



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 178

IN REPLY  
REFER TO

DDMT-D

DEFENSE LOGISTICS AGENCY  
DEFENSE DISTRIBUTION DEPOT MEMPHIS  
2163 AIRWAYS BOULEVARD  
MEMPHIS, TENNESSEE 38114-5211

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AUG 29 1996

Kenneth Bradshaw and Doris Bradshaw  
Co-Chairperson(s) of DDMT-CCC  
1453 East Mallory  
Memphis TN 38106

Dear Kenneth Bradshaw and Doris Bradshaw:

This letter is in response to your two letters of July 18, 1996

In your first July 18, 1996, letter, you request the Depot place "poison signs with the internationally recognized skull and crossbones symbol" along the perimeter of DDMT, and the "entire length of all ditches (both banks), drainage ditches, and creeks exposed to above-threshold levels and EPA action-levels of toxic lead emissions."

You state that the reason for your request is to protect the community from undue and unnecessary exposure to harmful levels of lead and tetrachloroethane.

To date, there is no indication of significant levels of toxic lead emissions or other toxic substance emissions on the main Depot facility. Therefore I must deny your request to post signage around the perimeter of the facility and along the drainage ditches. Contaminants, however, have been identified in the underground burial sites at Dunn Field and in the vicinity of the Depot's paint and sandblast facility. In its November 8, 1995, report, the Agency for Toxic Substance and Disease Registry (ATSDR) did not find any risk of human exposure from these sites because of the absence of a contamination pathway.

The Depot's drainage ditches on the main installation are concrete lined. Tests do not indicate that toxic substances, including lead, are leaving the facility via these ditches or by other means. The ATSDR supplemental report dated April 18, 1996, (attached) concludes that although numerous contaminants were detected in the ditches they were not of the type and amounts that would pose a public health hazard from infrequent and short-term dermal exposure.

In sum, we have no evidence indicating exposure of Depot employees or to the community to harmful levels of lead, tetrachloroethane or any other toxic substance. This conclusion is the same as that reached by the ATSDR in their reports. We continue, however to seek information regarding possible risks to the community and ATSDR is obliged to consider any newly discovered relevant information and review its initial conclusions. We urge you to share with us any additional evidence you have on this subject and we will request a full and thorough consideration of such evidence.

In your second letter of July 18, 1996, you request the Depot also "place the appropriate signs along the entire 640-acre perimeter and inside every building notify workers and the public at large that the federal facility is an NPL Superfund site, the facility is an unregulated hazardous waste site scheduled for cleanup of toxic and hazardous waste in the near future and the facility is an environmental danger to visitation and habitation". You further state the Depot "is an unregulated NPL Superfund Site because the facility is an illegal, uncontrolled, unregulated dump - not a manufacturing concern - which constantly violates EPA regulation, as toxic chemicals and harmful elements exudes from the facility with rainfall infiltration and surface water runoff."

I must also deny your request for signs indicating that the Depot is an unregulated hazardous waste NPL site. The Depot is a heavily regulated and environmentally controlled facility. Federal, state and local regulators have environmental jurisdiction over the Depot. The Depot holds permits for air and storm water emissions as well as a Resource Conservation and Recovery Act (RCRA) permit governing the handling of hazardous waste. The Environmental Protection Agency (EPA) and State of Tennessee inspect the Depot on a regular basis to assure compliance with all permit requirements and environmental regulations. In addition, these permits require samples be taken on a regular basis and submitted to the State to assure compliance. The Depot also submits reports to these regulators as required by each permit.

The Depot's RCRA permit ensures that the handling of any hazardous waste is properly carried out. Regular EPA and State RCRA inspectors also monitor the Depot's handling of hazardous waste. A record of the Depot's hazardous material is located at the Local Emergency Planning Commission and the Tennessee Emergency Management Agency.

Finally, as a National Priority List site, the cleanup of the Depot is managed and controlled under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 42 U.S.C. 9620 (c)(i), the National Contingency Plan (NCP) 40 C.F.R. Part 300, and various executive orders. In 1995, the EPA, State of Tennessee and the Depot entered into a Federal Facility Agreement which provides specific and exacting requirements and active involvement by State and Federal regulators in site environmental restoration. Active community involvement and awareness is an integral part of the cleanup process.

The Depot has published appropriate notices in local newspapers and in newsletters, reflecting the Depot's NPL status and planned restoration activities. Also, the Depot has taken an aggressive approach to community involvement in the restoration process. The Restoration Advisory Board (RAB) holds regular monthly meetings. RAB

members and participants include relevant Depot staff, contractors, EPA and State regulators, and members and representatives of the community.

The Depot is a federal facility which is entirely fenced, posted with "No Trespassing" signs and patrolled by security personnel. The facility is properly designated by appropriate signage. However, I take your concerns seriously, and I am forwarding your letters to ATSDR for their review.

*Eric W. Holladay*  
fa M. J. KENNEDY  
Colonel, USMC  
Commander

Enclosure

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