



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

AUG 27 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: Extension Request for the Submittal of the Resource Conservation and Recovery Act (RCRA) Facility Investigation / Remedial Investigation (RFI/RI) Work Plan 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 information indicated in the subject line above.

Schedule That Is Sought to Be Changed and/or Extended

The Resource Conservation and Recovery Act (RCRA) Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater (DAG) Operable Unit (D-Area Upgradient Sources) and all subsequent milestones are sought for extension.

Length of Extension Requested

The DOE proposes to extend the submittal of the RFI/RI Work Plan for the DAG Operable Unit (D-Area Upgradient Sources) and all subsequent milestones as shown in Table 1. (Note: The RFI/RI Report with Baseline Risk Assessment (BRA) for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) milestone is currently October 8, 2020.)

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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A Core Team [DOE, U.S. Environmental Protection Agency (EPA) and South Carolina Department of Health and Environmental Control (SCDHEC)] conference call was held on August 12, 2020 to discuss the current implementation schedule along with a proposed revised implementation schedule (Enclosure 1). As a result of the meeting, the Core Team agreed that changes to the schedule are necessary for two reasons:

- 1) COVID-19 pandemic disrupted the ability to plan, schedule, and scope the RFI/RI Work Plan (WP) along with the ongoing field work that supports the development of the document. Specifically, an important 2-day information meeting that included a field walkdown and face-to-face discussions and a comprehensive historical information review was cancelled in early calendar year 2020 due to the pandemic. This meeting had been requested by the Core Team as a prelude to a subsequent WP Scoping Meeting. The delay in scoping the WP impacts the ability to plan a properly focused remedial investigation and to produce a quality RFI/RI Report with BRA that will identify problems warranting action and support remedial assessment.
- 2) The complexities of the three discrete groundwater plumes within DAG create essentially three distinct areas of investigation that will result in a WP requiring a greater than usual degree of integration and planning to achieve the desired understanding of groundwater conditions as efficiently as possible. To properly consider the ongoing treatability study around the coal yard, the removal action within the coal yard, data from recently installed wells, and the investigations into the potential for polyfluoroalkyl substances (PFAS) due to past firefighting training in this area, additional time is needed to scope, develop, and execute an effective WP.

Table 1

Milestone	Current Date	Proposed Date*
Submit RFI/RI Work Plan	Not Applicable**	June 14, 2021
Submit RFI/RI Report with BRA	October 8, 2020	December 10, 2024
Submit Revision 0 Corrective Measures Study / Feasibility Study	July 20, 2021	March 10, 2026
Submit Revision 0 Statement of Basis Proposed Plan	March 21, 2022	November 10, 2026
Submit Revision 0 Record of Decision (ROD)	November 7, 2022	July 15, 2027
Issue ROD	June 30, 2023	March 28, 2028
Remedial Action Start Date	September 30, 2024	June 21, 2029

*Proposed Dates are based on the D-Area Groundwater OU Implementation Schedule (Enclosure 2).

**B. Hennessey (DOE) to S. Fulmer (SCDHEC) and J. Richards (EPA), *Second Extension Request for the Submittal of the RCRA Facility Investigation / Remedial Investigation (RFI/RI) Work Plan for the D-Area Groundwater Operable Unit (D-Area Upgradient Sources) (SRNS-RP-2019-00394, Revision 0) SEMS Number: 63 (IACD-19-180, Dated 9/5/2019)*

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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 all subsequent milestones for this operable unit as shown in Table 1. These revised dates will be reflected as part of the annual revisions to the FFA Appendices D and E.

Please review the information contained in this extension request and provide your response within fifteen (15) business days from receipt of this letter. The effort and time that the EPA and the SCDHEC 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, or the DOE Federal Project Director, Ms. Karen Adams, at (803) 952-7871.

Sincerely,

BRIAN HENNESSEY

Digitally signed by BRIAN
HENNESSEY

Date: 2020.08.26 08:05:16 -04'00'

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

IACD-20-178

Enclosures:

1. Handout Slide at August 12, 2020 Conference Call - DAG Schedule (Current/Proposed) (Revised as a Result of the August 12, 2020 Meeting)
2. D-Area Groundwater OU Implementation Schedule

cc w/o encl:

