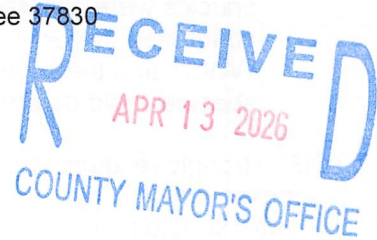




STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Land Protection – Remediation Section
Oak Ridge Environmental Field Office
761 Emory Valley Road, Oak Ridge, Tennessee 37830

April 8, 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: Transmittal of the Time-Critical Action Memorandum for the Phase 1 Removal Action at the White Wing Scrap Yard, Oak Ridge National Priorities List Site, Oak Ridge, Tennessee (DOE/OR/01-3015&D1)

The Tennessee Department of Environment and Conservation (TDEC) supports the potential future property transfer and beneficial reuse of White Wing Scrap Yard (WWSY). Given that the U.S. Department of Energy (DOE) has elected to proceed under time-critical removal action authority, TDEC would like to highlight outstanding concerns regarding the responses to comments on the Time-Critical Action Memorandum (TcAM) for the Phase I Removal Action at the White Wing Scrap Yard.

- Regarding response to specific comment #1: TDEC disagrees with the language in the response implying that the evaluation of impacts to groundwater is complete. The response suggests that a comparison of soil samples results to maximum contaminant level (MCL) based soil screening levels was conducted although it appears this comparison was not included in the TcAM. In order to contribute to the performance of a long-term remedial action, the action memorandum should include an evaluation of groundwater contamination and/or threats to groundwater from contaminated soil. Additionally, without monitoring wells downgradient of the removal action area, the potential impacts to groundwater cannot be fully understood.
- Regarding response to specific comment #8: Table A.1 of the signed action memorandum still includes multiple regional screening levels (RSLs) that are not correct including PCB-1016, 1,1-dichloroethene, and all per- and polyfluoroalkyl substances. The accuracy of the values in this table is vital to ensure characterization data is properly evaluated and removal actions are done to completion under CERCLA. TDEC recommends all preliminary remediation goals and RSLs in the table be checked and corrected where necessary.
- Regarding response to specific comment #13: TDEC disagrees with the last sentence of the response stating "federal requirements for threatened and endangered species were not included since only state-listed species have been identified at White Wing Scrap Yard." TDEC appreciates that steps were taken to mitigate impacts to federally-listed bats by scheduling tree cutting during the appropriate window, but DOE should not assume that there are no federally-listed species present due to the lack of existing data. TDEC annual

Environmental Monitoring Reports (EMRs) from 2014-2017 include reports of such species in Bear Creek Valley, including locations in the vicinity of WWSY. These monitoring efforts were often conducted in conjunction with the Oak Ridge National Laboratory (ORNL) Natural Resources staff, and similar data are represented in ORNL records, as well. Federally-listed species were also recorded in Bear Creek Valley during the EMDF Natural Resources Survey conducted by ORNL. Given the proximity of the TDEC and ORNL monitoring sites to the WWSY and the contiguous forest in this area, there is no reason not to expect that these species could be present at the WWSY.

TDEC strongly recommends that DOE consider collaborating with EPA and TDEC on comment responses during future removal action efforts. Questions or comments concerning the contents of this letter should be directed to Eileen Marcillo at eileen.marcillo@tn.gov or by phone at (865) 985-2397.

Sincerely

Eileen Marcillo

Digitally signed by Eileen
Marcillo
Date: 2026.04.07 10:39:37 -04'00'

Eileen T. Marcillo
FFA Project Manager
Division of Land Protection – Remediation Section
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