depot Land LLC used for only light industrial purposes with no residential or childcare facilities? Ms. Bunn: The property is only used for light industrial purposes. Neither Memphis Depot TIC LLC, DP 107 LLC, Depot Owner Association LLC, Memphis Depot Land LLC, nor any lessees use the property for residential or child-occupied facilities, including day-care operations. The tenant list and property ownership map support her response that the property managed by Colliers is used for industrial use only.

Residential and childcare restriction may not allow intern programs for people under 18 years old, depending on the activities. Do any lessees have intern programs? Ms. Bunn: No lessees have intern programs for people under 18 years old.

Has Colliers or the property owners installed production or consumptive use groundwater wells on the former Memphis Depot property? Ms. Bunn: No.

Ms. Bunn provided the property ownership map, dated March 8, 2021, by email on July 19, 2021. Memphis Depot TIC LLC and DP 107 LLC own approximately 250.6 acres of property containing about 4 million square feet of buildings and the surrounding land areas. Depot Owners Association owns approximately 35.6 acres containing the Memphis Depot Parkway, W. Freeman Drive, Heyde Avenue, and two storm water retention ponds. Other than three guardhouses, only one is currently in use, there are no structures on the Depot Owners Association LLC property. Memphis Depot TIC LLC and DP 107 LLC created Memphis Depot Land LLC as another legal entity for tax purposes to purchase two undeveloped parcels of approximately 69.9 acres from the Economic Development Growth Engine/Depot Redevelopment Corporation. The sale was completed in January 2021.

Following receipt of the MDIP property ownership map, I emailed Ms. Bunn requesting confirmation that the LUCs were being enforced at the Memphis Depot Land LLC property. Ms. Bunn replied that the two parcels were grassed and contained no buildings. The owners intend to construct an office building on one parcel; the other parcel is being used for material storage. There will be no production/consumptive use groundwater wells installed, nor residential or child care facilities.

Prepared by:
Denise K. Cooper
HDR
Senior Environmental Professional

Contact Record

Date:	Wednesday, July 14, 2021		
Project:	DDMT Annual Site Inspection	Project No:	10175160 AC003
Call to:	Greg Ward, Yard Manager, Barnhart Crane and Rigging	Phone No:	901-568-5202
Call from:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I contacted Mr. Greg Ward, Barnhart Crane Yard Manager, on July 14, 2021. Barnhart Real Estate LLC, One Seven Zero One Dunn Road LLC, and 2163 Airways Blvd LLC are all managed by Barnhart Crane and Rigging (referred to herein as Barnhart). Barnhart owns 143.8 acres including the buildings and former open storage areas on the west side as well as the former administrative building on the east side of the former Memphis Depot.

I explained the purpose of the annual inspection and described the following Land Use Controls (LUCs) in place at the Main Installation.

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unlimited use/unlimited exposure area (along eastern boundary that includes Barnhart Crane administrative building, the Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on golf course.
- 2) Deeds and leases for former Memphis Depot property will contain the LUCs and Environmental Protection Provisions (EPPs).
- 3) Former Memphis Depot property will not be used for residential purposes (except for former housing area) or child-occupied facilities, including day-care operations.
- 4) No production or consumptive use groundwater wells will be installed on the former Memphis Depot property.

I described the areas covered by the LUCs and asked the following questions. Mr. Ward's responses are provided after the questions.

Do you understand that these LUCs apply to all the former Memphis Depot property owned by Barnhart? Mr. Ward: Yes.

Do leases issued since July 2020 include the LUCs and EPPs? Mr. Ward: No leases or deeds have been issued for any Barnhart property since July 2020.

Is the property owned by Barnhart used for only light industrial purposes with no residential or childcare facilities? Mr. Ward: The property is only used for light industrial purposes. None of Barnhart property is used for residential or child-occupied facilities, including day-care operations.

Residential and childcare restriction may not allow intern programs for people under 18 years old, depending on the activities. Does Barnhart have youth intern programs? Mr. Ward: No.

Has Barnhart installed production or consumptive use groundwater wells on the former Memphis Depot property? Mr. Ward: No.

Prepared by:

Denise K. Cooper

HDR

Senior Environmental Professional

Contact Record

Date: Friday, July 16, 2021

Project:	DDMT Annual Site Inspection	Project No:	10175160 AC003
To:	Sean Pedigo, Yard Manager, Supply Chain Solutions	Email:	spedigo@supplychainsolutionsllc.com
		Phone No:	rkeskey@supplychainsolutionsllc.com 901-496-8433
From:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I emailed Mr. Sean Pedigo, Yard Manager, on July 16, 2021, and emailed Mr. Pedigo and Mr. Robert Keskey, Owner of Supply Chain Solutions LLC, on July 19, 2021. In the email, I explained the purpose of the annual inspection and described the following Land Use Controls (LUCs) in place at the Main Installation and at property owned by Supply Chain Solutions:

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unlimited use/unlimited exposure area (along eastern boundary that includes Barnhart Crane administrative building, the Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on golf course.
- 2) Deeds and leases for former Memphis Depot property will contain the LUCs and Environmental Protection Provisions (EPPs).
- 3) Former Memphis Depot property will not be used for residential purposes (except for former housing area) or child-occupied facilities, including day-care operations.
- 4) No production or consumptive use groundwater wells will be installed on the former Memphis Depot property.

Mr. Pedigo responded to the email on Tuesday, July 20, 2021. I called him upon receipt of the email to conduct the interview. He confirmed that Supply Chain Solutions owns 8.2 acres including Building 770 and the surrounding property at the former Memphis Depot.

I described the areas covered by the LUCs and asked the following questions. Mr. Pedigo's responses are provided after the questions.

Do you understand that these LUCs apply to all the former Memphis Depot property owned or leased by Supply Chain Solutions? Mr. Pedigo: Yes.

Do leases issued since July 2020 include the LUCs and EPPs? Mr. Pedigo: Supply Chain Solutions has not issued any leases or deeds for any Supply Chain Solutions property since July 2020.

Is the property owned/leased by Supply Chain Solutions used for only light industrial purposes with no residential or childcare facilities? Mr. Pedigo: The property is only used for light industrial purposes. None of Supply Chain Solutions property is used for residential or child-occupied facilities, including day-care operations.

