

# THE MEMPHIS DEPOT TENNESSEE

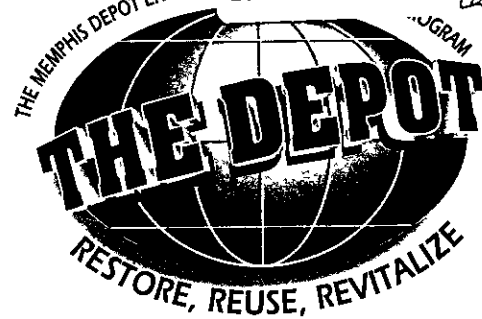
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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 610

# EnviroNews

Jan./Feb. 2001



## CWM UPDATE: Soil Samples Confirm Location of 1946 Neutralization Pit

The U.S. Army Corps of Engineers and its contractors have begun the final phase of the chemical warfare materiel (CWM) removal project at Dunn Field. At the end of November 2000, soil sampling and excavation began inside the Vapor Containment Structure (VCS) at the site known as the 1946 mustard neutralization pit.

In 1946, mustard agent was drained from 29 bomb casings and neutralized with a bleach solution then covered with soil. On November 29, 2000, soil samples were collected at Site #24B – which historical records and geophysical testing have identified as the 1946 mustard neutralization pit – and indicated low levels of mustard in the soil. These soil samples confirm the progress of the removal action and the accuracy of the historical records and field investigation.

All excavation and removal activities continue to take place inside the VCS. The VCS is designed to contain any material or vapors that are uncovered and to filter the air during the excavation, thus providing maximum protection for

the workers and the community. Since the CWM program began at Dunn Field in April 2000, there has been no release outside the VCS of mustard, its breakdown products or other chemical warfare agents at any of the excavation sites. Any recovered CWM will be transported according to the approved Site Safety Plan.

"The VCS at Dunn Field is constructed to contain any and all vapors that could potentially be released and remove them from the air through four filtering systems," said Mr. Clyde Hunt, CWM On-site Coordinator for the U.S. Army Corps of Engineers. "After all, safety remains our number one priority, and the VCS provides an increased measure of safety and protection for our community, our workers and the environment."

The CWM project is scheduled to continue through May 2001.

Weekly CWM briefings are held each Wednesday at 10:00 a.m. in the Memphis Depot's Community Outreach Room in Building 144 at the Memphis Depot Business Park to update the community

## UPCOMING RAB MEETINGS

The RAB includes community members who review proposed plans and actions and provide input on the environmental cleanup activities.

The next  
RAB meetings  
are Jan. 18th &  
Feb. 15th, 2001

The January RAB meeting will be held at Hamilton Elementary School, 1378 Ethyl St. The February meeting will be held in the "J" Street Cafe at the Memphis Depot Business Park. Both meetings will begin at 6 p.m. □

on the progress being made at Dunn Field. For more information on the CWM briefings, call our information line at (901) 544-0613 or access our website at [www.ddc.dla.mil/memphis](http://www.ddc.dla.mil/memphis).

## Safety First: Depot contractors win safety awards

The Memphis Depot Caretaker Division congratulates its cleanup project contractor, Sverdrup Civil, Inc., for winning the Celebrate Safety Award in recognition of the company's commitment to a safe and healthy work site.

Sverdrup received the top award from the Tennessee Area Office of the U.S. Army Corps of Engineers for completing the cleanup project at the old paint shop and maintenance area of the Main Installation with no injuries. The Corps' Tennessee Area Office also considered for the award eight other environmental and construction projects of comparable

size completed within the last quarter of fiscal year 2000.

Sverdrup and its subcontractors completed 25 working days and approximately 5,420 hours of work without an accident. Subcontractors on the project included Solutions to Environmental Problems, Inc. (STEP) who received the Small Business Administration's Tennessee District Office Minority Small Business of the Year award in September 2000. □

**Congratulations  
Sverdrup and STEP!**



Soil was removed and disposed of as part of the completed cleanup project at the old paint shop and maintenance areas of the Main Installation.

