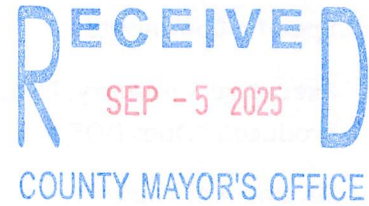




STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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



September 2, 2025

Mr. Roger Petrie
U.S. Department of Energy
Oak Ridge Office of Environmental Management
Post Office Box 4067
Oak Ridge, TN 37831

Dear Mr. Petrie

TDEC Comment Letter for the Removal Action Work Plan for North Tributary-8 Removal Action at the Bear Creek Burial Grounds, Oak Ridge, Tennessee (DOE/OR/01-3007&D1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, received the above referenced submittal on June 27, 2025. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. TDEC provides the following comments:

General Comments

- 1) It is stated throughout the document that the contingent ARARs presented in the Action Memorandum are not applicable due to the NT-8 being identified as a wet weather conveyance. This conflicts with statements made in multiple sections of the hydrologic determination included in Appendix B such as:

Appendix B, Section 3.0 Resource Description:

"The watercourse would be considered a wet weather conveyance if these were under normal conditions, but the primary field indicator of flowing water in channel (mostly subsurface) and 7 days since last precipitation over 0.1 inches in local watershed is indicative of a stream in the overall hydrologic determination."

Appendix B, Section 5.0 Results:

"NT-8 tributary is a stream"

Please explain how the U.S. Department of Energy (DOE) plans to define NT-8 as a wet weather conveyance for the purposes of ARARs. If the plan is to define only part of the study reach as a wet weather conveyance, please update the hydrologic determination to clarify how the study reach will be split in compliance with state regulations.

- 2) Given the proposed cap is an engineered remedy, TDEC expects that professional as-built surveys will be provided with the Removal Action Report.

Specific Comments

Executive Summary, ES-1, Fourth Paragraph – It is stated here that “minimal waste will be produced.” Does DOE anticipate the need for a waste handling plan to complete this work?

Section 4.4, Page 4-5 – Does DOE expect any waste to be generated from cleaning and reconstruction of the swale?

Section 4.5, Page 4-5 – Please include a summary of the monitoring that will be planned as part of this removal action in this work plan.

Appendix B, Section 4.0, Page B-6 – The QHP certification referenced here does not appear to be the same QHP certification included as supplemental information. Please correct.

Review of this document meets the review cycle protocol of 90 days. Questions or comments concerning the contents of this letter should be directed to David Carlone at the above address or by phone at (865) 839-3362.

Sincerely

Randy Young Digitally signed by Randy Young
Date: 2025.09.02 10:53:41 -04'00'

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

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