

DOE-14-0241

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## Department of Energy

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

July 22, 2014

Mr. Jeffery L. Crane  
U. S. Environmental Protection Agency  
Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

Mr. Roger Petrie  
Tennessee Department of Environment  
and Conservation  
DOE Oversight Division  
761 Emory Valley Road  
Oak Ridge, Tennessee 37830

Dear Mr. Crane and Mr. Petrie:

**RESPONSE TO COMMENTS ON THE STRATEGIC PLAN FOR MERCURY REMEDIATION AT THE Y-12 NATIONAL SECURITY COMPLEX, OAK RIDGE, TENNESSEE (DOE/OR/01-2605&D2)**

Thank you for your comments on the subject document. Our response is as follows:

- Tennessee Department of Environment and Conservation (TDEC) expressed a desire that elemental mercury be captured and containerized. Where practicable and cost effective, retrievable elemental mercury will be containerized. Availability of long term storage of containerized elemental mercury in a centralized national facility will be a necessary factor in making this decision.
- TDEC requests that Department of Energy (DOE) carefully evaluate demolition strategies for buildings to prevent releases of mercury. This is consistent with DOE's planning and demolition preparation. Information regarding specific strategies will be available in project Comprehensive Environmental Response, Compensation, and Liability Act documentation. Measures will be taken to avoid releases of mercury to the environment whenever possible.
- TDEC strongly advocates waste minimization, reuse, and recycling. DOE, wherever possible, has and will continue to evaluate and consider these measures.
- TDEC states that the Outfall 200 treatment system should include capture capacity for rainfall events. The conceptual design report evaluated various configurations of treatment capacity, storage and polishing. The selected alternative was the most cost effective in removing mercury. The system, as currently envisioned, has excess capacity for stormwater management. The selected configuration was in the Remedial Design Work Plan approved by TDEC.

Additionally, studies are underway which could potentially greatly reduce the volume of clean rainfall event runoff from entering the Y-12 storm sewer systems, as well as other non-stormwater sources.

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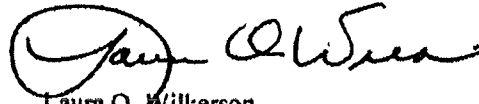
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- TDEC recommends that actions should be taken throughout the watershed including East Fork Poplar Creek, Poplar Creek and the Clinch River. DOE is conducting research evaluating the pathways and mechanisms by which fish bioaccumulate mercury. These studies will better inform the Federal Facility Agreement (FFA) parties during future decision making regarding actions available for addressing mercury concentrations in fish. This strategy will utilize an adaptive management approach to select actions to reduce mercury migration offsite and to lower concentrations of mercury in fish. The actions selected by the FFA parties will address mercury, where necessary, to achieve applicable water quality criteria and the appropriate standard for fish.
- Environmental Protection Agency (EPA) suggested various ways that this document could be incorporated into the FFA. At this time the strategy is a framework for addressing the cleanup of mercury contamination and is not envisioned to be a regulatory document.
- EPA expressed a concern that the strategy does not adequately address elemental mercury as a principal threat waste. This issue is being worked in association with the 8110 Area Remedial Design Report. A draft 8110 Area informal dispute resolution agreement has been submitted to EPA. The strategy is a high level document. Specific requirements will be identified and adhered to during implementation.
- EPA has requested to review and approve removal action work plans associated with the decontamination and decommissioning of buildings in the West End Mercury Area. This work will be accomplished under the DOE Action Memorandum DOE/OR01-2462&D2. The FFA identifies Waste Handling Plans generated for waste disposal on the reservation as the Removal Action primary document to be submitted for approval.

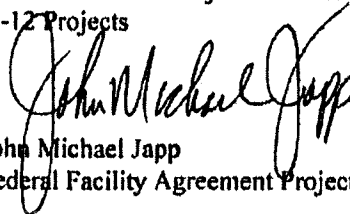
The mercury strategy is a living document and will be revisited and revised periodically as needed.

If you have questions or if we can be of any further assistance, please contact Jason Darby at (865) 241-6343.

Sincerely,



Laura O. Wilkerson  
Portfolio Federal Project Director  
Y-12 Projects



John Michael Japp  
Federal Facility Agreement Project Manager

J. Crane/R. Petrie

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cc:

Curt Myers, TDEC, Oak Ridge

John Richard, EPA Region 4

Rhonda Butler UCOR, K-1007, MS-7243

John Kubarewicz, UCOR, K-1580, MS-7119

Tanya Salamacha, UCOR, K-1580, MS-7119

Dave Adler, EM-90

Jason Darby, EM-91

Pat Halsey EM-92