



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 825

AET 825

Finding of Suitability to Transfer 4 (FOST)

Defense Distribution Center (Memphis)
Dunn Field

March 2005

Subparcels 36.12, 36.13, 36.14, 36.24, 36.25, 36.26, 36.27, 36.30, 36.31
and 36.32

PREPARED FOR



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DEPARTMENT OF THE ARMY
HAMPTON FIELD OFFICE, ARMY BASE REALIGNMENT AND CLOSURE
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REPLY TO
ATTENTION OF

DAIM-BD-H

MAR 04 2005

MEMORANDUM FOR Assistant Chief of Staff for Installation Management, 600 Army
Pentagon, Washington, D.C. 20310-0600

SUBJECT: Finding of Suitability to Transfer at Former Memphis Depot – Dunn Field

1. Enclosed for your records: Finding of Suitability to Transfer 41.17 acres at the Former Memphis Depot. The document received Installation, Regulatory, Public, and Hampton Field Office (HFO) legal and environmental review. It is signed by the Director of the BRAC - Hampton Field Office.
2. Hampton – BRAC field office point of contact is Ms. Robin Mills, DSN 680 – 3846 or commercial (757) 788 – 3846.

A handwritten signature in cursive script, reading "Thomas E. Lederle", is positioned above the printed name.

THOMAS E. LEDERLE

Director, Base Realignment and Closure
Hampton Field Office

CF: (w/encls)
HQDA (DAIM-BD/ Larry Beach)
DLA BRAC Office, (DSS-DB/Jeanne Master)
CESAM-RE-MD (Harold G. Duck)

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**FINDING OF SUITABILITY TO TRANSFER
(FOST)**

Memphis Depot – Dunn Field

Subparcels 36.12, 36.13, 36.14, 36.24, 36.25, 36.26, 36.27, 36.30, 36.31 and 36.32

March 2005

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of certain property (Subparcels 36.12, 36.13, 36.14, 36.24, 36.25, 36.26, 36.27, 36.30, 36.31 and 36.32) at Former Defense Distribution Depot Memphis, Tennessee (Depot), currently known as the Defense Distribution Center (Memphis), for transfer as a public benefit conveyance (PBC) through the Department of Interior to the Memphis Depot Redevelopment Cooperation for recreational use and through the Department of Transportation to the Memphis Depot Redevelopment Cooperation for light industrial and commercial use consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h), Department of Defense policy and the Depot Redevelopment Corporation's Memphis Depot Redevelopment Plan. In addition, the FOST includes the CERCLA Notice, Covenant, and Access Provisions and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer (Enclosure 1)

2. PROPERTY DESCRIPTION

The proposed property proposed for transfer consists of approximately 41.17 acres, which includes open grassed areas, paved and gravel roads, and railroad tracks.

Low level residual contamination of herbicides, pesticides, and pentachlorophenol remains in surface and subsurface soils at the property proposed for transfer. Residual soil contamination levels do not present unacceptable risk to human health or the environment for the proposed light industrial, commercial and recreation uses. The Dunn Field ROD (April 2004) designated the property as available for unrestricted use with no further action required. Overall human health risks and non-carcinogenic hazards to potential residents, recreational users and industrial or commercial workers are within acceptable limits for carcinogenic and non-carcinogenic end points.

The natural habitat at Dunn Field is very limited to non-existent. Occasional terrestrial animals visiting the facility or living nearby are not subject to a significant threat from the site media. A screening level Ecological Risk Assessment conducted across Dunn Field indicated little potential for significant ecological impacts or adverse effects to wildlife. No ecological contaminants of concern were identified at the facility. The land uses on Dunn Field are expected to remain unchanged in the future; therefore, the potential for wildlife exposure is low. The property is intended to be transferred as a Public Benefit Conveyance through the Department of

Interior, National Park Service and the Department of Transportation, and is consistent with the intended reuse of the property as set forth in the Memphis Depot Redevelopment Corporation's Reuse Plan. A site map of the property is attached (Enclosure 2).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the facilities has been made based on the following:

- Dunn Field Record of Decision (CH2M Hill, April 2004)
- Dunn Field Remedial Investigation Report (CH2M Hill, July 2002)
- Rev. 2 BRAC Cleanup Plan Version 7 (Labat-Anderson, Inc., December 2003)
- Remediation Report Former Pistol Range Site 60 Dunn Field (Jacobs Federal Programs, April 2003)
- Final Report Chemical Warfare Materiel Investigation and Removal Action at Defense Depot Dunn Field (UXB International, 2001)
- Final Environmental Assessment for BRAC 95 Disposal and Reuse of Defense Depot Memphis, Tennessee (Tetra Tech, September 1998)
- Ordnance and Explosive Waste Chemical Warfare Materials Archives Search Report for Memphis Defense Depot - Findings (U. S. Army Corps of Engineers - St. Louis, 1995)

The information provided herein is a result of a complete search of agency files during the development of these environmental surveys.

