



State of Ohio Environmental Protection Agency

Southwest District Office

401 East Fifth Street
Dayton, Ohio 45402-2911
(513) 285-6357
FAX (513) 285-6249

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George V. Voinovich
Governor

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August 3, 2000

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

RE: COMMENTS OSDF PHASE III CFC PACKAGES

Dear Mr. Reising:

This letter provides Ohio Environmental Protection Agency comments on the On-Site Disposal Facility Phase III Certified for Construction Packages. These packages were submitted under cover letters DOE-0695-00 and DOE-0789-00.

If you have any questions, please contact Tom Ontko or me.

Sincerely,

Tom Ontko
for

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

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Ohio EPA Comments on the On-Site Disposal Facility
Phase III Certified for Construction Packages

We have no comments on the following:

Construction Drawings
Borrow Area Management Plan
Impacted Materials Placement Plan
Construction Quality Control Plan
Calculations Package.

Comments on the Surface Water Management and Erosion Control Plan

- 1) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 1.5 Pg #: 1-4 Line #: NA Code: C
Comment: The Storm Water Pollution Prevention Plan (SWPPP) does not provide the basis for the NPDES permit, rather the SWPPP is part of the NPDES permit.

- 2) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 2.4 Pg #: 2-3 Line #: NA Code: C
Comment: Although mentioned in section 2.5, "Other Requirements", criteria in ODNR Rainwater and Land Development should be used to design surface water and erosion control structures.

- 3) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 4.6.1 Pg #: 4-6 Line #: NA Code: C
Comment: Rip rap should be installed only "...whenever use of matting and seeding is not practical and conditions are such that soil may erode under design flow conditions..."

- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 6.2.4 Pg #: 6-3 Line #: NA Code: C
Comment: Please add a bullet that silt fences no longer needed will be removed.

Comments on the Technical Specifications

- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Section 3.02(E) Pg #: Line #: Code: C
Original Comment #:
Comment: The section fails to provide any time frame on the decision to use permanent or temporary seeding. If a number of years are to pass before any disturbance would be required then permanent seeding may be more appropriate. Specific example

Ohio EPA Comments
OSDF Phase III Package
Page 2

would be in areas where extraction wells are installed and will require removal at some future date. Permanent seeding in these areas is most appropriate considering the duration between disturbance. Revise the spec to provide some time frame for deciding between permanent and temporary seeding.

- 6) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Section 3.02(F) Pg #: Line #: Code: C
Comment: Ohio EPA does not believe 2H:1V is an acceptable permanent slope. Slopes of this nature should be regraded to provide a more stable profile. Additionally, based upon previous attempts at seeding on the site, Ohio EPA recommends requiring the use of erosion mat on slopes of 4H:1V as well.
- 7) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Section 3.03(B) Pg #: Line #: Code: C
Comment: July 1 would seem to be too late to successfully conduct permanent seeding. Ohio EPA would recommend moving the end of the permanent seeding window back to June 1.
- 8) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Table 02930-1A Pg #: Line #: Code: C
Comment: Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.
- 9) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Table 02930-1B Pg #: Line #: Code: C
Comment: Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.
- 10) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Spec. 02930-6, Table 02930-2 Pg #: Line #: Code: C
Comment: Ohio EPA recommends the elimination of annual rye grass from the spec to reduce impact on any future restoration effort. Increasing the use of Canada Wild Rye (*Elymus canadensis*) is an appropriate replacement. Additionally, the spec should be revised to include Partridge Pea, (*Cassia fasciculata*). This legume is generally recommended for planting with ReGreen as seen in the STP planting. Please include scientific names of all species in the seed mix to prevent any confusion during ordering or QC checks.