



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G9
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WASHINGTON, DC 20310-0600

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MEMORANDUM FOR

City of Memphis and Shelby County Elected Officials, Civic Representatives and
Former Restoration Advisory Board Members

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

The Department of Army is pleased to notify you that a Five-Year Review will be conducted under the Comprehensive Emergency Response, Compensation and Liability Act (CERCLA) for the selected remedies at:

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

The purpose of this Five-Year Review is to determine whether the remedies at the Former DDMT remain protective of human health and the environment. The methods, findings and conclusions of the review will be documented in a Five-Year Review report, and, if any issues are identified, recommendations will be provided to address them.

The selected remedies for DDMT were described in the Main Installation Record of Decision approved in 2001, the Dunn Field Record of Decision approved in 2004, and the Dunn Field Record of Decision Amendment approved in 2009. The contaminants of concern are metals, petroleum hydrocarbons and volatile organic compounds (VOCs) in soil and chlorinated volatile organic compounds (CVOCs) in groundwater.

The selected remedy for the Main Installation was:

- Excavation, transportation and off-site disposal of lead-contaminated surface soil near Building 949.
- Deed restrictions and site controls on residential land use, daycare facilities, drilling and groundwater use, and site access.
- Enhanced bioremediation of CVOCs in the most contaminated part of the groundwater plume.
- Long-term groundwater monitoring.

The selected remedy, as amended, for Dunn Field included:

- Excavation, transportation, and disposal of soil and material within disposal sites.

- In situ thermal desorption in shallow fine-grained subsurface soils and soil vapor extraction (SVE) in deeper coarse-grained subsurface soils to reduce VOC concentrations.
- Injection of zero-valent iron within Dunn Field to treat CVOCs in the most contaminated part of the groundwater plume and installation of an air sparging and SVE system to remediate CVOCs within the offsite areas of the groundwater plume.
- Monitoring natural attenuation and long-term groundwater monitoring.
- Implementation of land use controls consisting of deed and/or lease restrictions, Notice of Land Use Restrictions, zoning restrictions and groundwater well restrictions.

All selected remedies have been implemented. Construction, operation and performance monitoring for the remedies were documented in interim remedial action completion reports, which were reviewed and approved by the U.S. Environmental Protection Agency (USEPA) and Tennessee Department of Environment and Conservation (TDEC). Additional site information is available from the online Information Repository at <https://ww3.sam.usace.army.mil/DDMT>. You may also find information online at: <http://www.epa.gov/region4/superfund/sites/fedfac/memdedpttn.html>.

The implemented remedies have either met cleanup standards or are making progress toward the standards, except for groundwater contamination on the Main Installation. Enhanced bioremediation was implemented on the Main Installation in 2006 to 2009 and 2012 to 2014. While concentrations of groundwater contaminants were reduced, the reductions were not sufficient to meet the cleanup standards. A Supplemental Remedial Investigation was performed from 2015 to 2021, and a draft Focused Feasibility Study has been prepared to develop a remedial strategy to achieve cleanup standards throughout the Main Installation.

The Dunn Field on-site remedies were implemented on in 2007 to 2012. While concentrations of groundwater contaminants were reduced below cleanup criteria, long-term groundwater monitoring identified contaminant increases at two monitoring wells in the west-central portion of Dunn Field beginning in 2013. A field investigation was performed in 2020 and 2021 that included sampling of soil, soil vapor and groundwater, and human health risk assessment. Additional land use controls have been recommended for protection of human health. All activities are being performed with review and concurrence from USEPA and TDEC.

The National Contingency Plan requires that remedial actions that results in any hazardous substances, pollutants or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure to be reviewed every five years to ensure the protection of human health and the environment. This is the fifth Five Year Review for the Former DDMT and is to be signed by January 2023. Notification of report completion and availability for public review will be provided at that time.

The Department of Army invites community participation in the Five-Year Review process. If you would like further information or to comment on the protectiveness of the selected remedy or remedial actions at the Former DDMT, please call the Community

Involvement Line at (901) 774-3683 or send an email to denise.cooper@hdrinc.com. Comments will be accepted through May 15, 2022.

A public notice inviting comments from the community for the Five-Year Review will be published in the Memphis Commercial Appeal on March 16, 2022.

For additional information please contact: Mr. Tom Holmes, HDR Project Manager at (404) 295-3279, email: thomas.holmes@hdrinc.com; or Mr. Bill Millar, BRAC Environmental Coordinator at (703) 819-0100, email: william.w.millar.ctr@army.mil.

for

Encl

JAMES C. FOSTER
Program Manager,
Base Realignment and Closure Field Branch

cc:

Elected Officials

The Honorable Jim Strickland, Mayor of the City of Memphis
The Honorable Lee Harris, Mayor of Shelby County
Councilperson Jamita Swearengen, Memphis City Council District 4
Councilperson Joe Brown, Memphis City Council Super District 8 Position 1
Councilperson Cheyenne Johnson, Memphis City Council Super District 8 Position 2
Councilperson Martavius Jones, Memphis City Council Super District 8 Position 3
Commissioner Reginald Milton, Shelby County Commission District 10

Civic Representatives

Dr. Tyler Zerwekh, Shelby County Health Department
Mr. Reid Dulberger, Economic Development Growth Engine
Mrs. Juanita Ford Boothe, Memphis Light Gas and Water

Former Restoration Advisory Board Community Representatives

Mr. Mondell Williams
Ms. Doris Bradshaw
Ms. Elizabeth J. Young
Mr. Reginald Eskridge
Ms. Peggy Brooks
Mr. Stanley Tyler
Mr. Dave Bond
Mr. Ulysses Truitt

Regulatory Agency Representatives

Ms. Diedre Lloyd, U.S. Environmental Protection Agency, Region 4
Mr. Jamie Woods, Tennessee Department of Environment and Conservation