



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 813



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File: C.H. 541.460.000 g  
AR # 813

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

November 12, 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: Remedial Action Work Plan (RAWP) for Early Implementation of Selected Remedy at  
Dunn Field (Operable Unit 1), Defense Depot, Memphis, Tennessee (DDMT)

Dear Mr. Dobbs:

The U.S. Environmental Protection Agency, Region 4, has reviewed the referenced document and hereby approves it, subject to the following understanding.

Several sections in the RAWP refer to the project objective for Treatment Area 1 as being 90% reduction in concentrations of 1,1,2,2 tetrachloroethane (1,1,2,2 PCA) and trichloroethene (TCE). Although these *are* the major contaminants of concern (COC) for this phase of the remedial action, they are not the only COCs identified in the Record of Decision (ROD) for Operable Unit 1. In addition, the ROD did not specify 90% reduction in concentration as a remedial action objective (RAO) for ground water, nor did the technical memorandum (TM) approved by the BRAC Cleanup Team (BCT), on which the present work plan is based. I believe all parties to the DDMT Federal Facilities Agreement understand that the RAO's in the ROD are the overall cleanup objectives that the remedy is expected to achieve.

It is apparent from the statement of work between your prime contractor and its main subcontractor that 90% reduction is a contractual minimum that the subcontractor warrants it will achieve. This is acceptable, based on the results of the recent treatability study for zero-valent iron. However, EPA approval of this work plan does not constitute acceptance of 90% concentration reduction as an alternative RAO to those already approved in the ROD. If you have any questions, Please contact me at 404/562-8553.

Sincerely yours,

Wm. Turpin  
Ballard, RPM

Wm. Turpin Ballard, RPM  
Federal Facilities Branch

Digitally signed by Wm. Turpin Ballard, RPM  
DN: CN = Wm. Turpin Ballard, RPM, C =  
US, O = U.S. EPA Region 4, OU = Federal  
Facilities Branch  
Reason: I am the author of this document  
Date: 2004.11.12 13:22:24 -0500

Cc: Jim Morrison, TDEC

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