



**Department of Energy**

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**3503**

08 FEB 2001

Mr. James A. Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V, SRF-5J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

DOE-0327-01

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East 5<sup>th</sup> Street  
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY  
COMMENTS AND THE FINAL IMPLEMENTATION PLAN FOR PADDY'S RUN DEBRIS  
REMOVAL/BANK STABILIZATION AND AREA 1, PHASE III**

- References:
- 1) Letter, T. Schneider to J. Reising, "Conditional Approval – Draft Implementation Plan for A1P3 Debris Removal," dated January 2, 2001
  - 2) Letter, J. Saric to J. Reising, "A1, P3 Implementation Plan," dated January 18, 2001

Enclosed for your approval are responses to the Ohio Environmental Protection Agency comments and the final Implementation Plan for Paddy's Run Debris Removal/Bank Stabilization and Area 1, Phase III.

Mr. James A. Saric  
Mr. Tom Schneider

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08 FEB 2001

If you have any questions or require additional information, please contact Robert Janke at (513) 648-3124.

Sincerely,



Johnny W. Reising  
Fernald Remedial Action  
Project Manager

FEMP:R.J. Janke

Enclosures

cc w/enclosures:

N. Hallein, EM-31/CLOV  
R. J. Janke, OH/FEMP  
G. Jablonowski, USEPA-V, SRF-5J  
T. Schneider, OEPA-Dayton (three copies of enclosures)  
F. Bell, ATSDR  
F. Hodge, Tetra-Tech  
M. Schupe, HSI GeoTrans  
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cc w/o enclosures:

A. Harris, OH/FEMP  
K. Nickel, OH/FEMP  
J. Reising, OH/FEMP  
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J. D. Chiou, Fluor Fernald, Inc./52-0  
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T. Hagen, Fluor Fernald, Inc./65-2  
S. Hinnefeld, Fluor Fernald, Inc./31  
M. Rolfes, Fluor Fernald, Inc./60  
D. Russell, Fluor Fernald, Inc./52-0  
T. Walsh, Fluor Fernald, Inc./46  
E. Woods, Fluor Fernald, Inc./65-2  
ECDC, Fluor Fernald, Inc./52-7

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**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS  
ON THE IMPLEMENTATION PLAN FOR PADDYS RUN DEBRIS REMOVAL/BANK  
STABILIZATION AND AREA 1, PHASE III  
(20720-PL-0001, REVISION A)**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT**

**SPECIFIC COMMENTS**

Commenting Organization: Ohio EPA  
Section #: 1.2 Pg. #: 1-4 Line #: 14-16 Commentator: OFFO  
Original Comment #: 1 Code: C

Comment: Certification of A1PIII Part One soils is not complete. Sampling in the area of debris excavation is forthcoming, and needs to be included in the certification document. As stated in the SEP, Section 3.4.7: "Upon *completion* of all certification activities within a remediation area, a formal certification report will be issued for the *entire* remediation area." A certification report submitted for review without complete certification results for the entire area is unacceptable and will not be reviewed.

Response: Agreed.

Action: Text in Section 1.2, Lines 14-16, will be revised to read "Sampling and analysis for certification of surface soils has been completed..." A formal certification report will be issued for the entire remediation area following debris removal and subsequent excavation footprint certification sampling.

Commenting Organization: Ohio EPA  
Section #: 1.3.2.1 Pg. #: 1-5 Line #: N/A Commentator: DSW  
Original Comment #: 2 Code: C

Comment: Although no cave salamanders were found during the survey for them, the terrain in the northeast fill area appears to be excellent habitat for the salamanders. Construction workers should be made aware of this and, if possible, a representative of the Natural Resources Group should be present when this area is excavated. You may recall that during the draining and filling of the old cistern in Area 1, Phase I (A1PI), a representative from Natural Resources was present to watch for cave salamanders. Any that were found could be relocated to suitable habitat.

Response: The most recent site survey for the cave salamander (1993) concluded that the only suitable habitat was the A1PI well, which has since been filled as stated in the comment. The rest of the site was considered poor habitat for cave salamanders. However, several other species of salamanders may be present in the vicinity of the northeast fill area.

Action: A Fluor Fernald Natural Resources representative will be available during debris removal in the northeast fill area. If necessary, Fluor Fernald Natural Resources personnel will attempt to capture and relocate any observed salamanders to suitable habitat.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: 1.3.3

Pg. #: 1-7

Line #: N/A

Code: C

Original Comment #: 3

Comment: Upon completion of the cultural resource survey, a map should be provided to the agencies depicting areas to be protected. This should be provided prior to start of the project.

