

Southwest District Office

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Bob Taft, Governor  
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January 6, 2003

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

Handwritten notes: FERNALD, 100, 64419.356, 2003 JAN 6 AM 10:11, D-0414

Re: **Comments - Borrow Area RtC and Grading Plan**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's December 19, 2002 submittal of the "Transmittal of Responses to the Ohio EPA and USFWS Comments on the Grading Plan for the Accelerated Restoration of the On-Site Disposal Facility." 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
- Bill Kurey, USFWS

### Ohio EPA Comments on Borrow Area Accelerated Grading Plan

- 1) Commenting Organization: Ohio EPA                      Commentor: DSW/OFFO  
Section #:    Pg #: Line #:                      Code: C  
Original Comment #: #1  
Comment: In follow up to Ohio EPA's previous comments, based upon drawing 90X-55000-G-00619 subarea 2 should drain to elevation 569.79 as that is the drain elevation as shown. With the drain elevation shown on the drawing a large portion of subarea 2 will be dry, <1' of water or intermittently wet. Given DOE's recent emphasis on maintenance prevention this area must receive more pro-active restoration. Topsoil application, seeding and plugging are important to prevent subarea 2 from becoming a monoculture of typha that requires constant maintenance. Ohio EPA believes these measures are necessary to ensure success of the borrow area restoration.
  
- 2) Commenting Organization: Ohio EPA                      Commentor: DSW/OFFO  
Section #:    Pg #: Line #:                      Code: C  
Original Comment #: #3  
Comment: Ohio EPA believes it is unlikely that crusting agent will successfully prevent erosion of these piles into the newly restored area. In order to provide proper protection of the restored area silt fence should be installed along the toe of all piles draining into the restored area.
  
- 3) Commenting Organization: Ohio EPA                      Commentor: DSW/OFFO  
Section #: General Comment    Pg #: Line #:                      Code: C  
Original Comment #:  
Comment: Ohio EPA had sent this as a comment with the previous submittal but it came later so probably got lost. Trees were removed in whole from the borrow area as part of the site prep. These trees should be placed into the restored portions of the borrow pit to provide additional habitat. Woody debris is an important component to wetland habitats.