

5-106.41



State of Ohio Environmental Protection Agency

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FILE: 5412

George V. Voinovich  
Governor

December 1, 1998

RE: DOE FEMP  
COMMENTS IEMP  
OCTOBER 1998

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

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the Integrated Environmental Monitoring Plan for October 1998.

If you have any questions, please contact me at (937) 285-6466 or Donna Bohannon at (937) 285-6453.

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, Inc.  
Francie Hodge, Tetra Tech EM Inc.  
Manager, TPSS/DERR,CO

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**INTEGRATED ENVIRONMENTAL MONITORING PLAN  
OCTOBER 1998**

**ENCLOSURE**

- 1) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: Enclosure Table/3.2.2                      Pg#: 1                      Line#:                      Code: C  
Comment: Approval of the revised DF&O's is performed by central office Division of Hazardous Waste Management. Until they accept the revised orders, they must be considered draft and unapproved.
  
- 2) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: Enclosure Table 1/3.5.22                      Pg#: 6                      Line#:                      Code: C  
Comment: Approval of the revised DF&O's is performed by central office Division of Hazardous Waste Management. Until they accept the revised orders, they must be considered draft and unapproved.

**GENERAL COMMENTS**

- 3) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: General    Pg. #:                      Line #:                      Code: C  
Original Comment #:  
Comment: The IEMP is fairly clear on the boundaries of what monitoring is included under the IEMP. An issue still exists as to project specific monitoring for air contaminants. The document states that these types of monitoring will be included in project RD and RA documents, but history has shown that this is not the case, or the projects defer to the IEMP. This issue needs to be resolved within DOE to the satisfactions of OEPA.

**COMMENTS**

- 4) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 1.2                      Pg. #: 1-2 to 1-3                      Line #: 16-38 to 1-4                      Code: C  
Original Comment #:  
Comment: One of the important program objectives would appear to be addressing stakeholder concerns, particularly in light of the site history. Although alterations made to the plan based on stakeholder expectations are mentioned under Section 1.4, Plan Organization, (page 1-8, line 15), it seems appropriate to list this under Section 1.2, Program Objectives and Scope.

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- 5) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 1.2 Pg #: 1-3 Line #: 31-33 Code: C  
 Original Comment #:  
 Comment: The IEMP and subsequent sections do not indicate how the project-specific results will be factored into the sitewide interpretations. Please provide additional information on how project-specific results will be factored into sitewide interpretations.
- 6) Commenting Organization: Ohio EPA Commentor:OFFO  
 Section #: 1-4 Pg #: 1-6 Line #: 35 Code: c  
 Comment: The Surface Water and Treated Effluent Monitoring Program Section should also include reporting of treated effluent volumes, total uranium mass and concentrations in the effluent and excursions from the surface water treatment priority scheme.
- 7) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 1.3 Pg. #: 1-5 to 1-6 Line #: Code: C  
 Original Comment #:  
 Comment: It is not within the purview of the IEMP to define the limits of project specific monitoring.
- 8) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 1.3 Pg. #: 1-5 Line #: 8-18 Code: C  
 Original Comment #:  
 Comment: The meaning of this paragraph was extremely difficult to interpret. It appears to mean that project specific monitoring will only be required if specified by the IEMP. It also refers to ARAR analysis in the media-specific sections of the IEMP, and that the project specific monitoring will be specified in the media-specific ARAR analysis within the IEMP.

It is assumed that the ARAR analysis referred to is the *Regulatory Drivers and Responsibilities* Tables which are in the media specific sections of the IEMP. These do not appear to be ARAR analyzes and are incomplete even as lists of regulatory drivers. For example, Table 4-1 does not list anything from the Ohio Water Quality Standards (e.g., OAC 3745-1-04, which could apply to non-NPDES regulated outfalls), Federal Water Quality Criteria, 10 CFR 1022, CWA 401, etc., which should be included in an ARAR analysis.

It is not appropriate for the IEMP to state what project specific monitoring will be required. The extent and complexity of the remedial activities make it impossible to know in advance what monitoring activities may or may not be required. It is possible to state what the minimum monitoring requirements of the projects may be, but not be exclusive of any other potential conditions that are unknown at this time.

