



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

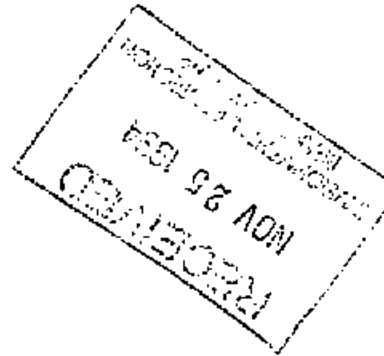
AR File Number 80

DDMT-DE

October 18, 1994

**SUBJECT:** Proposed Groundwater Action Plan (Proposed Plan), Defense Depot  
Memphis, Tennessee (DDMT), (October 1994)

Environmental Protection Agency  
ATTN: Ms. Martha Berry  
Region IV, Federal Facilities Branch  
345 Courtland Street, NE  
Atlanta, GA 30365



Dear Ms. Berry:

We have reviewed your comments, dated September 20, 1994, on the Proposed Plan. We concur with all but one of your comments and are revising the Proposed Plan accordingly. We expect to send, within a week, a final Proposed Plan for your concurrence.

We present a different perspective on your comment "The Engineering Report Removal Action for Groundwater (Engineering Report) should be renamed Focused Feasibility Study for Groundwater Containment at Dunn Field." We concur with the position that the collection and documentation of FFS-level field data is essential to the restoration process agreed to by the three agencies, EPA, TDEC and DoD. We envision a course of action which will meet every element of the process, though in a somewhat different form - essential in content - different only in presentation. Our view is based on several points as follows:

- a. Technical adequacy - the Engineering Report Removal Action for Groundwater does not embody all the components of a formal Focused Feasibility Study (FFS). Renaming would not make this document an FFS.
- b. Documents exist indicating the need/wisdom of early action to contain the Dunn Field contaminated plume. We will issue an acceptable final Engineering Report (additional documentation). The Proposed Plan, framed in the Observational Approach, together with the Remedial Investigation (RI) will collect and document the FFS criteria not adequately addressed in the Engineering Report.

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c. The Engineering Report was prepared under contract by Engineering Science, Inc. (ES). That contract has been completed; an ES rework is therefore impractical. Any attempt to restructure this document to a formal FFS will take 6 to 12 months, or more. Such delay will negate the early action benefits/intent of the Proposed Plan.

We will incorporate EPA and TDEC comments and issue the Engineering Report, as it is named, prior to issuing the Proposed Plan.

We need to fulfill our commitment to the public as announced several times to the Restoration Advisory Board. We've lead the populace to expect that within about one year we will be pumping water to contain the contaminated plume in Dunn Field. Our strategy maintains the integrity of regulatory policy providing effective remediation based on sound scientific principles. The action is consistent with EPA, TDEC and DoD policy to expedite remediation. Week before last Congress cut \$400M from the DERA budget; we must maximize the "bang for the buck" in order to effectively serve the public. Existing technical data documentation is sufficient to continue with the Proposed Plan.

DDMT will bear responsibility for proceeding with the Proposed Groundwater Action without a formal Focused Feasibility Study. We will furnish you a schedule for completion of the Engineering Report on October 20, 1994. If your Agency takes exception to our plan, or can offer improvements, please furnish written notice by October 24, 1994.

Sincerely,

FRANK NOVITZKI  
DDMT Project Manager

CC: TDEC, Jordan English

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