



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

April 14, 2005

Mr. Steve McCracken
Assistant Manager for Environmental Management
DOE-Oak Ridge Operations
P.O. Box 2001, EM-90
Oak Ridge, TN 37831

Dear Mr. McCracken:

Comments on the Proposed Plan for Interim Actions for Contaminated Soils and Scrapyard in Upper East Fork Poplar Creek, Oak Ridge, Tennessee

At our April 13, 2005, meeting, the Oak Ridge Site Specific Advisory Board approved the enclosed comments.

We appreciate your consideration of this recommendation and look forward to receiving your written response.

Sincerely,

A handwritten signature in cursive script that reads "Kerry Trammell".

Kerry Trammell, Chair

Enclosures

cc/enc: Dave Adler, DOE-ORO
Pat Halsey, DOE-ORO
Connie Jones, EPA Region 4
John Kubarewicz, Bechtel Jacobs Company LLC
John Owsley, TDEC
Elizabeth Phillips, DOE-ORO
Sandra Waisley, DOE-HQ



**Oak Ridge Site Specific Advisory Board
Comments on the Proposed Plan for Interim Actions
for Contaminated Soils and Scrapyard in Upper East Fork
Poplar Creek, Oak Ridge, Tennessee (DOE/OR/01-2173&D2)**

BACKGROUND

The industrialized area of Y-12 National Security Complex encompasses about 600 acres near the northeast corner of the Oak Ridge Reservation (ORR) and is located within the City of Oak Ridge.

Built in 1943 as part of the Manhattan Project, Y-12 is a manufacturing and developmental engineering facility that produced components for various nuclear weapons systems. Historic manufacturing processes, programs, and waste management practices associated with Y-12's mission have contaminated soil, surface water, sediment, and groundwater of the Upper East Fork Poplar Creek (UEFPC) watershed. The processes included chemical separation techniques, weapons manufacturing, research and development, and physical plant maintenance activities.

ORR was placed on the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) National Priorities List in November 1989. The Department of Energy (DOE) and its contractors have collected considerable data concerning the UEFPC watershed. Investigations and remedial actions under the Resource Conservation and Recovery Act of 1976 (RCRA) have been ongoing since 1983. These include:

- RCRA facility investigations
- RCRA interim status assessment monitoring
- RCRA closures
- Underground storage tank removals
- CERCLA-related sample collection and analysis

Cleanup actions that addressed a number of waste sources and contaminated media in the UEFPC watershed under CERCLA and other authorities have been completed or are ongoing.

The boundaries of the UEFPC watershed, which encompass Y-12, extend along the top of Pine Ridge to the north, the top of Chestnut Ridge to the south, the eastern boundary of the Bear Creek Valley watershed to the west, and the DOE property line to the east.

DOE has issued a proposed plan, the "Proposed Plan for Interim Actions for Contaminated and Scrapyard in Upper East Fork Poplar Creek, Oak Ridge, TN, (DOE/OR/01-2173&D2)," that identifies the preferred alternative for interim remediation of the UEFPC Watershed. A preview of the proposed plan was provided to members of the Oak Ridge Site Specific Advisory Board Environmental Management Committee. This was the second presentation of the plan to the committee. These presentations form the basis of this recommendation.

DISCUSSION

The plan discusses two alternatives and presents DOE's preferred alternative. The two alternatives developed and evaluated are:

Alternative 1 – No Action. No remediation of existing contamination.

Alternative 2 – Removal of contaminated soil to a depth of 10 feet in Exposure Units 1a and 1b, and 2 feet in the balance of the plant with full removal of the Salvage Yard burial ground.

The plan approach was to subdivide the Y-12 Plant site into a number of geographical areas termed Exposure Units and evaluate cleanup based on the reasonably anticipated land use of the area. The Exposure Unit areas were then characterized and analyzed to identify primary sources of contamination. The major source of contamination at the site was determined to be an aboveground scrapyards in the west end of the plant. The plan's preferred alternative recommends that the scrapyards and other lesser contamination sources be removed in their entirety and that Exposure Units 1a and 1b on the east end of Y-12 be remediated down to 10 feet with the balance of the plant to be remediated to 2 feet.

The preferred alternative was determined to be protective of human health.

RECOMMENDATION/COMMENTS

While the Board understands that several alternatives were evaluated in arriving at the two alternatives presented in the plan, it is not clear how the decision was made that these two alternatives, alone, provide the best cleanup alternative available. It is recommended that information be included in the Record of Decision as to how this decision limiting the alternatives provided to the public for consideration was made and why these two were chosen, and that in future proposed plans more than two alternatives be included to allow a broader consideration of the viable options available. In addition, the following comments and questions were raised by Board members:

Page 5. Figure 2 has several areas in addition to the West End Mercury Area for which land use controls are designated. Provide additional discussion in the text about each area and the nature of the controls.

Page 14. Is dermal risk the only hazard associated with PCBs?

Page 15. Since the anticipated land use for the foreseeable future is controlled industrial, what else would need to be addressed in the proposed plan if that decision were final today?

Page 23. For completeness, the proposed plan should have listed the other alternatives considered but not brought forward to this stage of decision-making. This information should be added to the resulting ROD.

Page 29 or 31. Either under "Overall Protection of Human Health and the Environment" (page 29) or "Short term Effectiveness" (page 31) there needs to be more cognizance of potential exposure of site personnel not engaged in the remediation from releases of airborne contaminate particulate matter.

Page 32. Provide a summary assessment of cost estimate sensitivity to the following factors: (1) schedule uncertainty, (2) mobilization and demobilization required to coordinate with infrastructure reduction and modernization activity, (3) availability of the Environmental Management Waste Management Facility, and (4) ability to meet ORR waste acceptance criteria for all waste lots.