



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

RECEIVED  
OCT 27 2023  
COUNTY MAYOR'S OFFICE

October 26, 2023

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

**Re: Review of the Proposed Administrative Record Index for the Interim Record of Decision for Groundwater in the Main Plant Area at the East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2949&D1)**

Dear Mr. Petrie

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office (DoR-OR), received the U.S. Department of Energy (DOE) letter transmitting the above referenced document on August 10, 2023. TDEC has completed its review of the proposed administrative record and offers comments regarding the subject proposed record for the *Interim Record of Decision for Groundwater in the Main Plant Area at the East Tennessee Technology Park*.

TDEC recommends review of the subject proposed record to ensure all records are linked to the appropriate document reference.

- Order number E.0525.029.0013 in this administrative record list is tied to report number DOE/OR/01-2835&D2 and is titled "EPA Approval of DOE ETPP Main Plant Area Groundwater D2 Focused Feasibility Study at ETPP."
  - However, the Focused Feasibility Study (FFS) work scope is tied to report document #2894.
  - The original Feasibility Study (FS) for the whole site, that was not approved by the triparties, is tied to report #2835. Tying an approval to the wrong unapproved document may be misleading.

The subject administrative record index for Main Plant Area Groundwater at East Tennessee Technology Park (ETTP) should include:

- *Remedial Investigation Report for the East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-1778&D1)*, January 1999: Multiple volumes.
- The *Final Sitewide Remedial Investigation and Feasibility Study for ETPP (DOE/OR/01-2279&D3)* (unapproved) November 2007, which includes:
  - Vol 1 Main Text;
  - Vol 2 Appendices A-D; and
  - Vol 3 Appendices E-K.

In general, the administrative record is cumbersome and difficult to follow for the ETPP groundwater work scopes. Groundwater work specifically at this ETPP site has been intermittent with disparate focuses and changing physical boundaries of focus units. In addition, data has been collected in multiple ways for multiple projects spanning multiple decades. To facilitate clarity and availability of the historical data related to this site and to ensure the complete administrative record set is available to the public, TDEC recommends providing a list (in the Record of Decision document or other relevant manner) that would cite the document numbers and correlate the work associated with them. As the document number is a key method for stakeholders searching the DOE Information Center database and records, it is important to be able to understand which documents apply and how these documents relate to ETPP Groundwater to date. Also, TDEC recommends including for the record which version of the document (D1, D2, D3, etc.) was approved by the Federal Facility Agreement parties versus those documents that did not receive triparty approval.

For example, please consider this crosswalk format:

Prefix to record number	Report number reference	General titles of the document series	Years documents were generated	Version of document approved (e.g., D1, D2, etc.)
DOE/OR/01 -	1778	Initial Remedial Investigation Report for the East Tennessee Technology Park - unapproved	1999	
DOE/OR/01 -	2279	The Final Sitewide Remedial Investigation and Feasibility Study (RI/FS) for ETPP - unapproved	2007	
DOE/OR/01 -	2387	Phase 1 Treatability Studies	2008, 2009, 2010	
DOE/OR/01 -	2499	Design Characterization Activities for the Sitewide Groundwater Treatability Study	2011, 2016	
DOE/OR/01 -	2768	Design Characterization Completion Report for the Sitewide Treatability Study	2018	
DOE/OR/01 -	2835	ETPP MP GW Feasibility Study - unapproved	2019	
DOE/OR/01 -	2894	Focused Feasibility Study for Main Plant GW at ETPP (to address the focused IROD scope of source cleanup of high concentration CVOC areas)	2021	
DOE/OR/01 -	2921	Proposed Plan for the Interim Record of Decision (IROD) for Main Plant GW at ETPP	2022, 2023	
DOE/OR/01 -	2949	Interim Record of Decision (IROD) for Main Plant GW at ETPP – covering 6 SVOC source areas	2023	

If you have questions or comments concerning the contents of this letter, please feel free to reach out to Heather Lutz at [heather.lutz@tn.gov](mailto:heather.lutz@tn.gov) or (865) 310-0474.

Sincerely

**Randy C Young**

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

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