



**STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION**

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

RECEIVED
DEC 26 2025
COUNTY MAYOR'S OFFICE

December 23, 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

DOE Submittal of Proposed Changes to the Federal Facility Agreement for the Oak Ridge Reservation: Appendix C, Oak Ridge Remediation Sites, and Appendix B, Oak Ridge Site Description

The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation-Oak Ridge Office, has reviewed the above referenced submittal pursuant to the Federal Facility Agreement (FFA) for the Oak Ridge Reservation (ORR). The submittal was received on November 26, 2025. The following comments are relevant to this review:

General Comments

1. Many of the areas listed in the modification are being moved within appendices due to approved no further action (NFA) determinations. The FFA parties should discuss these sites to confirm these NFA determinations were not associated with interim actions or removal actions.
2. Revise all references to Records of Decision (RODs) to interim RODs (IRODs) as appropriate.
3. TDEC compared the RCRA Corrective Action Permit 164 with the proposed Appendix C and identified several non-operational solid waste management units (SWMUs) and areas of concern (AOCs) that appear to not have been included in Appendix C or Appendix B. TDEC requests a meeting to further discuss the omission of select SWMUs and AOCs in this revision.
4. TDEC requests additional information about the status of the K-1065 Hazardous Waste Storage Units (K-1065-A, K-1065-B, K-1065-C, K-1065-D, K-1065-E, K-1065-F, and K-1065-H) that were in the expired RCRA Permit TNH-165.
5. Are all the groundwater plumes identified in the 2014 Groundwater Strategy document included in Appendix C?

Specific Comments

1. Please add the Process Waste Treatment Line Leak near Solid Waste Storage Area 1 to Appendix C.
2. Page 4, Appendix C Revision Table – The *Removal Action Work Plan for the Beta-4 Complex Pre-Demolition* (DOE/OR/01-2479&D1/A17/R1) contains a table (Table 1, page 3) of tanks included in Appendix C. While all tanks in the table were not listed in Appendix C at the time the document was submitted, it was agreed that the remaining tanks would be included in the next Appendix C update. All remaining tanks from that table were included in this proposed change except for “Tanks and Transfer Station (in Building 9204-4)/YS-234”. This proposed change to Appendix C should include YS-234 or an appropriate explanation of why it is excluded.
3. Page 3, Appendix C – The decision document listed for the K-720 Fly Ash Pile (SWMU R045) is the ROD dated November 8, 2002. Remediation of the K-720 Fly Ash Pile was deferred to a future groundwater decision document, please update this entry accordingly. Please ensure that all areas not completed under the ETPP Zone 1 and Zone 2 Soils RODs that were deferred to a future decision document are listed in Appendix C.
4. Page B-46 – The referenced document (DOE/OR/01-1873/V1&D2/A5/R1) for the Bear Creek wetlands banking tracking does not appear to be in DOEIC. Please confirm that this is the correct document number and add it to the DOEIC if necessary.
5. Page B-47 – The referenced document (DOE/OR/01-1873/V1&D2) for the Bear Creek wetlands banking tracking does not appear to be in DOEIC. Please confirm that this is the correct document number and add it to the DOEIC if necessary.

TDEC looks forward to working with the FFA parties to discuss the topics above and allow the approval of the proposed modification. Questions or comments concerning the contents of this letter should be directed to Eileen Marcillo by phone at (865) 985-2397 or by email at eileen.marcillo@tn.gov.

Sincerely

Eileen Marcillo

Digitally signed by Eileen
Marcillo
Date: 2025.12.22 14:07:35 -05'00'

Eileen Marcillo
FFA Project Manager
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