



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

November 12, 2025

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

RECEIVED
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COUNTY MAYOR'S OFFICE

Dear Mr. Petrie

RE: Addendum 4 (Exposure Unit Z2-11) to the Fiscal Year 2009 Phased Construction Completion Report for Zone 2 Exposure Units 11, 12, 17, 18, 29, and 38 at East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-2415&D2/A4)

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 September 17, 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:

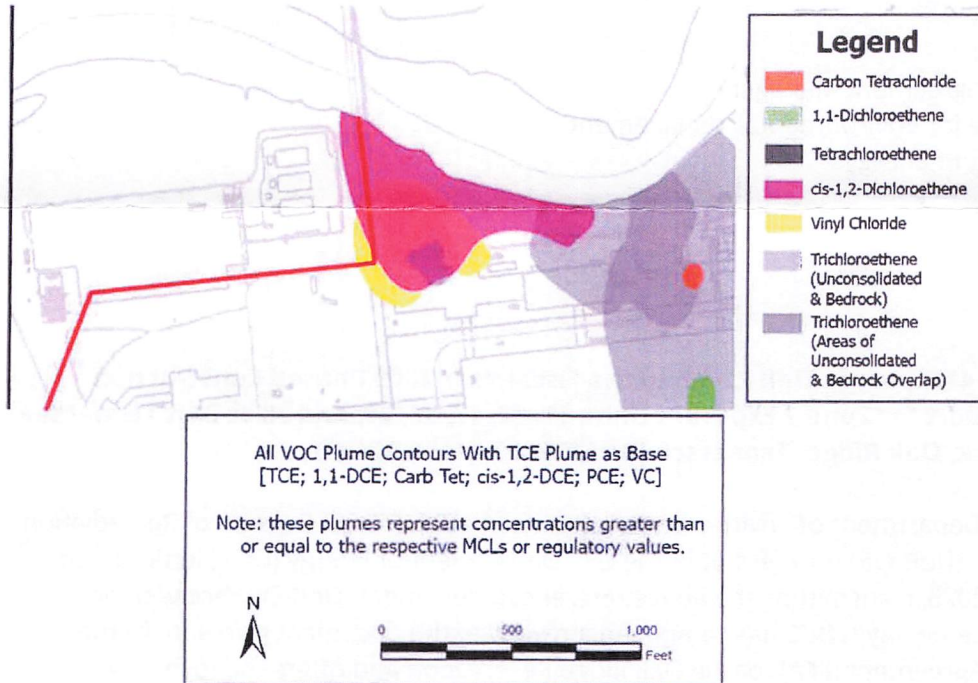
1. **Page 47, Table 7**

Please correct the Chromium Groundwater SSL from 100 mg/kg to 172 mg/kg.

2. **Page 51, Section 6**

As part of the pre-RIWP sampling effort by the ETP groundwater team, many wells throughout the main plant area were re-sampled and re-evaluated for synoptic groundwater levels to produce more accurate groundwater flow maps. Results from this effort were used to redraw plume maps. While it is understood that these plume maps are approximated, it is important to note that the nature and extent of these plumes have not been defined, and uncertainty exists with respect to understanding the extent of groundwater contamination within EU Z2-11. The most recent plume map has identified volatile organic compound (VOC) contamination (e.g., trichloroethene, cis-1,2-dichloroethene, vinyl chloride, and carbon tetrachloride) in groundwater greater than maximum contaminant levels (MCLs) near the eastern boundary of EU Z2-11. Specifically, wells Z2-EU13B-1068P, Z2-EU13B-1066P, and Z2-EU13B-1064P, which are

within 100 feet of the EU Z2-11 boundary, yielded VOC results well above MCLs. Updated plume maps (see below) indicate plume expansion into EU Z2-11 on the eastern boundary. Please re-evaluate the vapor intrusion (VI) pathway by comparing the default and site-specific VI screening levels to the recent VOC results in EU Z2-13. Please update Section 6 as appropriate based on results of VI pathway re-evaluation.



3. **Page 61, Section 9**

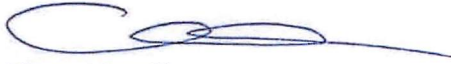
Please remove the text as stated, replace it with the following language, and include the reference in Section 10:

"The following LUC is required for EU Z2-11 in addition to those in the Zone 2 Soils ROD:

- Any existing and future enclosed building structure intended for occupation equal to or in excess of 8 hr per day will be evaluated and appropriately designed and constructed to minimize exposure to VOC vapors using Office of Solid Waste and Emergency Response 9200.2-154 Section 8.2.3, *OSWER Technical Guide for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Vapor Sources to Indoor Air*, as guidance."

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



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

ec: Mark McIntosh, DOE
Sam Scheffler, DOE
Brian Begley, EPA
Cathy Amaroso, EPA
Samantha Urquhart-Foster, 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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