



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT**  
**600 ARMY PENTAGON**  
**WASHINGTON, DC 20310-0600**

DAIM-ODB

March 10, 2015

MEMORANDUM FOR: DIEDRE LLOYD (USEPA-Region 4)

SUBJECT: Supplemental Remedial Investigation Phase 1 Work Plan – Rev. 0,  
Defense Depot Memphis, Tennessee

Ms. Lloyd,

Army agrees to a 20-day extension of the comment period per your request; comments on the SRI Work Plan are due March 26, 2015. Note that this extension will result in extensions to all subsequent dependent activities. In addition, Army points out the following discrepancies from the FFA in your request:

- Your extension request references Section XXII.G.2 of the FFA (there is no subdivision of XXII.G). Section XXII addresses extension requests by Army (previously DLA) and does not contain provision for extension of document review by EPA or TDEC.
- Subsection B.3 in Section XV. *Consultation Process for Primary and Secondary Documents* provides for a 20-day extension of the comment period, “in cases involving complex or unusually lengthy documents” and when the request is submitted “by written notice ... prior to the end of the comments period”. There is no other provision for extension of regulatory comment periods in the FFA. Given the documents envisioned in the FFA, the SRI Work Plan is not a complex or unusually lengthy document and the request was received after the 60-day comment period.

Army does not wish to be overly legalistic in regard to the FFA but lack of timely review impacts project activities. Army appreciates review of project documents by the regulatory agencies and intends that environmental restoration activities be conducted with consensus from all parties.

We look forward to the upcoming conference call.

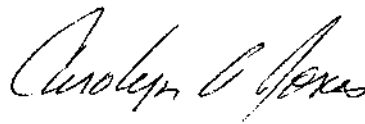
Prior to the conference call, Army wishes to point out the status of other recent documents:

- The RAO-LTM QAPP, Rev1 was submitted December 3, 2014 and the comment period ended February 5, 2015. Comments were received from TDEC and Army responses have been approved. The QAPP will be revised per the responses and considered final.

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- Responses to EPA and TDEC comments on the 2015 SMP were submitted February 17. No reply has been received. The Army intends to revise the SMP in accordance with the responses. Any comments on the responses should be provided this week.
- The 2014 LTM report was submitted February 11, 2015; comments are due April 13.

For more information, please contact the HDR Project Manager, Tom Holmes, at (404) 295-3279.



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