



State of Ohio Environmental Protection Agency

Southwest District Office

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George V. Voinovich
Governor

January 15, 1998

RE: DOE FEMP
COMMENTS: OU4 SUPPLEMENTAL
PROJECT - HABITAT AREA

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 December 29, 1997 document, "Submittal of the Revised Draft Habitat Area Supplemental Project Plan for Operable Unit 4." Ohio EPA concurs with the goal of establishing a habitat area and believes it will provide opportunities for public education and experience in site restoration. Following are Ohio EPA comments concerning the proposed project:

- 1) Commenting Organization: OEPA Commenter: OFFO
Section #: Table 1 Pg. #: Line #: Code: C
Original Comment #:
Comment: a) Please provide a reference for the recommended seeding rates.
b) Ohio EPA recommends replacement of annual rye grass with Canada Wild Rye (*Elymus canadensis*). Canada Wild Rye is a native plant which shows promise as a nurse crop (Whitney, Bill. Restoration & Management Notes, Winter 1997 pg126-137). If successful it may be appropriate to consider Canada Wild Rye as a standard seed for temporary cover during remediation.
c) Include Side Oats Gamma (*Bouteloua curtipendula*) in the grass mix. It is another native typically included in prairie mix with a lower growing nature than the other proposed grasses.

- 2) Commenting Organization: OEPA Commenter: OFFO
Section #: Table 2 Pg. #: Line #: Code: C
Original Comment #:
Comment: a) The table should include a date for submittal of the certification design letter.
b) Efforts should be made to reduce the time required to complete certification and design. Additionally, to the extent possible planting could occur prior to September 15 for some plants if effort was made to provide watering when necessary.

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3) Commenting Organization: OEPA Commenter: OFFO
 Section #: Figure 1 Pg. #: Line #: Code: C
 Original Comment #:

Comment: a) The text references possible use of seedling trees, neither the text nor the figure define which trees would be planted as seedlings. Ohio EPA recommends the use of samplings exclusively to ensure a high survival rate and to provide the immediate habitat envisioned when defining the supplemental project. Additionally, size requirements for the shrub and wildflower specimens should be included

b) Ohio EPA recommends significantly reducing the number of Honeylocust trees planned. Due to the thorny nature of these trees, they are not well suited for public access areas of such limited size. For those specimens retained, removal from areas adjacent to the path is necessary.

c) Ohio EPA recommends replacement of Honeylocust trees with specimens of the following:

Bitternut Hickory (*Carya cordiformis*)

Beech (*Fagus grandifolia*)

Sassafras (*Sassafras albidum*)

Sycamore (*Platanus occidentalis*)

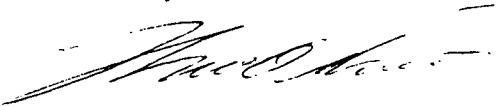
These trees are likely to be included in future restoration efforts so it will be good to provide the public access to examples of them. Additionally, all four species provide wildlife forage.

d) Consistent with a request from a member of the Fernald Citizens Advisory Board, Ohio EPA recommends inclusion of specimens of the Butternut (*Juglans cinerea*) tree. Additionally, this tree will provide wildlife forage.

e) The figure should be revised to identify existing tree types within the habitat area.

If you have any questions, please contact me.

Sincerely,



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

cc: Jim Saric, U.S. EPA
 Terry Hagen, FDF
 Ruth Vandegrift, ODH

Manager, TPSS/DERR, CO
 Francie Barker, Tetra Tech EM Inc.
 Mark Shupe, HSI GeoTrans