



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DOE OVERSIGHT DIVISION  
761 EMORY VALLEY ROAD  
OAK RIDGE, TENNESSEE 37830-7072

SSAB  
C. 98. —  
REC. 3/21/98  
Distribute 4/1/98  
C. ELLING

March 18, 1998

William M. Pardue, Chair  
Oak Ridge Reservation Environmental Management  
Site Specific Advisory Board  
P O Box 2001  
Oak Ridge TN 37831

Dear Mr. Pardue

**End Use Recommendation for the Disposal Areas in Melton Valley**

The Tennessee Department of Environment and Conservation, DOE Oversight Division (TDEC/DOE-O) has received and reviewed the above referenced Oak Ridge Reservation Environmental Management Site Specific Advisory Board (SSAB) Recommendation. In an effort to provide increased dialogue with and better feedback to the SSAB, regarding the recommendation, the Division provides the following response.

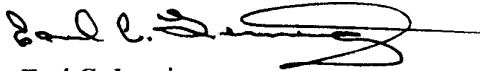
The State does recognize natural attenuation as a viable remedial action provided that acceptable clean up criteria are met within reasonable and acceptable time frames. This provision is described in *Tennessee Guidance Policy on Natural Attenuation and ARAR Waivers for Oak Ridge Reservation CERCLA Decisions*, January 21, 1998. However, it is also recognized that there are problem areas, such as the hydrofracture disposals, on the ORR that because of technical limitations extremely long term institutional controls may be necessary. In this event, arrangements for long term management and control must be made in accordance with the State's guidance policy on "perpetual institutional controls."

Standards that are protective of human health and the environment will be applied to the entire Melton Valley watershed. The State can do no less under present law. It is understood that some short lived radionuclides and organic wastes will attenuate to acceptable levels over time. The State takes the position, based on existing environmental laws, that water quality standards must be met in all "Waters of the State." Therefore, end point objectives should include all waters meeting standards, not just at White Oak Dam and the Clinch River.

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The Division appreciates the opportunity to respond to the SSAB's recommendations. If there are any questions or concerns with this response, please contact John Owsley or me at 481-0995.

Sincerely



Earl C. Leming  
Director

xc: Rod Nelson - DOE  
John Hankinson - EPA  
Susan Gawarecki - LOC

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