



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

September 30, 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

Dear Mr. Petrie

**RE: TDEC's Concurrence with the DOE 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 U.S. Department of Energy (DOE) met with the TDEC on September 29, 2025, to discuss TDEC comments that were transmitted to DOE on September 22, 2025. Based on the discussions at that comment resolution meeting and the extensive discussions among the FFA parties over the past year to assure actual planned FFA remediation activities are clearly represented within the FFA Appendices E and J, TDEC approves the current proposed modifications to the Fiscal Year 2028 milestones which are planned to roll into the FFA Appendix E in early October 2025.

As discussed on numerous occasions with DOE and the U.S. Environmental Protection Agency, TDEC notes the following interests that the FFA parties should address moving forward:

- Currently, there are a lack of appropriate D&D milestones for Y-12 facilities such as 9720-17, 9401-3, and the Solid Waste Management Unit tanks within Dike 34. It is TDEC's understanding that some of these projects are being performed by the National Nuclear Security Administration (NNSA) for the Oak Ridge Environmental Management (OREM) program, and neither of these DOE entities is willing to commit to milestones for work that is already planned. The current approach of *not* establishing milestones for planned remedial actions on the ORR seems inconsistent with the ORR FFA. The FFA parties should continue working to resolve this inconsistency.
- 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, 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. Based on the most recent discussions with DOE, those specific plans are being developed and associated milestones will be added later.

- The submittal does not include any milestones to complete the Y-12 Outfall 200 Mercury Treatment Facility (OF200MTF) project to support planned removal and remedial actions at the Y-12 site as committed to in the *Amendment to the Record of Decision for the Interim Source Control Actions in the Upper East Fork Poplar Creek Characterization Area, Oak Ridge, Tennessee, Water Treatment at Outfall 200 (DOE/OR/01-2697&D2)*. The treatment of mercury contamination entering the headwaters of Upper East Fork Poplar Creek (UEFPC), exiting the DOE site, and negatively impacting the downstream sections of EFPC have been recognized by the FFA parties. Because the Remedial Action Report milestone for this project was missed, the project is currently in informal dispute under the FFA, and the critical nature of this project in supporting future remediation within the UEFPC watershed, TDEC strongly encourages DOE to appropriately milestone the completion of the OF200MTF project.

In summary, TDEC concurs with the DOE Appendix J submittal at this time but does recognize and note remaining issues the FFA parties should work to resolve. 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  
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Randy C. Young  
FFA Manager

Division of Remediation – Oak Ridge Office

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