



THE MEMPHIS DEPOT TENNESSEE

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 922



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

January 29, 2008

Michael A. Dobbs
Environmental Program Manager
Defense Distribution Center
S Avenue, Bldg. 1-2
DES-DDC-EE
New Cumberland, PA 17070-5000

Re: EPA comments on BRAC Cleanup Plan, Version 11 (BCP) for the Former
Memphis Depot (DDMT), Memphis, Tennessee

Dear Mr. Dobbs:

Attached please find comments by the U.S. Environmental Protection Agency, Region 4 (EPA) on the BRAC Cleanup Plan version 11 / FY08 Site Management Plan for the Former Memphis Depot (DDMT). The review considers the schedule extensions approved in November 2007 for several of the primary documents under our Federal Facilities Agreement (FFA). Due to the timeframes under which this review takes place, please be advised that any deadlines in FY 08 through FY10 for primary documents proposed in the Rev. 0 Master Schedule (Figure 5-1) and the Major Milestones (Table 5-1) that are not changed or called into question by comments herein provided are considered approved as final, and enforceable under the FFA.

Due to the dynamic nature of some of the activities being undertaken at DDMT, EPA recommends a mid-year schedule review in April to determine whether changes to the FY08 Master Schedule are appropriate and acceptable to the FFA Parties.

If you have any questions, please contact me at 404/562-8553.

Sincerely yours,

A handwritten signature in black ink, which appears to read "Wm. Turpin Ballard", is written over a horizontal line.

Wm. Turpin Ballard, RPM
Federal Facilities Branch

Cc: Jamie Woods, DOR/TDEC/Memphis

**EPA COMMENTS ON THE DDMT
BRAC CLEANUP PLAN, VERSION 11**

1. **Master Schedule, Line Items 6-13, MI Source Area Soil Investigation:** Line items 8 and 12 only provide for a 30-day BCT review. The FFA allows a 60-day review for these types of documents (RI work plans). Please adjust dates accordingly.
2. **Master Schedule, lines 23-42, Dunn Field Revised Proposed Plan and ROD Amendment:** Typically, these two types of documents are primary documents under the FFA. However, as there is no requirement for DLA to change a remedy, EPA recommends that the schedule for these documents be determined after the agencies agree on the scope of the changes to the Dunn Field remedy, *including any proposed adjustments to soil cleanup levels* that require public input under CERCLA and need documentation in a ROD Amendment. For example, by the time the document goes to public comment under the draft Master Schedule, the thermal loess treatment is scheduled to be completed. It would therefore be more appropriate to document that, and any other completed remedy modifications, in an "Explanation of Significant Differences" (ESD) portion of the ROD amendment, rather than solicit comment on a completed action. EPA recommends a detailed scoping of the revised proposed plan and ROD amendment as soon as is practicable to allow the earliest possible completion of the public involvement process. This scoping should not take place later than our April 3, 2008 BCT meeting.
3. **Line Item 89:** Please justify the need for a second round of post-treatment ground water sampling in order to scope the extent of treatment needed for source groundwater. When the initial round of scoping samples is collected in September 2008 the flux of contamination from the vadose zone will already have been prevented by the fluvial SVE system for 14 months. This should provide sufficient information to scope the extent of groundwater treatment and allow for earlier implementation of necessary actions.
4. **Line Item 115:** Please note that per the BCT meeting January 24, 2008, EPA will expect the groundwater model technical memorandum to include importable electronic files so that DLA's modeling results can be validated by our reviewers.
5. **Line Items 130-134, Off-Depot Property Access Agreements:** While this is not, in itself, an enforceable milestone it certainly can affect more than one. EPA suggests that DLA initiate property access activities sooner. It appears that these line items hinge on completion the Rev. 0 Final Off-Site RD. There is no need to wait for that because we already know the vast majority of the area to which we need access for implementing an off-site remedy, and lack of access should not be used as good cause for any future extension request.
6. **Line Item 175, CY 2008 IRA Operations:** As provided in the Dunn field ROD, the IRA is be mothballed once source groundwater treatment is in place. Please add appropriate activities to reflect this in the schedule.

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