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State of Ohio Environmental Protection Agency

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November 20, 2002

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

FERNALD
LOG D-0234
2002 NOV 25 A 11:29
FILE

Re: DISAPPROVAL - Northern Pines Plantation NRRDP

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 15, 2002 submittal of the "Northern Pine Plantation Natural Resource Restoration Design Plan." Based upon our review, Ohio EPA has the attached comments on this document.

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
Mary Cullerton, Tetra Tech Inc.
Ruth Vandergrift, ODH
Mark Navarre, OEPA Legal

- 1) Commenting Organization: Ohio EPA Commentor: OFFO
 Section #: General Comment Pg #: Line #: Code: C
 Original Comment #:
 Comment: The document has not been revised to incorporate changes discussed in the September 19, 2002 nor the October 30, 2002 Natural Resource Trustee meetings. The document should be revised to address the issues presented in those meetings and resubmitted for review.
- 2) Commenting Organization: Ohio EPA Commentor: DSW/OFFO
 Section #: 2.3 Pg #: 2-3 Line #: 9-10 Code: C
 Original Comment #:
 Comment: This section states that:
 "Corridors of prairie grass would be planted at locations where deer movement has been observed historically or is anticipated to occur in the future."
 However, discussions have indicated the desire by DOE to plant non-native vegetation in these corridors. We are not in favor of the use of alien species in these corridors. Additionally, Executive Order 13112 states in part that:
 Section 2. Federal Agency Duties
 (a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent
 practicable and permitted by law,
 (3) not authorize,
 fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of
 invasive species in the United States or elsewhere unless, pursuant to guidelines that it has pre-scribed,
 the agency has determined and made public its determination that the benefits of such actions clearly
 outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to
 minimize risk of harm will be taken in conjunction with the actions.
- We therefore believe it is in DOE's best interest to plant these corridors as indicated in this section, that is, with native vegetation. Alternatively, Ohio EPA provided a proposed mix of native forbs/grasses that we believe would achieve DOE's goal of deer feeding and still maintain the ecological integrity of the project. This proposed mix was provided to DOE in early October.
- 3) Commenting Organization: Ohio EPA Commentor: DSW/OFFO
 Section #: 2.3.2 Pg #: 2-3 Line #: 26-34 Code: C
 Original Comment #:
 Comment: This section and appendix A (Specification 02930) describe the use of coir matting. However Figure 1-3 specifies in the notes a product C-350 which is matting containing plastic netting. Obviously the document contradicts itself and standard procedure for site activities. Additionally, no engineering basis is presented to support the need for such drastic erosion protection on basins which should be designed as vernal pools.

We believe the use of plastic netting in erosion control matting to be unacceptable. There are many suitable materials for any design flows expected that have all natural materials. Reference the studies made by Texas DOT and comparisons have already been made. We believe the current specifications in the existing document should be followed (section 2.3.2 and Specification 02930). Plastic reinforced matting has not been used on the site for a number of years do to inherent problems with the material. This is for construction projects as well as restoration projects. No other on-site restoration project has employed such matting. The last construction project to use similar material clearly demonstrates the problems with the material. Simply inspecting the western side of the outfall stream from the borrow area sed basin shows long strands of plastic covering the banks where the fabric has decomposed and all that remains is plastic.

- 4) Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.2 Pg #: 3-1 Line #: 24-26 Code: C
Original Comment #:
Comment: This section states that:
The vernal pool features consist of a shallow depression approximately 50 feet in diameter and approximately 3 feet deep....The vernal pools will be constructed with at least 3:1 side slopes to ensure the safety of anyone in the area.
From the observation of such excavations, we believe the pools should be made more shallow (1-1.5 feet) with a much more shallow slope to the side slopes (5:1 to 10:1).
- 5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: 5.0 Pg #: 5-1 Line #: Code: C
Original Comment #:
Comment: This section is inconsistent with previous NRRDPs with regard to monitoring and previous agreements regarding monitoring. Additionally, it does not incorporate changes discussed in recent NRT meetings. The section should be revised to be consistent with prior NRRDPs and recent NRT meetings.