



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 709



DEFENSE LOGISTICS AGENCY
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File: 541.460.0001
C.H. 709

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IN REPLY
REFER TO

DDSP-ID (Memphis)

August 23, 2002

Mr. Turpin Ballard
Environmental Protection Agency, Region IV
Federal Facilities Branch
61 Forsyth Street
Atlanta, GA 30303

Dear Mr. Ballard

Enclosed is a revised schedule for your review. The current schedule, as noted in Section 5 of the BCP, February 2002, does not reflect adequate and allowable review time of documents, per the Federal Facilities Agreement. This revised schedule will be included for your approval in the BRAC Cleanup Plan (BCP) Version 6.

In response to your recent letter concerning our schedule, I offer the following. DLA will submit the Feasibility Study for Dunn Field to EPA on Monday, August 26, 2002. To assist the Memphis and Shelby County efforts to revitalize and reuse this former military installation, the BCI voting members agreed and believed that the aggressive schedule referred to in your letter was not unrealistic. Since then additional data provides this team significant challenges earlier unknown to the BCI members. We all recognize the importance of meeting deliverable dates and avoiding slippages. The challenges indicated in this letter show the need to revise the schedule using less aggressive review and task times as outlined in our Federal Facilities Agreement (FFA). These challenges also show "good cause" for the slippages in our current schedule.

1. MI Remedial Design (MI RD) Workplan Rev. 0 and Rev. 1 were on schedule with the 29-Jan-02 Master Schedule. EPA approved the Rev. 1 MI RD Workplan on 2-May-02 (exclusive of the LTOA Memo). We have not received written approval from IDFC. We excluded the LTOA Memorandum from Rev. 1 of this work plan due to ongoing discussions concerning the accomplishment of objectives at a number of the LTOA sites with IDFC. These discussions continued through the June 2002 BCI Meeting and incorporated in the Rev. 2 (Final) MI RD Workplan.
2. MI Remedial Design (MI RD) Package This schedule slippage is due to delays in the implementation of the EBT Treatability Study on the MI. There has been a 2-month delay from the 29-Jan-02 Master Schedule for the beginning of the "performance monitoring" of the EBT study. This has 'rippled' through the schedule and has delayed the MI RD Package and subsequent deliverables (that have the MI RD Package as their predecessor) by approximately 2 months. Review of the Rev. 0 version of the EBT Treatability Study Workplan resulted in significant changes to the document and the subsequent field work schedules. The 29-Jan-02 schedule showed field work for the EBT study beginning following the BCI review of the Rev. 0 version of the EBT Treatability Study Workplan; however, the field activities began following issuance of the Rev. 1 version of the EBT Treatability Study Workplan, dated 4-Apr-02 (injection well installation began on 15-Apr).
3. Dunn Field Remedial Investigation (DF RI) The Rev. 2 of the DF RI report was issued on 24-Jul-02. BCI comments on Rev. 0 were received on 26-Feb-02 (IDFC delay). This resulted in a 91-day review cycle (it was scheduled for a 60-day review cycle) and thus, a 31-day delay to the schedule and the submittal of the Rev. 1 DF RI report. In addition, in Feb-02 the BCI decided that the RI did not provide enough detail when addressing the Disposal Sites on Dunn Field. The BCI decided on a 11-Feb-02 conference call that the next steps were to (1) expand the Rev. 1 RI

report to include descriptions of each site, history of disposal activities and the investigations conducted to date, (2) document the qualitative risks associated with the disposal sites in the risk assessment portion of the RI. The inclusion of this information also caused a delay in the submittal of the Rev. 1 DI RI report. We provided Rev. 1 DI RI on 9-Apr-02 (an approximate 2-month delay from the 29-Jan-02 Master Schedule). We received EPA comments on 28-May-02. This was a 50-day review period, which was 20-days longer than the 30-day review period identified in the 29-Jan-02 Master Schedule. The Rev. 2 (Final) DI RI report submitted on 27-Jun-02 was an approximate 3-month delay from the 29-Jan-02 Master Schedule.

4. Dunn Field Feasibility Study (FS) There have been significant delays related to the submittal of the Dunn Field RI and FS reports since the last approved Master Schedule dated January 29, 2002. In February 2002 the BCI decided that the Disposal Sites on Dunn Field were not addressed in sufficient detail in the Rev. 0 Dunn Field RI report and required development of remedial alternatives and cost estimates in the FS (Rev. 0) based on existing data and historical information. The inclusion of additional information concerning the Disposal Sites caused an initial delay of the submittal of the Dunn Field FS.

Additional delays in the FS were caused by the need to develop specific vadose-zone soil cleanup levels for VOCs treated by SVL (the presumptive remedy for VOC contaminated soil), using recommendations from the Remedial Process Optimization (RPO) Team during the April 30, 2002 RPO meeting. The model selected to perform these calculations was LMSOFT [Exposure Model for Soil Organic Fate and Transport], developed by ENSR Consulting and Engineering (LPA, 1997). The LMSOFT model is a screening model primarily based on the work described by Jury et al (1983, 1990), as recommended by the RPO Team. The unexpected and extended time needed to complete this modeling effort added to the delay in the submittal of the FS.

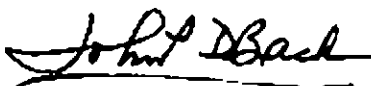
The development of the remedial alternatives for VOCs in onsite and offsite groundwater at Dunn Field also contributed to the unexpected delay of the FS. As discussed in CH2M Hill's memorandum to the BCI, dated August 13, 2002, the team examined a number of groundwater remedial alternatives during the development of the FS. Based on the results of a screening matrix of the final screening of "active" remedial alternatives, some "last minute" changes to the remedial strategies for groundwater in the FS occurred further increasing the delay of the FS completion and delivery.

The schedule slippages for Dunn Field identified above have "rippled" through the rest of the deliverables (FS, Proposed Plan and ROD). The revised schedule realistically reflects adequate preparation and review time in accordance with the FFA.

We believe our success and accomplishments at the Depot reflects the positive working relationship we have with our team members. We value your input and solicit any comments or questions.

For more information, please contact me at (901) 544-0622.

Sincerely,



JOHN P. DEBACK
DOD BRAC Environmental Coordinator

Enclosure

CC

IDL - Jim Morrison

DDC - Mike Dobbs

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE