

# 2024 Annual Site Inspection

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

Final  
March 2025



**Defense Depot Memphis, Tennessee****Main Installation****2024 Annual Site Inspection Report**

The former Defense Depot Memphis, Tennessee (DDMT) - Main Installation (MI) contains approximately 567 acres with open storage areas, warehouses, former military family housing, and outdoor recreational areas. The MI property has been transferred for reuse through public benefit and economic development conveyances.

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 May 30, 2024. Photographs taken during the inspection are provided in [Appendix B](#). Interviews with the following personnel were conducted from May 28 through June 12, 2024, and documented in [Appendix C](#):

- Ms. Cindy Forsythe of Colliers Management Services-Memphis LLC (Colliers), Memphis Depot Industrial Park (MDIP) property manager. Ms. Forsythe was contacted on May 28, 2024 via email and responded on May 31, 2024.
- Mr. David Dingeldein, Yard Manager of Barnhart Crane (Barnhart). Mr. Dingledein was contacted on May 28, 2024 via email and responded on June 7, 2024.
- Mr. Sean Pedigo, Yard Manager of Supply Chain Solutions LLC (SCS). Mr. Pedigo was contacted on May 28, 2024 via email and responded on May 31, 2024.
- Reverend Leonard Perkins, President of Vietnam Veterans Association Chapter 1113 (VVA) and Manager of the golf course. Reverend Perkins was contacted on May 28, 2024 via email and responded on June 1, 2024.
- Ms. Warkella Tyson, Supervisor of Shelby County Health Department (SCHD) Pollution Control Division, Water Quality Branch and Septic Tank Program. Ms. Warkella Tyson was contacted on May 31, 2024, via email and on June 4 and 12, 2024 via telephone. Additional communication with Ms. Warkella Tyson occurred on June 12, 27, and 28, 2024.

**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 along the eastern boundary).
- No production/consumptive use of groundwater or drilling groundwater wells on the MI.
- Eliminate casual access to the golf course through maintenance of a boundary fence.
- 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).

A summary of Land Use Controls and Monitoring Requirements is presented on [Table 1](#), and a figure depicting the area of the MI subject to land and groundwater use restrictions from the MI LUCIP is presented on [Figure 1](#).

Most of the MI is zoned for industrial use. The LUCIP identifies the area along the eastern boundary of the MI, which contains the former administrative area and the former housing area (Parcels 1 and 2), as approved for unrestricted use. Zoning restrictions limit residential use to

the former housing area and Shelby County Health Department (SCHD) regulations prohibit installation of groundwater wells within ½-mile of the MI property boundary and associated groundwater plumes. The golf course is limited to recreational use per the transfer deed from the Department of the Interior; the land and groundwater use restrictions apply as well.

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

- Verify that boundary fence surrounding the golf course area remains intact.
  - Visual inspection conducted on May 30, 2024. No deficiencies or required repairs to the boundary fence surrounding the golf course were identified. Photographs of the boundary fence are provided in [Appendix B](#).
  - VVA obtained the lease for the golf course from the City of Memphis and took over operations in January 2020. Rev. Perkins confirmed via email that VVA was responsible for maintaining the fence around the golf course ([Appendix C3](#)). The MI Record of Decision does not require signage on the fence. VVA performs grounds maintenance regularly throughout the year and checks the fence for damage. No damage to the fence was observed during the inspection on May 30, 2024. VVA works quickly to repair damage when identified.
- Verify that no residential housing/development or child daycare activities are occurring at the site (except Parcels 1 and 2 along the eastern boundary).
  - Visual inspection conducted on May 30, 2024. No deficiencies identified.
  - 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>) was conducted on May 29, 2024. 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 August 9, 2010, the Memphis City Council as Ordinance No. 5367 on August 10, 2010, and as amended on October 18, 2016. There are two exceptions: the former housing area is zoned Residential (RU-3) ([Appendix D2](#)); and the golf course area, while zoned EMP, is identified as Recreation/Open Space ([Appendix D3](#)).
  - Contacted Ms. Forsythe of Colliers, Mr. Dingeldein of Barnhart, Mr. Pedigo of SCS, and Rev. Perkins of VVA ([Appendix C](#)) via email. Each email noted that the land use restrictions apply to all the MI, except the area available for unrestricted use along the eastern boundary. The restriction on potable water wells, which is enforced by SCHD, applies to the area within ½-mile of the MI boundary and groundwater plume extents. The areas subject to the land use restrictions are clearly understood by the property owners.
 

The owners confirmed that no residential housing or child daycare activities occur at their properties on the MI. Ms. Forsythe confirmed that no tenants conduct youth work programs. Mr. Dingeldein and Mr. Pedigo confirmed that their companies do not conduct youth work programs. Rev. Perkins noted that VVA will host summer youth golf programs in June/July 2024.
  - Obtained current tenant list ([Appendix E1](#)) from Colliers dated May 31, 2024, and ownership map dated May 31, 2024 ([Appendix E2](#)). No residential housing/development or child daycare activities are listed at the MDIP.

- 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 was performed on the MI on May 29, 2024. No new water wells were identified on the MI.
  - Ms. Forsythe of Colliers, Mr. Dingeldein of Barnhart, Mr. Pedigo of SCS, and Rev. Perkins of VVA were contacted via email ([Appendix C](#)). All confirmed no groundwater extraction wells have been installed at their property and no production/consumptive use of groundwater is occurring.
  - Ms. Tyson of SCHD was emailed on May 31, 2024 regarding Shelby County enforcement of the prohibition on water well construction within one-half mile of the designated boundaries of a mandated or voluntary remediation site involving groundwater contamination or potential contamination (Section 4, 4.01, C). During calls on June 4 and 12, 2024, Ms. Tyson confirmed that the Rules and Regulations regarding groundwater well construction permitting have not changed since the 2023 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. No active water production wells were identified within the one-half mile exclusion zone. Additional information is provided in [Appendix F](#).
- 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 June 4, 2024, SCROD website (<http://register.shelby.tn.us>) was searched and confirmed the NLUR for the MI, Instrument 05014108, was recorded on 26 January 2005.
  - On June 4, 2024, 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 2023 include LUC and EPP. No instruments conveying MI property were identified since July 2023.
  - Contacted Ms. Forsythe of Colliers, Mr. Dingeldein of Barnhart, Mr. Pedigo of SCS, and Rev. Perkins of VVA via email ([Appendix C](#)). Mr. Dingeldein and Rev. Perkins stated no deeds or leases have been issued for any portion of their property since July 2023. Mr. Dingeldein indicated Barnhart entered into a verbal agreement with Shoaf Motor Sales allowing automobile storage on a portion of Barnhart property (figure attached to contact report in [Appendix C](#)). Mr. Pedigo was unsure about deeds or leases as owner unavailable to provided information. Ms. Cooper searched the SCROD website and found SCS had issued no deeds or leases for SCS property at DDMT. Ms. Forsythe stated leases issued since July 2023 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: March 26, 2025  
Name/Title: Clayton Mokri/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)  
600 Army Pentagon  
Washington, DC 20310-0600  
[James.C.Foster10.civ@mail.mil](mailto:James.C.Foster10.civ@mail.mil)

Caroline Y. Freeman  
Director Superfund and Emergency Management Division  
U.S. Environmental Protection Agency - Region 4  
61 Forsyth Street S.W.  
Atlanta, GA 30303  
[freeman.caroline@epa.gov](mailto:freeman.caroline@epa.gov)

Tennessee Department of Environment and Conservation  
Division of Remediation  
Memphis Field Office  
Attn: Merrie A. Salyers  
8383 Wolf Lake Drive  
Bartlett, TN 38133-4199  
[Merrie.Salyers@tn.gov](mailto:Merrie.Salyers@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 <sup>1</sup>	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.
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.
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.
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 <sup>1</sup>	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.
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.

**Notes**

<sup>1</sup> 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.

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

DRC = Depot Redevelopment Corporation of Memphis and Shelby County

EPP = Environmental Protection Provision

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.

**Figure 1**

**Main Installation Land and Groundwater Use Restrictions**



**Defense Depot Memphis, Tennessee****Dunn Field****2024 Annual Site Inspection Report**

Dunn Field is located across Dunn Avenue from the northwest quadrant of the Main Installation and covers 67 acres; it is undeveloped except for access roads, other paved areas, and fencing. The only structure on Dunn Field is the former soil vapor extraction (SVE) system equipment building in the western area (Dunn Field West).

The eastern section of Dunn Field (Dunn Field East) was designated for unrestricted use and was transferred for reuse in 2007 ([Figure 2](#)); 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, Dunn Field West, is held by Army and subject to land use restrictions.

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 May 29, 2024. Photographs taken during the inspection are provided in [Appendix B](#).

Ms. Warkella Tyson, Shelby County Health Department (SCHD) Pollution Control Division, Water Quality Branch and Septic Tank Program was contacted. Ms. Warkella Tyson was contacted via email on May 31, 2024 and on June 4 and 12, 2024 via telephone. Additional communication with Ms. Warkella Tyson occurred on June 12, 27, and 28, 2024. The contact record is provided in [Appendix C](#).

**A summary of the land use restrictions is as follows:**

- No residential land use or other child-occupied facilities including daycare in the Dunn Field West.
- No production/consumptive use of groundwater or drilling groundwater wells in contaminated groundwater associated with Dunn Field.
- Temporary access barriers (i.e., fence) and signage preventing unauthorized entry during the remedial construction activities.

[Table 2](#) Summary of Land Use Controls and Monitoring Requirements and [Figure 2](#) Land and Groundwater Use Restrictions from the Dunn Field LUCIP are attached. The land use controls (LUCs) apply only to Dunn Field West, which is currently owned by Army. However, zoning restrictions prevent residential use and SCHD regulations prevent installation of groundwater wells for Dunn Field and areas within ½-mile of associated groundwater plumes. The Dunn Field LUCIP protocol requiring denial of groundwater use or installation of groundwater wells within Dunn Field is being enforced.

**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 Dunn Field West.
  - Visual inspection conducted on May 29, 2024. No structures or other development are present on the portion of Dunn Field subject to land use restrictions (Dunn Field West), other than the pre-existing SVE equipment building. SVE operations were halted in 2012



after remediation goals 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 May 29, 2024, and June 5, 2024, confirmed the fence was in good condition and that unauthorized use of the property was not observed. The fence was installed to prevent unauthorized access; it was not required for ecological protection. The fence adequately prevents unauthorized entry.
- Vegetation on the Dunn Field West perimeter fence ([Figure 2](#)) was removed in December 2023. Repairs were completed at 17 locations along the Dunn Field West perimeter fence in January and February 2024.
- 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>) was conducted on May 29, 2024. 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 August 9, 2010, and the Memphis City Council as Ordinance No. 5367 on August 10, 2010 and as amended on October 18, 2016.
- Verify that no groundwater wells have been installed at the site (except for wells installed as part of the remedy) and that no production/consumptive use of groundwater is occurring.
  - Based upon a visual inspection of the Dunn Field and the offsite property, no production/consumptive use groundwater wells appear to be present on May 29, 2024. Water supply wells were not observed from the public right of way during 2024 long term monitoring events or other field activities.
  - Ms. Tyson of SCHD was emailed on May 31, 2024 regarding Shelby County enforcement of the prohibition on water well construction within one-half mile of the designated boundaries of a mandated or voluntary remediation site involving groundwater contamination or potential contamination (Section 4, 4.01, C). During calls on June 4 and 12, 2024, Ms. Tyson confirmed that the Rules and Regulations regarding groundwater well construction permitting have not changed since the 2023 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. No active water production wells were identified within the one-half mile exclusion zone. Additional information is provided in [Appendix F](#).

#### **Description of any deficiency or violation of the land use restrictions.**

- In 2023 damage to the fence was identified by Army at 12 locations. In January and February 2024, Army repaired the fence as documented in the attached photolog ([Appendix G](#)).
- In December 2024, vegetation was removed from the Dunn Field fence. A summary of the vegetation removal was submitted to EPA on January 16, 2025. During the December 2024 vegetation removal and subsequent inspection, damage to the fence was identified at several areas as documented in the attached summary ([Appendix G](#)).

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

- Army will perform fence repairs, identified in the **December 2024 Fence Clearing Inspection (Appendix G)**, and document the repairs in the 2025 LUC Inspection Report

**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 were 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: March 26, 2025  
Name/Title: Clayton Mokri/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)  
600 Army Pentagon  
Washington, DC 20310-0600  
[James.C.Foster10.civ@mail.mil](mailto:James.C.Foster10.civ@mail.mil)

Caroline Y. Freeman, Director  
Superfund and Emergency Management Division  
U.S. Environmental Protection Agency - Region 4  
61 Forsyth Street S.W.  
Atlanta, GA 30303  
[freeman.caroline@epa.gov](mailto:freeman.caroline@epa.gov)

Tennessee Department of Environment and Conservation  
Division of Remediation  
Memphis Field Office  
Attn: Merrie A. Salyers  
8383 Wolf Lake Drive  
Bartlett, TN 38133-4199  
[Merrie.Salyers@tn.gov](mailto:Merrie.Salyers@tn.gov)

**Table 2**

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

TABLE 2  
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 <sup>1</sup>	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.	Dunn Field West
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.	Dunn Field West
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 Dunn Field

TABLE 2  
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 <sup>1</sup>	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.	All 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.	Dunn Field West
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.	Dunn Field West

**Notes**

<sup>1</sup> 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.

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

LUC = Land Use Control

DLA = Defense Logistics Agency

MSCHD = Memphis Shelby County Division of Health Services

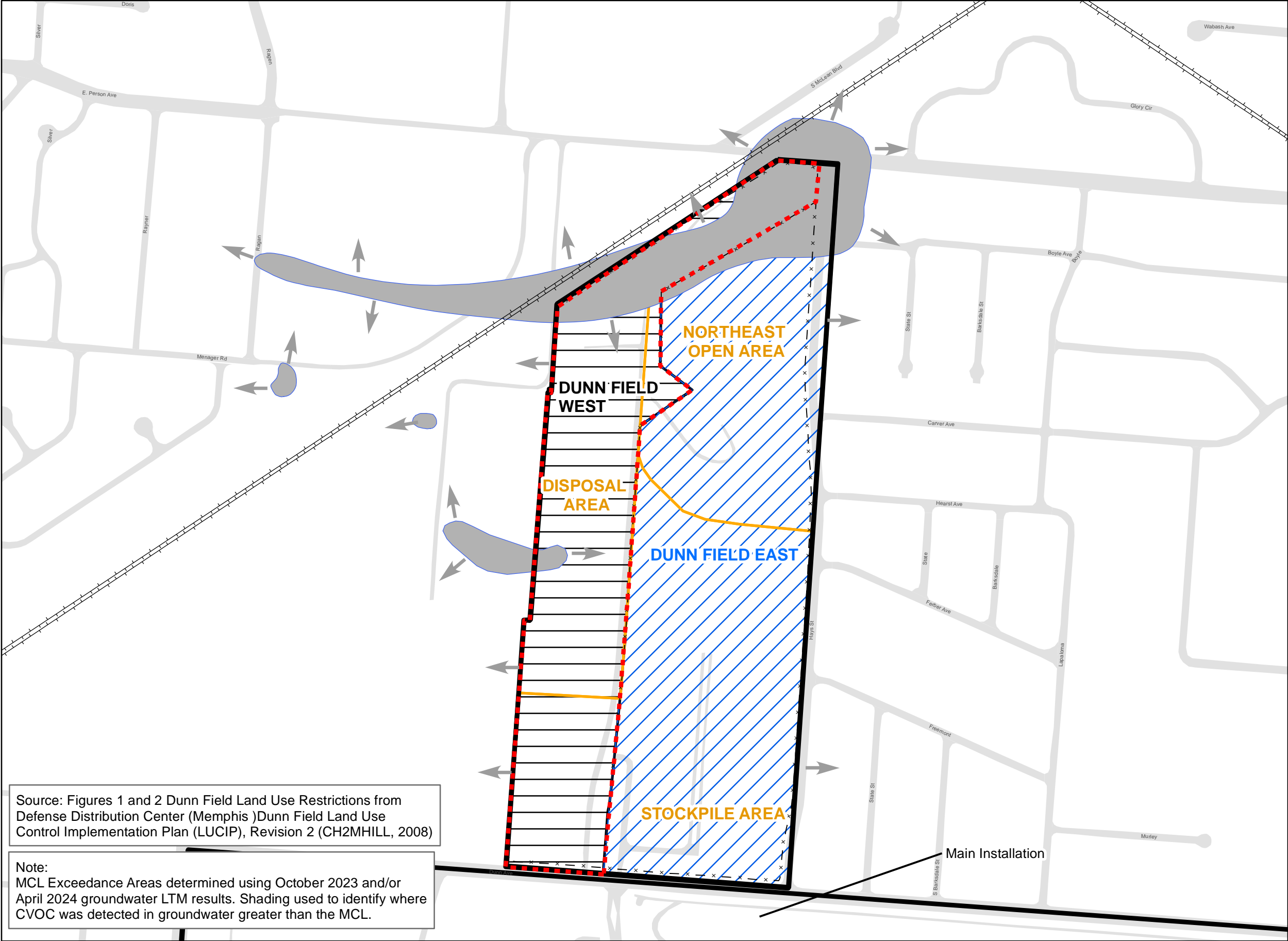
EPA = US Environmental Protection Agency, Region 4

TDEC = Tennessee Department of Environment and Conservation

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

**Figure 2**

**Dunn Field Land and Groundwater Use Restrictions**



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)

Note:  
MCL Exceedance Areas determined using October 2023 and/or April 2024 groundwater LTM results. Shading used to identify where CVOC was detected in groundwater greater than the MCL.

