



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

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JUN 19 2023
COUNTY MAYOR'S OFFICE

June 16, 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 Response to Comments on the 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 May 18, 2023. The submittal included a response to TDEC comments only and identified the D1/A13/R2 version of the document as the final revision. The submittal has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation. The following issues should be addressed before TDEC can support moving forward with the scope of work described in the *Addendum to the Removal Action Work Plan for the Y-12 Facilities Deactivation/Demolition Project, Oak Ridge, Tennessee: Alpha-2 Complex Demolition* (RmAWP):

- It should be noted that the U.S. Department of Energy (DOE)'s response to TDEC Comment #3 identifies the *Non-Significant Change to the Record of Decision for Phase I Interim Source Control Actions in Upper East Fork Poplar Creek Characterization Area, Oak Ridge, Tennessee* (NSC) submitted on March 14, 2023, to contain the governing language for the FFA parties' role in determining if a contingency action is needed. While text on page 17 (last bullet) is inconsistent with the NSC language, TDEC is satisfied that the NSC is the governing document.
- DOE should keep TDEC updated on the plans for the treatment and disposition of any water that may need to be removed from the basement during implementation of sampling tasks outlined in the Alpha 2 basement data quality objective (DQO) and during controlled low-strength material (CLSM) emplacement.
- TDEC appreciates DOE's agreement to conduct weekly mercury sampling of Upper East Fork Poplar Creek during the first month of CLSM placement, consistent with the response to TDEC Comment #4.
- TDEC expects a sufficiently sensitive analytical method to be used in assessing compliance with Ambient Water Quality Criteria.

- The RmAWP addendum does not include any significant discussion of special waste handling requirements for hazardous waste due to mercury. Additional plans should be prepared and provided to TDEC that include specific details related to how visible mercury will be identified, how/when visible mercury inspections will be conducted, special considerations for piles of debris with visible mercury throughout, etc. TDEC looks forward to working with DOE to determine how to best document the additional plans necessary for managing mercury-contaminated hazardous waste.
- Because a Data Quality Assessment (DQA) meeting has not been finalized 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-be-developed 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, is crucial to establishing appropriate contaminant migration controls during demolition. TDEC expects the CMCP to include all the appropriate contaminant migration controls.
- Section 5 of the RmAWP addendum identifies the Environmental Management Waste Management Facility as the expected disposal outlet for most of the demolition debris. Considering that Alpha-2 is a mercury process building with Resource Conservation and Recovery Act of 1976 characteristic waste present, TDEC expects to revisit that determination during the DQA. TDEC expects all mercury hazardous waste to be sent offsite for disposal.

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) 985-6851.

Sincerely

Randy C Young Digitally signed by Randy C Young
Date: 2023.06.15 13:55:56 -04'00'

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

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