Response: In accordance with the Programmatic Agreements (PA) among the U.S. Department of Energy (DOE), Fernald Area Office, the Advisory Council on Historic Preservation, and the Ohio Historic Preservation Office (OHPO) regarding archaeological investigations at the Fernald Environmental Management Project, the above-mentioned PAs provide the Cultural Resource Manager at the DOE's Fernald Site with the authority to allow projects at the facility to proceed when cultural resource investigations determine that a given site is not eligible for the National Register of Historic Places (NRHP). The comments and reports from DOE at Fernald to the OHPO and agencies are submitted in accordance with the provision of the National Historic Preservation Act of 1966, as amended [16 U.S.C. 470 (36 CFR 800)], and the Archaeological Resource Protection Act of 1979, as amended. Cultural Resource information is protected. Therefore, information on areas to be protected will be communicated to Construction through a walkdown/briefing prior to the start of the project. The agencies will be invited to attend this, or a separate, walkdown/briefing.

Action: A report of all cultural resource areas discovered will be provided to the OHPO at the conclusion of the Phase I investigation within Area 1, Phase III (A1PIII). A walkdown/briefing will be arranged with the agencies.

Commenting Organization: Ohio EPA

Commentator: DSW

Section #: 1.4

Pg. #: 1-8

Line #: 1-17

Code: C

Original Comment #: 4

Comment: Conspicuously absent from the list is assuring that downgradient storm water controls are in place prior to upgradient disturbance. Perhaps I am biased, but I hope this is considered by the soils and OU5 groups to be an important lesson learned.

Response: Agree with your assessment of assuring that downgradient storm water control be in place prior to upgradient disturbance.

Action: Placement of downgradient storm water controls prior to upgradient disturbance will be added to the list of lessons learned presented in Section 1.4. In addition, note 5 on Figure 2-2 will be revised to stress this requirement.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: Figure 1-3

Pg. #:

Line #: N/A

Code: C

Original Comment #: 5

Comment: Seeding should be completed compliant with the most recent version of the permanent seed mix and include both wet and dry mixes as determined by a representative from the Fluor Fernald Natural Resources Group.

Response: The most recent permanent seed mixes presented in the OSDF Phase III design package will be broadcast to re-vegetate disturbed areas.

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Action: Application of the appropriate seed mix based on moisture regime will be determined by Fluor Fernald Natural Resources personnel.

Commenting Organization: Ohio EPA  
 Section #: Figure 1-3 Pg. #: Line #: N/A Commentator: OFFO  
 Original Comment #: 6 Code: C

Comment: The figure lacks detail regarding the method and availability of stream access within A8PII without negatively impacting the restoration project completed in this area. Prior to start of work, a detailed access map should be created and appropriately flagged to ensure no damage to existing restored areas. Additionally, any access that must be graded into Paddys Run should be appropriately stabilized and restored with seeding, matting and dormant stakes.

Response: A walkdown involving members of Construction and Natural Resources has been conducted to designate a stream access within Area 8, Phase II (A8PII) that will not negatively impact the restoration project completed in the area. This path will be shown on a figure to be added to the Implementation Plan for Paddys Run Debris Removal/Bank Stabilization and A1PIII. Stream access just north of the Paddys Run debris removal area shown on existing figures requires no grading. Construction will enter/exit the stream, using a rubber tired Caterpillar 416, 426, 436 or equivalent to remove surface debris from the stream and bank toe. These backhoes have been chosen because of their relatively small size (22'6" L by 7'4"W by 11'9"H). The backhoe will place debris at a location along the eastern bank of Paddys Run that is easily accessible to equipment working in the A1PIII Part One southwest fill area for load-out and hauling to the east.

Action: Prepare a new figure for the Implementation Plan for Paddys Run Debris Removal/Bank Stabilization and A1PIII to illustrate in greater detail the approved access to Paddys Run stream. Add language to Sections 3.1 and 3.3.2 to address equipment selection and usage to minimize impact to A8PII and Paddys Run.

Commenting Organization: Ohio EPA  
 Section #: Figure 1-3 Pg. #: Line #: N/A Commentator: OFFO  
 Original Comment #: 7 Code: C

Comment: All efforts must be made to limit the impacts of heavy equipment on the State Threatened Sloan's crayfish. In-stream work must be planned to minimize the amount of movement by the equipment. To the extent possible, debris should be collected from above the bank. Where not possible, planning should be made such that the maximum debris removal can occur with a minimum of in-stream equipment movement. Ohio EPA requests sufficient prior notice for in-stream work such that we may have a representative present.

Due to the potential impacts to the Sloan's crayfish population, the population monitoring under the IEMP should be completed during 2001 rather than waiting until 2002.

