



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
Division of Remediation - Oak Ridge  
761 Emory Valley Road  
Oak Ridge, Tennessee 37830

January 19, 2023

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

RECEIVED  
JAN 23 2023  
COUNTY MAYOR'S OFFICE

Dear Mr. Petrie

**TDEC Comment Letter Addendum to the Removal Action Work Plan for the Y-12 Facilities Deactivation/Demolition Project, Oak Ridge, Tennessee: Beta-1 Complex Demolition (DOE/OR/01-2479&D1/A14)**

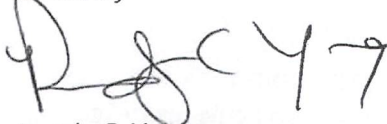
The Tennessee Department of Environment and Conservation, Division of Remediation-Oak Ridge Office, received the above referenced submittal on October 24, 2022. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. The following comments are relevant to that review:

1. The LGWO is not an approved location for treatment of wastewater from Y-12. Any reference to using the LGWO to treat water from slab decontamination activities or to dispose of accumulated water should be removed from the document. The State recommends that DOE obtain approval of the recently submitted *Addendum to the Action Memorandum for the Y-12 Facilities Non-Time Critical Removal Action Deactivation/Demolition* (DOE/OR/01-2462&D2/A1) before moving forward with resubmittal of this document.
2. **Page 1, 3<sup>rd</sup> paragraph, Section 1. Introduction.** *"The pre-demolition Removal Action Work Plan addendum was revised in spring 2022 to include basement dewatering and deactivation details."* The pre-demolition Removal Action Work Plan addendum referenced in this sentence was submitted to the FFA parties for review in November of 2022. At this time, the FFA parties have not reached agreement on the addendum. To ensure consistency between the documents, the State recommends that DOE resolve any concerns associated with the pre-demolition Removal Action Work Plan addendum prior to resubmitting this document.
3. **Page 8, 2<sup>nd</sup> paragraph, 1<sup>st</sup> bullet, Section 2. Facility Description.** Beryllium is identified as a contaminant of concern. Therefore, this RmAWP addendum should discuss how beryllium contamination will be managed during demolition.

4. **Page 8, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> bullet, Section 2. Facility Description.** If free mercury or other anomalous waste is identified, the FFA parties should be notified as soon as possible, and discussions should be held with the FFA parties to identify the appropriate path forward. Please include additional clarification in Section 4.1 of the document.
5. **Page 13, 5<sup>th</sup> bullet, Section 4.1 Demolition.** Please identify that the CMCP will be provided to the FFA parties for information.
6. **Page 14, Section 4.1 Demolition.** Please include a bullet that describes how the removal of remaining basement piping that has been encased within CLSM will be accomplished.
7. **Page 15, Section 4.2.** Any water (stormwater or dust suppression water) that has had contact with the site or debris must be sampled prior to discharge. In accordance with the ARARs in the AM, stormwater discharges cannot violate AWQC. Please update this section of the document to address those requirements.
8. **Page 21, Table 3, Section 6. Project Schedule.** A milestone for submittal of the WHP should be established in Appendix E of the FFA.

Review of this document meets the review cycle protocol of 90 days. Questions or comments concerning the contents of this letter should be directed to Angel Perkey at the above address or by phone at (865) 220-6565.

Sincerely



Randy C. Young  
FFA Project Manager  
Division of Remediation - Oak Ridge Office

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