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6-105.4

COMMENTS - NR IMPACT ASSESSMENT

12/30/96

OEPA DOE-FEMP
6
COMMENTS



State of Ohio Environmental Protection Agency

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K-0624

DEC 2 10 23 AM '97

George V. Voinovich
Governor

December 30, 1996

RE: DOE FEMP
MSL 531-0297
HAMILTON COUNTY
COMMENTS - NR IMPACT
ASSESSMENT

Fernald Natural Resource Trustees
c/o FERMCO

Dear Trustees:

As part of the on-going Natural Resource Trustee negotiations for the Fernald site, Ohio EPA has reviewed the draft Natural Resource Impact Assessment submitted to this office by FERMCO on November 7, 1996. Ohio EPA's comments on the draft document are attached. Ohio EPA is concerned that significant changes were made to the document that did not result from comments addressed in the response to comment document, therefore all future submittals should include redline/strikeout text to highlight all changes to the document. We look forward to a timely resolution of these comments.

If you have any questions, please contact me or Tim Hull.

Sincerely,

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

cc: Pete Yerace, DOE
Don Henne, U.S. DOI
Terry Hagen, FERMCO
Jim Chapman, U.S. EPA
Jim Saric, U.S. EPA
Bill Kurey, U.S. F&WS

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OHIO EPA COMMENTS ON THE
11/7/96 DRAFT NATURAL RESOURCE IMPACT ASSESSMENT

General Comments

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: General Comment Pg #: Line #: Code: M

Original Comment #:

Comment: Significant changes were made to the document which were not noted in the comment response document. Since the basis for these changes were not entirely evident, a number of Ohio EPA's comments address the changes. In future submittals the comment response document should discuss changes made that are not addressed in the specific responses and all changes should be highlighted by strikeout/redline.

Response:

Action:

Specific Comments

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1 Pg #: 2 Line #: 24-25 Code: C

Original Comment #:

Comment: The sentence beginning "It is anticipated..." should be revised to state "...will be remediated to FRL's and physically...".

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.1 Pg #: 4 Line #: 4-6 Code: C

Original Comment #:

Comment: Groundwater contamination in the GMA does not appear to be adequately addressed by the definition of future impact. Additional expansion of the groundwater plume exceeding 20ppb to the south prior to its remediation is predicted by DOE. Neither past impacts or future impacts currently account for such impacts. The document should be revised to address this increased impact.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 1.2.2 Pg #: 10 & 11 Line #: 23-28 & 1-15 Code: M

Original Comment #:

Comment: It is important to note that Ohio EPA has not concurred with this proposed strategy for addressing BTVs in the remedial design process. This issue is to be addressed within the Sitewide Excavation Plan review and comment process. If BTVs are to limit restoration habitats then that will need to be another damage which is calculated in this impact assessment. Ohio

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EPA recommends deletion of the referenced sections and replacing with a referral to the SEP.

Regarding past impacts though, the habitat types are known as well as the BTVs therefore impacts should be determined. Such impacts will continue until such time as the area is remediated. This assessment must be revised to incorporate past impacts based upon existing conditions and BTVs as well as any residual impacts resulting from not remediating such areas.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.1.1.1 Pg #: 19 Line #: 7-8 Code: C

Original Comment #:

Comment: Please revise the sentence to state, "...as a drinking water source within the zone impacted by Fernald."

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.1.1.2 Pg #: 19 Line #: Code: C

Original Comment #:

Comment: As stated previously, the impact assessment must find a mechanism to account for forward migration of the plume prior to remediation. In addition, data currently being collected by OU5 suggests Figure 2-2 may underestimate the extent of contamination in the southern direction along Willey road.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.1.2.1 Pg #: 25 Line #: Code: C

Original Comment #:

Comment: The last two paragraphs from this section in the previous draft of the document should be included in this document. The document should be revised to replace the deleted paragraphs.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.1.2.2 Pg #: 28 Line #: 11-13 Code: C

Original Comment #:

Comment: Ohio EPA disagrees with this paragraph and believes it should be deleted. Surface

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water and sediment will require remediation if they exceed the FRLs following site remediation. In addition, not cleaning them up only further emphasizes the need to include them in the impact assessment. Surface water and/or sediment currently exceeding FRLs or BTVs (e.g., pilot plant drainage ditch) should be included as past impacts and counted until such time as they meet the FRL or BTV.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2.1 Pg #: 28 Line #: Code:C

Original Comment #:

Comment: a) The section should be revised to include impacts to drainages entering Paddy's Run (e.g., Pilot Plant drainage ditch, SSOD, etc.).

b) The section should be revised to include past impacts from stream alterations resulting from waste placement or encroachment on waste. As suggested by Facemire et al., these alterations likely impacted species diversity and continue to affect it.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2.1 Pg #: 28 Line #: 20-23 Code:C

Original Comment #:

Comment: It is unclear to Ohio EPA how based on the changes to the previous document and Ohio EPA's comments on the initial draft, the impact remains at nine acres.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.2.2 Pg #: 46 Line #: 6-8 Code:C

Original Comment #:

Comment: Figure 1-3 does not support this conclusion. In fact it suggests contamination within Paddys Run corridor in excess of current BTVs in areas to be remediated and not to be remediated. The section and associated impact assessments should be revised.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 2.3.1 Pg #: 49 Line #: 5-6 Code:C

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Original Comment #:

Comment: Is DOE suggesting in this conclusion that additional data needs to be collected to properly assess any impacts to small mammal populations?

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: Figure 2-8 Pg #: 54 Line #: Code:C
 Original Comment #:

Comment: a) This figure is a good addition to the document but does not address residual impacts sufficiently. The figure should be revised to show residual impacts for the site based upon Figure 1-3 all black dots not encompassed within extent of excavation grids should be assessed as residual impacts.

b) Please describe the method used to determine the areas of residual impact defined on this figure. It does not appear that the areas on Figure 2-8 match the black dots on Figure 1-3. In addition how the areas around a given point were krieged should be discussed in a comment response.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 2.5.1 Pg #: 55 Line #: 27-28 Code:C
 Original Comment #:

Comment: Please include acreage of the removed woodlot.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: 3.0 Pg #:61 Line #: Code:C
 Original Comment #:

Comment: The section should be revised as described in above comments to address: residual impacts, past impacts from stream alterations, and impacts (past, future, residual) to drainages into Paddys Run.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

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Section #: 3.0 Pg #: 62 Line #: Code:C

Original Comment #:

Comment: The total area of impact (past & future) shown on Figure 2-6 would appear to be much greater than 37 acres. Please describe or show on a figure how the 37 acres are calculated/located.

Response:

Action:

Commenting Organization: Ohio EPA Commentor: OFFO

Section #: 3.0 Pg #: 64 Line #: Code:C

Original Comment #:

Comment: Include residual impacts from Figure 2-8 within this section.

Response:

Action: