

STATE OF TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Remediation - Oak Ridge 761 Emory Valley Road Oak Ridge, Tennessee 37830



January 9, 2023

Mr. Roger Petrie
Federal Facility Agreement Manager
Oak Ridge Office of Environmental Management
U.S. Department of Energy
Post Office Box 2001
Oak Ridge, Tennessee 37831

Review of the 2021 Fifth CERCLA Five-Year Review of the U.S. Department of Energy Oak Ridge Site, Oak Ridge, Tennessee (DOE/OR/01-2895&D2)

Dear Mr. Petrie

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation Oak Ridge Office has reviewed the subject document pursuant to the Federal Facility Agreement for the Oak Ridge Reservation.

TDEC Comment 37 Response

TDEC agrees that site-specific information improves the BAF models, and the wren call study cannot be used to draw conclusions about absolute risk. While the site-specific prey item data has been used to update associated parameters, other model parameters still rely on assumptions from theoretical or literature-reported data that are not site-specific and do not have unanimous agreement on application among the FFA parties. Given this continued disagreement regarding the final state of the BAF models and PRG calculations, TDEC believes additional work to directly sample ecological endpoint receptors is warranted and will help clarify this issue. TDEC has agreed to continue this discussion with DOE and will also pursue conducting work to directly sample ecological endpoint risk receptors in LEFPC.

No additional changes to the document are requested, and TDEC has no further comments.

Questions or comments concerning the contents of this letter should be directed to Dana Casey at the above address, by phone at (865) 220-6598 or by email at dana.casey@tn.gov.

Sincerely

Randy C. Young,

FFA Project Manager

Division of Remediation-Oak Ridge Office

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