A complete list of documents providing information on environmental conditions of the property is attached (Enclosure 3).

4. Environmental Condition of Property Categories

The DOD Environmental Condition of Property (ECP) Categories for the property are as follows:

ECP Category 3: 36.12 - Site 62 (Bauxite Storage removed in 1998)
36.13 - Site 62 (Bauxite Storage removed in 1998)
36.24 - Site 19 (Former Tear Gas Canister Burn Site)
36.25 - Site 20 (Asphalt Burial Site)
36.26 - Site 21 (XXCC-3 Burial Site)
36.27 - Site 50 (Concrete-lined Drainage Ditch)
36.30 - Site 63 (Fluorspar Storage removed in 1999) and the open land area east of the main railroad spur through Dunn Field and excluding existing subparcels

36.31 - 75-foot strip along Hays Rd. from Person Ave. to Dunn Ave for road widening project

36.32 - Open land area in northeast corner excluding existing subparcels

ECP Category 4: 36.14 - Site 60 (Pistol Range removed in 2003) and Site 85 (Building 1184 removed in 2003)

A summary of the ECP categories for specific buildings, parcels, or operable units and the ECP category definitions is provided in Table 1 – Description of Property (Enclosure 4).

4.1 Environmental Remediation Sites

Solid Waste Management Units (SWMUs)

There are 8 Solid Waste Management Units (SWMUs) located within the boundaries of the property included in this FOST. The SWMUs are also designated IRP sites as described in Section 3.1 above and are identified as subparcels on Enclosure 2, Environmental Condition of Property Map: 36.12 and 36.13 – Site/SWMU 62, Bauxite Storage; 36.14 – Site/SWMU 60, Pistol Range and Site/SWMU 85, Building 1184; 36.24 – Site/SWMU 19, Former Tear Gas Canister Burn Site; 36.25 – Site/SWMU 20, Asphalt Burial Site; 36.26 – Site/SWMU 21, XXCC-3 Burial Site; 36.27 – Site/SWMU 50, Concrete-lined Drainage Ditch; 36.30 – Site/SWMU 63, Fluorspar Storage. The SWMUs have been addressed under CERCLA, as required by the Federal Facilities Agreement. A non-time critical removal action of lead in soil at SWMU 60 (Pistol Range) was completed in March 2003. This action also included removal of Building 1184 (SWMU 85). The Dunn Field ROD (April 2004) specifies no further action for SWMUs 60 and 85.

Enclosure 4 provides a summary of the remedial actions at each of the SWMUs, as well as a description of the activities conducted to date at each site. The Dunn Field ROD (April 2004) specifies no remedial actions are necessary at the SWMUs included in the property proposed for transfer.

Ground Water Contamination

None of the property proposed for transfer is situated above areas of groundwater contamination.

4.2. Storage; Release or Disposal of Hazardous Substances

No hazardous substances were stored at the property proposed for transfer. A summary of the areas in which hazardous substances were released or disposed is provided in Enclosures 4 and 5. In the past:

- All grassed areas within subparcels 36.14, 36.24, 36.25, 36.26, 36.30, 36.31 and 36.32 were sprayed with pesticides and herbicides and were investigated as part of the Dunn Field RI.

- Railroad tracks within Subparcel 36.30 were sprayed with pesticides, herbicides and waste oil containing pentachlorophenol (PCP) and were investigated as part of the Dunn Field RI.

Existing records do not support a conclusion that releases in these areas exceeded the 40 CFR Part 373-reportable quantities unless otherwise noted in the Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 5). The release of hazardous substances was either remediated at the time of release or evaluated as part of the Installation Restoration Program (IRP). The Dunn Field ROD (April 2004) states remedial action is not necessary at the property proposed for transfer.

4.3. Petroleum and Petroleum Products

4.3.1. Storage, Release and Disposal of Petroleum Products (not in underground or above-ground storage tanks)

Based on a review of records there is not evidence that any petroleum or petroleum products in excess of 55 gallons were stored, released, or disposed at one time on the property. Accordingly, there is no need for any notification of petroleum product storage, release, or disposal.

4.3.2. USTs and ASTs

Based on a review of records there is not evidence that petroleum or petroleum products were stored in underground or above-ground storage tanks on the property.

4.4 Polychlorinated Biphenyls (PCB)

Based on a review of records and visual inspection, there are no PCB containing transformers, fluorescent light ballasts or other PCB containing equipment located on the property and no evidence of unremediated releases from PCB equipment.

4.5 Asbestos

There are no buildings or structures with asbestos-containing material located on the property.

4.6 Lead Based Paint (LBP)

There are no buildings or structures with LBP located on the property.

4.7 Radiological Materials

Based on a review of records, there is no indication that radioactive material or sources were ever used or stored on the property.

