



Tennessee Chapter
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Advocates for the Oak Ridge Reservation
209 Whipoorwill Drive, Oak Ridge, TN 37830
www.aforr.info

April 8, 2021

Re: Proposed Environmental Management Disposal Facility (EMDF) in Oak Ridge, Tennessee
To: US Department of Energy Secretary Granholm

Dear Secretary Granholm,

Our two organizations want you to be aware of our concerns about a proposal by the Department of Energy (DOE) Oak Ridge Office of Environmental Management (OREM) to build a new landfill on the DOE Oak Ridge Reservation (ORR) for radioactive and hazardous waste from ongoing cleanup. Cleanup waste is currently going to a similar landfill that was supposed to have capacity for all planned cleanup. Even after doubling in size from the originally planned capacity, the current landfill has filled faster than expected, largely because space was taken by large volumes of clean soil backfill and by some demolition waste that may have been suitable for disposal in other onsite landfills.

The proposed new landfill site is in an area of the ORR that the OREM End Use Working Group (a federal-state-local community partnership, see <https://www.energy.gov/orem/downloads/end-use-working-group-report>) designated to be kept uncontaminated, while other areas were stipulated to be permanently sacrificed to contamination. This site has shallow and upwelling groundwater (hydrology unsuitable for waste disposal), is in a watershed that has been relatively unaffected by past federal nuclear activities, and supports mature forest and wetlands. Because the proposed landfill is classified as a remedial action under CERCLA (Superfund), it would be built and operated without the prescriptive regulatory oversight that applies to ordinary landfills. Furthermore, OREM will request waivers from some substantive environmental regulations. More information can be found at <https://aforr.info/hazardous-waste-landfill-emdf/> and specifically at <https://aforr.info/wp-content/uploads/2021/03/Radioactive-and-hazardous-waste-disposal.pdf>.

After proper characterization, some of the waste could be sent to approved facilities at dry, isolated locations in the western U.S. that have suitable conditions for effective long-term isolation, unlike wet and populous eastern Tennessee. Instead, OREM has been pursuing its landfill plan for over a decade but has not answered basic questions from environmental groups, local government, and the public. **We ask that information about the four items below be provided and that DOE engage full public participation in discussion of these issues prior to the release of the draft ROD.**

- 1) Details of waste acceptance criteria and requirements for waste. (see [letter from the Tennessee Department of Environment and Conservation dealing with these concerns](#)).
- 2) Full details of the comparative analysis of costs and local jobs for the Onsite and Offsite alternatives.

- 3) The specific waivers of regulatory requirements that would be requested for each of the onsite options and the rationale for each requested waiver.
- 4) Treatment technologies that have been evaluated or are planned to reduce waste volume in the disposal facility and immobilize any mercury waste prior to disposal.

Before an alternative is chosen for onsite disposal, the site for the landfill and the waste to be disposed should be characterized well enough to ensure it can be designed to protect human health and the environment. This characterization is essential to adequately evaluate environmental justice impacts to the nearby Scarboro neighborhood, which was designated as a segregated community during World War II. Furthermore, credible limits on the amount and concentration of hazardous chemicals and radionuclides that can be disposed in a landfill in Oak Ridge must be established and used to determine the volume of waste that should be buried onsite.

OREM told members of the Oak Ridge Site Specific Advisory Board (SSAB) that DOE will likely issue in April a draft Record of Decision (ROD) to build the landfill. We have been told that the questions above will be addressed after a decision is made to build the landfill. However, after the final decision to build the landfill is made, these questions will be answered to fit within the framework of the landfill, not in an objective manner that protects human health and the environment. Moreover, the public deserves to have detailed information about these issues before that decision is made. Wastes from the Manhattan Project and Cold War are not truly being cleaned up if they are merely moved to a previously clean site without adequate consideration for their unique properties and long-term protection of the environment. We appreciate your attention to these concerns.

Sincerely,

Virginia H Dale

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CC:

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