**Figure 2**

**Dunn Field Land and Groundwater Use Restrictions**

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Defense Depot  
Memphis, Tennessee

**Legend**

Railroad

Fence

Fence Required by Dunn Field ROD

Original Property Boundary

Extent of plume based on April 2024 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.

0 250 500  
Feet

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

Date: 6/18/2024  
Edition: Rev 0



## **Appendix A**

### **Responses to Regulatory Agency Comments and Approval Letters**



## **REGION 4**

ATLANTA, GA 30303

**October 11, 2024**

Mr. James Foster  
Department of the Army  
Office of the Deputy Chief of Staff, G9  
Base Realignment and Closure Branch, ISE Division  
600 Army Pentagon  
Washington, DC 20310-0600

Dear Mr. Foster,

The Environmental Protection Agency (EPA/USEPA) completed its regulatory review for the Draft 2024 Annual Site Inspection Report (the Report) for the Defense Depot Memphis, Tennessee (DDMT), submitted by the United States Army (USARMY/ Lead Agency) in August 2024.

The following comments were generated based on a regulatory review of the Report for your attention:

### **GENERAL COMMENTS**

1. The report lacks clarity regarding the implementation of land use controls (LUCs) in off-site areas of Dunn Field West where groundwater contamination exceeds maximum contaminant levels (MCLs). While Figure 2 (Dunn Field Land and Groundwater Use Restrictions) shows off-site plume areas exceeding MCLs, it is unclear whether LUCs are in place to restrict exposure and certain land uses in these areas, specifically to protect against the potential for vapor intrusion. The report mentions a visual inspection of Dunn Field and the off-site property conducted on May 29, 2024; however, it does not specify if this visual observation included the residential homes located west of Dunn Field West. This omission raises concerns about whether potential exposure risks in those residential areas have been adequately assessed.

Additionally, the report states that based on the Shelby County Health Department (SCHD) groundwater well construction code, which prohibits water well construction within one-half mile of the plume boundaries, no active water production wells were identified within this exclusion zone. However, it is unclear whether a thorough visual inspection was

performed within one-half mile of the boundaries of the plumes that included residential homes located off-site and west of Dunn Field West. This lack of information makes it difficult to ascertain whether any potential risks to human health from groundwater exposure or vapor intrusion have been effectively mitigated. It is of interest for the EPA to include specific details about any existing LUCs, monitoring efforts, or community outreach initiatives aimed at informing residents about potential risks. Additionally, the EPA request clarification on whether further assessments or inspections will be conducted in these areas. Please revise the report to discuss how the potential risk of exposure to groundwater and vapor intrusion is being managed in the off-site plume areas west of Dunn Field West, particularly in relation to residential properties.

2. Fencing is a critical LUCs implemented at the Main Installation and Dunn Field/Dunn Field West to restrict public access and prevent unauthorized uses. However, a review of the photographs presented in Appendix B (Site Photographs, May 29, and June 5, 2024) reveals significant concerns regarding the visibility and potential integrity of the fencing due to extensive vegetation overgrowth. Many areas of the site fencing are heavily vegetated, obscuring the fence from view and making it unclear how the structural integrity was determined during the inspection. The size and extent of vegetative overgrowth in and around the fencing could potentially impact its structural integrity and may provide unauthorized access routes over the fence. Specific examples of concern include the photograph titled "Dunn Field east-south fence looking west from Hays Road" (PDF Page 25), which shows the fenced area heavily vegetated with large trees and overhanging limbs, and the photograph titled "Dunn field north fence looking east from top of hill on Dunn Field" (PDF Page 26), where the fencing is almost entirely obscured by vegetation, making it impossible to determine if unauthorized entry access points exist. Please revise the Report to include recommendations for implementing a comprehensive vegetation removal and clearance program for all LUC fencing, establishing a regular maintenance schedule for vegetation control, conducting a thorough inspection of the entire fence line once vegetation is cleared, and including in future annual inspections a specific assessment of vegetation growth along the fence line and its potential impact on the effectiveness of this LUC.
3. The Report states that signage is not a LUC requirement on the fencing; however, based on the results of the Post-Record of Decision (ROD) Supplemental Investigation that was conducted on Dunn Field West the addition of warning signs on fencing should be considered in the vicinity of MW-06 and MW-87. The Post-ROD Supplemental Investigation Report identified areas with volatile organic compound (VOC) concentrations exceeding soil, groundwater, and soil vapor remedial goals (RGs) in the vicinity of Dunn Field West wells MW-06 and MW-87. The current supplemental remedial actions proposed to address the RG exceedances includes excavation, soil vapor extraction (SVE) and LUCs that will be revised to add a deed requirement that vapor intrusion mitigation will be incorporated in construction of new buildings on Dunn Field West. As such, placement of warning signs on fencing in these areas would be beneficial in helping to not only prevent unknowing entry but also for communication of the hazards and restrictions that are in place and providing

contact information for key personnel to ensure that unrestricted access and unacceptable exposure does not occur. Please revise the Report to make a recommendation to place warning signs on the fencing areas of Dunn Field West in the vicinity of MW-06 and MW-8.

## **SPECIFIC COMMENTS**

1. **Defense Depot Memphis, Tennessee, Main Installation, 2024 Annual Site Inspection Report, Page MI-1 and Appendix C, Contact Records, PDF Pages 38 and 40:** The text on Page MI-1 states that Mr. Sean Pedigo was contacted on June 4, 2024 via email and Ms. Warkella Tyson was contacted on June 12, 2024; however, the associated Contact Forms for these individuals in Appendix C (Contact Records) shows that Mr. Pedigo was contacted via email on May 28, 2024 and he responded via email on May 31, 2024. Also, Ms. Tyson was contacted on May 31, 2024 via email and was interviewed on June 4 and 12, 2024. Please revise the Report as necessary to address these discrepancies.
2. **Defense Depot Memphis, Tennessee, Dunn Field, 2024 Annual Site Inspection Report, Page DF-1 and Appendix C, Contact Records, PDF Page 40:** The text on Page DF-1 states that Ms. Warkella Tyson was contacted via email on May 31, 2024 and she responded on June 12, 2024; however, her associated Contact Form Appendix C (Contact Records) shows that correspondence with Ms. Tyson also occurred on June 4, 2024. Please revise the Report as necessary to address this discrepancy.
3. **Table 1, Summary of Land Use Controls and Monitoring Requirements Annual Site Inspection Report Main Installation - Defense Depot Memphis, Tennessee, Page 2 and Table 2, Summary of Land Use Controls and Monitoring Requirements Annual Site Inspection Report Dunn Field - Defense Depot Memphis, Tennessee, Page 2:** The Notes section of Tables 1 and 2 states, "After transfer, the Army may arrange to have TDEC [Tennessee Department of Environment and Conservation], the City of Memphis, or some independent third party representative conduct any required monitoring. [See Section 5 below].;" however, there is no Section 5 contained in the Report. Please revise this statement to remove the reference to Section 5.
4. **Appendix E, Memphis Depot Industrial Park Tenant List and Ownership Map, PDF Pages 47 and 48:** It is unclear where the Alpha Omega housing area is located on the Appendix E figure of tenant locations. The Alpha Omega housing area is mentioned in the Contact Records of Cindy Forsythe, David Dingeldein, Leonard Perkins, and Sean Pedigo and in a photograph included in Appendix B (Site Photographs, May 29 and June 5, 2024); however, the location is not shown on the figure of tenant locations. Furthermore, it is unclear if the owner of this housing development is included in the current tenant list. Please revise the Appendix E tenant list and the Appendix E figure of tenant locations to identify the Alpha Omega housing area.

5. **Appendix F, Water Well Search, Appendix F1, SCHD Well Search Results, PDF Page 52:** The water well search map illustrates a 4-mile radius from the center point of 2163 Airways Blvd. (Barnhart Crane and Rigging); however, the title shown on Appendix F1 states a half-mile radius is shown. Please revise the Appendix F1 figure title to show both the ½ mile and 4-mile radio.

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](mailto: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

**cc:** Jamie A. Woods, TDEC  
William Millar, CALIBRE  
James Ferreira, USEPA, R4  
Kevin Koporec, USEPA, R4  
Shannon Berg, USEPA, R4

**Responses to:**  
**U.S. Environmental Protection Agency (EPA) Region 4 Comments on:**  
**Draft 2024 Annual Site Inspection Report**  
**Defense Depot Memphis, Tennessee**  
**Dated August 2024**  
**Comments Received October 15, 2024**

**General Comments:**

1. The report lacks clarity regarding the implementation of land use controls (LUCs) in off-site areas of Dunn Field West where groundwater contamination exceeds maximum contaminant levels (MCLs). While Figure 2 (Dunn Field Land and Groundwater Use Restrictions) shows off-site plume areas exceeding MCLs, it is unclear whether LUCs are in place to restrict exposure and certain land uses in these areas, specifically to protect against the potential for vapor intrusion. The report mentions a visual inspection of Dunn Field and the off-site property conducted on May 29, 2024; however, it does not specify if this visual observation included the residential homes located west of Dunn Field West. This omission raises concerns about whether potential exposure risks in those residential areas have been adequately assessed.

Additionally, the report states that based on the Shelby County Health Department (SCHD) groundwater well construction code, which prohibits water well construction within one-half mile of the plume boundaries, no active water production wells were identified within this exclusion zone. However, it is unclear whether a thorough visual inspection was performed within one-half mile of the boundaries of the plumes that included residential homes located off-site and west of Dunn Field West. This lack of information makes it difficult to ascertain whether any potential risks to human health from groundwater exposure or vapor intrusion have been effectively mitigated. It is of interest for the EPA to include specific details about any existing LUCs, monitoring efforts, or community outreach initiatives aimed at informing residents about potential risks. Additionally, the EPA request clarification on whether further assessments or inspections will be conducted in these areas. Please revise the report to discuss how the potential risk of exposure to groundwater and vapor intrusion is being managed in the off-site plume areas west of Dunn Field West, particularly in relation to residential properties.

**Response G1:**

The following is a response to the multiple comments raised by General Comment G1:

- **Comment:** While Figure 2 (Dunn Field Land and Groundwater Use Restrictions) shows off-site plume areas exceeding MCLs, it is unclear whether LUCs are in place to restrict exposure and certain land uses in these areas, specifically to protect against the potential for vapor intrusion.
- **Response:** Figure 2 in the subject report identifies areas of Dunn Field where LUCs have been established. DF LUCs only apply to property owned by Army; however, Section 4.01 C of the Rules and Regulations of Wells in Shelby County prohibits the installation of wells within a half-mile of a Superfund Site and associated plumes. A well search by TDEC and the SCHD did not identify water wells within a half-mile of DDMT or associated plumes (Appendix F). Installation of private water wells is not allowed in areas served by Memphis Light Gas and Water, which includes the area surrounding DDMT.

Currently there is no groundwater or soil vapor data to support a complete vapor intrusion pathway west of Dunn Field; however, in September 2024, Army installed and sampled vapor monitoring points west and hydraulically downgradient from Dunn Field to evaluate potential vapor intrusion risk to houses along Rozelle St. EPA is updated monthly on this ongoing vapor intrusion investigation and a report presenting the findings will be submitted to EPA and TDEC in early 2025 after completion of the second soil vapor sampling event.

- **Comment:** The report mentions a visual inspection of Dunn Field and the off-site property conducted on May 29, 2024; however, it does not specify if this visual observation included the residential homes located west of Dunn Field West. This omission raises concerns about whether potential exposure risks in those residential areas have been adequately assessed.

**Responses to:**  
**U.S. Environmental Protection Agency (EPA) Region 4 Comments on:**  
**Draft 2024 Annual Site Inspection Report**  
**Defense Depot Memphis, Tennessee**  
**Dated August 2024**  
**Comments Received October 15, 2024**

- **Response:** Army does not have or intend to pursue access agreements for visual inspection of homes adjacent to Dunn Field. During Long Term Monitoring (LTM) events, observations are made from the public right of way and when accessing LTM wells for water supply wells. Water supply wells have not been identified during LTM events and a statement documenting the visual inspection can be added to the Draft Final 2024 Annual Site Inspection Report. As stated above, a vapor intrusion investigation is being conducted for the Rozelle St. area west of Dunn Field and the results of this investigation will be shared with EPA in early 2025.
  - **Comment:** It is of interest for the EPA to include specific details about any existing LUCs, monitoring efforts, or community outreach initiatives aimed at informing residents about potential risks. Additionally, the EPA requests clarification on whether further assessments or inspections will be conducted in these areas. Please revise the report to discuss how the potential risk of exposure to groundwater and vapor intrusion is being managed in the off-site plume areas west of Dunn Field West, particularly in relation to residential properties.
  - **Response:** Table 2 of the report identifies the Type of Control (e.g. LUC, zoning restriction), the Affected Area, and Monitoring Frequency. Community outreach is conducted by Army in accordance with EPA *Superfund Community Involvement Toolkit* ("CI toolkit") and the approved *2020 Community Involvement Plan*, which include: maintenance of a CIL, prompt response to community questions, EnviroNews distribution to over 4,500 recipients, public notification of five-year reviews, and document uploads to the publicly available information repository. EPA is informed of all community outreach activities and investigation activities during monthly calls; inclusion of this information in the subject report is not warranted.
2. Fencing is a critical LUCs implemented at the Main Installation and Dunn Field/Dunn Field West to restrict public access and prevent unauthorized uses. However, a review of the photographs presented in Appendix B (Site Photographs, May 29, and June 5, 2024) reveals significant concerns regarding the visibility and potential integrity of the fencing due to extensive vegetation overgrowth. Many areas of the site fencing are heavily vegetated, obscuring the fence from view and making it unclear how the structural integrity was determined during the inspection. The size and extent of vegetative overgrowth in and around the fencing could potentially impact its structural integrity and may provide unauthorized access routes over the fence. Specific examples of concern include the photograph titled "Dunn Field east-south fence looking west from Hays Road" (PDF Page 25), which shows the fenced area heavily vegetated with large trees and overhanging limbs, and the photograph titled "Dunn field north fence looking east from top of hill on Dunn Field" (PDF Page 26), where the fencing is almost entirely obscured by vegetation, making it impossible to determine if unauthorized entry access points exist. Please revise the Report to include recommendations for implementing a comprehensive vegetation removal and clearance program for all LUC fencing, establishing a regular maintenance schedule for vegetation control, conducting a thorough inspection of the entire fence line once vegetation is cleared, and including in future annual inspections a specific assessment of vegetation growth along the fence line and its potential impact on the effectiveness of this LUC.

**Response G2:** The Dunn Field Fencing requirement is documented in the September 2008 Land Use Control Implementation Plan (LUCIP) and January 2009 Dunn Field ROD Amendment. These documents require:

- The LUCIP states: Prior to transfer, sale, or lease of the property, the LUCs will include fencing surrounding Dunn Field, both existing and any additional fence added to the site. The fencing will assist the Army in achieving the LUC objectives but may be considered to be non-essential once a new property owner is exercising control over the Property. This determination will be made by the Army, EPA, and TDEC. After transfer, so long as the owner or its tenants occupy the Property on a regular basis, the fencing may be deconstructed without creating an unacceptable risk to human health or the environment.



**Responses to:**  
**U.S. Environmental Protection Agency (EPA) Region 4 Comments on:**  
**Draft 2024 Annual Site Inspection Report**  
**Defense Depot Memphis, Tennessee**  
**Dated August 2024**  
**Comments Received October 15, 2024**

- The ROD Amendment states: Maintenance of fencing around the disposal area during active remediation to protect the public.

The fence around Dunn Field West meets these requirements. The fence is inspected for the subject report and vegetation is frequently cleared; it was last cleared in January 2024 and will be cleared again in December 2024.

3. The Report states that signage is not a LUC requirement on the fencing; however, based on the results of the Post-Record of Decision (ROD) Supplemental Investigation that was conducted on Dunn Field West the addition of warning signs on fencing should be considered in the vicinity of MW-06 and MW-87. The Post-ROD Supplemental Investigation Report identified areas with volatile organic compound (VOC) concentrations exceeding soil, groundwater, and soil vapor remedial goals (RGs) in the vicinity of Dunn Field West wells MW-06 and MW-87. The current supplemental remedial actions proposed to address the RG exceedances includes excavation, soil vapor extraction (SVE) and LUCs that will be revised to add a deed requirement that vapor intrusion mitigation will be incorporated in construction of new buildings on Dunn Field West. As such, placement of warning signs on fencing in these areas would be beneficial in helping to not only prevent unknowing entry but also for communication of the hazards and restrictions that are in place and providing contact information for key personnel to ensure that unrestricted access and unacceptable exposure does not occur. Please revise the Report to make a recommendation to place warning signs on the fencing areas of Dunn Field West in the vicinity of MW-06 and MW-87.