Residential and childcare restriction may not allow intern programs for people under 18 years old, depending on the activities. Does Supply Chain Solutions have youth intern programs? Mr. Pedigo: No.

Has Supply Chain Solutions installed production or consumptive use groundwater wells on the former Memphis Depot property? Mr. Pedigo: No.

Prepared by:

Denise K. Cooper

HDR

Senior Environmental Professional

Contact Record

Date:	Monday, July 19, 2021		
Project:	DDMT Annual Site Inspection	Project No:	10175160 AC003
To:	Leonard Perkins, President, VVA Chapter 1113 and Manager, Golf Course	Phone No:	901-644-4833
From:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I left a message for Mr. Leonard Perkins, President of Vietnam Veterans Association (VVA) Chapter 1113 and Manager of the golf course, on July 14, 2021. VVA leases the 46.7 acre golf course area at the former Memphis Depot from the City of Memphis.

Mr. Perkins returned the call on July 19, 2021. I explained the purpose of the annual inspection and described the following LUCs at the Main Installation and specific to the golf course.

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unlimited use/unlimited exposure area (along eastern boundary that includes Barnhart Crane administrative building, the Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on golf course.
- 2) Deeds and leases for former Memphis Depot property will contain the LUCs and Environmental Protection Provisions (EPPs).
- 3) Former Memphis Depot property will not be used for residential purposes (except for former housing area) or child-occupied facilities, including day-care operations.
- 4) No production or consumptive use groundwater wells will be installed on the former Memphis Depot property.
- 5) Maintain fence around the golf course area.

I asked him the following questions. His responses are provided after the questions.

Are you aware of the LUCs in place for the Main Installation and specific to the golf course? Mr. Perkins: Yes.

Is VVA using the property for any other purpose than recreation? Mr. Perkins: No, we only use the property for recreational purposes although we do also have an office and golf cart maintenance facility on the golf course property.

Is the property being used for residential or childcare purposes? Mr. Perkins: No. In early July 2020, the VVA stopped the after school and summer golf programs for children ages 7 to 18 due to the pandemic. Mr. Perkins does not know when it will begin again.

Have any production or consumptive use wells been installed on the golf course? Mr. Perkins: No.

Does VVA maintain the golf course fence? Mr. Perkins: Yes. He also confirmed that no major repairs have been needed since July 2020.

Has VVA issued any deeds/leases for the golf course? Mr. Perkins: No.

Prepared by:

Denise K. Cooper

HDR

Senior Environmental Professional

Contact Record

Date: Friday, July 16, 2021

Project:	DDMT Annual Site Inspection	Project No:	10175160 AC003
Call to:	Randy Richardson, Director of Port of Memphis and Vice President of Port and Industrial Property for Economic Development Growth Engine (EDGE) representing the Depot Redevelopment Corporation (DRC)	Phone No:	901-948-4422
Call from:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I called Mr. Randy Richardson of EDGE/DRC on July 16, 2021. Mr. Richardson explained that in 2019 in preparation to sell their property at the former Memphis Depot, they found that the original transfer deeds from the Army to DRC did not correctly describe the parcels planned for transfer. The Army completed a new survey and prepared a corrected deed for transfer of 45.6 acres to EDGE/DRC (Shelby County Register of Deeds [SCROD] Instrument #20100579 recorded September 17, 2020, that includes the Land Use Controls [LUC] and Environmental Protection Provisions [EPP]).

Mr. Richardson reported that EDGE/DRC sold their remaining two parcels (69.9 acres) at the Memphis Depot Industrial Park to Memphis Depot Land LLC (SCROD Instrument #21006311 recorded January 19, 2021, that includes the LUCs and EPPs).

Since EDGE/DRC owned the property from July 2020 to January 2021, we proceeded with the interview. I informed Mr. Richardson of the following LUCs in place at the Main Installation:

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unlimited use/unlimited exposure area (along eastern boundary that includes Barnhart Crane administrative building, the Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on golf course.
- 2) Deeds and leases for former Memphis Depot property will contain the LUCs and EPPs.
- 3) Former Memphis Depot property will not be used for residential purposes (except for former housing area) or child-occupied facilities, including day-care operations.
- 4) No production or consumptive use groundwater wells will be installed on the former Memphis Depot property.

Mr. Richardson confirmed that he understood the LUCs. Prior to selling the property, he confirmed that it was not used for residential purposes or child-occupied facilities, including day care operations, that no production/consumptive use groundwater wells were installed on the property, and that the deed from the Army and the deed to Memphis Depot Land LLC contained the LUCs and EPPs.

Prepared by:

Denise K. Cooper

HDR

Senior Environmental Professional

Contact Record

Date: Wednesday, July 14, 2021

Project:	DDMT Annual Site Inspection	Project No:	10175160 AC 003
Call to:	Warkella Tyson, Supervisor Shelby County Health Department Pollution Control Division Water Quality Branch and Septic Tank Program	Phone No:	901-222-9572
Call from:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2021		

Discussion, Agreement, and/or Action:

I left a voice mail on July 14, 2021, for the Shelby County Health Department (SCHD), Pollution Control Division, Water Quality Branch. The Water Quality Branch manages permitting for the construction of groundwater wells within Memphis and Shelby County.

Ms. Warkella Tyson, Supervisor of the Water Quality Branch and Septic Tank Program, returned the call on July 15, 2021. I explained that the purpose of the annual inspection is to confirm that the groundwater Land Use Control in place for the former Memphis Depot (Main Installation and Dunn Field) is being enforced.

I stated the groundwater LUC: no production or consumptive use groundwater wells will be installed on the former Memphis Depot property or within the groundwater contamination plume that has moved off the property. I asked if Ms. Tyson was aware of the groundwater LUC in place at the former Memphis Depot. Ms. Tyson was aware of the LUCs and of the area covered by the LUCs.

I asked Ms. Tyson if there have been any changes to the groundwater well installation permit regulations and process since July 2020? Ms. Tyson: No. She confirmed that the Shelby County Department of Health Water Quality Branch is responsible for administering and enforcing the Rules and Regulations of Wells established and adopted on June 27, 2018, by the Shelby County Groundwater Quality Control Board that include a prohibition on installation of drinking water wells within a half-mile of the designated boundaries of a listed federal Superfund site, including all areas with groundwater contamination.