4.8 Radon

There are no buildings or structures on this property; therefore, a radon survey is unnecessary.

4.9 Munitions and Explosives of Concern (MEC)

Based on a review of existing records and available information, none of the land proposed for transfer are known to contain Munitions and Explosives of Concern (MEC). Two sites on the land proposed for transfer (Subparcels 36.14 - Former Pistol Range and 36.24 - Former Tear Gas Canister Burn Site) were identified as possibly containing MEC in the Ordnance and Explosive Waste Chemical Warfare Materials Archives Search Report for Memphis Defense Depot. These sites were investigated during the Dunn Field Engineering Evaluation and Cost Analysis (EE/CA) for Removal of Chemical Warfare Materiel and the Dunn Field RI. No MEC was discovered.

5. ADJACENT PROPERTY CONDITIONS

The following are ongoing environmental investigations/remediations or other hazardous conditions adjacent to the property proposed for transfer: Disposal Sites remedial design and remedial action; Permeable Reactive Barrier (PRB) remedial design and remedial action; and Source Area (Soil Vapor Extraction [SVE]/Zero-Valent Iron [ZVI]) remedial design and remedial action. Tennessee Department of Environment and Conservation (TDEC) has initiated a pre-CERCLA screening of the suspected groundwater contamination source upgradient of Dunn Field, which affects the area along the northern fence line, named the Wabash Avenue Investigation. In 2004, the BCT concurred to change the subparcel boundaries to omit the area situated above groundwater contamination along the northern fence line. Boundaries of the northern subparcels now end about 225 feet south of the northern fence line. The presence of these hazardous conditions and the expected remedial activities adjacent to the property for transfer do not present an unacceptable risk to human health and the environment.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

The following environmental orders/agreements are applicable to the property: Federal Facilities Agreement between United States Environmental Protection Agency Region IV, Tennessee Department of Environment and Conservation, and United States Defense Logistics Agency at the Defense Distribution Depot Memphis (March 6, 1995) and Dunn Field ROD (April 2004). Environmental conditions of the property described in this FOST do not present a hazard for light industrial, commercial and recreational reuse. The Dunn Field ROD (April 2004) designated the property as available for unrestricted use with no further action required. Nevertheless, the property will be subject to zoning requirements and the uses identified in the terms of the transfer. The Transferee must also adhere to the Environmental Protection Provisions (Enclosure 1). Environmental conditions on adjacent federal government property do not present a hazard to the transfer of the property. The Description of Property (Enclosure 4) and Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 5) provide

details regarding environmental conditions for each individual subparcel contained within this FOST.

7. REGULATORY/ PUBLIC COORDINATION

The U.S. Environmental Protection Agency Region IV, the Tennessee Department of Environment and Conservation (TDEC) and the Restoration Advisory Board (RAB) were notified of the initiation of this FOST at the October 16, 2003 RAB meeting. The public review period was from January 24, 2005 through February 23, 2005. No public comments were received during this period. Regulatory comments received during the FOST development have been reviewed and incorporated, as appropriate. A copy of regulatory comments and responses are included at Enclosure 7.

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with proposed transfer of the property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis have been documented in the Final Environmental Assessment for BRAC 95 Disposal and Reuse of Defense Depot Memphis, Tennessee (Tetra Tech, September 1998). Any encumbrances or conditions identified in such analysis as necessary to protect human health or the environment have been incorporated into the FOST. In addition, the proposed transfer is consistent with the intended reuse of the property as set forth in the Depot Redevelopment Corporation's Memphis Depot Redevelopment Plan.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that Department of Defense requirements to reach a finding of suitability to transfer the property have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions (Enclosure 1). All removal or remedial actions necessary to protect human health and the environment have been taken and the property is transferable under CERCLA Section 120(h)(3). In addition to the Environmental Protection Provisions, the deed for this transaction will also contain:

- The covenant under CERCLA § 120(h)(3)(A)(ii)(I) warranting that all remedial action under CERCLA necessary to protect human health and the environment with respect to hazardous substances remaining on the Property has been taken before the date of transfer.
- The covenant under CERCLA § 120(h)(3)(A)(ii)(II) warranting that any remedial action under CERCLA found to be necessary after the date of transfer with respect to such hazardous substances remaining on the Property shall be conducted by the United States.
- The clause as required by CERCLA § 120(h)(3)(A)(iii) granting the United States access to the Property in any case in which remedial action or corrective action is found to be

necessary after the date of transfer. As required under the CERCLA Section 120(h) and DOD FOST Guidance, notification of hazardous substance activities and petroleum product activities shall be provided in the deed. See the Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 5) and Notification of Petroleum Product Storage, Release, or Disposal (Enclosure 6)



MAR 04 2005

Thomas E. Lederle
Director, Base Realignment and Closure,
Hampton Field Office

4 MARCH 2005

Date of Signature

7 Enclosures

- Enclosure 1 - Environmental Protection Provisions
- Enclosure 2 - Environmental Condition of Property Map
- Enclosure 3 - Environmental Documentation
- Enclosure 4 - Table 1 - Description of Property
- Enclosure 5 - Table 2 - Notification of Hazardous Substance Storage, Release, or Disposal
- Enclosure 6 - Table 3 - Notification of Petroleum Product Storage, Release, or Disposal
- Enclosure 7 - Regulatory/Public Comments

Enclosure 1**Environmental Protection Provisions**

Enclosure 1

Environmental Protection Provisions

The following conditions, restrictions, and notifications will be placed in the deed to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities at former Defense Depot Memphis, Tennessee.

