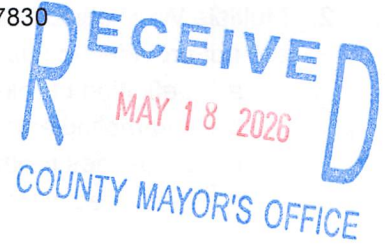




STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Land Protection – Remediation Branch
Oak Ridge Environmental Field Office
761 Emory Valley Road, Oak Ridge, Tennessee 37830

May 13, 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

TDEC Comment Letter for the Waste Handling Plan for White Wing Scrap Yard, Oak Ridge National Priorities List Site, Oak Ridge, Tennessee (DOE/OR/01-3023&D1)

The Tennessee Department of Environment and Conservation (TDEC), Division of Land Protection – Remediation Branch (DLP-RB), Oak Ridge Environmental Field Office, received the above referenced submittal on April 15, 2026, along with a request from the U.S. Department of Energy (DOE) to meet an expedited review cycle of 30 days. Per the Federal Facility Agreement (FFA), Waste Handling Plans (WHP) are primary documents and therefore allotted 90-day review cycles. The expedited review cycle was not communicated to the project team prior to the submittal of the WHP and as of the date of this letter, DOE has not provided FFA milestones for either this WHP or the associated White Wing Scrap Yard (WWSY) Phase 2 Time-Critical Action Memorandum (TCAM). For future phases of work, TDEC requests that DOE communicate scopes and document review expectations as information becomes available. The document has been reviewed pursuant to the FFA for the Oak Ridge Reservation (ORR) and meets the requested expedited 30-day review cycle. TDEC provides the following comments:

General Comments

1. As discussed during the WWSY TCAM WHP-Scoping Meeting held on January 26, 2026, and represented in the associated meeting materials, the WHP for WWSY would define the process for waste characterization and the following data quality assessment (DQA) would require regulatory approval after waste is characterized. Section 4.2 of the draft WWSY WHP only mentions that the DQA will be “presented to the FFA parties” and doesn’t specify any expectation of regulatory approval. The DQA approval approach is also consistent with discussions and agreement in a December 3, 2025, tri-party partnering meeting on WHPs. Considering that DOE is expecting to have the WWSY WHP approved prior to collecting the necessary characterization data, tri-party approval on the project-specific DQAs will be

necessary. Please revise the language in Section 4.2 to outline the need for tri-party approval on DQAs.

2. Multiple WHP objectives previously agreed upon during the January 26, 2026, scoping meeting are not provided in this draft WHP including:
 - a. Definition of roles and responsibilities for regulatory oversight.
 - b. A sampling and analysis plan (SAP) for waste characterization.
 - c. Guidelines for the content of the data quality objectives (DQOs) and DQAs.
 - d. Estimated waste volumes (onsite and off-site).

Please revise the document to align with the goals that were agreed on during the scoping meeting.

3. As per Appendix I-14 of the DOE Oak Ridge FFA, WHPs are prepared for “sampling efforts taken to support the development of a waste profile for remediation efforts milestone within this Agreement.” Please add milestones covering the phases of work intended to be completed using this WHP.
4. As of May 7, 2026, TDEC has not received the WWSY Phase 2 TCAM and therefore was unable to confirm statements regarding which contaminants contribute unacceptable human health risk. As stated in comments on the Phase 1 TCAM, TDEC encourages DOE to evaluate the threat to groundwater when implementing the Phase 2 scope of work.

Specific Comments

5. Section 1, Page 1, first paragraph – This paragraph states that the WHP defines the manner in which remediation wastes from the Phase 2 WWSY action will be disposed of in accordance with the *Time-Critical Action Memorandum for the Phase 2 Removal Action at the White Wing Scrap Yard, Oak Ridge National Priorities List Site, Oak Ridge, Tennessee* (DOE 2026a). The referenced DOE 2026a document was not submitted to TDEC in time to meet the expedited document review cycle requested by DOE. Please revise the text to clarify that DOE expects regulatory concurrence on the WHP prior to the submittal of the associated action memorandum and remove the DOE 2026a document from the list of references.
6. Section 1, Page 1, last paragraph – It is stated here that “future actions in the Y-12 and ORNL areas will be covered under future documents.” Will those future documents include future WHPs?
7. Section 2, Page 5, first bullet – Considering TDEC has not received the WWSY Phase 2 Time-Critical Removal Action Memorandum, please clarify if this action will also conduct excavation of soil/debris for protection of the environment or is the action being conducted solely for threat to human health via direct exposure. Please also clarify what exposure route(s) were evaluated for direct exposure (e.g., ingestion, dermal absorption).

