



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 763



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Joann.Socash@brooks.af.mil  
**Cc:**  
**Subject:** Extension of Dunn Field Rev. 1 ROD delivery date  
**Sent:** 10/22/2003 9.28 PM **Importance:** Normal

Team,

The delivery date of Revision 1 of the DF ROD is extended until 12 November 2003 based on the extension rationale provided by EPA. I will not be initiating a request for extension under the FFA as EPA has documented the rationale and initiated the request. That rationale is provided below.

John P. De Back  
DOD Base Transition Coordinator  
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Memphis, TN 38114  
  
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In a message dated 10/22/2003 4:10:03 PM Central Daylight Time, Ballard.Turpin@epamail.epa.gov writes:

John

The effort to develop a table of soil remediation goals (RGs) for non-VOC chemicals that might be found under the burial pits at Dunn field is taking a longer time to coordinate between TDEC, EPA, and CH2M Hill. This is no fault of the contractor, but derives from a draft table first presented at last week's BCT meeting. I believe that the RG proposed in that table, which were based on potential migration to ground water, were too low, for reasons expressed in the emails that I copied you on yesterday. It was only yesterday that Jim Morrison and I agreed on an approach to explaining why it was unnecessary to clean up to ground water protective concentrations for most of the chemicals. The approach includes, among other things, specific circumstances of the site and characteristics of the contaminants. It takes time to fully develop this rationale in the ROD, and provide supporting information, explanation, and appropriate tables.

I want this next revision of the ROD to be as complete and acceptable as

possible, because it needs to survive both Army and TDEC review. Accordingly, as provided in Section XV(B)(5) of the FFA, I believe it is both prudent and necessary for DLA to take up to an additional 20 days to finalize and submit Rev. 1 of the ROD. EPA concurrence is not necessary in exercising this section of the FFA. However, because this message is initiated by EPA, it would be superfluous for DLA to generate a separate request letter back to EPA.

Wm. Turpin Ballard, RPM  
Federal Facilities Branch  
EPA Region 4  
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 Recommend extension of ROD delivery date

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**ADMINISTRATIVE RECORD**

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