



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

December 3, 1998

RE: DOE FEMP
APPROVAL: CONCEPTUAL WETLAND
MITIGATION PLAN

Mr. Johnny Reising
U.S. Department of Energy, Fernald Area Office
P.O. Box 538705
Cincinnati, OH 45253-8705

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 9, 1998 submittal, "Transmittal of the Revised Conceptual Wetland Mitigation Plan for Area 1 Phase 1 Mitigation Site." Ohio EPA approves the conceptual plan with the expectation that the attached comments will be addressed in the final design package. Construction timing will be of utmost importance to the success of the mitigation project. Therefore, Ohio EPA recommends DOE take all necessary actions to ensure construction begins by April 1, 1999. Additionally, Ohio EPA is ready to work with DOE and its contractors to ensure timely resolution of any comments on the final design and its implementation.

If you have any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA
Terry Hagen, FDF
Ruth Vandergrift, ODH
Mark Shupe, HSI GeoTrans
Francie Barker, Tetra Tech EM Inc.
Manager, TPSS/DERR,CO

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Ohio EPA Comments on
Conceptual Wetland Mitigation Plan

1. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:

Comment: As stated in Ohio EPA's cover letter, we are interested in expediting field work on the project to provide the highest probability for success. Ohio EPA believes an early April start of construction is essential to successfully completing the mitigation project. DOE should take the necessary steps to ensure the earliest possible start for construction. Ohio EPA is available to work with DOE to develop an acceptable detailed design package.

2. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:

Comment: Ohio EPA likes the 8 basin approach to maximizing wetland area and water retention. We are unclear on the planting strategy for the basins though. Will all basins be planted in similar mixes or will the basins vary in seeding approach? Ohio EPA would recommend different planting scenarios for the various basins. This could include a wet prairie mix in an upper basin, a sedge/smartweed planting for wading birds in another, forested wetland, etc.

3. Commenting Organization: OEPA Commentor: OFFO
Section #: General Comment Pg. #: Line #: Code: C
Original Comment #:

Comment: It is clear that there are still areas with field tile in the mitigation area. How will these be dealt with?

4. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.2.3 Pg. #: Line #: Code: C
Original Comment #:

Comment: It is assumed that some consideration will be given to local soil/environmental conditions for each of the species planted. The method described seems to preclude these considerations. How random are the randomized locations, or will there indeed be opportunity to make decisions in the field with respect to local soil/environmental conditions. The detailed design should include additional information on how decisions will be made for placement of plantings.

5. Commenting Organization: OEPA Commentor: OFFO
Section #: Section 4.5 and 5.0 Pg. #: Line #: Code: C
Original Comment #:

Comment: The monitoring should include frequency and actions to be taken in case of failure (e.g. if >20% of container stock mortality within first 2 years, replacement with in kind stock, etc.) The detailed design should include "positive change" expectations and "negative change"

corrective actions.

6. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.6.1 Pg. #: 7 Line #: Code: C

Original Comment #:
Comment: Ohio EPA's air monitor located along the east fence line will also require an area clear of trees around it. More specifically, no trees/shrubs that will exceed 1.5 meters in height should be planted within 20 meters of the air monitor.

7. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.6.5 Pg. #: Line #: Code: C

Original Comment #:
Comment: The detailed design should include additional detail on storm water control during construction. The use of temporary silt fence and other structures may be necessary. Detail on sequencing of construction and associated controls with each phase should be included

8. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.7 Pg. #: Line #: Code: C

Original Comment #:
Comment: Open water depths of one or two feet seem inadequate. Water at these depths may become quickly vegetated and seem more appropriate for the vernal pools and emergent marshy areas than the open water areas.. Section 4.2.5.1 calls out depths of eight or ten feet. This seems more appropriate.

9. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.7.1 Pg. #: Line #: Code: C

Original Comment #:
Comment: It may be best to stay away from specifying the type of compaction equipment required, but rely on the contractor to compact to the correct specification with their equipment.

10. Commenting Organization: OEPA Commentor: OFFO
Section #: 4.7.2 Pg. #: Line #: Code: C

Original Comment #:
Comment: The detailed design should include more information on water retention and discharge rate. "Hold water to the maximum extent possible" and "discharge water as slowly as possible" are too unclear (one drop of water through the outlet structure per year could fit this description).

11. Commenting Organization: OEPA Commentor: OFFO

Section #: 4.7.2 Pg. #: Line #: Code: C

Original Comment #:

Comment: The detailed design should include more information on the extent of use of organic matter, for example, will the entire basin have substantial amounts of soil amendment or only the shallow, marshy areas.

11. Commenting Organization: OEPA Commentor: OFFO

Section #: 4.7.3 Pg. #: Line #: Code: C

Original Comment #:

Comment: DOE should consider the use of coir coconut matting in some areas to facilitate growth of planted materials.

12. Commenting Organization: OEPA Commentor: OFFO

Section #: 6.0 Pg. #: Line #: Code: C

Original Comment #:

Comment: It is not clear from the list included in this section that the document will include maintenance requirements for the area. Ohio EPA expects that detail regarding required maintenance activities would be included within the design. Issues that may need addressed include the use/exclusion of mowing, spraying, invasive control, etc.

13. Commenting Organization: OEPA Commentor: OFFO

Section #: Appendix 1-Wetland Cover Types Pg. #: Line #: Code: C

Original Comment #:

Comment: Not included in the sample list are open water plants, wildlife amenities, etc., will these be included in the detailed plan?

14. Commenting Organization: OEPA Commentor: OFFO

Section #: Marsh Species Pg. #: Line #: Code: C

Original Comment #:

Comment: Based upon a review of this list, Ohio EPA would expect additional location specific plant species to be included in the detailed design.