



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

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

December 11, 2019

Mr. James Y. Daffron
Acting Portfolio Federal Project Director
East Tennessee Technology Park Projects
Oak Ridge Office of Environmental Management
U.S Department of Energy
P.O. Box 2001
Oak Ridge, TN 37831

Mr. Nathan Felosi
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Mr. Brian Henry
Oak Ridge National Laboratory Site Office
Y-12 National Security Complex Projects
Oak Ridge Office of Environmental Management
U.S Department of Energy
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Mr. Johnny O. Moore, Manager Director
U.S. Department of Energy
Portfolio Federal Project
BLDG. 4500N, MS-6269
P.O. Box 2008
Oak Ridge, TN 37831

Dear Mr. Daffron, Mr. McMillan, Mr. Henry and Mr. Moore:

Site Treatment Plan for Mixed Waste on The United States Department of Energy Oak Ridge Reservation- Submittal of the Annual Update (Version 24.0) and the Semiannual Progress Report

The Tennessee Department of Environment and Conservation (TDEC)'s divisions of Remediation (DoR) and Solid Waste Management (DSWM) acknowledge the receipt of the abovementioned update and the report in the following manner:

- The U.S. Department of Energy (DOE) Oak Ridge Office of Environmental Management (OREM)'s Semiannual Progress Report and Chapters 1, 2, 3, 4A, 5, Appendix A, Appendix B, Appendix C of the Annual Update (Version 24.0) were received on October 30, 2019 along with a cover letter dated October 29, 2019.
- DOE Oak Ridge National Laboratory Site Office (OSO)'s Semiannual Progress Report and Chapter 4B of the Annual Update (Version 24.0) were received electronically on October 30, 2019 with a cover letter of the same date.

These submittals fulfill the relevant requirements of Section 2.3.2 titled, "Timing of Updates" of the Site Treatment Plan (STP) for DOE's Oak Ridge Reservation (ORR).

For the purpose of review and approval process, the separately submitted sections of the Annual Update (Version 24.0) were integrated into one document titled, "Site Treatment Plan for Mixed Wastes on the U.S. Department of Energy Oak Ridge Reservation." Similarly, the Semiannual Progress Reports were also combined and accepted as a single report titled, "Semiannual Progress Report for the Site Treatment Plan."

Prior to these submittals, a meeting was held on September 30, 2019 with OREM and OSO. After thorough discussions, an understanding was gained of the proposed changes to be included in the Annual Update (Version 24.0) of the STP.

Our staff has reviewed the submittals. Regarding the mercury-contaminated mixed waste that is to be generated from future decontamination and decommissioning activities at the Y-12 National Security Complex, we had specifically requested in our letter of May 14, 2019, to provide in this Annual Update (Version 24.0) either the pertinent information as per Section 2.4.2 of the STP or appropriate justification, supporting information and proposed plans for approval as a deliverable for developing such information and schedules as per Section 2.4.3 of the STP. Although Section 3.5 of the Annual Update (Version 24.0) titled, "Mercury-Contaminated Mixed Waste," is informative it does not fully meet the requirements mentioned above. Specifically, it lacks the proposed plan and schedules associated with the waste stream. That being the case, as per Section 2.4.3 of the STP, proposed plans for approval as a deliverable for developing such information and schedules should have been included as part of Section 3.5 of the Annual Update (Version 24.0).

Exercising our authority under Section 2.8.5.1 of the STP, the Annual Update (Version 24.0) is being returned to DOE for a resubmittal within 60 days from the receipt of this letter for the insertion of the following milestone in reference to Section 3.5:

FY2020 milestone- DOE shall accomplish the following:

By September 30, 2020, submit a detailed report with justification, on:

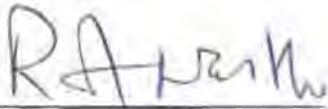
1. the specific Land Disposal Restriction (LDR) compliant treatment technology and a timeline/schedule leading to the treatment of the mixed mercury waste stream(s) to be generated prior to its eventual disposal. Include a list of potential permitted vendors who can perform the treatment utilizing this technology.
2. the characterization plan/schedule for the mixed mercury waste stream(s) to be generated. Include a list of potential licensed laboratories for this task.

With regards to OSO, we understand that there is approximately 1,017 kilograms (2.9 cubic meters) of mixed transuranic waste in the inventory. Additionally, any mixed transuranic waste to be generated will go into storage to support the first campaign for completing the final Waste Isolation Pilot Plant certification of OSO's enduring mission TRU waste that is currently targeted for September 30, 2024.

The Semiannual Progress Report was informative; it is accepted with no specific comments.

If we can be of assistance on this or a related matter, please do not hesitate to contact either Revendra Awasthi at Revendra.Awasthi@tn.gov 865-594-5468; or Ashwin Brahmbhatt at Ashwin.brahmbhatt@tn.gov 865-220-6560.

Sincerely



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