

Handout 9B

Summary of Key Schedule Changes

CWG Meeting
November 18, 2009

Groundwater Remedy

Significant Progress Made on Key Technical Documents

- **Groundwater CMS/FS Report**
 - √ Completed comments resolution: 10/16/09
 - √ PG&E submitted Redline Final CMS/FS: 11/13
 - Anticipate Agencies approval: 12/18
- **Groundwater Risk Assessment Report**
 - √ Agencies completed review of Redline GWRA: 10/28 and 11/5
 - √ PG&E submitted Revised GWRA: 11/13
 - Anticipate Agencies approval: 11/27
- **Groundwater Background Study Report**
 - √ DTSC completed review: 10/26
 - √ PG&E submitted Revised Report: 11/6
 - Anticipate Agencies approval: 11/16
- **Groundwater RFI/RI Volume 2 Addendum**
 - √ Agencies approved: 6/18 and 6/23

Groundwater Remedy

Forthcoming Remedy Selection/CEQA Documents for Stakeholders Inputs

- DTSC Statement of Basis
 - Public Notice Period: 4/27/2010 – 6/26/2010
- DOI Proposed Plan
 - Public Comment Period: 4/27 – 6/26
 - Section 106 Consultation: 4/27 – 7/3
- DTSC Draft Environmental Impact Report
 - Public Review/Comment Period: 4/27 – 6/26
 - Public Hearing: 5/12 – 6/11

Programmatic Agreement (PA)

Draft PA Schedule Added to the Project Schedule

- Target for completion prior to signing Record of Decision (ROD)
 - Draft PA schedule is under development
 - Meeting scheduled with Consulting Parties on 12/3/09 to review comments on Discussion Draft PA and discuss schedule

Key Soil Activities

(Remainder of 2009 through 1st quarter 2010)

- **Soil Part A (Outside Compressor Station)**
 - Part A Data Quality Objectives Technical Memorandum – target December 2009
 - Part A Phase 1 Data Gaps Evaluation – target submittal of data evaluation packages February 2010
- **Soil Part B (Inside Compressor Station Fence Line)**
 - √ PG&E submit schedule for Part B activities: 11/6/09
 - Work activities to finalize Part B Work Plan beginning Feb 2010

Handout 9B

Summary of Key Schedule Changes since August 15, 2007 (Version 7)

November 2009 changes highlighted in Yellow – changes are from May 15, 2009

Activities (Corresponding Line Items in Rainbow Schedule)	Forecast Schedule Deviation	Key Reasons
Groundwater Plume		
RFI/RI Volume 2 Addendum (Lines 581-604)	<ul style="list-style-type: none"> • Delay FS by 3 mos • Extend FF by 2+ months (from 12/16/08 to 3/11/09) (Rev. 2) • Extend FF from to 3/11/09 to 3/20/09 (Rev. 5). • Extend FF from 3/20 to 5/29/09 (Rev. 6). • Actual Finish 6/29/09 (Rev. 7). 	<ul style="list-style-type: none"> • Cascading delay from AZ Drilling. • 1+ month from cascading delay from AZ Drilling. • 1 month from correction of a link between lines 572-573 (agency review of addendum) and lines 576-577 (agency provides comments to PG&E). • Added line items in schedule for DTSC/DOI review of response to comments, extended FF by 2 weeks. • Added time for DTSC to review/provide direction to PG&E on Draft Vol 2 Addendum (FF 1/23/09, AF 2/5/09). • Added time for a redline version submitted to DTSC on April 30, 2009. • Added time for DTSC review/approval of the red-line and PG&E issuance of the Final Vol. 2 Addendum. • DTSC concurred with Final Redline Volume 2 Addendum on 6/23/09. • DOI concurred with Final Redline Volume 2 Addendum on 6/18/09. • Final Volume 2 Addendum published 6/29/09.
Groundwater Risk Evaluation (Lines 1088-1104)	<ul style="list-style-type: none"> • Extend FF from 1/6 to 4/10/09. • Extend FF from 4/10 to 4/22/09 (Rev. 4). • Extend FF from 4/22 to 5/11/09 (Rev. 5). • Extend FF from 5/11 to 7/31/09 (Rev. 6). • Extend FF from 7/31/09 to 11/27/09 (Rev. 7). 	<ul style="list-style-type: none"> • Cascading delay from Risk Assessment Work Plan. • Decrease duration of “Finalization of Risk Assessment” and “Agencies review/approval” by 1 week each (from 1 month to 3 wks). • PG&E requested to phase the submission of the groundwater risk assessment after RFI/RI approval to allow for any post-comments resolution changes in the RFI/RI Vol. 2 to be incorporated in the risk assessment. August 2008 scheduled the submittal of risk assessment before RFI/RI approval. Cascading delay in RFI/RI approval and submission after RFI/RI approval shifted FF by 5 weeks. • To make up time, reduce the duration for PG&E to address review comments/revise groundwater risk evaluation from 1 month to 3 weeks. • To make up time, reduce the duration of DTSC/DOI’s review/approval of the final groundwater risk evaluation from 3 to 2 weeks.

