



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

April 17, 2023

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

RECEIVED  
APR 19 2023  
COUNTY MAYOR'S OFFICE

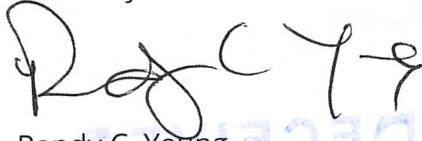
Dear Mr. Petrie

**RE: 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/R2)**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on March 17, 2023. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. At this time, TDEC does not support the use of the National Pollutant Discharge Elimination System -permitted Liquid and Gaseous Waste Operations (LGWO) at the Oak Ridge National Laboratory to treat mercury-contaminated wastewater. Since there is no limit for mercury in the LGWO permit and this document does not propose a limit for allowable mercury discharge, the protection of White Oak Creek (WOC) cannot be assured. If DOE chooses to move forward with the scope of this Removal Action Work Plan addendum without TDEC approval, TDEC will conduct independent sampling of the discharge and use limits established by TDEC's Division of Water Resources (0.00057 lbs/day, which equates to 249 ng/L using Division of Water Resources procedures for establishing limits) to assess whether the discharge remains protective of WOC. TDEC and the Environmental Protection Agency should be notified prior to mercury-contaminated wastewater being sent to the LGWO from Beta-1 basement dewatering. This notification must include the volume of wastewater and the concentration of mercury in the wastewater to assist TDEC's evaluation of the effectiveness of the LGWO treatment.

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

ec: Samantha Urquhart-Foster - EPA  
Jon Richards - EPA  
David Andrews - EPA  
Sam Scheffler - DOE  
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