



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF REMEDIATION - DOE OVERSIGHT OFFICE
761 EMORY VALLEY ROAD
OAK RIDGE, TN 37830

March 10, 2016

John Michael Japp
DOE FFA Project Manager
PO Box 2001
Oak Ridge, TN 37831

Dear Mr. Japp

Department of Energy's proposed evaluation of In-Cell Macroencapsulation of Mercury in the D4 Remedial Investigation / Feasibility Study (RI/FS) for Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Oak Ridge Reservation Waste Disposal Oak Ridge, Tennessee (DOE/OR/01-2535&D4).

This correspondence is intended to document the Tennessee Department of Environment and Conservation's position that a discussion of in-cell macroencapsulation (ICM) of mercury contaminated debris should not be included in the D4 RI/FS for the proposed Environmental Management Disposal Facility (EMDF), as has been discussed in project team meetings. At this juncture, a discussion of ICM alone among mercury treatment methodologies appears to be unnecessary, premature, and presumptive, given the uncertainties associated with the waste streams to be generated and the long-term protectiveness of ICM as currently proposed. While ICM may prove to be an option, it is not the only alternative and is very unlikely to be suitable for treatment of all the mercury contaminated debris generated by remediation on the reservation.

In this context, the demolition of buildings contaminated with mercury and the treatment of the associated waste needs to give full consideration to all treatment options in order to ensure compliance with applicable or relevant and appropriate requirements (ARAR's) and the protection of the public health and environment. It is the state's position that ICM as proposed and alternative treatment technologies for mercury contaminated wastes warrant further investigation/study and should be fully evaluated in the context of CERCLA documentation of the projects generating the waste (e.g., the WEMA facilities at Y-12). If the EMDF is approved and the method proposed for ICM is demonstrated to be a reasonable and protective alternative, the FFA parties could then consider its incorporation into the EMDF Record of Decision by amendment or explanation of significant differences, as appropriate.

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Mr. John Michael Japp
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Questions or comments concerning the contents of this letter should be directed to me at the above address or by phone at (865) 220-6584.

Sincerely

A handwritten signature in black ink, appearing to read "Randy C. Young". The signature is stylized and somewhat cursive.

Randy C. Young
Acting FFA Project Manager

xc Jeff Crane - EPA
 Pat Halsey - DOE
 Wendy Cain - DOE
 David Adler - DOE