**Response G3:** Army is currently conducting additional investigation at Dunn Field West to collect additional information to support an Explanation of Significant Differences (ESD). If this investigation identifies risk to trespassers, then Army will consider the addition of signs as a deterrent. The ESD may require the modification of ICs as appropriate and are subject to public review.

**Specific Comments:**

1. **Defense Depot Memphis, Tennessee, Main Installation, 2024 Annual Site Inspection Report, Page MI-1 and Appendix C, Contact Records, PDF Pages 38 and 40:** The text on Page MI-1 states that Mr. Sean Pedigo was contacted on June 4, 2024 via email and Ms. Warkella Tyson was contacted on June 12, 2024; however, the associated Contact Forms for these individuals in Appendix C (Contact Records) shows that Mr. Pedigo was contacted via email on May 28, 2024 and he responded via email on May 31, 2024. Also, Ms. Tyson was contacted on May 31, 2024 via email and was interviewed on June 4 and 12, 2024. Please revise the Report as necessary to address these discrepancies.

**Response S1:** The discrepancy was corrected, and additional contact information provided on Page MI-1.

2. **Defense Depot Memphis, Tennessee, Dunn Field, 2024 Annual Site Inspection Report, Page DF-1 and Appendix C, Contact Records, PDF Page 40:** The text on Page DF-1 states that Ms. Warkella Tyson was contacted via email on May 31, 2024 and she responded on June 12, 2024; however, her associated Contact Form Appendix C (Contact Records) shows that correspondence with Ms. Tyson also occurred on June 4, 2024. Please revise the Report as necessary to address this discrepancy

**Response S2:** The discrepancy was corrected, and additional contact information provided on Page DF-1.

3. **Table 1, Summary of Land Use Controls and Monitoring Requirements Annual Site Inspection Report Main Installation - Defense Depot Memphis, Tennessee, Page 2 and Table 2, Summary of Land Use Controls and Monitoring Requirements Annual Site Inspection Report Dunn Field - Defense Depot Memphis, Tennessee, Page 2:** The Notes section of Tables 1 and 2 states, "After transfer, the Army may arrange to have TDEC [Tennessee Department of Environment and Conservation], the City of Memphis, or some independent third party

**Responses to:**  
**U.S. Environmental Protection Agency (EPA) Region 4 Comments on:**  
**Draft 2024 Annual Site Inspection Report**  
**Defense Depot Memphis, Tennessee**  
**Dated August 2024**  
**Comments Received October 15, 2024**

representative conduct any required monitoring. [See Section 5 below].;" however, there is no Section 5 contained in the Report. Please revise this statement to remove the reference to Section 5.

**Response S3:** Tables 1 and 2 were updated and the reference to Section 5 was removed.

4. **Appendix E, Memphis Depot Industrial Park Tenant List and Ownership Map, PDF Pages 47 and 48:** It is unclear where the Alpha Omega housing area is located on the Appendix E figure of tenant locations. The Alpha Omega housing area is mentioned in the Contact Records of Cindy Forsythe, David Dingeldein, Leonard Perkins, and Sean Pedigo and in a photograph included in Appendix B (Site Photographs, May 29 and June 5, 2024); however, the location is not shown on the figure of tenant locations. Furthermore, it is unclear if the owner of this housing development is included in the current tenant list. Please revise the Appendix E tenant list and the Appendix E figure of tenant locations to identify the Alpha Omega housing area.

**Response S4:** The Alpha Omega housing area is located on the parcel east of the Golf Course (Figure 1), within the area available for Unrestricted Use. This property was transferred to Alpha Omega Veterans Services in 2001, is not within the Memphis Depot Industrial Park and therefore not listed on the current tenant list. Figure 1 can be updated to identify the Alpha Omega Housing area, Memphis Police precinct and Barnhart Crane administrative building with the Unrestricted Use area.

5. **Appendix F, Water Well Search, Appendix F1, SCHD Well Search Results, PDF Page 52:** The water well search map illustrates a 4-mile radius from the center point of 2163 Airways Blvd. (Barnhart Crane and Rigging); however, the title shown on Appendix F1 states a half-mile radius is shown. Please revise the Appendix F1 figure title to show both the ½ mile and 4-mile radius.

**Response S5:** Figure F-1 was provided by the SCHD and the title referencing a ½ mile radius appears to be a typographical error. A revised figure was requested from SCHD to correct this error.

Figure F-2, on the following page, presents the ½-mile radius from plume and DDMT boundaries.



## REGION 4

ATLANTA, GA 30303

**January 17, 2025**

Mr. James Foster  
Department of the Army  
Office of the Deputy Chief of Staff, G9  
Base Realignment and Closure Branch, ISE Division  
600 Army Pentagon  
Washington, DC 20310-0600

Dear Mr. Foster,

The U.S. Environmental Protection Agency (EPA) has completed its review of the responses to regulatory comments regarding the 2024 Annual Site Inspection Report for the Defense Depot Memphis, Tennessee (DDMT) site, submitted by the United States Army (Army, lead agency). This review is conducted to ensure that the responses adequately address the concerns raised about the status and effectiveness of institutional controls and site-wide conditions at both the Main Installation and Dunn Field areas.

The EPA appreciates the lead agency for preparing the responses to regulatory comments. However, after careful examination, we have identified several areas where further clarification or additional information is needed. Our specific comments are as follows:

### **General Comments:**

- 1. Comment for Response G1:** The response does not fully address how potential risks from groundwater exposure and vapor intrusion are being managed in off-site plume areas west of Dunn Field West, especially for residential properties. Please provide more details on any monitoring or risk management activities conducted in these areas during the reporting period.
- 2. Comment for Response G2:** While the response mentions periodic clearing of vegetation, it does not provide specific details on the frequency and extent of vegetation control along the fence line. Please clarify the vegetation management schedule and how fence integrity was verified during this reporting period, particularly in heavily vegetated areas.

**3. Comment for Response G3:** The response defers consideration of warning signs pending further investigation. Given the known VOC concentrations exceeding RGs near MW-06 and MW-87, please explain how the absence of warning signs was evaluated in terms of LUC effectiveness during this reporting period.

**Specific Comments:**

**1. Comment for Response S4:** Please confirm that Figure 1 will be updated to identify the Alpha Omega Housing area, Memphis Police precinct, and Barnhart Crane administrative building within the Unrestricted Use area, as suggested in your response.

**2. Comment for Response S5:** Please provide an update on the status of obtaining the revised Figure F-1 from SCHD to correct the typographical error in the radius description.

It is crucial that all regulatory concerns are effectively resolved to ensure ongoing protection of human health and the environment at the DDMT site. By doing so, we can ensure a comprehensive understanding of the issue and implement targeted solutions that will continue safeguard our community and natural resources. Thank you for your attention to this important matter.

The EPA commends the Army 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](mailto: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

**cc:** Jamie A. Woods, TDEC  
James Ferreira, USEPA, R4  
Kevin Koporec, USEPA, R4  
Shannon Berg, USEPA, R4

**Responses to:  
U.S. Environmental Protection Agency (EPA) Region 4 Comments on:  
Draft 2024 Annual Site Inspection Report Response to Comments  
Defense Depot Memphis, Tennessee  
Dated December 2, 2024  
Comments Received January 17, 2025**

**General Comments:**

**Comment G1:** The response does not fully address how potential risks from groundwater exposure and vapor intrusion are being managed in off-site plume areas west of Dunn Field West, especially for residential properties. Please provide more details on any monitoring or risk management activities conducted in these areas during the reporting period.

**Response G1:** The Land Use Control (LUC) inspection and subject report are conducted in accordance with the Land Use Control Implementation Plan (LUCIP) (CH2MHILL, 2008) as part of the ongoing remedy for Dunn Field. The purpose of this report is to verify compliance with the LUC objectives outlined in the Record of Decision (ROD). These objectives include ensuring that institutional controls, such as deed restrictions, zoning limitations, groundwater use prohibitions, and access restrictions, are effectively implemented and maintained. The scope of the LUC inspection focuses on confirming that no unauthorized activities—such as the installation of groundwater wells or residential development—occur within the restricted areas and that these controls remain protective of human health and the environment.

Details on how potential risks from groundwater exposure and vapor intrusion are being managed in off-site plume areas, including residential properties west of Dunn Field, are beyond the scope of the LUC inspection and report. Such information is more appropriately addressed in the Five-Year Review process as required under CERCLA Section 121(c). The Five-Year Review evaluates the long-term effectiveness and protectiveness of the remedy, including detailed updates on monitoring results, plume behavior, and any risk management activities undertaken during the review period.

Army is currently conducting a vapor intrusion investigation in the residential area west of Dunn Field. The initial round of soil vapor samples found VOC concentrations are below VISLs in the offsite area. The second round of soil vapor sampling was completed in January 2025 and a report documenting potential vapor intrusion risk will be submitted to EPA in early 2025. This information will be used to update the protectiveness determination in the Fifth Five Year Review as documented in biennial update letters (Department of Army, 2024) and monthly Site Management Team (SMT) meetings.

**Comment G2:** While the response mentions periodic clearing of vegetation, it does not provide specific details on the frequency and extent of vegetation control along the fence line. Please clarify the vegetation management schedule and how fence integrity was verified during this reporting period, particularly in heavily vegetated areas.

**Response G2:** Army has requested that EPA's legal department review fencing and signage requirements and discuss with the Army's legal department to determine a path forward. To address this comment, Army will update the 2024 LUC Inspection Report to document the fence maintenance activities listed below:

- In 2023 damage to the fence was identified by Army at 12 locations. In January and February 2024, Army repaired the fence as documented in the attached photolog.
- In December 2024, vegetation was removed from the Dunn Field fence. A summary of the vegetation removal was submitted to EPA on January 16, 2025. During the December 2024 vegetation removal and subsequent inspection, damage to the fence was identified at several areas as documented in the attached summary. Army will perform fence repairs, which will be documented in the 2025 LUC Inspection Report.

**Comment G3:** The response defers consideration of warning signs pending further investigation. Given the known VOC concentrations exceeding RGs near MW-06 and MW-87, please explain how the absence of warning signs was evaluated in terms of LUC effectiveness during this reporting period.

**Response G3:** The comment refers to comment G3 in the December 2024 RTCs. Warning signs are not a Land Use Control (LUC) requirement under the Land Use Control Implementation Plan (LUCIP) (CH2MHILL, 2008); therefore, their absence was not evaluated during the reporting period. The purpose of the annual LUC inspection is to verify that the LUCs outlined in the Record of Decision (ROD) are being followed, including restrictions on groundwater use and residential development.

As stated in Response G2, the need for signage should be discussed by EPA and Army legal departments. Army is currently investigating Dunn Field West to support an Explanation of Significant Differences (ESD). The ESD, which will address potential updates to the LUCs, is planned for submission in March 2025. Changes to LUCs, such as adding signage, can be added to the ESD, if needed.

### **Specific Comments**

**Comment S1:** Please confirm that Figure 1 will be updated to identify the Alpha Omega Housing area, Memphis Police precinct, and Barnhart Crane administrative building within the Unrestricted Use area, as suggested in your response.

#### **Response S1:**

Updated Figure 1 is attached.

**Comment S2:** Please provide an update on the status of obtaining the revised Figure F-1 from SCHD to correct the typographical error in the radius description.

#### **Response S2:**

Updated Figure F-1 is attached.

### **References**

CH2MHILL, 2008. *Off-Depot Groundwater Final Remedial Design (Rev. 1), Appendix A – Land Use Control Implementation Plan*, September

Department of Army, 2024. Third Biannual Update to the Fifth Five-Year Review, Defense Depot Memphis, Tennessee prior to Addendum. August 15

**From:** [Martinez-Torres, Fernando](#)  
**To:** [Millar, William W Sr CTR USARMY HQDA DCS G-9 \(USA\)](#); [Jamie Woods](#); [Ferreira, James](#); [Koporec, Kevin](#); [Berg, Shannon](#); [McRae, Mac](#)  
**Cc:** [Foster, James C CIV USARMY HQDA DCS G-9 \(USA\)](#); [Melissa L Shirley](#); [Chase E Carter](#); [Holmes, Thomas C](#); [Mokri, Clayton R](#); [Larry Pannell](#); [Brett Anchukaitis](#)  
**Subject:** RE: DDMT 2024 Annual Site Inspection RTCs  
**Date:** Thursday, March 13, 2025 4:02:13 PM

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**CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Good evening, James,

The EPA approves the responses to its comments on the DDMT 2024 Annual Site Inspection Report, dated February 20, 2025. Please submit the draft final version of the Report to the Regulators for final review and approval. Thank you for your continuous support.

Sincerely,

Fernando Martinez Torres  
U.S. Environmental Protection Agency/R4  
Federal Facilities Branch  
Department of Defense Section  
404-695-4991

*You are the driving force behind our ability to achieve our objectives of safeguarding the environment, protecting life, and ensuring a sustainable future.*

---

**From:** Millar, William W Sr CTR USARMY HQDA DCS G-9 (USA) <william.w.millar.ctr@army.mil>  
**Sent:** Thursday, February 20, 2025 10:57 AM  
**To:** Martinez-Torres, Fernando <martinez-torres.fernando@epa.gov>; Jamie Woods (Jamie.Woods@tn.gov) <Jamie.Woods@tn.gov>; Ferreira, James <Ferreira.James@epa.gov>; Koporec, Kevin <Koporec.Kevin@epa.gov>; Berg, Shannon <Berg.Shannon@epa.gov>; McRae, Mac <mac.mcrae@techlawinc.com>  
**Cc:** Foster, James C CIV USARMY HQDA DCS G-9 (USA) <james.c.foster10.civ@army.mil>; Shirley, Melissa L CIV USARMY CESAM (USA) <Melissa.L.Shirley@usace.army.mil>; Carter, Chase E CIV USARMY CESAM (USA) <chase.e.carter@usace.army.mil>; Holmes, Thomas C <Thomas.Holmes@hdrinc.com>; Mokri, Clayton R <clayton.mokri@hdrinc.com>; Larry Pannell <lpannell@komangs.com>; Brett Anchukaitis <BAnchukaitis@komangs.com>  
**Subject:** DDMT 2024 Annual Site Inspection RTCs

All,

Attached are the RTC and documents needed to review the RTCs on the 2024 Annual Site Inspection Report.



Thanks.

Bill Millar  
CALIBRE  
703-819-0100



**REGION 4**

ATLANTA, GA 30303

**March 26, 2025**

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) has completed its regulatory review and subsequently approves the Draft Final 2024 Annual Site Inspection Report for the Defense Depot Memphis, Tennessee (DDMT), submitted by the United States Army (USARMY/Lead Agency) on March 26, 2025. Please ensure that this document, along with all supporting documentation, are incorporated into the Final version of the Report and submitted to the regulators for final approval.

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](mailto: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

cc: Jamie A. Woods, TDEC  
William Millar, CALIBRE  
James Ferreira, USEPA, R4  
Kevin Koporec, USEPA, R4

## **Appendix B**

### **Site Photographs, May 29 and June 5, 2024**



Golf course southern fence looking west on Ball Road.



Golf course west fence on Alpha Omega housing area looking north.





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



Golf course west fence looking south where west fence joins south fence.



Dunn Field south fence and gate looking northwest from Dunn Avenue.



Dunn Field south fence looking west from gate on Dunn Avenue.





Dunn Field east fence looking south towards main gate.



Dunn Field east at corner of east-south fence looking east from Dunn Field road.





Dunn Field east-south fence looking east at Hays Road.



Dunn Field east-south fence looking west from Hays Road.





Dunn Field east fence along Hays Road looking north towards S. Person Avenue.



Dunn Field north fence looking east from top of hill on Dunn Field.





Dunn Field north fence connecting with west fence looking west from Dunn Field road.



Dunn Field north fence looking west from S. Person Avenue.



Dunn Field west fence looking north from west gate.



Dunn Field west gate looking west.





Dunn Field west fence midway between west gate and south fence looking south

## **Appendix C**

### **Contact Records**

# Contact Record

Date:	Tuesday, June 04, 2024		
Project:	DDMT Annual Site Inspection 2024	Project No:	10351615 003A
Contacted:	Cindy Forsythe, Colliers Management Services – Memphis LLC	Email:	Cindy.forsythe@colliers.com
		Phone No:	901-942-4939
By:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2024		

## Discussion, Agreement, and/or Action:

I contacted Ms. Cindy Forsythe of Colliers Management Services – Memphis LLC via email on May 28, 2024, requesting that she provide a current tenant list and Memphis Depot Industrial Park (MDIP) property ownership map for use in the Annual Site Inspection and requesting confirmation of information and answers to questions listed below. Ms. Forsythe emailed the tenant list and map and responded to the information request on May 31, 2024.

