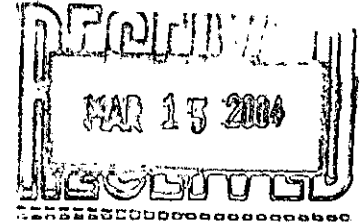




THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 780



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Superfund
401 Church Street, 4th Floor Annex
Nashville, TN 37243-1538

March 9, 2004

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

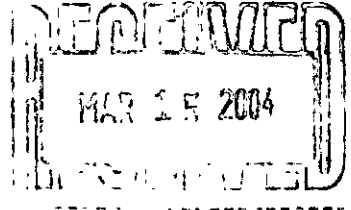
Dear Mr. De Back:

Subject: Ground Water Contamination at the Defense Depot Memphis, Tennessee

The purpose of this letter is to clarify the Tennessee Department of Environment and Conservation's (TDEC) position on the identification of State 'applicable or relevant and appropriate' requirements (ARARs) for the CERCLA cleanup of contaminated ground water at the Defense Depot Memphis, Tennessee (DDMT). In addition, we want to emphasize that ground water, as 'Waters of the State' (as defined in T.C.A. Section 69-3-101), is a valuable State resource that TDEC generally believes requires restoration by the responsible party.

TDEC is a party to the Federal Facility Agreement for DDMT. Mr. Jim Morrison is the TDEC representative at this Federal Facility and he has actively participated in the development of the draft Memphis Depot Dunn Field Record of Decision (Dunn Field ROD), which included identifying State ARARs. Consistent with CERCLA 121(d)(2), the FFA Section X, and 40 CFR Parts 330.400(g) and 300.500 et seq. *State Involvement in Hazardous Substance Response*, TDEC has identified and timely communicated potential ARARs for the proposed response action at DDMT.

TDEC concurs with the inclusion of the Rules of TDEC Chapter 1200-4-3-.7 and .8 related to the classification and criteria for General Use Ground Water as ARARs in the Dunn Field ROD. Further, TDEC fully supports the Defense Logistics Agency's planned remedy as noted in the Dunn Field ROD for contaminated ground water at DDMT, including the offsite plume. The remedy will utilize treatment to restore ground water quality and meet the State's ground water criteria. TDEC believes this response action is especially necessary considering:



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1. The high levels of contamination detected in ground water at Dunn Field.
2. The documented inter-connection between the shallow fluvial aquifer and the underlying Memphis Aquifer (the drinking water supply aquifer for the City of Memphis).
3. The proximity of Dunn Field groundwater contaminants to the Allen Well Field that produces drinking water for the City of Memphis.

Please contact Jim Morrison at (615) 532-0910 if you have any questions in regard to this matter.

Sincerely,

Jim Haynes, P.E.
Director, Division of Superfund
Tennessee Department of Environment and Conservation

JWH:mdd

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ADMINISTRATIVE RECORD

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