



State of Ohio Environmental Protection Agency

3909

Southwest District Office

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October 15, 2001

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

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RE: COMMENTS R1C WETLAND CROSS-WALK FOR EXTRACTION SYSTEMS

Dear Mr. Reising:

Ohio EPA has reviewed DOE's September 25, 2001 submittal, "Response to Ohio EPA's Conditional Approval of Wetland Permitting CrossWalk for the Waste Storage Area Extraction System and South Field Extraction System Supplemental Well Project." Based upon this review, Ohio EPA provides the following comment:

1) Commenting Organization: OEPA Commentor: OFFO
Section #: Pg. #: Line #: Code: C
Original Comment #:

Comment: Ohio EPA believes the revegetation work proposed and implemented by DOE along the the Pilot Plant Drainage Ditch is appropriate for similar wetland disturbances on-site. Efforts must be made to quickly re-establish native vegetation consistent with that existing prior to disturbance. At a minimum, when disturbances occur along stream channels DOE should stabilize the channel banks using erosion control matting (coir or jute), install native grass/forb seed prior to matting, and install appropriate live plant material dependent upon the time of year and location. In most instances, dependent upon timing, live plant material could include dormant willow, dogwood, sycamore or similar cuttings. In other cases, plugging of nursery grown stock may be more appropriate. This is the approach that has been utilized in all recent disturbance events (A1P3, SWU, Ra Hotspot) and should be continued.

In this particular case, DOE should install native seed, install matting and install dormant cuttings along the area of disturbance. Sources of cuttings are available in the immediate area and should be utilized upon the on-set of dormancy. A significant amount of woody cover was removed from the stream bank during this project creating the potential for preferential erosion. Timely stabilization and revegetation will prevent further exacerbation of current impacts.

Mr. Johnny Reising
October 15, 2001
Page 2

3909

Should 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, Fluor Fernald
Mark Shupe, GeoTrans, Inc.
Francie Hodge, Tetra Tech EM Inc.
Ruth Vandergrift, ODH

DOE-FEMP & DOE-OH ON-SITE EMPLOYEES

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