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**FORESTED WETLANDS SURFACE WATER QUALITY STUDY -  
(COMMENTS)**

09/13/95

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6  
COMMENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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FILE: 6446.6  
REPLY TO THE ATTENTION OF:  
LIBRARIAN HRE-8J

SEP 13 1995

Mr. Jack R. Craig  
United States Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: Forested Wetlands Surface Water  
Quality Study

Dear Mr. Craig:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the Project Specific Plan (PSP) for the Forested Surface Water Quality Study. The PSP was developed to assess the general surface water quality and the hydrogeology of the northern forested wetland areas and the potential for wetland mitigation in other areas of the site.

U.S. EPA has attached several comments on the PSP. Therefore, U.S. EPA disapproves the PSP pending incorporation of responses to attached comments.

Please contact me at (312) 886-0992 or Barbara Mazur at (312) 886-1478, if you have any questions regarding this matter.

Sincerely,

James A. Saric, Remedial Project Manager  
Technical Enforcement Section #1  
RCRA Enforcement Branch

Enclosure

- cc: Tom Schneider, OEPA-SWDO
- Jack Baublitz, U.S. DOE-HDQ
- Don Ofte, FERMCO
- Charles Little, FERMCO
- Terry Hagen, FERMCO
- Michael Yates, FERMCO

(VERACE (P) partial  
ACTION RESPONSE  
TO Q-1258  
(9071)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5MEMORANDUM

**DATE:** September 5, 1995

**SUBJECT:** Review comments on Project Specific Plan for the Forested Wetland Surface Water Quality Study for Fernald

**FROM:** Barbara Mazur <sup>BAM</sup> Ecologist  
RCRA Technical Enforcement Section #1

**TO:** Jim Saric, Project Manager  
RCRA Technical Enforcement Section #1

At my request Wayne Gorski of the Watershed and Wetlands Section reviewed the Project Specific Plan for the Forested Wetland Surface Water Quality Study for the U.S. Department of Energy's (DOE) Fernald Environmental Management Project. I am attaching a copy of his review comments for your information. I recommend we provide DOE with the following comments to clarify what we expect in the way of wetland mitigation evaluation and planning at this site.

Recommendation:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the "Project Specific Plan for the On-Property Wetland Mitigation Study, Fernald Environmental Management Project", dated July 1995. We have the following comments:

1. The transmittal letter, dated July 27, 1995, identified the enclosed Project Specific Plan (PSP) as being for the "Forested Wetland Surface Water Quality Study" but the attachment is titled, "On-Property Wetland Mitigation Study". The latter title implies a broader scope and objective than the PSP delivers. It is unclear whether this PSP is a proposal to evaluate impacts to wetlands generally, or a proposal to study alternative wetland mitigation opportunities within the forested wetland north of the remediation area.

If the PSP is intended to fully address the wetland mitigation issue it is inadequate to meet this purpose. On-site mitigation decisions, should be made using the more comprehensive set of criteria described for the Northern Forested Wetlands on Page 2, Section 3.0, Paragraph 2 of the PSP.

2. The aspects of the study relating to water quality impacts appear to be well planned, however, it is difficult to see how the DOE can give adequate consideration to avoidance and minimization as wetland mitigation measures, given the limited scope of

P 7198

2

investigation planned for wetlands as presented in the PSP. A thorough functional evaluation of on-site wetlands would be necessary to accomplish this. From the information provided it appears that the DOE has already discounted the possibilities of avoidance and/or minimization and is attempting to evaluate on-site wetlands on the basis of water quality impacts alone.

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Section #: 7.0 Page #: 9 Line #: NA  
Comment: This section should clarify whether sampling will be extended to the spring rainy season and justify why or why not.

#### SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 3.0 Page #: 2 Line #: 23  
Comment: The second paragraph of this section states that "additional information will be analyzed to be sure that the hydrologic regime of the Forested Wetland Area is not impacted from remedial activities." The text should clarify what is meant by "hydrologic regime" and explain how the hydrologic regime could be impacted by the remedial activities.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 3.1.1 Page #: 4 Line #: 5  
Comment: The fifth sentence of the first paragraph states that "Interval sampling will cease upon establishment of a storm event specific hydrograph." The text should clarify how the hydrograph will be used to determine when to stop sampling.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: Table 1 Page #: 5 Line #: NA  
Comment: The heading "Pollutant" is used in Table 5. Because most of the "pollutants" listed are naturally occurring, the word "parameter" may be a better choice for a heading.

Commenting Organization: U.S. EPA Commentor: Saric  
Section #: 5.1 Page #: 8 Line #: 5  
Comment: The text states that "...if a sample exhibits uranium levels above the final remediation level (FRL) as established in the OU5 FS, an aliquot from the composite sample will be reanalyzed." This text should be revised to clarify the composition of the composite uranium sample. Also, the text should clarify what the composite sample represents (for example, impact to the total wetland or total impact from a particular influent or effluent).