

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

COUNTY MAYOR'S OFFICE

May 26, 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

RE: Transmittal of the 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/R1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on April 24, 2023. The document has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation. The following actions, which reflect recent agreements with the Department of Energy (DOE), require completion to gain TDEC support for initiating the scope of work described in the document:

- As discussed between TDEC and DOE, the *Remedial Action Work Plan/Waste Handling Plan* for Liquid and Gaseous Waste Operations at the Oak Ridge National Laboratory, Oak Ridge, *Tennessee: Facility and Equipment Deactivation/Small-Scale Demolition* (LGWO RAWP/WHP) requires revision to add appropriate discharge limits for mercury-contaminated wastewater.
- As discussed between TDEC and DOE, the *Action Memorandum for the Y-12 Facilities Deactivation/Demolition Project* (AM) requires revision to reference the LGWO RAWP/WHP in regard to discharge of mercury-contaminated wastewater.
- Because a Data Quality Assessment meeting has not been conducted for the demolition
  waste characterization, at this time TDEC cannot determine the adequacy of the general
  best management practices described in this work plan. However, DOE has committed
  to providing both the Environmental Protection Agency and TDEC with a to-bedeveloped Contamination Migration Control Plan (CMCP) that provides for specific site
  controls to prevent construction activities from contaminating the surrounding media.
  The knowledge of specific contaminants, as well as their concentrations and locations
  within the facilities, are vital considerations to establish appropriate contaminant
  migration controls during demolition. TDEC expects the CMCP to include all the
  appropriate contaminant migration controls.

Mr. Roger Petrie May 26, 2023 Page 2 of 2

TDEC looks forward to working with DOE to take the necessary actions listed above and move forward with this project. Questions or comments concerning the contents of this letter should be directed to Angel Perkey at the above address or by phone at (865) 985-6851.

XC:

Sincerely Randy C Young

Digitally signed by Randy C Young Date: 2023.05.26 09:34:17 -04'00'

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

ec: Samantha Urquhart-Foster – EPA Jon Richards – EPA David Andrews – EPA Sam Scheffle DOE Brian Henry – DOE Morgan Carden – DOE Tanya Salamacha – UCOR Sid Garland – UCOR ORSSAB OREM Mailroom Colby Morgan – TDEC Chris Thompson – TDEC Amy Fitzgerald – ORRCA Wade Creswell – ORRCA Amanda Daugherty – ORRCA Terry Frank - ORRCA