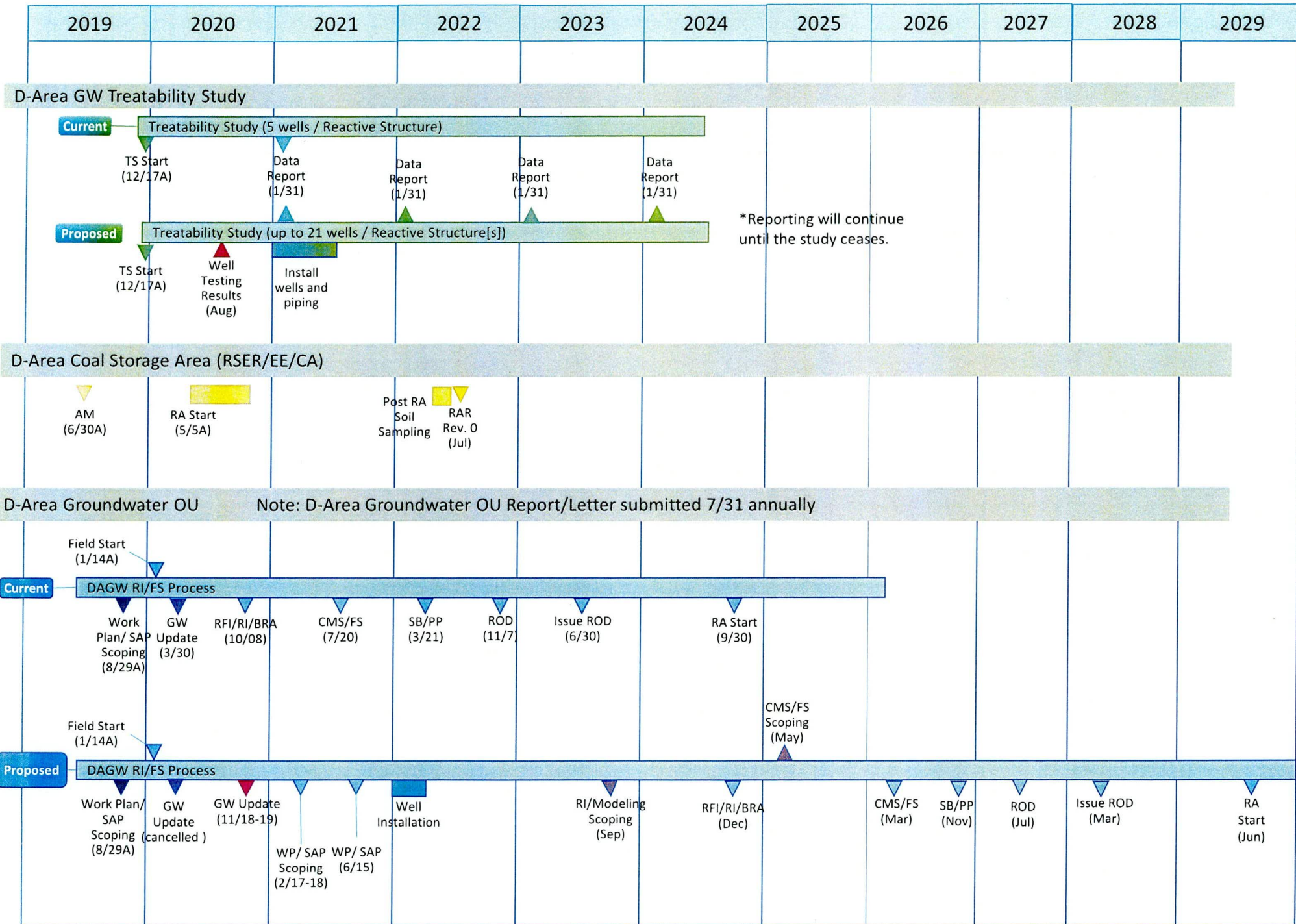
J. Blalock, SCDHEC-Columbia
S. French, SCDHEC-Columbia
M. Reece, SCDHEC-Columbia
G. K. Taylor, SCDHEC-Columbia
T. Fuss, SCDHEC-Aiken Environmental Affairs Office
G. N. O'Quinn, SCDHEC - Aiken Environmental Affairs Office
B. Cameron, SCDHEC-Aiken Environmental Affairs Office
R. H. Pope, EPA-Atlanta

cc w/ encl:

D. Lloyd, EPA-Atlanta
M. McRae, TechLaw, Inc

*Dates are CY

DAGW Schedules (Current/Proposed)



