



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

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MAR 29 12 45 PM '93

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REPLY TO THE ATTENTION OF

MAR 29 1993

Mr. Johnny W. Reising
 United States Department of Energy
 Feed Materials Production Center
 P.O. Box 398705
 Cincinnati, Ohio 45239-8705

SRF-5J

RE: A1.P1 Wetland
 Mitigation Design

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) wetland mitigation design for Area 1, Phase 1 (A1,P1).

The document includes the design of a 6-acre wetland consisting of eight cascading basins, a form of wetland believed to have been present in the area prior to agricultural disturbances. Successful implementation of this wetland mitigation design would satisfy a portion of U.S. DOE's regulatory commitment of 15 acres of wetland mitigation.

Generally, U.S. EPA found the design to be technically sound and U.S. DOE should continue with construction activities of the wetland design. However, the document does contain inconsistencies. Although U.S. EPA's attached comments should not suspend field activities, U.S. DOE should address the comments to clarify various issues in the document.

Therefore, U.S. EPA approves the conceptual wetland mitigation design.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 17 Line #: 16
 Original Specific Comment #: 15
 Comment: The text identifies "marsh (herbaceous)" as a wetland cover type covering 2.74 acres. However, Appendix 2, Sheet 1 does not show a "marsh (herbaceous)" cover type but instead shows wet meadow. The plan should be revised to resolve this inconsistency (see Original Specific Comment 12).

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 17 Line #: 22
 Original Specific Comment #: 16
 Comment: The text identifies a herbaceous marsh seed application rate of 20 pounds per acre. However, the text does not indicate whether this application rate includes a nurse or cover crop. The 20 pound per acre application rate appears to be excessive. Revegetation could be achieved with a 13 pound per acre marsh seed application rate and a 5 pound per acre cover crop application rate. The text should be revised accordingly.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 18 Line #: 22
 Original Specific Comment #: 17
 Comment: The text identifies a seed application rate of 20 pounds per acre but fails to indicate the percentage of forbs and the percentage of grasses in the mix. The text should specify these percentages and should provide a rationale or cite a reference to support the proposed mix.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 19 Lines #: 1 through 4
 Original Specific Comment #: 18
 Comment: The text indicates that clumps of shrub species will be planted in the shrub swamp patch. The text should clearly explain whether the areas between the clumps will be planted with herbaceous vegetation or simply mulched. If the areas are to be mulched only, the text should explain how this approach will meet the mitigation goals.

Commenting Organization: U.S. EPA Commentor: Saric
 Section #: NA Page #: 21 Lines #: 1 through 3
 Original Specific Comment #: 19
 Comment: The text indicates that each sand pile will consist of 1 cubic yard of sand placed in an 8-inch depression. The text also indicates that each sand pile will be about 4 feet across and will project about 10 inches above the surrounding soil. This information is inconsistent with Appendix 2, Figure 7, which indicates that each pile will consist of 2 to 4 cubic yards of sand placed in a 12-inch depression and will extend 6 inches above the surrounding soil. The text or figure should be revised to resolve this inconsistency.

Commenting Organization: U.S. EPA Commentor: Saric
Figure #: 7 Page #: NA Lines #: 1 and 3
Original Specific Comment #: 34
Comment: The figure provides sand pile dimensions different from those listed on Page 9. Original Specific Comment 30 applies here as well and should be addressed.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 1 through 3 Page #: NA Lines #: NA
Original Specific Comment #: 35
Comment: Sections 1 through 3 are figures showing proposed installation features. These sections show deer fencing extending across open water in basins 2, 3, and 4. The text should explain the placement of deer fencing in this manner. In addition, although the sections show goose line placement, it is extremely difficult to see the exact locations of the goose line on the color copies of the sections. The sections should clearly depict these locations. Moreover, each section legend should include the proposed cover types, and the sections should show the water flow direction and the water control structure elevations.

**SPECIFIC COMMENTS ON
APPENDIX 3: MONITORING/MANAGEMENT PLAN**

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 3 Lines #: 30 through 38
Original Specific Comment #: 36
Comment: The text states that the landscape contractor and earthwork contractor will work under U.S. Department of Energy and Fluor Daniel Fernald supervision and oversight and will have no responsibilities for the quality of work performed. The text should provide a clear justification for this statement. In addition, the text should clarify whether this approach has been agreed to by the parties involved and should clearly state how this approach will impact seed and plant guarantees as well as resolution of any potential grading or hydrology issues.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 4 Line #: 21
Original Specific Comment #: 37
Comment: The text requests advisement on the question of holding the upland vegetation stock to the 80 percent survival rate standard. It is unnecessary to hold the upland vegetation to the 80 percent survival rate standard in order to meet the mitigation goals.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: NA Page #: 4 Line #: 23
Original Specific Comment #: 38
Comment: The text indicates that approximately 3.48 acres of the site will be covered with "herbaceous marsh" or wet prairie

2133

Commenting Organization: U.S. EPA
Section #: NA Page #: 7
Original Specific Comment #: 44

Commentor: Saric
Line #: 6

Comment: The text indicates that amphibians at the site will be inventoried using "appropriate means." The text should define "appropriate means."