1. INCLUSION OF PROVISIONS

The person or entity to whom the property is transferred shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the environmental protection provisions contained herein, and shall require the inclusion of such environmental protection provisions in all further deeds/easements, transfers, leases, or grant of any interest, privilege, or license.

2. NPL PROPERTY

The United States acknowledges that Defense Depot Memphis, Tennessee, has been identified as a National Priority List (NPL) site under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended. The Transferee/Grantee acknowledges that the United States has provided it with a copy of the Defense Depot Memphis, Tennessee Federal Facility Agreement (FFA) entered into by the United States Environmental Protection Agency (EPA), Region 4, the Tennessee Department of Environment and Conservation, and the Defense Logistics Agency, effective on March 6, 1995 and will provide the Transferee/Grantee with a copy of any amendments thereto. The person or entity to whom the property is transferred agrees that should any conflict arise between the terms of the FFA as they presently exist or may be amended, and the provisions of this property transfer, the terms of the FFA will take precedence. The person or entity to whom the property is transferred further agrees that notwithstanding any other provisions of the property transfer, the United States assumes no liability to the person or entity to whom the property is transferred should implementation of the FFA interfere with their use of the property. The person or entity to whom the property is transferred or any subsequent transferee, shall have no claim on account of any such interference against the United States or any officer, agent, employee or contractor thereof.

3. INDEMNIFICATION OF TRANSFEERS OF CLOSING DEFENSE PROPERTY

GRANTOR and GRANTEE are aware of their respective obligations and responsibilities under section 330, National Defense Authorization Act of Fiscal Year 1993, Public Law 102-484, Oct. 23, 1992, 106 Stat. 2371, as amended by section 1002, National Defense Authorization Act for Fiscal Year 1994, Public Law 103-160, Nov. 30, 1993, 107 Stat. 1745. (see 10 U.S.C. §2687, note)

4. CERCLA ACCESS CLAUSE

A. Consistent with CERCLA §120(h)(3)(A)(iii) [42 U.S.C. §9620(h)(3)(A)(iii)], the United States, by and through the Grantor and its agents, reserves a future right of access in the event that any response action, corrective action, or remedial action is found to be necessary on the Property after transfer, or if such access to the Property is necessary to carry out a response action, corrective action, or remedial action on adjoining property. Such access may be necessary to carry out a response action or corrective action on adjoining property, including, but not limited to, the following purposes:

B. To verify continued compliance with the land use restrictions that have been selected by the Record of Decision for the adjoining property;

C. To conduct investigations and surveys, including, where necessary, drilling, soil and groundwater sampling, test-pit excavation, soil borings and other activities;