How does the Water Quality Branch enforce the well installation regulations and processes to ensure installation of non-permitted wells? Ms. Tyson: If non-permitted wells are installed by licensed well installers, the Water Quality Branch will cancel their license. The State of Tennessee may also levy fines against the well installers and/or property owner and/or initiate environmental liability proceedings in State of Tennessee court.

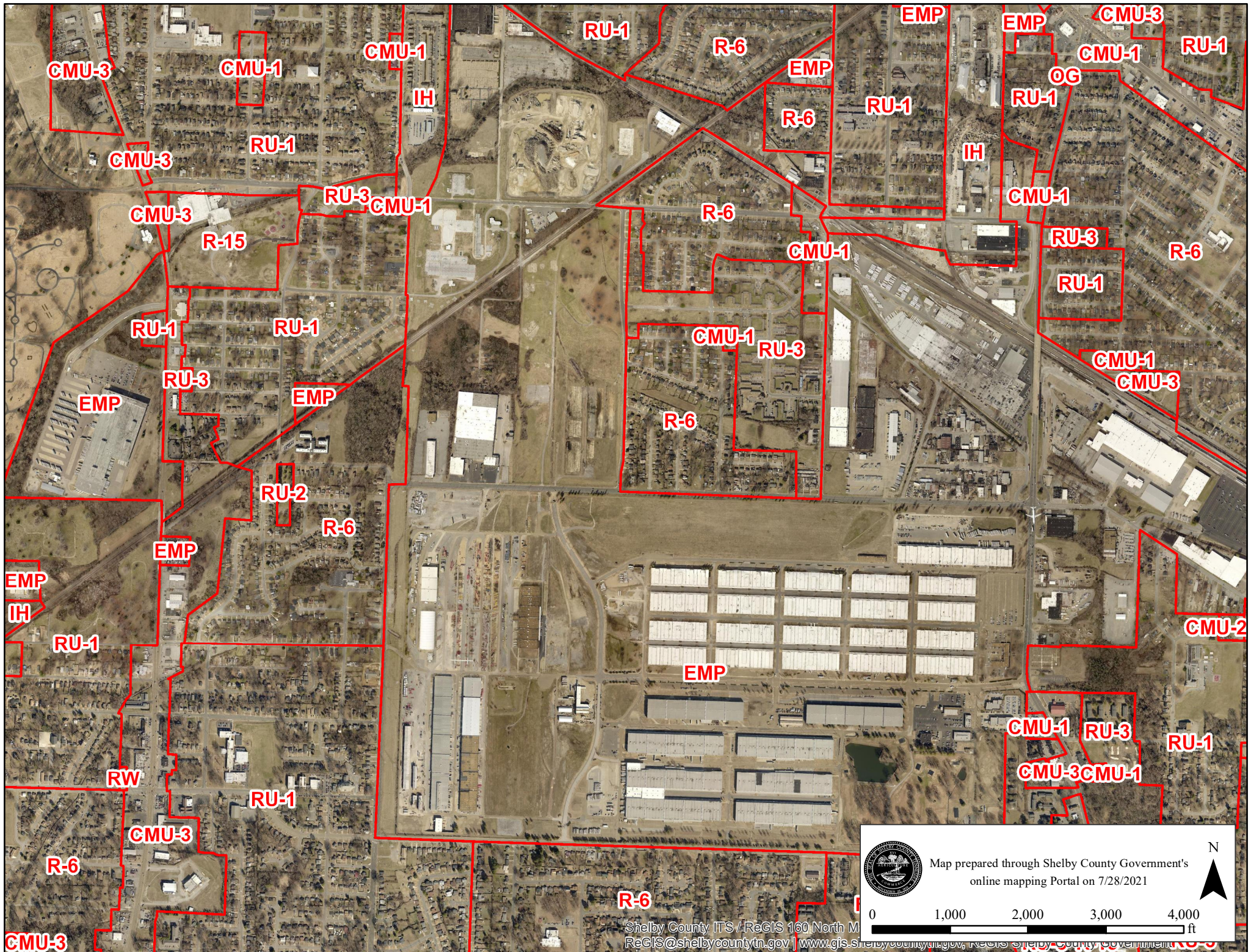
I asked Ms. Tyson if any well permits had been issued since the last inspection in July 2020. She stated a request for a groundwater well permit search should be submitted via email with a specified search radius. A search request for a 4-mile radius from a central location on the Main Installation was submitted on July 26, 2021 and the map with search results was received on July 28, 2021. The map states no new water wells are located within the search radius but

shows locations for 13 water wells within the search radius and two water wells just outside the search radius. Following an email request, SCHD provided additional information on the 13 well locations.