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- 9) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 1.3 Pg. #: 1-5 Line #: 28-30 Code: E  
 Original Comment #:  
 Comment: There appears to be a typo in this sentence, perhaps *and* should read *by*.
- 10) Commenting Organization: Ohio EPA Commentor:OFFO  
 Section #: 1.5.1 Pg #: 1-9 Line #: Code: c  
 Comment: This section outlines management decisions that will be supported by the IEMP. There is no mention of using data collected to evaluate the effectiveness of ALARA practices at the FEMP.
- 11) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 1.5.1 Pg. #: 1-10 Line #: 4-5 Code: C  
 Original Comment #:  
 Comment: This statement (line 4-5) says that project specific monitoring will be upgraded. Again, remedial activities make it impossible to know in advance what monitoring activities may be required and even more difficult to determine the type of upgrade necessary.
- 12) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 1.5.2 Pg. #:1-10 to 1-11 Line #: 29-38 & 1-5 Code: C  
 Original Comment #:  
 Comment: Ohio EPA would like to be informed of any unexpected upward trends of unusual results, or changes in monitoring stations, equipment, methods, etc. as soon as practical. Waiting until receipt of the quarterly report with the appropriate data may be more than six months after the unexpected result was discovered by the site. A more timely information exchange is desirable.
- 13) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: Section 3.0 Pg.#: Line #: Code: G  
 Comment: The groundwater model assessment in the groundwater data evaluation section (Section 3.0) focuses only on data collected as a result of the IEMP. Groundwater data collected as a result of other FEMP projects should also be discussed with respect to its use in adjusting the model calibration.
- 14) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 3.3 Pg#: 3-10 Line#: Code: C  
 Comment: This section should include a discussion of the responsibility boundary between IEMP and OU1 remediation activities. This is discussed in section 3.5.1.4, but not referenced



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- 16) Commenting Organization: OEPA Commentor: OFFO  
 Section #: 3.5.2.2 Pg#: 3-55 Line#: paragraph one, last sentence Code: E  
 Comment: Remove "Verbal concurrence has been received by the OEPA although," from the last sentence.
- 17) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: 3.5.1.6 Pg#: 3-50 Line #: 4 Code: C  
 Comment: The well locations' presented for routine water level monitoring are, with only a few minor exceptions, located within the capture zone predicted by particle tracking modeling. Limiting well locations to the inside of the calculated capture zone does not allow for verification of the groundwater divide locations along large portions of the plume's eastern and southern boundaries. Some actual groundwater water level measurements confirming the capture zones that are claimed in the IEMP quarterly reports are needed.
- 18) Commenting Organization: OEPA Commentor: OFFO  
 Section#: 3.6.5 Pg#: 3-74 Line#: paragraph two  
 Comment: How long will it take to enter the data into the controlled database once the validated data is received from the lab?
- 19) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: 3.7.1 Pg#: 3-79 Line #: 26 Code: E  
 Comment: Change "Kallman" to "Kalman."
- 20) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: 3.7.1 Pg#: 3-81 Line #: 9 - 12 Code: C  
 Comment: There is no discussion regarding recalibration of the flow model, just the transport model. In a recent meeting, DOE has committed to recalibration of the flow model using the data obtained in the installation and testing of almost 20 wells which comprise the current reinjection and pumping modules.
- 21) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: 3.7.1 Pg#: 3-81 Line #: 30 Code: C  
 Comment: The establishment of target water levels for each monitoring well for use in a model calibration should also take into consideration the effects resulting from the pumping and reinjection remediation modules.

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- 22) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: 3.7.1 Pg #: 3-82 Line #: 1 Code: c  
Comment: The text states that five feet will be the criterion used to judge the agreement of modeled and measured groundwater elevations. How was five feet chosen as the criterion? What is generally accepted as satisfactory agreement for aquifers of this type? We seem to recall that the SWIFTS model generally predicted groundwater elevations to within one foot.
- 23) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section #: 3.7.1 Pg.#: 3-82 Line #: 4 Code: C  
Comment: The text indicates that the decision to recalibrate will be based whether or not two-thirds of the modeled water levels are within five feet of field values for two consecutive quarters. These criteria are too broad and will do little to maintain an accurate model calibration. Specifically, as it is presented in the text, the recalibration assessment gives no consideration to the spatial distribution of the errors. In one area of the model, all of the calibration points may exceed the five foot criteria indicating that groundwater flow is not accurately simulated in that area. No recalibration, however, would be performed if the number of wells in the area is fewer than two thirds of the total. In addition, no mention is given to use of the transient data collected during remediation module startup. During startup of the reinjection demonstration module, for example, groundwater levels were monitored on a weekly schedule until overall stabilization of water levels in the aquifer was achieved. This data and similar data collected during startup of the south field and south plume optimization modules provide an excellent opportunity for verification of the flow calibration. The quality of the calibration should be defined based on the spatial distribution of the errors and on the root mean square error, sum of the squares, or equivalent statistic.
- 24) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section #: 3.7.1 Pg.#: 3-82 Line #: 17 Code: C  
Comment: The assessment of transport model performance should entail more than a simple comparison of actual versus predicted concentrations. The model should also be evaluated by comparing actual versus predicted extraction well concentrations, mass removed versus mass in place, and an assessment of the model's capability to predict the plume's general configuration.
- 25) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
Section #: 3.7.2 Pg.#: 3-85 Line #: 27 Code: C  
Comment: The operational assessment should be revised to include a graphic record of the pumping (or reinjection) rate of each well as a function of time for each quarterly monitoring period.