# 2000 Reflections on

Last year, the Memphis Depot began an important phase of the ongoing environmental cleanup program with the start and/or completion of a number of short- and long-term activities on the Main Installation and Dunn Field. These activities have moved the Memphis Depot and the community closer to the goal of safely restoring the Depot property for productive reuse

- January 2000 – The Base Realignment and Closure (BRAC) Cleanup Team (BCT) finalized the Main Installation (MI) Remedial Investigation Report, and the Depot provided the document for public review. This report provided the BCT with an indepth scientific analysis of the environmental conditions at the MI and the potential risks to human health and the environment. The BCT used this information to identify areas that required cleanup. The Depot made the document available to the public in its four Information Repositories.
- February 2000 – The Depot provided the public with the chemical warfare materiel (CWM) removal project Site Safety Submission that was reviewed and approved by the Department of Army and Department of Health and Human Services before the CWM removal work began.
- March 2000 – The Depot held a Community Information Session (CIS) and Media Day to update the community about the Depot's CWM removal project. The project began with construction of a vapor containment structure (VCS) designed to protect the community during CWM removal activities. About 25 community members and media from every television affiliate in Memphis attended.

- May 2000 – The CWM project team began removal activities at the first of three suspected CWM disposal sites at Dunn Field. The Depot began weekly briefings to update the community on the progress of the CWM removal project.
- May 2000 – Sverdrup Civil, Inc. began the cleanup project at the old paint shop and maintenance area in the southwest corner of the MI.
- August 2000 – Sverdrup completed the cleanup project at the old paint shop and maintenance area of the MI.
- August 2000 – The BCT finalized the Main Installation Feasibility Studies for Groundwater and Soil, which evaluated different cleanup alternatives, and the Main Installation Proposed Plan, which presented the BCT's preferred cleanup alternative for the Main Installation. The Depot provided the documents to the public for review and began the public comment period. The Depot also held a public comment meeting to present the Main Installation Proposed Plan.
- September 2000 – The CWM project team completed removal activities at the first suspected CWM disposal site at Dunn Field and began work at the second suspected CWM disposal site.
- October 2000 – The CWM project team constructed a second VCS at the third suspected CWM disposal site at Dunn Field.
- October 2000 – Additional monitoring wells were installed at selected locations on Dunn Field and in neighborhoods around the Depot as part of the Dunn Field Remedial Investigation.
- December 2000 – The CWM project team completed removal activities at the second CWM disposal site at Dunn Field. The CWM removal project entered its final phase as removal work began at the third suspected CWM disposal site. □

Representatives from the EPA and TDEC helped environmental cleanup team members from the Depot and Corp of Engineers and their contractors at the ribbon-cutting for the launch of chemical warfare materiel removal project on Dunn Field.



One of the 25 empty 500-kg bomb casings that have been uncovered at Site #24-A.



## You Asked...

At the July 2000 meeting of the Restoration Advisory Board (RAB), RAB and community members asked a number of questions about the Depot's environmental program. Here are some of these questions. More can be found in the Q&A section of the Depot's website at [www.ddc.dla.mil/memphis](http://www.ddc.dla.mil/memphis)

### Q. How did you choose samples to make sure you identified contaminated areas?

- A. The first part of the Remedial Investigation process is to identify, through historical document searches and interviews with former employees, areas where compounds used in past activities may have affected the environment such as spray paint or sand blast areas, hazardous material storage areas and vehicle maintenance areas. Sampling plans are then prepared with input and approval from the Environmental Protection Agency (EPA) and the Tennessee Department of Environment and Conservation (TDEC). Sampling procedures dictate that the first set of samples be collected from the location considered to have the highest possibility to receive a release or a spill within each area where past activities may have impacted the environment. Once a sample detects a compound, additional sampling moves outward in a circular pattern from

areas where the compound is found to define how far the compound is distributed. Additionally, in response to a suggestion from EPA and TDEC, samples were collected from random locations in an effort to identify any contaminated areas that may not have been included in historical documents or mentioned by former employees.

