

## Summary of Key Schedule Changes since August 15, 2007 (Rev. 6)

May 2009 changes highlighted in Yellow – changes are from November 18, 2008

Activities <small>(Corresponding Line Items in Rainbow Schedule)</small>	Forecast Schedule Deviation	Key Reasons
<b>General</b>		
Final CMS/FS Work Plan	<ul style="list-style-type: none"> <li>• Start as scheduled, extend Forecast Finish (FF) by 3 mos.</li> <li>• Extend FF by approx. 2.5 months (Rev. 2).</li> <li>• Extend FF by 1.5 months (Rev. 3).</li> <li>• Complete - DOI approval received 6/24/08 (Rev. 4).</li> </ul>	<ul style="list-style-type: none"> <li>• Addition of one round of Work Plan revision</li> <li>• Extended agency review/comment (FF 12/7/07, AF 1/24/08)</li> <li>• Extended agency review/approval (April FF 4/18/08, June FF 6/13/08, Actual Finish 6/24/08)</li> </ul>
Risk Assessment Work Plan (Soil/Groundwater)  (Lines 1024-1049)	<ul style="list-style-type: none"> <li>• Extend FF from 5/9 to 8/4/08 (Rev. 3).</li> <li>• Extend FF from 8/4 to 9/9/08 (Rev. 4).</li> <li>• Extend FF from 9/9/08 to 1/14/09 (Rev. 5).</li> <li>• Actual Finish 2/5/09 (FF 1/14/09).</li> </ul>	<ul style="list-style-type: none"> <li>• Addition of Response to Comments and review/concurrence of Response to Comments.</li> <li>• Extended agency review/comment on response to comments on Revised Risk Assessment Work Plan.</li> <li>• Received DTSC's directive to proceed with Groundwater RA on 10/17/08.</li> <li>• Extend FF to reflect addition of a Final Revised Work Plan to address remaining risk assessment issues related to soils (FF for submitting Final Work Plan to agencies is 12/31/08).</li> <li>• Received DTSC's approval on 2/4, DOI's approval on 2/5.</li> </ul>
<b>Groundwater Plume</b>		
RFI/RI Volume 2  (Lines 558-578)	<ul style="list-style-type: none"> <li>• Delay start by 1 mo, extend FF by 3.5 mos.</li> <li>• Extend FF 12/15/08 to 12/30/08 (Rev. 5).</li> <li>• Actual Finish 2/9/09 (FF 12/30/08).</li> </ul>	<ul style="list-style-type: none"> <li>• Delay start by 1 month due to delay of agency direction on response to comments.</li> <li>• Extend FF for 2.5 months due to issues on application of Background Study values (day for day delay after Nov 1, receipt of DTSC direction on 11/30/07, recalculate values/submit report by January 14, 2008).</li> <li>• Extend FF for 2+ weeks to reflect extended agencies review/comment on RFI/RI Volume 2.</li> <li>• Received DTSC's approval on 2/4/09, DOI's approval on 2/9/09.</li> </ul>
AZ Drilling	<ul style="list-style-type: none"> <li>• Delay FS by 2.5 mos, extend</li> </ul>	<ul style="list-style-type: none"> <li>• As of mid Nov, the driller (Prosonic) is booked until end of Jan. Schedule</li> </ul>