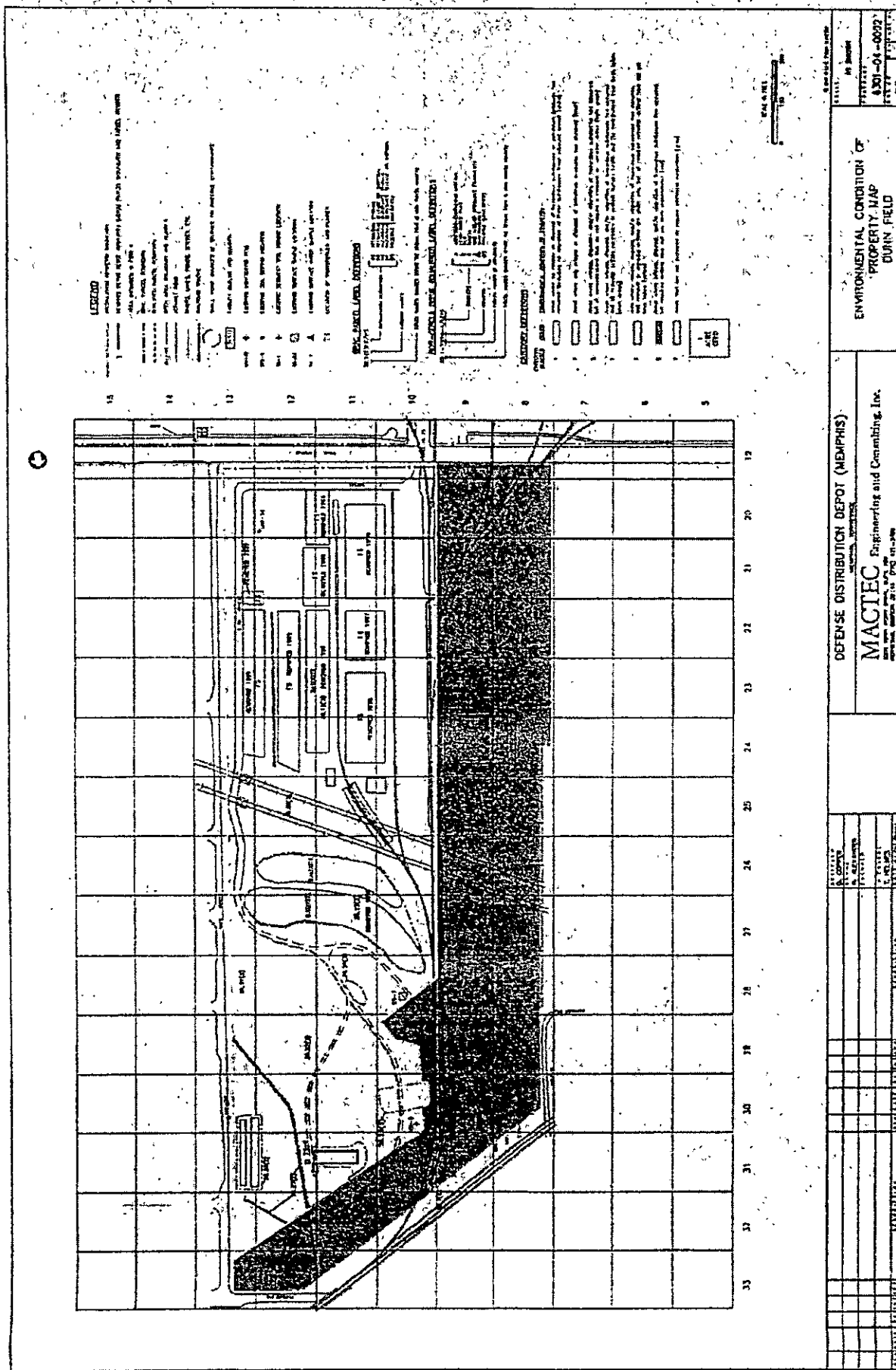
D. To construct, operate, maintain or undertake any other response or remedial actions as required or necessary including, but not limited to monitoring wells, pumping wells and treatment facilities.

5. NO LIABILITY FOR NON-ARMY CONTAMINATION

The Army shall not incur liability for additional response action or corrective action, found to be necessary after the date of transfer, in any case in which the person or entity to whom the property is transferred, or other non-Army entities, is identified as the party responsible for contamination of the property.

Enclosure 2

Environmental Condition of Property Map



Enclosure 3

Environmental Documentation

Enclosure 3
Environmental Documentation

- CH2M HILL. 2002. Dunn Field Remedial Investigation Report, Volumes I through III.
 - . 2003a. Dunn Field 5-Year Review – Final.
 - . 2003b. Dunn Field Feasibility Study Report – Final.
 - . 2004. Dunn Field Record of Decision.
- Defense Distribution Region East (DDRE). 1996a. Environmental Baseline Study Radiological Survey for Defense Distribution Depot Memphis.
- Jacobs Federal Programs. 2003. Remediation Report Former Pistol Range Site 60 Dunn Field.
- Labat-Anderson, Inc. 2003. BRAC Cleanup Plan Version 7, Revision 2.
- Parsons Environmental Science. 1999. Final Engineering Evaluation and Cost Analysis (EE/CA) for the Removal of Chemical Warfare Materiel, Former Defense Distribution Depot Memphis, Tennessee.
- The Pickering Firm, Incorporated. 1993. Storage Tank Survey.
- Prewitt & Associates, Inc. 1997. Archeological Survey of Two Parcels at Defense Distribution Depot Memphis, Tennessee.
- Tetra Tech, Inc. 1998. Final Environmental Assessment for BRAC 95 Disposal and Reuse for Defense Distribution Depot Memphis, Tennessee.
- TRC Mariah Associates, Inc. 1997. A Cultural Resources Inventory and Assessment at the Defense Distribution Depot Memphis, Tennessee.
- U.S. Army Corps of Engineers – St. Louis. 1995. Ordnance and Explosive Waste Chemical Warfare Materials Archives Search Report for Memphis Defense Depot – Findings.
- U.S. Army Corps of Engineers – St. Louis. 1995. Ordnance and Explosive Waste Chemical Warfare Materials Archives Search Report for Memphis Defense Depot – Conclusions and Recommendations.
- UXB International, Inc. 2001. Final Report Chemical Warfare Materiel Investigation and Removal Action at Defense Depot Dunn Field.
- Woodward-Clyde, Inc. 1996. Environmental Baseline Survey (EBS) of Defense Distribution Depot Memphis, Tennessee.

