



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

RECEIVED
MAY 15 2025
COUNTY MAYOR'S OFFICE

May 13, 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: Phased Construction Completion Report for Exposure Unit Z2-35 in Zone 2, East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2992&D1)

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 February 25, 2025, transmitting the above referenced document. DoR-OR received the transmittal the same day. TDEC has completed a review of the document pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation and offers the following comments:

1. **Page 21, Section 4, first paragraph and Page 24, Table 2**
The first paragraph states that of the numerous Zone 2 Soils ROD criteria exceedances (shown in Table 2), a majority are within the K-1407-B Holding Pond below the shallow water table. Please confirm whether some or all 59 groundwater SSL exceedances for Tc-99 are from within the saturated soils of the K-1407-B Pond and will be addressed under the Main Plant Final Groundwater ROD. For clarity, TDEC requests that a vadose zone soil characterization table and associated text be added to the document.
2. **Page 21, Section 4, RA 3 bullet**
The sample locations discussed in the four dashed subsections are incorrectly grouped into the three excavation areas. Please address the discrepancies here and globally, as needed.

3. **Page 29, Section 4, first paragraph**

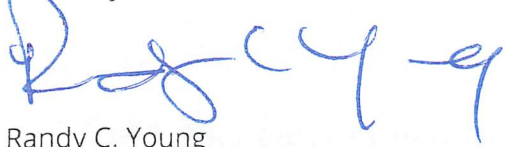
Please state in the paragraph that "any action related to soil contamination in saturated soils within the K-1407-B Holding Pond will be addressed under the Main Plant Final Groundwater ROD."

4. **Page 46, Section 5.2.2, first paragraph**

The first sentence states fifteen wall confirmation samples were collected from the RA 2 excavation, but only twelve wall confirmation samples are identified in Table 8. Please address this discrepancy.

This letter meets the FFA review cycle protocol of 90 days for the subject document. TDEC looks forward to working with DOE to ensure timely resolution of these comments. 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 C. Young
FFA Project Manager
Division of Remediation - Oak Ridge Office

ec: Mark McIntosh, DOE
Sam Scheffler, DOE
Samantha Urquhart-Foster, EPA
Constance Jones, EPA
Tanya Salamacha, UCOR
Sid Garland, UCOR
OREM Mailroom
ORSSAB

xc: Wade Creswell, ORRCA
Amy Fitzgerald, ORRCA
Terry Frank, ORRCA
Warren Gooch, ORRCA

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