



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

April 21, 2025

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

RE: Approval of DOE's Proposed Federal Facility Agreement Appendix J

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office (DoR-OR), has completed review of the above referenced submittal pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation (ORR). The document was originally received on March 28, 2025, and TDEC offered comments to the U.S. Department of Energy (DOE) in a letter dated April 4, 2025. DOE has provided feedback to the TDEC comments, but the requested modifications have not been made.

However, instead of initiating a formal FFA dispute at this time as prescribed by the FFA for such a situation, TDEC chooses to move forward and finalize this Appendix J submittal while continuing long-term planning discussions with DOE over the next year. It is expected that most of the TDEC concerns can be addressed in a later modification. Therefore, the DOE Appendix J submittal for 2025 is approved.

For the CERCLA/FFA record, the original TDEC comments can be summarized as:

- Several individual D&D projects at the Y-12 site (9720-17, Dike 34 SWMU Tanks, 9401-3, and 9401-1) do not have a planned completion milestone. TDEC reiterates its recommendation for removal actions to be implemented and completed as the necessary work plans are finalized. The requested Phased Construction Completion Report milestones would help assure project plans are implemented in a timely manner versus being delayed and possibly requiring updates to previously developed work plans.
- Milestones are needed for characterization and possible remediation of soils underneath the Beta-1 facility within EU-4. TDEC maintains the preference to characterizing and remediating such soils as they become accessible and prior to the

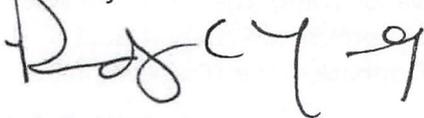
site being reused as stipulated within the UEFPC Phase II IROD. TDEC is currently in discussions with both DOE and EPA to develop and finalize a process to more expeditiously focus on areas identified for reuse which support both remediation needs and the changing missions at the Y-12 facility. It is TDEC's expectation that this process will be better defined over the next year allowing for the requested milestones to be included within next year's update of Appendix J.

- Lastly, Five-Year Review milestones should include a description of the specific scope of the particular annual submittal. Such detail will provide needed detail for users of Appendix J. During discussions of TDEC's comments, DOE has seemed willing to provide the requested additional information. TDEC expects these changes are adopted during future revisions of Appendix J.

DOE's original submittal acknowledged expected changes to Appendix J as current contract negotiations for future scopes of work are completed. TDEC looks forward to continued collaboration with the FFA parties to continue refinement of outyear remediation plans. The FFA parties should make necessary efforts to develop a complete Appendix J that represents FFA tri-party plans for complete cleanup of the ORR.

Questions or comments concerning the contents of this letter should be directed to Randy Young at (865) 310-1157.

Sincerely



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

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