



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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JUL 17 2024
COUNTY MAYOR'S OFFICE

July 15, 2024

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

Dear Mr. Petrie

TDEC Comment Letter Addendum to the Removal Action Work Plan for the Y-12 Facilities Deactivation/Demolition Project, Oak Ridge, Tennessee. A15 - Demolition of Steam Plan Complex Ancillary Facility 9616-9 (DOE/OR/01-2479&D1/A15)

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation received the above referenced letter from the U.S. Department of Energy (DOE) on April 17, 2024. The document has been reviewed pursuant the Federal Facility Agreement (FFA) for the Oak Ridge Reservation.

While FFA tri-party approval is not required for Removal Action Work Plans (RmAWP) per the FFA, engaging in tri-party issue resolution early in the process facilitates effective environmental protectiveness and alleviates difficulty with regulatory approval of primary documents later in the FFA process. For example, considering there was no recent project information preceding this submittal, a scoping meeting to review this demolition plan with TDEC and the U.S. Environmental Protection Agency (EPA) would have been advantageous. The schedule presented in the document does not provide adequate time for appropriate TDEC involvement for this FFA document. In consideration of the amount of feedback and comments shared below from TDEC, this submittal could have benefited from additional time incorporated into the schedule for FFA tri-party discussions about the expectations for this particular work plan. TDEC realizes this site is presented as a lower risk facility. Yet, there have been unanticipated contamination issues with multiple projects across the reservation where work was conducted without adequate plans in place. Appropriately utilizing the FFA and tri-party involvement helps to ensure an environmentally responsible completion of Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) projects on the reservation.

DOE must execute the project in accordance with relevant and appropriate environmental regulations. During implementation of the project, TDEC expects DOE to apply the comments and recommendations provided here to the demolition plan to ensure field activities are protective of the environment.

The following comments are relevant to TDEC's review of the document and demonstrate failure of the work plan to document measures and considerations for protection of the environment during the remedial action:

General Comments:

1. Utilizing Best Management Practices (BMPs) is necessary to be environmentally protective during demolition. The document does not include a section for BMPs which would include discussion on the following topics:
 - a. Specific storm water controls (wattles, berms, etc.)
 - b. Plugging the slab penetrations, catch basins, sewer lines, etc.
 - c. Baseline sampling, rain event, and post-demolition monitoring
 - d. Contaminants of concern (COCs) for this project
 - e. How accumulated water will be managed and decontaminated (as necessary)
2. What is the expected end state for the project? Work plans are expected to discuss details about the end-state goals for the site.
3. A meeting to satisfy I-5 requirements was not conducted for this project. Consistent with discussions among the FFA parties, DOE was to satisfy this FFA requirement on a building-specific basis.
4. Please provide TDEC with the appropriate contact for coordinating additional environmental monitoring, as necessary.

Specific Comments:

1. Page 2, second paragraph, first sentence
Including pictures of this concrete collection ditch surrounding the coal pile would provide beneficial perspective to the challenge of protecting it during demolition. The discussion regarding the end state of the ditch should also be included.
2. Page 2, second paragraph
The document should further discuss the piping that was installed in this facility but not brought into operation. For example, was the piping ever connected to any equipment/components that could have potentially transferred contamination?
3. Page 7, Project Description
The work plan should provide further details and end states on the referenced basements, wind tunnels, and sumps that will be left in place.
4. Page 7, bulleted list
There is no specificity to the scope elements associated with this action. On page 1 (third paragraph, last sentence), text indicates that this work plan should provide the project details for the action. Specific topics that should be addressed include, but are not limited to, the following:

- a. Hazardous materials that are to be removed,
 - b. Describing the site stabilization plan,
 - c. Listing all equipment and piping that will be removed,
 - d. Designating the parts of the facility that require decontamination,
 - e. Outlining the structural and architectural components that will be demolished.
5. Page 8, Demolition Approach
This general sequence of work is missing components relevant to work plans, including the following:
 - a. Site preparation details, such as:
 - i. Installation of temporary facilities and utilities
 - ii. Site access controls
 - b. Characterization activities
 - c. Storm drain baseline monitoring
 - d. Stormwater runoff controls
6. Page 8, Demolition
If water is to be used for dust suppression during demolition activities, then the work plan should specifically discuss the plan for managing this accumulated water.
7. Page 8, Demolition, first bullet
Considering this was an active facility, more information should be provided to include details about piping that *was* operational and how it will be managed. The document provides no distinction between operational and non-operational piping (see piping referenced in Comment #2).
8. Page 8, Demolition, first bullet
The document should elaborate on the “standard” techniques and controls that will be used for demolition, such as:
 - a. How the building will be felled.
 - b. The application and location of a berm.
 - c. A description of the process and location that equipment will be downsized or segregated.
 - d. The plan for storm drain monitoring: baseline, rain event, and post-demolition.
9. Page 8, Post-Demolition, last two bullets
While the facility is classified as non-radiological and non-mercury, the document should include data to confirm it is not contaminated. A radiological survey and characterization of the slab before covering with debris is necessary – even if just to confirm it is not contaminated.
10. Page 9, fourth paragraph
The document should include more details regarding storage practices and how accumulated water that comes into contact with debris piles will be managed.

11. Page 10, Surface Water Monitoring

The document should provide further details of water management and environmental monitoring to address potential water runoff concerns with this project. A commitment should be included to protect all storm drains that could possibly be impacted by this demolition.

12. Page 11, Provisional Management

The document should include a commitment that provisional management requirements will be identified in the Phase Construction Completion Report.

Questions or comments concerning the contents of this letter should be directed to Cody Juneau at the above address or by phone at (865) 314-2328.

Sincerely

Randy Young Digitally signed by Randy Young
Date: 2024.07.15 08:39:32 -04'00'

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

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