



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

NOV -4 2020

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:** Approval of the U. S. Environmental Protection Agency's 120-Day Extension Request for Submittal of Comments on the Lower Three Runs (LTR) Integrator Operable Unit (IOU) Proposed Plan (SRNS-RP-2019-00058, Revision 1 Redline, September 2020) and Extension Request for the Submittal of the LTR IOU Revision 0 Record of Decision and Subsequent Milestones, SEMS Number: 35

In accordance with the terms of Section XXXI of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is approving the U.S. Environmental Protection Agency's (EPA) 120-day extension request for submittal of comments on the Lower Three Runs (LTR) Integrator Operable Unit (IOU) Proposed Plan (PP) (SRNS-RP-2019-00058, Revision 1 Redline, September 2020) (SRNS-OS-2020-00396, dated 10/22/2020). In addition, the DOE is requesting a 120-day extension for submittal of the LTR IOU Revision 0 Record of Decision (ROD) and subsequent milestones. The new dates listed in the enclosed implementation schedule were revised to take into account both the EPA's 30-day extension notification for submittal of their comments on the Revision 0 PP and the 120-days noted in this extension request.

Schedule That Is Sought to Be Changed and/or Extended

The LTR IOU Revision 0 ROD submittal scheduled for December 12, 2020 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the LTR IOU Revision 0 ROD submittal from December 12, 2020 to May 06, 2021.

Cause of The Extension

The extension is being sought under the terms of the FFA Section XXXI.B.6: "Any other event or series of events, including but not limited to new technical information or technological barriers mutually agreed to by the Parties as constituting good cause."

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Additional time is required for the LTR IOU remedial decision process due to multiple delays incurred as a result of a separate dispute at Oak Ridge associated with identifying water quality standards as an applicable or relevant and appropriate requirement. Comment resolution and approval of the LTR PP is required prior to submittal of the LTR IOU Revision 0 ROD.

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 ROD submittal. Those milestones, along with their current and proposed dates, are listed below.

Milestone	Current Date	Proposed Date <sup>(1)</sup>
Revision 0 ROD Submittal	December 12, 2020	May 06, 2021
Issue ROD	August 21, 2021	January 24, 2022
Revision 0 Remedial Action Implementation Plan Submittal	October 31, 2021	April 01, 2022
Revision 0 Land Use Control Implementation Plan Submittal	October 31, 2021	April 01, 2022
Remedial Action Start	November 18, 2022	April 24, 2023
Revision 0 Post-Construction Report/Remedial Action Completion Report Submittal	August 20, 2024	January 21, 2025

<sup>(1)</sup> The proposed dates were updated to take into account both the EPA's 30-day extension notification for submittal of their comments on the Revision 0 PP (SRNS-OS-2020-00396, dated 10/22/2020) and the 120-days noted in this request.

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 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**  
Digitally signed by Brian T. Hennessey  
Date: 2020.11.03 09:12:15 -05'00'

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

IACD-21-104

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Enclosure:  
Lower Three Runs IOU Implementation Schedule

cc w/o encl:

J. Blalock, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
T. R. Fuss, SCDHEC – Aiken Environmental Affairs Office  
G. O'Quinn, SCDHEC–Aiken Environmental Affairs Office  
B. Cameron, SCDHEC–Aiken Environmental Affairs Office

cc w/encl:

R. Pope, EPA-Atlanta  
M. McRae, TechLaw, Inc.

C	Activity ID	Activity Name	Original Duration	Start	Finish	2021		2022				2023				2024				2025				2026			
						Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
<b>3- PROPOSED PLAN</b>						<b>228d Sep-21-2020 May-06-2021</b>																					
EQT0111140	EPA/SCDHEC Final Review and Approval PP	152d	Sep-21-2020*	Feb-19-2021																							
EQT0111170	Notification of Public Comment	12d	Feb-22-2021	Mar-05-2021																							
EQT0111185	Public Comment Period	45d	Mar-08-2021	Apr-21-2021																							
EQT0111186	Responsiveness Summary and Approval	15d	Apr-22-2021	May-06-2021																							
<b>4- ROD</b>						<b>242d Feb-04-2021 Jan-24-2022</b>																					
EQT0111110	Develop ROD LTR	64d	Feb-04-2021	May-06-2021																							
EQT0111200	Submit Rev. 0 ROD	0d		May-06-2021																							
EQT0111215	EPA/SCDHEC Review of Rev. 0 ROD	61d	May-07-2021	Jul-06-2021																							
EQT0111245	SRS Incorporates EPA/SCDHEC Comments ROD	63d	Jul-07-2021	Sep-07-2021																							
EQT0111275	SRS Submittal of Rev. 1 ROD	0d		Sep-07-2021																							
EQT0111290	EPA/SCDHEC Final Review and Approval of ROD	30d	Sep-08-2021	Oct-07-2021																							
EQT0111305	Receipt of ROD Approval	0d		Oct-07-2021																							
EQT0101371	DOE Obtain Signature on ROD	32d	Oct-08-2021	Nov-08-2021																							
EQT0101373	EPA Obtain Signature on ROD	30d	Nov-09-2021	Dec-08-2021																							
EQT0101375	SCDHEC Obtain Signature on ROD	30d	Dec-09-2021	Jan-07-2022																							
EQT0101377	Prepare for Public Notice	15d	Jan-10-2022	Jan-24-2022																							
EQT0101379	Issue ROD	0d		Jan-24-2022																							
<b>5- RAIP</b>						<b>315d Jul-07-2021 Oct-06-2022</b>																					
EQT500110	Develop RAIP	185d	Jul-07-2021	Apr-01-2022																							
EQT500100	Submit Rev. 0 RAIP	0d		Apr-01-2022																							
EQT500120	EPA/SCDHEC Review of Rev. 0 RAIP	93d	Apr-04-2022	Jul-05-2022																							
EQT500130	SRS Incorporates EPA/SCDHEC Comments RAIP	63d	Jul-06-2022	Sep-06-2022																							
EQT500140	SRS Submittal Rev. 1 RAIP	0d		Sep-06-2022																							
EQT500280	EPA/SCDHEC Final Review and Approval RAIP	30d	Sep-07-2022	Oct-06-2022																							

**Savannah River Nuclear Solutions**  
*Lower Three Runs*  
 IOU

*LTR IOU*  
 Implementation Schedule Layout

