



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

July 18, 2025

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

TDEC Comments: Federal Facility Agreement Review of Field Sampling Plan for Baseline Groundwater and Surface Water Characterization at the Proposed Environmental Management Disposal Facility, Oak Ridge, Tennessee (DOE/OR/01-2812&D3)

Dear Mr. Petrie

The Tennessee Department of Environment and Conservation (TDEC) Division of Remediation has reviewed the subject Field Sampling Plan received on May 21, 2025. The plan is a secondary document under FFA Section XXI.B.2 *General Process for RI/FS and RD/RA Documents* and will be finalized in the context of the associated primary document, the Background Characterization Report for the Environmental Management Disposal Facility (EMDF).

TDEC appreciates the inclusion of a more comprehensive analyte list and recognizes the improvements in the D3 version of the plan. However, to accurately evaluate conditions, TDEC recommends the use of analytical methods with quantitation limits low enough to detect and measure constituents at or below applicable water quality criteria for establishing baseline values. In accordance with Rule 0400-40-03-.05(8), TDEC recommends basing threshold/evaluation values for non-naturally occurring constituents of concern (COCs) on "sufficiently sensitive" analytical methods. TDEC also recommends analyzing perfluoroalkyl and polyfluoroalkyl substances (PFAS) during the baseline sampling program. Finally, TDEC emphasizes that while surface water monitoring is valuable, it does not fulfill the requirements for detection monitoring.

Questions or concerns regarding this letter may be directed to Brad Stephenson at the above address, by phone at 865-352-1235, or by e-mail at brad.stephenson@tn.gov.

Sincerely

A handwritten signature in black ink, appearing to read 'Randy C. Young'.

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

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