Ms. Forsythe confirmed that Colliers manages approximately 356.1 acres of property at the MDIP owned by Memphis Depot TIC LLC, DP 107 LLC, Memphis Depot Land LLC, and Depot Owners Association LLC. The property contains approximately 4 million square feet of buildings. The Depot Owners Association owns approximately 35.6 acres containing the Memphis Depot Parkway, W. Freeman Drive, Heyde Avenue, and two storm water retention ponds. There are no structures on the Depot Owners Association LLC property, except for three guardhouses and only one is currently in use.

The email 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 unrestricted use in the parcels along the eastern boundary (Barnhart Crane administrative building, Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on the 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.

The email contained the following questions. Ms. Forsythe's responses are shown after the question.

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

Do leases issued since July 2023 include the Land Use Controls and Environmental Protection Provisions? Ms. Forsythe: Yes

Are your lessees aware of the Land Use Controls? Ms. Forsythe: Yes.

Is the property owned by Memphis Depot TIC LLC, DP 107 LLC, Memphis Depot Land LLC, and Depot Owners Association LLC used for only light industrial purposes with no residential or childcare facilities? Ms. Forsythe: Yes.

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. Forsythe: No.

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

Prepared by:

Denise K. Cooper

HDR EOC

Senior Environmental Analyst

# Contact Record

Date:	Friday, June 14, 2024		
Project:	DDMT Annual Site Inspection 2024	Project No:	10351615 003A
Call to:	David Dingeldein, 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 2024		

## Discussion, Agreement, and/or Action:

I contacted Mr. David Dingeldein, Barnhart Crane Yard Manager, via email on May 28, 2024. He responded on June 7, 2024. He confirmed that 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. Since July 2023, Barnhart entered into a verbal agreement allowing Shoaf Motor Sales to store automobiles on a portion of Barnhart property (see attached). Mr. Dingeldein indicated Shoaf operations comply with LUC restrictions.

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

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unrestricted use in the parcels along the eastern boundary (Barnhart Crane administrative building, Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on the 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.

The email included the following questions. Mr. Dingeldein's responses are shown after the questions.

Do you understand that these LUCs apply to all the former Memphis Depot property owned by Barnhart, except for unrestricted use in the parcels along the eastern boundary (Barnhart Crane administrative building, Memphis Police Department precinct, and Alpha Omega housing area)?  
Mr. Dingeldein: Yes.

Do leases issued since July 2023 include the LUCs and Environmental Protection Provisions?  
Mr. Dingeldein: Yes.



Is the property owned by Barnhart used for only light industrial purposes with no residential or childcare facilities? Mr. Dingeldein: Yes.

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. Dingeldein: No.

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

Prepared by:

Denise K. Cooper

HDR EOC

Senior Environmental Analyst



Willie F. Brooks, Jr.  
Shelby County Register of Deeds

Owner: BARNHART CRANE AND RIGGING CO  
Parcel Address: 0 DUNN AVE  
Parcel ID: 060092 00039  
2024 Appraisal: \$626,000  
Tax District: MEMPHIS  
Year Built:  
Lot Number:  
Subdivision: MEMPHIS DEPOT BUSINESS PARK  
2ND AMENDED  
Plat BK & PG: 247-042  
Dimensions:  
Total Acres: 25.342  
Owner Address: 1701 DUNN ST  
MEMPHIS TN  
38106 7357

Map prepared on 6/14/2024



# Contact Record

Date: Friday, June 14, 2024

Project:	DDMT Annual Site Inspection 2024	Project No:	10351615 003A
To:	Sean Pedigo, Yard Manager, Supply Chain Solutions	Email:	spedigo@supplychainsolutionsllc.com
		Phone No:	901-496-8433
From:	Denise Cooper, HDR	Phone No:	901-268-2478
Subject:	DDMT Annual Site Inspection 2024		

## Discussion, Agreement, and/or Action:

I emailed Mr. Sean Pedigo, Yard Manager, on May 28, 2024. 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 below and requested responses to the questions below.

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unrestricted use in the parcels along the eastern boundary (Barnhart Crane administrative building, Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on the 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.

The email also included the questions below. Mr. Pedigo responded via email on May 31, 2024. He confirmed that Supply Chain Solutions owns 8.2 acres including Building 770 and the surrounding property.

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 2023 include the LUCs and EPPs? Mr. Pedigo: Unsure; must confirm with owner who is currently out of the country. (On July 14, 2024, Denise Cooper searched the Shelby County Register of Deeds and found no new deeds/leases filed for SCS property at the former Memphis Depot since July 2023.)

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.

Residential and childcare restrictions 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. No parts of SCS property are used for residential or child-occupied facilities, including day-care operations.

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 EOC

Senior Environmental Analyst

# Contact Record

Date:	Tuesday, June 04, 2024		
Project:	DDMT Annual Site Inspection 2024	Project No:	10351615 003A
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 2024		

## Discussion, Agreement, and/or Action:

I contacted Reverend Leonard Perkins, President of Vietnam Veterans Association (VVA) Chapter 1113 and manager of the golf course, via email on May 28, 2024, providing the information and asking the questions below. VVA1113 leases the 46.7-acre golf course area at the former Memphis Depot from the City of Memphis. Rev. Perkins responded to the email on June 1, 2024.

The email explained the purpose of the annual inspection and described the following LUCs at the Main Installation and one specific to the golf course.

- 1) Former Memphis Depot property will be used only for light industrial purposes, except for unrestricted use in the parcels along the eastern boundary (Barnhart Crane administrative building, Memphis Police Department precinct, and Alpha Omega housing area) and recreational use on the 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.

The email included the following questions. Rev. Perkin's responses are shown after the questions.

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

Is VVA1113 using the property for any other purpose than recreation? Rev. Perkins: The property is used only for recreational purposes. The office and golf cart maintenance buildings on the property support the recreational activities.

Is the property being used for residential or childcare purposes? Rev. Perkins: No, however VA1113 has a youth golf program from 8 a.m. until 3 p.m. Monday through Friday starting in June until mid-July for children ages 6 to 18.

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

Does VVA maintain the golf course fence? Rev. Perkins: Yes. No major repairs since July 2023.

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

Prepared by:  
Denise K. Cooper  
HDR EOC  
Senior Environmental Analyst

# Contact Record

Date: Friday, June 14, 2024

Project:	DDMT Annual Site Inspection 2024	Project No:	10351615 003A
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 2024		

## Discussion, Agreement, and/or Action:

I emailed Ms. Warkella Tyson on May 31, 2024, and spoke with her on June 4 and 12, 2024. Ms. Tyson is the Supervisor for the Shelby County Health Department (SCHD), Pollution Control Division, Water Quality Branch and Septic Tank Program. The Water Quality Branch manages permitting for the construction of groundwater wells within Memphis and Shelby County.

In the email, I explained 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 and described the following Land Use Controls (LUCs) in place at the former Memphis Depot.

- 1) No production/consumptive use of groundwater or drilling groundwater wells on the MI or Dunn Field.

The email also included the questions below and a request for information regarding groundwater well permits issued within ½-mile of the former Memphis Depot property boundary and regarding five wells identified on a Tennessee Department of Environment and Conservation (TDEC) public water well figure within ½-mile of the former Memphis Depot property boundary.

On June 12, 2024, Ms. Tyson spoke with and emailed me stating that ongoing SCHD data migration to a new system meant her office was unable to create a new figure showing permitted wells within a 4-mile radius centered on 1740 Dunn Avenue. She confirmed her office had issued no new permits for groundwater wells within the 4-mile radius of 1740 Dunn Avenue since July 2023. On June 27 and June 28, 2024, SCHD provided information on wells identified on the TDEC public water well figure.

Are you aware of the groundwater LUC in place at the former Memphis Depot? Ms. Tyson: Yes.

Have the groundwater well installation permit regulations and process changed since July 2023? Ms. Tyson: No. 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 consumptive use wells within a half-mile of the designated boundaries of a listed federal Superfund site, including all areas with groundwater

contamination. The groundwater well permit search results showed no new permits issued from July 2023 through June 2024.

Does the Water Quality Branch enforce the well installation regulations and processes to ensure installation of non-permitted wells? Ms. Tyson: Yes, with the power to cancel drillers' licenses if they install non-permitted wells. 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.

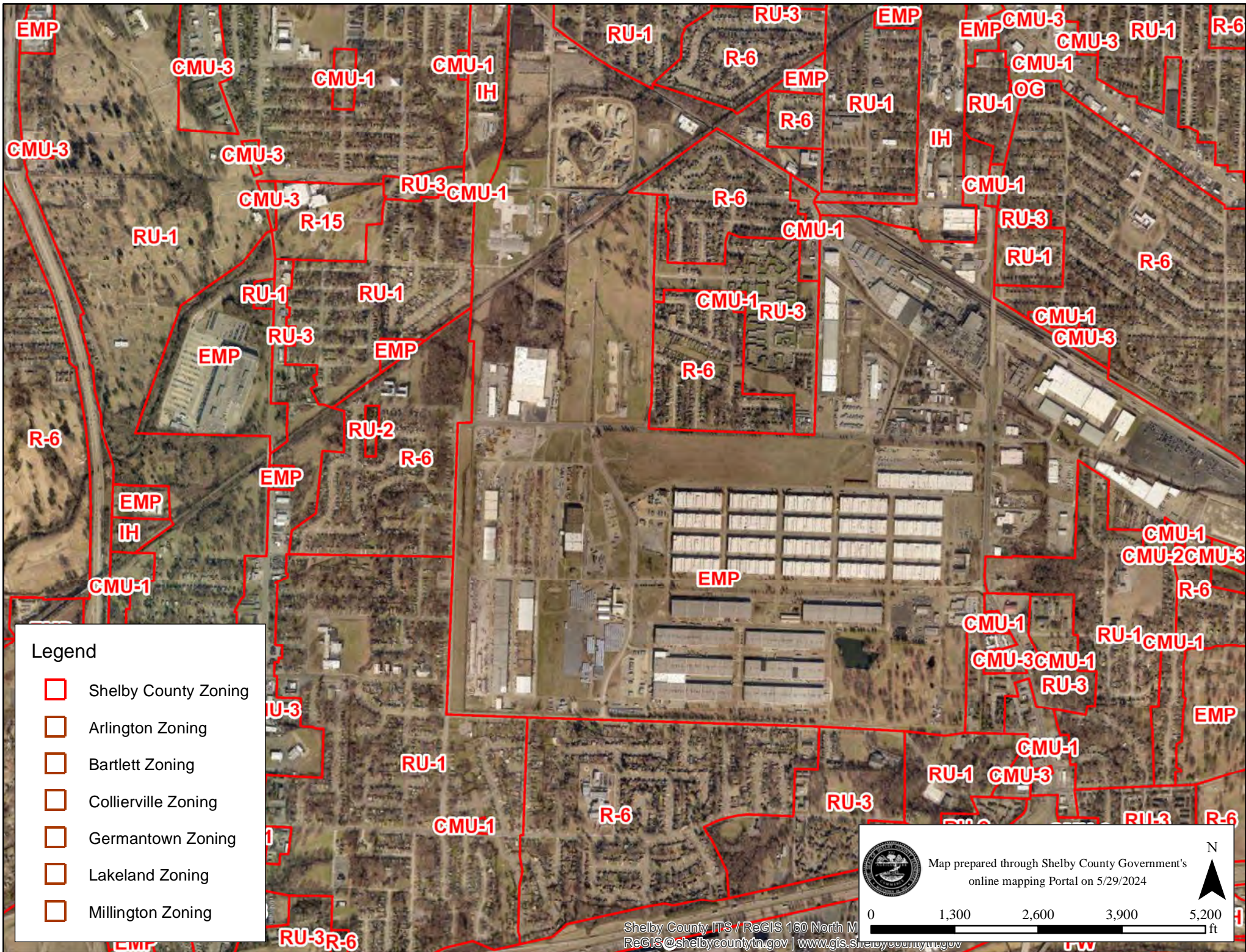
Prepared by:  
Denise K. Cooper  
HDR EOC  
Senior Environmental Analyst



## **Appendix D**

### **Zoning and Land Use Maps**





### Legend

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



Map prepared through Shelby County Government's  
online mapping Portal on 5/29/2024

