



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

April 3, 1998

RE: DOE FEMP  
COMMENTS: WORK PLAN FOR  
ECOLOGICAL RESTORATION  
RESEARCH GRANTS

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 the DOE document, "Work Plan for Ecological Research Grants, Operable Unit 4 Supplemental Project" received on March 27, 1998. Ohio EPA approves of the proposed research activities and believes DOE should move forward with implementation. However, the following comments address needed revisions to the work plan and subsequent task orders:

1) Commenting Organization: OEPA Commenter: OFFO  
Section #: 3.1.2 Pg. #: 3 Line #: 6-14 Code: C  
Original Comment #:

Comment: Ohio EPA is concerned with the use of the northern woodlot for as a reference location regarding seedlings/sapling density and composition. The effect of grazing on these measures would be significant. Ohio EPA recommends use of an additional reference location potentially at Whitewater park or at the proposed conservation easement property if acceptable to the landowner. Additionally, a literature search will be important to understanding similar projects and building upon lessons already learned.

2) Commenting Organization: OEPA Commenter: OFFO  
Section #: 3.1.2 Pg. #: 3 Line #: 16-34 Code: C  
Original Comment #:

Comment: Ohio EPA is concerned about the effect deer browsing will have on planting success. Specifically cultivation of the field may result in making the seedlings being more obvious to deer. A similar effect appears to have occurred in a recent study presented in the March 1998 Restoration Ecology article, "Effects of Deer Browsing, Fabric Mats, and Tree Shelters on *Quercus Rubra* Seedlings." Ohio EPA recommends the task order contain a significant literature search on deer browsing impacts and suggests incorporation of cover crop seeding and tree

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shelters into the research project.

3) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.2.2 Pg. #: 5 Line #: 11-13 Code:C

Original Comment #:

Comment: Tilling may not be required in undisturbed areas such as this when a seed drill is used. DOE should incorporate a test plot where multiple herbicide applications followed by the use of the seed drill and no tilling is evaluated.

4) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.2.2 Pg. #: 5 Line #: 23-27 Code:C

Original Comment #:

Comment: In the response to USEPA comments the use of forbs in seeding is discussed but not referenced within the document. Ohio EPA recommends that the out years in this project include an evaluation of methods to establish forbs within the previously established prairie grasses.

5) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.3.2 Pg. #: 8 Line #: 1-4 Code:C

Original Comment #:

Comment: The use of sewage sludge presents some potential problems with regard to heavy metal content and FRLs. Ohio EPA recommends evaluation of suitable alternatives to this material (e.g., livestock waste, mushroom compost, etc.).

6) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.4.2 Pg. #:11 Line #: 8-11 Code:C

Original Comment #:

Comment: This project specifically references the use of photographic documentation of the project. Ohio EPA recommends a similar requirement be incorporated into all the research projects/task orders.

7) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.5.2 Pg. #: 13 Line #: 4-8 Code:C

Original Comment #:

Comment: The use of the May/June time frame for field work may limit the possible control methods such as early spring herbicide application to honeysuckle. Ohio EPA recommends field work be based upon the optimum time considering the selected control techniques.

8) Commenting Organization: OEPA Commenter: OFFO  
 Section #:3.5.4 Pg. #: 14 Line #: 15 Code:C

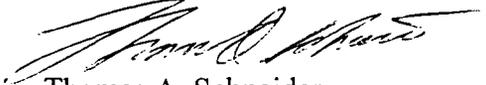
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Original Comment #:

Comment: Submittal of the experimental plan in May 1999 is not acceptable given field work is planned to start that month. Ohio EPA recommends a significantly earlier submittal date (eg., Feb. 99) to ensure that adequate reviews by both DOE and the EPAs is possible.

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