



State of Ohio Environmental Protection Agency

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George V. Voinovich
Governor

March 19, 1998

RE: DOE FEMP
PRELIMINARY WETLAND
MITIGATION ASSESSMENT

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 January 13, 1998 submittal, "Transmittal of the Draft Preliminary Wetland Mitigation Assessment" and would like to make the following observations. It is Ohio EPA's view that there are two universes of wetland construction to take place on the site. One is the wetland mitigation addressed by the Preliminary Wetland Mitigation Assessment to compensate for the ten acres of wetlands on site to be impacted by remediation activities. These are addressed under Section 404 of the Clean Water Act and are being mitigated at 1:1.5. The other universe of wetlands we perceive are those addressed by the Natural Resource Trustees under the Natural Resource Restoration Plan. There may be some overlap between the two, however we basically perceive them as two different actions. With respect to the Natural Resource Restoration Plan actions, both long term and near term restoration goals have been developed. With respect to the Preliminary Wetland Mitigation Assessment goals, Ohio EPA desires all actions to occur in the near term. Ohio EPA feels that these actions will be driven primarily by the need to certify the areas in which mitigative efforts occur. Considering this, construction should occur as quickly as feasible. Ohio EPA appreciates the need for a basic understanding of the soils and hydraulic budget for construction of these wetlands, but does not believe that, for these 15 acres of wetlands, exhaustive studies are warranted. It is our desire to have them in place, and then use them to further our knowledge of mitigated wetlands on the site so that knowledge may be used to develop criteria for the performance of wetlands constructed under the Natural Resource Restoration Plan. We also feel it is important to demonstrate good faith in restoration of the site by having some demonstrable mitigative action as early as possible. It has been the hope of Ohio EPA that these mitigative wetlands would be a part of that demonstrative action. Therefore we encourage the construction of as much enhancement of the northern woodlot wetlands as the Natural Resource Section of Fluor Daniel Fernald recommends with supplemental wetlands constructed in the Area 1 Phase I sediment traps, basins and borrow areas. And we encourage beginning construction of these wetlands expeditiously. We feel that

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many judgements in the construction of these wetlands will need to be made in the field during construction due to the nature of wetlands. Further delays for data gathering and analysis, although valuable, seem less prudent than actually getting under construction to have some "real" mitigative progress underway.

If you have any questions, please contact me or Joe Bartoszek.

Sincerely,



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

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