

Handout 4B
Schedule Highlights
Summary of Key Schedule Changes

CWG Meeting
October 5, 2010

Schedule Highlights

Status of 3 Key Documents

Final Environmental Impact Report/Record of Decision/Programmatic Agreement

- **DTSC Final Environmental Impact Report and Responsive Summary**
 - Received over 560 comments
 - Evaluating and responding to the comments
 - Target date is uncertain until Response to Comments are complete
- **DOI Record of Decision and Responsiveness Summary**
 - Target completion - 11/30/2010
- **Programmatic Agreement**
 - Target completion – 11/10/2010

Forecast of East Ravine Phase2/ Compressor Station Wells Activities

- Work Plan (WP) Addendum
 - 3/16/10 and 4/15/10 – Presented process and proposed well locations/rationale to TWG
 - 7/28 – Directed PG&E to submit WP Addendum for specified well locations
 - 8/27 – PG&E submitted Draft WP Addendum
 - 9/13 – DTSC sent Draft WP Addendum to CWG/TWG after initial review/concurrence on general approach
 - 9/14 - 10/14 – CWG/TWG and Agencies review
 - 9/23 – 12/7 - Section 106 consultation
 - Finalize WP Addendum (anticipate January 2011)
 - Agencies approve WP Addendum (anticipate January 2011)
- Field Implementation – anticipate start March 2011

Forecast of Key Soil Activities

- Soil Part A (Outside Compressor Station)
 - 9/16/10 – Draft Part A Data Gaps Evaluation Report to CWG/TWG
 - Early October-Mid November– hold working sessions with Tribes/Stakeholders
 - Review Part A data, discuss any potential data gaps (areas where more investigation is needed)
 - Complete Data Quality Objectives (DQO) Steps 6-7
 - Feb 2011 – Phase II Work Plan to CWG/TWG
 - Start stakeholders review period - 30 calendar days
 - Section 106 consultation
 - June 2011 – Agencies approve Phase II Work Plan
 - August 2011 – Start field implementation

Forecast of Key Soil Activities

- Soil Part B (Inside Compressor Station)
 - Mid December 2010 – Draft Part B DQO Technical Memorandum to CWG/TWG
 - March 2011 – Part B Work Plan to CWG/TWG
 - Start stakeholders review period - 30 calendar days
 - Section 106 consultation
 - Late July 2011 – Agencies approve Part B Work Plan
 - September 2011 – Start field work

Summary of Key Schedule Changes

Handout 4B

Summary of Key Schedule Changes since August 15, 2007 (Rev. 10)

October 2010 changes highlighted in Yellow – changes are from June 16, 2010

Activities	Forecast Schedule Deviation	Key Reasons
Groundwater Plume		
East Ravine Groundwater Investigation Phase 2/ Compressor Station Wells Work Plan Addendum and Approvals (Lines 546-565)	<ul style="list-style-type: none"> • FF 10/13/2010 (Rev. 8). • FF 11/26/2010 (Rev. 9). • FF 1/20/2011 (Rev. 10). 	<ul style="list-style-type: none"> • Anticipate agencies' direction on well locations on June 2, 2010 (after 4/15 TWG meeting). • Received agencies' direction on well locations on July 28, 2010.
East Ravine Groundwater Investigation Phase 2/ Compressor Station Wells Field Implementation (Lines 566-575)	<ul style="list-style-type: none"> • FF 12/2/2011 for field implementation (Rev. 9). • FF 1/27/2012 for field implementation (Rev. 10). 	<ul style="list-style-type: none"> • Duration of field work will be verified after receipt of work plan approval.
Remedy Selection/ Statement of Basis (Lines 1231-1237)	<ul style="list-style-type: none"> • DTSC approval of Final Remedy – delay FF from 2/14/2010 to 8/27/2010 (6 mos) (Rev. 3). • Schedule adjusted to reflect the change in CMS/FS schedule. DTSC approval of Final Remedy is 1/22/2010 (Rev. 4). • Extend FF from 1/22 to 2/12/2010 (Rev. 5). • Extend FF from 2/12 to 6/15/2010 (Rev. 6). • Extend FF from 6/15/2010 to 10/18/2010 (Rev. 7). • Extend FF from 10/18 to 	<ul style="list-style-type: none"> • Public notice package delay due to cascading delay from CMS/FS Groundwater. • Extension of DTSC approval of Final Remedy due to: a) cascading delay from CMS/FS Groundwater, b) the new DTSC-requested FF linkage from Public Review of Draft EIR to Public Notice/Comment Period of Statement of Basis; also increase duration of review period from 45 edays to 60 edays, and c) the new DTSC-requested FF linkage from DTSC approval of Final Remedy to Final EIR certified. • Cascading delay from CMS/FS (due to delay in RA). • Cascading delay from Groundwater CMS/FS. • Align timeframe for public comment/public notice of Statement of Basis and the Draft EIR. • Delay start of public comment period from 4/27 to 6/4, and reduce the duration from 60 to 45 calendar days.

