

U.S. Department of the Interior

Atlanta, GA

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United States Department of the Interior

OFFICE OF THE SECRETARY
OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE
Richard B. Russell Federal Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

March 20, 2001

ER-01/121

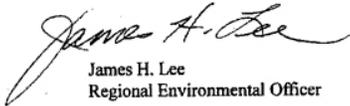
U.S. Department of Energy
Gary S. Hartman
Oak Ridge Operations, EM-912
P.O. Box 2001
Oak Ridge, TN 37831

RE: Draft Site-Wide Environmental Impact Statement for the oak Ridge Y-12 Plant

Dear Mr. Hartman:

The Department has reviewed the referenced document and has no comments to offer at this time. We provided comments previously during the scoping process.

Sincerely,


James H. Lee
Regional Environmental Officer

No comments identified.

CC: FWS-ES, RO
OEPC, WASO

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March 21, 2001

ER-01/121

Gary S. Hartman
 U.S. Department of Energy
 Oak Ridge Operations, EM-912
 P.O. Box 2001
 Oak Ridge, TN 37831

RE: Draft Site-Wide Environmental Impact Statement for the Oak Ridge Y-12 Plant

Dear Mr. Hartman:

As a followup to our comments dated March 20, 2001, we offer the following additional comments.

We reviewed the scoping document and supplemental information for the draft EIS and provided comments to the Department of Energy (DOE) in letters dated May 12, 1999, and November 24, 1999.

Volume 1 of the EIS refers to the fact that the Environmental Protection Agency (EPA) had promulgated "more restrictive ambient standards for ground-level ozone" but these standards, as of the publication of the EIS, were on appeal. The result of the discussion indicated that Atlanta, Georgia, was the nearest area that was not in attainment of the National Ambient Air Quality Standard for ozone (page 4-56). However, since the DOE knew that EPA had changed the standard, we believe this should have been considered in development of the EIS. The United States Supreme Court (subsequent to publication of the EIS) upheld EPA's authority to promulgate regulations and, as a result, many more areas much closer than Atlanta would be considered in non-attainment, including the Great Smoky Mountains National Park. As written, we are not able to draw comparisons of effects between the old standard and the new one.

We likewise recognize, however, that based upon this document (page 5-39) DOE does not expect to experience increases in emissions from its boiler plant because "additional heating requirement of the new facilities could be offset by a reduction in heating requirements for the old facilities." We also recognize that the boiler is being operated well below emissions capacity as permitted by the State of Tennessee (Table 4.7.2-5). But, again, there are no comparisons made between the existing boiler, which burns coal, and the boiler proposed for installation in 2010 (page 3-79) that would burn natural gas backed-up by heating oil. The Department would support the latter proposal since air emissions would be reduced. But this comparative information is not available in the EIS.

3/22

Comment No. 1

Issue Code: 07

As stated in Volume I, Section 4.7.2.1, the proposed, more restrictive, ambient standards for ground-level ozone and particulate matter were challenged in court. In October 1999, the U.S. Court of Appeals for the District of Columbia ruled that the ozone standard "cannot be enforced." EPA intends to have the Justice Department take the case to the U.S. Supreme Court in 2001. Therefore, due to the uncertainty of the proposed new standards and the court's legal standing, the existing enforceable ozone and particulate matter standards were used in the Y-12 SWEIS.

Comment No. 2

Issue Code: 07

A new Y-12 Steam Plant and associated gas-fired boilers described under potential future modernization projects in Section 3.3 of the Draft SWEIS are not included as a proposed project and thus are not analyzed for environmental impacts in the SWEIS. The description of a new Steam Plant was presented to inform the reader of potential future projects being considered under the long-term modernization program for Y-12. Therefore, no environmental impacts of a future Y-12 Steam Plant is included in the SWEIS. Based on internal DOE review comments and other public comments received on Section 3.3 of the Draft SWEIS, the section has been modified to reduce confusion about which projects are included in the Y-12 SWEIS for project-specific analysis. When a new Y-12 Steam Plant is proposed by DOE, the project would be evaluated under the appropriate NEPA review.

1/07

2/07

U.S. Department of the Interior

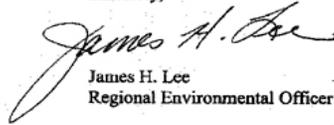
Atlanta, GA

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Finally, the above notwithstanding, we do not believe the changes proposed by the DOE in it's preferred alternative will adversely impact Great Smoky Mountains National Park.

I can be reached at 404/331-4524 if you have any questions or concerns.

Sincerely,



James H. Lee
Regional Environmental Officer

Comment No. 3
Comment noted.

Issue Code:22