		<ul style="list-style-type: none"> • Cascading delay from RFI Volume 2. • Extend agencies review time from 3/20 to 4/3. • Extended duration for PG&E response to comments and comment resolution by 5 weeks (current FF is 5/29/09). • Added time for resolving inputs to response to comments and submittal of a revised report.
Groundwater Background Study (Line 922-946)	<ul style="list-style-type: none"> • Extend FF to match approval of GWRA (Rev. 6). • Extend FF to 11/16/09 (Rev. 7). 	<ul style="list-style-type: none"> • Revise FF for DTSC concurrence letter to coincide with approval of GWRA. • Receive direction to revise Final Report and submit for agencies approval 11/9/09.
CMS/FS - Groundwater (Lines 1122-1176)	<ul style="list-style-type: none"> • Delay FF from 10/1/09 to 12/3/09 (including agency approvals) (Rev. 2) • Extend FF from 12/3 to 1/6/10 (Rev. 3). • Schedule adjusted to reflect an earlier start of the CMS/FS, start mid August 2008 instead of April 2009 (Rev. 4). • Extend FF from 5/4 to 5/25/09 (Rev. 5). • Extend FF from 5/25 to 9/11/09 (3 months) (Rev. 6). • Extend FF from 9/11/09 to 12/18/09 (Rev. 7). 	<ul style="list-style-type: none"> • Cascading delay from RFI Vol. 2 Addendum. • Cascading delay from Risk Assessment Work Plan. • Two key adjustment in sequencing steps include (Rev. 4): <ul style="list-style-type: none"> – To be consistent with Tribal outreach for RFI/RI Volume 2 -- PG&E will outreach with Tribes after Discussion Draft CMS/FS is issued, and then issue Draft CMS/FS to agencies. – Replace the following process “Response to comments & revise report/ Agency review & comment on Revised Report/Finalize report/ Agency review & comment on Final Report” with the following “Reach resolution on response to comments/ Finalize report/ Agency review & approve Final Report.” • Cascading delay from the new linkage between Groundwater Risk Evaluation and the approval of the RFI/RI Volume 2, and delays from review of RFI Vol. 2. • Added Section 106 consultation, DOI meetings with Tribes, and BLM response to comments (2/5/09 - 5/26/09) • Added time for DOI to provide any additional comments on the Draft CMS/FS from meetings with Tribes (5days) • Added a link to phase the submission of the Final CMS/FS after the approval of the Groundwater Risk Assessment to allow for any post-comments resolution changes in the GWRA to be incorporated into the Final CMS/FS • Extended duration of “Reach Resolution on Response to Comments” (10 working days) due to extensive comments received. Added details and interim milestones for reaching resolutions on key assumptions (COCs, RAOs, CSM, ARARs, the number and configuration of remedial alternatives). • Agencies directed PG&E to include East Ravine into CMS/FS (6/2/09).

		<ul style="list-style-type: none"> • PG&E proposed Revised Alternative E in response to comments. • PG&E presented East Ravine information/Revised Alt. E at 9/28 TWG. • Received stakeholders' comments on Revised Alt. E (10/5/09). • Received input from RWQCB on reasonable time to cleanup (10/6/09). • Added two "Response to Comments Resolution" meetings (9/22 and 10/13-14) to accelerate resolution. Completed comments resolution 10/16/09.
<p>Remedy Selection/ Statement of Basis</p> <p>(Lines 1199-1205)</p>	<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). 	<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.
<p>NOP and Scoping/ Program EIR</p> <p>(Lines 1267-1316)</p>	<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). 	<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.
<p>Proposed Plan/ROD</p>	<ul style="list-style-type: none"> • Delay FF from 4/15/10 to 6/17/10 (Rev. 2) 	<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"

