



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 15, 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

RECEIVED
MAY 18 2026
COUNTY MAYOR'S OFFICE

Dear Mr. Petrie

RE: Comments on the Remedial Design Report/Remedial Action Work Plan for the Environmental Management Disposal Facility, Oak Ridge, Tennessee: Support Facilities and Infrastructure (DOE/OR/01-3030&D1)

The Tennessee Department of Environment and Conservation (TDEC) Division of Land Protection – Remediation Branch, Oak Ridge Environmental Field Office received the subject document on May 6, 2026. As requested by the U.S. Department of Energy in the transmittal letter, TDEC expedited review of the document, providing the following comments within 30 calendar days.

Questions or comments concerning the contents of this letter should be directed to Brad Stephenson at the above address or by phone at (865) 352-1235.

Sincerely

Eileen
Marcillo

Digitally signed by Eileen
Marcillo
Date: 2026.05.13 11:52:34
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Eileen Marcillo
FFA Project Manager
Division of Land Protection – Remediation Branch
Oak Ridge Environmental Field Office

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Specific Comments

- 1) Page 4, Section 2.1.2: Add a sentence stating that the Tennessee Department of Environment & Conservation (TDEC) and the U.S. Environmental Protection Agency (EPA) have oversight authority under the Federal Facility Agreement for the Oak Ridge Reservation (FFA) to ensure that environmental impacts associated with the planned activities protect the public health and welfare and the environment in compliance with Applicable or Relevant and Appropriate Requirements (ARARs).
- 2) Pages 5-7, Section 2.3: For consistency with other subsections in Section 2, TDEC recommends deleting all text and figures following the first paragraph. While it will be appropriate to provide details regarding the groundwater field demonstration (GWFD) in the forthcoming RDR/RAWP for the balance of landfill construction, these details are not relevant to the scope of work addressed in this document. If DOE elects to retain such details in this document:
 - a) Correct the text in the first sentence of the second paragraph to state that the three new piezometers and two replacement piezometers were installed in 2024.
 - b) For consistency with the GWFD Remedial Design Work Plan/Remedial Action Work Plan (DOE/OR/01-2948&D2), replace the first two sentences of the third paragraph with the following text: "The objective of the GWFD was to determine the seasonal high post-construction groundwater table that will control the final design elevation of the geologic buffer in the knoll area, where the seasonal high groundwater elevations have exceeded the preliminary design base."
 - c) Revise Figure 3 to show the high-frequency data collected during the GWFD. The graph presents water levels measured manually over longer intervals (approximately weekly) which obscures short-term responses that are evident in the hourly monitoring data. Hourly data reveal some seasonal water table fluctuations, albeit damped, and some influence from infiltration. Water levels at some locations within the planned landfill berm (e.g., GW-984 and GW-985) increased in the last few months of the GWFD.
 - d) Revise the text of the last paragraph (top of p. 7) to better reflect the GWFD results and acknowledge their impact on the forthcoming landfill design.
- 3) Page 7, Section 3.3, 1st paragraph, 1st and 2nd sentences: Revise the text to clarify that D-11 East is a tributary of NT-11 that does not flow from Pine Ridge to Bear Creek, as implied by the current wording.
- 4) Pages 13-14, Section 6:
 - a) Describe spill prevention plans and response measures. Section 7 and Appendix A (Section 33 71 00B) indicate that potential/ expected waste streams include hydraulic line spill cleanup material.
 - b) Clarify that roadway gravel is included as an erosion control measure, if applicable.
 - c) Specifying BMP inspection frequency and personnel qualifications.

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- d) Describe containment and other erosion and runoff protection measures planned for soil, debris, or waste stockpile areas.