Response: The use of heavy equipment within the Paddys Run streambed will be minimized. Construction personnel plan to limit in-stream equipment by moving concrete debris from the streambed to the eastern stream bank toe to the location where loose and embedded concrete debris also exists, with the rubber tired Caterpillar 416, 426, 436, or equivalent as discussed above. From there, a tracked Caterpillar 325 or equal excavator on top of the east stream bank will be able to remove all the debris from above with an

extended bucket. In the place of the excavated debris at the eastern stream bank toe, a combination of riprap and natural streambed stone from the western stream bank will be installed as discussed during the field walkdown with OEPA representatives on January 11, 2001. Riprap will either be delivered through Area 8 via the route shown in Figure 3-1 or through A1PIII via the designated debris haul route. Additionally, sand, gravel, and silt from the western stream bank will be placed within the gaps of the larger stone to provide a suitable media for the installation of willow cuttings prior to the demobilization of equipment and construction personnel from A1PIII. Extensive resloping of the vertical face of the eastern stream bank will not be necessary since no debris is evident. Debris from the top of the eastern stream bank will be removed and the area reseeded and coir matting will be installed, as necessary. Riprap will be installed downstream near the eastern stream bank railroad trestle for additional erosion protection. A representative from Fluor Fernald Natural Resources will be available to assist the Construction Manager with coir matting and willow cutting installation. Deviations from the above planning will be brought to the attention of OEPA and input will be requested for contingency planning should any unforeseen problem arise.

Finally, the Integrated Environmental Monitoring Plan (IEMP) survey for the Sloan's crayfish will be accelerated to 2001 to assess any impacts to the existing population that may be the result from this activity:

Action: The Implementation Plan will be revised to reflect the discussion and planning above to minimize impacts to Paddys Run and conduct a site survey for the Sloan's crayfish in Summer 2001. DOE will provide sufficient prior notification for in-stream work so OEPA representatives can be present.

Commenting Organization: Ohio EPA  
Section #: Figure 1-3 Pg. #: Line #: N/A Commentator: OFFO  
Original Comment #: 8 Code: C

Comment: The bank stabilization discussed in the document is insufficient. A plan, including contingencies, for stabilizing the bank should be developed as an addendum to this document. The bank will likely require slope grading and stabilization along with toe stabilization and revegetation following completion of the project and prior to spring flooding. Obviously, stabilization of this bank is important to protecting the Sloan's crayfish habitat as well as maintaining stream flow to protect the railroad trestle.

Response: See response to Comment No. 7.

Action: See action to Comment No. 7.

Commenting Organization: Ohio EPA  
Section #: Figure 1-3 Pg. #: Line #: N/A Commentator: OFFO  
Original Comment #: 9 Code: C

Comment: Any alterations to vehicle traffic flow from the original plan must be concurred with by a representative from the Fluor Fernald Natural Resources Group to ensure protection of jurisdictional wetlands in the area.

Response: Agreed.

Action: Keyed note 1 of Figure 1-3 will be revised to add "...in consultation with Natural Resources."

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Commenting Organization: Ohio EPA  
Section #: Figure 1-3 Pg. #: Line #: N/A Commentator: OFFO  
Original Comment #: 10 Code: C

Comment: All tree removal and alterations to vehicle flow patterns must be concurred with by a representative from the Fluor Fernald Natural Resources Group to ensure protection of important natural resources.

Response: Agreed. As stated in Note 6 of Figure 2-2, trees to be protected have been marked in the field by Natural Resources.

Action: None.

Commenting Organization: Ohio EPA  
Section #: 3.3.1 Pg. #: 3-2 Line #: 34-35 Commentator: OFFO  
Original Comment #: 11 Code: C

Comment: Excavation in the areas of debris must continue until native soil has been reached, as determined by a field geologist.

Response: Agreed. Excavation of the southwest fill area to native soil is required to ensure that debris has been removed. The one exception to this is Excavation Location 5, at the top of Paddys Run east bank. Upon removal of surface debris from within this excavation location, a 6-inch scraping will be performed to ensure removal of all debris. If construction personnel have difficulty in identifying where fill ends and native soil begins, a field geologist will assist in the determination.

Action: The third sentence of Section 3.3.1 will be revised to read "...excavating the soil to a depth of 4 feet and sifting through the soil to segregate debris. A field geologist will be made available to assist construction personnel in determining where fill ends and native soil begins."

Commenting Organization: Ohio EPA  
Section #: 3.5 Pg. #: 3-4, 3-5 Line #: 33-34, 1-2 Commentator: DSW  
Original Comment #: 12 Code: C

Comment: See Comment No. 1.

Response: See Response to Comment No. 1.

Action: See Action to Comment No. 1.

Commenting Organization: Ohio EPA  
Section #: 4.1 Pg. #: 4-1 Line #: N/A Commentator: OFFO  
Original Comment #: 13 Code: C

Comment: See comment regarding cave salamanders above.

Response: See Response to Comment No. 2.

Action: See Action to Comment No. 2.