



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

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July 5, 2018

Via Electronic Mail to Jack.Zanger@npo.doe.gov

Mr. Jack Zanger
Attn: Y-12 SWEIS SA
P.O. Box 30030
Amarillo, TX 79120

Dear Mr. Zanger:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the U.S. Department of Energy (DOE) – National Nuclear Security Administration (NNSA) *Supplemental Analysis (Draft SA) for the Site-wide Environmental Impact State (SWEIS) for the Y-12 National Security Complex*. In the Draft SA, NNSA compares information presented in the 2011 Y-12 SWEIS with continued operations at the Y-12 National Security Complex, including any changes in programs, operations, and impacts for the 2018-2023 period and other new information that was not available when the 2011 SWEIS was prepared. The intent of the Draft SA is to determine if the existing 2011 SWEIS remains adequate, if a new SWEIS is warranted, or if the existing 2011 SWEIS should be supplemented.

Based on analysis in the Draft SA, the identified and projected environmental impacts of continued operations at Y-12 would not be significantly different from those in the 2011 SWEIS. As determined by the Draft SA the potential impacts of continued operations at Y-12 would be consistent with, and bounded by the analysis in the 2011 SWEIS. On the basis of the comparative analysis in the Draft SA in relation to the analysis in the 2011 SWEIS, and other existing NEPA documentation, NNSA has determined that there are no currently identified significant new circumstances or information relevant to environmental concerns that warrant preparation of a supplemental or new EIS. Based on the analysis in the Draft SA, no further NEPA documentation is required.

TDEC has reviewed the Draft SA and provides the following comments.

Air Resources

Section 2.2.4 “Air Quality” incorrectly identifies nonattainment and attainment status of Anderson, Knox, and Blount counties, which were reclassified as attainment areas for particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM2.5) for the 1997 annual standard on August 29, 2017 and for the 2006 24-hour standard on August 28, 2017. The Anderson, Knoxville, and Blount county area is currently classified as a maintenance area for both PM2.5 and ozone after re-designation to attainment in 2017. TDEC recommends that the Final SA reflect the current attainment and maintenance status for these counties.

Land Resources¹

DOE is considering construction of a new landfill on the Oak Ridge Reservation (ORR) for low-level hazardous and radioactive wastes under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).² Due to its coverage under CERCLA, DOE indicates that this action is not subject to additional NEPA analysis; TDEC recommends that for this proposed facility, the ORR Federal Facility Agreement documentation continue to reflect all pertinent changes in the coordination of future corrective action processes of Resource Conservation and Recovery Act (both federal and state) as required under any permits associated with CERCLA response actions.

TDEC appreciates the opportunity to comment on this Draft SA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



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¹ DOE is proposing to construct a new phase of the Industrial Landfill IV (Permit # IDL 01-000-0075) for classified, non-hazardous industrial waste, construction/demolition waste, and approved special waste. Expansion of the Industrial Landfill IV facility is subject to a major modification to the existing permit, required application materials can be found at <https://www.tn.gov/environment/permit-permits/waste-permits/1/permit-modifications.html>.

² Under CERCLA remedial actions are conducted to identify, investigate and cleanup contamination from releases or threatened releases of hazardous substances. The Remedial Action / Feasibility Study (RI/FS) process is used for this remedial action by investigating site conditions and evaluating alternatives in order to select a preferred course of remedial action.