



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

25 July 2024

SUBJECT: Fencing at Dunn Field former Defense Depot Memphis, Tennessee (DDMT).

Mr. Fernando Martinez-Torres, U.S. Environmental Protection Agency (USEPA) Region 4
Jamie Woods, Tennessee Department of Environment and Conservation (TDEC)

Dear Mr. Martinez-Torres and Mr. Woods,

The fencing at Dunn Field is described in the Dunn Field Record of Decision (ROD) (2004) and the Land Use Control Implementation Plan (LUCIP) (Appendix A of the Memphis Depot Dunn Field Off-Depot Groundwater Final Remedial Design, September 2008). The ROD is a signed agreement between the Army, EPA and TDEC specifying how the fencing component of the remedy should be used in the remediation of the site. The fencing discussed in the ROD includes fencing around the area still owned by the Army in 2004, currently referred to as Dunn Field West (DFW). The DFW area is fenced, and the Army is maintaining this fencing. The ROD indicates that the Army will maintain the fencing until DFW is transferred out of Army ownership. The Dunn Field LUCIP applies only to the DFW Area. Regarding fencing, the LUCIP was written in compliance with the ROD. The ROD further indicates that temporary fencing and signage will be maintained around remedial construction areas during remedial activities. This is the only reference to signage in the ROD concerning Dunn Field. Permanent signage is not required by the ROD or the LUCIP.

The eastern area of Dunn Field currently referred to as Dunn Field East includes the "Stockpile Area" and the "Northeast Open Area" described in the ROD and the annual Site Management Plans (Figure 1). The only clean-up action in Dunn Field East was the pistol range removal action completed by the Army in 2003 prior to the signing of the ROD in 2004. In the ROD the Dunn Field East area was made available for "unrestricted reuse" and "no further action" was required. This is further described in the January 2009 Dunn Field ROD Amendment, page 6, "[t]he eastern portion of Dunn Field, including most of the Northeast Open Area and the Stockpile Area with approximately 41 of the total 64 acres, was found to be suitable for unrestricted use." Dunn Field East (Figure 1) was remediated to a level of reuse that did not require any restrictions or ongoing remedy and there is no unacceptable risk from a release or threatened release from the soil in the area. Therefore, land use controls (LUCs) on the parcel are unnecessary. When the Army owned this parcel, it was fenced, and the Army maintained the fence for security purposes. Following sale of Dunn Field East, the fence has fallen into disrepair and the current owner of the parcel is not maintaining the fence, but the fence is not a requirement of a CERCLA remedy.

The Dunn Field ROD selected Excavation, Transportation and Off-site Disposal with Institutional Controls for soil remediation of the disposal sites. The remedial action was within the perimeter fence for Dunn Field, and additional fencing was not required. Following the sale

of Dunn Field East, the Army installed new fencing separating DFW and Dunn Field East and continues to maintain the perimeter fence for DFW. Once the rebound area at DFW is remediated, near surface soils will not exceed industrial land use soil risk requirements.

The ROD or LUCIP does not require fencing after the DFW property is transferred.

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.

Sincerely,

for

JAMES C. FOSTER
Program Manager,
Base Realignment and Closure
Office of the Deputy Chief of Staff, G-9

