



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Mr. William M. Pardue  
Chair, Oak Ridge Environmental Management  
Site Specific Advisory Board  
P.O. Box 2001  
Mail Stop EW-91  
Oak Ridge, TN 37831

Dear Mr. Pardue:

The Environmental Protection Agency (EPA) has reviewed the Oak Ridge Environmental Management Site Specific Advisory Board's (Board's) *Recommendation for Sequencing of Environmental Management Activities on the Oak Ridge Reservation* (R11/5/97.2). The EPA appreciates the opportunity to review recommendations made by the Board and to provide feedback on those recommendations. Overall, EPA is in general agreement with the Board's recommendation.

The Board's recommendation highlighted eight (8) stakeholder interests regarding the sequencing of activities at the Reservation. The EPA's oversight of the Department of Energy's (DOE) cleanup program under CERCLA Section 120 is primarily focused on the remediation of actual or potential environmental releases that could present an unacceptable risk to public health or welfare and the environment. Therefore, EPA's comments will be focused on primarily four of the eight highlighted interests. While issues regarding stored legacy waste and surplus facilities are important, they are not the primary focus of EPA's oversight role under CERCLA.

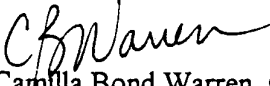
The Board recommended that DOE "initiate removal or remedial actions at sites where there are significant releases of contaminants or threats to human health and the environment." The EPA agrees with this statement. In general, EPA concurs with the "worst sites first" approach to site remediation. However, at Superfund sites that are as large and complex as the Oak Ridge Reservation, it is often necessary, useful, and more efficient to address a mix of "worst sites" and "other sites" at the same time. These "other sites" may represent isolated problems, may have to be completed prior to other projects being implemented, may facilitate further field investigations, or may help to evaluate technologies at a smaller scale. Additionally, these lower priority projects may contribute to an overall, major site problem. Therefore, in the development of enforceable milestones under the Federal Facility Agreement, the EPA desires to have a mix of high priority items and other actions that contribute to and facilitate the overall remediation of the Reservation.

The Board recommended that DOE "expedite the decision making process for an on-site waste disposal cell for newly generated CERCLA/RCRA waste which may not be disposed off site." The EPA concurs with the Board's recommendation and DOE, TDEC, and EPA have put an accelerated schedule in place to complete the decision making process for this facility. EPA recently commented on the DOE's draft feasibility study for this facility and provided those comments to the Board. This facility would be very useful to the remediation of the Reservation if it can be located and designed to be environmentally acceptable. It should be noted that this facility has been proposed by DOE to accept only CERCLA-generated wastes. In order for this facility to accept RCRA waste, legacy or newly generated, that does not directly result from a CERCLA remediation, the facility would need to be permitted by the TDEC RCRA program.

The Board recommended that DOE "expedite the watershed strategy for environmental remediation" and "coordinate similar remedial/removal activities across the ORR." EPA is actively working with the DOE to reach coordinated decisions for the watersheds identified on the Reservation. We have completed the review of the Bear Creek Valley feasibility study and are currently reviewing the Melton Valley feasibility study. EPA supports the watershed strategy for purposes of investigation and analysis of remediation alternatives. However, EPA has recommended to the DOE that watershed decisions be broken up into multiple Records of Decision (RODs) rather than one ROD for an entire watershed. EPA is working with the DOE and TDEC to reach a mutually agreeable method to ensure that selected remedies will be manageable in size, allow for effective public participation, and ensure adequate oversight and enforceability of the decisions by TDEC and EPA.

We would be happy to discuss our feedback on the Board's recommendation at your convenience. Please contact either myself at 404/562-8519, or the EPA's ex-officio representative to the Board, Edward Carreras, at 404/562-8509.

Sincerely,

  
Camilla Bond Warren, Chief  
DOE Remedial Section  
Federal Facilities Branch

cc: Earl Leming, TDEC  
Rod Nelson, DOE