



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

AUG 23 2018

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: Extension Request for the Early Action Statement of Basis/Proposed Plan for the D-Area Operable Unit (SRNS-RP-2017-00723, Revision 1) and Subsequent Milestones

In accordance with the terms of Section XXXI. Extensions of the Federal Facility Agreement (FFA), the U.S. Department of Energy (DOE) is requesting an extension of the submittal of the Early Action Statement of Basis/Proposed Plan (SB/PP) for the D-Area Operable Unit (DAOU) (SRNS-RP-2017-00723, Revision 1) and subsequent documents.

Schedule that is Sought to be Changed and/or Extended

The submittal of the Early Action SB/PP for the DAOU (SRNS-RP-2017-00723, Revision 1) and subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the submittal date of the Early Action SB/PP for the DAOU (SRNS-RP-2017-00723, Revision 1) from October 12, 2018 to October 25, 2019.

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 SRS received comments from South Carolina Department of Health and Environmental Control (SCDHEC) on April 4, 2018. Due to concerns with the current schedule and milestones, the U.S. Environmental Protection Agency (EPA) emailed draft comments on the Early Action SB/PP (SRNS-RP-2017-00723, Revision 0) on May 15, 2018 to facilitate discussions regarding the schedule. A conference call was held on May 21, 2018 to discuss the draft comments and the current schedule. Based on the May 21, 2018 discussions, DOE agreed to develop, submit, and obtain approval of a Human Health (HH) and Ecological (ECO) Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins (i.e., data summary report) and a Focused Corrective Measures Study/Feasibility Study (CMS/FS) Letter before proceeding with the Early Action SB/PP (SRNS-RP-2017-00723, Revision 1). As discussed during the May 21, 2018 meeting, the Focused CMS/FS letter will only evaluate two alternatives: No Action and Land Use Control with Monitoring. DOE also agreed to complete the Removal Action Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin before submittal of the Revision 0 Second Early Action Record of Decision (ROD) for the DAOU. The SRS received final comments from EPA on August 13, 2018.

Additional time is needed to comply with EPA's request for the additional documents. DOE currently plans to submit the HH and ECO Evaluation for Confirmation Sampling at the 488-1D Ash Basin and Inlet Basins on October 15, 2018 and the Removal Action Report for 488-1D Ash Basin and 489-D Coal Pile Runoff Basin on September 3, 2019.

[Note: EPA requested that data reports be provided for all the DAOU subunits. The HH and ECO Evaluation for Confirmation Sampling at the 488-2D Ash Basin (ERD-EN-2015-0053, Revision 1, October 2016) and HH and ECO Evaluation for Confirmation Sampling at the 489-D Coal Pile Runoff Basin (ERD-EN-2017-0027, Revision 1, October 2017) have been approved by SCDHEC and EPA.]

Related Commitments or Schedules that will be Impacted by the Granting of the Extension

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

Milestone	Current Date	Proposed Date
Revision 0 Focused CMS/FS Letter*	Not Applicable	April 22, 2019
Revision 1 Early Action SB/PP	October 12, 2018	October 25, 2019
Revision 0 Second Early Action ROD	October 2, 2018	February 18, 2020
Issue Second Early Action ROD	July 1, 2019	November 10, 2020
Revision 0 Second Early Action Land Use Control Implementation Plan	July 3, 2019	November 30, 2020
Remedial Action Start	May 31, 2020	September 3, 2021
Revision 0 Second Early Action Post-Construction Report*	Not Applicable	May 9, 2022

* This milestone was not originally included in the DAOU implementation schedule. As noted on the implementation schedule, the Focused CMS/FS letter has an expedited regulatory review cycle.

Ms. Susan B. Fulmer
Mr. Jon Richards

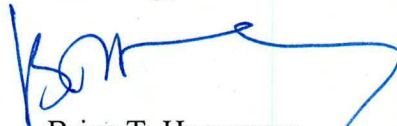
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Please review the information contained in this extension request and provide your response within fourteen (14) business days of receipt. The effort and time that the EPA and SCDHEC have given on the subject report are greatly appreciated.

