



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

RECEIVED  
DEC 18 2025  
COUNTY MAYOR'S OFFICE

December 16, 2025

Mr. Roger Petrie  
Federal Facility Agreement Manager  
Oak Ridge Office of Environmental Management  
U.S. Department of Energy  
Post Office Box 4067  
Oak Ridge, Tennessee 37831-4076

Dear Mr. Petrie

**TDEC Extension Request: Federal Facility Agreement Review of Explanation of Significant Differences for the Record of Decision for the Disposal of Oak Ridge Reservation Comprehensive Environmental Response, Compensation, And Liability Act of 1980 Waste, Oak Ridge, Tennessee: Clean Water Act (DOE/OR/01-2972&D2)**

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation received the revised (D2) Explanation of Significant Differences (ESD) for review on December 8, 2025. The ESD is a primary document under the [Federal Facility Agreement for the Oak Ridge Reservation \(FFA\)](#).

The ESD adds Clean Water Act and associated regulations to the [Record of Decision \(ROD\)](#) for the Environmental Management Waste Management Facility (EMWMF). Addition of these applicable or relevant, and appropriate requirements (ARARs) supports compliant management of landfill wastewater. The revised ESD establishes discharge limits for radiological contaminants in landfill wastewater discharges to the Bear Creek and White Oak Creek watersheds, while it defers incorporation of effluent limits for chemical contaminants.

Pursuant to FFA Section XXI, this document is subject to a 30-day period for review and comment. The due date for TDEC review is January 7, 2025. TDEC requests to extend the due date by 30 days to February 6, 2025, pursuant to FFA Section XXX, *Extensions*. Granting the requested extension would not delay attainment of any scheduled FFA milestones.

Good cause for extension exists because the D2 ESD represents a substantial revision of the [D1 draft](#) submitted on [March 26, 2024](#). The D2 document incorporates revisions resulting from a series of collaborative meetings held since that time. Additional review is appropriate to ensure the revised document includes all state and federal regulations applicable to CWA pollutants, consistent with the U.S. Environmental Protection Agency (EPA) administrator's [dispute resolution decision](#) (December 31, 2020) and [follow-up correspondence](#) (January 19, 2021).

Questions or concerns regarding this letter may be directed to Brad Stephenson at the above address, by phone at 865-352-1235, or by e-mail at [brad.stephenson@tn.gov](mailto:brad.stephenson@tn.gov).

Sincerely

**Eileen Marcillo** Digitally signed by Eileen Marcillo  
Date: 2025.12.11 11:58:57 -05'00'

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

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