



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 4**

**ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960**

**JUN - 3 2016**

Mr. Steve Goins  
Director, Division of Remediation  
Tennessee Department of Environment  
and Conservation  
312 Rosa L. Parks Avenue  
Nashville, Tennessee 37243

Dear Mr. Goins:

The purpose of this letter is to solicit the support of the State of Tennessee on the listing of the Former Custom Cleaners Site (the Site), located in Memphis, Shelby County, Tennessee, on the National Priorities List (NPL). The U.S. Environmental Protection Agency and the Tennessee Department of Environment and Conservation (TDEC) have evaluated the Site for releases of hazardous substances, pollutants or contaminants under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The results of the site evaluation confirmed that there has been a release of hazardous substances to soil, groundwater and indoor air at the Site, and TDEC and the EPA believe the Site poses a significant threat to public health or the environment.

Custom Cleaners was a dry cleaning operation, which utilized tetrachloroethene (PCE). It operated at the Site from 1950 to the mid-1990s. Site soils, subsurface soils, indoor air and groundwater have been contaminated with PCE. PCE has been detected above its Maximum Contaminant Level in groundwater at the Site. PCE has been detected at concentrations in excess of applicable screening levels in indoor air and subsurface soil. High levels of subsurface soil contamination with PCE continue to serve as a source of groundwater contamination. Vapors have migrated from the subsurface into the indoor air of the vacant building onsite.

There is a potential for PCE-contaminated groundwater to impact the nearby, downgradient Sheahan well field; a component of the City of Memphis' municipal well system. Within two miles of the Site, the intermediate aquifer beneath the Site is interconnected with the municipal drinking water source, the Memphis Sands aquifer. Twelve of the 22 supply wells in the Sheahan well field are one mile or closer to the Site. In addition to threatening the quality of the drinking water aquifer, vapor intrusion has affected the currently vacant building on the Site. Additional investigation is needed to determine the extent of vapor intrusion and whether additional areas are impacted. Long-term action is needed to remediate risks at the Site, and the EPA is only able to obtain funds for long-term remedial actions for those sites included on the NPL.

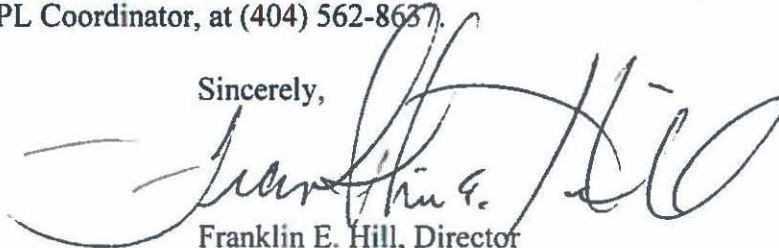
The EPA is committed to working cooperatively with the State and local community throughout the listing and subsequent Superfund cleanup process, and to ensuring that the EPA's actions are conducted in an open and transparent manner. For a fund-financed remedial action prior to initiation of the remedial action, the EPA and the state will collaborate in the development of a Superfund State contract to provide the State assurances required by CERCLA, including, for example, the State's statutory cost share for the remedial action and assumption of operation and maintenance responsibilities.

The EPA is completing the Hazard Ranking System documentation record for the Site, establishing that the Site qualifies for the NPL. TDEC and the EPA have worked cooperatively on Site investigations and maintained close communication throughout the Superfund evaluation process. To further coordinate with the State on the NPL listing decision process, we are soliciting the State's written support for the EPA to proceed with the NPL listing process for this Site. This letter, therefore, solicits from the Governor of the State of Tennessee, or a delegated representative, the State's position on proposing the Former Custom Cleaners Site to the NPL. Please respond to:

Heather McTeer Toney  
Regional Administrator  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-3104

We appreciate a prompt response so that the EPA may move forward expeditiously in the listing process. In order to stay on schedule to propose the Site in the next NPL update (anticipated to occur in September 2016), we must receive concurrence by July 1, 2016. We look forward to working with your staff to promote our common goal of protecting human health and the environment. Should you desire any additional information, please do not hesitate to contact me at (404) 562-8599, or have your staff contact Cathy Amoroso, Region 4 NPL Coordinator, at (404) 562-8637.

Sincerely,

A handwritten signature in black ink, appearing to read "Franklin E. Hill", written over a large, stylized flourish.

Franklin E. Hill, Director  
Superfund Division

cc: Terry Jeng, EPA-OSRTI