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

IACD-18-174

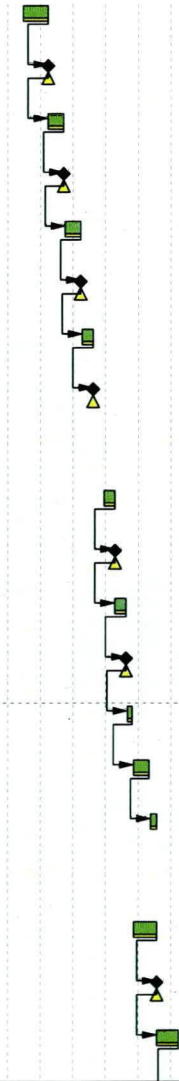
Enclosure:
D-Area Operable Unit Implementation Schedule

cc w/o encl:
G. K. Taylor, SCDHEC-Columbia
D. Scaturo, SCDHEC - Columbia
S. French, SCDHEC - Columbia
M. D. Wilson, SCDHEC - Columbia
G. O'Quinn, SCDHEC - Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/encl:
D. Lloyd, EPA-Atlanta
M. McRae, TechLaw, Inc.

D-Area Operable Unit Implementation Schedule

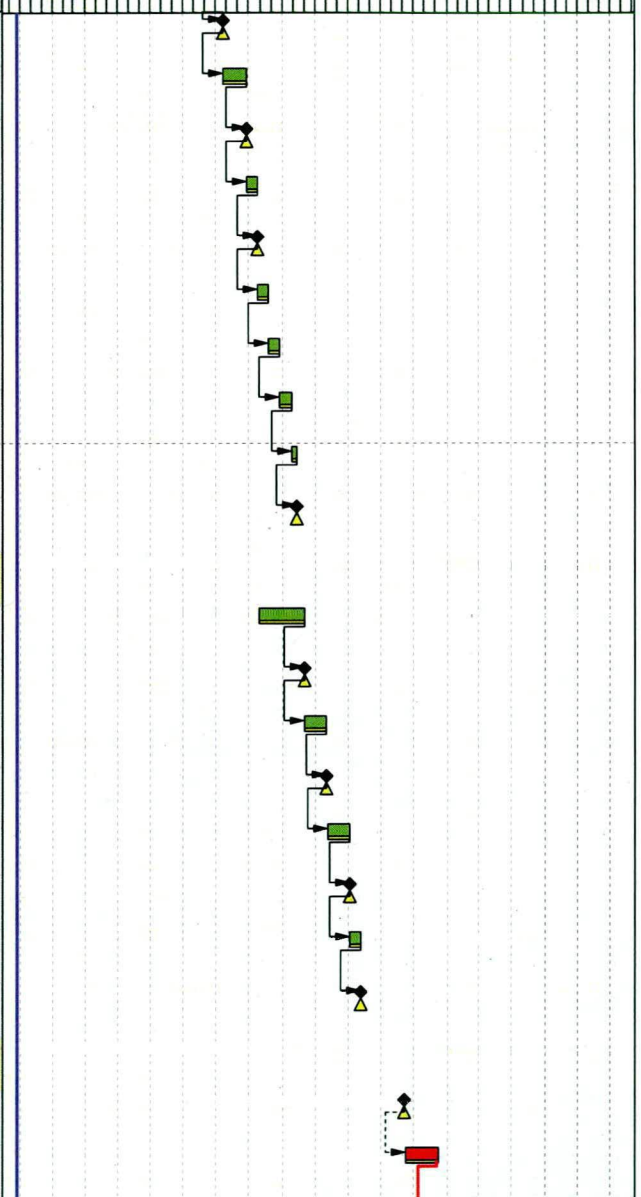
Activity Name	OD	Start	Finish	Fiscal Year							
				FY2019	FY2020	FY2021	FY2022	FY2023			
Project: D-Area Schedule D-Area Operable Unit Implementation Schedule				848	Feb-15-19	May-31-23					
1. Focused Feasibility Study Letter				193	Feb-15-19	Aug-26-19					
SRS - Develop Focused Feasibility Study Letter	67	Feb-15-19*	Apr-22-19								
SRS - Submit Focused Feasibility Study Letter	0		Apr-22-19								
SVT - EPA/SCDHEC Review Focused Feasibility Study Letter	46	Apr-23-19	Jun-07-19								
EPA/SCDHEC Submit Comments on Focused Feasibility Study Letter	0		Jun-07-19								
SRS - Incorporate EPA/SCDHEC Comments on Focused Feasibility Study Letter	46	Jun-10-19	Jul-25-19								
SRS - Submit Revised Focused Feasibility Study Letter	0		Jul-25-19								
SVT - EPA/SCDHEC Final Review and Approval Revised Focused Feasibility Study Letter	32	Jul-26-19	Aug-26-19								
EPA/SCDHEC Submit Approval of Revised Focused Feasibility Study Letter	0		Aug-26-19								
2. Early Action Statement of Basis/Proposed Plan (EA SB/PP)				146	Sep-26-19	Feb-18-20					
SRS - Incorporate EPA/SCDHEC Comments on Rev. 0 EA SB/PP	30	Sep-26-19*	Oct-25-19								
SRS - Submit Rev. 1 EA SB/PP	0		Oct-25-19								
SVT - EPA/SCDHEC Final Review and Approval Rev. 1 EA SB/PP	31	Oct-28-19	Nov-27-19								
EPA/SCDHEC Submit Approval of Rev. 1 EA SB/PP	0		Nov-27-19								
Prepare Public Notice of EA SB/PP Public Comment Period	13	Dec-02-19	Dec-14-19								
Public Comment Period	46	Dec-17-19	Jan-31-20								
Develop Responsiveness Summary	16	Feb-03-20	Feb-18-20								
3. Second Early Action Record of Decision (EA ROD)				180	Dec-17-19	Nov-10-20					
SRS - Develop Rev. 0 Second EA ROD	32	Dec-17-19*	Feb-18-20								
SRS - Submit Rev. 0 Second EA ROD	0		Feb-18-20								
SVT - EPA/SCDHEC Review Second EA ROD Rev 0	62	Feb-19-20	Apr-20-20								



