



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

April 3, 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: Alpha-2 Complex Demolition (DOE/OR/01-2479&D1/A13/R2)**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on March 3, 2023. The document has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation. The following comments are relevant to that review:

1. The document should be updated to reflect the change in demolition approach for the basement and the revised mercury management strategy. Planned remediation activities should be accurately represented in the document.
2. Please revise the document to include a management plan for the contaminated water in the basement. The plan should include details on how water within the flooded areas is currently and/or will be managed, as well as how water in the basement that is displaced by controlled low-strength material (CLSM) will be managed. These details should include the analytical testing being performed, identification of treatment system(s) that are being considered for water treatment, and the decision criteria for determining where the water is sent for treatment prior to discharge. The document fails to present this information for review.
3. **Page 17, 4<sup>th</sup> bullet.** This bullet should be revised to indicate FFA tri-party involvement in determining whether a contingency action is necessary, consistent with the *Notice of Non-Significant Change to the Record of Decision for Phase I Interim Source Control Actions in Upper East Fork, Poplar Creek Characterization Area* submitted on March 14, 2023. TDEC's suggestion for revision is included below:

The FFA parties recognize that there could be impacts to the underlying groundwater and nearby surface water when the sump is turned off. DOE will monitor both the groundwater and the surface water as presented in this work plan and will provide the data in a timely manner to the FFA parties for evaluation. If evaluation of the monitoring results suggests impacts to surface water or groundwater, or if mercury is detected in groundwater samples from the wells monitored, the FFA parties will begin discussions on the need for contingency actions. The FFA parties will evaluate the feasibility of various options, including installing a groundwater extraction well outside the Alpha-2 footprint or in the vicinity of the basement sump with the discharge routed to the Big Spring Water Treatment System, and propose an alternative to address the release.

4. **Page 21, Table 3.** Considering that the contaminated water in the basement will be displaced when the basement is filled with CLSM, surface water sampling should occur weekly, beginning when the sump is shut off through building demolition.
5. **Page 22, 1<sup>st</sup> paragraph.** Remove the reference to the Clean Water Act (40 CFR 136) and include a statement that says a sufficiently sensitive analytical method will be used to assess compliance with Ambient Water Quality Criteria.

Review of this document meets the review cycle protocol of 30 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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