

Handout 12B

Schedule Highlights

Summary of Key Schedule Changes

Consultative Work Group Meeting
March 5, 2025

Schedule Highlights

Text in “red font” represents updates from last CWG (Dec 4, 2024)

Phase 2A Groundwater Remedy Construction

TCS Recirculation Loop*, Riverbank Wells, Freshwater Injection Well (FW-2) and Associated Arsenic Monitoring Wells, Pipelines (Inside/Outside of TCS)

- Phase 2A Construction and Startup – 3/7/22 to 5/28/26
 - Mobilization – 2/14 to 3/7/22
 - Pilot Borehole/Well Installation/Well Buildout – 3/8/22 to 5/28/26
 - Assumes a decision is made on FW-2B and associated arsenic MWs by February 2026
 - Resume construction of Pipeline C18 in East Ravine – Mid Aug to End of Nov 2025
 - FW-2B Pipeline Construction – Combine with Phase 2B pipeline construction
 - Phase 2A Startup – Combine with Phase 2B for complete remedy startup
- On August 15, 2023, PG&E informed DTSC and DOI that PG&E intends to extend the construction pause until receipt of further direction on the proposed Phase 2B design modification submitted to the agencies Dec 2022.
 - See page 6 of this PDF for agencies' decision on proposed Phased 2B design modification

** The TCS Recirculation Loop consists of injection wells in TCS, extraction wells at the Transwestern Bench, extraction wells in the East Ravine (along historic Route 66), and associated pipelines.*

Phase 2B Groundwater Remedy Construction

Inner Recirculation Loop* (IRL) Wells, Freshwater Injection Well FW-1, Upland Monitoring Wells, Pipelines (Inside/Outside TCS), AZ Facilities to Convey Water from Freshwater Supply Well (HNWR-1A) to California

- Project Initiation Meeting – 3/4/25
- Well* Drilling/Installation/Development (include site preparation and access roads improvement/ maintenance) – 3/18/25 to October 2026
 - *Include Freshwater Injection well FW-1, IRL wells IRL-1/2/3/4, Monitoring Wells MW-I/J/P/Q, and Arsenic MWs MW-AA/BB/CC/DD/FF/GG)*
- Pipeline** and Remaining Supporting Facilities Installation – October 2025 to October 2028
 - **Include pipelines in the upland/Bat Cave Wash/floodplain, and freshwater pipeline from AZ to CA*
- Complete System Integration/Functional Testing – Nov 2028 to Jan 2029
- Completed System Start-Up/Start of O&M – Jan 2029

** Per 2015 BOD, the Inner Recirculation Loop consists of IRL wells in the uplands and Riverbank (RB) wells along the riverbank. RB wells (RB-2 through RB-5) were installed in Phase 2A. All IRL wells are planned for Phase 2B.*

*** Pipeline connecting FW-2B is combined with Phase 2B pipelines.*

Proposed Phase 2B Design Modification (2022)

- PG&E submitted proposal to DTSC/DOI – 12/2/22
- Comments received by PG&E* on the proposal from:
 - FMIT – 1/5 and 4/25/23, 1/5 and 1/12/24
 - Quechan Indian Tribe provided concurrence with FMIT comments
 - Tribes/TRC - 3/8 and 4/25/23
 - DTSC - 5/1/23 and 4/23/24
 - DOI - 5/5/23
- Section 106 Comments Letters – 3/7 and 5/23/24
- Response to Comments* (RTCs), Site Visits/Meetings*
 - PG&E provided RTC tables – 5/1, 5/10, 5/29, and 8/30/24 (final)
 - Site visits – 5/11/23, 2/8 and 3/18/24
 - Clarification meeting – 4/15/24
 - Meetings to discuss comments/RTCs – 6/11, 6/13, 6/24, and 7/15/24
 - Responses to the final RTC table – 10/31/24

* Excludes Section 106 government to government communications

Proposed Phase 2B Design Modification (2022, Continued)

- Section 106 consultation on the proposal – **concluded**
- Agencies' decision on proposed modification
 - On 10/31/24, DTSC with agreement from DOI rejected the 2022 proposed modification
- On 11/8/24, PG&E requested the agencies to reconsider the 10/31/24 decision.
- On 2/13/25, DTSC replied to PG&E's 11/8/24 request. After review of the request and conferring with DOI, DTSC declined to change its 10/31/24 decision.