<p>(field/reporting) (Lines 423-444)</p>	<p>FF by about 3 mos.</p> <ul style="list-style-type: none"> <li>Extend FF by 1+ month (from 7/1 to mid-Aug) (Rev. 2).</li> <li>Extend FF to reflect ADEQ's evaluation of path forward under the AZ Voluntary Remediation Program.</li> </ul>	<p>was changed to reflect a KO mtg on 1/15/08, and start equip mob to site on 1/24/08.</p> <ul style="list-style-type: none"> <li>KO mtg is 3/10/08, start of drilling 3/11/08.</li> <li>Based on input from ADEQ in May, PG&amp;E will be preparing a No Further Action Request after completion of 6 monthly sampling events.</li> <li>As of October 2008, PG&amp;E completed six rounds of monthly sampling per ADEQ's conditional approval and proposed to incorporate AZ wells into the groundwater monitoring sampling program (quarterly sampling). ADEQ is in the process of evaluation path forward under the AZ Voluntary Remediation Program.</li> </ul>
<p>RFI/RI Volume 2 Addendum (Lines 579-599)</p>	<ul style="list-style-type: none"> <li>Delay FS by 3 mos</li> <li>Extend FF by 2+ months (from 12/16/08 to 3/11/09) (Rev. 2)</li> <li>Extend FF from to 3/11/09 to 3/20/09 (Rev. 5).</li> <li>Extend FF from 3/20 to 5/29/09 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>Cascading delay from AZ Drilling.</li> <li>1+ month from cascading delay from AZ Drilling.</li> <li>1 month from correction of a link between lines 572-573 (agency review of addendum) and lines 576-577 (agency provides comments to PG&amp;E).</li> <li>Added line items in schedule for DTSC/DOI review of response to comments, extended FF by 2 weeks.</li> <li>Added time for DTSC to review/provide direction to PG&amp;E on Draft Vol 2 Addendum (FF 1/23/09, AF 2/5/09).</li> <li>Added time for a redline version submitted to DTSC on April 30, 2009.</li> <li>Added time for DTSC review/approval of the red-line and PG&amp;E issuance of the Final Vol. 2 Addendum.</li> </ul>
<p>Groundwater Risk Evaluation (Lines 1050-1063)</p>	<ul style="list-style-type: none"> <li>Extend FF from 1/6 to 4/10/09.</li> <li>Extend FF from 4/10 to 4/22/09 (Rev. 4).</li> <li>Extend FF from 4/22 to 5/11/09 (Rev. 5).</li> <li>Extend FF from 5/11 to 7/31/09 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>Cascading delay from Risk Assessment Work Plan.</li> <li>Decrease duration of "Finalization of Risk Assessment" and "Agencies review/approval" by 1 week each (from 1 month to 3 wks).</li> <li>PG&amp;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.</li> <li>To make up time, reduce the duration for PG&amp;E to address review comments/revise groundwater risk evaluation from 1 month to 3 weeks.</li> <li>To make up time, reduce the duration of DTSC/DOI's review/approval of the final groundwater risk evaluation from 3 to 2 weeks.</li> <li>Cascading delay from RFI Volume 2.</li> <li>Extend agencies review time from 3/20 to 4/3.</li> <li>Extended duration for PG&amp;E response to comments and comment resolution by 5 weeks (current FF is 5/29/09)</li> </ul>

