



REGION 4

ATLANTA, GA 30303

April 26, 2024

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 United States Environmental Protection Agency (USEPA) is granting approval for the 2024 Site Management Plan, Final, submitted by the United States Army (USARMY/Lead Agency), in April 2024 for the Defense Depot Memphis, Tennessee (DDMT) site. However, this approval is conditional on the USARMY presenting a plan to address any identified deficiencies to the regulators within 30 days of this letter.

Generally, the EPA concurs that the USARMY has addressed most of the concerns raised during the reviews up to the Final revision, except for the need to discuss the paths forward to address the recent exceedances observed at the Dunn Field area, and to demonstrate current compliance with the Land Use Controls (LUC), per the Record of Decision (ROD), for the former defense depot, as required under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Contingency Plan (NCP).

Given the current exceedances at the Dunn Field area, the EPA will require the use of the most recent data to determine whether the concentration trends from the Dunn Field plume remain below the action levels for individual Chlorinated Volatile Organic Compounds (CVOCs). This assessment will help the regulatory agencies weight the decision on whether the Lead Agency could proceed with the abandonment of monitoring wells, the continuation of the active remedy, or if additional actions might be necessary before the disposition of the land use and to ensure the remedy's long-term protection of human health and the environment.

Therefore, for Dunn Field, the EPA requests that the Lead Agency provide regulators with additional data to demonstrate that concentrations of individual chlorinated volatile organic compounds (CVOCs) remain below the 50 µg/L action level. This should include at least one year of data with four consecutive sampling events after the last exceedances were identified. By conducting this comprehensive analysis of the new data, the Lead Agency can provide the

EPA with the necessary evidence that the remedial actions have been effective in reducing CVOC levels at the site to acceptable levels.

Additionally, the Lead Agency must address the issues with the fences and the missing CERCLA signage to allow for complete protection through the established LUCs for both the Main Installation and Dunn Field, as specified in the RODs and the Land Use Control Implementation Plan (LUCIP). These LUCs will remain in place until the concentrations of Contaminants of Concern [COCs] have been reduced to levels that allow for unlimited use and unrestricted exposure, in accordance with CERCLA and the NCP. The Lead Agency must also demonstrate that the LUCs remain effective and that the land use restrictions are being achieved, as per the RODs, LUCIPs, and the Site's Federal Facilities Agreement (FFA), to ensure the selected remedy remains protective over the long-term.

Therefore, the Lead Agency must complete the necessary repairs and address the LUCs deficiencies immediately to avoid further delays with the Remedial progress and property transfer.

Overall, the EPA consider these issues as substantial for assessing the current standing for property transfer, compliance with site inspection, addressing protectiveness not limited to the Five-Year Review requirements, and risk assessments, as required under the RODs, Site's FFA, CERCLA and the NCP. This aims to ensure the remedial actions at DDMT are effective and in compliance, and that the remedial approach remains appropriate and effective over time.

The USEPA commends the USARMY for its efforts on further investigating the DDMT environmental conditions. If you have any questions about this letter, please contact me via email at martinez-torres.fernando@epa.gov or at 404-695- 4991.

Sincerely,

Fernando Martinez Torres
Remedial Project Manager
Department of Defense Section
Superfund & Emergency Management Division
United States Environmental Protection Agency

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