

**FEDERAL FACILITY AGREEMENT APPENDIX I-5
INFORMATION ASSESSMENT FOR
EAST TENNESSEE TECHNOLOGY PARK,
OAK RIDGE, TENNESSEE**

This document has been reviewed and confirmed to be
UNCLASSIFIED and contains no UCNI.

Name: Gerald Boroughs

Date: 09/01/2022

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UCOR-5588

**FEDERAL FACILITY AGREEMENT APPENDIX I-5
INFORMATION ASSESSMENT FOR
EAST TENNESSEE TECHNOLOGY PARK,
OAK RIDGE, TENNESSEE**

Date Issued—November 2022

Prepared for the
U.S. Department of Energy
Oak Ridge Office of Environmental Management

United Cleanup Oak Ridge LLC
under contract 89303322DEM000067

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APPROVALS

Federal Facility Agreement Appendix I-5 Information Assessment for East Tennessee Technology Park, Oak Ridge, Tennessee	UCOR-5588
	November 2022

USQD Review Determination	<input type="checkbox"/> USQD <input type="checkbox"/> UCD <input checked="" type="checkbox"/> CAT X <input type="checkbox"/> Exempt (select criteria 1–3 below)
Exemption Criteria	USQD/UCD/CAT X No.: _____ <input type="checkbox"/> (1) Non-intent change <input type="checkbox"/> (2) DOE-approved safety basis document <input type="checkbox"/> (3) Per criteria in PROC-NS-1001 (e.g., Chief Financial Officer, Internal Audit, Labor Relations, General Counsel, Community Outreach, or Project Integration & Business Services) OR <input checked="" type="checkbox"/> (4) Document identified in USQD-MS-CX-REPORTS-1074

USQD Preparer:	Daniel Theisen Digitally signed by Daniel Theisen Date: 2022.11.30 10:49:21 -05'00' <hr/> Daniel Theisen Date
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Exhibit L Mandatory Contractor Document	<input checked="" type="checkbox"/> No (No Proforma Change Control Board [PCCB] reviewer signature required.) <input type="checkbox"/> Yes (Requires review by the PCCB.)
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PCCB Reviewer:	_____ Name Date
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Prepared by:	SIDNEY GARLAND Digitally signed by SIDNEY GARLAND (Affiliate) Date: 2022.11.29 13:40:41 -05'00' (Affiliate) <hr/> Sid Garland, FFA Management Support UCOR/RSI EnTech, Inc. Date
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Approved by:	SAMANTHA PACK Digitally signed by SAMANTHA PACK (Affiliate) Date: 2022.11.30 09:19:07 -05'00' (Affiliate) <hr/> Samantha Pack, Environmental Services and Regulatory Manager UCOR/RSI EnTech, Inc. Date
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**FEDERAL FACILITY AGREEMENT
APPENDIX I-5 INFORMATION ASSESSMENT FOR
EAST TENNESSEE TECHNOLOGY PARK, OAK RIDGE, TENNESSEE**

Appendix I-5 to the *Federal Facility Agreement for the Oak Ridge Reservation* (DOE/OR-1014) (Attachment 1) describes how classified information is evaluated on the Oak Ridge Reservation for the purpose of environmental restoration. Operations at the East Tennessee Technology Park (ETTP) were evaluated in accordance with Appendix I-5, and the following chemicals were identified as being used in classified operations:

- acetone
- aluminum
- calcium acetate
- calcium acetate monohydrate
- calcium fluoride
- calcium formate
- calcium hydroxide
- calcium perfluorobutyrate
- cellulose acetate
- chlorine trifluoride
- copper
- demineralized water
- epoxyite resin
- fluorine
- glacial acetic acid
- hydrated lime
- hydrochloric acid
- hydrofluoric acid – anhydrous
- hydrogen perfluorobutyric acid
- ion exchange resin
- nickel
- polyphenyl ether
- sodium chloride
- sodium fluoride
- stearic acid (octadecanoic acid)
- sulfuric acid

These chemicals were identified in site-level documents and through interviews with individuals possessing knowledge of historical and present operations within the ETPP boundaries.

A summary of these chemicals, including common analysis types and comparative analytical criteria, is included in Attachment 2. Comparative criteria include regional screening levels, Safe Drinking Water Act of 1974 standards, and ambient water quality criteria. As some of these chemicals do not have comparative criteria, Table 1 summarizes those that do.

