



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

February 9, 2017

Mr. John Michael Japp
DOE FFA Project Manager
PO Box 2001
Oak Ridge TN 37831-8540

Dear Mr. Japp

Federal Facility Agreement Milestone Extension Request for Environmental Management Disposal Facility Record of Decision, Remedial Design Work Plan, Remedial Design Report, and Remedial Action Work Plan

The Tennessee Department of Environment and Conservation, Division of Remediation, has reviewed the above referenced request pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. Because of the unresolved technical issues associated with this project, the State approves the milestone extension requests. The new submittal dates will be March 16, 2018 for the EMDF ROD D1; December 18, 2018 for the EMDF RDWP D1; and November 22, 2019 for the EMDF RDR/RAWP D1.

Questions or comments concerning the contents of this letter should be directed to Brad Stephenson at (865) 481-0995.

Sincerely

A handwritten signature in black ink that reads "Randy Young".

Randy Young
FFA Manager

xc Jeff Crane, EPA
Howard Crabtree, TDEC, Oak Ridge
Amy Fitzgerald, ORRCA
Pete Osborne - SSAB
Julie Pfeffer, UCOR, K-1580, MS-7119
Rich Campbell, EPA Region IV
Susan DePaoli, Pro2Serve
Tanya Salamacha, UCOR, K-1580, MS-7119
Pat Halsey, EM-942



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

PROGRAM	SITE	PROJECT #	DATE
ROUTE TO: RCY			
			JBS

February 28, 2017

MAR - 3 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Dear Mr. Japp:

The Environmental Protection Agency (EPA) has received the Department of Energy (DOE) letter requesting an extension for the submittal of several documents (see chart below) related to the Environmental Management Disposal Facility. The request was submitted from DOE on February 7, 2017 and received by the EPA on February 9, 2017.

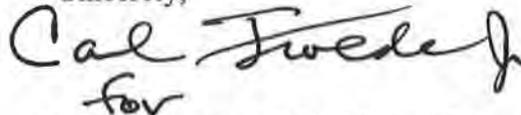
Current FFA Response Milestones		Proposed FFA Response Milestones	
ROD	03/09/2017	ROD	03/16/2018
RDWP	06/26/2017	RDWP	12/18/2018
RDR	09/30/2018	RDR/RAWP	11/22/2019 (Appendix J)
RAWP	09/30/2019		

This extension is to allow sufficient time to resolve issues with the disposal facility's conceptual design due to the geologic complexity of its location in Bear Creek Valley. This necessary delay could also impact the waste disposal management of the Environmental Management Waste Management Facility and the EPA will rely on DOE updates and the annual Phase Construction Completion Reports to be kept aware of its capacity.

The EPA approves the proposed changes to the milestone deliverable dates.

Please direct any questions concerning this matter to Carl Froede Jr at (404) 562-8550 or froede.carl@epa.gov.

Sincerely,

Handwritten signature of Carl Froede Jr in black ink.

for
Jeffery L. Crane, FFA Project Manager
Restoration and DOE Coordination Section
Restoration and Site Evaluation Branch
Superfund Division

cc: B.T. Henry, DOE
D. Adler, DOE
P. Halsey, DOE
R. Young, TDEC
H. Crabtree, TDEC
SSAB



Department of Energy

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

PROGRAM	SITE	PROJECT #	FILE SEQUENCE

ROUTE TO: RCY

February 7, 2017

RECEIVED 1:21 P.M.
FEB - 7 2017

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

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

CC
HLC

Dear Mr. Crane and Mr. Young:

FEDERAL FACILITY AGREEMENT MILESTONE EXTENSION REQUEST FOR ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY RECORD OF DECISION, REMEDIAL DESIGN WORK PLAN, REMEDIAL DESIGN REPORT, AND REMEDIAL ACTION WORK PLAN

In accordance with the *Oak Ridge Federal Facility Agreement (FFA) for the Oak Ridge Reservation*, the U.S. Department of Energy (DOE) requests your approval to modify the Appendix E milestone date for submission of the Record of Decision (ROD), the Remedial Design Work Plan (RDWP), the Remedial Design Report (RDR), and the Remedial Action Work Plan (RAWP) for the Environmental Management Disposal Facility (EMDF).

Schedule and date that is sought to be extended: The following modification requests are listed below:

Current FFA Response Milestones		Proposed Response Milestones	
ROD	03/09/2017	ROD	03/16/2018
RDWP	06/26/2017	RDWP	12/18/2018
RDR	09/30/2018	RDR/RAWP	11/22/2019 (Appendix J)
RAWP	09/30/2019		

FEDERAL FACILITY AGREEMENT MILESTONE EXTENSION REQUEST FOR ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY RECORD OF DECISION, REMEDIAL DESIGN WORK PLAN, REMEDIAL DESIGN REPORT, AND REMEDIAL ACTION WORK PLAN

Length of extension: This would delay the Appendix E milestones for the ROD a year and 18 months for the RDWP from the current Appendix E submittal dates. The RDWP delay incorporates time for conceptual design, which is needed for its development. The delays for the RDR and RAWP milestones would move those Appendix E milestones into Appendix J, respectively 14 months and 2 months and would combine the reports into a single submittal (RDR/RAWP).

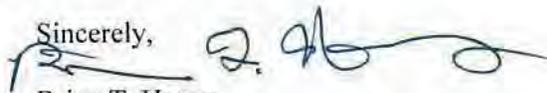
Good cause for extension: Per FFA Subsection XXX.B.6 good cause, a delay in the schedule has been agreed to by the FFA parties. The current FFA milestones were established assuming the EMDF Remedial Investigation/Feasibility Study (RI/FS) D4 version could have been approved within a 60-day period. However, because of the informal dispute of the D4 and the need to develop a D5 version, the Project Team has agreed to extend the milestones.

Related schedules impacted if extension granted: The updated Proposed Plan is expected to be approved by the parties and available for public review by September 2017. It is anticipated that additional changes to Appendix J, *Non-Enforceable Project Milestones*, may be needed. However, the extent of these extensions can only be assessed once the Record of Decision is approved.

Description of project implementation strategy: The EMDF Project strategy is to continue open communication of project status, issues, and schedules with the Project Team. The Project Team will be kept informed of the capacity remaining at the Environmental Management Waste Management Facility via the annual Phase Construction Completion Report. All parties will be kept aware of the time constraints for having this disposal facility designed and constructed for future projects requiring the use of the EMDF.

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

Sincerely,



Brian T. Henry
Portfolio Federal Project Director



John Michael Japp
Federal Facility Agreement Project Manager

cc:

Howard Crabtree, TDEC, Oak Ridge
Julie Pfeffer, UCOR, K-1580, MS-7119
Rich Campbell, EPA Region IV
Susan DePaoli, Pro2Serve
Tanya Salamacha, UCOR, K-1580, MS-7119
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