#	Activity ID	Activity Name	Original Duration	Start	Finish	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	FY2027	FY2028	FY2029
1- Workplan Development														
1			245d	17-Nov-2020	16-Feb-2022									
2	WRKPLND10	Develop D-Area Groundwater OU Revision 0 SAP / RFI / RI Work Plan	111d	17-Nov-2020*	14-Jun-2021									
3	WRKPLND20	D-Area Groundwater OU Revision 0 SAP / RFI / RI Work Plan Submittal	0d		14-Jun-2021									
4	WRKPLND30	EPA/SCDHEC Review Revision 0 SAP / RFI / RI Work Plan	123d	15-Jun-2021	15-Oct-2021									
5	WRKPLND40	SRS Incorporate EPA/SCDHEC Comments	92d	18-Oct-2021*	17-Jan-2022									
6	WRKPLND50	SRS Submit Rev. 1 SAP / RFI / RI Work Plan	0d		17-Jan-2022									
7	WRKPLND60	EPA/SCDHEC Final Review & Approval of Rev. 1 SAP / RFI / RI Work	30d	18-Jan-2022	16-Feb-2022									
3 - RFI / RI / BRA Report														
8			216d	07-May-2024	09-Jun-2025									
9	RFIRI200	Develop D-Area Groundwater OU Revision 0 RFI/RI / BRA	120d	07-May-2024*	10-Dec-2024									
10	RFIRI300	D-Area Groundwater OU Revision 0 RFI / RI / BRA Submittal	0d		10-Dec-2024									
11	RFIRI400	EPA/SCDHEC Review Revision 0 RFI / RI / BRA	90d	11-Dec-2024	10-Mar-2025									
12	RFIRI500	SRS Incorporate EPA/SCDHEC Comments	60d	11-Mar-2025	09-May-2025									
13	RFIRI600	SRS Submit Rev. 1 RFI / RI / BRA	0d		09-May-2025									
14	RFIRI700	EPA/SCDHEC Final Review & Approval of Rev. 1 RFI / RI / BRA	31d	10-May-2025	09-Jun-2025									
4- CMS / FS Report														
15			220d	30-Jul-2025	08-Sep-2026									
16	CMSFS100	Develop D-Area Groundwater OU Revision 0 CMS/FS	120d	30-Jul-2025*	10-Mar-2026									
17	CMSFS200	D-Area Groundwater OU Revision 0 CMS/FS Submittal	0d		10-Mar-2026									
18	CMSFS300	EPA/SCDHEC Review Revision 0 CMS/FS	90d	11-Mar-2026	08-Jun-2026									
19	CMSFS400	SRS Incorporate EPA/SCDHEC Comments	60d	09-Jun-2026	07-Aug-2026									
20	CMSFS500	SRS Submit Rev. 1 CMS/FS	0d		07-Aug-2026									
21	CMSFS600	EPA/SCDHEC Final Review & Approval of Rev. 1 CMS/FS	30d	10-Aug-2026	08-Sep-2026									
5 - Statement of Basis/Proposed Plan (SB/PP)														
22			252d	09-Apr-2026	15-Jul-2027									
23	SBPP100	Develop D-Area Groundwater OU Revision 0 SB/PP	120d	09-Apr-2026*	10-Nov-2026									
24	SBPP200	D-Area Groundwater OU Revision 0 SB/PP Submittal	0d		10-Nov-2026									
25	SBPP300	EPA/SCDHEC Review Revision 0 SB/PP	62d	11-Nov-2026	11-Jan-2027									

█ Remaining Level of Effort ◆ Milestone ▬ Summary
█ Actual Level of Effort █ Remaining Work
█ Actual Work █ % Complete
█ Actual Work Crit △ Baseline Milestone

D - Area Groundwater OU Implementation Schedule

#	Activity ID	Activity Name	Original Duration	Start	Finish	FY2021	FY2022	FY2023	FY2024	FY2025	FY2026	FY2027	FY2028	FY2029
26	SBPP400	SRS Incorporate EPA/SCDHEC Comments	60d	12-Jan-2027	12-Mar-2027									
27	SBPP500	SRS Submit Rev. 1 SB/PP	0d		12-Mar-2027									
28	SBPP600	EPA/SCDHEC Final Review & Approval of Rev. 1 SB/PP	30d	15-Mar-2027*	13-Apr-2027									
29	SBPP700	Notification of Public Comment Proposed Plan	14d	14-Apr-2027	27-Apr-2027									
30	SBPP800	Public Comment Period	48d	28-Apr-2027	14-Jun-2027									
31	SBPP900	Develop Responsiveness Summary	29d	17-Jun-2027	15-Jul-2027									
32	6- ROD		198d	31-Mar-2027	28-Mar-2028									
33	RODDARA10	Develop D-Area Groundwater OU Revision 0 ROD	60d	31-Mar-2027*	15-Jul-2027									
34	RODDARA20	D-Area Groundwater OU Revision 0 ROD Submittal	0d		15-Jul-2027									
35	RODDARA30	EPA/SCDHEC Review of ROD (Rev.0)	60d	16-Jul-2027	13-Sep-2027									
36	RODDARA40	SRS Incorporate EPA/SCDHEC Comments	60d	14-Sep-2027	12-Nov-2027									
37	RODDARA50	Submit ROD (Rev.1) to EPA/SCDHEC	0d		12-Nov-2027									
38	RODDARA60	EPA/SCDHEC Final Review/Approval	30d	15-Nov-2027*	14-Dec-2027									
39	RODDARA70	Approval of ROD	0d		14-Dec-2027									
40	RODDARA80	DOE Obtain Signature on ROD	30d	16-Dec-2027	14-Jan-2028									
41	RODDARA90	SCDHEC obtain Signature on ROD	30d	18-Jan-2028*	16-Feb-2028									
42	RODDARA100	EPA obtain Signature on ROD	30d	14-Feb-2028	14-Mar-2028									
43	RODDARA110	Prepare Public Notice	14d	15-Mar-2028	28-Mar-2028									
44	RODDARA120	Issue ROD	0d		28-Mar-2028									
45	7 - RA Start		0d	21-Jun-2029	21-Jun-2029									
46	RASTART20	D-Area Groundwater OU Remedial Action Start	0d		21-Jun-2029									

■ Remaining Level of Effort ◆ Milestone ▼ Summary
■ Actual Level of Effort ■ Remaining Work
■ Actual Work ■ % Complete
■ Actual Work Crit ▲ Baseline Milestone

D - Area Groundwater OU Implementation Schedule 8 17 2020