<p>Revised Groundwater Modeling (Lines 989-991)</p>	<ul style="list-style-type: none"> <li>• Delay Forecast Start (FS) by 5 mos, extend FF by 5 mos.</li> <li>• Extend FF by 2 months (Rev. 2).</li> <li>• Revised schedule to reflect the August 18, 2008 TWG discussion (Rev. 5).</li> </ul>	<ul style="list-style-type: none"> <li>• Due to delays in hydraulic testing and AZ drilling.</li> <li>• Cascading delay from AZ drilling.</li> <li>• Based on the August 18, 2008 TWG meeting, the 5-layer model will be updated to support the alternatives evaluation in the Groundwater CMS/FS. Revision of the 10-layer model may be conducted resulting from review of 5 layer model or for remedial design.</li> </ul>
<p>Flood Plain ISPT (Lines 934-954)</p>	<ul style="list-style-type: none"> <li>• Start as scheduled, extend FF by 6 mos.</li> <li>• Extend FF by 1 month.</li> <li>• Extend through March 2009 (Rev. 4).</li> <li>• Extend through December 2009 (Rev. 5).</li> </ul>	<ul style="list-style-type: none"> <li>• The extension was due to the addition of a post completion monitoring period of 6 mos. Extend post completion monitoring period to December 2009.</li> <li>• Final report submitted on 3/5/08 (instead of 1/31/08). Not on critical path.</li> </ul>
<p>Upland ISPT (Lines 977-987)</p>	<ul style="list-style-type: none"> <li>• Start as scheduled, extend FF by 3.5 mos.</li> <li>• Extend 2 months to March 2009 (Rev. 4).</li> <li>• Extend through December 2009 (Rev. 5).</li> </ul>	<ul style="list-style-type: none"> <li>• Due to permitting issue related to the ethanol tank. Received permit for ethanol tank on December 5, 2007.</li> <li>• Extend pilot study by 2 months due to stop of dosing for 2 months.</li> <li>• Add 1-year post completion monitoring period.</li> </ul>
<p>Groundwater Background Study (Line 907)</p>	<ul style="list-style-type: none"> <li>• Extend FF to match approval of GWRA</li> </ul>	<ul style="list-style-type: none"> <li>• Revise FF for DTSC concurrence letter to coincide with approval of GWRA.</li> </ul>
<p>CMS/FS - Groundwater (Lines 1080-1105)</p>	<ul style="list-style-type: none"> <li>• Delay FF from 10/1/09 to 12/3/09 (including agency approvals) (Rev. 2)</li> <li>• Extend FF from 12/3 to 1/6/10 (Rev. 3).</li> <li>• Schedule adjusted to reflect an earlier start of the CMS/FS, start mid August 2008 instead of April 2009 (Rev. 4).</li> <li>• Extend FF from 5/4 to 5/25/09 (Rev. 5).</li> <li>• Extend FF from 5/25 to 9/11/09 (3 months) (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• Cascading delay from RFI Vol. 2 Addendum.</li> <li>• Cascading delay from Risk Assessment Work Plan.</li> <li>• Two key adjustment in sequencing steps include (Rev. 4): <ul style="list-style-type: none"> <li>– To be consistent with Tribal outreach for RFI/RI Volume 2 -- PG&amp;E will outreach with Tribes after Discussion Draft CMS/FS is issued, and then issue Draft CMS/FS to agencies.</li> <li>– Replace the following process "Response to comments &amp; revise report/ Agency review &amp; comment on Revised Report/Finalize report/ Agency review &amp; comment on Final Report" with the following "Reach resolution on response to comments/ Finalize report/ Agency review &amp; approve Final Report."</li> </ul> </li> <li>• 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.</li> </ul>

		<ul style="list-style-type: none"> <li>• Added Section 106 consultation, DOI meetings with Tribes, and BLM response to comments (2/5/09 - 5/26/09)</li> <li>• Added time for DOI to provide any additional comments on the Draft CMS/FS from meetings with Tribes (5days)</li> <li>• 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</li> <li>• 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).</li> </ul>
<p>Remedy Selection/ Statement of Basis (Lines 1128-1134)</p>	<ul style="list-style-type: none"> <li>• DTSC approval of Final Remedy - delay FF from 2/14/2010 to 8/27/2010 (6 mos) (Rev. 3).</li> <li>• Schedule adjusted to reflect the change in CMS/FS schedule. DTSC approval of Final Remedy is 1/22/2010 (Rev. 4).</li> <li>• Extend FF from 1/22 to 2/12/2010 (Rev. 5).</li> <li>• Extend FF from 2/12 to 6/15/2010 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• Public notice package delay due to cascading delay from CMS/FS Groundwater.</li> <li>• 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.</li> <li>• Cascading delay from CMS/FS (due to delay in RA).</li> <li>• Cascading delay from Groundwater CMS/FS.</li> <li>• Extended public comment/public notice for Statement of Basis from 60 to 75 edays due to end of year holiday timeframe.</li> </ul>
<p>NOP and Scoping/ Program EIR (Lines 1197-1229)</p>	<ul style="list-style-type: none"> <li>• Extend NOD from 4/20/2009 to 8/27/2010.</li> <li>• Extend NOD filing date to 9/28/2010.</li> <li>• Schedule adjusted to reflect the change in CMS/FS schedule. NOD filing date is 1/22/2010 (Rev. 4).</li> <li>• Extend FF from 1/22 to 2/12/2010 (Rev. 5).</li> <li>• Extend FF from 2/12 to 6/15/2010 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Change selected links between tasks for Draft EIR - does not impact completion dates.</li> <li>• Cascading delay from Approval of Final Remedy.</li> <li>• Extended public comment/public notice for Draft EIR from 60 to 75 edays due to end of year holiday timeframe.</li> </ul>

