



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Remediation - Oak Ridge  
761 Emory Valley Road  
Oak Ridge, Tennessee 37830

RECEIVED  
OCT 29 2024  
COUNTY MAYOR'S OFFICE

October 28, 2024

Mr. G. Chuck Smolens  
Assistant Manager for Environment  
Safety, Health, and Quality  
Y-12 Field Office  
Post Office Box 2050  
Oak Ridge, Tennessee 37831-8009

**TDEC Approval: Request for Addition of 25 Mixed Waste Containers to Table 3.6 of the Site Treatment Plan (STP) for Mixed Wastes on the U.S. Department of Energy (DOE) Oak Ridge Reservation (ORR)**

Dear Mr. Smolens

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation - Oak Ridge Office (DoR-OR) has reviewed the request submitted by Consolidated Nuclear Security (CNS) on September 27, 2024, (attached to this letter) to add 25 mixed waste containers to Table 3.6 of the Site Treatment Plan (STP) for Mixed Wastes on the U.S. Department of Energy Oak Ridge Reservation.

TDEC acknowledges the challenges presented by the recent noncompliance issues at the Perma-Fix facilities. In consideration of the lack of commercial capacity for disposal at other facilities and the well-characterized, stable condition of the 25 mixed waste containers, TDEC approves the addition of these containers to the STP. The proposed milestones outlined in the request are acceptable. As such, the following milestones are approved to be incorporated into the Annual Update of the STP:

- **Milestone 1:** *Verification of corrective actions at DSSI by March 31, 2025.*
- **Milestone 2:** *Resumption of shipments to Perma-Fix facilities by June 30, 2025.*
- **Milestone 3:** *Completion of shipment of 25 mixed waste containers by September 30, 2025.*

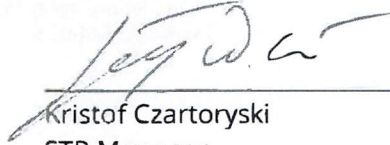
Thank you in advance for keeping TDEC informed of progress toward these milestones and for notifying us of any significant changes to the schedule or the condition of the waste.

If there are any questions, please do not hesitate to contact Revendra Awasthi at [Revendra.Awasthi@tn.gov](mailto:Revendra.Awasthi@tn.gov) or by phone at 865-306-1862; or Kristof Czartoryski at [Kristof.Czartoryski@tn.gov](mailto:Kristof.Czartoryski@tn.gov) or by phone at 865-250-9705.

Respectfully



Revendra Awasthi  
STP Coordinator  
Division of Solid Waste Management



Kristof Czartoryski  
STP Manager  
Division of Remediation - Oak Ridge Office

Enclosure

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COPY

September 11, 2024

Mr. G. Chuck Smolens  
Assistant Manager for Environment,  
Safety, Health and Quality  
Y-12 Field Office  
Post Office Box 2050  
Oak Ridge, Tennessee 37831-8009

Dear Mr. Smolens:

**Contract DE-NA0001942, Request to Add Y-12 National Security Complex Mixed Waste Liquids and Solids to the Oak Ridge Reservation Site Treatment Plan**

In accordance with Paragraphs 1.3.3 and 2.2.1 of the *Site Treatment Plan for Mixed Wastes on the U.S. Department of Energy Oak Ridge Reservation*, Consolidated Nuclear Security (CNS) is requesting the addition of 25 mixed waste containers to Table 3.6 of the Site Treatment Plan (STP). The waste consists of mixed waste liquids and solids contaminated with depleted uranium generated from the cleanout of process equipment at the Y-12 National Security Complex. These containers were originally planned for shipment to the Perma-Fix of Florida (PFF) facility in Gainesville, Florida, and the Perma-Fix Diversified Scientific Services (DSSI) facility in Kingston, Tennessee. However, a decision was made by CNS to suspend shipments to all Perma-Fix facilities due to recent noncompliance issues at the DSSI facility. There is currently no commercial capacity for disposal of this waste other than PFF and DSSI.

The 25 containers listed below represent the inventory.

Y122300282	Y122300284	Y122300408	Y122300472	Y122300476
Y122308640	Y122308641	Y122308642	Y122308643	Y122308644
Y122308645	Y122308646	Y122308647	Y122308648	Y122308649
Y122308650	Y122308651	Y122308652	Y122308653	Y122308655
Y122308656	Y122308657	Y122308658	Y122308659	Y122308660

These containers are 55-gallon steel drums and 330-gallon polyethylene tanks with a combined weight of approximately 7,800 kilograms. They are managed as mixed waste with accumulation start dates ranging from September 13, 2023, to October 27, 2023. The waste forms are stable and stored in compatible containers in good condition, and in a permitted hazardous waste storage area. The waste is fully characterized and has one or more of the following Environmental Protection Agency waste codes: D002, D006, D007, D008, D010, D023, D024, D025, D030, D032, D033, D034, D036, D037, D038, D041, D042, and D043. CNS proposes to add 21 items, weighing 7670.4 kg, of mixed waste liquids, and 4 items, weighing 124.3 kg, of mixed waste solids.

The suspension of waste shipments to all Perma-Fix facilities will be lifted once the evaluation of the corrective actions at the DSSI facility by CNS is complete. Lifting the suspension will allow

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these containers to be thermally treated at PFF or stabilized at DSSI in compliance with Land Disposal Restrictions treatment standards appropriate for the waste type.

We believe that the completion of corrective actions at the DSSI facility, as well as evaluation of the resolution by CNS, will extend beyond the one-year storage time limit. As a result, we are making this request to add them to the STP. The following targets and milestones are proposed:

- Milestone: Verify resolution of corrective actions at DSSI by March 31, 2025
- Milestone: Resume shipments to all Perma-Fix facilities by June 30, 2025
- Milestone: Complete shipment of 25 mixed waste containers by September 30, 2025

If you have any questions, please contact Stacey Loveless at 865.576.9657.

Sincerely yours,

**Diane  
McDaniel**

Digitally signed by Diane  
McDaniel  
Date: 2024.09.11  
09:06:25 -04'00'

Diane R. McDaniel, Senior Director  
Y-12 Environment, Safety and Health

DRM:bes

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EC DMC – 1971316.1613 – RC