



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 53



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File: 541.460.d  
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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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## REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

January 26, 1994

4 OPM/FAB/nmr

Mr. R. Wilson  
2163 Airways Blvd.  
Memphis, TN. 38114

Dear Mr. Wilson:

We are updating our "Federal Facilities Environmental Compliance Profiles for 1994. For your use in helping us update your profile we are enclosing the June 1993 information which was included last year. Please provide up-to-date information for each media by indicating whether the facility has a current or expired permit for the media, permit number and whether the facility is "in" or "out of" compliance. If the facility is "out of compliance" please indicate (1) reasons for "non-compliance," (2) dates of latest inspections and notices of violation, and (3) basic information regarding required actions needed by your facility to achieve and to meet compliance goals. If you are in doubt about your status, contact the appropriate state office having jurisdiction, or this office.

Our current records indicate the following to be the environmental contact's, name, address, phone and fax numbers.

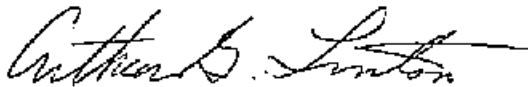
Mr. R. Wilson  
2163 Airways Blvd.  
Memphis, TN. 38114  
Phone 901-775-4910  
Fax 901-775-6241

Any necessary adjustment to this information is appreciated in keeping our data current.

I am requesting that you submit all update information by March 18, 1994, or sooner if possible. If you have any questions concerning this request, please call me or Ms. Nancy Redgate, of my staff, at (404) 347-3776. Please utilize any means which facilitates your submittal. We can accept any of the following: notes on the 1993 version, new hard copy, a 3" floppy using the Wordperfect program or facsimile to 404-347-5206.

You assistance in this effort will assure our success in producing a quality environmental compliance document for 1994 which accurately presents the status at your facility.

Sincerely yours,



Arthur G. Linton, P.E.  
Regional Federal Facilities Coordinator  
Federal Activities Branch

DATE: June 1993

NAME: Defense Distribution Region Central (DDRC)

LOCATION: Memphis, Tennessee

I.D.: TN971520570

MISSION: Major field installation of the Defense Logistics Agency (DLA). The facility receives, stores and distributes supplies for the U. S. military. Stockpiles consist primarily of food, clothing, petroleum, construction, industrial, medical and general supplies.

AREA: 642 acres.

POPULATION 2800

COMPLIANCE STATUS

AIR: In compliance. Last inspection by Memphis and Shelby County Health Department on Jan. 12, '93. Air pollution operating permits issued in November 1989. Additional permits issued in January 1991. The permitted sources include spray paint booth operations, a sand blasting operation, an incinerator used for limited burning of classified information, boilers and space heaters, and underground petroleum storage tanks.

WATER: In compliance with drinking water quality standards. Water is obtained from City of Memphis. All treatment is accomplished by Memphis Light, Gas and Water Division. The State of Tennessee is the permitting agency which routinely samples and analyzes to ensure drinking water quality standards are met.

WASTEWATER: In compliance. Sewage system is connected into the city system. A Sewer Use Agreement was issued in November 1989. There are no known problems concerning wastewater situation. Last samples were taken and analyzed in March 1991. Miscellaneous sources are permitted in March 1991. Miscellaneous sources are permitted with NPDES Permit Number TN0022322. The NPDES permit will expire in September 1993. Last analyses reported to the state showed suspended solids higher than the permit limits. DDMT is studying drainage systems and attempting to identify erosion problems potentially causing high suspended solids levels.

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Funds are currently being acquired to implement some of the projects. DDMT has implemented a temporary action to reduce suspended solids.

UST: Currently, there are only two regulated storage tanks at DDMT. Since the remaining underground tanks were placed into service in the early 1980's, they will be required to be upgraded by December 1993. There are a number of underground storage tanks at DDMT for storage of heating oil for consumptive use on the premises, and therefore, are not regulated. DDMT is waiting for funds to remove an underground fuel oil tank and to upgrade other underground tanks.

RCRA: In compliance. DDMT volunteered to the State of Tennessee, Part A and Part B applications. The Part B RCRA Permit was issued on September 28, 1990. DDMT was last inspected by the State of Tennessee on September 23, 1992. At the time of inspection, no violations were noted. A conforming Storage Facility design was completed and submitted with the Part B application. However, the size of the Conforming Storage Facility has been decreased by Defense Reutilization and Marketing Service (DRMS) Headquarters. No construction will start until design is returned to DDMT and approved by the State. The RCRA permit will be modified after approval from the State to reflect final design.

CERCLA: DDMT's contractor, Engineering Science Inc., has submitted an Interim Remedial Measures (IRM) Work Plan to USEPA regarding the Follow-on Investigation for Defense Distribution Region Central. Also, DDMT has submitted to the USEPA and the State of Tennessee the Remedial Investigation/Feasibility Study and is waiting for comments. Next, the contractor will respond to any comments by the regulators regarding the Draft Final IRM Work Plan and the Draft RI/FS Follow-on Work Plan. DDMT is classified as a NPL site.