<p>Proposed Plan/ROD (Lines 1143-1154)</p>	<ul style="list-style-type: none"> <li>• Delay FF from 4/15/10 to 6/17/10 (Rev. 2)</li> <li>• Extend FF from 6/17 to 7/21/2010.</li> <li>• Schedule adjusted to reflect the change in CMS/FS schedule. ROD issuance date is 12/5/2009 (Rev. 4).</li> <li>• Extend FF from 12/5 to 1/25/2010 (Rev. 5).</li> <li>• Extend FF from 1/25/2010 to 6/16/2010 (4+ months) (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• Cascading delay from CMS/FS (due to delay in RA).</li> <li>• Revise the “Tribal review/comment period” step to “Tribal Consultation (Section 106) followed by SHPO Consultation (Section 106)”.</li> <li>• Cascading delay from Groundwater CMS/FS.</li> <li>• 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.</li> <li>• Increased the duration of DOI Approval Process for ROD from 60 to 90edays.</li> <li>• Cascading delay from CMS/FS.</li> </ul>
<p>CMI/RD/RA/ Construction/Start of Operation of Final Remedy (Lines 1245-1280)</p>	<ul style="list-style-type: none"> <li>• Delay FF by 6 mos (from 11/24/11 to 5/7/12)</li> <li>• Schedule adjusted to reflect the change in CMS/FS schedule</li> </ul>	<ul style="list-style-type: none"> <li>• Cascading delay from Program EIR and DTSC approval of Final Remedy.</li> <li>• Cascading delay from CMS/FS (due to delay in RA).</li> <li>• Cascading delay from Groundwater CMS/FS.</li> </ul>
<p><b>Soil</b></p>		
<p>RFI/RI Volume 1 Addendum (Lines 281-304)</p>	<p>Forecast duration of 7.5 months, linked to RFI Vol. 3 report (complete 3 months prior to start of Vol. 3).</p>	<p>To incorporate MW-20 bench and IM3 Treatment Plant as potential AOCs.</p>
<p>Part A Phase 1 field implementation/data gaps evaluation (Lines 669-733)</p>	<ul style="list-style-type: none"> <li>• Extend FF from 7/31/08 to 9/15/09 (Rev. 1)</li> <li>• Extend FF from 9/15/08 to 11/24/08 (Rev. 2)</li> <li>• Extend FF to 3/11/09 (Rev. 3).</li> <li>• Extend FF from 3/11/09 to 4/30/09 (Rev. 5).</li> <li>• Extend FF from 4/30 to 9/29/09 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• Site kick-off meeting – August 21, 2008.</li> <li>• Add DTSC/DOI review/concurrence on the approach in the Soil Background Technical Memorandum (duration of 2 weeks).</li> <li>• 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.</li> <li>• Added details for TM#4 – agency review/approvals of screening values for organic COPECs.</li> <li>• Added Tribal review/comment of Soil Background TM.</li> <li>• Extend FF for TM#4 from 1/9 to 1/19/09 and add DQO documentation</li> </ul>

