



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 752



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File: 660.420.000
J.D. 752

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
MEMPHIS ENVIRONMENTAL FIELD OFFICE
SUITE E-645, PERIMETER PARK
2510 MT MORIAH ROAD
MEMPHIS, TENNESSEE 38115-1520

July 17, 2003

CERTIFIED MAIL NO 7002 2030 0003 1811 3265
RETURN RECEIPT REQUESTED

Mr John DeBack
DLA Environmental Coordinator
Memphis Depot Caretaker Division
2163 Airways Boulevard, Building 144, Room 140
Memphis, TN 38114
Collierville, TN 38017

RE Hazardous Waste Inspection
Defense Distribution Depot Memphis
2163 Airways Boulevard
Memphis, TN 38114
TN4 21-002-0570, TNHW-053

Dear Mr DeBack

This letter confirms the observations made by the Division of Solid Waste Management (Division), Memphis Environmental Assistance Center (MEAC), personnel during the hazardous waste inspection at the above-referenced facility. The inspection was conducted on October 1, 2002.

Enclosed is the hazardous waste inspection report indicating no violations were observed at the time of the inspection. If you have questions concerning this letter or the enclosed report, please do not hesitate to contact me at (901) 368-7952.

Sincerely,

A handwritten signature in cursive script, appearing to read "Herb Nicholson".

Herb Nicholson
State of Tennessee
Division of Solid Waste Management
Memphis Environmental Assistance Center

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Enclosure Hazardous Waste Inspection Report

- c DSWM/NCO, Robert Nakamoto, Compliance Support Section, w/enclosure
- DSWM/NCO, Central File, w/enclosure
- DSWM/MEAC, Inspection File, w/enclosure
- DSWM/MEAC, Philip Davis, w/enclosure
- DSWM/MEAC, Herb Nicholson, w/enclosure
- EPA Region IV, Hector Danois, w/enclosure
- DSF/MEAC, Jordan English, w/enclosure

HAZARDOUS WASTE INSPECTION REPORT

Defense Distribution Depot Memphis

• SITE/PHYSICAL LOCATION:

Defense Distribution Depot Memphis
2163 Airways Boulevard
Memphis, TN 38114
TN4 21-002-0570
Permit TNHW-053
County. Memphis

• PRIMARY CONTACTS:

Mr. John DeBack
DLA Environmental Coordinator
Memphis Depot Caretaker Division
2163 Airways Boulevard
Memphis, TN 38114
Telephone (901) 544-0622
Fax (901) 544-0623

• DATE AND START-TIME OF INSPECTION:

Tuesday, October 1, 2002, @ 1000 CDT

• INSPECTION PARTICIPANTS:

Mr John DeBack, DLA Environmental Coordinator, Memphis Depot Caretaker Division
Mr Jason Simpson, TDEC/DSWM/MEAC, Hazardous Waste Program
Mr Herb Nicholson, TDEC/DSWM/MEAC, Hazardous Waste Program

• REPORT PREPARED BY:

Herb Nicholson
Division of Solid Waste Management
Memphis Field Office
Suite E-645, Perimeter Park
2510 Mt Moriah Rd
Memphis, TN 38115-1520
Telephone (901) 368-7952
Fax (901) 368-7979

• **PURPOSE OF INSPECTION:**

This unannounced compliance evaluation inspection (CEI) was conducted to evaluate Defense Distribution Depot Memphis's (Depot) compliance with applicable requirements of the rules and regulations promulgated pursuant to the Hazardous Waste Management Act, T.C.A. 68-212-101 et seq., and the Hazardous Waste Reduction Act, T.C.A. 68-212-301 et seq. The previous inspection conducted by the Division was September 30, 1999

• **FACILITY DESCRIPTION:**

The Depot site occupies an area of 642 acres in south central Memphis, Tennessee. The site is bordered on the north by Dunn Avenue, by Perry Road on the west, Ball Road on the south and Airways Boulevard on the east. The site operated as a warehousing and distribution facility for material used by the military from around 1942 to September 1997.

A hazardous waste permit (TNHW-053) was issued to the Depot on September 28, 1990. The permit (effective for 10 years) allowed the facility to construct a storage unit to store 154,440 gallons of hazardous waste. However, the hazardous waste storage unit was never constructed at the Depot. As a result, hazardous waste was never stored at the Depot under conditions stated in permit TNHW-053.

The operational (container storage) portion of the permit was terminated by the Division on October 22, 1998. The termination action did not affect portions of permit TNHW-053 pertaining to corrective action requirements. Since the corrective action portion of this permit was valid until September 28, 2001, the Depot was required to submit a new Part B application on or before March 30, 2001, in accordance with Rule 1200-1-11-07(2)(e) and Rule 1200-1-11-08(3). However, since the Division did not receive the renewal documents by March 30, 2001, the Division submitted a Notice of Violation (NOV) dated May 5, 2001, to the Depot for failure to submit a timely renewal of the corrective action portion of the permit. The Division subsequently submitted a letter (dated June 19, 2003) to the Depot stating that the NOV will be considered resolved by TDEC upon receipt of a complete Part A and Part B permit renewal application.

Currently, soil and ground water remediation activities are being conducted on the property with oversight from the US Environmental Protection Agency (EPA) and the Division of Superfund, MEAC.

• **INSPECTION FINDINGS:**

Mr. DeBack was notified of the purpose of the inspection. Mr. DeBack informed the MEAC that the Depot was closed on September 30, 1997. Mr. DeBack stated that the Depot property, other than the Dunn Field portion, was leased to the City of Memphis.

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around October 1, 1997. Mr DeBack indicated that tenants currently occupy around 48% of the leased portion of the property

Mr DeBack informed the MEAC that no hazardous waste (from former Depot operations) was stored on site During the site visit, the MEAC inspected a portion of the property that was formerly utilized as a less-than-90-day hazardous waste storage area (storage area) The former storage area was located in a building leased to Klink Brothers Ice Cream Corporation No containers of hazardous waste were observed in this area at the time of the inspection

- **VIOLATIONS:**

During this compliance evaluation, no violations were identified

- **REMARKS/RECOMMENDATIONS:**

The University of Tennessee Center for Industrial Services can provide technical assistance at no or little cost to the Depot The local contact is Ms Debra Dupree at (901) 387-1652

SIGNED: Herb Nicholson DATE 7/18/03
Herb Nicholson, Geologist, CHMM
State of Tennessee
Memphis Environmental Assistance Center
Division of Solid Waste Management

REVIEWED: Philip Davis DATE 07/18/03
Philip Davis, Environmental Field Office Manager
State of Tennessee
Memphis Environmental Assistance Center
Division of Solid Waste Management

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