	11/8/2010 (Rev. 8).	
NOP and Scoping/ Program EIR (Lines 1290-1358)	<ul style="list-style-type: none"> • Extend NOD from 4/20/2009 to 8/27/2010. • Extend NOD filing date to 9/28/2010. • Schedule adjusted to reflect the change in CMS/FS schedule. NOD filing date is 1/22/2010 (Rev. 4). • Extend FF from 1/22 to 2/12/2010 (Rev. 5). • Extend FF from 2/12 to 6/15/2010 (Rev. 6). • Extend FF from 6/15 to 10/18/2010 (Rev. 7). • Extend FF from 10/18 to 11/8/2010 (Rev. 8). 	<ul style="list-style-type: none"> • Extension of NOD due to: a) cascading delay from CMS/FS Groundwater, b) the new DTSC-requested FF linkage from Public Review of Draft EIR to Public Notice/Comment Period of Statement of Basis; also increase duration of review period from 45 edays to 60 edays, and c) the new DTSC-requested FF linkage from DTSC approval of Final Remedy to Final EIR certified. • Change selected links between tasks for Draft EIR – does not impact completion dates. • Cascading delay from Approval of Final Remedy. • Adjust Draft EIR timeframe to reflect revised CMS/FS schedule and coordination with the development of the Statement of Basis. • Set public comment period as 4/27/2010 to 6/27/2010. • Reduce the duration of Final EIR from 101.5 to 80.4 work days. • Delay start of public comment period from 4/27 to 6/4, and reduce the duration from 60 to 45 calendar days. Provide Advanced Draft EIR to Tribes and TLP on 4/27/10.
Proposed Plan/ROD (Lines 1246-1256)	<ul style="list-style-type: none"> • Delay FF from 4/15/10 to 6/17/10 (Rev. 2) • Extend FF from 6/17 to 7/21/2010. • Schedule adjusted to reflect the change in CMS/FS schedule. ROD issuance date is 12/5/2009 (Rev. 4). • Extend FF from 12/5 to 1/25/2010 (Rev. 5). • Extend FF from 1/25/2010 to 6/16/2010 (4+ months) (Rev. 6). • Extend FF from 6/16 to 11/30/2010 (Rev. 7). 	<ul style="list-style-type: none"> • Cascading delay from CMS/FS (due to delay in RA). • Revise the “Tribal review/comment period” step to “Tribal Consultation (Section 106) followed by SHPO Consultation (Section 106)”. • Cascading delay from Groundwater CMS/FS. • Synchronized DTSC and DOI public review/comment period on the Statement of Basis and the Proposal Plan (increased DOI’s duration from 45edays to 60edays). Added a 30-days response to public comments period on the Proposed Plan. • Increased the duration of DOI Approval Process for ROD from 60 to 90edays. • Cascading delay from CMS/FS. • Align timeframe for public comment of Proposed Plan and Statement of Basis/Draft EIR. • Delay start of public comment period from 4/27 to 6/4, and reduce the duration from 60 to 45 calendar days. • Start Tribal Consultation on 3/12. • Reduce DOI approval process from 90 to 74 calendar days.
Section 106 Programmatic Agreement	<ul style="list-style-type: none"> • FF 9/15/2010 (Rev. 7). • FF 10/19/2010 (Rev. 9). • FF 11/10/2010 (Rev. 10). 	<ul style="list-style-type: none"> • The Draft PA schedule is under development and is subject to change pending discussion with Consulting Parties. • Reflect delay in Draft PA from 5/15 to 6/19/2010.