Prepared by:
Denise K. Cooper
HDR
Senior Environmental Professional

Appendix D

Zoning and Land Use Maps

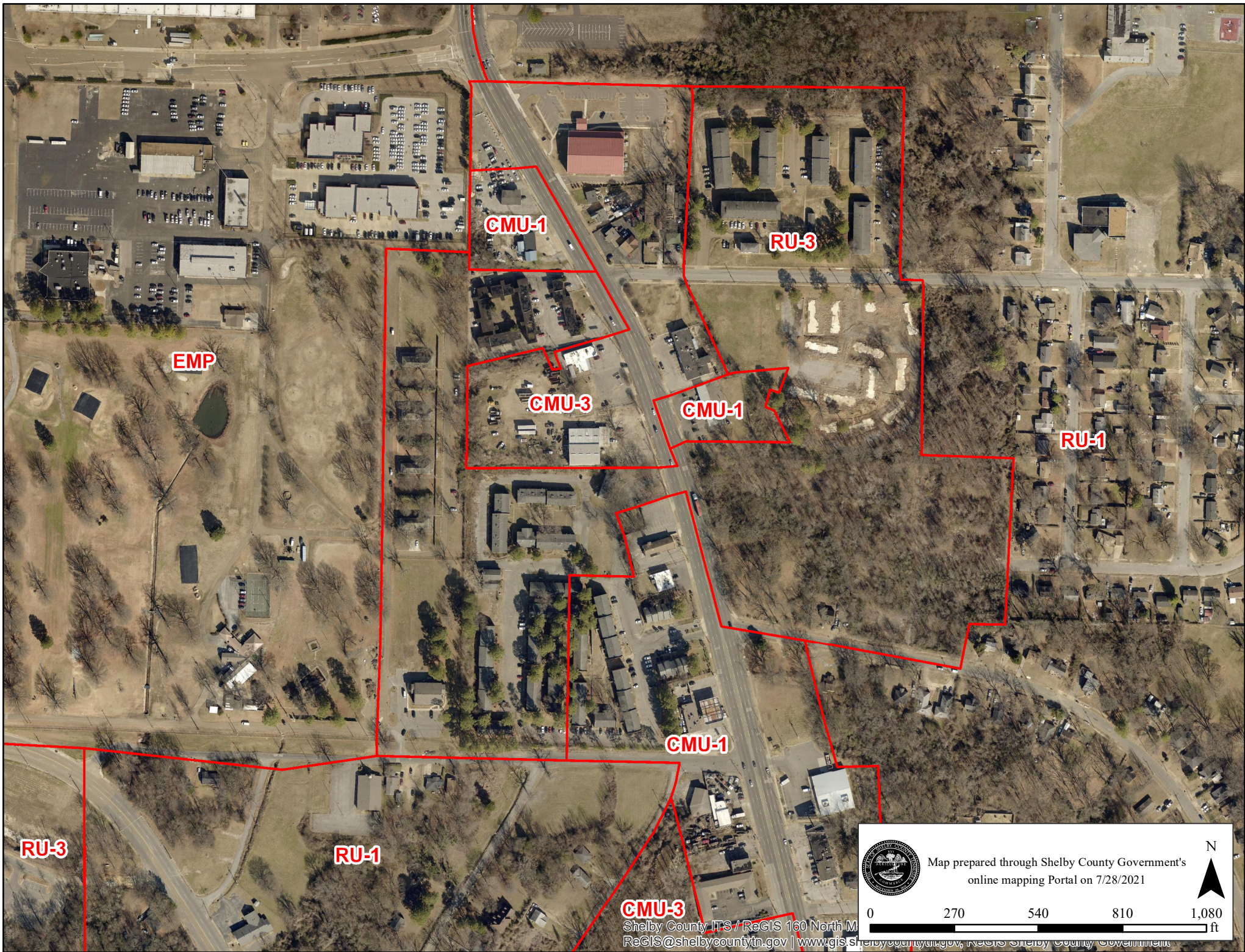


Map prepared through Shelby County Government's
online mapping Portal on 7/28/2021



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Shelby County ITS / ReGIS 160 North Main
ReGIS@shelbycountyttn.gov | www.gis.shelbycountyttn.gov




Map prepared through Shelby County Government's
online mapping Portal on 7/28/2021













0 270 540 810 1,080
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CMU-3

Shelby County ITS / ReGIS 160 North Main
ReGIS@shelbycountyttn.gov | www.gis.shelbycountyttn.gov, ReGIS Shelby County Government










-  Shelby County Zoning
-  Arlington Zoning
-  Bartlett Zoning
-  Collierville Zoning
-  Germantown Zoning
-  Lakeland Zoning
-  Millington Zoning

