

## **Department of Energy**

Oak Ridge Office P.O. Box 2001 Oak Ridge, Tennessee 37831—

August 15, 2008

Mr. Lance Mezga, Chairman Oak Ridge Site Specific Advisory Board Post Office Box 2001 Oak Ridge, Tennessee 37831

Dear Mr. Mezga:

## RESPONSE TO RECOMMENDATION 170: RECOMMENDATION ON REMEDIAL INVESTIGATION/FEASIBILITY STUDY FOR EAST TENNESSEE TECHNOLOGY PARK

Thank you for your recommendations concerning the Remedial Investigation/Feasibility Study (RI/FS) for the East Tennessee Technology Park (ETTP). The Site Specific Advisory Board (SSAB) recommendation on this matter contained three components.

The SSAB's first and third recommendations advised utilization of risk-based remedial goals for ground water, as opposed to Safe Drinking Water Act maximum contaminant levels (MCL's) goals to promote potential utilization of active restoration approaches. Earlier drafts of the RI/FS document focused, in part, on utilization of the Alternate Concentration Limit process for utilizing risk-based goals to determine restoration requirements for ETTP ground water. The Department of Energy (DOE) was subsequently informed by Environmental Protection Agency (EPA) that the latest EPA policy precludes the use of these risk-based standards under conditions present at ETTP, and that remedial actions must either meet MCL's, or it must be demonstrated that it is technically infeasible to do so. I agree that consideration of intermediate end-points is appropriate, and expect this issue will be resolved during the Proposed Plan negotiations and, subsequently, when a final Record of Decision for ETTP is signed. In the meantime, DOE has agreed to conduct groundwater treatability studies to determine if any practical benefits can be provided by engineered restoration approaches.

The Board also recommended re-evaluation of the 100 year duration for monitored natural attenuation activities. The 100 year timeframe was selected based upon collaborative discussions with EPA and the Tennessee Department of Environment and Conservation (TDEC), and will be retained.

Finally the Board recommended regulatory approval of the current RI/FS document as a baseline for the future decision documents. I agree with this recommendation and will pursue approval of the RI/FS by EPA and TDEC.

If you have any questions concerning this matter, please feel free to contact me at 576-0742, David Adler at 576-4094, or Jim Kopotic at 576-9441.

Sincerely,

Assistant Manager for

Environmental Management

cc:

Constance Jones, EPA, Region 4 John Owsley, TDEC/DOE-ORO Melissa Neilson, EM-13 Mike Farmer, Roane County Mayor James O'Connor, Oak Ridge City Manager LOC