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

December 11, 1997

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

Dear Mr. Pardue

**Recommendation for Sequencing of Environmental Management Activities on the Oak Ridge Reservation**

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 implementation of their recommendations, the Division provides the following responses to the individual recommendations.

Recommendation - Initiate removal or remedial actions at sites where there are significant release of contaminants or threats to human health and the environment.

Response - The State has always held this position and will continue to consider significant threats to human health and the environment as the highest priority for remediation.

Recommendation - Expedite removal/disposal of stored legacy waste to the Nevada Test Site, Envirocare in Utah; and the Waste Isolation Pilot Plant.

Response - The State has both compliance orders and a CERCLA Record of Decision that require DOE to dispose of legacy waste at the Nevada Test Site, Envirocare of Utah and the Waste Isolation Pilot Plant. The State will continue to insist that DOE make every effort to remove and properly dispose of legacy waste.

Recommendation - Expedite treatment of stored legacy waste.

Response - The State has a compliance order that addresses mixed waste treatment and will continue to insist that DOE make every effort to properly treat legacy waste for proper and final disposal.

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Recommendation - Consolidate storage of remaining legacy waste as removal/treatment proceed.  
Response - The State recognizes that consolidation of stored waste will reduce the cost of surveillance and maintenance and will continue to insist that DOE make every effort to efficiently and effectively manage its legacy waste.

Recommendation - Expedite the decision making process for an onsite waste disposal cell for newly generated CERCLA/RCRA waste which may not be disposed of off site  
Response - The State agrees that a disposal decision is needed for newly generated Waste (RCRA, Mixed, and Low Level), but is working with DOE and EPA to determine the need for and technical viability of a facility to handle only CERCLA waste through the CERCLA process. DOE is not proposing to use the on site facility to dispose of non-CERCLA generated waste at this time.


Recommendation - Expedite the watershed strategy for environmental remediation.  
Response - The State agrees with this recommendation and is working with DOE and EPA to determine if the watershed strategy will be an effective tool to remediate the NPL site.

Recommendation - Expedite the removal of surplus facilities and areas.  
Response - The State works with DOE to assure that the removal of surplus facilities is conducted in a safe and efficient manner. The State does not expect the effort to impact the State's environmental restoration efforts which are based on those facilities that pose significant threats to human health and the environment.

Recommendation - Coordinate similar remedial/removal activities across the ORR.  
Response - The State recognizes that the coordination of similar remedial/removal activities will reduce the overall cost of such activities. The State will continue to work with DOE to assure that all environmental restoration and waste management activities are conducted in an efficient and effective manner that leads to the proper treatment and final disposal of all waste.

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 (423) 481-0995.

Sincerely



Earl C. Leming  
Director

xc: Mr. John Hankinson, EPA  
Ms. Susan Gawarecki, LOC  
Mr. Rodney Nelson, DOE

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