



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

RECEIVED
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COUNTY MAYOR'S OFFICE

November 16, 2023

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

RE: Removal Action Report for the Poplar Creek Mudflat Sediment Time-Critical Removal Action at the East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2952&D1)

Dear Mr. Petrie

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 30, 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:

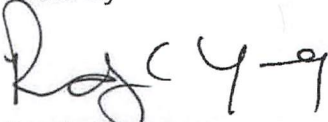
1. **Page 13, Section 4.1**
Building K-1410 is identified as "K-1401". Please correct this reference.
2. **Page 16, Section 4.1.3 and Page 17, Figure 15**
Clarification is needed regarding the difference between "post-TCRMA sediment samples" and "confirmation samples". The text discusses the collection of three surface sediment grab samples from the excavation floor after removal of radiologically contaminated, exposed sediment. The three sample locations are identified in Figure 15 as "confirmation samples", although they are not traditionally defined confirmation samples, as it is understood that some level of contamination was left in place (and mitigated by the geomembrane and stone placement). Please evaluate the appropriateness of using the term "confirmation sample" in Figure 15 and elsewhere in the document.

3. **Appendix A, Table A.1**

Please include a footnote to the table stating why some data results are J-flagged when the measured results, even after accounting for rad error, are well above the detection limit. Please confirm that the sample results provided in the table represent conditions after excavation and not prior to confirm the bounds of the area to be excavated. Could the flagged data points with higher measured values cause misinterpretation of the bounds of the excavation area or in determining the sufficiency of the excavation?

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
FFA Project Manager
Division of Remediation - Oak Ridge Office

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Joanna Hardin, DOE
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