

Handout 9B

Schedule Highlights

Summary of Key Schedule Changes

Consultative Work Group Meeting
September 10, 2025

Schedule Highlights

Text in “red font” represents updates from last CWG (March 5, 2025)

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 7/14/28
 - 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
 - Construction of Pipeline C18 in East Ravine – Mid Aug to End of Dec 2025
 - Vaults and Electrical – 1/3/28 to 7/14/28
 - Startup – Combine with Phase 2B for complete remedy startup

** 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/JJ, and Arsenic MWs MW-AA/BB/CC/DD/FF/GG)*
- Pipeline Planning/Preparation – January 2025 to March 2026
- 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 – August 2028 to February 2029
- Completed System Start-Up/Start of O&M – February 2029

** Per 2015 BOD, the Inner Recirculation Loop consists of IRL wells in the uplands and Riverbank (RB) wells along the riverbank.*

Soil Post-NTCRA Risk Assessment (RA)

- Soil **Post-NTCRA** Risk Assessment Timeline
 - Prepare/submit post-NTCRA Risk Assessment: December 13, 2024
 - Tribes/Stakeholders review/comment: December 16, 2024 to February 28, 2025
 - Agencies review/comment: December 16, 2024 to May 12, 2025
 - **RTC process**
 - ☐ Sent RTC Table – August 5, 2025
 - ☐ Hold RTC Meetings – October 9 and 16, 2025
 - Finalize/submit final RA: **Forecast mid-December 2025**
 - Agencies' approval/acceptance: **Anticipate 2 weeks after receipt of final RA**
- Results of the final Soil Post-NTCRA RA will be incorporated into the Soil Corrective Measure Study/ Feasibility Study (CMS/FS)

Soil Corrective Measure Study/Feasibility Study (CMS/FS) and Agencies' Decision Documents

- As previously mentioned, the Rainbow schedule has placeholders for Soil CMS/FS and related Agencies' decision documents
 - Placeholder process/duration were copied from Topock groundwater CMS/FS. To be evaluated and adjusted as necessary for soil.
- Key milestones include:
 - Prepare/submit draft CMS/FS: **Q4 2026**
 - ☐ Tribes/Stakeholders review/comment: 60 calendar days
 - ☐ Agencies review/comment: 75 calendar days
 - Prepare RTCs/Comment Discussion: **Q1-Q2 2027**

Soil Corrective Measure Study/Feasibility Study (CMS/FS) and Agencies' Decision Documents

- Prepare/submit final Soil CMS/FS: Q3 2027
- Agencies' approval/concurrence: Q3 2027
- *Agencies' decision documents and CEQA evaluation are placeholder items in the Rainbow schedule 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 reviewed/provided comments – April 14, 2025
- PG&E prepared/submitted RTC table to DTSC – May 14, 2025

Summary of Schedule Changes

Handout 9B

Summary of Key Schedule Changes since August 15, 2007 (Rev. 57)

Yellow highlights are changes since June 18, 2025 CWG

Activities	Forecast Schedule Deviation	Key Reasons
Groundwater Remedy Construction		
Phase 2A Construction (Lines 1818-1832)	FF for completion of Phase 2A construction 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) 7/14/2028 (Rev. 56 and 57)	- 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. - Rev 56 schedule includes a new line item "Vault and Electrical" with timeline from Jan to July 2028.
Phase 2B Construction and Complete Remedy Startup (Lines 1833-1918)	FF for completion of Phase 2B construction and startup of the complete remedy 5/1/2026 (Rev. 52) 5/1/2027 (Rev. 53) 2/18/2028 (Rev. 54) 1/30/2029 (Rev. 55) 2/16/2029 (Rev. 56 and 57)	- 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. - Rev 56 shows more details about pipeline planning/construction and an extension of system integration and testing timeline (from 70 to 140 days).

Soil RCRA Facility Investigation/Remedial Investigation (RFI/RI) including Risk Assessment		
Soil Post-NTCRA Risk Assessment (Report Preparation, Review/comment, RTCs, Final, Approval) (Lines 1002-1018)	• 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) • FF 11/18/2025 (Rev. 56) • FF 12/26/2025 (Rev. 57)	• 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. • Rev. 56 reflects an extension of the agencies' review period. • Rev. 57 reflects additional time for RTC review and additional comment discussion meeting.
Soil Corrective Measure Study/Feasibility Study (CMS/FS) and Related Agencies' Decision Documents		
Soil Corrective Measure Study/Feasibility Study (Draft CMS/FS, RTC, Final CMS/FS, Agencies Concurrence) (placeholder only, Lines 1412-1433)	• 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) • FF 7/19/2027 (Rev. 56) • FF 8/27/2027 (Rev. 57)	• 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 Post-NTCRA RA. • Cascading changes from Soil Post-NTCRA RA.
DTSC CEQA Evaluation (placeholder only, Line 1434)	• To be determined after CMS/FS is complete.	

Statement of Basis including Public Review to Remedy Adoption (placeholder only, Lines 1443-1449)	• 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) • FF 1/5/2028 (Rev. 56) • FF 2/15/28 (Rev. 57)	• Cascading changes from Soil RFI/RI and CMS/FS reports.
Proposed Plan/Record of Decision (placeholder only, Lines 1462-1471)	• 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) • FF 5/17/2028 (Rev. 56) • FF 6/23/2028 (Rev. 57)	• Cascading changes from Soil RFI/RI and CMS/FS reports.