

## Future Activity Allowance Determination Matrix for TW-01 Aquifer Test Work Plan

Work Variance Request No. Not Applicable Date: 4/8/2021

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Future Activity Allowance is an activity that is not considered in the remedy design but necessary to support the project objectives. Future Activity Allowance is a Material Deviation which is defined in the final groundwater remedy design as: Material Deviation means a change or correction required to prevent a condition that would (1) render the approved design non-compliant with codes, regulations, and /or engineering standard of practices, (2) render planned well locations and/or constructions fail to meet the project objectives, (3) cause significant schedule delay, and/or (4) cause a significant increase in costs. (CH2M Hill, 2015)

According to the SEIR Project Description, "The inclusion of the Future Activity Allowance is not intended to account for minor adjustments (work variances) of the remedy design during construction resulting from field conditions. DTSC's objective for the inclusion of the Future Activity Allowance is to consider the potential impacts of needing to take additional but previously unforeseen activities that were not contemplated as part of the Final Remedy Design but are activities that would improve the performance of the remedy, or are necessary to gather additional information on the remedy performance, and/or aid in the transition of the active remedy to monitored natural attenuation." (ESA, 2017)

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1. Are all components of the work plan in the approved final design as reviewed in the SEIR?  
 Yes  No
  
2. Are all components of the work plan staying within an infrastructure alignment in the approved final design?  
 Yes  No

If answers to both 1 and 2 are Yes, STOP – action is not Future Activity Allowance

3. For components not in approved final design, will the work plan require new access not identified for use in the final design and create new ground disturbance beyond those anticipated in final design?  
 Yes  No

If answer is No, STOP – action is not Future Activity Allowance. If Yes, proceed...

4. For components not in approved final design and require new access or new ground disturbance, will the ground disturbing activity be outside the 2018 SEIR project boundary?  
 Yes  No

If answer is Yes, STOP – action is subject to additional CEQA evaluation. WVR approval will be considered after DTSC completes CEQA determination.

5. For workplan requiring new access and/or new ground disturbance, but project components are in approved final design and within the 2018 SEIR project boundary, is the variance necessitated by field conditions which are outside the control of the operator (e.g. refusal during drilling, unstable ground, existing design jeopardizes health and safety, modification to avoid archaeological resource, existing design does not conform to engineering standards, etc.)?  
 Yes  No

If answer is No or otherwise explained in Section 7 below, action is Future Activity Allowance, follow Communication Protocol for Future Activities Allowance, Exhibit 3 to the Statement of Decision and Resolution of Approval. If the answer is Yes, action is Future Activity Allowance, and DTSC will work with Tribes to meet the time sensitivity of the work plan. Regardless of response, because of new access and/or new ground disturbance, work plan action may be subject to Federal Consultation. Inquire with BLM to determine whether there is a need to follow Consultation during Construction protocol.

6. Does the addition of work plan cause an exceedance from infrastructure limits specified in the 2018 certified Final SEIR (Table 3-1 for well boreholes; Table 3-2 for pipeline trenches, electrical/communication conduit, roadway improvements, or sizes of buildings and structures; Table 3-4 for volume of soil disturbance and Table 3-5 for water usage)?

Yes  No

If answer is Yes, STOP – action is subject to additional CEQA evaluation. work plan approval will be considered after DTSC completes a CEQA checklist to determine if there are new or substantially more significant environmental impacts than disclosed in the 2018 SEIR.

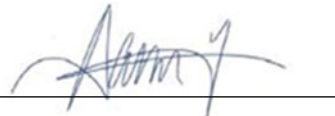
7. Other extenuating circumstances or information for FAA considerations:  No

Yes – provide information and/or justification

See **Attachment A**.

Conclusion: TW-01 Aquifer Test Work Plan  is not a FAA  is a FAA

Signature of DTSC reviewer: \_\_\_\_\_



Date: 4/8/2021



