



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 62

Jun 94
(Date Estimated)

FACT SHEET

DEFENSE DEPOT
MEMPHIS, SHELBY COUNTY

SUPERFUND SITE ID 79-736

Site History

The Defense Depot, Memphis is situated on 642 acres of land in Memphis, Shelby County, Tennessee. It is located in a mixed residential/commercial/industrial use area approximately 4 miles southeast of downtown Memphis.

Past storage, disposal and treatment activities have created source areas of contamination at several locations. Dunn Field, at the extreme northern part of the facility, is a former burial site for a variety of hazardous and non-hazardous substances. Hazardous substances present include solvents and metals. Other areas of the facility have environmental problems related to historical pesticide use and wood treatment.

A Defense/State Memorandum of Agreement (DSMOA) and a Federal Facilities Agreement (FFA) have been finalized and signed. Most recently, the Depot has been named on the Department of Defense (DoD) Base Realignment and Closure (BRAC) list of facilities listed for full Closure. Pursuant to the BRAC Act of 1990, the BRAC Cleanup Team (BCT) is to implement the BRAC Cleanup Plan (BCP) which is to evaluate environmental concerns including any necessary restoration before the DoD ceases complete operation of the facility.

Regulatory Status

On May 23, 1985, the Memphis Defense Depot was added to the Division of Solid Waste Management (now Superfund) List of Inactive hazardous Substance Sites. Although the Department of Defense was in operation at the time, the site was added to the list because there were inactive disposal areas within the site boundaries.

The Memphis Defense Depot is also under HSWA-TNHW permit #053 with the Division of Solid Waste Management pursuant to the Solid Waste Disposal Act, as amended (42 USC § 6901 et seq., commonly known as RCRA) and regulations promulgated thereunder by the U.S. EPA. This permit requires the investigation of any releases of hazardous waste or hazardous constituents from any Solid Waste Management Units (SMUs). Currently, investigation of these sites are underway through a joint effort of the TN Division of Solid Waste Management, EPA and the TN Division of Superfund (DSF). The DSF is currently under a Cooperative Agreement with EPA to perform the role of oversight agency for investigation and cleanup of the Defense Depot.

Reasons For Delisting

In accordance with amendments (May, 1994) to the Superfund statute TCA 68-212-206(e) "... An inactive hazardous substance site which has been identified as a solid waste management unit and is subjected to a requirement for investigation and/or corrective action pursuant to § 3004(u) of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §6901, et.seq.) and which requirements are included in a facility permit issued pursuant to RCRA shall not be proposed by the commissioner for addition to the list of sites eligible for investigation, identification, containment, and cleanup under this part. An inactive hazardous substance site listed under this part that subsequently becomes subject to a requirement described under § 3004(u) (42 U.S.C. § 6901, et. seq.) shall be removed from the list by the board pursuant to a proposal which shall be made by the commissioner."

Conclusion

The Division of Superfund in compliance with the above referenced act proposes to remove these sites from the DSF promulgated list. Removal from the Tennessee list will not affect the current Cooperative Agreement between the DSF and EPA for continuing the current investigation. The DSF will still be involved as the State oversight agency until all environmental matters of this nature are brought to a satisfactory conclusion.

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