



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

MAY -3 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: Savannah River Site Federal Facility Agreement Minor Modification for Appendix L, Statements of Dispute Resolution, for the Milestone Changes for the D-Area Groundwater Operable Unit Removal Action to a Treatability Study

The U. S. Department of Energy (DOE) is submitting the subject Federal Facility Agreement Minor Modification based on discussions and agreements among the U. S. Department of Energy (DOE), South Carolina Department of Health and Environmental Control (SCDHEC), and U.S. Environmental Protection Agency (EPA). The purpose of the modification is to update the *Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestone* to replace the current non-time critical removal action (i.e., injection wells, canal treatment with CaCO_3) milestones associated with the D-Area Groundwater Operable Unit to milestones associated with a treatability study.

Upon receipt of the three Party signed FFA modification, the removal action milestone dates will be removed and the Treatability Study milestone dates will be incorporated into the FFA Appendices D and E, as appropriate.

Any future changes to the milestone dates for the D-Area Groundwater Treatability Study or for the non-time critical removal action for the D-Area Coal Storage Area (484-17D) soil neutralization will be effected in accordance with Section XXXI, "Extensions," of the FFA, without requiring further modification of this Suspension Agreement or Appendix L of the FFA.

The original FFA Modification Form has been signed by DOE and is being submitted to the SCDHEC for signature. Once signed by SCDHEC, the original FFA Modification Form should be forwarded to the EPA for signature and then returned to the DOE for incorporation into the FFA.

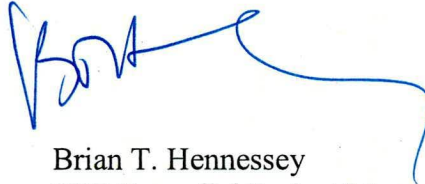
Ms. Susan Fulmer
Mr. Jon Richards

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The effort and time that the SCDHEC and EPA have given on the subject modification 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-18-149

Enclosure:

Savannah River Site Federal Facility Agreement Modification to Appendix L, "Statements of Dispute Resolution"

cc w/o encl:


G. K. Taylor, SCDHEC - Columbia
D. Scaturo, SCDHEC - Columbia
S. French, SCDHEC - Columbia
M. D. Wilson, SCDHEC - Columbia
G. N. O'Quinn, SCDHEC - Aiken Environmental Affairs Office
R. H. Pope, EPA - Atlanta

cc w/encl:

D. Lloyd, EPA - Atlanta
M. McRae, Tech Law, Inc.

Savannah River Site Federal Facility Agreement Modification

This form may be used for any modification not declared "major" under the terms of Section XLIII. of the Federal Facility Agreement.

Modification Requested By B. T. Hennessey	Requester Organization USDOE	Date 05/02/2018
Section To Be Modified Appendix L, "Statements of Dispute Resolution"		
Reason for Modification Add a "2018 Update to the Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones" to change the D-Area Groundwater Operable Unit Removal Action to a Treatability Study.		
<p>Modification Requested Based on discussions and agreements among the U. S. Department of Energy, South Carolina Department of Health and Environmental Control, and U. S. Environmental Protection Agency personnel, the "2018 Update to the Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones" will replace the current non-time critical removal action (i.e., injection wells, canal treatment with CaCO₃) milestones associated with the D-Area Groundwater Operable Unit to milestones associated with a treatability study. The current removal action milestones and proposed Treatability Study milestones are listed below.</p> <p><u>Current Removal Action Milestones</u></p> <p>D-Area Groundwater Operable Unit (NBN) Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis Submittal - July 31, 2018</p> <p>D-Area Groundwater Operable Unit (NBN) Action Memorandum Submittal - January 31, 2019</p> <p>D-Area Groundwater Operable Unit (NBN) Removal Action Start - January 31, 2020</p> <p><u>Treatability Study Milestones</u></p> <p>D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Work Plan Submittal - July 31, 2018</p> <p>D-Area Groundwater Operable Unit (NBN) Treatability Study Field Start - January 31, 2020</p> <p>D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Data Report Submittal - January 31, 2021</p> <p>Upon receipt of the three Party signed FFA modification, the removal action milestone dates will be removed and the Treatability Study milestone dates will be incorporated into the FFA Appendices D and E, as appropriate.</p> <p>Any future changes to the milestone dates for the D-Area Groundwater Treatability Study or for the non-time critical removal action for the D-Area Coal Storage Area (484-17D) soil neutralization will be effected in accordance with Section XXXI, "Extensions," of the FFA, without requiring further modification of this Suspension Agreement or Appendix L of the FFA.</p>		
DOE Approval (Signature) 	Date 5/2/2018	
SCDHEC Approval (Signature)	Date	
EPA-IV Approval (Signature)	Date	

**2018 Update to the
Suspension Agreement Federal Facility (FFA)
High-Level Waste (HLW) Tank Milestones (signed 11/2017)**

Based on discussions and agreements among the U. S. Department of Energy, South Carolina Department of Health and Environmental Control, and U. S. Environmental Protection Agency personnel, the current non-time critical removal action (i.e., injection wells, canal treatment with CaCO₃) milestones associated with the D-Area Groundwater Operable Unit will be replaced by milestones associated with a treatability study. The current removal action milestones and proposed Treatability Study milestones are listed below.

Current Removal Action Milestones

- D-Area Groundwater Operable Unit (NBN) Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis Submittal - July 31, 2018
- D-Area Groundwater Operable Unit (NBN) Action Memorandum Submittal - January 31, 2019
- D-Area Groundwater Operable Unit (NBN) Removal Action Start - January 31, 2020

Proposed Treatability Study Milestones

- D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Work Plan Submittal - July 31, 2018
- D-Area Groundwater Operable Unit (NBN) Treatability Study Field Start - January 31, 2020
- D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Data Report Submittal - January 31, 2021

Upon receipt of the three Party signed Federal Facility Agreement (FFA) modification, the removal action milestone dates will be removed and the Treatability Study milestone dates will be incorporated into the FFA Appendices D and E, as appropriate.

Any future changes to the milestone dates for the D-Area Groundwater Treatability Study or for the non-time critical removal action for the D-Area Coal Storage Area (484-17D) soil neutralization will be effected in accordance with Section XXXI, "Extensions," of the FFA, without requiring further modification of this Suspension Agreement or Appendix L of the FFA.