



Department of Energy
Ohio Field Office
Fernald Environmental Management Project
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APR 21 2003

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

DOE-0332-03

Dear Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE OHIO ENVIRONMENTAL PROTECTION AGENCY
 COMMENTS ON THE GRADING PLAN FOR ACCELERATED RESTORATION OF THE
 ON-SITE DISPOSAL FACILITY BORROW AREA**

- References:
1. Letter, J. Reising to J. Saric, T. Schneider, B. Kurey, "Transmittal of Responses to the Ohio Environmental Agency and United States Fish and Wildlife Agency Comments and the Grading Plan for Accelerated Restoration of the On-Site Disposal Facility Borrow Area," dated December 19, 2002
 2. Letter, T. Schneider to J. Reising, "Comments - Borrow Area RTC and Grading Plan," dated January 6, 2003

Enclosed for your approval are responses to the Ohio Environmental Protection Agency (OEPA) comments on the Accelerated Grading Plan for Subareas 1 and 2 of the On-Site Disposal Facility Borrow Area. Grading and seeding activities are being carried out as weather permits and are expected to be complete later this Spring.

If you have any questions or need further information, please Pete Yerace at (513) 648-3161.

Sincerely,

Johnny W. Reising
 Fernald Remedial Action
 Project Manager

FCP:Yerace

Enclosure: As Stated

APR 21 2003

Mr. Tom Schneider

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DOE-0332-03

cc w/enclosure:

R. Janke, OH/FCP
D. Pfister, OH/FCP
G. Stegner, OH/FCP
P. Yerace, OH/FCP
J. Saric, USEPA
T. Schneider, OEPA-Dayton (three copies of enclosure)
G. Jablonowski, USEPA-V, SRF-5J
B. Kurey, DOI-USFWS
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
AR Coordinator, MS78

cc w/o enclosure:

R. Greenberg, EM-31/CLOV
N. Hallein, EM-31/CLOV
J. Reising, OH/FCP
E. Skintik, OH/FCP
D. Carr, Fluor Fernald, Inc./MS1
J. Chiou, Fluor Fernald, Inc./MS64
J. Foster, Fluor Fernald, Inc./MS76
T. Hagen, Fluor Fernald, Inc./MS1
J. Homer, Fluor Fernald, Inc./MS65-2
L. Ludwick, Fluor Fernald, Inc./MS65-2
R. Nichols, Fluor Fernald, Inc./MS1
T. Poff, Fluor Fernald, Inc./MS65-2
J. Schomaker, Fluor Fernald, Inc./MS65-2
H. Swiger, Fluor Fernald, Inc./MS65-2
S. Walpole, Fluor Fernald, Inc./MS76
E. Woods, Fluor Fernald, Inc./MS65-2
ECDC, Fluor Fernald, Inc./MS52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON BORROW AREA ACCELERATED GRADING PLAN (20104)**

FERNALD CLOSURE PROJECT

GENERAL COMMENTS

Commenting Organization: Ohio EPA
Section #: Pg. #: Line #: Commentator: DSW/OFFO
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 applications, 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.

Response: It is anticipated that the portion of Subarea 2 below elevation 571 will be covered with at least a foot of water on a permanent basis. The area has remained inundated since late Summer 2002 except when pumping was initiated to dry the area out for grading. Some topsoil has been added in the area immediately adjacent to the 571 contour where elevation may be less than one foot. This area will also be seeded in Spring 2003. Because the area will be covered with water, there are no plans to cover the entire area with topsoil or to seed the area. This is consistent with other restoration areas where permanent inundation is expected.

Action: The area will be observed over Summer 2003. If drying does occur in unseeded areas, those areas will be seeded per the seeding specification.

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

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.

Response: Silt fence was not shown on the drawings since the stockpile areas are not within the scope of work for the restoration plan. The installation of silt fencing will be carried out as part of Borrow Area activities to minimize the impacts of the soil piles on the restored portions of the Borrow Area.

Action: Ensure that silt fence installation between the soil stockpiles and the eastern edge of restoration area is complete prior to beginning restoration seeding or planting.

Commenting Organization: Ohio EPA

Commentator: OFFO

Section #: General Comment Pg. #: NA

Line #: NA

Code:

Original Comment #: 3

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.

Response: A portion of the trees still remains in the Borrow Area. The debris remaining will be delivered to the Borrow Area for inclusion as habitat on the edge of ponds, waterways or meadows.

Action: Wood debris on the east edge of the Borrow Area stockpile laydown will be moved to the eastern edge of the Borrow Area. Debris will be dispersed around the Borrow Area once grading has been completed.