0 1,300 2,600 3,900 5,200  
ft







## Legend



Parcels

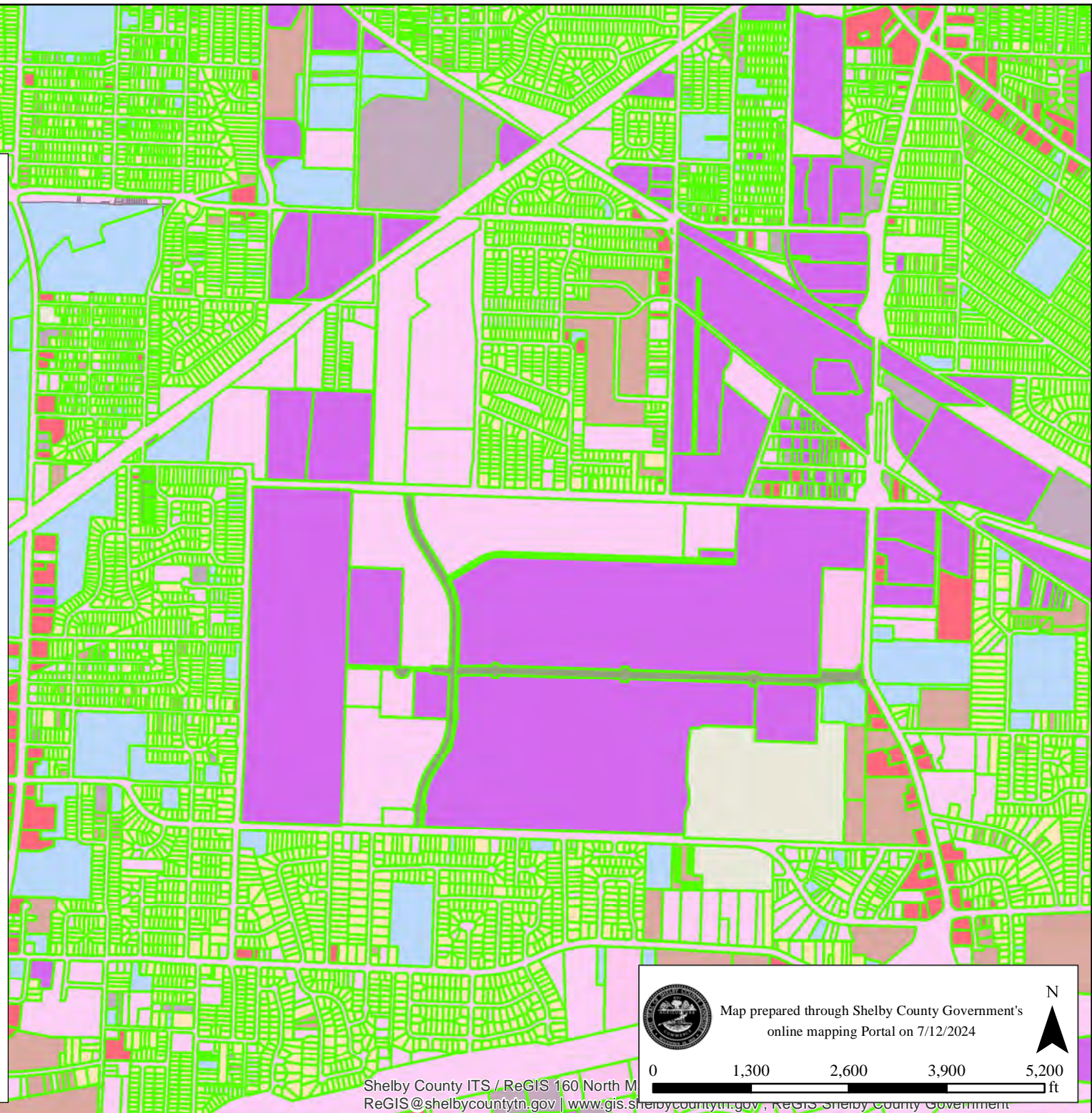
## Land Use

- 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 7/12/2024



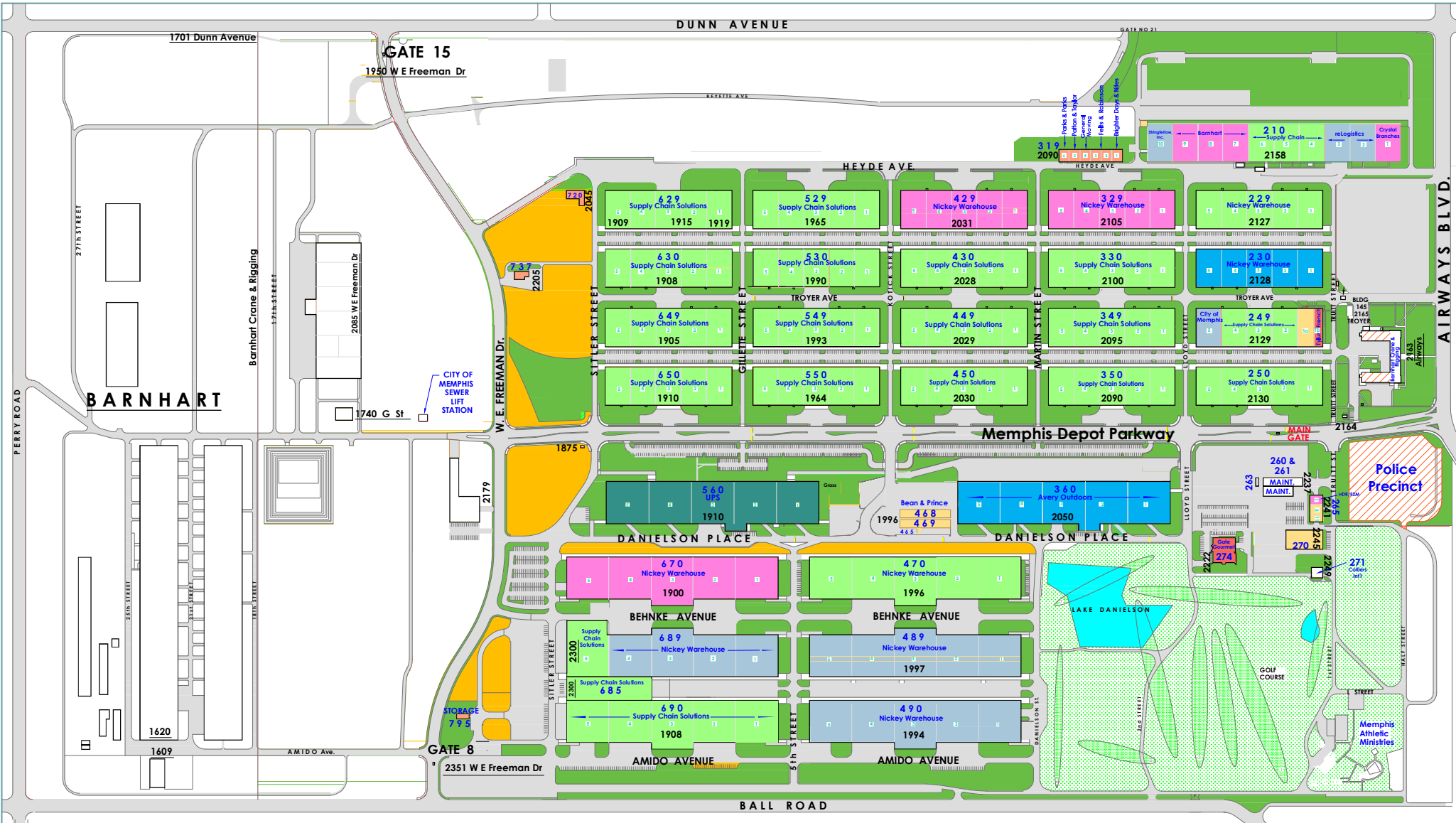
0 1,300 2,600 3,900 5,200  
ft

## **Appendix E**

### **Memphis Depot Industrial Park Tenant List and Ownership Map**

Building/Bays	Tenant	Address	Square Feet
210-Bay 1	Champion Online/Crystal	2158 Heyde	22,037
210-Bays 2,3	reLogistics Services	2158 Heyde	43,933
210-Bays 4,5,6	Supply Chain	2158 Heyde	65,901
210-Bays 7,8,9	Barnhart	2158 Heyde	43,920
210-Bay 10	Stringfellow	2158 Heyde	22,037
229	Nickey Warehouse	2127 Heyde	109,994
230	Nickey Warehouse	2128 Troyer	109,994
249-Bay 1a	Tylur French/Youngblood	2129 Troyer	7,000
249-Bay 1b	<b>Vacant</b>	2129 Troyer	14,837
249-Bays 2,3,4	Supply Chain	2129 Troyer	66,000
249-Bay 5	City of Memphis	2129 Troyer	22,037
250	Supply Chain	2130 Memphis Depot Pkwy	110,010
260, 261	Maintenance Shop	2237 Truitt	11,838
265-Bays 1,2,10	HDR Engineering	2241 Truitt	3,926
265-Bays 3,4,5,6,7,8,9	<b>Vacant</b>	2241 Truitt	3,957
270	<b>Vacant</b>	2245 Truitt	14,080
271	Management Office	2249 Truitt	1,530
274	Gate Gourmet	2222 Lloyd	14,186
319-Bay 1	Brighter Days & Nites	2090 Heyde	1,500
319-Bays 2,3	Linda Felts and Ken Robison	2090 Heyde	4,500
319-Bay 4	General Moving	2090 Heyde	4,000
319-Bay 5	Parks & Parks	2090 Heyde	3,000
319-Bay 6	Patton & Taylor	2090 Heyde	3,000
329	Nickey Warehouse	2105 Heyde	109,994
330	Supply Chain	2100 Troyer	109,994
349	Supply Chain	2095 Troyer	109,994
350	Supply Chain	2090 Memphis Depot Pkwy	109,994
360	Banded Holdings/Avery Outdoors	2050 Danielson Place	207,963
429	Nickey Warehouse	2031 Heyde	109,994
430	Supply Chain	2028 Troyer	109,994
449	Supply Chain	2029 Troyer	109,994
450	Supply Chain	2030 Memphis Depot Pkwy	109,994
465, 468, 469	<b>Vacant</b>	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 Pkwy	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 Pkwy	109,994
670	Nickey Warehouse	1900 Danielson Place	208,010
685	Supply Chain	2300 Sitler	45,942
689-Bays 1,2,3,4	Nickey Warehouse	2300 Sitler	167,839
689-Bay 5	Supply Chain	2300 Sitler	48,696
690-Bays 1,2,3,4	Supply Chain	1908 Amido	166,456
690-Bay 5	Supply Chain	1908 Amido	40,200
720	General Moving	2045 Sitler	4,665
737	M & W Transportation	2205 Sitler	1,198
795	<b>Vacant - Dispatch Office</b>	2351 WE Freeman	600
			<b>4,204,811</b>





## Memphis Depot Industrial Park

### Tenant Locations

#### LEGEND

VACANT MTM 2024 2025 2026 2027 2028 2029 2030 2031 FACILITIES

DATE 12/06/2023



scale 0 100' 200' 400' 600'  
1" = 200'

## **Appendix F**

### **Water Well Search**



## Water Well Search

Shelby County Health Department (SCHD) and Tennessee Department of Environment and Conservation (TDEC) were contacted to identify whether active groundwater production wells are present within one-half mile of the property boundaries of the Main Installation (MI) or Dunn Field.

On May 31, 2024, Army requested a records search for well construction permits within a 4-mile radius of DDMT issued since July 2023. On June 12, 2024, Ms. Tyson confirmed that her office had issued no new groundwater well construction permits and provided the July 2021 figure showing water well locations within a 4-mile radius of a central location on DDMT ([Attachment F-1](#)).

On May 29, 2024, the geospatial coordinates for the DDMT property boundary and adjacent groundwater plume were uploaded to the TDEC Water Well Map Viewer. The TDEC Private Water Well Screening Report ([Attachment F-2](#)) identified five wells located within the 0.5-mile exclusion zone. The report included a table with well coordinates and limited well data and links to driller reports, which are provided ([Attachment F-3](#)). The well locations with the property boundary and 0.5-mile extent are shown on an aerial photograph ([Attachment F-4](#)).

On June 19, 2024, Army contacted Mr. Richard Rogers with the TDEC Water Well Program to inquire if additional information, other than that provided on the TDEC Water Well Screening Report, was available for review. Mr. Rogers stated that TDEC Water Well Program has no other information and suggested that Army contact SCHD.

On June 20, 2024, SCHD was contacted for information on the status of the five wells within one-half mile of DDMT identified by TDEC. SCHD did not have well driller logs or construction details, but SCHD staff searched their files and aerial photography ([Attachment F-5](#)) of the locations. Well information and the reported status are provided below.

Figure ID	TDEC Well ID	Address	Date Installed	Total Depth (ft bgs)	Status
1	15709010	1870 Airways	NR	371	The TDEC GPS location is under the current building location at this industrial site.
2	15709011	1870 Airways	NR	386	A well is not noticeable at the TDEC GPS location, which is in the Airways Blvd right of way.
3	15709014	2367 Kimball	NR	380	Wells are not noticeable at the two TDEC GPS locations at this industrial site.
4	15709015	2367 Kimball	3/6/1947	390	
5	15709033	2166/8 Frisco	NR	389	Documentation at SCHD shows this well was filled and abandoned on 09-04-1992.

Notes: NR = not recorded

ft bgs = feet below ground surface

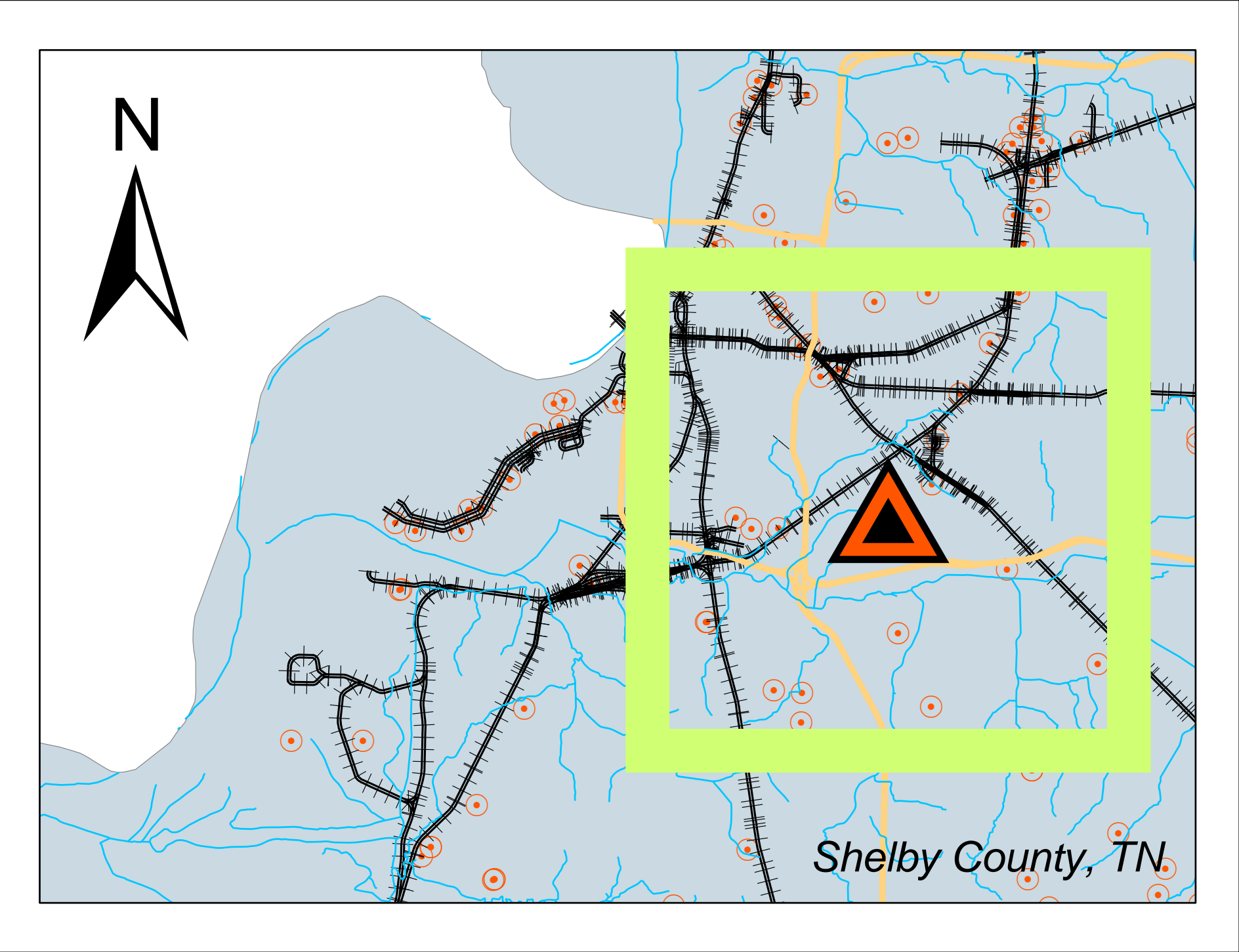
Status = Operational status of the well as stated by SCHD in emails received on June 27 and 28, 2024



# SHELBY COUNTY HEALTH DEPARTMENT

Pollution Control / Water Quality Branch

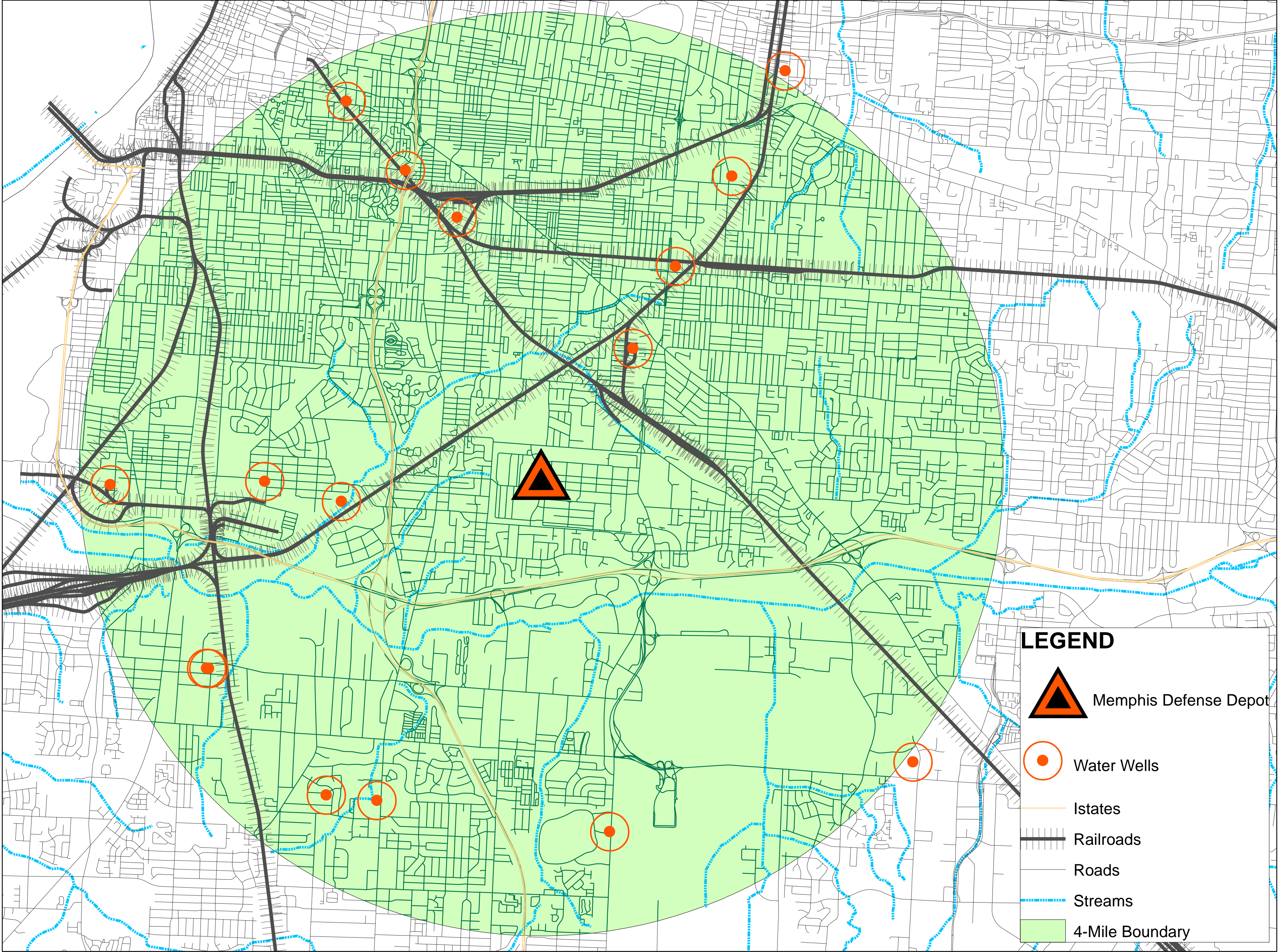
*Dunn Field - Memphis Denfense Depot*



## 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**



### Area of Interest (AOI) Information

May 29 2024 11:44:29 Pacific Daylight Time



## Summary

Name	Count	Area(acres)	Length(mi)
WLTS Well Locations [PUBLIC]	5	N/A	N/A

## WLTS Well Locations [PUBLIC]

#	WELL_NUMB R	DRILLER_TA G_NUMBR	INSPECTION _TAG_NUMB R	CMPLTN_DA TE	CMPLTN_TO TAL_DEPTH	FINISH_TYPE	FINISH_FRO M_FT	FINISH_TO_F T
1	15709010	----	----	----	371	----	311	371.00
2	15709011	----	----	----	386	----	336	386.00
3	15709014	----	----	----	380	----	330	380.00
4	15709015	----	----	3/5/1947	390	----	----	----
5	15709033	----	----	----	389	----	----	----

#	CMPLTN_ES TIMATED_YI ELD	CMPLTN_ST ATIC_LEVEL	QUALITY	CASING_TYP E	CASING_FEE T_BELOW_G ROUND	QUAD_NAME	QUAD_NUMB R	QUAD_NTH
1	500.00	65	----	----	----	SOUTHEAST- MEMPHIS	0409SW	----
2	----	76	Good	----	----	SOUTHEAST- MEMPHIS	0409SW	----
3	----	118	----	Steel	330	SOUTHEAST- MEMPHIS	0409SW	----
4	----	107	Good	----	----	SOUTHEAST- MEMPHIS	0409SW	----
5	----	100	Good	----	----	SOUTHEAST- MEMPHIS	0409SW	----

#	LATITUDE_D D	LONGITUDE_ DD	COUNTY_NA ME	OWNER_NA ME	LOCATION	INSPECTION _DATE	LICENSE_CO DE	ACCURACY
1	35.09417	-89.98611	SHELBY	----	----	----	740	S
2	35.09389	-89.98722	SHELBY	----	----	----	740	S
3	35.09472	-89.98278	SHELBY	----	----	----	740	S
4	35.09444	-89.98278	SHELBY	----	----	----	740	S
5	35.09583	-89.99000	SHELBY	----	----	----	740	S

#	WELL_USE	FORM_LOG	Potential Orphan Well:	Driller Report Link	Count
1	Industrial	N	----	<a href="https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709010">https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709010</a>	1
2	Industrial	N	----	<a href="https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709011">https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709011</a>	1
3	Other	N	----	<a href="https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709014">https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709014</a>	1
4	Industrial	N	----	<a href="https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709015">https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709015</a>	1
5	Industrial	N	----	<a href="https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709033">https://dataviewers.tdec.tn.gov/dataviewers/f?p=2005:39930:::P39930_WELL_REPORT_NU_MBER:15709033</a>	1

### **Well Data Disclaimer:**

These data should not be used as an endpoint for decision making purposes in instances such as spill response or the locating of a well in proximity to other features (e.g., property lines, septic systems, buildings etc.). All well locations should be field verified by the user before decisions are made.

