



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

13 June 2024

SUBJECT: Request Extension for the submission date of the Draft Proposed Plan for Groundwater Remedial Work at the Main Installation (MI) at the former Defense Depot Memphis, Tennessee (DDMT).

Mr. Fernando Martinez-Torres,
U.S. Environmental Protection Agency (USEPA) Region 4

Dear Mr. Martinez-Torres

The Army respectfully requests an extension of the due date for the Draft Proposed Plan (PP) for groundwater remedial work at the DDMT Main Installation from 11 June 2024 to 10 October 2024.

Please reference the EPA email correspondence provided on 12 June 2024 (1:11 PM Eastern and 1:26 PM Eastern).

Good Cause for Extension: The Focused Feasibility Study (FFS) for the MI groundwater has gone through a long series of comment and response cycles since initial submission. The Army team desires to achieve consensus on the FFS prior to preparation of the PP. However, as you are aware, the extended review cycles that EPA requested significantly contributed to delaying the start date for the PP. The 2024 Site Management Plan (SMP) schedule was prepared with the understanding that the FFS Final (Revision 1) would be submitted on the 3rd of May. The Army team is preparing a Draft Final (Revision 1) version of the FFS which we will assume is the consensus version.

During the DDMT Site Management Team call on 11 June 2024, the need for an extension request was mutually discussed and a timeline of 20 days to provide an extension submission was suggested as reasonable by EPA. However, the Army received your email with a threat of dispute, and stipulated damages with only one business day to respond, over the previously discussed extension request timeline.

The Army is anxious to work collaboratively with EPA and believed we had worked the extension issue during our meeting, and if a change in the process was needed this could have been communicated without the threat of stipulated penalties. We have a long and productive history mutually together at this site. However, compressing the response schedules without reasonable notice is not conducive to achieving our mutual goals for responding to unacceptable residual risks at the Main Installation.

We request and would appreciate EPA approval for the Army's extension request. Please advise if you have questions or the Army can provide any additional information. Our point of contact is: Mr. Bill Millar, BRAC Environmental Coordinator at (703) 819-0100, email: william.w.millar.ctr@army.mil.

Sincerely,



JAMES C. FOSTER
Program Manager,
Base Realignment and Closure
Office of the Deputy Chief of Staff, G-9

Encl

Courtesy Copy: Mr. Jamie Woods, Tennessee Department of Environment and Conservation (TDEC)