



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

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COUNTY MAYOR'S OFFICE

October 31, 2025

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

**RE: Transmittal of the Federal Facility Agreement Appendix I-5 Information Assessment
for Upper East Fork Poplar Creek and Bear Creek Valley, Oak Ridge, Tennessee
(DOE/OR/01-3014&D1)**

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation- Oak Ridge Office, received the above referenced submittal on August 4, 2025. The document has been reviewed pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation (ORR).

General Comments

1. Appendix C includes active Y-12 National Security Complex (Y-12) facilities currently operated under the National Nuclear Security Administration's (NNSA) Y-12 Field Office (YFO). Considering the dynamic and critical mission of Y-12, the U.S. Department of Energy (DOE) should confirm that all entities have collaborated on this effort to ensure there is no possibility of finding unanticipated material when these active facilities are decommissioned in the future.
2. As mentioned in specific comments below, the list of potential contaminants provided in this document is incomplete. TDEC requests either an explanation of the abbreviated list, or a meeting with the FFA tri-parties to further discuss the list of potential contaminants.
3. All Waste Handling Plans relevant to Y-12 and Bear Creek Valley projects should continue to include the agreed-upon language from the Y-12 Project Team Meeting that occurred on February 27, 2024. This agreement was captured in the attached material titled "ORNL & Y-12 Project Team Guidance – Appendix I-5 (AppendixI5guidance)".

Specific Comments

1. **Page 1, third paragraph, second sentence**
This statement should be edited to include language acknowledging "at the time this is submitted" or "no current research shows".
2. **Page 1, fourth paragraph**
TDEC requests for the following sentence to be added at the end of this paragraph: "As projects get initiated, EPA and TDEC maintain the right to request an I-5 meeting to discuss any I-5 concerns."
3. **Page 2, Table 1**
Please explain why this listing does not include radionuclides, volatile organic compounds (VOCs), or semi-volatile organic compounds (SVOCs).
4. **Page 3, Table 2**
The listing of chemicals does not include isotope information. Table 2 uses "preliminary remediation goal (PRG)" in column 2. PRGs are for radionuclides, but no radionuclides are listed in the Table.
5. **Page 3, Table 2**
There are Site-Related Contaminants associated with the Bear Creek Valley Burial Grounds Remedial Investigation Work Plan that are not included in this list, such as Strontium and Thorium. Please explain why these are not included in this list that is meant to cover Bear Creek Valley projects.
6. **Page 4, first paragraph**
Chromium (VI) is listed in the paragraph as not having a comparative analytical criterion. Chromium (VI) has Ambient Water Quality Criteria (AWQCs) as listed in Table 1. In addition, chromium (VI) has a Maximum Contaminant Level (MCL) by proxy of the total chromium MCL for drinking water. Please remove this contaminant from this list in the paragraph.
7. **Appendix B, Table B.1**
This table primarily focuses on metals analysis. Please note that some contaminants have a metal toxicity component and a radiological component. As an example, uranium is a known toxic metal but is also an alpha emitter. If radionuclides are meant to be included, both risk pathways should be evaluated. If the intent is to limit this to chemicals, any reference to PRGs should be removed. If the intent is to encompass radionuclides as well, a table should be added for isotopes and their PRGs listed separately from the chemicals and regulatory screening levels.

Questions or comments concerning the contents of this letter should be directed to Cody Juneau at the above address or by phone at (865) 314-2328.

Sincerely



Eileen Marcillo
FFA Project Manager
Division of Remediation - Oak Ridge Office

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