(Lines 1268-1288)		<ul style="list-style-type: none"> • Reflect an extension (from August 30 to September 10, 2010) for Consulting Parties to review/comment on Final Draft PA.
CMI/RD/RA/ Construction/Start of Operation of Final Remedy	<ul style="list-style-type: none"> • Delay FF by 6 mos (from 11/24/11 to 5/7/12) • Schedule adjusted to reflect the change in CMS/FS schedule and revised remedy selection timeframe. 	<ul style="list-style-type: none"> • Cascading delay from Program EIR and DTSC approval of Final Remedy. • Cascading delay from CMS/FS (due to delay in RA). • Cascading delay from Groundwater CMS/FS. • Rearrange steps to align RCRA/CERCLA processes and current review processes (e.g., start Section 106 Consultation at the same time as other review of prelim/final design).
Soil		
RFI/RI Volume 1 Addendum	Forecast duration of 7.5 months, linked to RFI Vol. 3 report (target to complete 3 months prior to start of Vol. 3).	<ul style="list-style-type: none"> • To incorporate MW-20 bench and IM3 Treatment Plant as potential AOCs. • Reflect revised Part A and B schedule.
Part A Phase 1 field implementation/data gaps evaluation (Lines 691-766)	<ul style="list-style-type: none"> • Extend FF from 7/31/08 to 9/15/09 (Rev. 1) • Extend FF from 9/15/08 to 11/24/08 (Rev. 2) • Extend FF to 3/11/09 (Rev. 3). • Extend FF from 3/11/09 to 4/30/09 (Rev. 5). • Extend FF from 4/30 to 11/5/09 (Rev. 6). • Extend FF from 11/5/09 to 6/9/10 (Rev. 7). • Extend FF from 6/9/10 to 11/25/10 (Rev. 8). • Reduce FF from 11/25/10 to 11/15/10 (Rev. 9). • Reduce FF from 11/15/10 to 11/12/10 (Rev. 10). 	<ul style="list-style-type: none"> • Site kick-off meeting - August 21, 2008. • Add DTSC/DOI review/concurrence on the approach in the Soil Background Technical Memorandum (duration of 2 weeks). • Field implementation - FF was 10/9/08, AF was 10/23/08 (2 wks extension due to field conditions encountered at AOC-4 requiring additional discussion with agencies). In addition, 2 wks extension in laboratory analysis of soil background samples due to matrix issues. • Added details for TM#4 - agency review/approvals of screening values for organic COPECs. • Added Tribal review/comment of Soil Background TM. • Extend FF for TM#4 from 1/9 to 1/19/09 and add DQO documentation and stakeholder review/agencies approval process. These two factors add about 2-3 weeks to the overall Part A Data Gaps Evaluation schedule (discussed at January 7 RCRA/CERCLA meeting). • Schedule extension reflected additional review time for soil tech memos (lower priority than groundwater) and adding time for response to comments for Soil Background TM and ECV TM#4. • Received agencies concurrence on Soil Background TM (5/12/09) and ECV TM#4. • DTSC provided comments on soil DQO TM (8/14/09). • Add time to resolve DQO TM comments related to risk assessment (anticipate completion early November, lower priority than GWRA). • Modify Data Gaps Evaluation process as follows:

		<ul style="list-style-type: none"> • Add time for agencies/tribes to review data gaps evaluation packages for each AOC (include maps, tables, and if applicable, proposed Phase 2 locations/rationale). • After receipt of comments, PG&E will prepare/submit RTCs. • Add Comments Resolution meeting after agencies/Tribes review RTCs. • After comments resolution is complete, PG&E prepares/submits Data Gaps Evaluation Tech Memo (incorporate resolved comments). • Agencies review/concur with Tech Memo. • Add time for agency review of Draft Part A DQO Tech Memo. • Add time for PG&E to revise Part A DQO Tech Memo. • Adjust schedule to reflect State of CA furlough ending 6/1/2010. • Add time to prepare/submit Data Summary Report (DQO steps 6-7), and time for meeting to discuss with Tribes/Stakeholders. • Modify the Part A data gaps evaluation process (DQO Steps 6-7) to maximize early inputs from Tribes/Stakeholders. The modified process is envisioned to include several working sessions between agencies, Tribes/Stakeholders, and PG&E over a 6-week period. The goal of the working sessions is to go over the data and discuss any potential data gaps (areas where more investigation is needed). Adjustments to the process will be made as needed based on participants' inputs and feedback. • DTSC sent the Draft Data Gaps Evaluation Report to CWG/TWG 2 days early.
<p>Part B Draft/Final Work Plan/Work Plan Approvals (Lines 804-868)</p>	<ul style="list-style-type: none"> • Extend FF by 1.5 mos. • Extend FF by 2 weeks • Submitted Response to Comments on 5/5/08. • Submitted letter on Part B phasing on 7/17/08. In agencies review (Rev. 4). • PG&E submitted details on approach to Part B Phase 1 on 9/30/08. In agencies review (Rev. 5). Part B is on hold until agencies complete this review (Rev. 6). • Extend FF to 12/1/2011 (Rev. 7). • Reduce FF to 1/19/2011 (Rev. 	<ul style="list-style-type: none"> • 1 month due to DQO discussion and past data evaluation. • 0.5 month due to incorporation of perimeter sampling walk/ verification. • Additional time for agency review of Part B Work Plan. • DTSC completed review of Part B Phase 1 proposal (7/2/09), issued request letter to PG&E. • PG&E responded to DTSC's 7/2/09 letter (8/14/09). • PG&E received DTSC's final direction on Part B (10/5/09), to resume Part B activities in February 2010. • Added time for agency review and direct on conflicting comments on Draft Part B Work Plan. • Adjusted schedule to reflect State of CA furlough ending 6/1/2010. • Align the start of Section 106 Consultation with the start of stakeholders/agencies review of Final Part B Work Plan. • Added time for preparation/submittal/concurrence with Draft DQO TM. • Added time for preparation/submittal of Draft DQO TM.