8. Section 2, Page 5, last paragraph – Given that mercury impacted soil is expected and elemental mercury has been observed, will mercury impacted soil from WWSY be included in the quarterly updates to the Site Treatment Plan (STP)? Does DOE plan on recovering or treating all visible elemental mercury from WWSY?
9. Section 2, Page 5, last paragraph - Will efforts be made to segregate vegetative material (wood chips, root balls, etc.) from waste where possible to limit use of landfill space? Please include language in the WHP that outlines how incidental vegetative material will be characterized or screened before disposal.
10. Section 2, Page 6, first paragraph – The text in this paragraph describes the management of water that may accumulate in excavations and treated at Liquid and Gaseous Waste Operations (LGWO). Please revise the document to include additional details of the management of wastewater including potential sediment disposal, filtration, estimated volumes, etc.
11. Section 4.1, Page 9, first paragraph – The text here states that contamination may be deeper than 10 feet (ft) below ground surface (bgs). Considering the persistent exceedance of the trichloroethene groundwater maximum contaminant level in WWSY monitoring wells, and the lack of defined groundwater plume boundaries, will the scope of work defined in the associated action memorandum (DOE 2026a) include potential removal of material below 10 ft bgs that could pose a threat to groundwater contamination?
12. Section 4.1, Page 9, second paragraph – The text states that “no listed waste is expected to be generated by activities in this WHP” please include additional information about how the WWSY listed waste determination was conducted to reach this conclusion.
13. Section 4.2, Page 9, second paragraph – The DQA should also include details of how characterization and the resulting data confirms appropriate waste lot population(s) and discuss how waste populations were segregated. Please revise the document to include these details.
14. Section 4.2, Page 9, second paragraph – The last sentence in this paragraph states that the DQAs will be attached to the completion report. Considering that the DQAs will contain details of waste handling and require regulatory approval, revise the document to specify that the DQAs will be added to this WHP following tri-party approval.
15. Section 4.2, Page 10, first paragraph – The text here states “sampling of metal coupons from metallic debris is not anticipated at this time.” How does DOE plan to determine if metallic debris is volumetrically contaminated in lieu of analyzing coupons?
16. Section 5.1, Page 11, first paragraph – The text here states that characterization will be completed in accordance with “a SAP” and presented in the DQA. During the WWSY TCAM WHP-Scoping Meeting held on January 26, 2026, a SAP was to be included as part of the Waste Characterization Protocol section of the WHP. Please revise the document to include a

SAP that defines the process for how waste is expected to be characterized and segregated, including anomalous and uncontaminated debris, soils/sediment, and accumulated rainwater.

17. Section 5.4, Page 13 – Does DOE anticipate the need to use public access roads to transport waste to EMWMF? Please revise the language here to include a discussion of survey requirements for transportation routes of waste to EMWMF.

TDEC's effort in meeting the expedited review cycle requested by DOE reflects our commitment to collaborating with DOE to ensure efficient and complete clean up. Questions or comments concerning the contents of this letter should be directed to David Carlone at the above address or by phone at (865) 839-3362.

Sincerely

Eileen Marcillo

Digitally signed by Eileen
Marcillo
Date: 2026.05.11 20:29:57 -04'00'

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

ec: Cathy Amoroso – EPA
Jason Poe – EPA
Jana Dawson – EPA
Alex Schenck – DOE
Joanna Hardin – DOE
Tanya Salamacha – UCOR
Sid Garland – UCOR
ORSSAB
OREM Mailroom

xc: Wade Creswell – ORRCA
Amy Fitzgerald – ORRCA
Terry Frank – ORRCA
Warren Gooch – ORRCA

COPY