Soil Risk Assessment (RA) Addendum

- Soil Risk Assessment Addendum Timeline
 - Prepare/submit RA Addendum: December 13, 2024
 - Tribes/Stakeholders review/comment: 73 calendar days (December 16, 2024 to February 28, 2025)
 - Agencies review/comment: 88 calendar days (December 16, 2024 to March 14, 2025)
 - Review RTCs/comment resolution: Forecast mid March – end of June 2025
 - Finalize/submit RA Addendum: Forecast late August 2025
 - Agencies' Approval: Forecast September 2025
- Results of the approved Soil RA Addendum will be incorporated into the Soil Corrective Measure Study/Feasibility Study

Soil Corrective Measure Study/Feasibility Study (CMS/FS)

- Prepare/submit draft CMS/FS: **Forecast September 2025 - July 2026**
 - Tribes/Stakeholders review/comment: 60 calendar days
 - Agencies review/comment: 75 calendar days
- Prepare RTCs/Comment Discussion: **Forecast September 2026 – January 2027**
- Finalize/submit final CMS/FS: **Forecast January - April 2027**
- Agencies' Concurrence: **Forecast May 2027**

Soil Remedy Decision (Statement of Basis/Record of Decision)

- DTSC's Statement of Basis/Adoption of Remedy* – Forecast Q3 2027
- DOI's Record of Decision* – Forecast Q1 2028

** Agencies' decision documents and CEQA evaluation are placeholder items only. Details will be provided after the Soil CMS/FS is better defined.*

Former Impoundment Area Investigation

- PG&E submitted workplan– September 6, 2024
- DTSC reviewed/provided comments – December 12, 2024
- PG&E prepared/submitted RTC table to DTSC – January 24, 2025
- DTSC is reviewing RTC table

PFAS Soil and Groundwater Investigative Order

- RWQCB issued Investigative Order R7-2024-040 - December 9, 2024
- PG&E is preparing a workplan – due to RWQCB March 31, 2025

Summary of Schedule Changes

Handout 12B

Summary of Key Schedule Changes since August 15, 2007 (Rev. 55)

Yellow highlights are changes since **December 4, 2024** CWG

Activities	Forecast Schedule Deviation	Key Reasons
Groundwater Remedy Construction		
Phase 2A Construction (Lines 1819-1828)	FF for completion of Phase 2A construction <ul style="list-style-type: none"> 4/27/2023 (Rev. 48, 49, 50) 5/30/2023 (Rev. 51) 4/24/2024 (Rev. 52) 7/1/2024 (Rev. 53) 9/30/2025 (Rev. 54) 12/31/2026 (Rev. 55) 	<ul style="list-style-type: none"> Time extension reflects adjustments made from remedy construction sequencing and implementation details. Rev 52 schedule included a pause of Phase 2A heavy construction due to delayed receipt of vault panel components. The vault components were received in August 2023, and were installed by October 2023. On August 15, 2023, PG&E informed DTSC and DOI that PG&E intends to extend the construction pause as PG&E awaits further direction on the proposed Phase 2B design modification submitted to the agencies Dec 2022. Rev 53 schedule includes an assumption that a decision on the locations of Arsenic monitoring wells associated with FW-2 occurs in Q1 2024 and monitoring well installation by Q2 2024. Rev 54 schedule includes an assumption that a decision on FW-2 and associated arsenic monitoring wells occurs by Q1 2025. Rev 55 schedule includes an assumption that a decision on FW-2 and associated arsenic monitoring wells occurs by Q1 2026.
Phase 2B Construction and Complete Remedy Startup (Lines 1829-1903)	FF for completion of Phase 2B construction and startup of the complete remedy <ul style="list-style-type: none"> 5/1/2026 (Rev. 52) 5/1/2027 (Rev. 53) 2/18/2028 (Rev. 54) 1/30/2029 (Rev. 55) 	<ul style="list-style-type: none"> Rev 53 schedule reflects an assumption that Phase 2B planning/contracting starts in September 2024. Rev 54 schedule reflects a forecast of Phase 2B planning/contracting start in January 2025 and pipeline construction start in October 2025. With contracting for drilling underway, Rev 55 schedule reflects firmer dates for the drilling portion of Phase 2B (e.g., an initiation for drilling on March 4, start of site preparation for drilling on March 18, 2025, and start of drilling on April 8, 2025). Schedule for the remaining portion of Phase 2B (i.e., pipeline and support facilities) is just a forecast and will get firmer as planning and contracting progresses.
Soil RCRA Facility Investigation/Remedial Investigation (RFI/RI) including Risk Assessment		