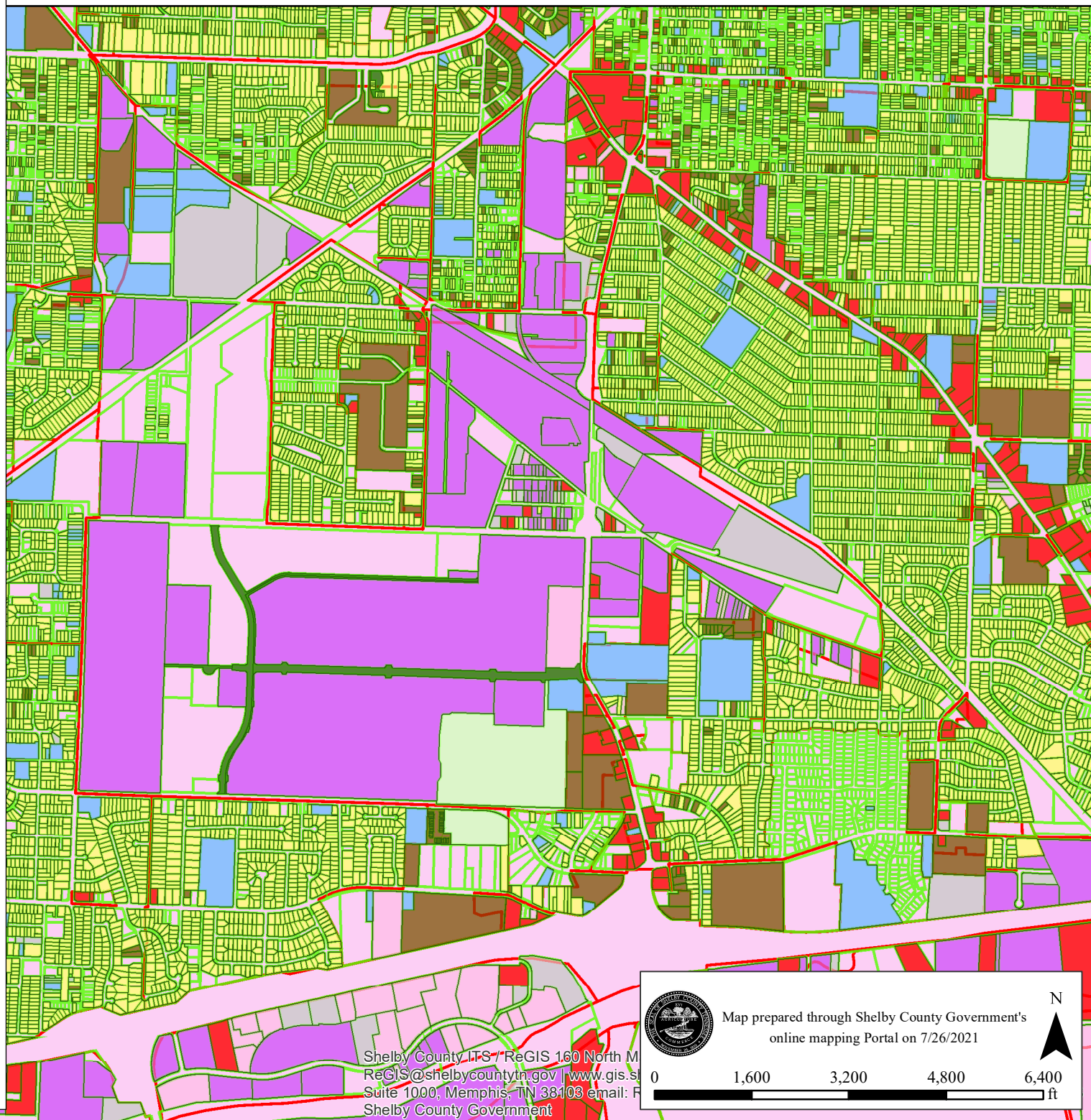
Land Use

-  COMMON AREA LAND
-  SINGLE-FAMILY
-  MULTI-FAMILY
-  INSTITUTIONAL
-  COMMERCIAL
-  OFFICE
-  INDUSTRIAL
-  PARKING
-  RECREATION/OPEN SPACE
-  VACANT

Corporate Boundaries

<all other values>

-  Arlington
-  Bartlett
-  Collierville
-  District 1
-  District 2
-  Germantown
-  Lakeland
-  Memphis
-  Millington



Map prepared through Shelby County Government's
online mapping Portal on 7/26/2021



0 1,600 3,200 4,800 6,400
ft

Shelby County ITS / ReGIS 160 North M
ReGIS@shelbycountytg.gov | www.gis.s
Suite 1000, Memphis, TN 38103 email: R
Shelby County Government

