



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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COUNTY MAYOR'S OFFICE

November 1, 2023

Mr. Roger Petrie
Federal Facility Agreement Manager
Oak Ridge Office for Environmental Management
Department of Energy
PO Box 2001
Oak Ridge, TN 37831

Dear Mr. Petrie

RE: Addendum 2 (Exposure Unit Z2-17) to the Fiscal Year 2009 Phased Construction Completion Report for Zone 2 Exposure Units 11, 12, 17, 18, 29, and 38 at East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2415&D2/A2)

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation, Oak Ridge Office (DoR-OR) is in receipt of the Department of Energy (DOE) letter dated August 28, 2023, transmitting the above referenced document. DoR-OR received the transmittal the same day. TDEC has completed a review of the document pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation and offers the following comments for consideration:

1. **Page 3, Section 2, third paragraph**
The K-802 RCWC, K-802 pump house, K-801-H basin, and K-802-H basin are not shown in the figure, as stated. Please label these features in Figure 2.
2. **Page 9, Section 4, last paragraph**
The first sentence states that sample location Z2-EU17B-417 is a soil sample, while Table 1 indicates it is a concrete/paint sample. Please address this discrepancy.
3. **Page 10, Table 1**
For clarity, please insert "Pre-RA" in the title before "sample summary".
4. **Page 35, Section 5.2.2, first paragraph**
The text states that confirmation samples from the K-1066-F asphalt excavation were collected in 2018, while Table 3 indicates they were collected in 2017. Please address this discrepancy.

5. **Page 50, Section 5.4.3, paragraph below Table 8**

The paragraph states chromium exceeded the groundwater (GW) maximum contaminant level (MCL) in BRW-061 in May 2018, but was not seen in samples collected from 1989 to 1995 or in the October 2018 sampling event. Based on these observations, the conclusion is made that groundwater soil screening level (SSL) exceedances in soil are not considered a threat to groundwater. In the referenced 2009 Technical Memorandum, Appendix B of this Phased Construction Completion Report, the sole basis for concluding there is no threat to groundwater for chromium was due to the older groundwater data that did not show MCL exceedances. Essentially, it was determined that despite having GW SSL exceedances, no wells had MCL exceedances leading to the no threat determination. While this was true at the time, the May 2018 MCL exceedance seems to weaken the no threat determination. DOE should consider further evaluation and revise the no threat determination appropriately.

This letter meets the FFA review cycle protocol of 90 days for the subject document. TDEC looks forward to working with DOE to ensure timely resolution of these comments. Questions or comments concerning the contents of this letter should be directed to Randy Hoffmeister at the above address or by phone at (865) 985-2513.

Sincerely

Randy C Young

Digitally signed by Randy C
Young
Date: 2023.10.30 19:20:51 -04'00'

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

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