RFI/RI Vol. 3 Reporting (Revised report, RTCs, Final, Approvals) (Lines 1018-1052)	<ul style="list-style-type: none"> • FF 2/22/2017 (Rev. 25) • FF 6/27/2017 (Rev. 26) • FF 7/25/2017 (Rev. 27) • FF 2/16/2017 (Rev. 28 and 29) • FF 11/15/2017 (Rev. 30) • FF 10/29/2018 (Rev. 32 and 33) • FF 12/17/2018 (Rev. 34) • FF 2/7/2019 (Rev. 35 and 36) • FF 9/24/2019 (Rev. 37 and 38) • FF 2/7/2020 (Rev. 39 and 40) • FF 6/9/2020 (Rev. 41) • FF 9/7/2020 (Rev. 42, 43) • FF 11/3/2021 (Rev. 44, 45) • FF 3/8/2022 (Rev. 46, 47) • FF 5/6/2022 (Rev. 48) • FF 10/31/2022 (Rev. 50) • FF 5/26/2023 (Rev. 51) • FF 10/13/2023 (Rev. 52) • FF 12/28/23 (Rev. 53) • AF 6/10/24 (DTSC's acceptance), 6/25/24 (DOI concurrence with DTSC's acceptance) (Rev. 54) 	<ul style="list-style-type: none"> • Adjusted schedule to incorporate results from the soil risk assessment into the RFI/RI Vol. 3 Report, and to reflect a RTC process in accordance with the October 29, 2012 letter from DTSC to Tribes, titled Response to Comments Process - PG&E Topock Compressor Station, Needles, California • Cascading changes from Work Plan Implementation/Data Gaps Evaluation. • Schedule reflects implementation of Soil RFI-RI-RA RTC protocol. • Cascading changes from Soil Risk Assessment. • Extension of schedule to reflect the additional time needed to incorporate results from the Soil Risk Assessment after agencies' approval. Additional time was also added to allow Tribes, stakeholders, and agencies more time to review the report over end of year holidays. • Extension of schedule to reflect a revision of the Soil RFI/RI Vol. 3 report and additional review as well as RTC of the revised report. • Extension of schedule reflects the actual timing of comment resolution as well as the time needed to revise the Soil RFI/RI report based on actual comment resolution. • Extension of schedule reflects an extended review/comment period for the RTC and revised sections of the report and finalize the Soil RFI/RI report. • Time extension reflects additional time needed to revise the RFI/RI Volume 3 report. • Time extension reflects an additional one month requested by stakeholders to review and provide comments, and the anticipated duration to prepare responses to comments and resolve responses. • Time extension reflects additional time for agencies' review and approval of the final Vol 3 report.
Soil Risk Assessment Addendum (Report Preparation, Review/ comment, RTCs, Final, Approval) (Lines 1002-1016)	<ul style="list-style-type: none"> • FF 5/11/2023 • FF 6/13/2023 (Rev. 49) • FF 9/4/2023 (Rev. 50) • FF 1/15/2024 (Rev. 51) • FF 9/25/2024 (Rev. 52) • FF 12/26/2024 (Rev. 53) • FF 8/13/2025 (Rev. 54) • FF 9/8/2025 (Rev. 55) 	<ul style="list-style-type: none"> • Cascading change from Soil NTCRA implementation due, primarily, to a significant larger volume of contaminated soil needing to be removed than anticipated in the NTCRA work plan. • Rev 53 schedule reflects data availability for risk assessment (RA) based a forecast completion date for NTCRA field implementation of 3/1/2024. • Rev 54 schedule reflects data availability for RA based on actual NTCRA field completion of 5/20/2024 (see below) and an extended duration for preparing the RA Addendum due to expanded scope. • Rev 55 schedule reflects an extension of the review/comment period for stakeholders/Tribes (from Jan 31 to Feb 28, 2025) due to the availability of a document (Soil NTCRA Completion Report) referenced in the Soil RA Addendum.
Soil Corrective Measure Study/Feasibility Study (CMS/FS)		