### Q. What do you mean by cleanup?

- A. According to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), cleanup means those actions taken to prevent or minimize the release of or exposures to hazardous substances so that the substances do not move and cause substantial danger to present or future public health or the environment. This includes, but is not limited to, perimeter protection using fences, covering contaminated soil with clay, removing hazardous substances and associated contaminated materials, establishing institutional controls such as deed restrictions against residential development, and monitoring reasonably required to assure EPA and TDEC that such actions protect the public health and the environment.

### Q. Is everything going to be cleaned up?

- A. All the areas of the Depot that present unacceptable risks to industrial workers will be cleaned up. The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the 1995 EPA Land Use Guidance

# Looking toward the future

In 2001, the Memphis Depot will conduct several activities as part of the ongoing environmental cleanup and property transfer programs that will continue moving the Memphis Depot and the community closer to the goal of safely restoring the Depot property for productive reuse:

- The Defense Logistics Agency (DLA) and the U.S. Environmental Protection Agency (EPA) expect to sign the Record of Decision in April 2001 for the cleanup of the Main Installation. The Depot will provide the signed document to the public in its Information Repositories
- The Chemical Warfare Materiel (CWM) project team will complete the safe removal of CWM from Dunn Field. The CWM project team expects the removal project to be completed by May 2001
- The Depot's environmental investigation contractor, CH2M Hill, will complete groundwater and soil sampling for the Dunn Field Remedial Investigation (RI). The Base Realignment and Closure (BRAC) Cleanup Team (BCT) expects to finalize the Dunn Field RI Report in August 2001. This report will provide the BCT with an indepth scientific analysis of the environmental conditions at Dunn Field and the potential risks to human health and the environment. The BCT will use this information to identify areas that require cleanup. The Depot will provide the document to the public in its Information Repositories
- The BCT expects to finalize the Dunn Field Feasibility Study, which will evaluate different cleanup alternatives, in September 2001. The BCT expects to finalize the Dunn Field Proposed Plan, which will present the BCT's preferred cleanup alternative for Dunn Field, in December 2001. The Depot will provide the documents to the public in its Information Repositories for review and expects to begin the public comment period in January 2002
- The Memphis Depot expects to complete a Finding of Suitability to Transfer (FOST) for the property and buildings in Parcel 1. This area includes Building 144, the security guard buildings and the parking lots adjacent to Building 144 on Airways Boulevard. After the Department of the Army signs the FOST, the property will be transferred to the Depot Redevelopment Corporation for productive reuse

## What to expect in 2001 and beyond

- The BCT expects to finalize the Main Installation Remedial Design (RD) in January 2002. The RD includes plans for conducting the preferred cleanup alternative for the Main Installation
- The BCT expects Remedial Action (RA) to begin in January 2002 on the areas of the Main Installation identified for cleanup in the Main Installation Record of Decision
- DLA and EPA expect to sign the Record of Decision for the cleanup of Dunn Field in May 2002. The Depot will provide the signed document to the public in its Information Repositories.
- The BCT expects to finalize the Dunn Field Remedial Design (RD) in September 2002. The RD includes plans for conducting the preferred cleanup alternative for Dunn Field
- The BCT expects the RA to begin in September 2002 on the areas of Dunn Field identified for cleanup in the Dunn Field Record of Decision □

### A Fond Farewell!

In December, the Memphis Depot Caretaker Division and the Depot's environmental team said goodbye to Shawn Phillips, who has served as the Depot's Base Realignment and Cleanup (BRAC) Environmental Coordinator (BEC) since 1998. Mr. Phillips has accepted a position with the U S Army Corps of Engineers in Memphis

Mr. John DeBack, Base Transition Coordinator at the Depot, will serve as facility co-chair of the Restoration Advisory Board (RAB) until further notice.

