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**RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY (OEPA)
COMMENTS ON THREATENED AND ENDANGERED SPECIES SURVEY
REPORTS AT THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

05/02/95

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RESPONSE



Department of Energy
Fernald Environmental Management Project
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DOE-0873-95

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Schneider:

RESPONSE TO OHIO ENVIRONMENTAL PROTECTION AGENCY (OEPA) COMMENTS ON THREATENED AND ENDANGERED SPECIES SURVEY REPORTS AT THE FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

This memo responds to comments received from Mr. Joe Bartoszek (OEPA), and establishes a path forward with regard to the threatened and endangered species survey reports. These reports were sent to your agency on February 27, 1995, for review. Faxed comments were received by Becky Bixby of the Fernald Environmental Restoration Management Corporation (FERMCO) on April 11, 1995. The comments were initially discussed during a teleconference with Ms. Bixby on April 11, 1995.

The Department of Energy, Fernald Area Office (DOE-FN) would like to thank Mr. Bartoszek, Mr. Scott Schermerhorn and Mr. Ryan Stahl for visiting the Fernald Environmental Management Project (FEMP) site on April 25, 1995. During that visit Ms. Bixby identified the areas which were investigated during the threatened and endangered species surveys and discussed Mr. Bartoszek's concerns regarding the need for additional field work. Following the site tour, Mr. Bartoszek, FERMCO and DOE-FN personnel met to discuss resolution of OEPA comments. The following is a brief synopsis of these issues and the resolution reached in that meeting.

Ms. Bixby reiterated that there were no herbarium specimens or field notes for the mountain bindweed and slender fingergrass species that were recorded during the Miami University studies in 1986-87. Mr. Bartoszek confirmed that errata sheets explaining the lack of herbarium specimens and field notes would be sufficient to resolve the issue. He concurred with the findings from the running buffalo clover survey.

Mr. Bartoszek also questioned the timing of the spring coralroot survey field work in relation to the erratic blooming period of this species. To support the conclusions of the report, Ms. Bixby agreed to resurvey the forested wetlands in April and May of this year. The surveys will be documented and copies will be forwarded to you. An initial survey occurred during Mr. Bartoszek's visit with no spring coralroot being identified.

In terms of protection for the Sloan's crayfish populations and the Indiana bat habitat, every effort will be made to protect the riparian areas and Paddys Run at the FEMP. Measures to protect natural resources have already been integrated into the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documentation for the FEMP site. Specifically, commitments to control runoff and siltation into Paddys Run and to mitigate any natural resource impacts have been made in the Proposed Plan/Feasibility Study (PP/FS) documents and subsequent Records of Decisions (RODs) for the appropriate Operable Units (OUs). Mr. Bartoszek agreed that these actions would cover his concerns raised regarding the ditch location north of the train trestle. In addition to commitments in the CERCLA documents, it was explained to Mr. Bartoszek that routine monitoring is and will continue to be performed by the Natural Resource Management Department at FERMCO to provide current status on the populations and habitat.

With regard to the cave salamander surveys and the old homeowner well (Well No. 1124) habitat, Mr. Bartoszek acknowledged that a concerted effort was made to evaluate cave salamander habitat in the on-property well with the use of groundwater monitoring equipment. He also agreed that this well is considered an artificial habitat. While no additional field work would be done in the well, it was agreed that if the well was to be abandoned at a later date, the Natural Resource Management Department at FERMCO should provide a final visual inspection for the cave salamander during the process of abandonment. Mr. Bartoszek recognized that the ravine in the northern section of the property provided minimal habitat for the cave salamander and did not feel that any additional field work needed to be done in this area.

Again, DOE-FN and FERMCO would like to thank Mr. Bartoszek for visiting the FEMP site. DOE-FN hopes that this visit was beneficial for Mr. Bartoszek and would appreciate a response from your office on the acceptance of DOE-FN's response to Mr. Bartoszek's comments.

If you have any questions, please contact Pete Yerace at (513) 648-3161.

Sincerely,



for Jack R. Craig
Fernald Remedial Action
Project Manager

FN:Yerace

CC:

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