

Handout 6B
Schedule Highlights
Summary of Key Schedule Changes

CWG Meeting
March 17, 2010

Schedule Highlights

Groundwater Remedy

Agencies Approved Key Technical Documents

- Groundwater CMS/FS Report
 - √ DOI approval: 12/17/09
 - √ DTSC approval: 12/18/09
- Groundwater Risk Assessment Report
 - √ DTSC approval: 12/10/09
 - √ DOI approval: 12/15/09
- Groundwater Background Study Report
 - √ DTSC approval: 11/16/09
 - √ DOI approval: 12/02/09

Forecast of Key Documents

Statement of Basis/DEIR/Proposed Plan/PA

- DTSC Statement of Basis
 - Public Notice Period: 06/04 – 7/19/2010
- DTSC Draft Environmental Impact Report
 - Advanced Draft EIR to Tribes/TLP – 04/27
 - Public Review/Comment Period: 06/04 – 07/19
- DOI Proposed Plan
 - Section 106 Consultation: 03/12 - 06/14
 - Public Comment Period: 06/04 – 07/19
- Programmatic Agreement
 - Draft Agreement Document – target 5/15/10
 - PA Complete – target 9/15/10

Forecast of Key Document

East Ravine Work Plan Addendum

- Work Plan Addendum – East Ravine Phase 2/
Compressor Station Wells
 - 3/16/10 - Presented/discussed process with TWG
 - Additional TWG discussion in April – Target 2nd week
 - Early June (target 6/15/10) - Work plan addendum to Stakeholders/Tribes for review
 - Start Section 106 consultation
 - Start stakeholders review period - 30 calendar days

Key Soil Activities

(January - July 2010)

- **Soil Part A (Outside Compressor Station)**
 - Target 3/15/10 – Send Part A Data Quality Objectives (DQO) Technical Memorandum to TWG/CWG
 - 3/16/10 – Present Part A DQO Steps 1-5 to TWG
 - Target June - Meeting with Stakeholders/Tribes to discuss DQO Steps 6-7
 - July 2010 - Send data gaps evaluation packages to CWG/TWG
 - Review period – 4 weeks

Key Soil Activities

(January – July 2010)

- **Soil Part B (Inside Compressor Station)**
 - 3/10/10 – Agencies provided direction on conflicting comments (Draft Part B Work Plan)
 - April 2010 – PG&E finalizes/submits response to comments (include DQO)
 - Mid April to mid May 2010 – Agencies review response to comments
 - May 2010 – Comments resolution
 - June 2010 – PG&E starts to finalize Part B Work Plan

Summary of Key Schedule Changes

Handout 6B

Summary of Key Schedule Changes since August 15, 2007 (Version 8)

March 2010 changes highlighted in Yellow – changes are from November 18, 2009

Activities <small>(Corresponding Line Items in Rainbow Schedule)</small>	Forecast Schedule Deviation	Key Reasons
Groundwater Plume		
NEW - East Ravine Groundwater Investigation Phase 2/ Compressor Station Wells Work Plan Addendum and Approvals (Lines 548-565)	<ul style="list-style-type: none"> • FF 10/13/10 (Rev. 8). 	<ul style="list-style-type: none"> • N/A
Groundwater Risk Evaluation (Lines 1107-1123)	<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). • AF 12/10/09 (DTSC), 12/15/09 (DOI) (Rev. 8). 	<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. • 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	<ul style="list-style-type: none"> • Extend FF to match approval 	<ul style="list-style-type: none"> • Revise FF for DTSC concurrence letter to coincide with approval of GWRA.

<p>Study (Line 941-965)</p>	<p>of GWRA (Rev. 6).</p> <ul style="list-style-type: none"> • Extend FF to 11/16/09 (Rev. 7). • AF 11/16/09 (DTSC), 12/2/09 (DOI) (Rev. 8). 	<ul style="list-style-type: none"> • Receive direction to revise Final Report and submit for agencies approval 11/9/09.
<p>CMS/FS - Groundwater (Lines 1140-1198)</p>	<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). • AF 12/17/09 (DOI), 12/18/09 (DTSC) (Rev. 8). 	<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). • 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 1218-1224)</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). • Extend FF from 10/18 to 11/8/2010 (Rev. 8). 	<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.
<p>NOP and Scoping/ Program EIR</p> <p>(Lines 1297-1413)</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). • 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.
<p>Proposed Plan/ROD</p> <p>(Lines 1221-1232)</p>	<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 	<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

	<p>the change in CMS/FS schedule. ROD issuance date is 12/5/2009 (Rev. 4).</p> <ul style="list-style-type: none"> • 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>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.</p> <ul style="list-style-type: none"> • 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. • 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.
<p>Section 106 Programmatic Agreement (Lines 1256-1276)</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 1362-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. • 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).
<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 612-764)</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). • Extend FF from 4/30 to 	<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

	<p>11/5/09 (Rev. 6).</p> <ul style="list-style-type: none"> • Extend FF from 11/5/09 to 6/9/10 (Rev. 7). • Extend FF from 6/9/10 to 11/25/10 (Rev. 8). 	<p>organic COPECs.</p> <ul style="list-style-type: none"> • 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. • Added time for agency review of Draft Part A DQO Tech Memo. • Added time for PG&E to revise Part A DQO Tech Memo. • Adjusted schedule to reflect State of CA furlough ending 6/1/2010. • Added time to prepare/submit Data Gaps Evaluation info packages (DQO steps 6-7), and time for meeting to discuss with Tribes/Stakeholders.
<p>Part B Draft/Final Work Plan/ Approvals (Lines 801-855)</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 	<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

	<p>9/30/08. In agencies review (Rev. 5). Part B is on hold until agencies complete this review (Rev. 6).</p> <ul style="list-style-type: none"> • Extend FF to 12/1/2011 (Rev. 7). • Reduce FF to 11/04/2011 (Rev. 8). 	<p>Part B Work Plan.</p> <ul style="list-style-type: none"> • 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.
<p>RFI/RI Vol. 3/Risk Assessment-Soil/CMS/FS-Soil (CMS/FS Lines 1199-1216)</p>	<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). 	<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.
<p>Public Notice/Statement of Basis/Supplemental EIR (Lines 1349-1359)</p>	<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). 	<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 1245-1255)</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. 	<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.

	<ul style="list-style-type: none">• 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).	
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