		<p>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).</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>
<p>Part B investigation (Lines 768-790)</p>	<ul style="list-style-type: none"> <li>• Extend FF by 1.5 mos.</li> <li>• Extend FF by 2 weeks</li> <li>• Submitted Response to Comments on 5/5/08.</li> <li>• Submitted letter on Part B phasing on 7/17/08. In agencies review (Rev. 4).</li> <li>• PG&amp;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.</li> </ul>	<ul style="list-style-type: none"> <li>• 1 month due to DQO discussion and past data evaluation.</li> <li>• 0.5 month due to incorporation of perimeter sampling walk/ verification.</li> <li>• Additional time for agency review of Part B Work Plan.</li> </ul>
<p>RFI/RI Vol. 3/Risk Assessment-Soil/CMS/FS-Soil (CMS/FS Lines 1106-1126)</p>	<ul style="list-style-type: none"> <li>• Extend FF for CMS/FS from 11/10/11 to 2/21/12 (Rev. 2)</li> <li>• Extend FF for CMS/FS from 2/21/12 to 7/3/2012 (Rev. 3).</li> <li>• Extend FF from 7/3 to 8/21/2012 (Rev. 5).</li> <li>• Extend FF from 8/12 to 2/15/2013 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• Approx. 2 months due to cascading delay from Part A Phase 1 workplan/ approval/permitting.</li> <li>• 1 month from adding a link between tribal review of CMS/FS and PG&amp;E response to comments.</li> <li>• Cascading delay from Part A approval.</li> <li>• Cascading delay from Part A Phase 1 data gaps evaluation.</li> <li>• Revise the Soil CMS/FS steps to mirror the Groundwater CMS/FS steps <ul style="list-style-type: none"> <li>• E.g., discussion draft, draft, resolution to comments, final.</li> <li>• Use the duration of the Groundwater CMS/FS steps as placeholders.</li> <li>• Keep the sequential order of RFI/RI and Risk before CMS/FS.</li> </ul> </li> </ul>
<p>Public Notice/Statement of Basis/Supplemental EIR (Lines 1240-1250)</p>	<ul style="list-style-type: none"> <li>• Extend NOD from 12/13/2011 to 7/27/2012</li> <li>• Extend NOD from 7/27/12 to 12/7/2012 (Rev. 3).</li> <li>• Extend NOD from 12/7 to 1/25/2013 (Rev. 5).</li> <li>• Extend NOD from 1/25 to 7/22/2013 (Rev. 6)</li> </ul>	<ul style="list-style-type: none"> <li>• Cascading delay from CMS/FS Soil</li> <li>• 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.</li> <li>• Cascading delay from CMS/FS Soil.</li> </ul>
<p>Proposed Plan/ROD</p>	<ul style="list-style-type: none"> <li>• Extend FF from 5/26/2012 to 9/6/2012</li> </ul>	<ul style="list-style-type: none"> <li>• Cascading delay from CMS/FS Soil.</li> <li>• Increased the duration of DOI Approval Process for ROD from 60 to</li> </ul>

(Lines 1155-1165)	<ul style="list-style-type: none"> <li>• Extend FF from 9/6 to 1/17/2013.</li> <li>• Extend FF from 1/17 (Rev. 4) to 3/7/2013 (Rev. 5).</li> <li>• Extend FF from 3/7 to 11/20/2013 (Rev. 6).</li> </ul>	90edays.
<b>East Ravine Groundwater Investigation (not linked to Groundwater Plume or Soil)</b>		
<p>Workplan/Permitting</p> <p>Field Implementation</p> <p>Reporting</p> <p>(Lines 539-557)</p>	<ul style="list-style-type: none"> <li>• 13 month forecast duration, not linked to any RFI reports</li> <li>• Extend overall FF by 3 months (Rev. 2)</li> <li>• Extend FF by additional 4 months (Rev. 3)</li> <li>• Reduce FF by about 1 month (Rev. 4).</li> <li>• Extend FF from 6/19 to 8/10/09 (Rev. 5).</li> <li>• Extend FF from 8/10 to 12/15/09 (Rev. 6).</li> </ul>	<ul style="list-style-type: none"> <li>• No step out wells will be required (if needed, will add a time to schedule).</li> <li>• One workplan, one response to comments on workplan, obtain approval to implement in 2 mos.</li> <li>• Extended agency review/comment period (FF 12/28/07, AF 1/8/08)</li> <li>• Extended receipt of DOI's comment on Response to Comments/direction to finalize Work Plan from FF 4/30 to AF 6/9/08</li> <li>• Addition of a Revised Work Plan (AF 7/11/08)</li> <li>• 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.</li> <li>• Agency approval of Revised Workplan 7/24/08. Submitted request for approval to implement the Workplan 8/4/08.</li> <li>• Adjust duration of field work to match Revised Workplan (from 3.9 months to 14 weeks).</li> <li>• 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).</li> <li>• 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.</li> <li>• 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).</li> <li>• 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.</li> </ul>