



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

FEB 29 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 Resource Conservation and Recovery Act Facility Investigation/Remedial Investigation Report with Baseline Risk Assessment and Corrective Measures Study/Feasibility Study for the Early Construction and Operational Disposal Site L-3 (East of L Area) (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (U), (SRNS-RP-2023-01365, Revision 0) and Subsequent Milestones, SEMS Number: 91

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) and Corrective Measures Study/Feasibility Study (CMS/FS) for the Early Construction and Operational Disposal Site (ECODS) L-3 (East of L Area) (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (OU) and subsequent milestones.

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

The Revision 0 RFI/RI Report with BRA and CMS/FS for the ECODS (East of L Area) (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) OU submittal scheduled for March 22, 2024 and all subsequent milestones.

Length of Extension Requested

The DOE proposes to extend the Revision 0 submittal from March 22, 2024, to July 31, 2024.

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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.”

As discussed during the November 9, 2023, Post Characterization and Preliminary Data Analysis Scoping Meeting, the RFI/RI Work Plan characterization effort experienced unexpected delays in the finalization of the definitive-level data for the L-Area Rubble Pit (LRP) 131-1L and LRP 131-4L Subunits. These delays had a significant impact to the overall implementation schedule for the ECODS L-3, LRP 131-1L, and LRP 131-4L OU. A revised implementation schedule is enclosed for your use.

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.

Milestone	Current Date	Proposed Date
Revision 0 RFI/RI Report with BRA and CMS/FS	March 22, 2024	July 31, 2024
Revision 0 Statement of Basis/Proposed Plan	January 30, 2025	June 5, 2025
Revision 0 Record of Decision (ROD)	September 11, 2025	January 5, 2026
Issue ROD	May 24, 2026	September 24, 2026
Revision 0 Corrective Measures Implementation Plan/ Remedial Action Implementation Plan	April 6, 2026	July 22, 2026
Revision 0 Land Use Control Implementation Plan	April 6, 2026	July 22, 2026
Remedial Action Start	August 27, 2027	December 28, 2027

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.

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Ms. Susan Fulmer
Mr. Jon Richards

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Questions from you or your staff may be directed to me at (803) 952-8365, or the DOE Program Manager, Mr. Philip Prater, at (803) 952-9333.

Sincerely,

AVERY HAMMETT Digitally signed by AVERY
HAMMETT
Date: 2024.02.28 14:10:07 -05'00'

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

RDDD-24-125

Enclosure:

ECODS L-3, L-Area Rubble Pits (131-1L, 131-4L) OU Implementation Schedule

cc w/o encl:

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

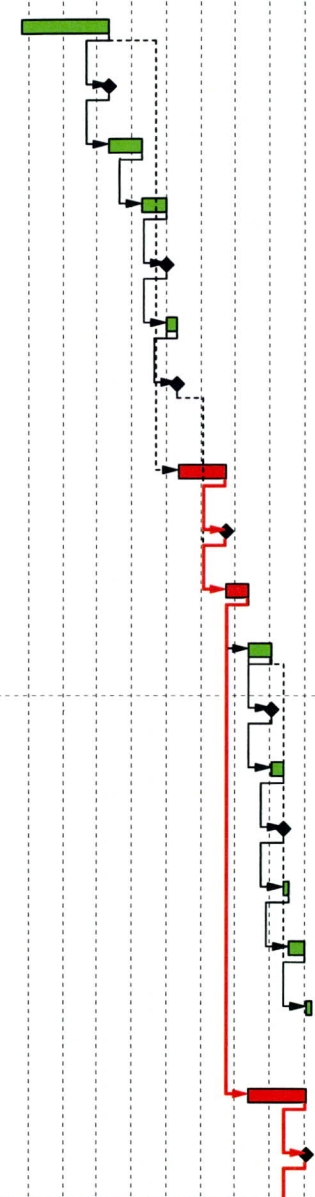
G. O'Quinn, SCDHEC-Aiken Environmental Affairs Office