Table 1. Summary of Appendix I-5 chemicals with comparative criteria

Chemical	Regional screening level	Drinking water standard	Ambient water quality criteria
Acetone	Yes	No	No
Aluminum	Yes	No	Yes
Copper	Yes	Yes	Yes
Fluorine	Yes	Yes	Yes
Nickel	Yes	Yes	Yes
Sodium chloride	Yes	No	No
Sodium fluoride	Yes	No	Yes
Sulfuric acid	Yes	No	No

Attachment 3 summarizes characterization data (approximately last 10 years) for all chemicals with comparative criteria, showing the minimum, average, maximum, and 95% upper confidence limit (UCL95) data and indicating any exceedances. Note that only chemicals with characterization data are evaluated against the comparative criteria in Attachment 3. While some of the maximum concentrations exceed the comparative criteria, none of the UCL95 data do. All these chemicals either are being addressed in the environmental restoration effort or are not of concern. This information has been discussed with the Tennessee Department of Environment and Conservation and the U.S. Environmental Protection Agency, and completion documents will indicate the requirements of Appendix I-5 have been met.

ATTACHMENT 1
APPENDIX I-5 (OPERABLE UNIT INFORMATION ASSESSMENT
OPERATING INSTRUCTIONS) TO THE *FEDERAL FACILITY*
AGREEMENT FOR THE OAK RIDGE RESERVATION (DOE/OR-1014)

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I-5. OPERABLE UNIT INFORMATION ASSESSMENT OPERATING INSTRUCTIONS¹

In order to document the process by which all classified information is identified and handled on the Oak Ridge Reservation and to insure the Federal Facility Agreement (FFA) parties of the completeness of the information used for the development of the Record of Decision, a Operable Unit Information Assessment document will be developed as a secondary document for each operable unit (OU). This document will, in some cases, contain classified information and in all cases be developed for every OU (excluding Interim RODs for OUs completed prior to October 30, 1993).

The OU activities are as follows:

I. REQUIREMENTS

Upon approval of this operating instruction or the initiation of CERCLA activities at an OU, the OU project manager will make the project team aware of the requirement for the generation of the Operable Unit Information Assessment document that contains, as a minimum, the following information:

A. Selection Process and Criteria

1. An explanation of the process used to identify all related OU information: classified and unclassified. This includes the project team involved in the information search, how interviewees were identified, where literature searches were performed, etc.
2. An explanation of the process used by the project team to identify and select the relevant OU information to be used to support the activities leading to the Record of Decision (ROD).

B. Classified Document/Material list

1. The project team will perform interviews of any individuals with knowledge of historical and present operations within the boundaries of the OU. The person(s) and nature of all interviews will be recorded for potential use at the Remedial Investigation (RI) scoping workshop or at routine project working meetings. Any classified interviews will be included in the Operable Unit Information Assessment document list.
2. The project team will perform an exhaustive literature search for documents/materials related to the OU. All classified and unclassified documents/materials containing information related to the OU will be identified in the Operable Unit Information Assessment document list. All information determined to be pertinent is to be identified for potential use at the RI scoping workshop.

C. Relevance of the Classified Information to CERCLA

1. Provide rationale for any item in the Operable Unit Information Assessment document list (see I.B.) determined to be unnecessary or irrelevant to the performance of the OU Remedial Investigation/Feasibility Study activities. For classified compounds of concern eliminated from consideration, provide detailed information, including

¹Amended June 23, 1994, FFA-PM/94-008

analytical analysis processes and the pathway screening steps (including location(s), potential for release, quantities, material accountability procedures, and applicable references/interviewees) followed to support removal of the compound as a concern to the environment.

2. For relevant classified compounds of concern in the Operable Unit Information Assessment document, identified during the C.1 screening process, provide detailed information including analytical analysis processes and the pathway screening steps (including location(s), potential for release, quantities, material accountability procedures, and applicable references/interviewees) followed to support the CERCLA required objectives.
3. For any item in the Operable Unit Information Assessment document list determined to be necessary and relevant to the CERCLA activities performed at the OU, provide an explanation of how this classified information will be addressed in the documents generated and whether a sanitized version or an abstracted version of the primary documents will be provided for unclassified review purposes.
4. Relevant information from classified sources used in FFA primary or secondary documents will comply with the Referencing Classified Documents Operating Instructions.

