



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 205



DEFENSE LOGISTICS AGENCY
DEFENSE DISTRIBUTION DEPOT MEMPHIS
2163 AIRWAYS BOULEVARD
MEMPHIS, TENNESSEE 38114-5210



ON REPLY
REFER TO

DDMT-D

January 22, 1997

Kenneth Bradshaw and Doris Bradshaw
DDMT Concerned Citizens Committee
1454 East Mallory
Memphis TN 38106

Dear Kenneth and Doris Bradshaw,

This correspondence is in response to your three letters of December 30, 1996. Please note the Freedom of Information Act (FOIA) is the authority for providing the general public with government documents. We are therefore treating your request for documents under EPCRA as a FOIA request.

In your first letter you ask for a copy of the Administrative Record for Operable Unit (OU)-2, OU-3, and OU-4. The official administrative record is maintained at the Memphis/Shelby County Public Library, Main Branch, 1850 Peabody Avenue, and is available for inspection and copying at that location. (Information repositories are also located at the Cherokee Branch Library, Memphis/Shelby County Health Department, and the Mid-South Peace and Justice Center.) Alternatively, you may call (901)775-4568 and make an appointment to inspect and reproduce documents at DDMT.

You also state you wish to make a formal complaint against the Defense Depot for "combining groundwater contamination and buried hazardous waste for OU-1. The plume of contamination because of severity, should have its own separate designation." The methodology for the initial identification and designation of operable units at DDMT (attached) is described in the Site Management Plan (SMP) included with the Federal Facility Agreement. The OU designations represent the combined efforts of DDMT, the Tennessee Department of Environment and Conservation (TDEC), and the United States Environmental Protection Agency (EPA), Region IV. As noted in the SMP, the OUs may be redefined as more data are collected and evaluated. I am forwarding your letter to the pertinent individuals at TDEC and EPA for their consideration.

In your second letter you request copies of various environmental laws and DDMT's Resource Conservation and Recovery Act (RCRA) permit. The laws are in the public domain and available at the public libraries in the City of Memphis and at the University of Memphis law library. The DDMT RCRA permit is held by the State of Tennessee at the Memphis Field Office, 2510 Mt. Moriah Road. A copy of the RCRA permit is attached.


Your third letter contains several critical comments about the Restoration Advisory Board (RAB). You state DDMT is circumventing RAB guidelines as to membership diversity and balance, location of meetings, and in addressing non-restoration (BRAC) issues at the meetings.

The depot precisely followed DoD guidelines in converting the Technical Review Committee (TRC), which was established in February 1994, into a RAB in July 1994. The TRC consisted of representatives from DDMT, TDEC, EPA, Memphis City Council, Shelby County Commission, Memphis/Shelby County Health Department, Memphis Mayor's Office, Shelby County Mayor's Office, and a local environmental group. DDMT mailed announcements to neighborhood residents and posted public notices in the Commercial Appeal and Tri-State Defender newspapers advising of the establishment of a RAB and encouraging individuals to apply for membership from the surrounding community. Applications were forwarded to those who responded to these notices, and the TRC selected the first community representatives. The Depot did not participate in the selection process. The TRC chose applicants based on their community involvement and the location of their residence utilizing a city map to assure all surrounding communities were represented, and to ensure that individuals lived within a one mile radius of the Depot. In the past, you were personally handed a RAB application and encouraged to participate. However, the RAB never received an application from you. In the spring of 1996, the RAB advertised and mailed to neighboring residents a request seeking applications for new members. Based on the responses received, the RAB then chose four new members. These members were chosen because of their community involvement and their interest in the restoration of the Depot.

The location, time, and place of the RAB meetings were collectively decided by the members early in the organization process. The date, the third Thursday of each month, and the time, 6 p.m., were mutually chosen to allow working members a chance to leave work, attend the meeting, and finish as early as possible. The RAB chose DDMT because of its central location and availability of meeting space. The Depot staff is available to meet at any location chosen by the RAB.

In closing, I would encourage you to talk to your RAB community representative. These decisions are made by the RAB as a group and are subject to change based on the collective desires of the RAB members. Monthly RAB meetings are announced in both the Commercial Appeal and the Tri-State Defender, and the Board meetings are open to the public. I hope this letter addresses your concerns.

Sincerely,



M. J. KENNEDY
Colonel, USMC
Commander

Attachments

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE