



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Remediation, Oak Ridge Office
761 Emory Valley Road
Oak Ridge, Tennessee 37830

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Roger Petrie
Federal Facility Agreement Manager
Oak Ridge Office of Environmental Management
U.S. Department of Energy
Post Office Box 2001
Oak Ridge, Tennessee 37831

Dear Mr. Petrie

Department of Energy Oak Ridge Environmental Management Fiscal Year 2025 Budget Request

To date, circumstances have prevented Oak Ridge Office of Environmental Management (OREM) from sharing information with the Federal Facility Agreement (FFA) parties regarding the Fiscal Year (FY) 2025 budget request. The Tennessee Department of Environment and Conservation (TDEC), Division of Remediation Oak Ridge Office (DoR-ORO) has identified the following needs for OREM's FY2025 budget request. This information is being shared in accordance with the Oak Ridge Reservation (ORR) FFA Section XXXVIII (Funding):

1. Adequate financial resources for the Investigation and remediation of groundwater impacts from a quarter century of radioactive waste burial across the ORR:
The ORR served as a regional radiological waste disposal site for decades during the last half of the twentieth century. Numerous known groundwater plumes across the ORR have yet to be delineated or remediated. Given the millions of curies of radioactive contaminants which were buried or injected into the ground on the ORR, the more than fifty inches of annual rainfall, the relatively shallow distance to groundwater across the ORR, and the known potential of contaminant migration via karstic flow in the ORR geology, the budget request must identify the need for significant, dedicated funds to implement Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) groundwater investigations and Applicable and/or Relevant and Appropriate Requirement (ARAR)-compliant corrective actions on the ORR. The cost liability of these groundwater investigations and remediation projects will continue to increase until the U.S. Department of Energy (DOE) initiates and completes protective remedial actions on the ORR.

2. Expediting remediation of contaminant sources within Bear Creek Valley (BCV) to ensure protectiveness of DOE's proposed Environmental Management Disposal Facility (EMDF):
The FFA parties are planning for additional CERCLA on-site waste disposal in BCV. As part of the CERCLA protectiveness determination and in satisfying ARARs for the discharges of wastewater which would occur as part of operation of this waste disposal facility, the FFA parties are attempting to expedite remedial action(s) within BCV to minimize potential impacts from additional waste disposal in the area. One such corrective action planned for Northwest Tributary 8 (NT-8) is intended to address significant uranium releases from the western edges of the Bear Creek Burial Grounds (BCBGs) while also reducing Polychlorinated Biphenyl (PCB) releases from the same area. Similarly, to satisfy ARAR concerns related to new mercury discharges to Bear Creek, the FFA parties have tentatively agreed to a methylmercury strategy requiring a milestone for a Remedial Site Evaluation for Bear Creek and Bear Creek Valley to investigate potential actions to reduce the level of methylmercury in fish living in the creek. Planning milestones have been established for the NT-8 project allowing field work during FY2025 if funding is available. This funding request should ensure appropriate funding is identified to implement the NT-8 action as well as both plan and execute the methylmercury strategy being adopted in the EMDF decision-making process.

3. Identification and development of potential technologies for effective characterization and remediation of mercury in various media at the Y-12 WEMA:
OREM's current plan to initiate near-term, large-scale D&D projects at the Y-12 facility is welcomed by TDEC. As a lesson learned from the D&D projects at the East Tennessee Technology Park, an integrated plan is necessary to characterize, demolish, and manage the waste(s) associated with the most contaminated, complex facilities within the Y-12 facility in a manner protective of human health and the environment. Key issues associated with safe and compliant waste management include adequate characterization, any necessary treatment, and proper waste disposal. The FFA parties must ensure budget requests include sufficient funding for characterization, remediation, and necessary waste management of mercury areas at Y-12.

4. Procurement and construction of groundwater monitoring wells at the Environmental Management Waste Management Facility (EMWMF) to ensure compliance and protectiveness
The FFA parties have discussed and agreed to the need for additional monitoring wells at the EMWMF. Based on discussions with DOE-EM, TDEC understands the subject budget request is being used to gather funds to procure and install appropriate monitoring wells at the site. Because compliant and protective monitoring at the waste disposal site is critical, TDEC specifically requests this activity be funded and implemented as soon as possible.

In accordance with Section XXXVIII, paragraph C of the ORR FFA, if the issues above cannot be resolved prior to DOE-OR's budget request to DOE-HQ, then the issues should be forwarded along with the budget request.

Questions or comments concerning the contents of this letter should be directed to Randy Young at (865) 220-6584.

Sincerely

Randy C. Young
FFA Manager
Division of Remediation – Oak Ridge Office

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