Soil Corrective Measure Study/Feasibility Study (Draft CMS/FS, RTC, Final CMS/FS, Agencies Concurrence) (Lines 1408-1429)	<ul style="list-style-type: none"> • FF 11/24/2022 (Rev. 44, 45) • FF 5/12/2023 (Rev. 46, 47) • FF 10/4/2024 (Rev. 48) • FF 10/30/2024 (Rev. 49) • FF 12/27/2024 (Rev. 50) • FF 6/20/2025 (Rev. 51) • FF 10/19/2026 (Rev. 52) • FF 1/19/2027 (Rev. 53) • FF 4/13/2027 (Rev. 54) • FF 5/7/2027 (Rev. 55) 	<ul style="list-style-type: none"> • Cascading changes from Soil RFI/RI report. • Schedule reflects the incorporation of conclusions from the Soil Risk Assessment Addendum and the NTCRA Completion Report into the Draft CMS/FS. • Cascading changes from Soil NTCRA implementation and Soil RA Addendum.
DTSC CEQA Evaluation (placeholder only) (Line 1430)	<ul style="list-style-type: none"> • To be determined after CMS/FS is complete. 	
Statement of Basis including Public Review to Remedy Adoption (Lines 1439-1445)	<ul style="list-style-type: none"> • FF 6/28/2023 (Rev. 44, 45) • FF 10/31/2023 (Rev. 46, 47) • FF 3/25/2025 (Rev. 48) • FF 4/22/2025 (Rev. 49) • FF 6/17/2025 (Rev. 50) • FF 12/9/2025 (Rev. 51) • FF 4/7/2027 (Rev. 52) • FF 7/8/2027 (Rev. 53) • FF 9/30/2027 (Rev. 54) • FF 10/26/2027 (Rev. 55) 	<ul style="list-style-type: none"> • Cascading changes from Soil RFI/RI and CMS/FS reports.
Proposed Plan/Record of Decision (Lines 1458-1467)	<ul style="list-style-type: none"> • FF 9/21/2023 (Rev. 44, 45) • FF 3/8/2024 (Rev. 46, 47) • FF 8/1/2025 (Rev. 48) • FF 8/27/2025 (Rev. 49) • FF 10/24/2025 (Rev. 50) • FF 4/17/2026 (Rev. 51) • FF 8/18/2027 (Rev. 52) • FF 11/17/2027 (Rev. 53) • FF 2/14/2028 (Rev. 54) • FF 3/3/2028 (Rev. 55) 	<ul style="list-style-type: none"> • Cascading changes from Soil RFI/RI and CMS/FS reports.
Soil Non-Time Critical Removal Action (NTCRA)		

<p>Soil Non-Time Critical Removal Action (NTCRA Work Plan, Field Implementation, Preparation and Acceptance of Completion Report) (Lines 1058-1095)</p>	<ul style="list-style-type: none"> • FF 6/19/2023 (Rev. 48) • FF 7/13/2023 (Rev. 49) • FF 10/20/2023 (Rev. 50) • FF 3/1/2024 (Rev. 51) • FF 10/7/2024 (Rev. 52) • FF 6/24/2024 (Rev. 53) • FF 2/17/2025 (Rev. 54) • AF 2/3/2025 (Rev. 55) 	<ul style="list-style-type: none"> • Schedule was updated to reflect extended duration for the RTC process associated with the NTCRA Work Plan. • Rev 52 schedule reflects the additional time needed to a) step outside of the Target Action Areas (TAAs) due to the presence of discolored materials and/or concentrations higher than the Remedial Action Goals (RAGs) and b) manage site conditions post August 2022 storm events. • Rev 53 schedule reflects the decoupling of the Soil NTCRA completion report and the Soil RA Addendum. The Soil RA Addendum will incorporate validated NTCRA data and will feed into the Soil Corrective Measure Study/Feasibility Study. Rev 53 reflects a forecast field completion for NTCRA of 3/1/2024. • Rev 54 schedule reflects the actual field completion for NTCRA of 5/20/2024 and an extended duration for preparing the completion report due to expanded scope (e.g., large quantity of waste removed, inclusion of CSM discussions for the NTCRA areas).
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