Enclosure 4**Table 1 - Description of Property**

Enclosure 4
Table 1 - Description of Property

Subparcel Designation, ECP Category, Approximate Acreage and Site No.	Building Number or Property Description	Basis for ECP Category	Remedial Action
36.12(3) 32 acres Site 62	Bauxite Storage Removed in 1998	This subparcel is associated with Site/SWMU 62 (Bauxite Storage), one above-grade, covered bauxite pile that the Defense National Stock Pile removed in 1998. The Dunn Field RI Report indicated levels of several constituents in surface soil exceeding BCT screening criteria ² that did not present unacceptable risks for residential or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2002, the BCT concurred to change this subparcel from Category 7 to Category 3.	Dunn Field ROD (April 2004) Indicates no remediation necessary for this subparcel.
36.13(3) 3.22 acres Site 62	Bauxite Storage Removed in 1998	This subparcel is associated with Site/SWMU 62 (Bauxite Storage). Two above-grade, covered bauxite piles that the Defense National Stock Pile removed in 1998. The Dunn Field RI Report indicated levels of several constituents in surface soil exceeding BCT screening criteria ² that did not present unacceptable risks for residential or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2002, the BCT concurred to change this subparcel from Category 7 to Category 3.	Dunn Field ROD (April 2004) Indicates no remediation necessary for this subparcel.
36.14(4) 33 acres Sites 60 and 85	Former Pistol Range and Building 1184 Removed in 2002	This site is a former pistol range (Site/SWMU 60) and impact area and includes Building 1184 (Site/SWMU 85). The building was originally the pistol range house and was also used for temporary pesticide storage. This subparcel also contains grassed areas that were historically sprayed with pesticides and herbicides. The Dunn Field RI Report indicated several constituents in surface soil, sediment and surface water above BCT screening criteria ² that did not present an unacceptable risk for industrial, residential or recreational reuse. However, lead levels at the Site 60 backstop area did present unacceptable risk for residential reuse. In February 2002, the BCT concurred to conduct a removal action at this subparcel, which was completed in March 2003. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In April 2004, the BCT concurred to change this subparcel from Category 6 to Category 4.	Non-time critical removal action of lead in soil at the backstop area of Site 60 and removal of Building 1184 completed in March 2003. Dunn Field ROD (April 2004) Indicates no further remediation necessary for this subparcel.
36.24(3) .08 acres Site 19	Former Tear Gas Canister Burn Site	This subparcel is associated with Site/SWMU 19 (Former Tear Gas Canister Burn Site) where sanitary wastes, construction debris, smoke pots, military souvenir ordinance and tear gas canisters were disposed of from 1955 to 1960. The subparcel was investigated as part of the Engineering Evaluation and Cost Analysis (EE/CA) for Removal of Chemical Warfare Material (Parsons Environmental Science, Inc., June 1999). No unexploded ordinance was discovered. The Dunn Field RI Report indicated levels of several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential, recreational or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2002, the BCT concurred to change this subparcel from Category 7 to Category 3.	Dunn Field ROD (April 2004) Indicates no remediation necessary for this subparcel.
36.23(3) 34 acres Site 20	Asphalt Burial Site	This subparcel is associated with Site/SWMU 20 (Asphalt Burial Site) where asphalt and roofing gravel were dumped in a surface fill, but were reportedly removed in 1981. The Dunn Field RI Report indicated levels of several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential, recreational or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2002, the BCT concurred to change this subparcel from Category 7 to Category 3.	Dunn Field ROD (April 2004) Indicates no remediation necessary for this subparcel.

