



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

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III. Significant Issues

A. General

DDMT recently lost three more of its environmental staff, including the BEC, to jobs elsewhere. Christine Kartman's performance as the environmental manager and BEC was outstanding, and it is likely that the project will suffer with her loss. While the job openings are advertised, Michael Dobbs of the DLA mid-east region (New Cumberland, PA) will serve as BEC. Mr. Dobbs has been working on the DDMT project as the region's project manager. DLA has received about twenty qualified applications for each of three advertised positions: GS-13 BEC/Manager, GS-12 project manager, and a GS-11 proj asst. The hires will be employees of the mid-east region (DDRE) in order to be protected from RIF at the ever shrinking DDMT.

DNESC continues to sell and remove fluorspar piles from Dunn field. The dust problem from stockpile removal has been Although the highly visible bauxite and fluorspar ore piles pose minimal (if any) environmental threats,

their removal presents evidence to the public that action is underway to clean up the site.

B. EBS/BCP

The Project Team met to discuss all of the review comments and responses on Woodward-Clyde's draft-final EBS. Woodward-Clyde was less than fully responsive to the initial set of comments. Problems with the Army's "mass production" EBS/BCP strategy for all BRAC 4 sites have been:

- The Seattle District of the Corps of Engineers did not provide for enough contractor manpower or time on-site to prepare an adequate EBS. At DDMT, DLA, at the behest of the BCT, invested an additional \$150,000 into the project. In the meantime, Seattle was insisting that the EBS would have been adequate without additional effort (NOT TRUE).

- The contractor is sometimes more responsive to the Seattle COE, as contracting agent, than they are to the BCT at DDMT. At Seattle's behest, they use a poor draft ASTM guidance. The contractor is also continually trying to apply Seattle's interpretations of the Army's latest guidances, even when the BCT disagrees or considers it inappropriate for DDMT. This process undermines the status of the BCT as the primary decision maker on the project.

- The contractor is compelled to adhere to national schedules that may or may not be appropriate for particular sites. This week the Seattle District COE, will present to the Army Environmental Center a document entitled FINAL-DDMT BCP, a document which will not yet have been sent to the BCT for review.

The Army will soon produce an impressive list of EBS/BCPs all submitted on schedule, with thousands of acres of property deemed, by them, to be transferrable. I fear, given my experience with the process, that most of these documents will not be worth a rat's behind. The only thing that saves the DDMT EBS is the extra

level of effort invested by DLA and hundreds of man-hours extra time invested by the project team.

C. RCRA Compliance

Region 4 RCRA compliance issued a 3008(a) order with a \$20,000 penalty for violations relating to the storage of incompatible hazardous waste. Spariosu was not informed before the order went out.

D. NEPA

EPA's NEPA office reviewed and approved without comment the Environmental Assessment for the interim lease to the Memphis Depot Redevelopment Authority.

E. Follow-up from the DERTF meeting:

1. The ECT has agreed that warning signs should be posted on Dunn Field fences. The wording has not yet been determined.

2. DLA contractor CH2M-Hill is preparing a workplan for sampling away from outfalls and drainage ditches with significant hits in the earlier fence-line study.

3. ATSDR is preparing a community health study plan. The study is to be performed as part of their Mississippi Delta Project.

IV. Community Relations Issues

DDMT hosted the DERTF meeting in September. The DERTF toured the site and attended a RAB meeting. Four members of the Memphis community, including Mr. and Mrs. Bradshaw spoke during the public comment session of the meeting.

Whitfield is helping the DDMT Concerned Citizens Committee (Mr & Mrs Bradshaw) prepare a TAG application. Spariosu and Whitfield have actively pursued better communication with the Bradshaws. The effort is beginning to show positive results.

The RAB met in September. Topics included the MDRA's preliminary reuse alternatives. The light industry alternative

will bring the most jobs but have the greatest impact and require the highest initial investment. Distribution industry has less environmental impact, but also fewer, lower paying jobs. One alternative considers housing in the southwest quadrant of the main installation. This has the lowest impact/fewest jobs.

Spariosu participated in an October 30 conference call with Tim Fields, Jim Woolford, Marsha Minter, Suzanne Wells, and Allison Abernathy, all of OSWER. The DDMT CCC (Kenneth and Doris Bradshaw) sent another letter to Tim Fields, this time charging DLA and TDEC with racism. These charges are groundless. Mr. Fields is concerned that a TAG only be awarded to a qualified group which is representative of the community. Spariosu offered that he did not think that the CCC is representative of prevailing attitudes in the community, which are much more realistic. Mr. Fields suggested that any TAG be awarded to the most representative group capable of administering the grant.

The CCC now has the services of Grover Hankins, an attorney who apparently penned the latest round of letters and the "Memphis Expose" the DDMT-CCC newsletter. The newsletter is replete with mistruths, misrepresentations of facts, and distortions.

(Prepared by Dann Spariosu, 404.562.8552)

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