

Savannah River Site Federal Facility Agreement Modification

ENVIRONMENTAL COMPLIANCE &

MAY 14 2018

This form may be used for any modification not declared "major" under the terms of Section XLIII. of the Federal Facility Agreement.

Modification Requested By B. T. Hennessey	Requester Organization USDOE	Date 05/02/2018
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Section To Be Modified
Appendix L, "Statements of Dispute Resolution"

Reason for Modification
Add a "2018 Update to the Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones" to change the D-Area Groundwater Operable Unit Removal Action to a Treatability Study.

Modification Requested
Based on discussions and agreements among the U. S. Department of Energy, South Carolina Department of Health and Environmental Control, and U. S. Environmental Protection Agency personnel, the "2018 Update to the Suspension Agreement Federal Facility Agreement (FFA) High-Level Waste (HLW) Tank Milestones" will replace the current non-time critical removal action (i.e., injection wells, canal treatment with CaCO₃) milestones associated with the D-Area Groundwater Operable Unit to milestones associated with a treatability study. The current removal action milestones and proposed Treatability Study milestones are listed below.

Current Removal Action Milestones

D-Area Groundwater Operable Unit (NBN) Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis Submittal - July 31, 2018

D-Area Groundwater Operable Unit (NBN) Action Memorandum Submittal - January 31, 2019

D-Area Groundwater Operable Unit (NBN) Removal Action Start - January 31, 2020

Treatability Study Milestones




D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Work Plan Submittal - July 31, 2018

D-Area Groundwater Operable Unit (NBN) Treatability Study Field Start - January 31, 2020

D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Data Report Submittal - January 31, 2021

Upon receipt of the three Party signed FFA modification, the removal action milestone dates will be removed and the Treatability Study milestone dates will be incorporated into the FFA Appendices D and E, as appropriate.

Any future changes to the milestone dates for the D-Area Groundwater Treatability Study or for the non-time critical removal action for the D-Area Coal Storage Area (484-17D) soil neutralization will be effected in accordance with Section XXXI, "Extensions," of the FFA, without requiring further modification of this Suspension Agreement or Appendix L of the FFA.

DOE Approval (Signature) 	Date 5/2/2018
SCDHEC Approval (Signature) 	Date 5/8/2018
EPA-IV Approval (Signature) 	Date 5/10/2018

**2018 Update to the
Suspension Agreement Federal Facility (FFA)
High-Level Waste (HLW) Tank Milestones (signed 11/2017)**

Based on discussions and agreements among the U. S. Department of Energy, South Carolina Department of Health and Environmental Control, and U. S. Environmental Protection Agency personnel, the current non-time critical removal action (i.e., injection wells, canal treatment with CaCO₃) milestones associated with the D-Area Groundwater Operable Unit will be replaced by milestones associated with a treatability study. The current removal action milestones and proposed Treatability Study milestones are listed below.

Current Removal Action Milestones

- D-Area Groundwater Operable Unit (NBN) Revision 0 Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis Submittal - July 31, 2018
- D-Area Groundwater Operable Unit (NBN) Action Memorandum Submittal - January 31, 2019
- D-Area Groundwater Operable Unit (NBN) Removal Action Start - January 31, 2020

Proposed Treatability Study Milestones

- D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Work Plan Submittal - July 31, 2018
- D-Area Groundwater Operable Unit (NBN) Treatability Study Field Start - January 31, 2020
- D-Area Groundwater Operable Unit (NBN) Revision 0 Treatability Study Data Report Submittal - January 31, 2021

Upon receipt of the three Party signed Federal Facility Agreement (FFA) modification, the removal action milestone dates will be removed and the Treatability Study milestone dates will be incorporated into the FFA Appendices D and E, as appropriate.

Any future changes to the milestone dates for the D-Area Groundwater Treatability Study or for the non-time critical removal action for the D-Area Coal Storage Area (484-17D) soil neutralization will be effected in accordance with Section XXXI, "Extensions," of the FFA, without requiring further modification of this Suspension Agreement or Appendix L of the FFA.