TOXICS: Oils, solvents, paints, pesticides, cleaners, and thinners are stored per the Installation Spill Contingency Plan (ISCP & SPCCP) as approved by the State of Tennessee and DLA Headquarters. All PCB contaminated transformers were removed from service

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and transported by contractor for disposal. Non-PCB contaminated transformers have replaced those which contained PCBs.

#### POLLUTION PREVENTION

The current solid waste program is working in conjunction with a recycling program to minimize the disposal of reusable scrap materials. Recycling minimizes wastes sent to sanitary landfills and allows for better utilization of our natural resources. Currently DDMT is recycling computer paper, cardboard, aluminum cans, scrap metals, wooden pallets, and used oil and battery acid.

DDMT state-of-the-art hazardous materials warehouse was designed to handle all types of hazardous material, which effectively allows separate warehouse storage under one roof. The adjacent recouping facility continues to save the DLA money and prevents pollution by repacking damaged or leaking containers. The establishment of the recoupment facility contributes largely to DDMT's waste minimization program. If a container is deteriorating, corroding or leaking, the material can be repacked into approved containers and placed back into stock rather than being disposed by contractor as hazardous waste. Also proper storage and handling techniques are emphasized for pollution prevention at DDMT.

DDMT is about to complete construction of a covered Flammable Storage Facility for the storage of 55 gallon drums of flammable liquids. This new construction will minimize the potentially deleterious effects to the environment caused by storage of products in containers exposed to the weather.

#### ENVIRONMENTAL AUDIT

The most recent environmental audit was performed by the United States Army Environmental Hygiene Agency in October, 1992

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FEDERAL FACILITY AGREEMENT

DDMT is presently in negotiations with EPA and the State on a Federal Facility Agreement which should be completed in late 1993.

PROBLEM AREAS

The need exists to construct a Conforming Storage Facility at DRMO. The redesign for this project has not been finalized by DRMS and no construction start date has been established. Design is being modified to meet local and Federal Fire Codes. Redesign started March 1993.

ACTION NEEDED

DRMO has inadequate storage for hazardous materials and waste. DRMS Headquarters will make corrections to the plans and specifications for the Conforming Storage Facility and incorporate DLA Memphis and the City of Memphis Fire Department comments.

CONTACT: Randy Wilson - 901-775-4910  
FAX - 901 775-6241

Hazardous Waste Site Listed Under The  
Comprehensive Environmental Response, Compensation, and Liability  
Act of 1980 (CERCLA) (SUPERFUND)

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MEMPHIS DEFENSE DEPOT

Memphis, Tennessee

Conditions at Proposal (February 7, 1992): The Memphis Defense Depot is comprised of 642 acres in south central Memphis, Shelby County, Tennessee. It is located in a mixed residential/commercial/industrial area. The site consists of two contiguous sections: Dunn Field, an open storage and burial area of about 60 acres; and the main installation. The site is currently known as the 'Defense Distribution Region Central.'

In operation since 1942, the depot is a major field installation of the Defense Logistics Agency. Its primary function is to provide materiel support (including clothing, food, medical supplies, electronic equipment, petroleum products, and industrial chemicals) to all U.S. military services and some civilian agencies. The depot has conducted numerous operations dealing with hazardous substances.

A total of 75 waste disposal areas and other areas of concern have been identified at the facility, most of them in Dunn Field. Among the wastes disposed of, according to the Department of Defense (DOD), are oil, grease, paints, paint thinners, methyl bromide, and pesticides. In addition, stored materials have reportedly spilled and leaked at the main installation, as well as at Dunn Field, contaminating soil with volatile organic compounds, metals, PCBs, polynuclear aromatic hydrocarbons, and pesticides.

Shallow ground water is contaminated with arsenic, lead, chromium, nickel, tetrachloroethane, and trichloroethane, according to tests conducted in 1989 by DOD. An estimated 154,300 people obtain drinking water from public and private wells within 4 miles of the site. The nearest well, within 0.5 mile of hazardous substances at the depot, also provides water for commercial food production. These wells draw from deeper ground water, which is not now contaminated.

There was recreational fishing on Lake Danielson, a 4-acre man-made lake on the facility, until 1986, when DOD tests found pesticides (DDD, DDE, dieldrin, and chlordane) and PCBs in lake sediment and fish tissue. The tests also found cadmium, chromium, lead, and zinc in lake sediments.

In August 1990, the depot submitted the results of a 2-year environmental study to EPA. As a result of that study, EPA requested that the depot complete its study characterizing contamination at the depot, and take interim measures to expedite cleanup of a plume of contaminated ground water underneath a portion of the depot. The additional work was conducted under a permit to store hazardous materials, issued in September 1990 under Subtitle C of the Resource Conservation and Recovery Act.

Status (October 1992): On February 19, 1992, EPA requested that the depot, the Tennessee Department of Environment and Conservation, and EPA commence negotiations of a Federal Facilities Agreement under CERCLA Section 120. The depot has submitted a draft agreement, which is under review. A formal negotiations meeting is scheduled for the fall of 1992.

Description of the site (release) is based on information available at the time the site was scored. The description may change as additional information is gathered on the sources and extent of contamination. See FR 5600, February 11, 1991 or subsequent FR notices.)

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U.S. Environmental Protection Agency Remedial Response Program



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