



AK RIDGE RESERVATION

Environmental Management

July 8, 1998

Mr. Rod Nelson
Assistant Manager for Environmental Management
DOE/ORO
P.O. Box 2001, EM-90
Oak Ridge, TN 37831-2001

Dear Mr. Nelson:

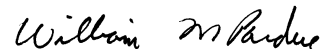
At our July 8, 1998 Board meeting, the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) reviewed and approved the enclosed two recommendations:

- (1) "End Use Recommendation for Sites not Included in the Existing Administrative Watersheds"
- (2) "End Use Recommendations for the Former K-25 Site at the East Tennessee Technology Park" along with a Minority Opinion from some of the End Use Working Group (EUWG) members

These recommendations are based upon and consistent with the conclusions reached by the EUWG, an independent group initiated by the ORREMSSAB.

We look forward to receiving your written response to our recommendations. Thank you for your continued support of the ORREMSSAB.

Sincerely,



William M. Pardue, Chair
ORREMSSAB

WMP/sb

Enclosures

cc: Margaret Wilson, DOE/ORO
Karol Hazard, DOE/HQ
Earl Leming, TDEC
Jon Johnston, EPA Region 4



End Use Recommendations for the Former K-25 Site at the East Tennessee Technology Park

This end use recommendation for the former K-25 Site at the East Tennessee Technology Park applies to the site following remediation. It does not apply to the current reindustrialization of the site or the Toxic Substances Control Act (TSCA) incinerator. This recommendation precedes the CERCLA¹ remedial investigation; thus, information regarding the scope and extent of contamination is incomplete but adequate for an end use determination. The federal government will maintain ownership of the property and is responsible for managing residual contamination and stewardship.

For purposes of end use recommendations, the former K-25 Site was divided into three zones (see map). Zone 1 along the Clinch River includes the former power plant area; this area is the least developed and least contaminated. Zone 2 consists of the former gaseous diffusion process and administration areas. Zone 3 consists of the former support area.

The following four recommendations are made (numbers do not imply priority):

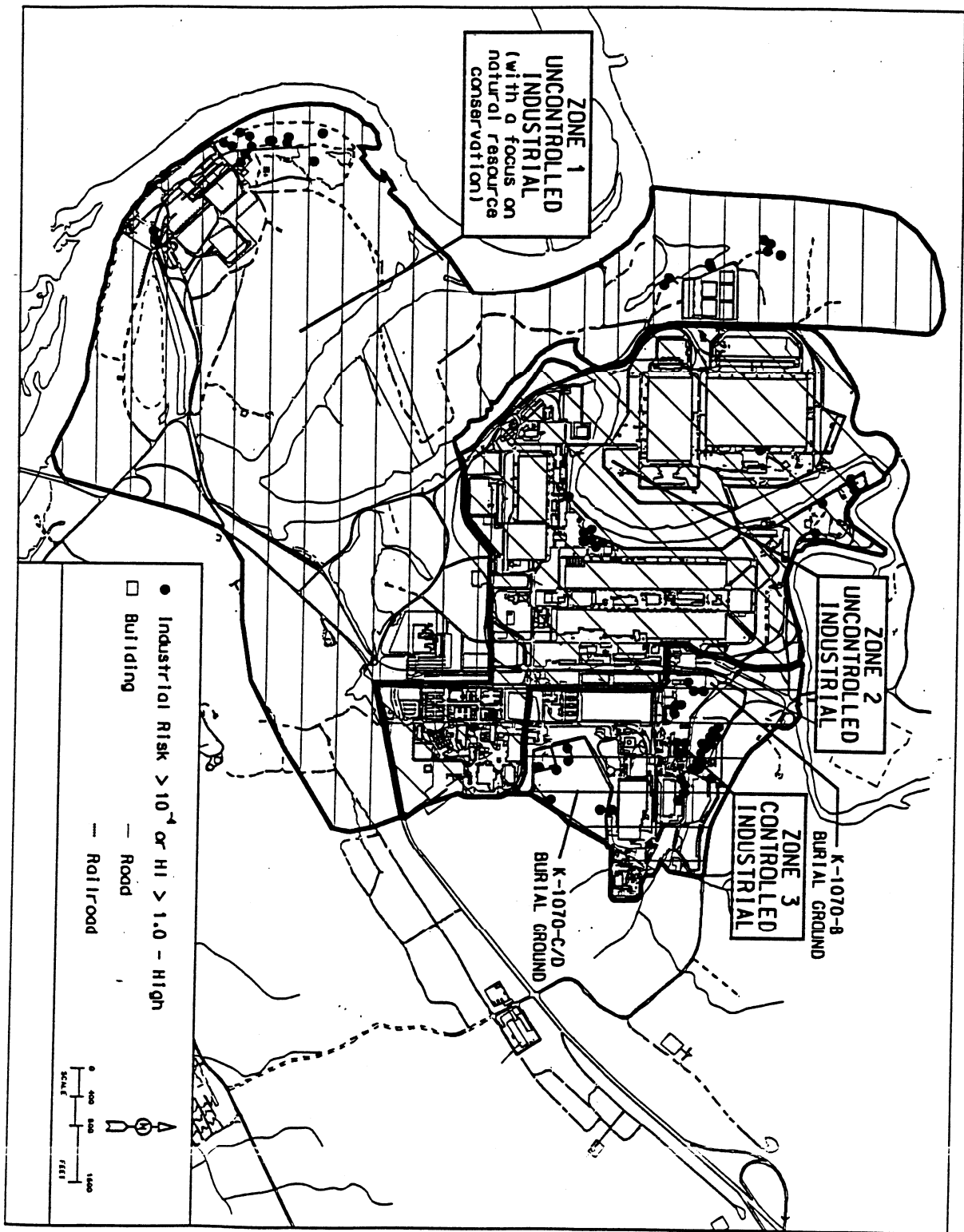
1. Zone 1 should be remediated to allow for uncontrolled industrial end use, with a focus on natural resources conservation.
2. Zone 2 should be remediated to provide for uncontrolled industrial end use.
3. Zone 3 should be remediated to provide for controlled industrial end use. If the existing K-1070 B and K-1070 C/D waste disposal areas in Zone 3 cannot be fully remediated to controlled industrial end use, then these areas should be maintained as restricted access waste disposal properties and should be managed to ensure the safety of surrounding populations and the environment.
4. The continued storage of UF₆² is not compatible with these recommended end uses. This incompatibility should be resolved on a schedule that coincides with the planned remediation of the site.