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- 26) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 4.2                      Pg. #: 4-2 to 4-6                      Line #:                      Code: C  
 Original Comment #:  
 Comment: The IEMP places great importance on the regulatory and to-be-considered requirements. As such, it is particularly important to include all relevant and appropriate and to-be-considered requirements in the IEMP. However, the results in 4.2.2 and Table 4-1 fall short of this. For example, the Ohio Water Quality Standards, OAC 3745-1-04, contains what is known as the *free flows*. Although it does not specifically contain a monitoring component, the only way to know if the requirement is being met is through monitoring. More consideration is needed in this section with emphasis placed on ARARs and TBCs.
- 27) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 4-2                      Pg. #: 4-4                      Line #: 20-22                      Code: C  
 Original Comment #:  
 Comment: It is not within the purview of the IEMP to define the limits of project specific monitoring.
- 28) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 4.3                      Pg. #: 4-7                      Line #: 21-26                      Code: C  
 Original Comment #:  
 Comment: It is assumed that the programmatic line of demarcation described here is between controlled and non-controlled areas. However, this is not specifically indicated.
- 29) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 4.4.1                      Pg. #: 4-10                      Line #: 20-23                      Code: C  
 Original Comment #:  
 Comment: This same bullet was in the August 4, 1997 revision of the IEMP. Aren't there enough data at this time to make this determination?
- 30) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 4.4.1                      Pg #: 4-10                      Line #:                      Code: c  
 Comment: This Section lists the program expectations and design considerations for the surface water and treated effluent monitoring program. Add a bullet that lists documenting that flows to the treatment modules are being prioritized with the highest concentration streams being treated first.

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- 31) Commenting Organization: OEPA Commentor: OFFO  
Section #: 4.4.2.3 Pg. #: 4-18 Line #: 6 Code: C  
Original Comment #:  
Comment: It had been stated previously that the IEMP would also examine the actual flow in the Great Miami River to see if a lower flow rate would be appropriate to determine BTV or FRL exceedences during certain times of the year.
- 32) Commenting Organization: OEPA Commentor: OFFO  
Section #: 4.4.2.4 Pg. #: 4-18 Line #: Code: C  
Original Comment #:  
Comment: Nothing is indicated in this section to monitor surface water flows from the Waste Treatment Plant excavation area. Are there any plans to monitor this area during remediation of the old waste water plant?
- 33) Commenting Organization: OEPA Commentor: OFFO  
Section #: 4.4.2.5 Pg. #: 4-22 to 4-23 Line #: Code: C  
Original Comment #:  
Comment: Many samples have been collected under the IEMP to date. What will be the criterion to determine a sufficient number of samples having been collected to assess the constituents addressed in this section?
- 34) Commenting Organization: OEPA Commentor: OFFO  
Section #: 4.4.3 Pg. #: Table 4-3 Line #: Code: C  
Original Comment #:  
Comment: All monthly monitoring has been deleted from the schedule. The approval of the OU1 RAP was contingent on the IEMP continuing to monitor SWD-03 on a monthly basis, yet this table indicates that monitoring has been reduced to quarterly. This change is unacceptable to Ohio EPA and we are very surprised to see it. There are new flow regresses to the SSOD through A1PII, yet the sampling for the SSOD has also been reduced to quarterly. It would seem prudent to continue monthly monitoring here during the life of this revision of the IEMP. Table 1, the Summary of Technical Changes provided within the document, indicates that some monthly monitoring will continue, yet Table 4-3 does not indicate this.
- 35) Commenting Organization: OEPA Commentor: OFFO  
Section #: Figure 5-2 Pg. #: 5-11 Line #: Code: C  
Original Comment #:  
Comment: Is location G4 the location of the downstream of an effluent sample or is it actually taken on the other side (west) of the river?

