



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

MAR - 4 2024

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  
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 Submittal of the Revision 0 Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) and Subsequent Milestones, 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 Revision 0 Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation (RFI/RI) Report with Baseline Risk Assessment (BRA) for the D-Area Groundwater (DAG) Operable Unit (OU) (D-Area Upgradient Sources) and subsequent milestones.

Schedule That Is Sought to Be Changed and/or Extended:

The Revision 0 RFI/RI Report with BRA for the DAG OU (D-Area Upgradient Sources) submittal scheduled for December 10, 2024 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the Revision 0 submittal from December 10, 2024, to December 10, 2026.

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."

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During the November 30, 2023, DAG OU Post-Characterization Scoping Meeting, uncertainties associated with contaminant migration risk to groundwater sourced from per- and polyfluoroalkyl substances (PFAS) contamination in surface and/or vadose zone soils were discussed in detail. As agreed, these uncertainties will be evaluated by performing characterization activities (i.e., sampling/analysis of soil borings) in suspected PFAS source areas. These characterization activities will be further defined in a Revision 0 DAG OU Work Plan Addendum planned for submittal on April 4, 2024. As a result of a follow-up meeting held on February 20, 2024, the Core Team agreed to revise the DAG OU implementation schedule (see enclosure) to conduct this additional PFAS source area characterization and to allow for the continual operation and evaluation of the DAG OU Treatability Study associated with the coal storage area.

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 Revision 0 RFI/RI Report with BRA and CMS/FS submittal. The milestones, along with their current and proposed dates, are listed below.

<b>Milestone</b>	<b>Current Date</b>	<b>Proposed Date</b>
Revision 0 RFI/RI Report with BRA	December 10, 2024	December 10, 2026
Revision 0 CMS/FS Submittal	March 10, 2026	March 9, 2028
Revision 0 Statement of Basis/Proposed Plan	November 9, 2026	November 9, 2028
Revision 0 Record of Decision (ROD)	July 15, 2027	July 17, 2029
Issue ROD	March 28, 2028	March 29, 2030
Remedial Action Start	June 21, 2029	June 22, 2031

Please review the information contained in this extension request and provide your response within fourteen (14) business days from receipt. The FFA Appendices D and E, as needed, will be updated to reflect the revised dates, including the submittal of the Revision 0 DAG OU Work Plan Addendum. The effort and time that the U. S. Environmental Protection Agency 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) 952-7805, or the DOE Operable Unit Project Manager, Karen Adams, at (803) 952-7871.

Sincerely,

**AVERY HAMMETT**  
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HAMMETT  
Date: 2024.02.29 12:50:39 -05'00'

Avery G. Hammett  
FFA Project Manager, DOE-Savannah River  
Remediation and Deactivation & Decommissioning Division

RDDD-24-124

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Ms. Susan Fulmer  
Mr. Jon Richards

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Enclosure:  
D-Area Groundwater Operable Unit Implementation Schedule

cc:

J. Blalock, SCDHEC-Columbia  
S. French, SCDHEC-Columbia  
M. Reece, SCDHEC-Columbia  
G. K. Taylor, SCDHEC-Columbia  
G. Stewart, SCDHEC-Columbia  
T. R. Fuss, SCDHEC-Aiken Environmental Affairs Office  
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office  
B. A. Cameron, SCDHEC-Aiken Environmental Affairs Office  
K. L. Beatty, SCDHEC-Aiken Environmental Affairs Office  
H. L. Herlong, SCDHEC-Aiken Environmental Affairs Office

#	Activity ID	Activity Name	Original Duration	Start	Finish	2023	FY2024	FY2025	FY2026	FY2027	FY2028	FY2029	FY2030	FY2031
1	<b>1- Workplan Addendum</b>		100d	5-Feb-2024	2-Aug-2024									
2	WRKPLNA10	Develop D-Area Groundwater OU Revision 0 SAP / RFI / RI Work Plan Addendum	34d	5-Feb-2024*	4-Apr-2024									
3	WRKPLNA20	D-Area Groundwater OU Revision 0 SAP / RFI / RI Work Plan Addendum Submittal	0d		4-Apr-2024									
4	WRKPLNA30	EPA/SCDHEC Review Revision 0 SAP / RFI / RI Work Plan Addendum	60d	5-Apr-2024	3-Jun-2024									
5	WRKPLNA40	SRS Incorporate EPA/SCDHEC Comments	30d	4-Jun-2024	3-Jul-2024									
6	WRKPLNA50	SRS Submit Rev. 1 SAP / RFI / RI Work Plan Addendum	0d		3-Jul-2024									
7	WRKPLNA60	EPA/SCDHEC Final Review & Approval of Rev. 1 SAP / RFI / RI Work Plan Addendum	30d	4-Jul-2024	2-Aug-2024									
8	<b>3 - RFI / RI / BRA Report</b>		215d	7-May-2026	8-Jun-2027									
9	DAGWOU07190	Develop D-Area Groundwater OU Revision 0 RFI/RI / BRA	120d	7-May-2026*	10-Dec-2026									
10	DAGWOU07200	D-Area Groundwater OU Revision 0 RFI / RI / BRA Submittal	0d		10-Dec-2026									
11	DAGWOU07210	EPA/SCDHEC Review Revision 0 RFI / RI / BRA	90d	11-Dec-2026	10-Mar-2027									
12	DAGWOU07220	SRS Incorporate EPA/SCDHEC Comments	60d	11-Mar-2027	9-May-2027									
13	DAGWOU07230	SRS Submit Rev. 1 RFI / RI / BRA	0d		9-May-2027									
14	DAGWOU07240	EPA/SCDHEC Final Review & Approval of Rev. 1 RFI / RI / BRA	30d	10-May-2027	8-Jun-2027									
15	<b>4- CMS / FS Report</b>		220d	2-Aug-2027	7-Sep-2028									
16	DAGWOU07260	Develop D-Area Groundwater OU Revision 0 CMS/FS	120d	2-Aug-2027*	9-Mar-2028									
17	DAGWOU07280	D-Area Groundwater OU Revision 0 CMS/FS Submittal	0d		9-Mar-2028									
18	DAGWOU07290	EPA/SCDHEC Review Revision 0 CMS/FS	90d	10-Mar-2028	7-Jun-2028									
19	DAGWOU07300	SRS Incorporate EPA/SCDHEC Comments	60d	8-Jun-2028	6-Aug-2028									
20	DAGWOU07310	SRS Submit Rev. 1 CMS/FS	0d		6-Aug-2028									
21	DAGWOU07320	EPA/SCDHEC Final Review & Approval of Rev. 1 CMS/FS	30d	9-Aug-2028	7-Sep-2028									
22	<b>5 - Statement of Basis/Proposed Plan (SB/PP)</b>		248d	10-Apr-2028	10-Jul-2029									
23	DAGWOU07340	Develop D-Area Groundwater OU Revision 0 SB/PP	120d	10-Apr-2028*	9-Nov-2028									

Remaining Level of Effort    
  Remaining Work  
 Actual Level of Effort    
  % Complete  
 Actual Work    
  Actual Work Crit  
 Milestone    
  Baseline Milestone  
 Summary

D - Area Groundwater OU Implementation Schedule 1 24 2024