II. IMPLEMENTATION

- A. For new OU activities (prior to RI scoping workshop), the unclassified documentation generated in the performance of steps I.A. and I.B. above will be provided to the FFA parties prior to the workshop along with the environmental monitoring data summary as required in step 2 of the Remedial Investigation Scoping Workshop Operating Instructions. During the RI scoping workshop, the classified information in the Operable Unit Information Assessment document will be made available, at an appropriate location, to those personnel with the proper clearance level and determined to have a 'need to know'. The Operable Unit Information Assessment document will be maintained and updated until the signing of the ROD.
- B. For OUs past the RI scoping workshop phase, the Operable Unit Information Assessment document will be developed, in accordance with the requirements in I. above pertaining to classified information, and will be maintained and updated until the signing of the ROD.

III. AVAILABILITY

- A. The maintained Operable Unit Information Assessment document for each OU will be available at the site upon request by the FFA parties' staff with appropriate level of clearance. The Operable Unit Information Assessment document will be incorporated into the OU Administrative Record file.

ATTACHMENT 2
SUMMARY OF APPENDIX I-5 CHEMICALS, ANALYSIS TYPE, AND
AVAILABLE COMPARATIVE CRITERIA

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Attachment 2. Summary of Appendix I-5 chemicals, analysis type, and available comparative criteria

Chemical	Direct analysis	Indirect analysis	Optional analysis	Comments	Comparative criteria		
					Regional Screening Level	Drinking water standard	Ambient Water Quality Criteria
Acetone	Volatiles			The current analysis was performed for volatiles by SW-846 8260.	Yes	No	No
Aluminum	Metals			The current analysis was performed for metals by SW-846 6010 or 6020.	Yes	No	Yes
Calcium acetate		Calcium	Acetate by ion chromatography	This chemical is very hygroscopic, very soluble in water (374 g/L), hydrates rapidly, becomes calcium acetate monohydrate, and then dissolves.	No	No	No
Calcium acetate monohydrate		Calcium	Acetate by ion chromatography	This solid is the most common form of calcium and is readily soluble in water. The current analysis for calcium is performed by SW-846 6010 or 6020. Acetate could be analyzed by ion chromatography (organic acids) using a common analytical method. The analysis is similar to EPA 300.0 but uses a different column and mobile phase.	No	No	No
Calcium fluoride		Calcium/fluoride		This solid is slightly soluble in water (0.015 g/L). The anion (fluoride) could be an indicator of calcium fluoride. Fluoride is typically analyzed by EPA 300 or SW-846 9056 (ion chromatography) or ion selective electrode.	No	No	No
Calcium formate		Calcium	Formate by ion chromatography	This solid is readily soluble in water (16 g/L). Formate could be analyzed by ion chromatography (organic acids) using a common analytical method. The analysis is similar to EPA 300.0 but uses a different column and mobile phase.	No	No	No
Calcium hydroxide		Calcium/pH		This is a relatively insoluble solid unless the pH is very low. It is not expected to be present in water and it may be associated with soils or clays. It can also be referred to as hydrated lime.	No	No	No

Attachment 2. Summary of Appendix I-5 chemicals, analysis type, and available comparative criteria (cont.)

Chemical	Direct analysis	Indirect analysis	Optional analysis	Comments	Comparative criteria		
					Regional Screening Level	Drinking water standard	Ambient Water Quality Criteria
Calcium perfluorobutyrate	EPA Method 537.1			The anion is a PFAS chemical—perfluorobutanoate—that can be analyzed using current EPA methodology. It is not possible to distinguish between a salt or the acid form, and it is reported as the acid form—perfluorobutanoic acid (PFBA, CAS 375-22-4).	No	No	No
Cellulose acetate				The acetate is derived from degradation, which is relatively slow. This solid is insoluble in water, but is readily biodegradable. It is not expected to be present in any measurable quantity in surface water or groundwater.	No	No	No
Chlorine trifluoride		Chloride/fluoride		This highly reactive gas is not expected to be present in groundwater, surface water, or soil. Chloride and fluoride anions would result from reactions, which can be picked up by EPA 300.0 or SW-846 9056 (ion chromatography).	No	No	No
Copper	Metals			The current analysis was performed for metals by SW-846 6010 or 6020.	Yes	Yes	Yes
Demineralized water				A non-issue because it is water.	No	No	No
Epoxylic resin				This solid is not expected to be soluble in water. It is more likely associated with soils or clays and more likely to adhere to soil or other solids. The SDSs are for concentrates.	No	No	No
Fluorine		Fluoride		This highly reactive gas is not expected to be present in groundwater, surface water, or soil. Fluoride anions and possibly elevated pH would result from reactions.	Yes	Yes	Yes
Glacial acetic acid		pH	Acetate by ion chromatography	This acid will ionize and leave acetate. Acetate could be analyzed by ion chromatography (organic acids) using a common analytical method. The analysis is similar to EPA 300.0 but uses a different column and mobile phase.	No	No	No
Hydrated lime		Calcium		This is another name for calcium hydroxide.	No	No	No

Attachment 2. Summary of Appendix I-5 chemicals, analysis type, and available comparative criteria (cont.)