There may be records in the State's water well database that do not contain reliable locational information, specifically with respect to the reported latitude and longitude. The database includes entries reported as far back as the 1920s and the accuracy of locational information depends on the type of instruments (e.g., topographic map, address, GPS, etc.) used to record/report the location as well as the diligence of the reporting entity. Some wells are located only to the quadrangle ninth. The user will notice these wells mapped in the southeast (lower right) corner of the corresponding quadrangle ninth polygon. It is suggested that the user review the data using the provided coordinates in conjunction with the location/address, and the well owner's name.

Municipal well locations are considered confidential under Tenn. Code Ann. § 10-7-504 (a)(21)(A) and Tenn. Comp. R. & Regs. 0400-01-01-.01(4)(c), so the location of those data have been redacted from the records provided. A request can be made for an evaluation of these features in an area of interest by e-mailing the Division of Water Resources at the address listed below. Once a request is made, we will provide information pertaining to the presence or absence of these features for an area of interest.

E-mail us at [Richard.Rogers@TN.gov](mailto:Richard.Rogers@TN.gov) with questions regarding Tennessee Water Wells.

Driller Report Summary

BackPrint

WELL NUMBER		WELL OWNER INFORMATION	
Well Number	15709010	Company Name	FRISCO RRR SH K-9K-9
Driller Tag Number	-	Owner Name	
Inspection Tag Number	-	Address	-
Date Received	-	Address (Line 2)	-
		City	-
		State	-
		Zip Code	-
WELL CONTRACTOR		PROPOSED USE OF WELL	
License Number	-	Well Use	Industrial
Driller Name			
Rig Operator			
WELL LOCATION		PRIMARY CASING	
County Name	SHELBY	Diameter (in)	8
Driller Map No.	-	Top Set (in-above ground)	-
Quad Name	SOUTHEAST-MEMPHIS	Primary Casing Depth (ft-b...	-
Quad Number	0409SW	Primary Casing Type	-
Quad Nth	1	Wall Thickness	-
Address	-	SDR#	-
Address Line 2	-	WELL FINISH	
City Name	-		
State Name	-		
Zip	-		

Zip Ext	-
Distance From Landmark (...)	-
Direction From Landmark	-
Nearest Landmark	-
Latitude	35.09416666
Longitude	-89.98611111

TYPE OF WORK

Date Drill Rig Left Site	-
Type of Work	New Well

WELL COMPLETION DATA

Completion Date	-
Total Depth (ft-bgs)	371
Depth To Bedrock (ft)	-
Static Level (ft-bgs)	65
Estimated Yield (GPM)	500

WATER-BEARING ZONES

Depth (ft-bgs)	GPM ↓ =	GPH	Water Quality
311	-	-	-

WELL TEST

Tested By	-
Static Level (ft-bgs)	-

Well Finish	-
From (ft-bgs)	311
To (ft-bgs)	371
Screen Type	-
Slot Size (in)	-
Gravel Pack From (ft-bgs)	-
Gravel Pack To (ft-bgs)	-

BACK FILL MATERIAL

No Data Found
---------------

LINER CASING

Type	-
Diameter (in)	-
From (ft-bgs)	-
To (ft-bgs)	-
Packers Installed?	-
Packer 1 Depth (ft-bgs)	-
Packer 2 Depth (ft-bgs)	-

ANTICIPATED WATER QUALITY

Appearance	-
Taste	-
Odor	-
Other	-



Pumping Level (ft-bgs)	-
Test After Hours	-
Test After Mins	-
Test Yield (GPM)	-
Hours Prior to Test	-
Minutes Prior to Test	-

FORMATION LOG

Depth from (ft) ↑≡	Depth to (ft)	Description
-	-	-

GENERAL INFORMATION

Well Disinfected?	-
Well Capped?	-
50ft From Septic System?	-
Septic Distance Provided By	-
Drilling Process Water Obta...	-
Pump Installed By Driller?	-

COMMENTS

Comments

The license\_no1= is bad. So I used license no 0 instead; info\_identity1.taxmap1=; info\_identity1.parcel1=; The well\_type1 is null so I set it to New Work; info\_description1.form\_log1=; info\_description1.elevation1=285;;There is no Driller Map Number available;

If you have any questions or comments, call us at (615) 532-0287 or email the TDEC Help Desk at BG-Help\_Desk@tn.gov.



Driller Report Summary

Back

Print

WELL NUMBER

Well Number	15709011
Driller Tag Number	-
Inspection Tag Number	-
Date Received	-

WELL CONTRACTOR

License Number	-
Driller Name	
Rig Operator	

WELL LOCATION

County Name	SHELBY
Driller Map No.	-
Quad Name	SOUTHEAST-MEMPHIS
Quad Number	0409SW
Quad Nth	1
Address	-
Address Line 2	-
City Name	-
State Name	-
Zip	-

WELL OWNER INFORMATION

Company Name	FRISCO RR SH K-10-10
Owner Name	
Address	-
Address (Line 2)	-
City	-
State	-
Zip Code	-

PROPOSED USE OF WELL

Well Use	Industrial
----------	------------

PRIMARY CASING

Diameter (in)	8
Top Set (in-above ground)	-
Primary Casing Depth (ft-b...	-
Primary Casing Type	-
Wall Thickness	-
SDR#	-

WELL FINISH

Zip Ext	-
Distance From Landmark (...)	-
Direction From Landmark	-
Nearest Landmark	-
Latitude	35.09388888
Longitude	-89.98722222

TYPE OF WORK

Date Drill Rig Left Site	-
Type of Work	New Well

WELL COMPLETION DATA

Completion Date	-
Total Depth (ft-bgs)	386
Depth To Bedrock (ft)	-
Static Level (ft-bgs)	76
Estimated Yield (GPM)	-

WATER-BEARING ZONES

Depth (ft-bgs)	GPM ↓ =	GPH	Water Quality
-	-	-	-

WELL TEST

Tested By	-
Static Level (ft-bgs)	-

Well Finish	-
From (ft-bgs)	336
To (ft-bgs)	386
Screen Type	-
Slot Size (in)	-
Gravel Pack From (ft-bgs)	-
Gravel Pack To (ft-bgs)	-

BACK FILL MATERIAL

No Data Found

LINER CASING

Type	-
Diameter (in)	-
From (ft-bgs)	-
To (ft-bgs)	-
Packers Installed?	-
Packer 1 Depth (ft-bgs)	-
Packer 2 Depth (ft-bgs)	-

ANTICIPATED WATER QUALITY

Appearance	Good
Taste	-
Odor	-
Other	-

Pumping Level (ft-bgs)	-
Test After Hours	-
Test After Mins	-
Test Yield (GPM)	-
Hours Prior to Test	-
Minutes Prior to Test	-

FORMATION LOG

Depth from (ft) ↑≡	Depth to (ft)	Description
-	-	-

GENERAL INFORMATION

Well Disinfected?	-
Well Capped?	-
50ft From Septic System?	-
Septic Distance Provided By	-
Drilling Process Water Obta...	-
Pump Installed By Driller?	-

COMMENTS

Comments

The license\_no1= is bad. So I used license no 0 instead; info\_identity1.taxmap1=; info\_identity1.parcel1=; The well\_type1 is null so I set it to New Work; info\_description1.form\_log1=; info\_description1.elevation1=280;;There is no Driller Map Number available;

If you have any questions or comments, call us at (615) 532-0287 or email the TDEC Help Desk at BG-Help\_Desk@tn.gov.



Driller Report Summary

Back

Print

WELL NUMBER

Well Number	15709014
Driller Tag Number	-
Inspection Tag Number	-
Date Received	-

WELL CONTRACTOR

License Number	-
Driller Name	
Rig Operator	

WELL LOCATION

County Name	SHELBY
Driller Map No.	-
Quad Name	SOUTHEAST-MEMPHIS
Quad Number	0409SW
Quad Nth	1
Address	-
Address Line 2	-
City Name	-
State Name	-
Zip	-

WELL OWNER INFORMATION

Company Name	RAILWAYS ICE SH:K-13
Owner Name	
Address	-
Address (Line 2)	-
City	-
State	-
Zip Code	-

PROPOSED USE OF WELL

Well Use	Other
----------	-------

PRIMARY CASING

Diameter (in)	8
Top Set (in-above ground)	-
Primary Casing Depth (ft-b...	330
Primary Casing Type	Steel
Wall Thickness	-
SDR#	-

WELL FINISH

Zip Ext	-
Distance From Landmark (...)	-
Direction From Landmark	-
Nearest Landmark	-
Latitude	35.09472222
Longitude	-89.98277777

TYPE OF WORK

Date Drill Rig Left Site	-
Type of Work	New Well

WELL COMPLETION DATA

Completion Date	-
Total Depth (ft-bgs)	380
Depth To Bedrock (ft)	-
Static Level (ft-bgs)	118
Estimated Yield (GPM)	-

WATER-BEARING ZONES

Depth (ft-bgs)	GPM ↓ =	GPH	Water Quality
355	-	-	-

WELL TEST

Tested By	-
Static Level (ft-bgs)	-

Well Finish	-
From (ft-bgs)	330
To (ft-bgs)	380
Screen Type	-
Slot Size (in)	-
Gravel Pack From (ft-bgs)	-
Gravel Pack To (ft-bgs)	-

BACK FILL MATERIAL

No Data Found
---------------

LINER CASING

Type	-
Diameter (in)	-
From (ft-bgs)	-
To (ft-bgs)	-
Packers Installed?	-
Packer 1 Depth (ft-bgs)	-
Packer 2 Depth (ft-bgs)	-

ANTICIPATED WATER QUALITY

Appearance	-
Taste	-
Odor	-
Other	-



Pumping Level (ft-bgs)	-
Test After Hours	-
Test After Mins	-
Test Yield (GPM)	-
Hours Prior to Test	-
Minutes Prior to Test	-

FORMATION LOG

Depth from (ft) ↑≡	Depth to (ft)	Description
-	-	-

GENERAL INFORMATION

Well Disinfected?	-
Well Capped?	-
50ft From Septic System?	-
Septic Distance Provided By	-
Drilling Process Water Obta...	-
Pump Installed By Driller?	-

COMMENTS

Comments

The license\_no1= is bad. So I used license no 0 instead; info\_identity1.taxmap1=; info\_identity1.parcel1=; info\_identity1.well\_type1=5; info\_description1.form\_log1=; info\_description1.elevation1=290;;There is no Driller Map Number available;

If you have any questions or comments, call us at (615) 532-0287 or email the TDEC Help Desk at BG-Help\_Desk@tn.gov.



Driller Report Summary

Back

Print

WELL NUMBER

Well Number	15709015
Driller Tag Number	-
Inspection Tag Number	-
Date Received	-

WELL CONTRACTOR

License Number	-
Driller Name	
Rig Operator	

WELL LOCATION

County Name	SHELBY
Driller Map No.	-
Quad Name	SOUTHEAST-MEMPHIS
Quad Number	0409SW
Quad Nth	1
Address	-
Address Line 2	-
City Name	-
State Name	-
Zip	-

WELL OWNER INFORMATION

Company Name	RAILWAYS ICE SH:K-14
Owner Name	
Address	-
Address (Line 2)	-
City	-
State	-
Zip Code	-

PROPOSED USE OF WELL

Well Use	Industrial
----------	------------

PRIMARY CASING

Diameter (in)	8
Top Set (in-above ground)	-
Primary Casing Depth (ft-b...	-
Primary Casing Type	-
Wall Thickness	-
SDR#	-

WELL FINISH

Zip Ext	-
Distance From Landmark (...)	-
Direction From Landmark	-
Nearest Landmark	-
Latitude	35.09444444
Longitude	-89.98277777

TYPE OF WORK

Date Drill Rig Left Site	-
Type of Work	New Well

WELL COMPLETION DATA

Completion Date	03/06/1947
Total Depth (ft-bgs)	390
Depth To Bedrock (ft)	-
Static Level (ft-bgs)	107
Estimated Yield (GPM)	-

WATER-BEARING ZONES

Depth (ft-bgs)	GPM ↓ =	GPH	Water Quality
-	-	-	-

WELL TEST

Tested By	-
Static Level (ft-bgs)	-

Well Finish	-
From (ft-bgs)	-
To (ft-bgs)	-
Screen Type	-
Slot Size (in)	-
Gravel Pack From (ft-bgs)	-
Gravel Pack To (ft-bgs)	-

BACK FILL MATERIAL

No Data Found
---------------

LINER CASING

Type	-
Diameter (in)	-
From (ft-bgs)	-
To (ft-bgs)	-
Packers Installed?	-
Packer 1 Depth (ft-bgs)	-
Packer 2 Depth (ft-bgs)	-

ANTICIPATED WATER QUALITY

Appearance	Good
Taste	-
Odor	-
Other	-

Pumping Level (ft-bgs)	-
Test After Hours	-
Test After Mins	-
Test Yield (GPM)	-
Hours Prior to Test	-
Minutes Prior to Test	-

FORMATION LOG

Depth from (ft) ↑≡	Depth to (ft)	Description
-	-	-

GENERAL INFORMATION

Well Disinfected?	-
Well Capped?	-
50ft From Septic System?	-
Septic Distance Provided By	-
Drilling Process Water Obta...	-
Pump Installed By Driller?	-

COMMENTS

Comments

The license\_no1= is bad. So I used license no 0 instead; info\_identity1.taxmap1=; info\_identity1.parcel1=; The well\_type1 is null so I set it to New Work; info\_description1.form\_log1=; info\_description1.elevation1=290;;There is no Driller Map Number available;

If you have any questions or comments, call us at (615) 532-0287 or email the TDEC Help Desk at BG-Help\_Desk@tn.gov.