E-4-1

FOST #4
Former Memphis Depot - Dunn Field

Final
March 4, 2005

Enclosure 4
Table 1 - Description of Property

Subparcel Designation, ECP Category, Approximate Acreage and Site No.	Building Number or Property Description	Basis for ECP Category	Remedial Action
36.26(3) 51 acres Site 21	XXCC-3 Burial Site	This subparcel is associated with Site/SWMU 21 (XXCC-3 Burial Site) that consists of two trenches of unknown depths where approximately 300,000 lbs of XXCC-3 impregnite (used to make clothing less susceptible to the effects of chemical warfare agents) and clothing treated with XXCC-3 impregnite was buried. The Dunn Field RI Report indicated levels of several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential, recreational or industrial reuse. The report also indicated that no migration of zinc or SVOC (by-products of XXCC-3) has occurred from this subparcel. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2002, the BCT concurred to change this subparcel from Category 7 to Category 3.	Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.
36.27(3) 15 acres Site 50	Concrete-lined Drainage Ditch	This subparcel is associated with Site/SWMU 50 (Dunn Field Northeast Quadrant Drainage Ditch), a concrete-lined drainage ditch collects stormwater runoff from surrounding areas. In 2004, the BCT concurred to change the subparcel boundary to eliminate the area situated above groundwater contamination along the northern fence line (north subparcel boundary now ends about 225 feet south of the northern fence line). The Dunn Field RI Report indicated levels of several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential, recreational and industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this site. In 2004, the BCT concurred to change this subparcel from Category 6 to Category 3.	Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.
36.30(3) 22.58 acres Site 63	Open land area east of railroad tracks, excluding existing subparcels Fluorspar Storage Removed in 1999	This subparcel is associated with the open land area east of the railroad tracks of Dunn Field excluding Subparcels 36.12 and 36.13 and includes Site/SWMU 63 (8 Fluorspar storage mounds removed by the Defense National Stock Pile in 1999). In 2004, the BCT concurred to change the subparcel boundary to eliminate the area situated above groundwater contamination along the northern fence line (north subparcel boundary now ends about 225 feet south of the northern fence line). The BCT also changed the western boundary to coincide with the area identified in the Dunn Field ROD (April 2004) as available for unrestricted reuse. This subparcel contains railroad tracks that were historically sprayed with pesticides, herbicides, and waste oil containing PCP. This subparcel also contains grassed and gravel areas that were historically sprayed with pesticides and herbicides. The Dunn Field RI Report indicated several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for industrial or residential reuse, except for arsenic levels that presented unacceptable risks for residential reuse, but were similar to levels identified throughout Shelby County and will not require remedial action ¹ . The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this area or for Site 63. In 2004, the BCT concurred to change this subparcel from Category 6 to Category 3.	Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.

E-4-2

FOST #4
Former Memphis Depot - Dunn Field

Final
March 4, 2005

Enclosure 4

Table 1 - Description of Property

Subparcel Designation, ECP Category, Approximate Acreage and Site No.	Building Number or Property Description	Basis for ECP Category	Remedial Action
36.31(3) 5.22 acres	75-foot strip along Hays Rd. from Person Ave. to Dunn Ave. for road widening project	This subparcel is associated with an open land area of Dunn Field along Hays Street from Person Avenue to Dunn Avenue, excluding Subparcel 36.26. The DRC requested this subparcel due to a Memphis road works project to expand Hays Street. In 2004, the BCT concurred to change the subparcel boundary eliminating the area situated above groundwater contamination along the northern fence line (northeast corner of subparcel boundary now ends about 116 feet south of the northern fence line and northwest corner of subparcel boundary now ends about 163.37 south of the northern fence line). This subparcel contains grassy areas that were historically sprayed with pesticides and herbicides. The Dunn Field RI Report indicated levels of several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this subparcel. In 2004, the BCT concurred to change this subparcel from Category 6 to Category 3.	Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.
36.32(3) 7.82 acres	Open land area in northeast corner (recreation area) excluding existing subparcels	This subparcel is associated with the open land area in the northeast corner of Dunn Field, excluding Subparcels 36.14, 36.25, 36.26 and 36.27. The Depot created this subparcel due to interest in the area as a future recreation/park area. In 2004, the BCT concurred to change the subparcel boundary eliminating the area situated above groundwater contamination along the northern fence line (north subparcel boundary now ends about 225 feet south of the northern fence line). This subparcel contains grassy areas that were historically sprayed with pesticides and herbicides. The Dunn Field RI Report indicated several constituents exceeding BCT screening criteria ² that did not present unacceptable risks for residential, recreational or industrial reuse. The Dunn Field ROD (April 2004) does not contain Remedial Action Objectives for this area. In 2004, the BCT concurred to change this subparcel from Category 6 to Category 3.	Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.

¹ Arsenic occurs naturally. Even though risk assessment results indicated that arsenic levels present unacceptable residential risk, arsenic levels are similar to background levels for the Shelby County area and are being regarded as naturally occurring.

² Screening criteria were established at the August 1997 BCT meeting and were based on preliminary risk based concentrations, the National Contingency Plan, Safe Drinking Water Act maximum contaminant levels and, for some metals, regional background levels.

Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).

Category 2: Areas where only release or disposal of petroleum products has occurred.

Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred but at concentrations that do not require a removal or remedial response.

Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

Category 5: Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.

Category 6: Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.

Category 7: Areas that are not evaluated or require additional evaluation.

E-4-3

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Enclosure 5**Table 2 - Notification of Hazardous Substance Storage, Release, or Disposal**

Enclosure 5

Table 2 - Notification of Hazardous Substances Storage, Release or Disposal

The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or 'Superfund') 42 U.S.C. section 9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1000 kilograms or the hazardous substance's CERCLA reportable quantity (which ever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.

Subparcel Number and Description	Name of Hazardous Substance and CASRN	Date of Storage, Release or Disposal	Remedial Actions
Subparcel 36.26 Site 21	Disposal: XXCC3 (chloroform 67-66-3, chlorine 7782-50-5)	Exact disposal date unknown assumed in the 1950s during use of Dunn Field for disposal by Army Quartermaster Corps.	The Dunn Field RI indicated no migration of zinc or SVOCs (by- products of XXCC-3) from this subparcel. Dunn Field ROD (April 2004) indicates no remediation necessary for this subparcel.

E-5-1

Enclosure 6**Table 3 - Notification of Petroleum Product Storage, Release, or
Disposal**

Enclosure 6

Table 3 - Notification of Petroleum Product Storage, Release, or Disposal

Subparcel Number and Location	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
There is no evidence that any petroleum or petroleum products in excess of 55 gallons were stored, released, or disposed at one time on the property. Accordingly, there is no need for any notification of petroleum product storage, release, or disposal.			

Enclosure 7

Regulatory Comments and Responses

Commenters: Turpin Ballard and Martha Brock, EPA

Section #	Comment	Response
1. <u>Section 1.0.</u>	The last sentence states that there are use restrictions necessary to ensure protection of human health and the environment specified in Enclosure 1. First, the FOST elsewhere (see Section 3.0, page 3-1) states that residual contamination does not exceed action levels for residential, recreational, commercial or industrial use. So use restrictions appear to be unnecessary. Second, there don't appear to be use restrictions designed to protect human health or the environment in Encl. 1. Please reconcile the inconsistency.	Agree that statement is inconsistent. Will strike the sentence in its entirety.
2. <u>Section 3.1.</u>	Former Pistol Range described as Cat 4 on page 3-2 and as Cat 3 in Table 3. Cat 4 appears to be correct.	Agree. Enclosure 4 (not Table 3) will be revised to show Former Pistol Range as Category 4.
3. <u>Section 3.10.</u>	Please confirm that the statement in Section 3.10 regarding suspected upgradient groundwater contamination not presenting an unacceptable risk to human health and the environment. Is this the possible dry-cleaning site?	Statement in Section 3.10 of the FOST is correct. The parcel boundary was shifted to remove the area of groundwater contamination, as stated in the Property Descriptions in Enclosure 4. Will insert similar language at the end of the highlighted sentence. "In 2004, the BCT concurred to change the subparcel boundaries to eliminate the area situated above groundwater contamination along the northern fence line (boundaries of northern subparcels now ends about 225 feet south of the northern fence line)." Based on my discussion with Jim Morrison on 12/20/04, the investigation into the offsite source indicated that the as-yet unidentified source was upgradient of the dry cleaning site.
4. <u>Page E-1-2.</u>	Would like Enclosure 1 "No Liability for Army Contamination" to read: "The obligation of the United States to conduct additional response action or corrective action does not include response action or corrective action required by an act or omission of the transferee, or its successors and assigns, which either a) introduces new or additional contamination or b) increases the cost of the required response action by improperly managing any CERCLA contamination present on the property at the time of initial transfer by the United States." The existing wording may inappropriately narrow the scope of the CERCLA covenant to conduct additional remedial action; the proposed rewording should protect the Army against conducting remedial action for which it is not liable, but not limit its liability for existing contamination should a future transferee become a "party responsible for contamination" in the	This text was taken from previously approved FOSTs. Any changes will have to be coordinated with BRAC office. Do not agree that change is necessary.

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<p>5. <u>Section 4.0.</u></p>	<p>future.</p> <p>See comment 1. This kind of text that the property does not pose a risk "so long as the Transferee adheres to the Environment Protection Provisions" appears to be inconsistent with the statement in Section 3.0 that the residual contamination is not present at levels that pose a risk to human health or the environment for any use. Please reconcile.</p>	<p>Agree Will revise as follows: "The following environmental orders/agreements are applicable to the property: Federal Facilities Agreement between United States Environmental Protection Agency Region IV, Tennessee Department of Environment and Conservation, and United States Defense Logistics Agency at the Defense Distribution Depot Memphis (March 6, 1995) and Dunn Field ROD (April 2004). Environmental conditions of the property described in this FOST do not present a hazard for light industrial, commercial and recreational reuse. The Dunn Field ROD (April 2004) designated the property as available for unrestricted use with no further action required. Nevertheless, the property will be subject to zoning requirements and the uses identified in the terms of the transfer. The Transferee must also adhere to the Environmental Protection Provisions (Enclosure 1). Environmental conditions on adjacent federal government property do not present a hazard to the transfer of the property. The Description of Property (Enclosure 4) and Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 5) provide details regarding environmental conditions for each individual subparcel contained within this FOST."</p> <p>In addition will revise sentence in Section 3.0 to: "Residual soil contamination levels do not present unacceptable risk to human health or the environment for the proposed light industrial, commercial and recreational uses. The Dunn Field ROD (April 2004) designated the property as available for unrestricted use with no further action required."</p>
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