



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

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COUNTY MAYOR'S OFFICE

September 30, 2024

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

Dear Mr. Petrie

RE: Transmittal of the Waste Handling Plan for the Demolition of the Beta-1 Complex Located at the Y-12 National Security Complex, Oak Ridge, Tennessee (DOE/OR/01-2883&D1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on July 2, 2024. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. The following comments are relevant to that review:

- 1. Page 16, 2nd paragraph.** This paragraph discusses that 23 samples collected during pre-demolition characterization activities were used to supplement the Environmental Management Waste Management Facility (EMWMF) data set for waste lot 315.1. From the information included in Appendix C, Data Quality Objectives for Pre-Demolition Waste Characterization, it is not possible to identify where or from what components the supplemental samples were collected. This Waste Handling Plan (WHP) should identify the specific characterization data collected and used to develop waste lot 315.1.
- 2. Page 16, 3rd paragraph, 3rd bullet.** Please explain why this sample location was canceled, considering that condensate piping from 9404-17 was found to contain mercury after removal. How were lessons learned from that project factored into the assessment?
- 3. Page 29, 1st and 2nd paragraphs.** The first paragraph states that demolition waste from Beta-1 will be categorized as polychlorinated biphenyl (PCB) bulk product waste, while the second paragraph says that demolition waste will be considered PCB remediation

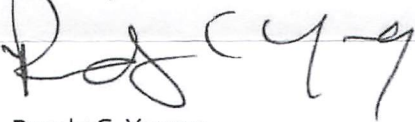
waste. Please clarify the conflicting designations for the PCB waste streams that occur throughout the document.

4. Appendix A, Sampling and Analysis Plan, page 22, 2nd paragraph, last sentence.

This sentence says that further characterization is needed to determine if a specific drainpipe is anomalous to the EMWMF waste lot. Please ensure that the final determination is included in the WHP.

Review of this document meets the review cycle protocol of 90 days. Questions or comments concerning the contents of this letter should be directed to Angel Perkey at the above address or by phone at (865) 985-6851.

Sincerely



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

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