	Actual Level of Effort		Milestone		Project Baseline LOE
	Actual Work		Remaining Work		Baseline Milestone
	Critical Actuals		% Complete		
	Critical Remaining Work		Project Baseline Bar		

D-Area Operable Unit Implementation Schedule

Activity Name	OD	Start	Finish	Fiscal Year				
				FY2019	FY2020	FY2021	FY2022	FY2023
EPA/SCDHEC Submit Comments on Rev. 0 Second EA ROD	0		Apr-20-20					
SRS - Incorporate EPA/SCDHEC Comments on the Rev. 0 Second EA ROD	63	Apr-21-20	Jun-22-20					
SRS - Submit Rev. 1 Second EA ROD	0		Jun-22-20					
SVT - EPA/SCDHEC Submit Approval of Rev. 1 Second EA ROD	31	Jun-23-20	Jul-23-20					
EPA/SCDHEC Submit Approval of Rev. 1 Second EA ROD	0		Jul-23-20					
SVT - DOE Obtain Signature on Second EA ROD	32	Jul-24-20	Aug-24-20					
SVT - EPA Obtain Signature on Second EA ROD	31	Aug-25-20	Sep-24-20					
SVT - SCDHEC Obtain Signature on Second EA ROD	32	Sep-25-20	Oct-26-20					
SRS - Prepare Public Notice for Issuance of Second EA ROD	15	Oct-27-20	Nov-10-20					
Issue Second EA ROD	0		Nov-10-20					
4. D-Area Land Use Control Implementation Plan (LUCIP)	152	Jul-30-20	May-06-21					
SRS - Develop Rev. 0 Second LUCIP	67	Jul-30-20*	Nov-30-20					
SRS - SRS Submit Rev. 0 Second LUCIP	0		Nov-30-20					
SVT - EPA/SCDHEC Review Rev. 0 Second LUCIP	63	Dec-01-20	Feb-01-21					
EPA/SCDHEC Submit Comments on Rev. 0 Second LUCIP	0		Feb-01-21					
SRS - Incorporate EPA/SCDHEC Comments on the Rev. 0 Second LUCIP	63	Feb-02-21	Apr-05-21					
SRS - Submit Rev. 1 Second LUCIP	0		Apr-05-21					
SVT - EPA/SCDHEC Final Review and Approval of Rev. 1 Second LUCIP	31	Apr-06-21	May-06-21					
EPA/SCDHEC Submit Approval of Rev. 1 Second LUCIP	0		May-06-21					
5. Remedial Action Start	97	Sep-03-21	Dec-08-21					
D-Area OU Remedial Action Start	0		Sep-03-21*					
Implement Remedial Action	93	Sep-07-21*	Dec-08-21					



- Remaining Level of Effort
- Actual Level of Effort
- Actual Work
- Critical Actuals
- Critical Remaining Work
- Actual Work Crit
- Milestone
- Remaining Work
- % Complete
- Project Baseline LOE
- Baseline Milestone
- Project Baseline Bar