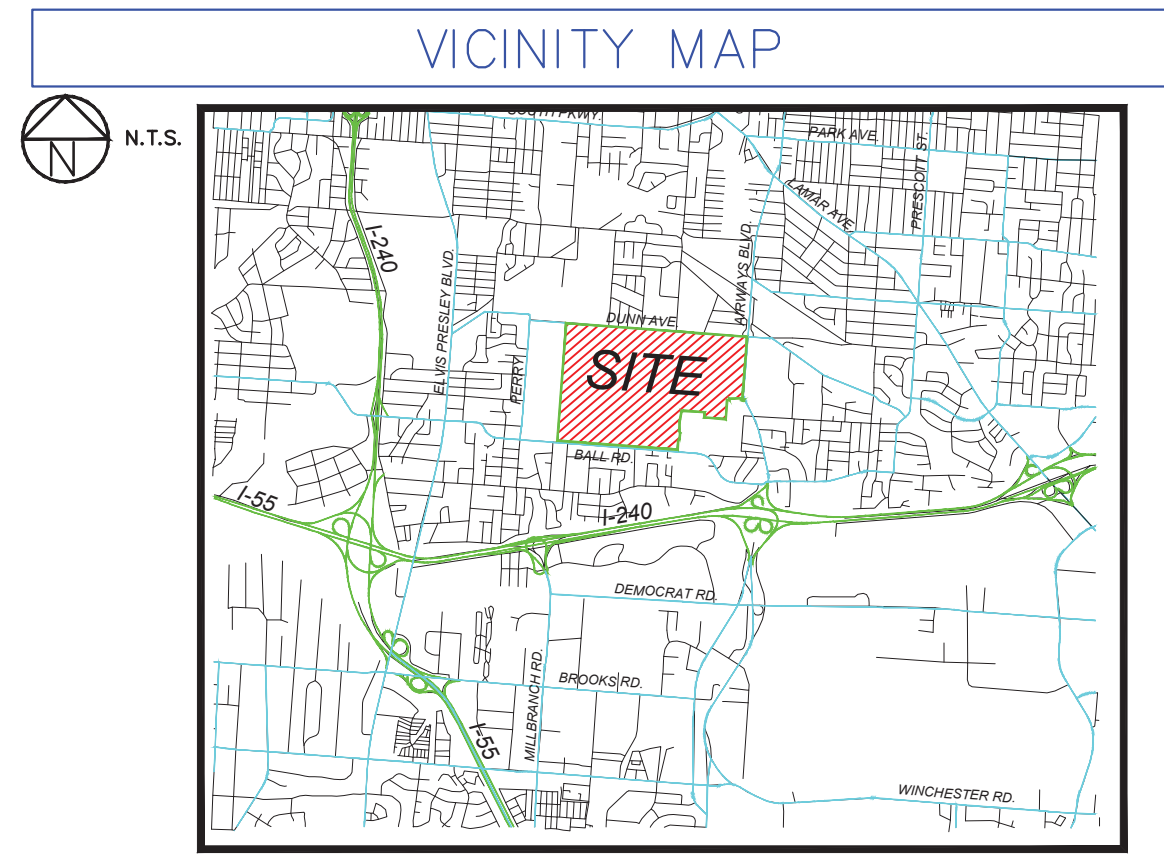
Appendix E

Memphis Depot Industrial Park Tenant List and Ownership Map

Memphis Depot Industrial Park

7/15/2021

Building/Bays	Tenant	Address	Square Feet
210-1	Vacant	2158 Heyde	22,037
210-2,3	reLogistics Services	2158 Heyde	43,933
210-7,8,9	Barnhart	2158 Heyde	43,920
210-4,5,6	Supply Chain	2158 Heyde	65,901
210-10	City of Memphis	2158 Heyde	22,037
229	Cargill	2127 Heyde	109,994
230	Cargill	2128 Troyer	109,994
249-1a	Tylur French/Youngblood	2129 Troyer	7,000
249-1b	Vacant	2129 Troyer	14,837
249-2,3,4	Supply Chain	2129 Troyer	66,000
249-5	City of Memphis	2129 Troyer	22,037
250	Versant Supply Chain	2130 Memphis Depot Pkw	110,010
260, 261	Maintenance Shop	2237 Truitt	11,838
265-1,2,10	HDR Engineering	2241 Truitt	3,926
265-3,4,5,6,7,8,9	Milli Morton	2241 Truitt	3,957
270	City of Memphis	2245 Truitt	14,080
271	Management Office	2249 Truitt	1,530
274	Gate Gourmet	2222 Lloyd	14,186
319-1	Brighter Days & Nites	2090 Heyde	1,500
319-2,3	Felts Interiors	2090 Heyde	4,500
319-4	General Moving	2090 Heyde	4,000
319-5	Parks & Parks	2090 Heyde	3,000
319-6	Patton & Taylor	2090 Heyde	3,000
329	Cargill	2105 Heyde	109,994
330	Supply Chain	2100 Troyer	109,994
349	Supply Chain	2095 Troyer	109,994
350	Supply Chain	2090 Memphis Depot Pkw	109,994
360	Banded Holdings/Avery Outdoors	2050 Danielson Place	207,963
429	Cargill	2031 Heyde	109,994
430	Supply Chain	2028 Troyer	109,994
449	Supply Chain	2029 Troyer	109,994
450	Supply Chain	2030 Memphis Depot Pkw	109,994
465, 468, 469	Bean & Prince	1996 Danielson Place	19,600
470	Nickey Warehouse	1996 Behnke	207,921
489	Nickey Warehouse	1997 Behnke	207,921
490	Nickey Warehouse	1994 Amido	207,921
529	Supply Chain	1965 Heyde	109,994
530	Supply Chain	1990 Troyer	109,994
549	Supply Chain	1993 Troyer	109,994
550	Supply Chain	1964 Memphis Depot Pkw	109,994
560	UPS Supply Chain	1910 Danielson Place	206,758
629	Supply Chain	1905 Heyde	109,994
630	Supply Chain	1908 Troyer	109,994
649	Supply Chain	1905 Troyer	109,994
650	Supply Chain	1910 Memphis Depot Pkw	109,994
670	Nickey Warehouse	1900 Danielson Place	208,010
685	Supply Chain	2300 Sitler	45,942
689 Bay 1,2,3,4	Nickey Warehouse	2300 Sitler	167,839
689 Bay 5	Supply Chain	2300 Sitler	48,696
690 Bays1,2,3,4	Supply Chain	1908 Amido	166,456
690-5	Supply Chain	1908 Amido	40,200
720	General Moving	2045 Sitler	4,665
737	M & W Transportation	2205 Sitler	1,198
795	Vacant	2351 WE Freeman	600
			4,204,811



LEGEND

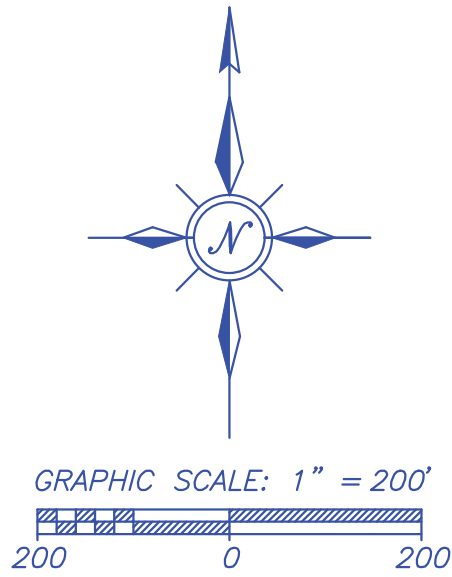
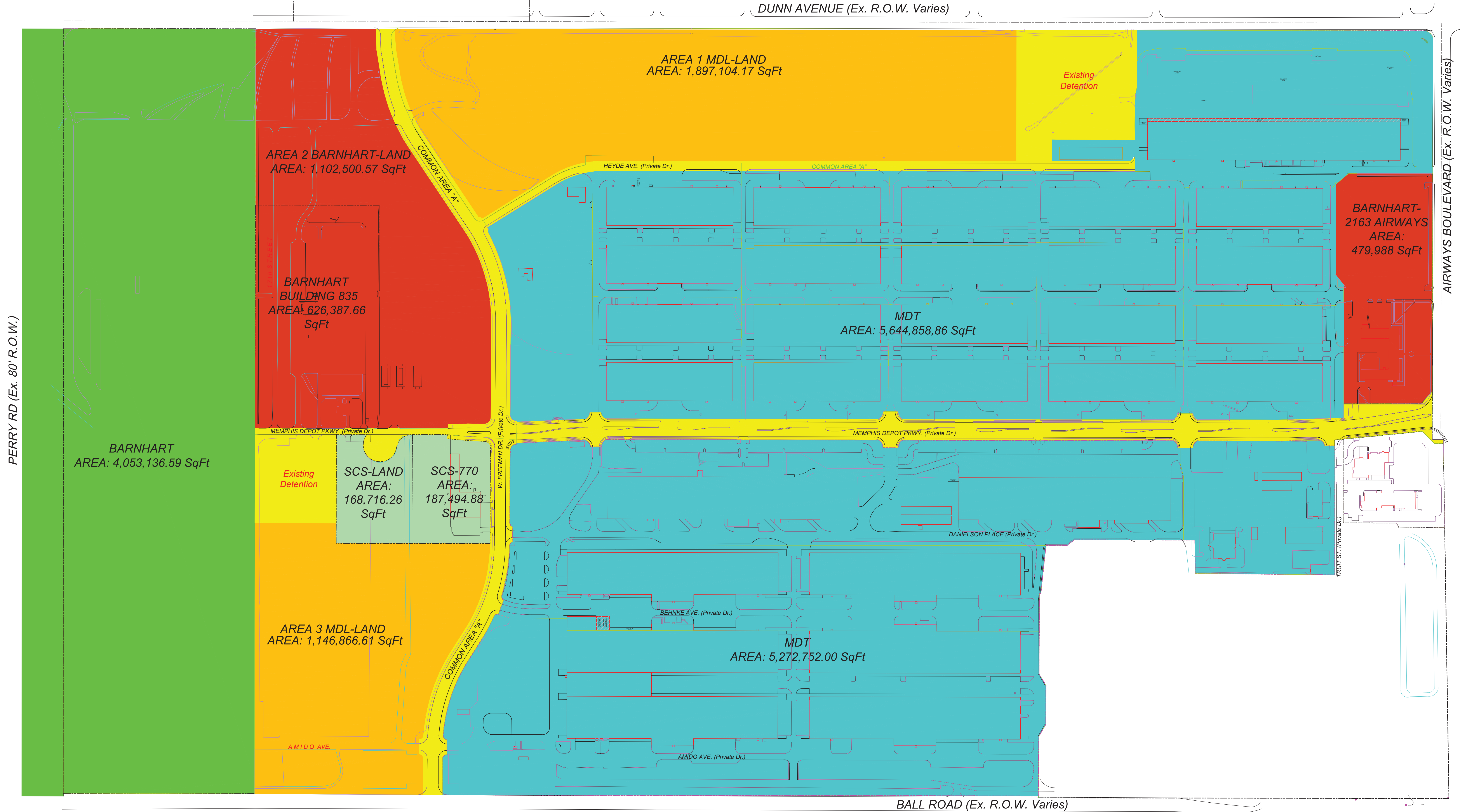
- MEMPHIS DEPOT LAND, LLC: 1,897,104.17 SqFt (AREA 1 MDL-LAND); 1,146,866.61 SqFt (AREA 3 MDL-LAND); Total: 3,043,970.78 SqFt
- MEMPHIS DEPOT TIC, LLC: 5,644,858.86 SqFt (MDT); 5,272,752.00 SqFt (MDT); Total:10,917,610.86 SqFt
- DEPOT OWNERS ASSOCIATION: 1,550,332 SqFt (includes Memphis Depot Pkwy, W. Freeman Dr, Heyde Ave and Detention Areas)
- BARNHART CRANE: 479,988 SqFt (BARNHART-2163 Airways Blvd); 1,102,500.57 SqFt (AREA 2 BARNHART-LAND); 626,387.66 SqFt (BARNHART BUILDING 835) Total: 2,208,876.23 SqFt
- SCS LEASING: 187,494.88 SqFt (SCS-770); 168,716.26 SqFt (SCS-LAND); Total: 356,211.14 SqFt