<p>(Lines 1214-1225)</p>	<ul style="list-style-type: none"> 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). 	<p>(Section 106) followed by SHPO Consultation (Section 106)".</p> <ul style="list-style-type: none"> 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 45days to 60days). 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 90days. Cascading delay from CMS/FS. Align timeframe for public comment of Proposed Plan and Statement of Basis/Draft EIR.
<p>NEW - Section 106 Programmatic Agreement (Lines 1237-1246)</p>	<ul style="list-style-type: none"> FF 9/15/2010 (Rev. 7). 	<ul style="list-style-type: none"> The Draft PA schedule is under development and is subject to change pending discussion with Consulting Parties.
<p>CMI/RD/RA/ Construction/Start of Operation of Final Remedy (Lines 1332-End)</p>	<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.
<p>Soil</p>		
<p>RFI/RI Volume 1 Addendum (Lines 281-304)</p>	<p>Forecast duration of 7.5 months, linked to RFI Vol. 3 report (target to complete 3 months prior to start of Vol. 3).</p>	<p>To incorporate MW-20 bench and IM3 Treatment Plant as potential AOCs.</p> <ul style="list-style-type: none"> Reflect revised Part A and B schedule.
<p>Part A Phase 1 field implementation/ data gaps evaluation (Lines 674-748)</p>	<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). 	<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.

	<ul style="list-style-type: none"> • Extend FF from 4/30 to 11/5/09 (Rev. 6). • Extend FF from 11/5/09 to 6/9/10 (Rev. 7). 	<ul style="list-style-type: none"> • 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.
<p>Part B Draft/Final Work Plan/ Approvals/ Implementation (Lines 782-856)</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 11/1/2011 (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.

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RFI/RI Vol. 3/Risk Assessment-Soil/CMS/FS-Soil (CMS/FS Lines 1177-1197)	<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 10/30/2013 (Rev. 7). 	<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.
Public Notice/Statement of Basis/Supplemental EIR (Lines 1319-1329)	<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 5/1/2014 (Rev. 7). 	<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.
Proposed Plan/ROD (Lines 1226-1236)	<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 9/1/2014 (Rev. 7). 	<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.
East Ravine Groundwater Investigation		
Workplan/Permitting Field Implementation	<ul style="list-style-type: none"> 13 month forecast duration, not linked to any RFI reports Extend overall FF by 3 months (Rev. 2) 	<ul style="list-style-type: none"> No step out wells will be required (if needed, will add a time to schedule). One workplan, one response to comments on workplan, obtain approval to implement in 2 mos. Extended agency review/comment period (FF 12/28/07, AF 1/8/08)

<p>Reporting (Lines 512-549)</p>	<ul style="list-style-type: none"> • Extend FF by additional 4 months (Rev. 3) • Reduce FF by about 1 month (Rev. 4). • Extend FF from 6/19 to 8/10/09 (Rev. 5). • Extend FF from 8/10 to 12/15/09 (Rev. 6). • For schedule, see Groundwater CMS/FS (Rev. 7). 	<ul style="list-style-type: none"> • Extended receipt of DOI's comment on Response to Comments/ direction to finalize Work Plan from FF 4/30 to AF 6/9/08 • Addition of a Revised Work Plan (AF 7/11/08) • For consistency with other field programs that have been successfully implemented, add 1 month after securing all approvals/ permits to allow for adequate time for proper field mobilization/ health and safety. • Agency approval of Revised Workplan 7/24/08. Submitted request for approval to implement the Workplan 8/4/08. • Adjust duration of field work to match Revised Workplan (from 3.9 months to 14 weeks). • Extend FF for DOI approval to implement the Revised Work Plan from 10/24 to 11/10/08 (due to delay in start of SHPO consultation, forecast start was 9/12, actual start was 9/22/08). • Due to holiday resources constraint (the preferred/experienced driller does not work over the Christmas holidays), the site kick-off meeting is tentatively scheduled for January 13, 2009 instead of mid-December 2008. • Extend duration of field work per detailed field schedule (discussed during Jan 7 RCRA/CERCLA mtg) from 14 to 16.3 weeks. Add data analysis and validation step after field work (4 weeks). • With the exception of Site E Alternate 1, drill at all primary and contingency well locations, 2 sampling events (1 month apart), retrofit MW-23, all results will be incorporated into a single report. • June 2009 - Decision made to include the East Ravine Investigation Report as an appendix to the Groundwater CMS/FS. The East Ravine Investigation Report was submitted to agencies for preview on 10/19/09.
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