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- 36) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.1 Pg. #: 6-2 Line #: 26 Code: C  
Original Comment #:  
Comment: Add Silo 3 to the radon emission sources.
- 37) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.2.2 Pg. #: 6-4 Line #: 33-41 Code: C  
Original Comment #:  
Comment: Although 10 CFR 834 has not been promulgated, the 0.5 pCi/L above background level should be used as an action level for DOE to investigate the source(s) causing increased radon concentrations at the fence line.
- 38) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.4.2 Pg. #: 6-20 Line #: 1--7 Code: C  
Original Comment #:  
Comment: Ohio EPA recommends using the 0.5 pCi/L above background level at the fence line as an action level for the DOE to investigate increased radon concentrations. The 0.5 pCi/L above background level is cited as an ARAR in the OU5 ROD.
- 39) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.4.2 Pg. #: 6-20 Line #: 12 Code: C  
Original Comment #:  
Comment: The text mentions that an additional monitoring location was added at the predicted maximum concentration location. Please clarify which location it is.
- 40) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.4.2 Pg. #: 6-20 Line #: 17-18 Code: C  
Original Comment #:  
Comment: Any changes to the program design should be approved prior to implementation by the Ohio EPA and USEPA.
- 41) Commenting Organization: OEPA Commentor: OFFO  
Section #: 6.5.2.1 Pg. #: 6-27 Line #: Code: C  
Original Comment #:  
Comment: Ohio EPA recommends that independent audits of air flow through the air samplers be conducted periodically. The Ohio EPA, Division of Air Pollution Control (DAPC), has personnel trained in performing audits of high volume air samplers.

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- 42) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 6.6.1.2      Pg. #: 6-39                      Line #: 1      Code: C  
Original Comment #:  
Comment: Include the median of hourly radon concentrations as a part of the descriptive statistics.
- 43) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 6.4.2.2      Pg. #: General                      Line #:      Code: C  
Original Comment #:  
Comment: Ohio EPA believes that this section should state that the alpha track-etch cups will no longer be used under the IEMP. This is a major change from previous environmental monitoring plans and should be included within this document.
- 44) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 7.2.2      Pg. #: 7-2                      Line #: 28      Code: E  
Original Comment #:  
Comment: The secondary pathways listed in this sentence appears to contain a typo. *Sediment* is specified when *soil* should be in its place.
- 45) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 7.4.2      Pg. #: 7-6                      Line #: 21      Code: E  
Original Comment #:  
Comment: *EMP* is used in this sentence instead of *IEMP*.
- 46) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 7.4.3      Pg. #: 7-6                      Line #: 36      Code: C  
Original Comment #:  
Comment: The sentence states, that biota monitoring locations were selected on the basis of being *next to or near* Fernald. What guideline was used to determine this and how far, in miles, is *near* (i.e., 5 mile radius used for background)?
- 47) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:      8.2.2      Pg #: 8-3      Line #: 1      Code: c  
Comment: To be consistent with Section 3.7.1, a sentence should be added to include VAM3D model calibration as one use of the groundwater monitoring data.

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- 48) Commenting Organization: OEPA                      Commentor: OFFO  
 Section #: 8.2.3              Pg. #: 8-4                      Line #: 19-28                      Code: C  
 Original Comment #:  
 Comment: Please revise the text. Ohio EPA is no longer operating under the AIP. The existing mechanism between Ohio and DOE is the Cost Recovery Grant (CRG).
- 49) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
 Section #: 8.3.3, Figure 8-1      Pg. #: 8-6                      Line #: 7                      Code: C  
 Comment: Figure 8-1 is confusing in that it suggests that a report will be issued at the end of each quarter with that quarter's monitoring results. In reality, there is an approximately 90-day lag time between data collection and the issuance of the report. The figure should be revised to show the actual release date for each quarter's monitoring report or should note that the figure's symbols denote the end of the data collection period for each quarter and that there is a lag time for reporting.
- 50) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
 Section #: 8.3.3                      Pg. #: 8-6                      Line #: 7                      Code: C  
 Comment: This section should include a figure that shows the eight future quarterly reports for 1999 and 2000 and indicates which of the five groundwater restoration modules will be included in each report.
- 51) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
 Section #: Appendix A              Pg. #: N/A                      Line #: N/A                      Code: G, E  
 Comment: The terms "MP," "N," "<," and ">" are defined multiple times in Appendix A. For clarity and readability, the text should define these terms only on first occurrence and use the short hand abbreviation for all subsequent occurrences.
- 52) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
 Section #: Appendix A              Pg. #: A-6                      Line #: 21                      Code: E  
 Comment: Change "aquifer" to "qualifier."
- 53) Commenting Organization: OEPA                      Commentor: HSI GeoTrans, Inc.  
 Section #: Appendix A              Pg. #: A-7                      Line #: 10                      Code: C  
 Comment: For the four FRL constituents with method detection limits above the FRL, it is not clear in the text what is meant by the statement "These four constituents were categorized as either having an exceedance or not having an exceedance based upon criteria presented in the previous section." It is not obvious how the previous section criteria were applied to reach this conclusion.