Implementation of these recommendations by DOE must be consistent with the Community Guidelines and needs for long-term stewardship. If DOE cannot meet these recommendations for the former K-25 Site, exceptions must be discussed in a public forum as part of the decision-making process.

This recommendation is based upon and consistent with the conclusions reached by the End Use Working Group (EUWG) for the former K-25 Site at East Tennessee Technology Park (EUWG recommendation dated June 11, 1998.)

¹ Comprehensive Environmental Response, Compensation, and Liability Act of 1980

² Uranium Hexafluoride





**END USE RECOMMENDATIONS FOR THE FORMER K-25 SITE
AT THE EAST TENNESSEE TECHNOLOGY PARK**

PAGE 1 OF 2

Using the former K-25 Site at the East Tennessee Technology Park (ETTP) in a manner that is safe and protective of human health and the environment is important to the long-term vitality of the Oak Ridge community. The End Use Working Group (EUWG) discussed but did not evaluate and is not commenting on the current reindustrialization process or the Toxic Substances Control Act (TSCA) Incinerator. The EUWG recommendations apply to the former K-25 Site following remediation.

The EUWG recognizes that the federal government will maintain ownership of the property and will be responsible for managing all residual contamination and other stewardship actions.

The Remedial Investigation for ETTP has not been completed, and these end use recommendations are based on preliminary information regarding the scope and extent of contamination.

For purposes of end use recommendations, the EUWG has divided the former K-25 Site into three zones (see map). Zone 1 constitutes property along the Clinch River including the former power plant area; this area is the least developed and least contaminated of the former K-25 Site considered by the EUWG. Zone 2 consists of the former gaseous diffusion process and administration areas. Zone 3 consists of the former support area.

The End Use Working Group makes the following recommendations (numbers do not imply priority):

1. Zone 1 should be remediated to allow for uncontrolled industrial end use, with a focus on natural resource conservation.
2. Zone 2 should be remediated to provide for uncontrolled industrial end use.
3. Zone 3 should be remediated to provide for controlled industrial end use. If the existing K-1070 B and K-1070 C/D waste disposal areas in Zone 3 cannot be fully remediated to controlled industrial end use, then these areas should be maintained as restricted access waste disposal properties and should be managed to ensure the safety of surrounding populations and the environment.
4. The continued storage of UF_6 is not compatible with these recommended end uses. This incompatibility should be resolved on a schedule that coincides with the planned remediation of the site.

Implementation of these recommendations by DOE must be consistent with the End Use Working Group Community Guidelines and its recommendations for stewardship. If DOE cannot meet these recommendations for the former K-25 Site, exceptions must be discussed in a public forum as part of the decision-making process.

End Use Recommendations for the Former K-25 Plant

END USE RECOMMENDATIONS FOR THE FORMER K-25 SITE
AT THE EAST TENNESSEE TECHNOLOGY PARK

*We, the undersigned members to the Oak Ridge Reservation End Use Working Group,
have participated in the development of and endorse the above recommendations.*

Dorene S. Sigal _____
Thomas A. Mulvaney _____

Roger L. Macklin _____
Raymond _____

Barbara C. Walton _____

William M. Purdue _____
Robert Peck _____

James S. Johnson _____
Andy Kelsey _____

Richard A. Mathis _____

Alfred G. Brown _____

Claudia L. Luce _____

June 11, 1998



MINORITY OPINION REGARDING THE
END USE RECOMMENDATIONS FOR THE FORMER K-25 SITE
AT THE EAST TENNESSEE TECHNOLOGY PARK

Presentations of preliminary risk assessment results conducted by DOE's contractors were made to the End Use Working Group. Of note were areas of unacceptable risk in surface soils under the industrial exposure scenario at locations where buildings are being leased or planned to be leased under current reindustrialization plans. As noted in the recommendation, the Remedial Investigation for ETTP is just beginning; it is possible that other areas of unacceptable risk will be identified over the course of the Remedial Investigation. In addition, a number of workers from the former K-25 site are sick. The cause(s) of their illnesses has not been identified, but the TSCA incinerator has the potential to be at least one source of contaminants that could be causing illness.

Under the CERCLA process, areas of unacceptable risk must be cleaned up to safe levels for current and future use exposure scenarios. The EUWG chose not to comment on the current reindustrialization plans for ETTP or the use of the TSCA incinerator. However, we must go on record as saying that it is unconscionable for the Department of Energy to lease buildings to new industries in an area when their own risk assessments indicate that risks are unacceptable under current conditions. The number of sick workers from the site corroborate their assessment. Reindustrialization of the former K-25 site should not occur until the Remedial Investigation is completed, areas of unacceptable risk are identified and controlled until they can be remediated, and the cause(s) of the illnesses are identified and corrected.

We the undersigned members to the Oak Ridge Reservation End Use Working Group, have participated in the development of and endorse the above minority opinion.

Mary Bryan _____

Jana Humphrey _____

Donna Reid _____

Jean Ramey _____

Barbara A. Walton _____

Wolf Naegel _____

June 25, 1998