



State of Ohio Environmental Protection Agency

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October 27, 2003

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

Re: **DISAPPROVAL - AREA 8, PHASE III NATURAL RESOURCE DESIGN PLAN**

Dear Mr. Griffiths

Ohio EPA has reviewed DOE's submittal of the "Area 8, Phase III Natural Resource Restoration Design Plan Rev B DRAFT" (21110-PL-0001), received on . Enclosed are Ohio EPA's comments.

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
- Michelle Cullerton, Tetra Tech EM Inc.
- Ruth Vandergrift, ODH
- Bill Kurey, USFWS



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document. Obviously successful implementation of the Summer 2003 activities is paramount to the future success of the project as a whole. Additional detail on herbicide success and tile location/destruction success should be added.

8) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: Section 2.0                      Pg #: 2-1      Line #: 10-13 Code: C  
 Comment: This sampling should have been completed prior to development of this NRRDP. The document should be revised to include sampling data and resultant soil amendment needs.

9) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.1                      Pg #: 3-1      Line #: 11-27 Code: C  
 Comment: This area should be planted as prairie with a minimum 100 foot riparian buffer along Paddys Run (similar to the north prairie). With the difficulty experienced with tree survival, the grassland makes most sense, with enhancing the riparian area with suitable forest.

10) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: 3.1                      Pg #: 3-1      Line #: 24-27 Code: C  
 Comment: The plan needs to include a description of how the staging will be restored following completion of the project. Its proximity to Willey Road adds emphasis to the need to restore the staging area.

11) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.3                      Pg #: 3-2      Line #: 7-21 Code: C  
 Comment: See comment regarding prairie planting with 100 foot riparian buffer above.

12) Commenting Organization: Ohio EPA                      Commentor: OFFO  
 Section #: Table 3-3                      Pg #: n/a      Line #: n/a      Code: C  
 Original Comment #:  
 Comment: Yellow coneflower tends to prefer dry areas. Please check the CoW for this plant and reconsider its inclusion in the wetland seed mix. Boneset should be added to the wetland seed mix as it has been very successful in other on-site wetland projects.

13) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: 3.5                      Pg #: 3-2      Line #: 27-31 Code: C  
 Comment: See comment regarding prairie planting with 100 foot riparian buffer above.

14) Commenting Organization: Ohio EPA                      Commentor: DSW  
 Section #: Table 3-4                      Pg #: n/a      Line #: n/a      Code: C  
 Original Comment #:

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Comment: Remove Timothy from the interim seed mix, this plant is listed as an invasive and exotic species of North America.

15) Commenting Organization: Ohio EPA Commentor: DSW  
 Section #: 3.1 Pg #: 3-1 Line #: 11-27 Code: C

Comment: This area should be planted as prairie with a minimum 100 foot riparian buffer along Paddys Run (similar to the north prairie). With the difficulty experienced with tree survival, the grassland makes most sense, with enhancing the riparian area with suitable forest.

16) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: Section 4.3 Pg #: 4-2 Line #: n/a Code: C

Original Comment #:

Comment: Permanent seed mix should be used in all planted areas. Use of the interim seed mix does not provide sufficient ecological value. Additionally, the success of permanent vegetation in planted areas on prior projects has been taken into account when considering tree replacement requirements. Permanent seed mix is needed across the entirety of the project.

17) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 4.4.1 Pg #: n/a Line #: n/a Code: C

Original Comment #:

Comment: The watering proposed in this section is inadequate and inconsistent with the attached specification for planting. Revise the section to be more specific and require watering. Watering is essential to survival of woody plants.

18) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 4.4.2 Pg #: 4-3 Line #: Code: C

Original Comment #:

Comment: It is highly unlikely the deer control measures presented here will adequately protect plants. The lack of success of these measures has been demonstrated on numerous projects to date. The only truly effective control to date has been exclusion. Considering this, DOE should revise the plan to utilize fencing similar to that used in the SWU and NPP restorations along with clumped planting of shrubs.

19) Commenting Organization: Ohio EPA Commentor: OFFO  
 Section #: 5.0 Pg #: 5-1 Line #: 3-4 Code: C

Comment: The proposed monitoring is very inadequate and inconsistent with prior projects and Trustee agreements. The exclusion of implementation monitoring based upon an arbitrary closure date selected by DOE is unacceptable. Implementation monitoring should occur for three years at a minimum following completion of the project. Other compliance

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aspects of implementation will also need to be verified, such as planting in locations as specified in the plan, improvements and habitat additions such as may be specified in the plan, etc. Additional Ohio EPA comments on Implementation monitoring will be provided on the 2002 Consolidated Monitoring Report.