Driller Report Summary

Back

Print

WELL NUMBER		WELL OWNER INFORMATION	
Well Number	15709033	Company Name	KELLOGG CO SHSK- 3333
Driller Tag Number	-	Owner Name	
Inspection Tag Number	-	Address	-
Date Received	-	Address (Line 2)	-
		City	-
		State	-
		Zip Code	-
WELL CONTRACTOR		PROPOSED USE OF WELL	
License Number	-	Well Use	Industrial
Driller Name			
Rig Operator			
WELL LOCATION		PRIMARY CASING	
County Name	SHELBY	Diameter (in)	9
Driller Map No.	-	Top Set (in-above ground)	-
Quad Name	SOUTHEAST- MEMPHIS	Primary Casing Depth (ft-b...	-
Quad Number	0409SW	Primary Casing Type	-
Quad Nth	1	Wall Thickness	-
Address	-	SDR#	-
Address Line 2	-	WELL FINISH	
City Name	-		
State Name	-		
Zip	-		

Zip Ext	-
Distance From Landmark (...)	-
Direction From Landmark	-
Nearest Landmark	-
Latitude	35.09583333
Longitude	-89.99

TYPE OF WORK

Date Drill Rig Left Site	-
Type of Work	New Well

WELL COMPLETION DATA

Completion Date	-
Total Depth (ft-bgs)	389
Depth To Bedrock (ft)	-
Static Level (ft-bgs)	100
Estimated Yield (GPM)	-

WATER-BEARING ZONES

Depth (ft-bgs)	GPM ↓ =	GPH	Water Quality
-	-	-	-

WELL TEST

Tested By	-
Static Level (ft-bgs)	-

Well Finish	-
From (ft-bgs)	-
To (ft-bgs)	-
Screen Type	-
Slot Size (in)	-
Gravel Pack From (ft-bgs)	-
Gravel Pack To (ft-bgs)	-

BACK FILL MATERIAL

No Data Found
---------------

LINER CASING

Type	-
Diameter (in)	-
From (ft-bgs)	-
To (ft-bgs)	-
Packers Installed?	-
Packer 1 Depth (ft-bgs)	-
Packer 2 Depth (ft-bgs)	-

ANTICIPATED WATER QUALITY

Appearance	Good
Taste	-
Odor	-
Other	-



Pumping Level (ft-bgs)	-
Test After Hours	-
Test After Mins	-
Test Yield (GPM)	-
Hours Prior to Test	-
Minutes Prior to Test	-

FORMATION LOG

Depth from (ft) ↑≡	Depth to (ft)	Description
-	-	-

GENERAL INFORMATION

Well Disinfected?	-
Well Capped?	-
50ft From Septic System?	-
Septic Distance Provided By	-
Drilling Process Water Obta...	-
Pump Installed By Driller?	-

COMMENTS

Comments

The license\_no1= is bad. So I used license no 0 instead; info\_identity1.taxmap1=; info\_identity1.parcel1=; The well\_type1 is null so I set it to New Work; info\_description1.form\_log1=; info\_description1.elevation1=275;;There is no Driller Map Number available;

If you have any questions or comments, call us at (615) 532-0287 or email the TDEC Help Desk at BG-Help\_Desk@tn.gov.

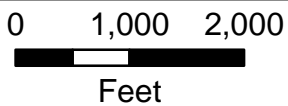




Document Path: \\W:\Site Inspection\2024\Well survey.mxd

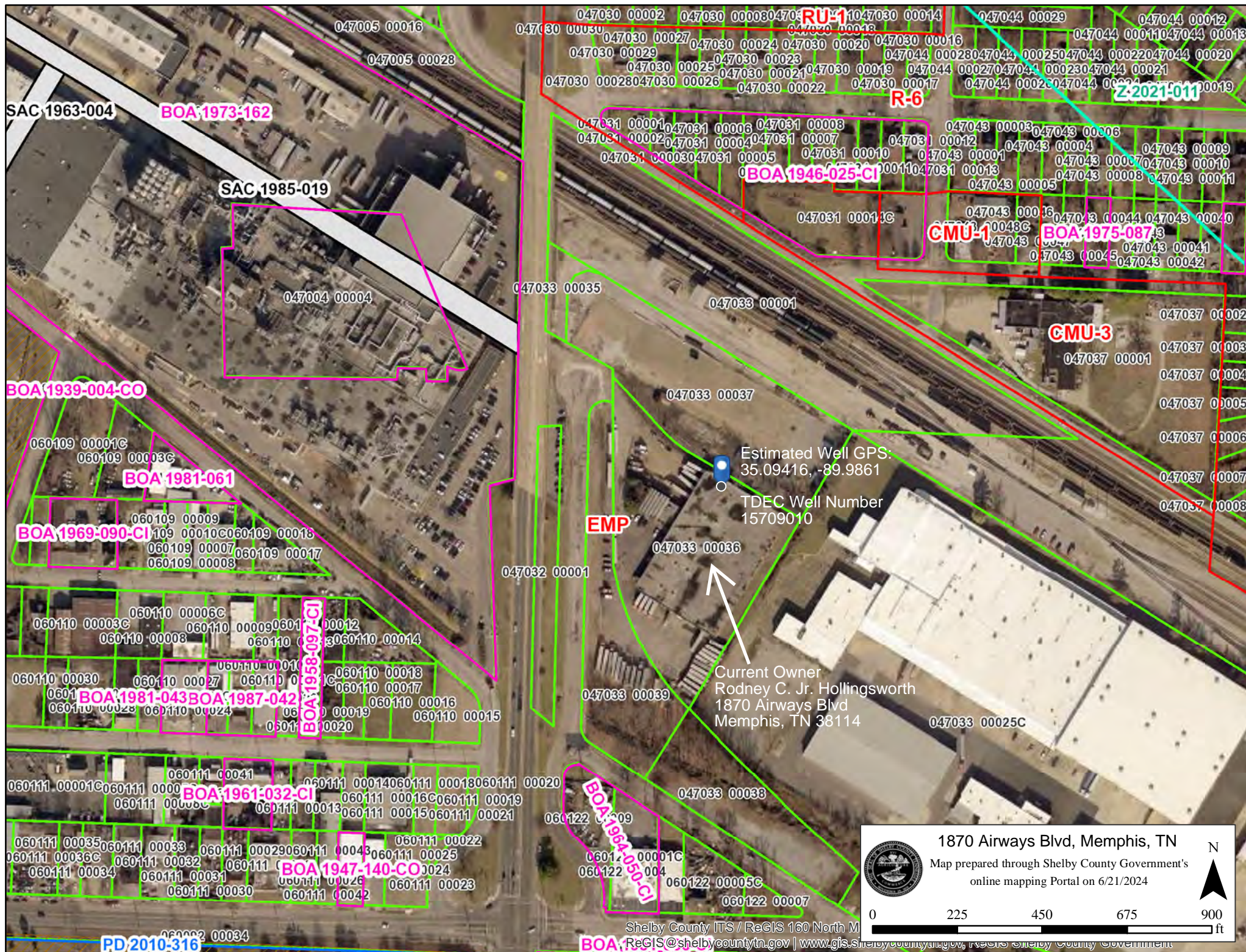


**Note:**  
NPL Site Boundary based on Property Boundary and Off-Site Contamination above maximum contaminant level.

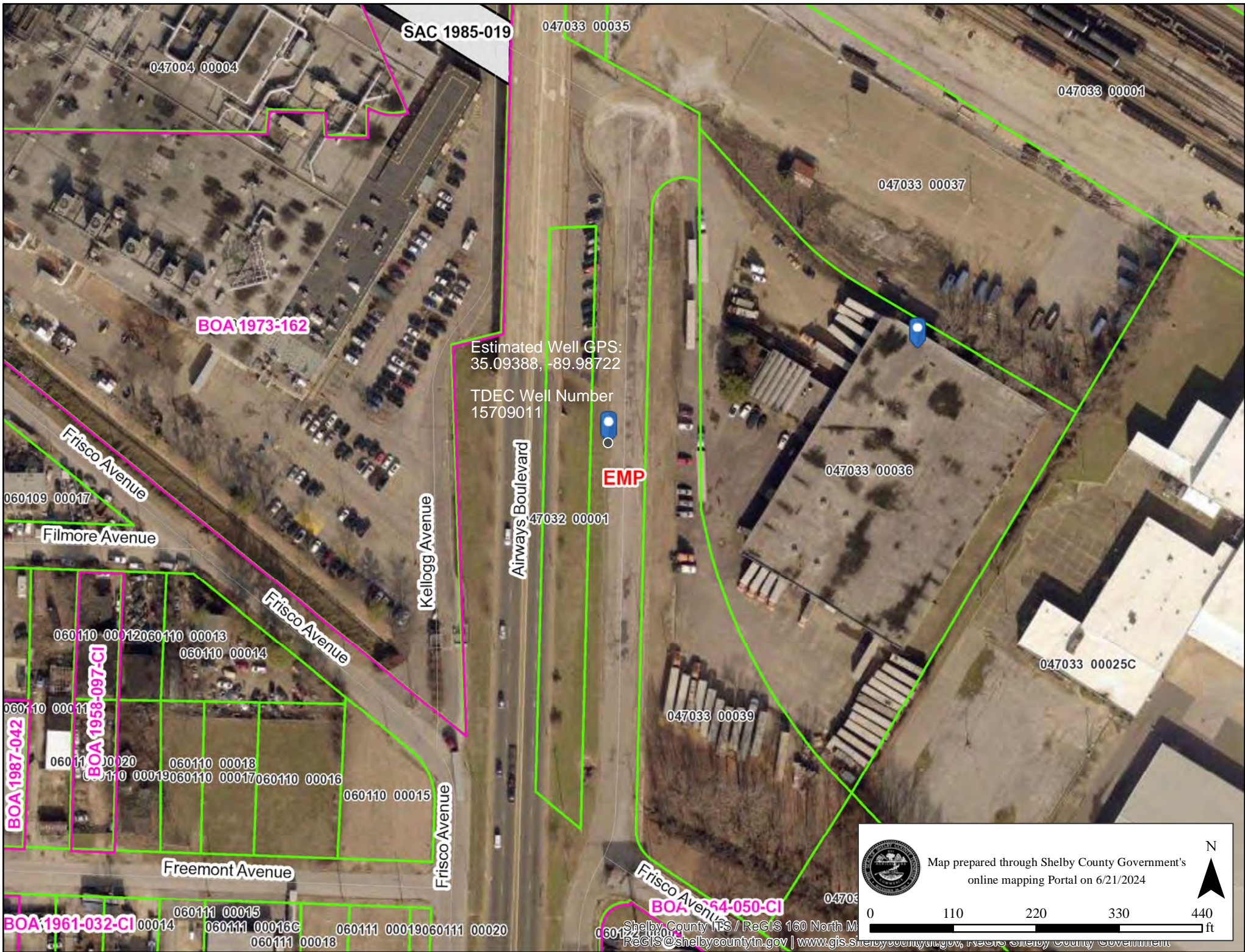


**Figure F-4**  
**Water Well**  
**Location Figure**  
2024 Annual Site Inspection  
Defense Depot  
Memphis, Tennessee

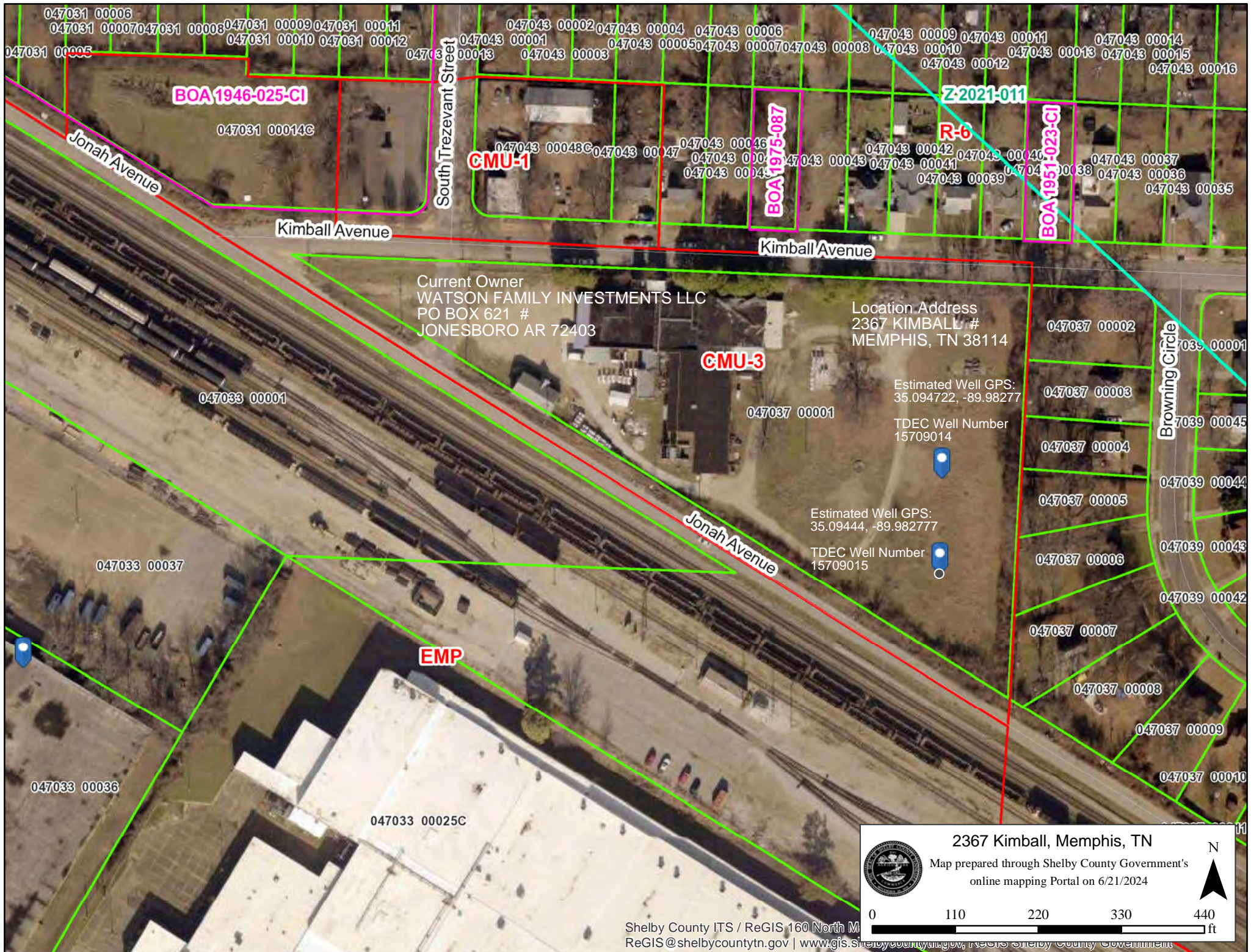













Current Owner  
WATSON FAMILY INVESTMENTS LLC  
PO BOX 621 #  
JONESBORO AR 72403

Location Address  
2367 KIMBALL #  
MEMPHIS, TN 38114


Estimated Well GPS:  
35.094722, -89.98277  
TDEC Well Number  
15709014

Estimated Well GPS:  
35.09444, -89.98277  
TDEC Well Number  
15709015

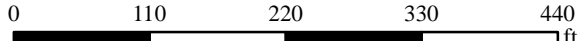


2367 Kimball, Memphis, TN

Map prepared through Shelby County Government's  
online mapping Portal on 6/21/2024

