



State of Ohio Environmental Protection Agency

Southwest District

OG F-00475

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937)285-6357 - FAX: (937)285-8249
www.epa.state.oh.us

Bob Taft, Governor
Bruce Johnson, Lt. Governor
Joseph P. Koncelik, Director

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March 10, 2005

William Taylor
U.S. Department of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45248

RE: DISAPPROVAL - RTCs FORMER PRODUCTION AREA NRRDP REV 0 FINAL

Mr. Taylor:

Ohio EPA has reviewed DOE's January 31, 2005 submittal, "Transmittal Of: Responses To Ohio EPA Comments On The Former Production Area Natural Resource Restoration Design Plan Rev 0, Final (20810 & 20800-PL-0005). Ohio EPA disapproves of the document.

If there are 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
- Ken Alkema, Fluor Fernald
- Michelle Cullerton, Tetratich
- Mark Schupe, HSI Geotrans
- Bill Kurey, USFWS
- Tim Kern, Ohio AGO

**RTC'S ON THE FPANRRDP
REV 0, FINAL**

Comments:

1. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.4 Pg. #: 3-3 Line #: NA Code: C
Original Comment #: 7, 13, 17

Comment: Although the extent of erosion that occurs in the some of the spillways of the A1PI Wetland and the SWU have not been seen in the NPP, it may not be because of the type of matting used but rather the soil and flow characteristics. There are many spillways that do not exhibit erosion that does not have C350 or its equivalent. The radium hot spot wetlands have been built for quite some time, yet neither of the wetland's spillways has eroded. The A2PII wetland across from the As hot spot also has not eroded. There has been no erosion in the A8PII wetlands. None of these areas have erosion protection equivalent to C350. Basin 3 in the SWU spill over to the SSOD and has never had any erosion control protection installed in the area in which this occurs, and still there is not the erosion you refer to in order to justify the use of C350. It is likely that if C350 were installed in the eroded spillways to which you refer, they would continue to erode. Therefore it is presumptuous to state that the C350 has prevented the type of erosion found under coir or jute. With a properly designed and vegetated spillway, C350 should not be required.

2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 3.4 Pg. #: 3-3 Line #: NA Code: C
Original Comment #: 8, 10

Comment: Because something has been done throughout the site and is consistent with the requirements of a specification does not mean that it is the best path nor that it even is a successful path. Change is allowed, and even encouraged under the adaptive management concept. In the case of seeding with native grasses in areas that have had topsoil removed, the site has not had success. The failure is aggravated by more xeric conditions. As an example, one can look at the average cover classes from the SWU. No area has achieved an average cover class of 5 (>74% cover). The more xeric the area, the lower the cover class (1.9, or <2% cover for xeric areas). The addition of organic matter to soil and the protection of the soil with matting or mulch seem critical to increased native herbaceous cover. The production area is wide and open and consequently will be exposed to extreme conditions, particularly drying winds. The area should be mulched or matted regardless of what seeding method, regardless of what the specification states, and because of what we have seen on other areas of the site.

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3. Commenting Organization: Ohio EPA

Commentor: DSW

Section #: 5.0

Pg. #: 5-1

Line #: NA

Code: C

Original Comment #: 21

Comment: As stated in the draft NRRP "Implementation Monitoring will be two to five years in duration and will require data collection each year. Implementation Monitoring will help evaluate whether plant material installed are meeting minimum survival requirements and seeding is providing adequate cover as specified in the NRRDP." Likewise "Habitat Monitoring will have a longer duration (2003 to 2011) and a lower frequency of data collection (e.g., every three years)." The revised section 5.0 still does not adequately address monitoring for the completed FPA (e.g., Mortality counts are to be done in the same year as the planting rather than two years after planting (i.e., 2006 and 2007 for 3B and 3A/4A)).