

Handout 12B
Schedule Highlights
Summary of Key Schedule Changes

Consultative Work Group Meeting
December 4, 2024

Schedule Highlights

Text in “red font” represents updates from last CWG (Dec 5, 2023)

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 9/30/25
 - Mobilization – 2/14 to 3/7/22
 - Pilot Borehole/Well Installation/Well Buildout – 3/8/22 to 9/30/25
 - Assumes a decision is made on FW-02 and associated arsenic MWs by Q1 2025
 - 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 next page for update 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.*

*** Schedule is dependent on timing of decision on FW-02 and associated arsenic MWs*

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
- **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 - ongoing
- 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

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

- Planning/Contracting – Forecast January to September 2025
- Site Kick-Off Meeting – Forecast October 2025
- Construction – Forecast October 2025 to May 2027
- Complete Remedy Startup – Forecast February 2028

** 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-2 is combined with Phase 2B pipelines.*

Five-Year Review of Groundwater Remedy

- First Five-Year Review
 - Public Notice/Factsheet – May 1, 2023
 - Request for Interview – May 1 to May 31, 2023
 - Interview – June 1 to July 31, 2023
 - Prepare Five-Year Review Report – May 1 to **December 7, 2023**
 - Notice of Report Availability – **December 7, 2023**

Soil RFI/RI Reporting (Volume 3)

- Soil RFI/RI Report

- Review and Comment

- Tribes and Stakeholder Review: 10/3/22 – 1/31/23
- Agencies Review: 10/3/22 – 3/28/23
- PG&E Review Comments/Prepare Responses – 3/29 – 6/28/23
- Comment Resolution – 7/13 – 8/1/23

- Submit Final Report – October 2, 2023

- Agencies Review – October 2023 – June 2024

- DTSC Provided Acceptance of Final Report – June 7, 2024

- DOI Concurred with DTSC's Acceptance – June 25, 2024

Soil Non-Time Critical Removal Action

NTCRA Work Plan Implementation, Reporting, and Agency Acceptance

- Soil NTCRA Implementation (includes restoration of Soil Processing Yard) – July 2022 to **May 20, 2024**
- Soil NTCRA Completion Report*
 - **Draft report submitted to DOI – November 1, 2024**
 - **DOI review/comment – November 1 to December 20, 2024**
 - **PG&E respond to comments/finalize report – February 2025**
- DOI review/accept report – **Forecast February 2025**

** The Soil NTCRA Completion Report is independent from the Soil Risk Assessment Addendum. The Risk Assessment Addendum will incorporate validated NTCRA data and will feed into the Soil Corrective Measure Study/Feasibility Study.*

Soil Risk Assessment (RA) Addendum

- Soil Risk Assessment Addendum Timeline
 - Prepare/submit RA Addendum: December 13, 2024
 - Tribes/Stakeholders review/comment: 45 calendar days (December 16, 2024 to January 30, 2025)
 - Agencies review/comment: 60 calendar days (December 16, 2024 to February 14, 2025)
 - Review RTCs/comment resolution: Forecast mid February - early June 2025
 - Finalize/submit RA Addendum: Forecast late July 2025
 - Agencies' Approval: Forecast August 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 August 2025 - June 2026**
 - Tribes/Stakeholders review/comment: 60 calendar days
 - Agencies review/comment: 75 calendar days
- Prepare RTCs/Comment Discussion: **Forecast August – December 2026**
- Finalize/submit final CMS/FS: **Forecast December 2026 - March 2027**
- Agencies' Concurrence: **Forecast April 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 an investigation workplan – September 6, 2024
- Workplan under review by agencies

Summary of Schedule Changes

Handout 12B

Summary of Key Schedule Changes since August 15, 2007 (Rev. 54)

Yellow highlights are changes since December 5, 2023 CWG

Activities	Forecast Schedule Deviation	Key Reasons
Groundwater Remedy Construction		
Phase 2A Construction (Lines 1814-1820)	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) 	<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.
Phase 2B Construction and Complete Remedy Startup (Lines 1822-1846)	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) 	<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 construction start in October 2025.
Soil RCRA Facility Investigation/Remedial Investigation (RFI/RI) including Risk Assessment		
RFI/RI Vol. 3 Reporting (Revised report, RTCs, Final, Approvals) (Lines 1030-1052)	<ul style="list-style-type: none"> • FF 7/8/2014 (Rev. 15) • FF 10/1/2014 (Rev. 16) • FF 8/18/2015 (Rev. 17) • FF 12/29/2015 (Rev. 18) • FF 7/26/2016 (Rev.20) • FF 10/25/2016 (Rev. 22) • FF 10/24/2016 (Rev. 23) • FF 2/7/2017 (Rev. 24) 	<ul style="list-style-type: none"> • Adjusted schedule to reflect current anticipated approval date and scope of the Final Soil RFI/RI Work Plan. • Cascading changes from Soil Work Plan approval and Soil EIR. • Cascading changes from Soil Work Plan approval and implementation. • Cascading changes from Soil Work Plan implementation/Data Gaps Analysis.

<p>RFI/RI Vol. 3 Reporting (Revised report, RTCs, Final, Approvals) (Lines 1030-1052) (Continued)</p>	<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.
<p>Soil Risk Assessment Addendum (Report Preparation, Review/comment, RTCs, Final, Approval) (Lines 1003-1016)</p>	<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) 	<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.
<p>Soil Corrective Measure Study/Feasibility Study (CMS/FS)</p>		
<p>Soil Corrective Measure Study/Feasibility Study (Draft CMS/FS, RTC, Final CMS/FS, Agencies Concurrence) (Lines 1403-1423)</p>	<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) 	<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.

<p>Soil Corrective Measure Study/Feasibility Study (Draft CMS/FS, RTC, Final CMS/FS, Agencies Concurrence) (Lines 1403-1423) (Continued)</p>	<ul style="list-style-type: none"> • FF 6/20/2025 (Rev. 51) • FF 10/19/2026 (Rev. 52) • FF 1/19/2027 (Rev. 53) • FF 4/13/2027 (Rev. 54) 	<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.
<p>DTSC CEQA Evaluation (placeholder only) (Line 1424)</p>	<ul style="list-style-type: none"> • To be determined after CMS/FS is complete. 	
<p>Statement of Basis including Public Review to Remedy Adoption (Lines 1434-1439)</p>	<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) 	<ul style="list-style-type: none"> • Cascading changes from Soil RFI/RI and CMS/FS reports.
<p>Proposed Plan/Record of Decision (Lines 1453-1461)</p>	<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) 	<ul style="list-style-type: none"> • Cascading changes from Soil RFI/RI and CMS/FS reports.

Soil Non-Time Critical Removal Action (NTCRA)

Soil Non-Time Critical Removal Action (NTCRA Work Plan, Field Implementation, Preparation and Acceptance of Completion Report) (Lines 1054-1089)

- 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)

- 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).