



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

September 22, 2025

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

RECEIVED  
SEP 24 2025  
COUNTY MAYOR'S OFFICE

Dear Mr. Petrie

**RE: DOE'S Submittal of Appendix J Fiscal Year FY+3 Milestone Notification Letter**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office (DoR-OR), has reviewed the above referenced submittal pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation (ORR). The document was received on September 12, 2025.

The FFA parties have worked diligently over the past year to ensure project team discussions have supported consistent remediation progress across the ORR. TDEC agrees that the proposed milestones represent significant remediation progress across the ORR and supports the U.S. Department of Energy (DOE) proposal to include those milestones within the FFA.

However, the proposal fails to include the following planned activities for the ORR remediation effort.

- There is a lack of appropriate D&D milestones for Y-12 facilities such as 9720-17, 9401-3, and the Solid Waste Management Unit (SWMU) tanks within Dike 34. It is TDEC's understanding that these projects are planned and ongoing.
- There are no milestones proposed for the soil remediation actions at Y-12 which the FFA parties have discussed extensively. During the past year the FFA parties have recognized the need for necessary soil remediation work at the Alpha-2 and Beta-1 sites prior to site reuse activities beginning. TDEC again requests DOE to plan and execute soil remediation as buildings are demolished, soils become accessible as described in the Interim Record of Decision (IROD), and before future site users begin developing the property. Near-term characterization and remediation of these soils will protect nearby surface and ground water resources and support site reuse for implementation of the specific DOE mission at the Y-12 site.

- Milestones have been pushed out six to seven years for some D&D work at the Oak Ridge National Laboratory (ORNL). As has been discussed in the past, TDEC strongly discourages the time and investment to develop and complete work plans only to delay the work for an extended period of time. Such an approach increases the likelihood of necessary updates to the plans which is needless duplication of effort.
- The ORNL Bethel Valley Groundwater Phase I Remedial Investigation Report is proposed to move out three years without an accompanying explanation or rationale.

Therefore, TDEC does not concur with the Appendix J submittal at this time but does recognize the significant tri-party collaboration within the proposal to represent current remediation plans for most projects. TDEC requests a meeting among the FFA parties to discuss the specific project plans listed above and expects a complete set of Fiscal Year 2028 milestones that all three parties can support.

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

Sincerely

**Randy Young** Digitally signed by Randy Young  
Date: 2025.09.22 10:28:18 -04'00'

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

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