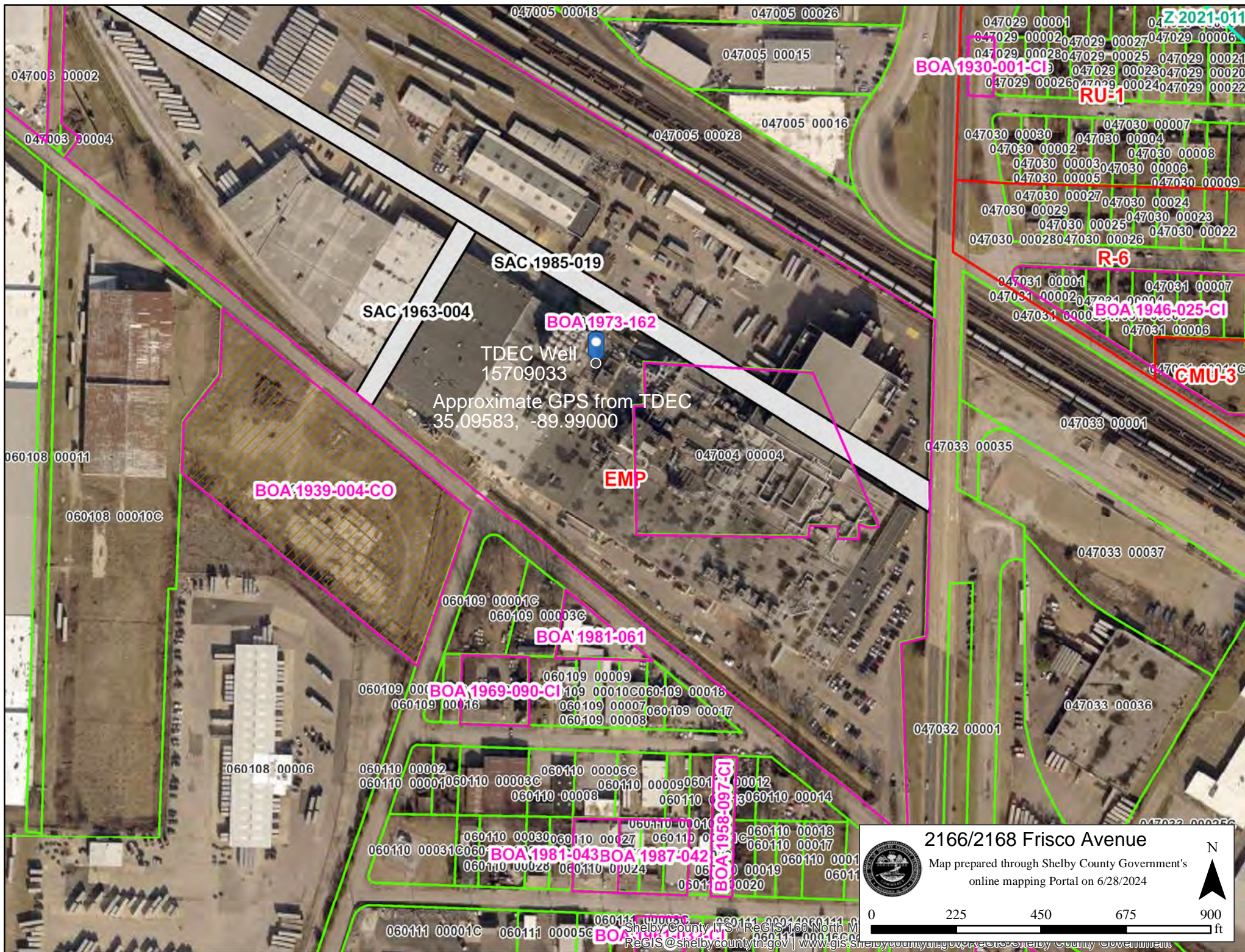


N



0 110 220 330 440 ft



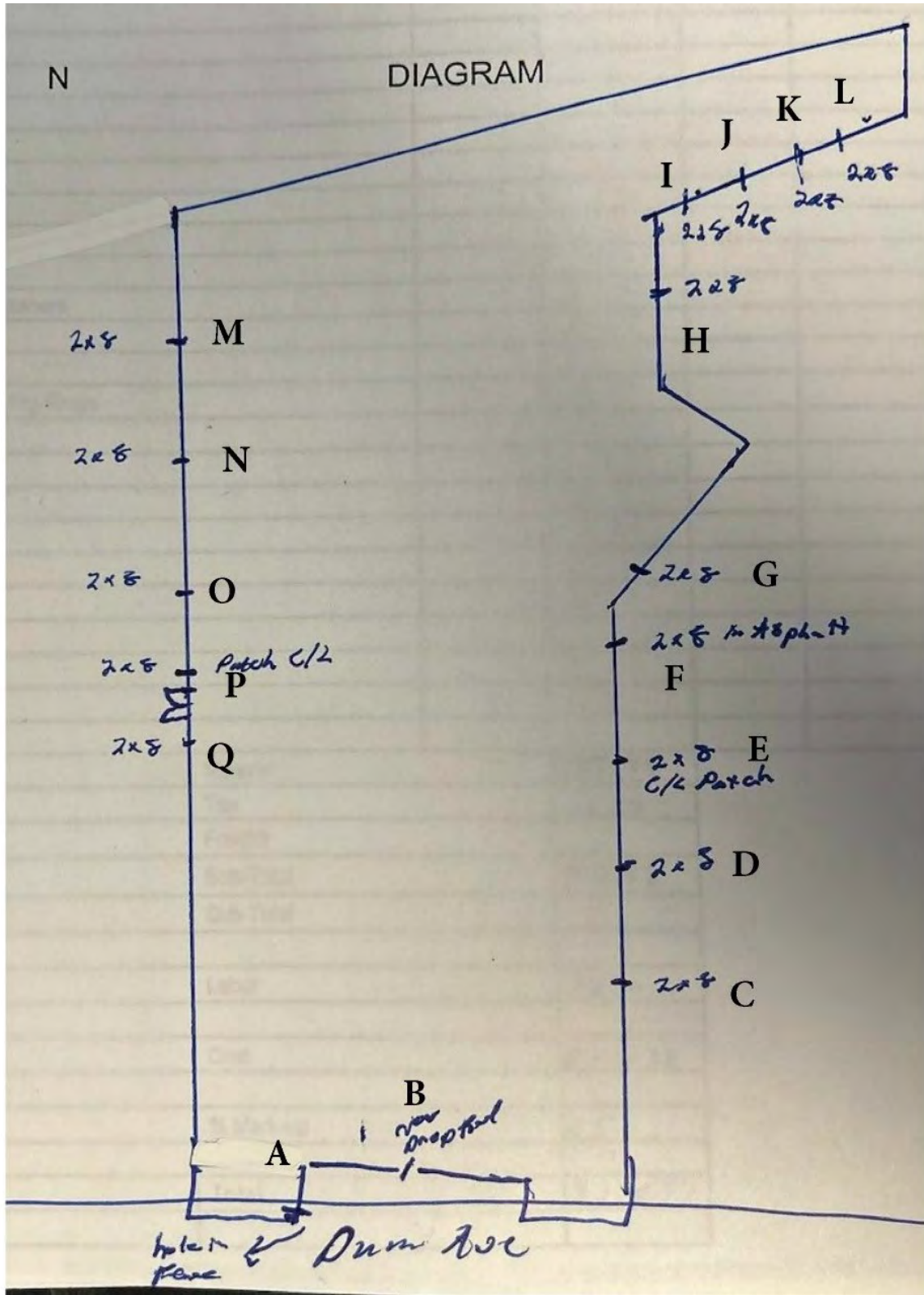




## **Appendix G**

### **Dunn Field Fence Repair Summaries**

DDMT Dunn Field Fence Repairs  
February 2024



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 735 617 762">Location A –Hole in chain link fence at gate</p>	 <p data-bbox="824 735 1445 762">Location A – Hole in chain link fence at gate repaired</p>
 <p data-bbox="110 1453 522 1480">Location B –Bent drop pole in gate.</p>	 <p data-bbox="824 1354 1494 1423">Location B – Drop pole in gate replaced; however, corner post is sheared at ground level causing gate to sag.</p>



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 766 800 798">Location B – Sheared corner post causing gate to sag.</p>	 <p data-bbox="831 766 1523 829">Location B – Sheared corner post replaced. Gate swings freely.</p>
 <p data-bbox="110 1354 800 1386">Location C – Damaged pole</p>	 <p data-bbox="831 1354 1523 1386">Location C – Pole replaced</p>



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p>Location D – Damaged pole</p>	 <p>Location D – Pole replaced</p>
 <p>Location E – Left pole damaged and barbed wire missing</p>	 <p>Location E – Pole replaced and barbed wire repaired</p>

**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 766 435 800">Location F – Damaged pole.</p>	 <p data-bbox="824 766 1143 800">Location F – Pole replaced.</p>
 <p data-bbox="110 1318 441 1352">Location G – Damaged pole.</p>	 <p data-bbox="824 1318 1140 1352">Location G – Pole replaced</p>



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 764 435 798">Location H – Damaged pole</p>	 <p data-bbox="824 764 1140 798">Location H – Pole replaced</p>
 <p data-bbox="110 1314 425 1348">Location I – Damaged pole</p>	 <p data-bbox="824 1314 1130 1348">Location I – Pole replaced</p>

**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 764 427 800">Location J – Damaged pole</p>	 <p data-bbox="824 793 1141 827">Location J – Pole replaced.</p>
 <p data-bbox="110 1344 639 1379">Location K – Damaged pole and barbed wire.</p>	 <p data-bbox="824 1371 1446 1404">Location K – Pole replaced and barbed wire repaired</p>



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 762 435 800">Location L – Damaged pole.</p>	 <p data-bbox="824 762 1136 800">Location L – Pole replaced</p>
 <p data-bbox="110 1314 448 1352">Location M – Damaged pole.</p>	 <p data-bbox="824 1314 1149 1352">Location M – Pole replaced</p>









**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 766 435 798">Location N – Damaged pole</p>	 <p data-bbox="824 762 1141 793">Location N – Pole replaced.</p>
 <p data-bbox="110 1320 435 1352">Location O – Damaged pole</p>	 <p data-bbox="824 1316 1149 1348">Location O – Pole replaced.</p>



**DDMT Dunn Field Fence Repairs  
February 2024**

Damage Identified	Damage Repaired
 <p data-bbox="110 741 750 772">Location P – Damaged pole and repair chain link fence</p>	 <p data-bbox="824 741 1485 772">Location P – Pole replaced and chain link fence repaired</p>
 <p data-bbox="110 1293 435 1327">Location Q – Damaged pole</p>	 <p data-bbox="824 1293 1149 1327">Location Q – Pole replaced.</p>
 <p data-bbox="110 1848 641 1879">Location Q continued – Barbed wire damage.</p>	 <p data-bbox="824 1848 1367 1879">Location Q continued – Barbed wire replaced.</p>

---

# Memorandum

To: Bill Millar, CALIBRE Systems, Inc.  
Melissa Shirley & Chase Carter, USACE-Mobile

From: Denise Cooper  
Clayton Mokri

Date: 9 January 2025

Re: December 2024 Fence Clearing Inspection  
Dunn Field, Defense Depot Memphis, Tennessee

---

On December 18 and 30, 2024, Denise Cooper performed visual inspection of the DDMT Dunn Field fence after vegetation removal by Brewer's Lawn Care and Property Preservation. The inspection included walking the fence line to confirm vegetation had been removed from both sides of the fence and to identify structural damage to the fence. A railroad line, owned by Canadian National Railway Company, borders the northern boundary of Dunn Field, and access was not available to clear the north side of that section of fence.

Photographs document the clearing and the damage to the fence are provided in [Appendix A](#). Findings from the inspection are listed below.

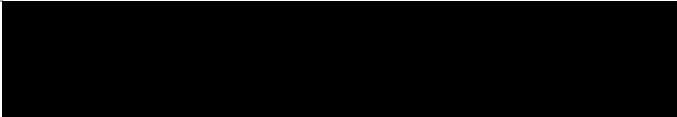
- Vegetation was removed from both sides of fence, except for approximately 1,000 linear feet along the outside of the fence on the northern perimeter of Dunn Field, where only the south side of the fence was accessible.
- Vegetation was chipped/mulched onsite.
- The inspection identified the following deficiencies:
  - 8 damaged fence posts,
  - 15 damaged barbed wire V-arms, and
  - Approximately 300 feet of damaged barbed wire.

Locations of damage to the fence (A to H) are identified in the photograph captions and shown on [Figure 1](#). The inspection indicates the perimeter fence is sufficient to prevent casual access by unauthorized personnel. Repair of the damaged fence posts and sections of barbed wire is recommended to further limit access.



# Figures

- 1 Dunn Field Fence Inspection Findings







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

**Figure 1**

**Dunn Field Fence Inspection Findings**

Defense Depot  
Memphis, Tennessee

**Legend**

- Photolog Reference
- Fence Missing Barbed Wire
- Fence Required by Dunn Field ROD
- Railroad
- x - x Fence
- Original Property Boundary
- Area Designations
- Roads

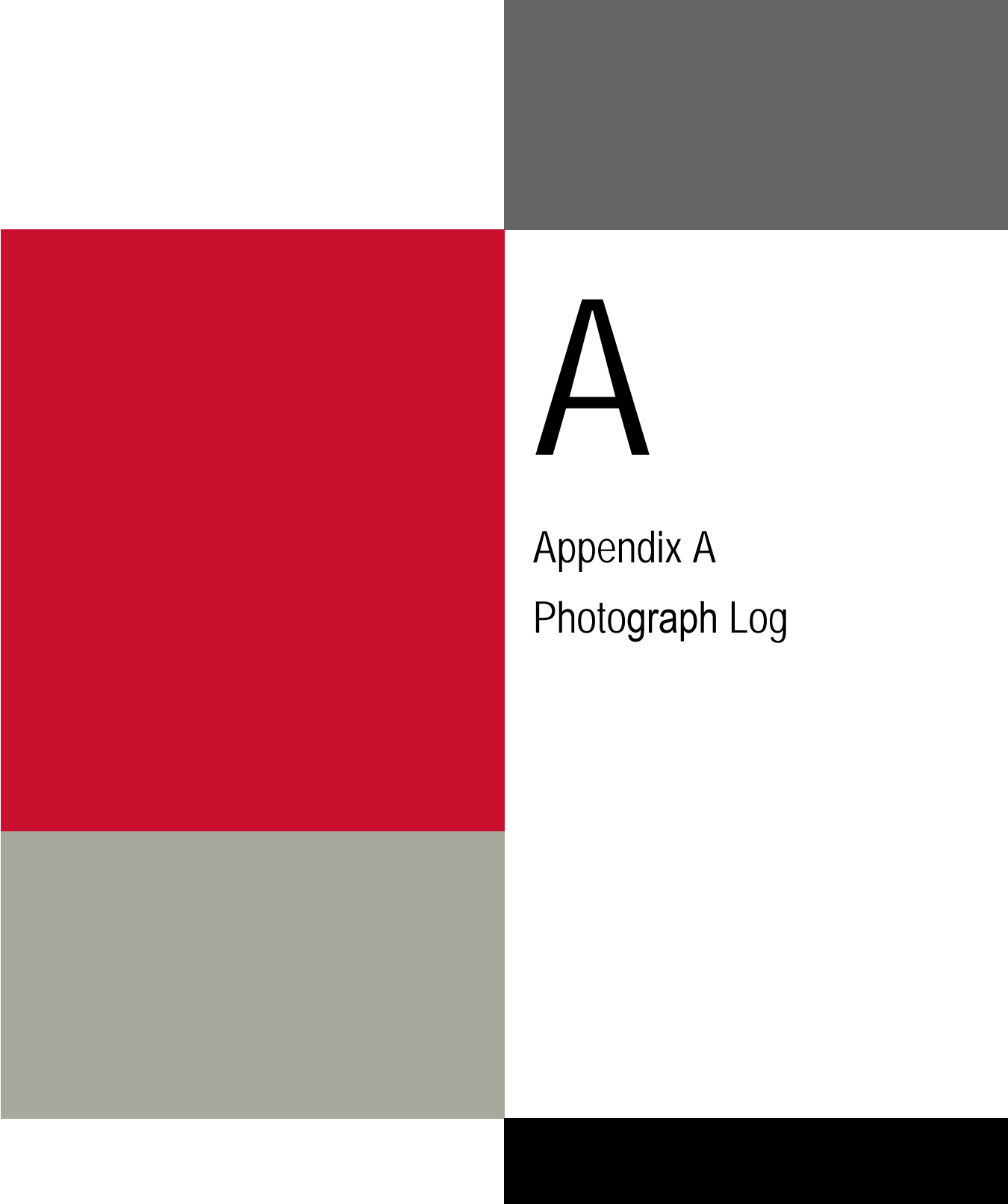
**Use Restrictions:**

- ▨ Unrestricted Use Area
- Area subject to use restrictions

0 250 500  
Feet

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

Date: 1/8/2025  
Edition: Rev 0



# A

## Appendix A Photograph Log

**Photograph Log**  
**DDMT Dunn Field Fence Clearing Inspection**  
**December 2024**



Southern fence along Dunn Avenue looking east from corner where fence turns north.



Western fence from southern fence corner looking north.



Western fence looking north. Barbed wire in several places along top of fence is damaged.



Western fence looking south. Barbed wire in several places along top of fence is damaged.



**Photograph Log**  
**DDMT Dunn Field Fence Clearing Inspection**  
**December 2024**

	
Western fence looking south just before fence turns west. Fence post on right side of photo is damaged ( <b>Location A</b> , Figure 1). Barbed wire in several places along top of fence is damaged (Figure 1).	Western fence looking north. Barbed wire in several places along top of fence is damaged (Figure 1).
	
Western fence near MW-81 area with broken fence post ( <b>Location B</b> , Figure 1).	Western fence looking south from western gate. Barbed wire in several places along top of fence is damaged.



**Photograph Log**  
**DDMT Dunn Field Fence Clearing Inspection**  
**December 2024**



Western fence just south of gate looking south. Barbed wire in several places along top of fence is damaged (Figure 1).



Western fence just north of gate looking south.



Western fence just north of gate looking south. Fence post missing (**Location C**, Figure 1) and barbed wire in several places along top of fence is damaged (Figure 1).



Western fence north of gate looking west. Fence post bent (**Location D**, Figure 1) and barbed wire damaged (Figure 1).



**Photograph Log**  
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**December 2024**



Western fence looking south. Barbed wire damaged in several places (Figure 1).



Western fence looking west where fence turns west (corner of Kyle and Rozelle).



Western fence from corner of Kyle/Rozelle looking north.



Western fence looking north where fence turns east. Fence post missing at left side of photo (**Location E**, Figure 1). Barbed wire damaged in several places (Figure 1).



**Photograph Log**  
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**December 2024**

	
<p>Western fence almost to corner where fence turns east. Damaged fence post (<b>Location F</b>, Figure 1) and barbed wire in several places (Figure 1).</p>	<p>Northern fence looking west where fence turns south. Army side of fence cleared; access not granted to railroad property on other side.</p>
	
<p>Northern fence at bottom of hill looking east. Army side of fence cleared; access not granted to railroad property on other side.</p>	<p>Northern fence from top of hill looking east. Army side of fence cleared; access not granted to railroad property on other side.</p>



**Photograph Log**  
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**December 2024**



Eastern fence looking west from Hayes Road.



Eastern fence looking east from top of hill.



Eastern fence looking east from where fence turns south.



Eastern fence looking southwest where fence turns south.



Photograph Log  
DDMT Dunn Field Fence Clearing Inspection  
December 2024



Eastern fence looking east across from former FSVE compound.



Eastern fence looking south.



Eastern fence with broken fence post (**Location G**, Figure 1).



Eastern fence with broken fence post (**Location H**, Figure 1).