	<ul style="list-style-type: none"> 8). • Extend FF to 5/25/2011 (Rev. 9). • Extend FF to 7/28/2011 (Rev. 10). 	
RFI/RI Vol. 3/Risk Assessment-Soil/CMS/FS-Soil (Lines 1213 - 1229)	<ul style="list-style-type: none"> • Extend FF for CMS/FS from 11/10/11 to 2/21/12 (Rev. 2) • Extend FF for CMS/FS from 2/21/12 to 7/3/2012 (Rev. 3). • Extend FF from 7/3 to 8/21/2012 (Rev. 5). • Extend FF from 8/12 to 2/15/2013 (Rev. 6). • Extend FF from 2/15/2013 to 12/4/2013 (Rev. 7). • Extend FF from 12/4/2013 to 5/16/2014 (Rev. 8). • Reduce FF to 5/14/2014 (Rev. 9). • Extend FF to 5/23/2014 (Rev. 10). 	<ul style="list-style-type: none"> • Approx. 2 months due to cascading delay from Part A Phase 1 workplan/ approval/permitting. • 1 month from adding a link between tribal review of CMS/FS and PG&E response to comments. • Cascading delay from Part A approval. • Cascading delay from Part A Phase 1 data gaps evaluation. • Revise the Soil CMS/FS steps to mirror the Groundwater CMS/FS steps <ul style="list-style-type: none"> • E.g., discussion draft, draft, resolution to comments, final. • Use the duration of the Groundwater CMS/FS steps as placeholders. • Keep the sequential order of RFI/RI and Risk before CMS/FS. • Reflect revised Part A and B schedule. • Added time for "Prepare Response to Comments" before CMS/FS comments resolution. • Reflect revised Part A and B schedule.
Public Notice/Statement of Basis/Supplemental EIR (Lines 1361-1371)	<ul style="list-style-type: none"> • Extend NOD from 12/13/2011 to 7/27/2012 • Extend NOD from 7/27/12 to 12/7/2012 (Rev. 3). • Extend NOD from 12/7 to 1/25/2013 (Rev. 5). • Extend NOD from 1/25 to 7/22/2013 (Rev. 6). • Extend NOD from 7/22/2013 to 5/8/2014 (Rev. 7). • Extend NOD from 5/8/2014 to 11/20/2014 (Rev. 8). • Reduce NOD to 11/16/2014 (Rev. 9). • Extend NOD to 10/27/2014 (Rev. 10). 	<ul style="list-style-type: none"> • Cascading delay from CMS/FS Soil • Addition of links from a) Supplemental EIR public comment to Statement of Basis public comment and b) Supplemental EIR certification to DTSC approval of Soil Remedy. • Cascading delay from CMS/FS Soil. • Reflect revised Part A and B schedule.

<p>Proposed Plan/ROD (Lines 1257-1267)</p>	<ul style="list-style-type: none"> • Extend FF from 5/26/2012 to 9/6/2012 • Extend FF from 9/6 to 1/17/2013. • Extend FF from 1/17 (Rev. 4) to 3/7/2013 (Rev. 5). • Extend FF from 3/7 to 11/20/2013 (Rev. 6). • Extend FF from 11/20/2013 to 9/8/2014 (Rev. 7). • Extend FF from 9/8/2014 to 02/18/2015 (Rev. 8). • Reduce FF to 2/16/2015 (Rev. 9). • Extend FF to 2/25/2015 (Rev. 10). 	<ul style="list-style-type: none"> • Cascading delay from CMS/FS Soil. • Increased the duration of DOI Approval Process for ROD from 60 to 90days. • Reflect revised Part A and B schedule.
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