



# THE MEMPHIS DEPOT TENNESSEE

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## ADMINISTRATIVE RECORD COVER SHEET

AR File Number 931



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

March 5, 2008

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

Re: BRAC Cleanup Plan (BCP), Version 11/Site Management Plan and Annual Schedule  
Update for the Defense Depot, Memphis, Tennessee (DDMT)

Dear Mr. Dobbs:

The U.S. Environmental Protection Agency, Region 4 (EPA) has reviewed the referenced document and finds it to be adequate for the purpose. The document is hereby approved, with the following exception.

In Figure 5-1, the Master Schedule, and Table 5-1, Major Milestones, the schedule for the Revised Proposed Plan and ROD Amendments for the Dunn Field ROD is not approved. There is no requirement for DLA to amend a remedy, although the cumulative changes made to date suggest it would be appropriate to document the post-ROD changes in some form consistent with EPA ROD guidance. At the same time there is too much uncertainty about the scope of a revised remedy to establish an enforceable schedule at this time. For example, DLA has suggested it may want to change the soil cleanup levels for loess and fluvial vadose zone soils, but hasn't taken that any further. Such a change would have to go into the amendment after approval by EPA. DLA has suggested that monitored natural attenuation for the off-site plume might be appropriate, but hasn't submitted any technical documentation to support this. EPA can only entertain a proposal to amend the Dunn Field ROD after a proper basis for the changes is developed, reviewed, and approved. To approve this now puts DLA at unnecessary risk of missing a deadline for a primary document.

EPA recommended postponing this part of the schedule in its comments on Rev. 0 of the BCP, but DLA preferred not to change the schedule. It will be cleaner in the long run to remove these line items from Figure 5-1 and Table 5-1 and establish them as a separate schedule under the FFA once the scope has been agreed upon by all parties.

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

Sincerely yours.

**Wm. Turpin  
Ballard**

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**Wm. Turpin Ballard, RPM  
Federal Facilities Branch**

**Cc: Jamie Woods, TDEC/Memphis**

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