



Department of Energy
Savannah River Operations Office
P.O. Box A
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SEP - 5 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: Second Extension Request for the Submittal of the RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (SRNS-RP-2019-00394, Revision 0) SEMS Number: 63

In accordance with the terms of Section XXXI of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is requesting an extension for submittal of the information indicated in the subject line above. This request is result of the D-Area Groundwater Work Plan Scoping meeting that was held on August 29, 2019.

Schedule That Is Sought to Be Changed and/or Extended

The Resource Conservation and Recovery Act (RCRA) Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (SRNS-RP-2019-00394, Revision 0) scheduled for submittal on September 11, 2019.

Length of Extension Requested

The DOE proposes to temporarily suspend the submittal of the RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (SRNS-RP-2019-00394, Revision 0) until a revised implementation schedule can be developed and agreed to by the Core Team (DOE, U.S. Environmental Protection Agency [EPA] and South Carolina Department of Health and Environmental Control [SCDHEC]).

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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."

The Core Team has agreed that additional time for the submittal of this document is necessary due to the size and complexity of the unit, the large amount of data being reviewed, and the uncertainty of the potential contaminants of concern(s) associated with the remaining D-Area Operable Unit surface units. Specifically, the implementation of the Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis for D-Area Coal Storage Area (484-17D), the Treatability Study Work Plan for Groundwater Injection and Discharge Canal Treatment at the D-Area Groundwater Operable Unit, and the demolition of the 484-D Power House and associated structures has not begun, with the impacts of these efforts indeterminate at this time. DOE will schedule an additional Work Plan scoping meeting to be held before March 31, 2020 with the EPA and SCDHEC that will include a discussion regarding the overall implementation schedule. A new submittal milestone for the RCRA RFI/RI Work Plan for the D-Area Groundwater Work Plan (Revision 0) will be established at the scoping meeting.

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

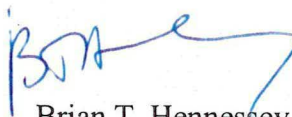
The granting of this extension is not expected to impact subsequent milestones for this operable unit. In the near term, the D-Area Groundwater Operable Unit RFI/RI Field Start FFA milestone scheduled for June 30, 2020 will not be delayed and will be recognized as met with the installation of monitoring wells that have been agreed upon. The installation of these wells is planned to begin in 1QFY2020.

DOE will submit a letter workplan prior to the installation of the monitoring wells for EPA and SCDHEC review, comment, and approval. The letter workplan will be submitted by October 17, 2019. The approved letter workplan will authorize the RFI/RI Field Start.

Please review the information contained in this extension request and provide your response by September 11, 2019. The effort and time that the EPA and the SCDHEC 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, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,



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

IACD-19-180

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Mr. Jon Richards

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cc:

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