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

February 19, 2026

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: Supplemental Sampling and Analysis Plan for the Remedial Investigation of Remaining Ecology/Surface Water/Sediment at East Tennessee Technology Park, Oak Ridge, Tennessee (DOE/OR/01-3016&D1)

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 November 25, 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:

General Comments

1. Data provided in East Tennessee Technology Park (ETTP) Project Team meetings have shown perfluorooctane sulfonate (PFOS) and perfluorooctanoic acid (PFOA) maximum contaminant level (MCL) exceedances in surface water samples collected from Mitchell Branch including the K-1700 area. PFOS and PFOA were detected in groundwater wells in the K-1085 area and exceeded MCLs in the K-1064 area. Recent advances in per- and polyfluoroalkyl substances (PFAS) toxicity and bioaccumulation research have resulted in promulgated regulatory limits available to support multi-media risk characterization. PFAS analyses in surface water and sediment should be included in the Phase 2 sampling effort. PFAS analysis for biological tissue should also be considered, where possible, as the U.S. Environmental Protection Agency has recommended ambient water quality criteria for PFOS and PFOA for fish tissue and invertebrates.

2. The United States Geological Survey recently conducted a review of available mercury toxicity data and developed new toxicity reference values (TRVs) for avian receptors

(reference upon request). Methylmercury analysis from the study resulted in lower TRVs for some species of birds. Do the wildlife ecological screening values (ESVs) used in this Supplemental Sampling and Analysis Plan (SAP) include birds? Should the ESVs be revised and the ecological risk assessment in Appendix C refined further based on the new TRVs established in the study?

Specific Comments

1. **Page 3-5, Figure 3.4**
   Surface water sample location RM-BPN-SW1 appears out of place. Please correct the location placement as necessary.

2. **Page 3-11, Section 3.1.2, first paragraph**
   Please add text explaining how the Phase 1 wet season samples were deemed usable in the Supplemental SAP after they were rejected in the data quality assessments (DQAs). Also, please discuss any difference in the interpreted conditions between the DQAs and the Supplemental SAP resulting from the inclusion of the data.

3. **Page 3-13, Section 3.1.7**
   Polychlorinated biphenyls (PCBs) are associated with storm drains and outfalls throughout ETTP. Does existing surface water data suggest storm drains and outfalls are sources of PCBs along Mitchell Branch? If yes, then PCB sampling should support the storm drain closure project.

4. **Page 3-30, Figure 3.10**
   The sediment biological assessment locations shown in the figure appear to be spatially biased to the northern ends of both beaver ponds. Without referring to Appendix E, the distribution is presumed to be due to refinement screening values (RSV) exceedances in Phase 1 data. Please include text in Section 3.4.1 discussing the spatial distribution of the proposed sampling locations.

5. **Page 3-32, Section 3.4.1, second paragraph**
   It is unclear why the RSV hazard quotients were evaluated in aggregate for all five water bodies. Please clarify and include text that evaluates drivers unique to a specific water body. Are there any contaminants of potential concern lost in the evaluation processes by aggregating the analysis?

6. **Page C-3, Table C.1**
   The third decision point in the table is contingent on a significant reduction of growth, reproduction, or survivorship of *Ceriodaphnia*. What value is considered significant? Is this decision point based on LC50 or IC25 with a solution concentration trigger level?

7. **Page C-4, Table C.1, last measurement endpoint**
   It is unclear why adult dragonflies are used as a measurement endpoint for benthic invertebrate community assessment. Adult dragonfly data is a proper benchmark for

risk assessments of aerial insectivores, but the appropriateness of using them to answer risk questions in aquatic benthic communities is less known. What is the likelihood that contaminants could be lost during the molting process and not captured in the adult phase? Please address this concern.

8. **Pages C-5 and C-6, Table C.1**
   Please discuss the process by which species were chosen to represent assessment endpoints. The river otter for threatened and endangered species receptors and the meadow vole for terrestrial wildlife receptors is of particular interest.

9. **Page C-6, Table C.1, last measurement endpoint**
   Why are radionuclide activities only considered as a measurement endpoint for soils and wildlife and not for sediments and aquatic wildlife?

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

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FFA Project Manager
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