



REGION 4

ATLANTA, GA 30303

11/8/2024

Mr. James Foster
Department of the Army
Office of the Deputy Chief of Staff, G9
Base Realignment and Closure Branch, ISE Division
600 Army Pentagon
Washington, DC 20310-0600

Dear Mr. Foster,

I am writing in response to your request dated October 17, 2024, for a 6-month extension to revise the Focused Feasibility Study (FFS) and related documents. The United States Environmental Protection Agency (EPA) has previously expressed concerns to the United States Army (Army/lead agency) regarding the FFS, particularly about the reliance on Monitored Natural Attenuation (MNA) as part of the remediation strategy. Specifically:

- In a letter dated June 5, 2023, during discussions surrounding the FFS, the EPA indicated that MNA needed to be removed from the language of the FFS and alternatives.
- Following this request, on October 24, 2023, the Army agreed to remove MNA from the proposed remedies.
- The FFS was conditionally approved by the EPA on July 2, 2024, allowing progress on the Revised Proposed Plan while still being subject to further evaluation.

Too, after careful consideration of your proposal and recognizing the need for an Explanation of Significant Differences (ESD) for the Dunn Field West area, we have decided on the following course of action:

1. Extension Period

We are granting a 45-day extension for the submittal of responses to EPA comments on the Revised Proposed Plan, Draft Final, and Final versions for the Main Installation.

2. Additional Time and EPA Concerns

An additional 34 days (from the date of this letter) are provided to address the EPA's concerns over the FFS for the Main Installation. These concerns include:

- Continued reliance on natural attenuation (i.e., dilution, dispersion) as part of the presumptive remedies and remediation strategy.
- The need to recalculate times for achieving Maximum Contaminant Levels (MCLs) to meet Remedial Action Objectives (RAOs) and comply with Applicable or Relevant and Appropriate Requirements (ARARs), without relying on natural attenuation processes.
- Lack of clear demonstration of degradation rates for contaminants as they migrate into different aquifers.
- Absence of a vertical concentration map demonstrating expected contaminant concentrations at various depths and distances.

3. Dunn Field West ESD Requirements

Given that an action memo is deemed insufficient for the Dunn Field West area, we request that you propose dates for the following:

a) Submittal of documentation necessary to support the ESD, including but not limited to:

- Updated site characterization data
- Revised risk assessment (if applicable)
- Proposed changes to the remedial action and their justification
- Analysis of how the proposed changes affect the original Record of Decision (ROD)

b) A timeline for the ESD review process, including:

- Draft ESD submission date
- Public comment period (45 days, as per FFA)
- Final ESD submission date

4. Deadlines for Main Installation

a) Revised FFS addressing EPA concerns: 34 days from the date of this letter.

b) Responses to EPA comments on the Revised Proposed Plan: 45 days from the date of this letter.

c) Final versions: 120 days from the approved submittal date from each initial draft version of the documents.

d) Please include in your proposed timeline for Dunn Field West ESD a plan for public involvement, including any proposed community meetings or information sessions. This should align with Federal Facilities Agreement (FFA) requirements.

Please submit your proposed timeline for Dunn Field West ESD process within 14 days of receipt of this letter. Any future timelines should be considered for inclusion in the 2025 Site Management Plan (SMP), which is expected to be released on November 30, 2024.

The EPA commends the Army for its efforts on further investigating the DDMT environmental conditions. If you have any questions about this letter, please contact me via email at martinez-torres.fernando@epa.gov or at 404-695- 4991.

Sincerely,

Fernando Martinez Torres
Remedial Project Manager
Department of Defense Section
Superfund & Emergency Management Division
United States Environmental Protection Agency

cc: Jamie A. Woods, TDEC
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