TOTAL AREA: 18,077,001.01 SqFt

LAND USE MAP

MEMPHIS DEPOT INDUSTRIAL PARK
MEMPHIS, SHELBY COUNTY
TENNESSEE

REVISED: 03-08-2021



BARNHART: 4,053,136.59 SqFt [Not a member of Depot Owners Association, LLC]

A2H

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Memphis, TN Jackson, TN Nashville, TN
3009 Davies Plantation Road 901.372.0404
Lakeland, TN 38002 www.A2H.com

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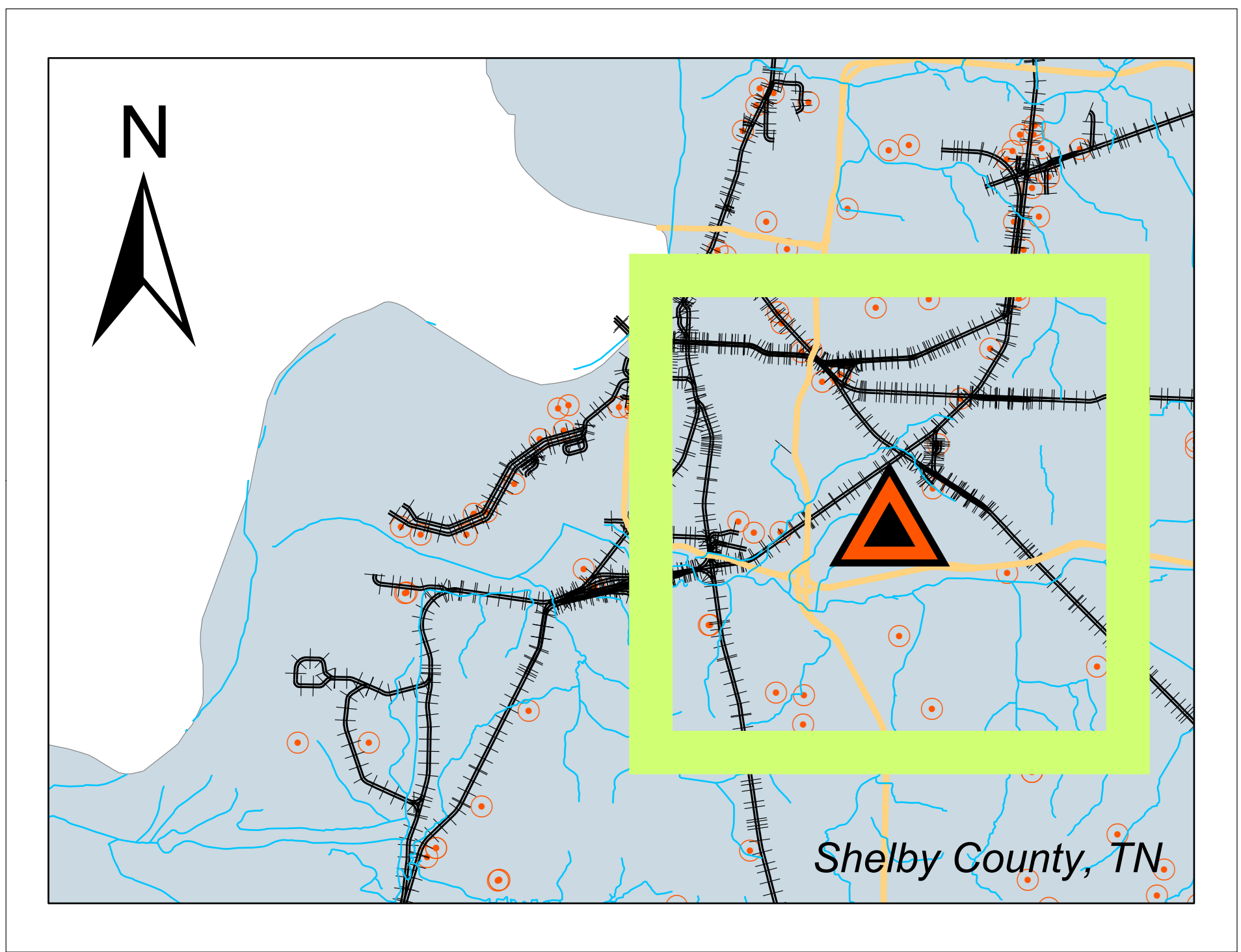
Appendix F

