



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

RECEIVED
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COUNTY MAYOR'S OFFICE

February 20, 2025

Ms. Abby Hill
Quality and Mission Support Division
Oak Ridge Office for Environmental Management
U.S. Department of Energy
P.O. Box 2001
Oak Ridge, TN 37831

Dear Ms. Hill

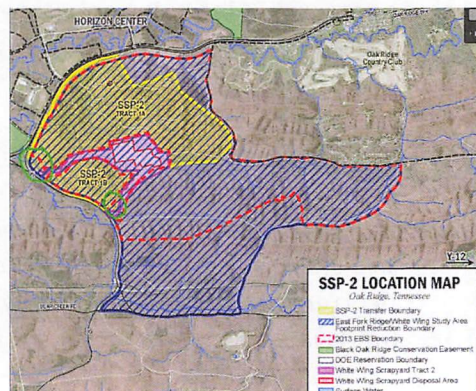
RE: Environmental Baseline Survey Report for Clean Parcel Determination for Self-Sufficiency Parcel 2 in the Vicinity of the East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2987)

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation, Oak Ridge Office (DoR-OR) is in receipt of the U.S. Department of Energy (DOE) letter dated January 15, 2025, transmitting the above referenced document. DoR-OR received the transmittal the same day. The Comprehensive Environmental Response, Compensation, and Liability Act does not provide TDEC with concurrence or approval authority for a Clean Parcel Determination (CPD). Nevertheless, TDEC appreciates the opportunity to offer the following comments for consideration:

1. The approved 2013 Environmental Baseline Survey Report (2013 EBS) resulted in an all-media no-further-investigation (NFI) determination for Parcel 4a which encompasses the Self-Sufficiency Parcel 2 (SSP-2). The 2011 Sampling and Analysis Plan/Quality Assurance Project Plan (2011 SAP) documents the use of surface water as a proxy for groundwater since groundwater was assumed to be unimpacted by the nearby White Wing Scrap Yard (WWSY) as explained in responses to TDEC comments on the 2011 SAP. Sampling results did indicate the presence of contaminants from WWSY as stated in the 2013 EBS. In recent years, groundwater monitoring wells were installed at WWSY, and sample results indicate groundwater contamination is present. To date, vertical and horizontal extents of groundwater plumes have not been delineated. Information gathered from groundwater investigations following the 2013 EBS challenges the validity of underlying assumptions used to make the all-media NFI determination. The lack of necessary information regarding the nature and extent of groundwater contamination leads to uncertainty as to whether impacted groundwater has migrated beneath the SSP-2

parcel. Does DOE consider this level of uncertainty acceptable to proceed with transferring SSP-2 under a CPD?

2. The discussion of WWSY in Section 2 and Section 4.4.3 should include a summary of groundwater impacts with a list of contaminants that are found at concentrations above their corresponding maximum contaminant level.
3. The former FFA site, McNew Hollow Research Area, is located immediately adjacent to ET-3. The figures in this report should identify the exact locations of the animal pens to confirm that these areas do not fall within the proposed SSP-2 land transfer boundary.
4. The SSP-2 transfer footprint illustrated in Figure 1.2 shows areas that were not included in the 2013 EBS (circled in green). All land considered for a CPD should be assessed in the EBS. TDEC acknowledges the area along ET-3 coincides with the approximate location of the McNew Hollow Research Area. DOE should discuss in the EBS how potential environmental liabilities in these areas will be addressed during the property transfer process.



This letter meets the requested review and comment date of February 28, 2025, for the subject document. Questions or comments concerning the contents of this letter should be directed to Randy Hoffmeister at the above address or by phone at (865) 985-2513.

Sincerely

Randy Young Digitally signed by Randy Young
Date: 2025.02.19 14:23:36 -05'00'

Randy C. Young
FFA Project Manager
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