



Department of Energy

Office of Science

ORNL Site Office
P.O. Box 2008
Oak Ridge, Tennessee 37831-6269

March 22, 2024

Mr. Vojin Janjic
Tennessee Department of Environment and Conservation
Division of Water Resources
William R. Snodgrass - Tennessee Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243-1102

Dear Mr. Janjic:

**COMMENTS ON THE DRAFT OF STATE OPERATING PERMIT NUMBER
SOP-23032 U.S. DEPARTMENT OF ENERGY (DOE), OAK RIDGE NATIONAL
LABORATORY (ORNL), OAK RIDGE, ROANE COUNTY, TENNESSEE**

The DOE ORNL Site Office's comments on the draft Standard Operating Permit provided by your office on February 21, 2024 are enclosed.

If there are any questions or additional information required, please contact Walt Doty at DotyTW@ornl.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. O. Moore".

Johnny O. Moore, Manager
ORNL Site Office

Enclosure

cc w/enclosure:

Michele G. Branton, SC-OSO
T. Walt Doty IV, SC-OSO
Chad K. Huffman, SC-OSO
Wesley D. Goddard, ORNL
Jessica B. Langstaff, ORNL
Lori A. Muhs, ORNL
Todd A. North, ORNL
David D. Skipper, ORNL
Director's Files

ENCLOSURE

**Draft State Operating Permit SOP-23032
U. S. Department of Energy Comments**

Comment Number	Page Number	Comment Topic	Comment
1	2	Item 1.1.1.4, manifest record	Oak Ridge National Laboratory (ORNL) is fully staffed around the clock with Utilities operations personnel, emergency responders, and HAZMAT/Spill response teams to promptly address any unexpected incidents. Moreover, security personnel are stationed at the portal facilities at all times. The pump & haul (P&H) vendor accesses these facilities at their convenience. Given the extensive resources available, ORNL is well-prepared to handle any spills that may occur. The P&H vendor also has a contract requirement to immediately notify ORNL in the event of a spill. Therefore, we respectfully request the elimination of the requirements for an ORNL representative to be present during transfers by the P&H vendor and recording of the names of individuals present during P&H activities in the required operating reports.
2	2	Item 1.1.4, reporting	We request that the Monthly Operation Report submittal frequency be adjusted to quarterly instead of monthly to align with reporting requirement from existing SOP-22033, where TDEC agreed to quarterly reporting.
3	10	Item 3.2, signage	DOE agrees with the need to inform the public of such facilities by placement of signage. However, these portal facilities are not readily accessible to the public, as they are located on DOE property at the security entrance portals. We request that no signage be required at these facilities.