



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

October 16, 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/R1)**

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation-Oak Ridge Office, received the above referenced letter from the U.S. Department of Energy (DOE) on September 16, 2024. The document has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation.

TDEC understands the scope of this subject work plan has already been initiated. Moving forward, DOE should provide enough time in future project schedules to gain tri-party input to finalize these work plans before initiating the work. Similarly, DOE should ensure time is available in the schedule for a site tour for a given scope of work.

Positively, TDEC worked with DOE following the first submittal of this Removal Action Work Plan to address initial comments and requests. While many concerns were discussed and a path forward was agreed to in this case, some of the issues are worth noting again to consider for future projects.

If there is a considerable gap of time (multiple years) between project actions, it is beneficial to conduct a scoping meeting to ensure all parties are aware of the proposed work plan and remaining concerns. It would also be beneficial to have sampling data and waste assessments be reviewed specifically for the proposed facility set for demolition, as opposed to grouping a data set for multiple facilities.

TDEC maintains that project-specific storm drain sampling and radiological surveys of the slab should be conducted for the demolition of all facilities included in Appendix C of the FFA. If DOE chooses to not conduct this sampling, TDEC should be given the opportunity to sample according to the demolition schedule. Coordination of sampling opportunities and a facility site tour was difficult due to the expedited and unreliable demolition schedule for this facility.

TDEC looks forward to working with both DOE and the U.S. Environmental Protection Agency to develop and document FFA remediation activities at the plant site. 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 C. Young  
FFA Project Manager  
Division of Remediation – Oak Ridge Office

ec: Samantha Urquhart-Foster – EPA  
Jason Poe – EPA  
Cathy Amoroso – EPA  
Brian Henry – DOE  
Morgan Carden – DOE  
Sam Scheffler – DOE  
Erin Sutton – DOE  
Tanya Salamacha – UCOR  
Rhonda Butler – UCOR  
Sid Garland – UCOR  
Howell Estes – CNS  
Jane Nations – CNS  
Michelle Kunz – CNS  
Chloe Ashley – NNSA  
Mark Shirley – NNSA  
ORSSAB  
OREM Mailroom  
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Dana Casey - TDEC

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Terry Frank - ORRCA  
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