



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

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COUNTY MAYOR'S OFFICE

January 27, 2023

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

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 Pre-Demolition (DOE/OR/01-2479&D1/A9/R1)

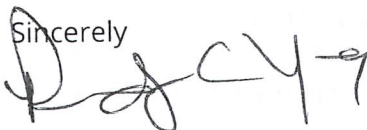
The Tennessee Department of Environment and Conservation, Division of Remediation-Oak Ridge Office, received the above referenced submittal on November 22, 2022. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. The following comments are relevant to that review:

1. **Page 15, Section 3, 2nd paragraph.** Please include 40 CFR 122.4(i) as an ARAR.
2. **Page 17, Section 4.1, last bullet.** Define what is meant by "as needed" in the first sentence.
3. **Page 17, Section 4.1, last bullet.** Change "released" to "discharged" in the second sentence.
4. **Page 18, Section 4.2, 1st sentence.** Please change "goals" to "limits."
5. **Page 18, Section 4.2, 2nd paragraph.** Please change "goals" to "limits" in the first and eighth lines.
6. **Page 18, Section 4.2, 3rd paragraph.** Please delete "goals and" in the third line.
7. **Page 18, Section 4.2, last paragraph.** Please delete "goals and" in the first line.
8. **Page 19, Section 4.2, last paragraph and Page 20, Section 4.2, and 2nd paragraphs.** Delete these paragraphs, as the LGWO is not an approved location for the treatment of wastewater from Y-12.

9. **Page 20, Section 4.3, 2nd paragraph.** Delete “with the exception of PCBs.” EPA Method 1668 A-C should be used to ensure adequate detection of PCBs. It has been demonstrated to have a detection limit below AWQC. Compliance with the PCB recreational AWQC must be clearly stated.
10. **Page 20, Section 4.3, 3rd paragraph.** Please add “water quality” in front of “standard” in the third line.
11. **Page 20, Section 4.3, last paragraph.** Please explain the relevance of this paragraph and to what parameters this language is applicable. TDEC’s anti-degradation regulation applies economic and social justification in regards to waters with available parameters (see TDEC 0400-40-03-.06(3)) rather than those with unavailable parameters.
12. **Page 23, Section 5, 2nd paragraph.** Define what is meant by “periodically” in the fourth sentence.
13. **Page 23, Section 5, 3rd paragraph.** Delete this paragraph, as the LGWO is not an approved location for the treatment of wastewater from Y-12.
14. **Page 25, Section 6, Table 4.** A milestone for submittal of the Pre-Demolition PCCR 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) 220-6559.

Sincerely



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

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