



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 760



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Solid Waste Management
Fifth Floor, L & C Tower
401 Church Street
Nashville, Tennessee 37243 - 1535

CERTIFIED MAIL # 70020510000212535740
RETURN RECEIPT REQUESTED

October 6, 2003

Mr. John De Back, Environmental Coordinator
Defense Logistics Agency
DDSP-D (Memphis)
2163 Airways Boulevard Bldg. 144
Memphis, Tennessee 38114

RE: Requirement to Submit Corrective Action Permit Application
Defense Depot Memphis
Permit Number TNHW-053
EPA I.D. TN4 210 020 570

Dear Mr. De Back:

In accordance with the June 19, 2003 letter from Mike Apple, and as agreed to at our August 14th meeting in Nashville, the Division of Solid Waste Management requires Defense Depot Memphis (DDM) to submit Part A and Part B corrective action permit renewal applications. DDM shall submit the applications to this office by March 31, 2004.

The Part A, EPA Form 8700-23, shall reflect that corrective action under the Federal Facilities Agreement (FFA) is the only hazardous waste activity to be pursued at the site. As all corrective action has been, and shall continue to be performed under CERCLA and State Superfund, DDM may submit a streamlined hazardous waste Part B permit application. The Division agrees that it is appropriate to allow DDM to submit information gleaned from CERCLA investigation and remedial action work plans, reports or other documents to meet the requirements of Tennessee Rule 1200-1-11-.07(5)(e).

The application needs to clearly identify all of the solid waste management units (SWMUs) and areas of concern (AOCs) listed in the previous DDM hazardous waste permit, as well as any newly discovered or suspected units. DDM shall provide a summary, including documentation and rationale, for any change of a unit's status since the previous permit. The Division will

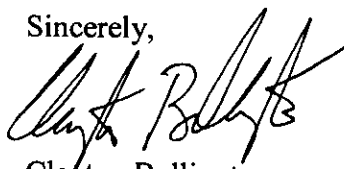
Mr. John De Back
October 6, 2003
Page 2

provide DDM a model chart, based on the unit's current status, that outlines the information required by Rule 1200-1-11-.07(5)(e)1. Public participation is required for all remedial action decisions, including no further action decisions. The Division considers a CERCLA Record of Decision as an adequate public notification and comment opportunity for modifying a unit's corrective action status.

When the hazardous waste renewal permit is issued, the Division plans to continue to defer corrective action to CERCLA and State Superfund as deemed appropriate under the FFA. However, until new permit conditions become effective, DDM is required to update the Division of any newly identified SWMU or AOC and any newly identified or suspected release from an existing unit.

If there are any questions or comments regarding the application or any other corrective action permitting process, please feel free to contact me by phone at (615) 532-0859 or through e-mail at clayton.bullington@state.tn.us.

Sincerely,



Clayton Bullington
ES-5

cc: David M. Buxbaum, Regional Attorney, US Army Southern Region Office
Narindar M. Kumar, Chief, RCRA Programs, US EPA, Region 4
Otis Johnson, RCRA Programs, US EPA, Region 4
Jamie Burroughs, Manager, TSD Section, SWM
William Krispin, Manager, Permitting Section, SWM

FINAL PAGE

ADMINISTRATIVE RECORD

FINAL PAGE