



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 97

Memphis, Tennessee  
January 11, 1995

Ms. Christine Kartman  
Defense Distribution Depot Memphis  
Environmental Protection and Safety Office (DDMT-DE)  
2163 Airways Boulevard  
Memphis, TN 38114-5210

Subject: Comments relative to the "Defense Distribution Depot Memphis, Interim Remedial Action for the Facility."

Dear Ms. Kartman:

The following comments, observations and concerns are made regarding the (IRA) since in the past I have attended the Restoration Advisory Board (RAB) meetings as an interested and concerned citizen. Also, I had the opportunity to attend the public hearing at the Dunn Road Elementary School on December 20, 1994.

In order for me to make comments, I would like to very briefly go back into the past and reveal something of my background and the Defense Depot as well. I am a senior citizen and I retired from the Defense Distribution Depot Memphis on July 3, 1986 after 27 years of dedicated work. During my youth in the mid 1930's, I remember the site at 2163 Airways Boulevard as a quiet countryside, zoned agricultural, producing cotton and truck crops. This land was in rural Shelby County and the City of Memphis was confined within the parkway boundaries. When construction began, I observed the progress of the Administration Building (Building 144) and also the warehouses above the hill as well. The Depot officially opened in 1942 as the "Memphis Army Depot".

I do feel that my comments will have an overlay between the Federal Facility Agreement (FFA) and the Interim Remedial Action (IRA) and may not lend anything of technical value to either plan.

Water is an element, it's something that every individual takes for granted that will be there forever when needed in pure form. Water can be viewed as a natural habitat. All of Shelby County due to its geographic location has an abundant supply of pure ground water, and every citizen should be very proud of this fact. For sure the rest of America views us with great envy, and every citizen must ensure it remains this way.

One fact to remember - the Environmental Protection Agency (EPA) was established on December 2, 1970, and regulatory permits were required about 1977. Another point quite appropriate to mention, "the Environmental Protection Agency was created to permit coordinated and effective Governmental action on behalf of the Environment."

In the past, individuals, companies and corporations have dumped material and created waste sites in an uncontrolled manner without documentation. Some of which are now considered hazardous, and they have flaunted the stringent Laws, Regulations and Procedures as we know them today for the disposal of hazardous materials. The City of Memphis has the highest number of uncontrolled toxic waste sites of any major city of its size in America, in fact there are approximately 300 that are considered possibly hazardous or marginal.

Here is a phrase that is common place and one can hear it repeated quite often, "Let the Government do it." In a way I find this synonymous, because the individual making such a statement unknowingly doesn't realize that they are the Government.

In order for one to compare disposal activities in the past at the Defense Depot Memphis Dunn Road site versus the private disposal sites (estimated at approximately 300) and to be consistent with fairness one will have to look for an equal or parallel situation.

Pesticides are used at the Defense Depot to control termites and other insects, and herbicides are also used to control weeds and grass in the open storage area and the rail yards. Pesticides are used in private homes to control termites, and herbicides are also used along railroads, some road right-of-ways in rural Shelby County, but most of all it's used very extensively in farming operations.

At the Defense Depot Memphis, chemicals and hazardous materials are stored in a safe and secure area under tight security. In the work area there are stations to render first aid to anyone exposed in a harmful way to hazardous materials. The Department of Defense has in place a health monitoring program to periodically test employees to determine if their work environment is hazardous to their health.

In past years at the Defense Depot Memphis Dunn Road site, several different types of material have been disposed of (some of which are listed as hazardous) in a controlled manner, well documented, and the method of disposal was common place during the period of time that the event occurred.

In the private area at many of the dump sites the method of disposal was uncontrolled, not documented and presently many of those responsible for creating these conditions may be disinclined to accept the responsibility to take corrective action.

At the meetings, I have listened with great interest to comments and requests that many citizens of the 38114 zip code community area have made and it's obvious that some are in a state of dismay and have a perception. With the proposed ground water action plan in its infancy some are asking about relocation costs, what liability will the Federal Government assume, about the high rate of cancer reported in the area, also, should one continue to raise a garden. These concerns are being presented before the Establishment of Precise Facts. Some citizens are saying that Government is not listening to what they have to say. As a neighborhood leader, I find that Government at all levels is quite accessible. One must remember the fact that America is a Democracy.

One way to dispel this fear is the neighborhood leaders and the elected officials of the City of Memphis Government need to get involved in a positive way with vigor and reach out to citizens of their community, it's their responsibility.

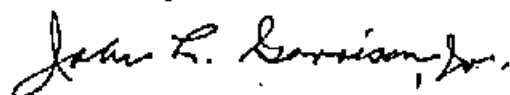
I consider it admirable that the U.S. Department of Defense has taken the initiative in a very positive way and put all of the facts on the table to determine the extent of contaminated water beneath Dunn Field. It will be a challenge, also, a learning experience. Looking at this in a positive way, knowledge gained from the Interim Remedial Action (IRA) process will greatly benefit those in the private area, and will serve as a role model for all to follow.

In review of a brochure generated by Judge Larry Potter of the Shelby County Environmental Court for a safer and cleaner Memphis and Shelby County, at the end is one sentence, the words are simple, direct and the message is very powerful, "Let's consider our world not as inherited from our parents, but as borrowed from our children." Every citizen should read these words and adhere to its meaning in order to safeguard our environment for all future generations to come.

Every citizen should be highly supportive of the leadership role of the Restoration Advisory Board as well as the leadership of Ms. Christine Kartman of the Environmental Protection Branch, Mr. Frank Novitzki, the Project Manager and Mr. Mark Corey, the Technical Manager. They have always made their presentations in a highly professional manner, along with an effective and informative agenda.

As a concerned citizen, I consider it a privilege and my civic duty to respond with these public comments.

Sincerely,



John L. Garrison, Jr.

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