



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

02 December 2024

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MEMORANDUM FOR

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

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

SUBJECT: Response to EPA Letter dated 08 November 2024 discussing the schedule for submission of the Main Installation GW FFS RTCs and revised FFS; and RPP, Defense Depot Memphis, Tennessee

Thank you for your letter dated 08 November 2024 and received on 09 November 2024 via email providing conditional approval for the Army's extension request. While your letter covers many subjects, this response is about the dates for submission of the next revision of the Defense Depot Memphis (DDMT) Main Installation (MI) groundwater Focused Feasibility Study (FFS) and Revised Proposed Plan (RPP). EPA decided to allow a 34-day extension for the FFS and a 45-day extension for the RPP. After verbal confirmation from EPA that a new alternative in the FFS would not be required, the Army's request for an additional six months to draft the revision will not be necessary. However, the Army cannot submit this document on the accelerated timeline EPA provided. The Federal Facility Agreement (FFA) states that the Army is allowed up to 60 days to respond to comments. The most recent comments on the FFS were provided by EPA via letter dated 08 November 2024 but not received by Army until 14 November 2024 (because the letter was emailed late in the evening of 13 November 2024) so the response to comments (RTC) will be submitted by 13 January 2025. Once the RTCs are approved by EPA, up to 60 days, as allowed by the FFA, will be required to submit the revised FFS.

To facilitate consensus on the RTC, the Army suggests a conference call with the EPA technical team to discuss the technical issues that are preventing agreement on the document. The Army suggests a one-to-two-hour session on TEAMS to review the work done at the site previously and work to be completed in the remedial alternatives proposed in the FFS. The goal is to reach agreement on the comments and responses before the RTC is submitted. We suggest that James, Kevin, Shannon, Mac and any other EPA representatives that are appropriate be on the call with the Army technical team. A call in early December would make sense based on due dates. Please let us know about availability for the call.

Regarding EPA's requirement that the RPP be submitted 45 days from the date of receipt (09 November 2024) of the letter, the Army cannot complete the draft of the RPP until the FFS is finalized. As the Army has stated previously, the RPP and ROD Amendment rely on the FFS and cannot be submitted in draft until the FFS is final. The date of submission of the RPP is contingent on EPA approval of the FFS.

If you have any questions or comments, please contact Bill Millar at 703-819-0100 or e-mail at [william.w.millar.ctr@army.mil](mailto:william.w.millar.ctr@army.mil).

Thank you.

for

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