



**THE MEMPHIS DEPOT  
TENNESSEE**

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**ADMINISTRATIVE RECORD  
COVER SHEET**

**AR File Number** 790



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

May 11, 2004

Reply To  
4WD-FFB

Michael A. Dobbs  
Environmental Program Manager  
Defense Distribution Center  
DDC J-3/J-4E  
2001 Mission Drive  
New Cumberland, Pennsylvania 17070-5000

Re: EPA Comment on the Proposed Schedule Revision for the Memphis Depot

Dear Mr. Dobbs:

The U.S. Environmental Protection Agency has reviewed the referenced document, and has the following comments.

1. The dates proposed on the deliverables detailed in the proposed schedule are acceptable.
2. According to the FFA, a notification letter of the remedial action implementation start date (date of mobilization) is a primary document. As such, it should be included in the schedule. This is not a document for review, but is needed by EPA to document the start of remedial action, per Section 120 of CERCLA.
3. The schedule needs to provide for sitewide deliverables. For example, the site management plan (SMP) is a primary document, and the FFA specifies a particular timeframe for annual updates. As you know, the BCT has agreed to use the annual update of the BRAC Cleanup Plan as the SMP. FOSTs should also be included for planning purposes.
4. The Dunn Field schedule must provide for a land use controls implementation plan (LUCIP) to be submitted for review along with the remedial design (RD), as specified in the recent record of decision. Since the RD is being developed in phases, and the LUCIP pertains to all LUCs at Dunn Field, I recommend the LUCIP be developed as a stand-alone document, as was done for the Main Installation.
5. Please include notification letters for each phase of RA implementation, as in comment 1.

6. The next 5-year review is due before January 23, 2008. Although the FFA only calls for schedule to detail 3 years of deliverables (FY, FY+1, FY+2), I suggest including it as a placeholder, because the due date is a statutory one and not subject to extension.

I will be happy to discuss any of these comments with you to facilitate finalizing the schedule. If you have any questions, Please contact me at 404/562-8553.

Sincerely yours,

Wm. Turpin  
Ballard, RPM

Digitally signed by Wm. Turpin Ballard,  
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Federal Facilities Branch

Cc: Jim Morrison, TDEC

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