



## Department of Energy

Oak Ridge Office of Environmental Management  
 P.O. Box 2001  
 Oak Ridge, Tennessee 37831

October 31, 2019

### CERTIFIED MAIL

Mr. David W. Salyers, P.E., Commissioner  
 State of Tennessee  
 Department of Environment and Conservation  
 312 Rosa L. Parks Avenue  
 Tennessee Tower, 2<sup>nd</sup> Floor  
 Nashville, Tennessee 37243

Dear Mr. Salyers:

### RESPONSE TO YOUR LETTER REQUESTING SUBMITTAL OF PROPOSED PLANS FOR MERCURY MIXED WASTE TREATMENT, DATED SEPTEMBER 13, 2019

- References:
1. Letter from David W. Salyers to John A. Mullis, dated September 13, 2019
  2. Letter from John A. Mullis II to David W. Salyers, *Provision of Information on Potential Mixed Wastes*, dated March 28, 2019
  3. *Strategic Plan for Mercury Remediation at the Y-12 National Security Complex Oak Ridge, Tennessee* (DOE/OR/01-2605&D2/R1), dated September 2017

This letter addresses the request made in your letter, dated September 13, 2019 (Reference 1), to provide *...proposed plans for the treatment of mercury mixed waste streams bound for onsite disposal*. As indicated in our previous letter (Reference 2), available information indicates that future environmental restoration activities on the U.S. Department of Energy (DOE) Oak Ridge Reservation may generate up to 177,000 cubic yards of soil and debris containing sufficient concentrations of mercury to require treatment prior to disposal (e.g., be assigned a D009 hazardous waste code for mercury). In addition to this mixed waste volume, low-level (radiological) waste debris and soil will require disposal through cleanup of facilities and areas within the West End Mercury Area of the Y-12 National Security Complex.

DOE has identified possible treatment options for anticipated mixed waste containing mercury in the *Strategic Plan for Mercury Remediation at the Y-12 National Security Complex Oak Ridge, Tennessee* (Reference 3). Those options, as outlined in the document, are consistent with Federal and State Resource Conservation and Recovery Act requirements. At this time, however, specifics on the treatment to be carried out are still being investigated. Future Waste Handling Plans will address more detailed information on treatment, and remain the vehicles through which the tri-parties to the Federal Facility Agreement will reach agreements on the management of Comprehensive Environmental Response, Compensation, and Liability Act waste generated under the DOE environmental restoration program determined to be suitable for onsite disposal.

**CERTIFIED – RETURN RECEIPT REQUESTED**  
 (Salyers 7017 2620 0000 6500 2972)

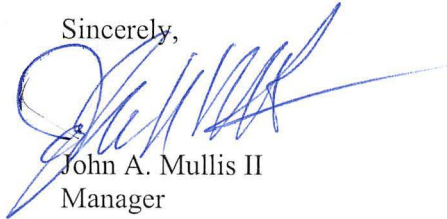
**RESPONSE TO YOUR LETTER REQUESTING SUBMITTAL OF PROPOSED PLANS FOR MERCURY MIXED WASTE TREATMENT, DATED SEPTEMBER 13, 2019**

Waste that is determined to be non-hazardous under the environmental restoration program will be managed and disposed of in full compliance with applicable laws governing Subtitle D non-hazardous waste.

As stated in our previous letter (Reference 2), all practicable measures will be taken to remove/reduce elemental mercury content in waste streams prior to disposal. Once removed, elemental mercury will be placed into secure storage, or treated and disposed of at offsite facilities consistent with Resource Conservation and Recovery Act requirements.

If you have any questions or if we can be of further assistance, please contact David Adler at (865) 576-4094 or me at (865) 576-0742.

Sincerely,



John A. Mullis II  
Manager

cc:

Franklin Hill, EPA Region 4  
Mary Walker, EPA Region 4  
Amanda Daugherty, ORRCA  
Amy Fitzgerald, ORRCA  
Ron Woody, ORRCA  
Susan DePaoli, Pro2Serve  
Shelley Kimel, SSAB  
Colby Morgan, TDEC, Oak Ridge  
Peter Murrey, TDEC, Nashville  
Steve Stout, TDEC, Nashville  
Chris Thompson, TDEC, Nashville  
Greg Young, TDEC, Nashville  
John Witzeman, UCOR  
ETTPDMC@ettp.doe.gov  
Dave Adler, EM-94  
Steve Cooke, EM-942  
Brian Henry, EM-92  
Joy Sager, EM-921

**CERTIFIED – RETURN RECEIPT REQUESTED**  
(Salyers 7017 2620 0000 6500 2972)