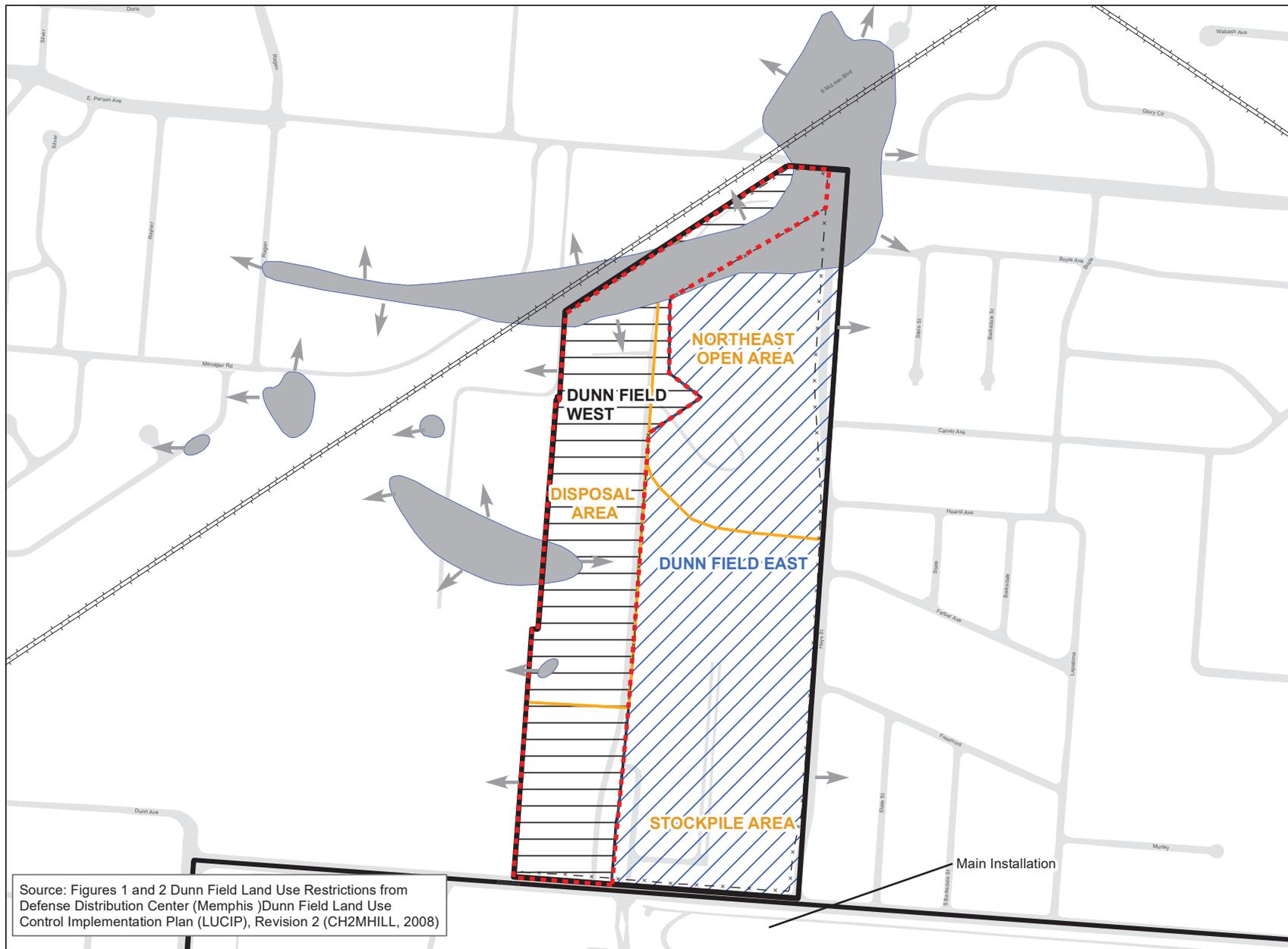


Figure 1

Dunn Field Land and Groundwater Use Restrictions

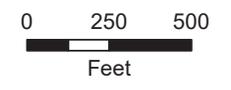
Annual Site Inspection Report
 Defense Depot
 Memphis, Tennessee

Legend

- Railroad
- Fence
- Fence Required by Dunn Field ROD
- Original Property Boundary
- Extent of plume based on October 2023 LTM groundwater concentrations exceeding maximum contaminant levels or target concentrations from the Dunn Field Record of Decision.
- Area Designations
- Roads

Use Restrictions:

- Unrestricted Use Area
 - Area subject to use restrictions
- No placement of groundwater wells within a half mile of Dunn Field West and plume boundaries, per Shelby County Rules and Regulations.



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

Date: 5/13/2024
 Edition: Rev 0



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