Chemical	Direct analysis	Indirect analysis	Optional analysis	Comments	Comparative criteria		
					Regional Screening Level	Drinking water standard	Ambient Water Quality Criteria
Hydrochloric acid		Chloride/pH		This acid is highly reactive and is not expected to be present in groundwater, surface water, or soil. Chloride anions and possibly elevated pH, in water, would result from reactions.	No	No	No
Hydrofluoric acid – anhydrous		Fluoride/pH		This acid is highly reactive (anhydrous or otherwise) and is not expected to be present in groundwater, surface water, or soil. Fluoride anions and possibly elevated pH, in water, would result from reactions.	No	No	No
Hydrogen perfluorobutyric acid	EPA Method 537.1			This is a listed PFAS chemical—perfluorobutanoic acid (PFBA, CAS 375-22-4)—that can be analyzed using current EPA methodology. It is not possible to distinguish between a salt or the acid form.	No	No	No
Ion exchange resin				This solid is not expected to be soluble in water. It is more likely to be associated with soils or clays.	No	No	No
Nickel	Metals			The current analysis was performed for metals by SW-846 6010 or 6020.	Yes	Yes	Yes
Polyphenyl ether				This chemical is included in a class of compounds with low water solubility; some are solids. It is not particularly susceptible to degradation and has an extremely high radiation resistance. It is not likely to be in water at significant levels and is more likely to be associated with soils or solid surfaces. It has high viscosity due to high surface tension and may show up in oil and grease analysis if the concentration is high enough.	No	No	No
Sodium chloride		Sodium/chloride		This solid readily dissolves in water. The anion (chloride) could be an indicator of sodium chloride. Chloride is typically analyzed by EPA 300 or SW-846 9056 (ion chromatography).	Yes	No	No

Attachment 2. Summary of Appendix I-5 chemicals, analysis type, and available comparative criteria (cont.)

Chemical	Direct analysis	Indirect analysis	Optional analysis	Comments	Comparative criteria		
					Regional Screening Level	Drinking water standard	Ambient Water Quality Criteria
Sodium fluoride		Sodium/fluoride		This solid readily dissolves in water. The anion (fluoride) could be an indicator of sodium fluoride. Fluoride is typically analyzed by EPA 300 or SW-846 9056 (ion chromatography) or ion selective electrode.	Yes	No	Yes
Stearic acid (octadecanoic acid)			HPLC	Commonly found in fats from plants and animals, this is one of the most common long-chain fatty acids. Sodium and calcium salts are common releasing agents for plastics. It can be analyzed by HPLC and there is no standard EPA method; however, industry methods are available.	No	No	No
Sulfuric acid		Sulfate/pH		This is a reactive acid. The anion (sulfate) and pH could be indicators of this potential source. Sulfate is typically analyzed by EPA 300 or SW-846 9056 (ion chromatography).	Yes	No	No

CAS = Chemical Abstracts Service
 EPA = U.S. Environmental Protection Agency
 HPLC = high-performance liquid chromatography
 PFAS = per- and polyfluorinated alkyl substances
 PFBA = perfluorobutanoic acid
 SDS = Safety Data Sheet

ATTACHMENT 3
APPENDIX I-5 CHARACTERIZATION DATA SUMMARY

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**Attachment 3 Table 2. Default indoor worker risk-based RSLs for tap water
January 2022, https://rais.ornl.gov/cgi-bin/prg/PRG_search?select=chem**

Chemical	CAS number	Chronic RfD (mg/kg-day)	RfD reference	Noncancer-adult absorbed dose per event (µg/cm²-event)	Ingestion RSL HQ=1 (µg/L)	Dermal RSL HQ=1 (µg/L)	Noncarcinogenic RSL HI=1 (µg/L)
Acetone	67-64-1	9.00E-01	IRIS (current)	5.35E+00	8.41E+04	9.05E+06	8.33E+04
Aluminum	7429-90-5	1.00E+00	PPRTV (current)	5.94E+00	9.34E+04	8.37E+06	9.24E+04
Copper	7440-50-8	4.00E-02	HEAST (current)	2.38E-01	3.74E+03	3.35E+05	3.70E+03
Fluoride	16984-48-8	4.00E-02	Cal EPA (current)	2.38E-01	3.74E+03	3.35E+05	3.70E+03
Nickel soluble salts	7440-02-0	2.00E-02	IRIS (current)	4.75E-03	1.87E+03	3.35E+04	1.77E+03

