



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

RECEIVED
SEP 26 2024
COUNTY MAYOR'S OFFICE

September 25, 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

TDEC Approval: Remedial Design Work Plan (RDWP) for the Environmental Management Disposal Facility (EMDF), Oak Ridge, Tennessee (DOE/OR/01-2971&D2)

Dear Mr. Petrie

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation - Oak Ridge Office, has reviewed the document cited above under the [Federal Facility Agreement \(FFA\) for the Oak Ridge Reservation \(ORR\)](#). TDEC acknowledges that the changes made to this document appropriately address the response to comments from the [D1 RDWP](#) and approves the D2 document with the following clarifications.

- 1) TDEC expects the Environmental Management Disposal Facility (EMDF) to have a detection monitoring network consisting of groundwater monitoring wells in accordance with Applicable or Relevant and Appropriate Requirements (ARARs). While TDEC notes that the wording on p. x was revised to include surface water locations in response to a U.S. Environmental Protection Agency comment, this approval does not imply that TDEC would accept surface water monitoring as a substitute for properly placed groundwater wells, including those screened in shallow bedrock along geologic strike from the landfill.
- 2) The schedule in Section 4 (p. 31) projects completion of the first Groundwater Field Demonstration (GWFD) monitoring season in March/April 2025. While the [Record of Decision \(ROD\)](#) states that groundwater levels will be measured "through March or April" (p. 2-89), TDEC's review of data the U.S. Department of Energy (DOE) has collected at EMDF indicates the highest water levels may occur during April. Therefore, the monitoring season must extend through April, even if the project team begins evaluating preliminary results earlier.

- 3) TDEC also requests that DOE include the commitment in the response to General Comment 1 (discussions on the monitoring of groundwater levels at EMDF) as a project team action item to ensure it is addressed at the appropriate time.

Questions or comments concerning the contents of this letter should be directed to Brad Stephenson at the above address, by phone at 865-352-1235, or by e-mail at brad.stephenson@tn.gov.

Sincerely

Randy Young

Digitally signed by Randy
Young
Date: 2024.09.24 07:54:41
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Randy C. Young
FFA Project Manager
Division of Remediation – Oak Ridge Office

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