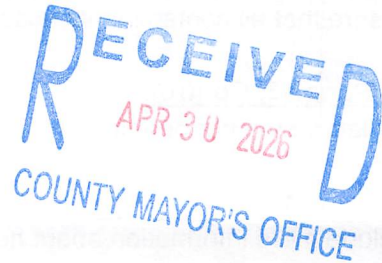




STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Land Protection – Remediation Branch
Oak Ridge Environmental Field Office
761 Emory Valley Road, Oak Ridge, Tennessee 37830

April 28, 2026

Mr. Roger Petrie
Oak Ridge Office of Environmental Management
U.S. Department of Energy
Post Office Box 4067
Oak Ridge, Tennessee 37831



Dear Mr. Petrie

Re: Transmittal of the Addendum to the Removal Action Work Plan for the Y-12 Facilities Deactivation/Demolition Project, Oak Ridge, Tennessee A19 – Demolition of Facility 9720-17, Warehouse/Industrial (DOE/OR/01-2479&D1/A19)

The Tennessee Department of Environment and Conservation, Division of Land Protection-Remediation Branch, Oak Ridge Office, received the above referenced submittal on January 28, 2026. The document has been reviewed pursuant to the Federal Facility Agreement for the Oak Ridge Reservation. The following comments are relevant to that review:

1. Page 9, Section 4.1, second bullet

This bullet should discuss preparation of a site-specific Contamination Migration Control Plan (CMCP). The document should also commit to providing the site-specific CMCP to the regulators for information.

2. Page 10, second primary bullet, first sub-bullet

The Waste Handling Plan for Building 9720-17 (DOE/OR/01-2961&D1) excludes "9744 exterior mechanical system with hoppers, fans, and ductwork" from the work scope. The language in the Waste Handling Plan regarding the 9744 exterior mechanical equipment is inconsistent with the language in this document. Please provide further clarification of which portions of the 9744 exterior mechanical system are now included in the scope of demolition and which portions are excluded from the work scope.

3. Page 12, Section 4.3

Please include another bullet that discusses evaluation of the slab to identify any necessary provisional management of the slab following demolition.

4. Page 12, Section 4.4, first paragraph

Include a statement that site-specific Best Management Practices will be identified in the CMCP which will be provided to the regulators for information.

5. Page 12, Section 4.4, Contaminants

Ensure that all contaminants associated with the 9744 dust collection system are included here.

6. Page 13, Controls

Explain why a permeable berm is being utilized versus a lined berm for stormwater control.

7. Page 15, Accumulated Water

Include more information about how accumulated water will be managed. Will secondary containment for containers of petroleum products or other liquid hazardous materials be used? If so, how will this accumulated water be managed? The document should commit to not discharging accumulated water directly to stormwater conveyances or to the storm drain network.

8. Page 17, first paragraph

Include the referenced Waste Handling Plan in Section 8 of the document.

9. Page 19, Section 6.1

- a. Mercury should be included as an analyte for stormwater monitoring.
- b. At least three baseline samples should be collected over six months prior to demolition start following sufficiently large rain events to support the stormwater sampling.
- c. At a minimum two post-demolition samples should be collected after waste loading is complete. The results of the post-demolition samples should be evaluated to determine if continued monitoring is necessary.
- d. Action levels and expected responses to exceedances should be described in Section 6.1.

10. Page 19, Section 6

Include a sub-section that discusses any air monitoring that will be conducted to ensure that there is no contaminant migration from the work site.

Review of this document meets the review cycle protocol of 90 days. Questions or comments concerning the contents of this letter should be directed to Angel Perkey at the above address or by phone at (865) 985-6851.

Sincerely

Eileen Marcillo Digitally signed by Eileen Marcillo
Date: 2026.04.27 10:24:53 -04'00'

Eileen Marcillo
FFA Project Manager
Division of Land Protection – Remediation Branch
Oak Ridge Environmental Field Office

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