For more information, please contact John DeBack at 901-544-0617 □



state that the site should be cleaned up to the reasonably anticipated future land use. The Depot, EPA and TDEC recognize the Depot Redevelopment Corporation (DRC) as the entity that sets what the reasonably anticipated future land use is, which in this case is light industrial and recreational use. In 1998, the Depot cleaned up the housing area to residential standards and the cafeteria area to industrial standards. In 2000, the Depot cleaned up the old paint shop and maintenance area in the south-west corner of the Main Installation to industrial standards

#### Q. Does the risk assessment take into account long-term exposure?

- A. Yes. Since the human body will naturally defend itself against harmful substances throughout its lifetime, toxicity factors are developed using animal and human studies that mimic a lifetime of exposure. The Risk Assessment for the Depot evaluated long-term exposure to workers and hypothetical future residents assuming exposures would add up over time. Scientific evidence suggests that the body develops natural defense mechanisms to fight the effects of exposure to low levels of chemicals.

#### Q. Is there any long-term monitoring of residents planned to safeguard health?

- A. According to CERCLA, any cleanup must protect public health and the environment, now and in the future, by preventing or minimizing the

release of or exposure to hazardous substances. To ensure this, CERCLA requires that the cleanup remedy is reviewed periodically, at least every five years. The proposed cleanup alternative for groundwater includes a monitoring program to make sure the groundwater remedy is working properly. As long as the conditions and requirements set forth in the Record of Decision for the cleanup alternatives continue to be met, the remedy is considered protective of current and future public health.

#### Q. Why was soil removed at the housing, cafeteria and paint shop areas if there was no threat?

- A. DRC identified the housing area, the cafeteria area and the paint shop/maintenance area of the Main Installation as high-priority areas for redevelopment and reuse. At the time of consideration for early transfer, a Risk Assessment had not yet been conducted at these areas. CERCLA allows for early removals if the extent of the contamination has been identified and it would be financially advantageous to do a removal action rather than continue studying the area. Sampling at these areas identified the extent of contamination was above screening levels, so the Depot decided to voluntarily remove soil and structures from these areas to facilitate early transfer. □

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## DATED MATERIALS - PLEASE DELIVER THIS IMMEDIATELY

### FOR YOUR INFORMATION.....

The Information Repositories are at the following locations:

The Depot, 2163 Airways Blvd, Bldg 144,  
Memphis, TN (901) 544-0613

The Community Outreach Room is located in Building  
144 Please call ahead for an appointment to ensure  
that we are available to help you

Memphis/Shelby County Health  
Department, Pollution Control Division  
814 Jefferson Ave., Memphis, TN  
(901) 576-7775

The Pollution Control Division is open Monday  
to Friday from 7 30 a m to 4 30 p m

Memphis/Shelby County Public Library,  
Cherokee Branch, 3300 Sharpe Ave.,  
Memphis, TN (901) 743-3655  
The Cherokee Branch is open Monday to Wednesday  
from 10 a m to 6 30 p m, Thursday from noon to  
6 30 p m, and Saturday from noon to 6 p m

Hillview Village Neighborhood  
Network Systems, 2119 Alcy Rd.,  
Memphis, TN 38114 (901) 743-0500  
The office is open Monday to Friday from  
8 00 a m to 5 00 p m

## HOW TO REACH US....

If you have any questions or comments about the Depot's environmental cleanup program, please feel  
free to contact any one of the following:

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Visit the Depot's website at [www.ddc.dla.mil/memphis](http://www.ddc.dla.mil/memphis)



EnviroNews is published by the Memphis Depot to  
update the public on the environmental cleanup  
program. If you have comments, questions, or  
suggestions for future articles, please call  
Ms. Alma Black Moore at (901) 544-0613.

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**ADMINISTRATIVE RECORD**

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