

File: / 90, 300 C.G.

189

1

189

October 18, 1996

. .

Ms. Tiki Whitfield Community Relations Coordinator EPA - Region 4 Atlanta Federal Center 100 Alabama Street S.W. Atlanta, GA 30303-3104

Subject: Restoration Advisory Boards (RABs) Department of Defense, "Federal Register Publication" of Restoration Advisory Boards "Proposed Rule" dated Tuesday, August 6, 1996.

Dear Ms. Whitfield:

I have a few brief comments regarding the characteristics, composition, funding, and establishment of Restoration Advisory Boards (RABs). In reviewing the proposed Rules (9 pages in all) I find it very comprehensive and to the point. I would like to state for the record that I full concur with all conditions of the proposed Rule.

In the following paragraphs, I would like to illustrate to you how the "Restoration Advisory Board" at the Defense Distribution Depot Memphis is in full compliance with the proposed Rule, also, why it is very important to continue the funding of the "RAB" in order to accomplish its goals.

First of all, you must remember that the Defense Depot Memphis is located in the middle of a residential community and the population density from "zero" to "one" mile is 35%, and high school incomplete is 51%. When the "BRAC" Commission placed the Defense Depot Memphis on the closure list, the Lamar-Airways corridor was already a highly economically depressed area.

The composition of the "RAB" at the Defense Depot Memphis is quite diverse and balanced, (gender) male versus female, (race) Caucasian versus African American. I consider this diversity a characteristic that gives the Defense Depot Memphis an added advantage.

The Facility Co-Chair at the Defense Depot Memphis (RAB) is a Representative of the U.S. Department of Defense, also, we have a Co-Chair from the community.

The Defense Depot Memphis (RAB) meets on a regular basis, always the third Thursday of each month at 6:00 p.m., in the Commanders Conference Room (please read the enclosed copy of a Legal Notice) and the public is always invited. Also, in addition to our regular meetings in the past, we have met with citizens of the community at schools and community centers for either a public hearing or a town hall style meeting. Ms. Tiki Whitfield October 18, 1996 Page Two

In reference to obtaining a "Technical Assistance Grant" (TAG), the Defense Depot Memphis is very fortunate to have as a (RAB) member, Mr. Dan Spariosu from EPA Region-4, Mr. Jordan English, from the Tennessee Department of Environment and Conservation and Mr. Carter Gray, from Memphis/Shelby County Health Department Pollution Control Division. With their expert knowledge and technical assistance, the "RAB" at Memphis has managed to save the U.S. Department of Defense this added expense.

A complete file of documents and procedures is maintained in the Repository of Government Records at the Main Public Library (also at 3 branch locations) including a copy of the Minutes. Also, the "RAB" Coordinator, Ms. Sue Estes, publishes a quarterly newsletter for distribution to citizens of the community. In addition, an Environmental Hotline is maintained, phone (901) 775-4569.

One year ago on October 19, 1995, you gave a highly informative and professional presentation at our (RAB) Meeting regarding "Environmental Justice Study." This was based upon Presidential Executive Order 12898 of February 11, 1994, Federal Actions to address Environmental Justice in minority populations and low-income populations. Presently there is an active group of citizens in the Depot community seeking relief under Environmental Justice - they contend that the U.S. Department of Defense has encroached environmentally upon their community and has created a cancer cluster area. However, on November 8, 1995, the Agency for Toxic Substance and Disease Registry (ATSDR) issued a Public Health Assessment for USA Defense Depot Memphis - Memphis, Shelby County, Tennessee CERCLIS No. TN 4210020570, and based upon the findings of the Public Health Assessor, Mr. Jeff Kellam, there is no justification for the claim from the citizens.

On September 19, 1996, the "Defense Environmental Response Task Force," (DERTF) held a meeting in Memphis hosted by Ms. Pat Rivers, Deputy Undersecretary of Defense (Environmental Security). At the meeting, Ms. Cynthia A. Buchanan, Executive Director of the "Memphis Depot Redevelopment Agency," gave a highly informative and professional presentation or overview of "MDRA" goals. Ms. Buchanan expressed concern for the Depot community to improve quality of life by utilizing Depot facilities to meet the community's needs, as well as the employment of former Depot employees and local community residents.

Most impressive of all was the "Local Redevelopment Authority's" sensitive environmental concern of ensuring community public health and their sensitivity to residential property owners in the area. The most profound statement that Ms. Buchanan made to Ms. Pat Rivers was that "MDRA" wouldn't accept the transfer of any property until it was environmentally clean. I, personally, felt that this statement is the bottom line and should be accepted with great respect by the U.S. Department of Defense. Ms. Tiki Whitfield October 18, 1996 Page Three

Based upon the latest information from the final Environmental Assessment for Master Interim Lease for the Defense Distribution Depot Memphis property, the "MDRA's" Redevelopment Plan is expected to be available in early 1997, and the transfer of the property is likely to occur during or after 1998.

To address operation Unit-1 Dunn Field where in the past the U.S. Department of Defense has disposed of contaminated waste, along with the lethal chemical warfare material (mustard gas and lewisite gas). Technology will not be available until the year "2002" to safely extract this material. OU-1 is the main source of contamination and highly controversial among citizens of the minority community. This area must be cleaned up environmentally in order to prevent the contamination of the Memphis drinking water.

I do consider myself as a stakeholder in the Environmental Restoration Process because I worked there for the U.S. Department of Defense in a highly dedicated way from the late 1950's until the mid 1980's. Also, I consider it an honor to be a member of the Restoration Advisory Board.

In conclusion, the U.S. Department of Defense has an obligation and commitment to fund the Defense Depot Memphis "RAB" Board because during the months and even years ahead there is a lot of work remaining before we accomplish our goals. In the future, I request that you will be supportive of our "RAB" funding. Anytime you have any information relating to our Environmental Restoration Process, we welcome your presence at any future scheduled "RAB" meeting. I am,

Sincerely,

niso

John L. Garrison, Jr.

Enclosure: Legal Notice Minutes Newsletter

P.S. When the "Final Rule for RABs" is published in the Federal Register, I would appreciate it very much if you would mail me a copy.





