



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 912



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DEFENSE LOGISTICS AGENCY
DEFENSE DISTRIBUTION CENTER
2001 MISSION DRIVE
NEW CUMBERLAND, PA 17070-5000

File: M.D. 541.460.0009
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IN REPLY
REFER TO

DDC-DES-EE

7 November 2007

Mr. Turpin Ballard
Environmental Protection Agency, Region 4
Office of Solid Waste
Federal Facilities Branch
61 Forsyth Street, SW
Atlanta, GA 30303

Mr. Jamie Woods
Tennessee Department of Environment and Conservation
Division of Remediation
2510 Mt. Moriah Road, Suite E645
Memphis, Tennessee 38115-1520

Subject: Request for Extension in Dunn Field Off-Depot Remedial Design

Dear Sirs:

As provided in Section XXII of the Defense Depot Memphis Tennessee (DDMT) Federal Facilities Agreement (FFA), the Defense Logistics Agency (DLA) hereby requests an extension to the schedule for the Final Off-Depot Groundwater Remedial Design (RD) document. An extension of 182 days is requested, which will change the Final RD submittal date of 17 November 2007 to 17 May 2008.

A previous request for extension was submitted on 28 October 2006. New information on hydrogeology and contaminant extent supported the extension to reevaluate the zero valent iron (ZVI) permeable reactive barrier (PRB) as the primary component of the groundwater remedy. Specifically, the extension was requested by DLA to conduct a microcosm study to evaluate enhanced bioremediation as the Off-Depot treatment technology and to incorporate that technology into the Off-Depot RD. In addition to the microcosm study, DLA conducted an investigation of the intermediate aquifer both to assess the potential for vertical migration of chlorinated volatile organic compounds (CVOCs) and to complete the Dunn Field groundwater model.

Since October 2006, DLA has continued to move forward with enhanced bioremediation as the alternative to a ZVI PRB, and has submitted the following documents to USEPA and TDEC:

- Dunn Field Revised Proposed Plan, Rev. 0, June 2007
- Dunn Field ROD Amendment, Rev. 0, July 2007



- Dunn Field Off-Depot Groundwater Pre-Final Remedial Design, Rev. 0, July 2007
- Dunn Field Revised Proposed Plan, Rev. 1, September 2007

More importantly, the Dunn Field Source Areas remedial action (RA) is underway and is expected to improve downgradient groundwater quality. From late July and through October 2007, the fluvial sands soil vapor extraction (SVE) system has removed approximately 1,200 pounds of CVOCs. Excavation of contaminated soils and preparation for implementation of thermal-enhanced SVE in the loess is currently underway. Loess treatment is expected to be complete by mid- to late-2008. ZVI will be injected into groundwater in the Dunn Field source areas in 2009.


Initial groundwater modeling to support the Off-Depot Groundwater RD suggested that the Off-Depot plume may be migrating down to the intermediate aquifer. Based on this, the BCT agreed to conduct an intermediate aquifer investigation to evaluate the hydraulic connectivity of the fluvial and intermediate aquifers. Under Section XXII.B.5 of the FFA, DLA believes this agreement constitutes good cause for this extension request because completing the groundwater model is critical for finalizing the Off-Depot Groundwater RD. DLA has completed the field work and is evaluating the data from the intermediate aquifer study, which will be used to complete the Off-Depot groundwater model. This model is a critical component of the natural attenuation portion of the Off-Depot remedy. As outlined below, the length of the extension needed to analyze the data, revise the groundwater model, and complete the Off-Depot Groundwater RD is 182 days.

Task	Duration	Start	Finish
Intermediate Aquifer Study			
Complete Field Effort	21 Days	11/1/07	11/22/07
Analyze Samples and Complete Data Interpretation	60 Days	10/16/07	12/14/07
Develop and Submit Intermediate Aquifer Investigation TM	60 Days	11/12/07	01/11/08
Groundwater Model			
Revise Model Based upon Intermediate Aquifer Investigation TM	90 Days	10/12/07	01/11/08
Develop and Submit Groundwater Model TM	29 Days	01/11/08	02/08/08
Completion and Submittal of Final Off-Depot Groundwater RD	120 Days	01/25/08	05/17/08

This extension for the RD will result in delays for the Off-Depot Remedial Action Work Plan (RAWP), Notice of Remedial Action Implementation, and associated remedial activities and reports. The Master Schedule for DDMT is currently being revised for the BRAC Cleanup Plan (BCP), Version 11, which serves as the Site Management Plan required by FFA Section XXI. The revised dates for the Off-Depot activities and documents are as follows:

Task	BCP V10	BCP V11
Submit Final Off Depot Groundwater RD, Rev. 0	16 November 2007	17 May 2008
Submit Revised Proposed Plan, Rev. 1	18 September 2007	1 June 2008
Submit Off Depot Groundwater RAWP, Rev.0	17 December 2007	16 July 2008
Public Comment/Meeting Period Close	31 December 2007	29 October 2008
ROD Amendment Rev 1 Submitted	16 January 2008	28 November 2008
Final ROD Amendment Signed	29 April 2008	27 April 2009
Notice of Off Depot GW RA Implementation	21 August 2008	14 May 2009
Submit Off Depot GW Interim RACR, Rev. 0	23 January 2010	16 October 2010
Off Depot GW RA Complete/Remedy In Place	11 October 2010	4 July 2011

Should you have any questions regarding this request, please don't hesitate in contacting me at (717) 770-6950 or the e²M Project Manager, Tom Holmes, as (404) 237-3982.



MICHAEL DOBBS
Chief
Environmental Safety
and Occupational Health

cc: CH2M HILL (Nelson)
e²M (Holmes)
Noblis (Miller)

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