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 Name	OD	Start	RDDD-24-125 Finish	ARE 024480						
				FY2022	FY2023	FY2024	FY2025	FY2026	FY2027	
Steel Creek	796d	14-Dec-2023	28-Dec-2027							
ECODS L-3, L-Area Rubble Pits (131-1L, 131-4L)	796d	14-Dec-2023	28-Dec-2027							
3-Combined RFI/RI/BRA/CMS/FS	414d	14-Dec-2023	30-Jan-2025							
SRS Prepare Combined Document	231d	14-Dec-2023	31-Jul-2024							
SRS Submit Combined Document (Rev.0) to EPA/SCDHEC	0d		31-Jul-2024							
EPA/SCDHEC Review of Combined Document (Rev.0)	90d	1-Aug-2024	29-Oct-2024							
SRS Incorporate EPA/SCDHEC Comments	62d	30-Oct-2024	30-Dec-2024							
Submit Combined Document (Rev.1) to EPA/SCDHEC	0d		30-Dec-2024							
EPA/SCDHEC Final Review/Approval	31d	31-Dec-2024	30-Jan-2025							
Approval of Combined Document	0d		30-Jan-2025							
4-Statement of Basis/Proposed Plan (SB/PP)	191d	3-Feb-2025	20-Jan-2026							
SRS Prepare SB/PP (Rev.0)	69d	3-Feb-2025*	5-Jun-2025							
SRS Submit SB/PP (Rev.0) to EPA/SCDHEC	0d		5-Jun-2025							
EPA/SCDHEC Review of SB/PP (Rev.0)	60d	6-Jun-2025	4-Aug-2025							
SRS Incorporate EPA/SCDHEC Comments	60d	5-Aug-2025	3-Oct-2025							
SRS Submit SB/PP (Rev.1) to EPA/SCDHEC	0d		3-Oct-2025							
EPA/SCDHEC Final Review/Approval	30d	6-Oct-2025	4-Nov-2025							
Approval of SB/PP	0d		4-Nov-2025							
Notification of SB/PP Public Comment	14d	5-Nov-2025	18-Nov-2025							
Public Comment Period	45d	19-Nov-2025	2-Jan-2026							
Develop Responsiveness Summary	16d	5-Jan-2026	20-Jan-2026							
5-ROD	227d	5-Aug-2025	24-Sep-2026							
SRS Develop ROD (Rev.0)	82d	5-Aug-2025	5-Jan-2026							
SRS Submit ROD (Rev.0) to EPA/SCDHEC	0d		5-Jan-2026							



Activity Name	OD	Start	Finish	FY2022	FY2023	FY2024	FY2025	FY2026	FY2027
								ARF-02#480	
EPA/SCDHEC Review of ROD (Rev.0)	63d	6-Jan-2026	9-Mar-2026						
SRS Incorporate EPA/SCDHEC Comments	60d	10-Mar-2026	8-May-2026						
Submit ROD (Rev.1) to EPA/SCDHEC	0d		8-May-2026						
EPA/SCDHEC Final Review/Approval	30d	11-May-2026	9-Jun-2026						
Approval of ROD	0d		9-Jun-2026						
DOE Obtain Signature on ROD	30d	10-Jun-2026	9-Jul-2026						
SCDHEC Obtain Signature on ROD	32d	10-Jul-2026	10-Aug-2026						
EPA Obtain Signature on ROD	30d	11-Aug-2026	9-Sep-2026						
Prepare Public Notice	15d	10-Sep-2026	24-Sep-2026						
Issue ROD	0d		24-Sep-2026						
6-CMIP/RAIP	172d	10-Mar-2026	20-Jan-2027						
SRS Develop CMIP/RAIP (Rev.0)	75d	10-Mar-2026	22-Jul-2026						
SRS Submit CMIP/RAIP (Rev.0) to EPA/SCDHEC	0d		22-Jul-2026						
EPA/SCDHEC Review of (CMIP/RAIP Rev.0)	90d	23-Jul-2026	20-Oct-2026						
SRS Incorporate EPA/SCDHEC Comments	62d	21-Oct-2026	21-Dec-2026						
SRS Submit CMIP/RAIP (Rev.1) to EPA/SCDHEC	0d		21-Dec-2026						
EPA/SCDHEC Final Review/Approval	30d	22-Dec-2026	20-Jan-2027						
Approval of CMIP/RAIP	0d		20-Jan-2027						
7-LUCIP	172d	10-Mar-2026	20-Jan-2027						
SRS Develop LUCIP	75d	10-Mar-2026	22-Jul-2026						
SRS Submit LUCIP (Rev.0) to EPA/SCDHEC	0d		22-Jul-2026						
EPA/SCDHEC Review of (LUCIP Rev.0)	90d	23-Jul-2026	20-Oct-2026						
SRS Incorporate EPA/SCDHEC Comments	62d	21-Oct-2026	21-Dec-2026						

