



ARF-022237

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

JUN 27 2019

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:** Third Extension Request for the Submittal of the Proposed Plan (SRNS-RP-2019-00058, Revision 0) and Subsequent Milestones for the Lower Three Runs Integrator Operable Unit, 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 requesting an extension for submittal of the Lower Three Runs (LTR) Integrator Operable Unit (IOU) Proposed Plan (PP) (SRNS-RP-2019-00058, Revision 0) and subsequent milestones.

Schedule That Is Sought to Be Changed and/or Extended

The LTR IOU Revision 0 PP submittal scheduled for July 29, 2019 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the LTR IOU Revision 0 PP submittal for ninety (90) days from July 29, 2019 to October 27, 2019.

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"

Additional time is required to allow for the resolution of a current dispute at Oak Ridge associated with identifying water quality standards as an applicable or relevant and appropriate requirement (ARAR). The decision could impact the determination of ARARs for one of the LTR IOU remedial alternatives.

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

<b>Milestone</b>	<b>Current Date</b>	<b>Proposed Date</b>
Revision 0 Proposed Plan	July 29, 2019	October 27, 2019
Revision 0 Record of Decision (ROD)	March 16, 2020	June 15, 2020
Issue ROD	November 23, 2020	February 22, 2021
Revision 0 Remedial Action Implementation Plan	February 3, 2021	May 4, 2021
Revision 0 Land Use Control Implementation Plan	February 3, 2021	May 4, 2021
Remedial Action Start	November 28, 2021	May 22, 2022
Revision 0 Post-Construction Report/Remedial Action Completion Report	June 15, 2023	February 22, 2024

Please review the information contained in this extension request and provide your response within fourteen (14) business days from 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.

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-19-167

cc:

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