



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 1, 2022

VIA ELECTRONIC MAIL

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

Dear Mr. Petrie:

The U.S. Environmental Protection Agency has completed review of the *Phase 3 (Borrow Areas) Characterization Report for the Environmental Management Disposal Facility, Oak Ridge, Tennessee (DOE/OR/01-2832&DI)* dated September 2019. The review of this document is now provided following the tri-party signed Environmental Management Disposal Facility (EMDF) Record of Decision (September 30, 2022).

This report provides a summary of field activities conducted during the Phase 3 Borrow Area Characterization for the proposed EMDF site. The results convey the geotechnical data collected to determine if materials in the potential borrow areas are of sufficient quality and quantity to support construction of the EMDF and the development of borrow area operation plans. Geotechnical testing and characterization focused on three borrow area sites: 1) the Uranium Processing Facility Spoils Area, 2) Site 7b Borrow Area, and 3) the Central Borrow Area.

Comments are attached and must be resolved before a revised document is submitted.

If you have any questions or concerns regarding this matter or require additional information, then please contact me at (404) 562-8550, or electronically at froede.carl@epa.gov.

Sincerely,

Carl R. Froede Jr.
Senior Remedial Project Manager
Restoration & DOE Coordination Section
Restoration & Site Evaluation Branch
Superfund & Emergency Management Division

cc: B. Henry, DOE
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ORSSAB

EPA Comments on the Phase 3 (Borrow Areas) Characterization Report for the Environmental Management Disposal Facility, Oak Ridge, Tennessee (DOE/OR/01-2832&D1)

GENERAL COMMENTS

1. The Report does not evaluate the potential for environmental contamination at the three borrow pit areas since no samples were analyzed for chemical parameters. In addition, it does not provide historical land use background information for each area, which may provide insight about potential contaminant sources. The Report should include a summary of previous environmental investigations at the three borrow areas, and if none have been conducted then explain how these areas will be evaluated for potential environmental impacts.
2. The Report provides a brief discussion of geologic background for each potential borrow pit and provides results of the geotechnical sampling results; however, the groundwater depth at each potential borrow pit, which is critical for determining the suitability for borrow pit operations, is not discussed. Please include a discussion of seasonal-related groundwater depth at each potential borrow pit.
3. The text should discuss whether any debris was found in any of the test pits. Please revise the text to include this information.

SPECIFIC COMMENTS

1. Section 2.1, Geotechnical Boreholes, Page 5: The text provides a summary of the number of borings advanced and the total depths; however, the text should also discuss how soil cuttings were managed. Please revise the text to discuss the management of soil cuttings.
2. Section 2.4, Split-Spoon Sampling, Page 5: The text summarizes the number of samples collected and which analysis were conducted; however, no details regarding the sample locations is provided. Such details are important to ensure that the appropriate number of samples were collected for the appropriate analysis. For completeness, please provide a table that includes the sample identifier (ID), sample location, and analyses that were performed at each location.
3. Appendix A: Logs and Photos for Geotechnical Boreholes and Test Pits, Page A3 to A108: The boring logs identify sample depth and sample identification; however, the analysis for each sample is not provided. Please include the analyses associated with each sample or include a summary table with this information.

(End of Comments)