



Department of Energy
Savannah River Operations Office
P.O. Box A
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OCT 13 2022

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: Third Extension Request for the Submittal of the Early Action Remedial Investigation Work Plan (Revision 0) and Subsequent Milestones in Support of the F-Area Operable Unit, SEMS Number: 88

In accordance with the terms of Section XXXI of the Federal Facility Agreement (FFA), the U. S. Department of Energy (DOE) is requesting a multiple year extension for submittal of the Early Action (EA) Remedial Investigation Work Plan (RI WP) (Revision 0) and subsequent milestones in support of the F-Area Operable Unit (FAOU). The early action is specific to fourteen (14) facility remnants listed in the FFA, Appendix C.4.

Schedule That Is Sought to Be Changed and/or Extended

The Revision 0 FAOU EA RI WP submittal scheduled for January 28, 2023 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the Revision 0 FAOU EA RI WP submittal from January 28, 2023 as necessary to support a remedial investigation field start of September, 2035. The submittal date for the WP will be established when an implementation schedule is approved for the FAOU final action.

Cause of The Extension

This 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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Since submittal and regulatory approval of the second extension request (IACD-22-108, dated November 16, 2021), SRS has concluded that the timing for the early actions on the fourteen (14) F-Area facility remnants/slabs is not appropriate due to the logistical requirements of the Savannah River Plutonium Processing Facility mission located within FAOU. However, the risk reduction afforded by completing the remedial investigation and assessment of the decommissioning remnants in the F-Area Early Action OU is not significant, and performing them as part of the F Area Operable Unit final action will be more practicable.

Please note: based on regulatory approval of the ash strategy (IACD-22-166, dated July 21, 2022) and associated comment responses (IACD-22-180, dated September 15, 2022), the DOE will add the milestones established for the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), D-Area Ash Basin Wetlands (NBN), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), L-Area Ash Basin (188-L), and Wetland Area at Dunbarton Bay (NBN) to the FFA Appendices D and E, as appropriate.

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 FAOU EA RI WP submittal. The milestones, along with their current and proposed dates, are listed as follows:

Milestone¹	Current Date	Proposed Date²
Revision 0 RI Work Plan	January 28, 2023	TBD
RI Field Start	January 28, 2024	September 2035
Revision 0 RI/Baseline Risk Assessment / Feasibility Study	February 22, 2025	TBD
Revision 0 Proposed Plan	December 24, 2025	TBD
Revision 0 Record of Decision (ROD)	August 12, 2026	TBD
Issue ROD	April 29, 2027	September 2039
Revision 0 Remedial Action Implementation Plan (RAIP)	January 28, 2027	TBD
Revision 0 Land Use Control Implementation Plan (LUCIP)	January 28, 2027	TBD
EA Remedial Action Start	July 28, 2028	December 2040

¹ The building slabs are not Solid Waste Management Units; therefore, the milestones reflect CERCLA only activities.

² TBD – These dates are to be determined. They will be established when an implementation schedule for the FAOU is developed by SRS and approved by the regulators.

So that this extension can be reflected in the upcoming Appendix E, *Fiscal Year 2023 Long Term Projections*, 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 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.

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Questions from you or your staff may be directed to me at (803) 952-8365.

Sincerely,

**Brian T.
Hennessey**

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Hennessey
Date: 2022.10.13 15:57:58 -04'00'

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

IACD-23-102

cc:

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Administrative Record File, 730-4B