



State of Ohio Environmental Protection Agency

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George V. Voinovich  
Governor

December 28, 1999

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

**Re: COMMENTS: A8P1 REVEGETATION TEST PLOTS 1999 ANNUAL REPORT**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's December 1, 1999 submittal "Area 8 Phase 1 Revegetation Test Plots Annual Report." Ohio EPA's comments on the document are attached.

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  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc  
Ruth Vandergrift, ODH

Ohio EPA Comments on A8P1 Revegetation Plots Annual Report

- 1) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #: General Comment      Pg #:                      Line #:                      Code: c  
Comment: Ohio EPA recommends that a number of the methods and scientific rigor utilized in the Invasive Species Control research project seedling assessment be employed in this research project over the coming year. The rigor and statistical analysis utilized in the Invasive Species Control project, would allow for more well supported conclusions from the Revegetation research project.
  
- 2) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:                      Pg #: 1                      Line #:                      Code: c  
Comment: No method reference is provided for the decision to measure at 1 meter. Diameter at breast height is a well established standard for assessing tree growth. Better justification including supporting literature should be provided for using this non-standard method. In order to provide useful data for future restoration work at Fernald the research should use standard measurements that will be employed for monitoring restoration progress. Additionally, the comparability of this measurement to literature values which commonly use DBH is in question.
  
- 3) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:                      Pg #:2                      Line #:                      Code: c  
Comment: The fact that the research results do not reflect actual field conditions (e.g., "It is likely that more trees will later succumb to transplant, drought and herbivore damage they faced this year.") suggest a different method of assessing trees is necessary. The data lead to the conclusion that survival was much higher than in reality it will be. The researcher should assess other methods for determining the health of the tree rather than dead or alive. A tree that has all the bark stripped off will certainly not survive and is only artificially inflating survival numbers. The assessment needs to somehow account for this.
  
- 4) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:                      Pg #: 3                      Line #:                      Code: c  
Comment: The document fails to provide sufficient justification for deviation from the original work plan procedure of applying repellants to the seedlings/saplings. Though browse appears to be light now, it is expected that the most substantial browse will occur during the winter and early spring. Additionally, the seedlings may become more visible under snow conditions that mat the grass down and leave seedlings standing.
  
- 5) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:                      Pg #: 4                      Line #:                      Code: c  
Comment: Though trampling damage is used as a basis for not planting *Celtis* seedlings, it is not discussed in the decision to plant *Quercus* seedlings in the spring. Ohio EPA agrees with the decisions to plant *Quercus* seedlings and not plant *Celtis* seedlings as it is consistent with the original design. However, a method to assess damage to surrounding seedlings caused by planting *Quercus* seedlings should be developed. One suggestion would be do seedling assessment prior to and immediately following planting,

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thus attributing any damage to planting activities.

- 6) Commenting Organization: Ohio EPA                      Commentor: OFFO  
Section #:                      Pg #: 4                      Line #:                      Code: c  
Comment: Though "changes in the herbaceous undergrowth" is mentioned, it is not expounded upon. If this is possibly useful information resulting from the research project it should be included in the report. Particularly if the "change" is being attributed to the treatments rather than the absence of grazing and local soil conditions.