UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303

August 29, 2011

Ms. Carolyn Jones
Program Manager
Office of the Chief of Staff for Installation Management
Attn: BRAC Division (DAIM-ODB)
2530 Crystal Drive (Taylor Bldg.), Room 5000
Arlington, VA 22202-3940

Subject: Approval of the Dunn Field Off-Depot Ground Water Interim Remedial Action Completion Report, Revision 1 (IRACR) for the Dunn Field Record of Decision at the Former Memphis Depot

Dear Ms. Jones:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the Army's responses to EPA comments on the initial draft of the subject report, and has determined that the responses were appropriately addressed in the revision. Accordingly, the Agency hereby approves the report.

The Dunn Field remedy was selected jointly by EPA, the Defense Logistics Agency (DLA), and the Tennessee Department of Environment and Conservation (TDEC) in September 2004. It has been implemented in sequential phases, with Off-Depot ground water being the last phase. The contaminants of concern for ground water are chlorinated volatile organic compounds (CVOCs). The Off-Depot phase of the remedy consists of a combination of ground water treatment, monitored natural attenuation (MNA), and land use controls (LUCs). The treatment element employs air sparging with soil vapor extraction (AS/SVE) until upgradient concentrations of CVOCs reach a treatment goal of 50 ug/L on an individual contaminant basis. MNA of low-concentration residual CVOCs will continue until the ground water restoration objective is achieved. LUCs will continue to prevent unacceptable exposure to contaminated ground water during the restoration timeframe.

The DLA, as the Army's predecessor agent for the Department of Defense, completed construction of the AS/SVE treatment system in October 2009. Since then, the system has been in continuous operation. As a result of source control actions on Dunn Field during implementation of previous phases of the remedy, CVOC concentrations continue to decrease in the ground water between Dunn field and the AS/SVE system. To date, the AS/SVE system has removed substantial dissolved phase contamination and prevented migration of CVOCs further downgradient. Once the concentration goal for active treatment as expressed above is attained, MNA is expected to achieve the final increment of ground water restoration within a reasonable timeframe. Current estimates in the subject report support restoration with 20 years.

EPA wishes to congratulate both the Army, as current lead agency, and the Defense Logistics Agency, which initiated and carried out the majority of the response actions, for the efficient and successful way in which this response action has been managed. We look forward to working together toward meeting the final objectives of ground water restoration, both for this action at Dunn Field and for the Main Installation, and to subsequently deleting the site from the National Priorities List.

If you have any questions, please contact Turpin Ballard of my staff at 404/562-8553.

Sincerely yours,

Arthur F. Collins

Arthur Collins, Chief
Federal Facilities Branch

Cc: Jamie Woods, DOR/TDEC/Memphis
Michael Dobbs, DLA/DDC
Debbie Jourdan, EPA/R4