

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

SAM NUNN ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

July 6, 2023

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 *Addendum to the Remedial Design Report for the Disposal of Oak Ridge Reservation Comprehensive Environmental Response, Compensation, and Liability Act of 1980 Waste, Oak Ridge, Tennessee -- Work Plan for Groundwater Monitoring Wells West of EMWMF* (DOE/OR/01-1873&D4/A2/R1) received on June 9, 2023.

The addendum revises the Remedial Design Report with the addition of two new groundwater monitoring wells to the southwest side of the Environmental Management Waste Management Facility (EMWMF). The wells are expected to be completed while EMWMF is still operating and will monitor shallow groundwater flow generally along strike from beneath the six disposal cells. They will be reevaluated as part of the final post-closure groundwater detection monitoring network to determine if they meet the Resource Conservation and Recovery Act [RCRA] long-term groundwater monitoring requirements or if additional monitoring wells might be necessary. This document is approved based on the installation of the two planned groundwater monitoring wells.

In text, the DOE proposes to substitute a spring for one of the monitoring wells if:

“... a spring location is identified that is appropriate for detection monitoring, then the well will be eliminated and replaced with a permanent spring (surface water) location.” (p. 9).

This agreement was reached between the Tennessee Department of Environment and Conservation and the U.S. Department of Energy Oak Ridge Reservation (DOE). The EPA has not agreed to this substitution but would be willing to consider it if an appropriate perennial spring is identified and evaluated for its ability to meet the RCRA regulations at Part 264.97(a) which state the groundwater monitoring system must:

- (2) – Represent the quality of groundwater passing the point of compliance.
- (3) - Allow for the detection of contamination when hazardous waste or hazardous constituents have migrated from the waste management area to the uppermost aquifer.

Following the DOE investigation, the EPA will review the DOE White Paper requesting the substitution of the perennial spring and render a decision before agreeing to the elimination of the approved monitoring well. The EPA encourages DOE to proceed with the installation of the access road and southern-most monitoring well while the search for a possible perennial spring is being conducted.

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
FROEDE**

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Date: 2023.07.06
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Carl R. Froede Jr.
Senior Remedial Project Manager
Restoration & DOE Coordination Section
Federal Facilities Branch
Superfund & Emergency Management Division

cc: B. Henry, DOE
D. Mayton, DOE
S. Scheffler, DOE
ettpdmc@orcc.doe.gov
ORSSAB

R. Young, TDEC
B. Stephenson, TDEC
E. Sweet, TDEC
D. Casey, TDEC