

**Shelia Mcfalls**

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**From:** HENNESSEY, BRIAN  
**Sent:** Tuesday, May 07, 2019 10:18 AM  
**To:** Jon Richards (richards.jon@epa.gov); Fulmer, Susan  
**Cc:** pope.robert (epa.gov); Cathcahe (dhec.sc.gov); Shelia Mcfalls; Mike Griffith; James Kubar; Dena Brett  
**Subject:** Lower Three Runs IOU Feasibility Study  
**Attachments:** Ext Not&Req FS&PP Apr19.pdf

Jon and Susan,

SRS recently notified you by the attached letter of a 30-day extension to our revision of the Rev.1 FS for the Lower Three Runs IOU (originally due on May 8), resulting in a June 7, 2019 due date for the Rev.1.1 FS. The notification also requested extension of the Proposed Plan submittal to July 27, which you approved.

After discussion with EPA last week of a formal dispute between DOE-EM-Oak Ridge and EPA over an ARAR for aqueous discharges from a CERCLA landfill, and the potential impact of that dispute on ARARs for the excavation alternative in the LTR IOU FS, **we would like to suspend the June 7 submittal date for the Rev.1.1 FS.** (Please note that the original May 8 date was based on our expectation of a 30-day revision period after receiving EPA's comments on the Rev.1 FS, as there is not an FFA-required timeframe for the revision of Rev.1 documents.) Until the outcome of the dispute is known, the ARAR remains indeterminate for the excavation alternative and the FS cannot be finalized. A date for submittal of the Rev.1.1 FS will be determined by the Core Team.

Depending on when the dispute is resolved and the FS can be revised, it is also likely that SRS will request another extension of the Proposed Plan due date (currently July 27).

Please let us know if you have any concerns or if you'd like to discuss the rationale for this notification. Thank you.

**Brian T. Hennessey | Federal Facility Agreement Program Manager, DOE-Savannah River**

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*"A problem well-stated is half solved." - Charles Kettering, American Inventor*



**Department of Energy**  
Savannah River Operations Office  
P.O. Box A  
Aiken, South Carolina 29802

**APR 11 2019**

Ms. Susan B. Fulmer, P. G., Manager  
Federal Remediation Section  
Division of Site Assessment, Remediation and Revitalization  
Bureau of Land and Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201

Mr. Jon Richards  
Acting Savannah River Site Remedial Project Manager  
Superfund Division  
U. S. Environmental Protection Agency, Region 4  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

Dear Ms. Fulmer and Mr. Richards:

**SUBJECT:** Thirty-Day Extension Notification for the Feasibility Study (SRNS-RP-2018-00199, Redline Revision 1.1) and Second Extension Request for the Submittal of the Proposed Plan (SRNS-RP-2019-00058, Revision 0) and Subsequent Milestones for the Lower Three Runs Integrator Operable Unit, SEMS Number: 35

In accordance with the terms of Section XXII.G.6 of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is providing a thirty-day extension notification for submittal of the Lower Three Runs (LTR) Integrator Operable Unit (IOU) Feasibility Study (FS) (SRNS-RP-2018-00199, Redline Revision 1.1). The additional thirty days will extend the submittal date from May 8, 2019 to June 7, 2019. The additional time is required to address the U. S. Environmental Protection Agency's (EPA) comments on the FS that were received on April 8, 2019.

In addition, in accordance with the terms of Section XXXI of the FFA, the DOE is requesting an extension for submittal of the LTR IOU Proposed Plan (PP) (SRNS-RP-2019-00058, Revision 0) and subsequent milestones.

Schedule That Is Sought to Be Changed and/or Extended

The LTR IOU Revision 0 PP submittal scheduled for April 29, 2019 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the LTR IOU Revision 0 PP submittal for ninety (90) days from April 29, 2019 to July 29, 2019.

Ms. Susan Fulmer  
Mr. Jon Richards

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Cause of The Extension

This extension is being sought under the terms of the FFA Section XXXI.B.5: "A delay caused by additional work agreed to by the Parties."

Because of comments provided by the EPA during the review of the LTR IOU FS (SRNS-RP-2018-00199, Revision 1 Redline, January 2019), additional time is required to address the FS comments, obtain regulatory approval on the comment responses, and incorporate the changes into the PP. The comments on the FS were received on April 8, 2019.

Related Commitments or Schedules That Will Be Impacted by The Granting of The Extension

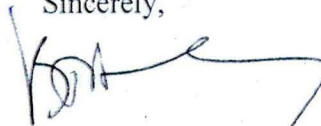
The granting of this extension will impact additional milestones that occur after the PP submittal. Those milestones, along with their current and proposed dates, are listed below.

<b>Milestone</b>	<b>Current Date</b>	<b>Proposed Date</b>
Revision 0 Proposed Plan	April 29, 2019	July 29, 2019
Revision 0 Record of Decision (ROD)	December 16, 2019	March 16, 2020
Issue ROD	August 25, 2020	November 23, 2020
Revision 0 Remedial Action Implementation Plan	February 3, 2021	No Change
Revision 0 Land Use Control Implementation Plan	February 3, 2021	No Change
Remedial Action Start	November 28, 2021	No Change
Revision 0 Post-Construction Report/Remedial Action Completion Report	June 15, 2023	No Change

Please review the information contained in this extension request and provide your response by April 26, 2019. The effort and time that the EPA and the South Carolina Department of Health and Environmental Control have given on the subject operable unit are greatly appreciated.

Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,



Brian T. Hennessey  
SRS Remedial Project Manager  
Infrastructure and Area Completion Division

Ms. Susan Fulmer  
Mr. Jon Richards

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cc:

D. Scaturo, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office  
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