



Department of Energy

**Ohio Field Office
Fernald Area Office**
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26 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-0325-01

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

Mr. Bill Kurey
U.S. Fish and Wildlife Service, Suite H
6950 American Parkway
Reynoldsburg, Ohio 43068

Dear Mr. Saric, Mr. Schneider, and Mr. Kurey:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT OUTLINE FOR THE FERNALD ENVIRONMENTAL
MANAGEMENT PROJECT PRESCRIBED BURN PLAN**

Reference: Letter, T. Schneider to J. Reising, "Draft Outline for Prescribed Burn Plan,"
dated November 21, 2000

Enclosed are responses to the Ohio Environmental Protection Agency comments on the draft Outline for the Fernald Environmental Management Project (FEMP) Prescribed Burn Plan. The U.S. Department of Energy (DOE) agrees that prescribed burning will probably be needed to successfully establish prairie grasses and forbs in Area 8, Phase II.

26 FEB 2001

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Mr. Tom Schneider
Mr. Bill Kurey

-2-

However, DOE-Headquarters issued a complex-wide moratorium on prescribed burning in May 2000. Prescribed burning at the FEMP is not permitted until DOE issues a complex-wide policy on prescribed burns, or unless DOE-FEMP secures a waiver for the moratorium. If you have any questions or require further information, please contact Pete Yerace at (513) 648-3161.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Yerace

Enclosures

2

Mr. James A. Saric
Mr. Tom Schneider
Mr. Bill Kurey

-3-

26 FEB 2001

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
R. Vandegrift, ODH
AR Coordinator, Fluor Fernald, Inc./78

3521

cc w/o enclosures:

K. Nickel, OH/FEMP
W. Pasko, OH/FEMP
D. Pfister, OH/FEMP
J. Reising, OH/FEMP
E. Skintik, OH/FEMP
A. Tanner, OH/FEMP
D. Carr, Fluor Fernald, Inc./2
D. Cherry, Fluor Fernald, Inc./52-2
J. D. Chiou, Fluor Fernald, Inc./52-0
G. Evans, Fluor Fernald, Inc./28
M. Frank, Fluor Fernald, Inc./90
T. Hagen, Fluor Fernald, Inc./65-2
J. Homer, Fluor Fernald, Inc./65-2
S. Hinnefeld, Fluor Fernald, Inc./31
M. Jewett, Fluor Fernald, Inc./52-2
U. Kumthekar, Fluor Fernald, Inc./64
T. Patton, Fluor Fernald, Inc./76
W. Prues, Fluor Fernald, Inc./28
T. Walsh, Fluor Fernald, Inc./65-2
S. Wentzel, Fluor Fernald, Inc./52-2
E. Woods, Fluor Fernald, Inc./65-2
ECDC, Fluor Fernald, Inc./52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT OUTLINE FOR PRESCRIBED BURN PLAN**

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 1 Code: C

Comment: Ohio EPA does not concur with the proposed deadline of 30 days after DOE issues a final policy on prescribed burns for submittal of the document. DOE should submit a draft sitewide fire management plan and a draft A8PII savanna project burn plan to the NRTs before March 1, 2000. It is likely that a prescribed burn will be necessary to allow successful establishment of native grasses and forbs in the dense non-native pasture grasses within the A8PII savanna.

Response: DOE agrees that prescribed burning will probably be needed to successfully establish prairie grasses and forbs in A8PII. However, DOE-Headquarters issued a complex-wide moratorium on prescribed burning in May 2000. An implementation plan for developing a DOE-wide policy on prescribed burns is expected this spring. Until the new policy is issued, DOE-FEMP is not permitted to conduct prescribed burns on site. In the meantime, DOE-FEMP will maintain the A8PII savanna through mowing. It is expected that the new policy will be in place by 2002, when a prescribed burn is planned for A8PII. If the policy is not in place, DOE-FEMP will seek a waiver from the prescribed burn moratorium.

Action: Maintain the A8PII savanna through mowing as needed and plan to conduct a prescribed burn in 2002.

Commenting Organization: Ohio EPA
Section #: General Comment Pg. #: Line #: Commentator: OFFO
Original Comment #: 2 Code: C

Comment: Some information included in the project specific burn plan outline that is not in the fire management plan should be included, especially those highlighted in red. See below:

**APPENDIX A
PROJECT-SPECIFIC BURN PLAN OUTLINE**

1. Objective
2. Site information
 - a. Description of burn site
 - i. Topography
 - ii. Description of fuels
 - b. Map of project area with burn site indicated
3. Schedule information
 - a. Burn window
 - b. Anticipated start time
4. Weather factors
 - a. Wind speed limitations
 - b. Wind direction limitations
 - c. Temperature limitations (minimum and maximum)
 - d. Relative humidity limitations (minimum and maximum)

5. Pre-burn site preparation
6. Burn strategy
 - a. Ignition techniques
 - b. Burning techniques
 - c. Flame height limitations
 - d. Rate of spread limitations
 - e. Patrol
 - f. Mop-up
7. Equipment requirements
8. Communications requirements
 - a. Pre-burn contact list
 - b. Post-burn contact list
9. Contingency plans
 - a. Emergency contact
 - b. Termination strategy

Additionally there should be a section describing the reasons for grassland burning (Section I?), specific information about permits required (Section II?), equipment required (Section V?), specifics about safety and training of the fire crew (Section VII ?), cleanup (Section VIII?) and evaluation (see example form at <http://www.nowrc.usgs.gov/resource/tools/burning/appendd.htm>) (Section XI?). I would like to be sure be includes Higgins *et al* (1989) as a reference (see <http://www.npwrc.usgs.gov/resource/tools/burning/burning.htm>).

It is difficult to evaluate without seeing what exactly will be in the sections of the outline and additional changes may be recommended once the entire plan is available for review but this is my initial opinion.

Response: Project-specific burn plans will include all of the components listed above. Additional information may be required to comply with the forthcoming DOE policy on prescribed burns.

Action: Develop project-specific burn plans as needed for prescribed burns at the FEMP. Ensure that project-specific burn plans meet the requirements of the forthcoming DOE policy on prescribed burns.