



State of Ohio Environmental Protection Agency
Southwest District

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June 18, 2003

Mr. Johnny Reising
U.S. DOE FEMP
P.O. Box 398705
Cincinnati, OH 45329-8705

RE: DISAPPROVAL - RTC and Final NPP NRRDP

Dear Mr. Reising:

Ohio EPA has reviewed DOE's April 1, 2003 submittal "Transmittal of Response to Comments and the Final Northern Pines Plantation Natural Resources Restoration Design Plan." This letter documents our disapproval of the plan. Ohio EPA has stated on numerous occasions our disagreement with the seeding of non-native and potentially invasive plants without sufficient scientific justification. We have requested several times over the past two years, documentation supporting the use of these plants and at no time has DOE provided such technical documentation. Additionally, we believe the DOE's use of this seed is inconsistent with Executive Order 13112 and thus can not condone its usage. Obviously, deer damage is a significant factor at Fernald but based upon observations in A1P1 it is unlikely that the planting of clover will in anyway reduce deer damage. Without substantial technical documentation Ohio EPA will not approve the use of the proposed roadway seed mix. DOE should implement "more intensive deer control in the project area" as suggested in the NRRDP. Finally, as with previous versions of the document, DOE has failed to revise the document consistent with the response to comments thus the response to comments say one thing and the document requires another.

The on-going issues with this NRRDP highlight problems the actual restoration field work is facing in developing approvable design documents prior to actual field implementation. Technical issues such as the roadway seeding and the use of an erosion mat that is inconsistent with the technical specifications package should be resolved prior to starting field work not after installation.

If there are any questions, please contact me at (937) 285-6466.

Sincerely,

Thomas A. Schneider
Fernald Project Manager
Office of Federal Facilities Oversight

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