CAS = Chemical Abstracts Service

Cal EPA = California Environmental Protection Agency

HEAST = Health Effects Assessment Summary Table

HI = hazard index

HQ = hazard quotient

IRIS = Integrated Risk Information System

PPRTV = Provisional Peer-Reviewed Toxicity Value

RfD = reference dose

RSL = Regional Screening Level

Attachment 3 Table 3. Default indoor worker tap water inputs
January 2022, https://rais.ornl.gov/cgi-bin/prg/PRG_search?select=chem

Variable	Value
ED _{iw} (exposure duration - indoor worker), year	25
THQ (target hazard quotient), unitless	1
LT (lifetime - indoor worker), year	70
EF _{iw} (exposure frequency - indoor worker), day/year	250
ET _{iw} (exposure time - indoor worker), hr/day	8
ET _{iw-event} (exposure time - indoor worker showering), hr/event	0.71
EV _{iw} (events - indoor worker), event/day	1
BW _{iw} (body weight - indoor worker), kg	80
SA _{iw} (skin surface area - indoor worker), cm ²	19652
IRW _{iw} (water intake rate - indoor worker), L/day	1.25
AT _{iw} (averaging time - indoor worker), day/year	365
TR (target cancer risk), unitless	0.00001

**Attachment 3 Table 4. Default composite worker risk-based Regional Screening Levels for soil
January 2022, https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search**

Chemical	CAS number	IUR ($\mu\text{g}/\text{m}^3$) ⁻¹	IUR reference	RfD (mg/kg-day)	RfD reference	RfC (mg/m ³)	RfC reference	Carcinogenic SL	Ingestion SL	Dermal SL	Inhalation SL	Noncarcinogenic SL	SL
								TR=1E-05 (mg/kg)	THQ=1 (mg/kg)	THQ=1 (mg/kg)	THQ=1 (mg/kg)	THI=1 (mg/kg)	(mg/kg)
Acetone	67-64-1	-		9.00E-01	I (current)	-		-	1.05E+06	-	-	1.05E+06	1.05E+06 nc sat max
Aluminum	7429-90-5	-		1.00E+00	P (current)	5.00E-03	P	-	1.17E+06	-	2.98E+07	1.12E+06	1.12E+06 nc max
Copper	7440-50-8	-		4.00E-02	H (current)	-		-	4.67E+04	-	-	4.67E+04	4.67E+04 nc
Fluoride	16984-48-8	-		4.00E-02	C (current)	1.30E-02	C	-	4.67E+04	-	7.74E+07	4.67E+04	4.67E+04 nc
Nickel soluble salts	7440-02-0	2.60E-04	C	2.00E-02	I (current)	9.00E-05	A	6.41E+05	2.34E+04	-	5.36E+05	2.24E+04	2.24E+04 nc

Note: No oral slope factors were available to calculate ingestion or dermal SLs. The total carcinogenic SL only includes inhalation.

A = Agency for Toxic Substances and Disease Registry

C = California Environmental Protection Agency

CAS = Chemical Abstracts Service

H = Health Effects Assessment Summary Table

I = Integrated Risk Information System

IUR = inhalation unit risk

max = ceiling limit exceeded

nc = noncancer

P = Provisional Peer-Reviewed Toxicity Value

RfC = reference concentration

RfD = reference dose

sat = concentration of saturation exceeded

SL = screening level

THQ = target hazard quotient

THI = target hazard index

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**Attachment 3 Table 5. Default composite worker soil inputs
January 2022, https://epa-prgs.ornl.gov/cgi-bin/chemicals/csl_search**

Variable	Value
THQ (target hazard quotient), unitless	1
TR (target risk), unitless	0.00001
AT _w (averaging time - composite worker)	365
EF _w (exposure frequency - composite worker), day/year	250
ED _w (exposure duration - composite worker), year	25
ET _w (exposure time - composite worker), hr	8
LT (lifetime), year	70
BW _w (body weight - composite worker)	80
IRS _w (soil ingestion rate - composite worker), mg/day	100
SA _w (surface area - composite worker), cm ² /day	3527
AF _w (skin adherence factor - composite worker), mg/cm ²	0.12

Notes: Default particulate emission and volatilization factor parameters were used.

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