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- 54) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: Appendix A Pg.#: A-13 Line #: 41 Code: C  
 Comment: The IEMP (or alternatively, the IEMP annual summary report) should include a table summarizing the FRL constituents that have experienced a change in mobility/persistence characteristic over the period of record. Although it is recognized that the quarterly reports will present any change in status for each constituent, a historical summary of the changes in the IEMP will be a useful tool for tracking changes in monitoring frequency. The table should note the most recent monitoring interval (year or quarter, depending on constituent) that the status change occurred.
- 55) Commenting Organization: OEPA Commentor: HSI GeoTrans, Inc.  
 Section #: Appendix A, Table A-1 Pg.#: A-15 Line #: N/A Code: E  
 Comment: The notation "NA" should be defined in the table footnotes.
- 56) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: C.1 Pg #: C-1 Line #: 13-21 Code: C  
 Original Comment #:  
 Comment: This paragraph completely undermines and fails to show how ALARA will be applied to the site, public and the environment. Please provide a section in the IEMP of how ALARA will be implemented as it applies to environmental media and doses to the public. DOE Order 5400.5 Chapter I (4) states, "...this Order adopts the ALARA process in planning and carrying out all DOE activities."
- 57) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: C.2.1 Pg #: C-2 Line #: 34-38 Code: C  
 Original Comment #:  
 Comment: The dose from radon emitted from the site has previously been reported in the site environmental reports. The information is important, and relevant as the site begins remediation of radon producing wastes.
- 58) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: C.3.1.1 Pg #: C-4 Line #: General Comment Code: C  
 Original Comment #:  
 Comment: The IEMP leaves the impression that feed back to the projects will not occur unless a site-wide limit is likely to be exceeded. ALARA would indicate that tracking and trending is used as a method to keep emissions ALARA. The project specific monitoring is the best method for ensuring that emissions are ALARA.

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- 59) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: C.3.1.1 Pg #: C-5 Line #: 10-29 Code: C  
Original Comment #:  
Comment: This section should refer to 40 CFR 61, Subpart H, 10 mrem limit for the air pathway.
- 60) Commenting Organization: Ohio EPA Commentor: OFFO  
Section #: C.3.3 Pg #: General Comment Line #: Code: C  
Original Comment #:  
Comment: Please provide a generic equation and specific example for how quarterly and annual dose estimates for the air pathway will be calculated.
- 61) Commenting Organization: OEPA Commentor: OFFO  
Section #: Appendix D, D.4.1.2 Pg. #: D-9 Line #: 10-17 Code: C  
Original Comment #:  
Comment: Ohio EPA recommends DOE conduct a baseline Indiana Brown Bat survey around Area 8 Phase 2 prior to initiating restoration activities. This information will be useful for assessing any impacts restoration may have as well as determining if the bats are currently utilizing the area.
- 62) Commenting Organization: OEPA Commentor: OFFO  
Section #: Appendix D, D.4.2 Pg. #: D-11 Line #: Code: C  
Original Comment #:  
Comment: a) The text should be revised to discuss the wetland impacts that will be occurring in Area 1 Phase 2 and the wetland delineation which must occur there in the near term.  
b) The section should discuss that the quarterly IEMP reports should report new wetland delineations as well as any wetland impacts occurring in the previous quarter.  
c) The text should state that quarterly IEMP reports will report wetland mitigation success monitoring data unless DOE is planning to submit this as a separate report.
- 63) Commenting Organization: OEPA Commentor: OFFO  
Section #: Appendix D, D4.4 Pg. #: D-11 Line #: Code: C  
Original Comment #:  
Comment: The text should be revised to state that the quarterly IEMP reports will include monitoring data as required by the individual natural resource restoration design packages.

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- 64) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: Attachment D.1, D.2.2                      Pg. #: D.1-5    Line #:                      Code: C  
Original Comment #:  
Comment: DOE's concept of "Refuge Preservation" is seriously jeopardized by the continued impact on Paddys Run within this area by cattle. As previously stated, Ohio EPA believes the continued grazing of the area by cattle is negatively impacting DOE's ability to conduct restoration. Therefore, DOE's strategy on impacts of grazing on the "Refuge Preservation" only further supports Ohio EPA's recommendation to expedite an end to grazing in the area.