Water Well Search Results

SHELBY COUNTY HEALTH DEPARTMENT

Pollution Control | Water Quality Branch

Dunn Field - Memphis Denfense Depot

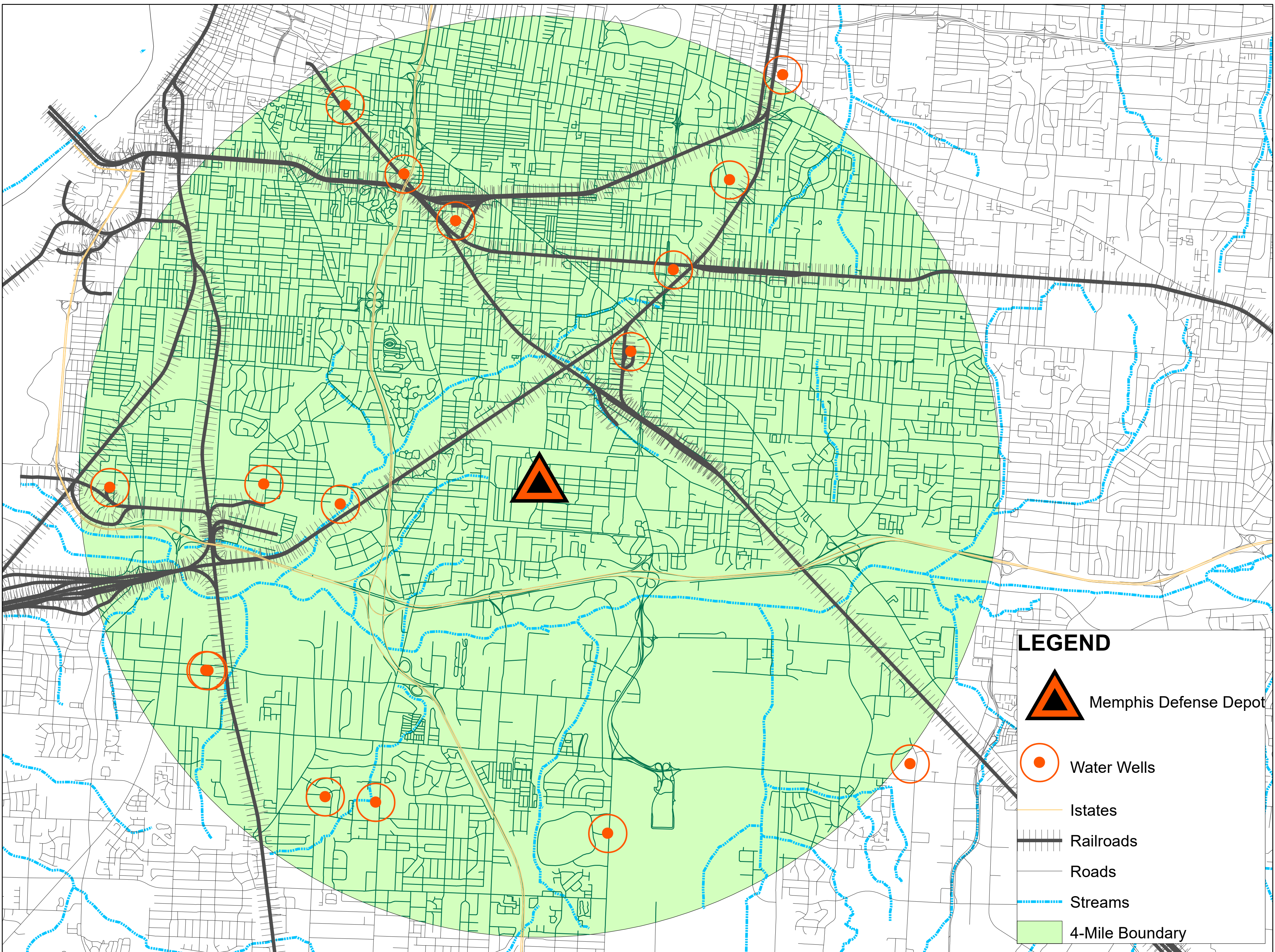


WATER WELL SEARCH

4 Mile Radius of 2163 Airways Blvd

16 Records Found.

A 4-mile radius well search found no new water wells within search boundary of the former Memphis Defense Depot located at 2163 Airways Blvd, Memphis, TN 38114.



4-Mile Radius

WELL SEARCH REPORT

13 Active Wells Found.

Owner	Location	Map Page	Map Section	Wells	Class/ Capacity/ Depth [A]	Class/ Capacity/ Depth [B]	Class/ Capacity/ Depth [C]	Class/ Capacity/ Depth [D]	Class/ Capacity/ Depth [E]
AMERICOLD LOGISTICS	1100 E PARKWAY S	43	H	2	C 500 300'	C 500 400'			
CONAGRA GROCERY PRODUCTS	1351 WILLIAMS AVE	42	D	4	C 500 1000'	C 500 1000'	C 500 750'	C 524 1000'	C 520 1000'
MEMPHIS BIOFUEL	2227 DEADRICK AVE	43	R	1	C 458 1200'				
VERIZON	240 S. HOLLYWOOD	37	N	1	QP 131 40'				
DREXEL CHEMICAL CO.	2487 PENNSYLVANIA	51	O	1	C 45 250'				
PETTITS LAWNSCAPES, LLC	255 SCOTT ST	37	B	1	SP 0 0'				
M.R.S FIBERGLASS & RUBBER	341 EAST BROOKS RD	62	M	1	C 0 0'				
GRACELAND	3734 ELVIS PRESLEY	72	H	1	I 0 0'				
VALLEY PRODUCTS	384 E. BROOKS RD	62	M	1	C 336 300'	F 126 200'	F 339 0'		
FEDERAL EXPRESS CORP.	3975 AIRWAYS	73	L	3	C 385 175'				
MEMPHIS HOUSING AUTHORITY	600 S. SOMERVILLE	35	L	1	I 300 40'				
AMERIPRIDE	830 VANCE	35	F	1	C 500 250'				
PERMA FIX OF MEMPHIS	901 E. BODLEY AVE	52	K	2	RE 70 120'				

Wednesday, July 28, 2021

Acronyms

C - Commercial Water Well

QP - Quasi-Public Well

SP - Special Purpose

I - Irrigation Water Well

RE - Recovery Well

F - Filled