



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF REMEDIATION - DOE OVERSIGHT OFFICE
761 EMORY VALLEY ROAD
OAK RIDGE, TN 37830

November 25, 2015

Mr. John Michael Japp
Federal Facility Agreement Manager
Department of Energy
Oak Ridge Operations Office
PO Box 2001
Oak Ridge, TN 37831

Dear Mr. Japp

Re: Extension Requests for Remedial Investigation / Feasibility Study for Comprehensive Environmental Response, Compensation, and Liability Act Oak Ridge Reservation Waste Disposal, Oak Ridge, TN (DOE/OR/01-2535&D4), Focused Feasibility Study for Water Management for the Disposal of CERCLA Waste on the Oak Ridge Reservation, Oak Ridge, Tennessee (DOE/OR/01-2664&D2), and Associated Appendix E Milestones.

The Tennessee Department of Environment and Conservation Division of Remediation has reviewed the above referenced extension requests (B. Henry and J. Japp to J. Crane and R. Young dated November 18, 2015) pursuant to Section XXX.D of the Federal Facilities Agreement. Based on the review, the State approves the requested extensions for the submittals as provided below:

- A four months extension for submission of *Remedial Investigation / Feasibility Study [RI/FS] for Comprehensive Environmental Response, Compensation, and Liability Act Oak Ridge Reservation Waste Disposal, Oak Ridge, TN (DOE/OR/01-2535&D4)*. With the requested extension, the response to comments on the D3 RI/FS and the D4 revision of the RI/FS are due to be submitted by March 18, 2016.
- A three months extension for the submission of *Focused Feasibility Study [FFS] for Water Management for the Disposal of CERCLA Waste on the Oak Ridge Reservation, Oak Ridge, Tennessee (DOE/OR/01-2664&D2)*. With the requested extension, the D2 revision of the FFS is due to be submitted by February 25, 2016.
- A four month extension for the Appendix E milestones for submission of the D1 Environmental Management Disposal Facility (EMDF) Proposed Plan(PP), D1 EMDF Record of Decision (ROD), and the D1 EMDF Remedial Design Work Plan (RDWP).

Mr. Japp
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November 25, 2015

| Previous FFA Milestones | | Revised FFA Milestones | |
|-------------------------|-----------|------------------------|-----------|
| D1 EMDF PP | 1/15/2016 | D1 EMDF PP | 5/15/2016 |
| D1 EMDF ROD | 9/22/2016 | D1 EMDF ROD | 1/22/2017 |
| D1 EMDF RDWP | 1/11/2017 | D1 EMDF RDWP | 5/11/2017 |

Questions or comments concerning the contents of this letter should be directed to Howard Crabtree at the above address or by phone at (865) 220-6571.

Sincerely



Randy Young
Acting FFA Project Manager

xc Brian T. Henry, DOE
Dave Adler, DOE
Patricia Halsey, DOE
Jeff Crane, EPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 4
 ATLANTA FEDERAL CENTER
 61 FORSYTH STREET
 ATLANTA, GEORGIA 30303-8960

Routed to: RCY

December 8, 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
 4SD

Mr. John Michael Japp
 Federal Facility Agreement Manager
 Department of Energy
 Oak Ridge Office of Environmental Management
 P.O. Box 2001
 Oak Ridge, Tennessee 37831

SUBJ: D2 Environmental Management Disposal Facility
 Remedial Investigation/Feasibility Study for
 CERCLA Oak Ridge Reservation Waste Disposal
 Extension Request (Letter of November 18, 2015; Japp to Crane and Young)
 DOE Oak Ridge Reservation
 Oak Ridge, Tennessee

Dear Mr. Japp:

The Environmental Protection Agency (EPA) completed its review of the subject extension request and hereby concurs with the good cause and the duration of the delay for the subject document and the subsequent milestones.

In accordance with Section XXX.D of the Federal Facility Agreement (FFA), the following milestone extensions are approved for subsequent modification to the FFA Appendix E milestones. It is noted that the 2018 milestone for a Remedial Design Report has not been modified at this time. A milestone modification form should be used to process the revision to Appendix E for the first three milestones listed as follows.

| Current FFA Milestone | | Proposed FFA Milestone | |
|-----------------------------------|-----------|-----------------------------------|-----------|
| EMDF Proposed Plan D1 | 1/15/2016 | EMDF Proposed Plan D1 | 5/15/2016 |
| EMDF Record of Decision D1 | 9/22/2016 | EMDF Record of Decision D1 | 1/22/2017 |
| EMDF Remedial Design Work Plan D1 | 1/11/2017 | EMDF Remedial Design Work Plan D1 | 5/11/2017 |
| EMDF Remedial Design Report D1 | 9/30/18 | EMDF Remedial Design Report D1 | 9/30/18 |

Due to the extensive nature of the revisions to the subject D1 document, EPA anticipates that an additional thirty (30) days may be necessary to review the D2 document.

If you have any questions regarding this matter, please call me at (404) 562-8546.

