



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

FEB 11 2025

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 Environmental Services
2600 Bull Street
Columbia, South Carolina 29201

Mr. Jon Richards
Savannah River Site Remediation Project Manager
Superfund and Emergency Management 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 Federal Facility Agreement Milestones Due for Submittal Through March 31, 2025

In accordance with the terms of Section XXXI of the Federal Facility Agreement (FFA), the U.S. Department of Energy (DOE) Savannah River Operations Office is requesting an extension for FFA Milestones due through March 31, 2025. Initially, there was verbal agreement to extend three (3) FFA deliverables, which were due in January, for thirty (30) days. Based on the January 27, 2025, discussions, and agreements among DOE, South Carolina Department of Environmental Services (SCDES), and U. S. Environmental Protection Agency (EPA), the due dates for the FFA deliverables listed in Table 1 were extended to comply with DOE-Headquarters direction and Presidential Executive Orders prior to submittal. Since the January discussion, additional conversations have occurred requiring further adjustments to the dates listed in Table 1 and the inclusion of several more FFA deliverables. Provided below is the request for a longer extension and the list of FFA deliverables affected by the request (Table 2).

Schedule That is Sought to be Changed and/or Extended

Various document submittals and SRS' responses to SCDES and EPA comments that are due from February 13, 2025, to March 31, 2025, as shown in Table 2.

Length of Extension Requested

The DOE proposes to extend the submittal dates by sixty (60) days as proposed in Table 2.

Cause of the Extension

The 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 the Parties as constituting good cause."

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Based on the February 10, 2025, follow-up discussions among DOE, SCDES, and EPA, the submittals due through March 31, 2025, are being extended an additional sixty (60) days pending direction from DOE-Headquarters.

Related Commitments or Schedules that Will Be Impacted by the Granting of The Extension

Currently, there are no other commitments or schedules that will be impacted by the granting of the extension request.

Please review the information contained in this extension request and provide your response by February 13, 2025. The effort and time that the SCDES and EPA have given on the operable units discussed in this extension request is greatly appreciated.

Questions from your or your staff may be directed to me at (803) 952-7805.

Sincerely,

**AVERY
HAMMETT**

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HAMMETT
Date: 2025.02.11 09:52:47 -05'00'

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

RDDD-25-126

cc:

M. Reese, SCDES-Columbia
H. J. Porter, SCDES-Columbia
J. Blalock, SCDES-Columbia
S. French, SCDES-Columbia
G. R. Stewart, SCDES-Columbia
M. Mehta, SCDES-Columbia
H. H. Cathcart, SCDES-Columbia
T. R. Fuss, SCDES – Midlands Aiken Environmental Affairs Office
G. O'Quinn, SCDES – Midlands Aiken Environmental Affairs Office
E. G. Downing, SCDES – Midlands Aiken Environmental Affairs Office
H. L. Herlong, SCDES – Midlands Aiken Environmental Affairs Office
B. Martin, EPA-Atlanta
J. Dawson, EPA-Atlanta

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Table 1. January 2025 Extension Requests and Notifications

Deliverable	Original Due Date	30-Day Extension Due Date
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 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) Operable Unit (OU) (U) (SRNS-RP-2023-01365, Revision 1) and Savannah River Site (SRS') Responses to the Regulatory Comments on the Revision 0 Document	January 27, 2025	February 26, 2025
FFA Appendix E, Long-Term Projections for Fiscal Year (FY) 2025 (Revision 1) and SRS' Responses to the Regulatory Comments on Revision 0 Appendix E for FY2025	January 31, 2025	March 2, 2025
Post-Construction Report for the Lower Three Runs Integrator Operable Unit (IOU) Upper Subunit (U) (SRNS-RP-2023-00109, Revision 1) and SRS' Responses to the Regulatory Comments on the Revision 0 Document	January 31, 2025	March 2, 2025

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Table 2. Extension Requests for February to March 2025 Deliverables

Deliverable	Current Due Date	Proposed Due Date
SRS' Responses to the Regulatory Comments on the Effectiveness Monitoring Report for the Monitored Natural Attenuation (MNA) at the Chemicals, Metals, and Pesticides (CMP) Pits OU (U) April 2023 through March 2024 (SRNS-RP-2024-00606, Revision 0, July 2024)	February 13, 2025	April 14, 2025
SRS' Responses to the Regulatory Comments on the 488-4D Ash Landfill Annual Groundwater Monitoring Report 2023 Data (SRNS-RP-2024-00941, Revision 0, July 2024)	February 18, 2025	April 19, 2025
SRS' Responses to the Regulatory Comments on the 2023 Groundwater Mixing Zone Report for the D-Area Oil Seepage Basin (U) (SRNS-RP-2024-01008, Revision 0, July 2024)	February 23, 2025	April 24, 2025
RFI/RI Report with BRA and CMS/FS for the ECODS L-3 (NBN), L-Area Rubble Pit (131-1L), and L-Area Rubble Pit (131-4L) OU (U) (SRNS-RP-2023-01365, Revision 1) and SRS' Responses to the Regulatory Comments on the Revision 0 Document	February 26, 2025	April 27, 2025
FFA Appendix E, Long-Term Projections for Fiscal Year (FY) 2025 (Revision 1) and SRS' Responses to the Regulatory Comments on Revision 0 Appendix E for FY2025	March 2, 2025	May 1, 2025
Post-Construction Report for the Lower Three Runs IOU Upper Subunit (U) (SRNS-RP-2023-00109, Revision 1) and SRS' Responses to the Regulatory Comments on the Revision 0 Document	March 2, 2025	May 1, 2025
Focused Early Action CMS/FS in Support of Beneficial Reuse of Select Coal Ash and Coal Fines at the A-Area Ash Pile (788-A), A-Area Coal Pile Runoff Basin (788-3A), F-Area Ash Landfill (288-F), H-Area Ash Basin (288-H), K-Area Ash Basin (188-K), and L-Area Ash Basin (188-L) Operable Units, SEMS Numbers: 61, 62, 88, 90, & 91 (SRNS-RP-2024-00222, Revision 1) and SRS' Responses to Regulatory Comments on the Revision 0 Document	March 3, 2025	May 2, 2025
Status of F/H Area Radioactive Liquid Waste Tanks Being Removed from Service Calendar Year 2024 Annual Report	March 9, 2025	May 8, 2025
RI Report with BRA for Building 716-A, Automotive Repair Shop OU (Revision 0)*	March 11, 2025	Not Applicable
SRS' Responses to the Regulatory Comments on the 2024 EMR for MNA at the L-Area Southern Groundwater (LASG) OU – Data from 2022 through 2023 (SRNS-RP-2024-00998, Revision 0, August 2024)	March 17, 2025	May 16, 2025
Focused CMS/FS for D-Area Ash Basin Wetlands (NBN) in Support of the Savannah River and Floodplain Swamp Integrator Operable Unit (SRNS-RP-2024-01034, Revision 1) and SRS' Responses to Regulatory Comments on the Revision 0 Document	March 25, 2025	May 24, 2025

* DOE submitted a revised implementation schedule for the Automotive Repair Shop OU as part of the FFA Appendix E, Long-Term Projections for FY2025 submittal (RDDD-25-104, dated November 13, 2024). The implementation schedule combined the Revision 0 RI Report with BRA with the Revision 0 FS into a Revision 0 RI/BRA Report with FS that has a due date of September 30, 2025. Due to the delay in the submittal of the FFA Appendix E, Long-Term Projections for FY2025 (Revision 1) for regulatory approval, the removal of the RI Report with BRA submittal is included in this table.