



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

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COUNTY MAYOR'S OFFICE

May 29, 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: Addendum to the Phased Construction Completion Report for Exposure Unit Z2-30 in Zone 2, East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2521&D2/A1)**

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 March 3, 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:

**General Comments**

1. Fire training facilities are known to use per- and polyfluoroalkyl substances (PFAS)-containing aqueous film-forming foam (AFFF) as a type of fire-suppressant. Has PFAS sampling been conducted in the K-1045-A area to determine if these chemicals persist in nearby soil? Since one of the goals of this Phased Construction Completion Report (PCCR) Addendum is a no further action (NFA) recommendation for all 11.86 acres of Exposure Unit (EU) Z2-30, please include language explaining how PFAS were evaluated for risk and threats to groundwater.
2. To evaluate the appropriateness of an NFA determination recommended in this PCCR Addendum, TDEC requests DOE provide the referenced data quality objective (DQO) Scoping Package for Z2-30 (BJC/OR-3230) and the concurrence forms listed in Section 7, Table 11 of the Z2-30 PCCR (DOE/OR/01-2521&D2).
3. The EU Z2-30 groundwater evaluation included in Section 2.2.5 of the Dynamic Verification Strategy Technical Memorandum (Z2-30 PCCR Appendix A) documented numerous maximum contaminant level (MCL) exceedances for several contaminants

including dioxins/furans. Since one of the goals of this PCCR Addendum is an NFA recommendation for all 11.86 acres of EU Z2-30, please include language explaining how dioxins/furans were evaluated for risk and threats to groundwater.

**Specific Comment**

1. **Page 34, Section 4, Threat to groundwater investigation bullet**

The text states that groundwater soil screening level (SSL) exceedances at locations Z2-EU30-200 and Z2-EU30-201 are now below the estimated depth of the water table following site recontouring of K-1070-B. Please add text with supporting data (from specific wells/piezometers) used to evaluate the depth of the water table and to make the assertion that the depths of the exceedances are below the water table.

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 Young**

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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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