Sincerely,



Jeffrey L. Crane
FFA Project Manager
Restoration & DOE Coordination Section
Superfund Division

cc: Randy Young, TDEC
Pat Halsey, DOE ORR
SSAB



Department of Energy

Oak Ridge Office of Environmental Management
P.O. Box 2001
Oak Ridge, Tennessee 37831

| PROGRAM | SITE | PROJECT # | FILE SEQUENCE |
|---------|------|-----------|---------------|
| | | | |

November 18, 2015

ROUTE TO: RCU

RECEIVED 1:30 P.M.
NOV 19 2015

Mr. Jeffrey L. Crane
U.S. Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street S.W.
Atlanta, Georgia 30303-8960

Mr. Randy Young
Tennessee Department of Environment
and Conservation
DOE Oversight Division
761 Emory Valley Road
Oak Ridge, Tennessee 37830-7072

cc/HLC

Dear Mr. Crane and Mr. Young:

EXTENSION REQUESTS FOR THE APPENDIX E MILESTONES AND RESPONSE TO COMMENTS, TWO DOCUMENT VERSIONS CURRENTLY PENDING APPROVAL FOR THE ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY PROJECT

In accordance with the *Federal Facility Agreement for the Oak Ridge Reservation* (FFA) Section XXX (Extensions), the Department of Energy (DOE) requests the following:

- An additional four months for submitting the D4 version of the *REMEDIATION INVESTIGATION/FEASIBILITY STUDY (RI/FS) FOR COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) OAK RIDGE RESERVATION WASTE DISPOSAL, OAK RIDGE, TN* (DOE/OR/01-2535&D4).
- An additional three months for submitting the D2 version of the *FOCUSED FEASIBILITY STUDY (FFS) FOR WATER MANAGEMENT FOR THE DISPOSAL OF CERCLA WASTE ON THE OAK RIDGE RESERVATION, OAK RIDGE, TENNESSEE* (DOE/OR/01-2664&D2).
- Approval to extend the Appendix E milestone dates for submission of the Environmental Management Disposal Facility (EMDF) Proposed Plan (PP) and subsequent milestones for submission of the EMDF Record of Decision (ROD) and the EMDF Remedial Design Work Plan (RDWP).

Scope, schedule and date that sought to be defined/extended: The current date for submittal of the response to comments and the D4 version of the RI/FS document is November 18, 2015. The current date for submittal of the response to comments and the D2 version of the FFS document is November 25, 2015. The current Appendix E milestones and the proposed milestones for this project are in the table below.

| Current FFA Milestones | | Proposed FFA Milestones | |
|------------------------|-----------|-------------------------|-----------|
| EMDF PP D1 | 1/15/2016 | EMDF PP D1 | 5/15/2016 |
| EMDF ROD D1 | 9/22/2016 | EMDF ROD D1 | 1/22/2017 |
| EMDF RDWP D1 | 1/11/2017 | EMDF RDWP D1 | 5/11/2017 |

EXTENSION REQUESTS FOR THE APPENDIX E MILESTONES AND RESPONSE TO COMMENTS, TWO DOCUMENT VERSIONS CURRENTLY PENDING APPROVAL FOR THE ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY PROJECT

Length of Extension: The requested new date for the RI/FS document is March 18, 2016. The requested new date for the FFS document is February 25, 2016. The length of the extension for the EMDF PP and subsequent document milestones is four months, as presented in the table on page 1 of this letter.

Good cause for extension: The good cause reason for these extensions is the additional work required to complete the responses to comments (FFA Section XXX.B.5 & 6), to achieve "consensus to the maximum extent possible" (FFA Section XXI.G.5), and to prepare the comment response documents for approval (FFA Section XXI.G.5). This additional time is needed to discuss the responses to comments and the revisions to the subsequent documents with the Project Team.

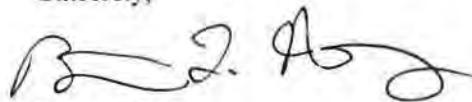
The three and four month delays to the FFS and the RI/FS documents should provide sufficient issue resolution to result in a PP that better reflects chosen alternatives of the three parties to the FFA. Based on this premise, the project team has agreed to a four month extension to the EMDF PP FFA milestone and the two subsequent Appendix E milestones, as shown in the table on page 1 of this letter.

Related schedules impacted if extension granted: At this time, it is not known if additional changes will become necessary to the current Appendix J non-enforceable milestones. Other project and subproject schedules may be impacted if this facility is not available based on the current schedule in Appendix J. It is very important to keep this project in line with the three-party program priority agreements to build this additional onsite disposal facility for future FFA waste.

Description of project implementation strategy: The EMDF project implementation strategy is to continue open communication of project status, issues, and schedules with the Project Team. The Project Team will be kept informed (annually on April 1) of the capacity remaining at the Environmental Management Waste Management Facility and the funded/budgeted projects prioritized (annually, prior to or by February 15) to ensure that all parties are aware of the time constraints for having this disposal facility designed and constructed for use, and the subprojects that will require the use of EMDF.

If you have any questions or if we can be of further assistance, please contact Brian Henry at (865) 241-8340 or John Michael Japp at (865) 241-6344.

Sincerely,



Brian T. Henry
Acting Portfolio Federal Project Director



John Michael Japp
Federal Facility Agreement Project Manager

See page 3 for cc list.

EXTENSION REQUESTS FOR THE APPENDIX E MILESTONES AND RESPONSE TO COMMENTS, TWO DOCUMENT VERSIONS CURRENTLY PENDING APPROVAL FOR THE ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY PROJECT

cc:

Howard Crabtree, TDEC, Oak Ridge

Sid Garland, RSI, K-1580, MS-7119

Julie Pfeffer, UCOR, K-1225, MS-7294

Annette Primrose, UCOR, 99830GV, MS-7608

Tanya Salamacha, UCOR, K-1580, MS-7119

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Susan DePaoli, P2S

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