

Taylor



State of Ohio Environmental Protection Agency

FERNALD _____

LOG 6-00018

Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6404
www.epa.state.oh.us

2005 OCT 26 A 3:10

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

FILE: 6446.2

SEARCHED _____

October 25, 2005

Mr. Johnny Reising
US Dept of Energy
Ohio Field Office
Fernald Closure Project
175 Tri County Parkway
Springdale, Ohio 45246

**RE: COMMENTS - WASTE PITS AND PR NATURAL RESOURCE RESTORATION
DESIGN PLAN**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 3, 2005 "Transmittal Of The Waste Pits Area and Paddys Run Natural Resource Restoration Design Plan (20600-PL-0006) Rev 0, DRAFT." Ohio EPA's comments are enclosed.

Should you have any questions, please contact Donna Bohannon or me.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Mark Shupe, GeoTrans, Inc.
Michelle Cullerton, Tetra Tech EM Inc.
Bill Kurey, USFWS

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17. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 5.2.3 Pg #: 5-3 Line #: NA Code: C
 Comment: See previous comments about soil amendment.

18. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 5.4.1 Pg #: 5-4 Line #: NA Code: C
 Comment: This states that seeded areas will be watered for the first six weeks after planting. Please add that they will be watered longer if needed (e.g., drought conditions persist).

19. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: 6.0 Pg #: 6-1 Line #: NA Code: C
 Comment: Implementation monitoring for restoration must persist for a minimum of two growing seasons after planting. Mitigation monitoring requirements for mitigation wetlands are currently under revision but must be for a minimum of five years after installation.

Appendix D

20. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Appendix D Pg #: NA Line #: NA Code: C
 Comment: No specifications are included for bat roosts, yet the narrative indicates they will be provided for the Indiana bat.

Drawings

21. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Drawings Pg #: NA Line #: NA Code: C
 Comment: As indicated above, it is not clear what the static water levels will be nor what the flow will be under specific flow regimes. This needs to be included (for example the flow in/out of the pond in Pit #4 is difficult to follow under various conditions).

22. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Drawings Pg #: NA Line #: NA Code: C
 Comment: It is not clear why the armoring on the outlet from Pit #2 to Pit #3 stops. It appears as though it should either not be there at all, or continue along the entire flow path between pits.

23. Commenting Organization: Ohio EPA Commentor: DSW
 Section #: Drawings Pg #: NA Line #: NA Code: C
 Comment: The drawings call for Ring Buoys. It is not clear why. If these are indeed

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installed, provisions for maintenance must be included (i.e., in the LMIC).

24. Commenting Organization: Ohio EPA
Section #: Drawings Pg #: NA Line #: NA

Commentor: DSW
Code: C

Comment: Although the narrative and specification call for coir matting, the drawings call for C350 or approved equals. We, once again, cannot approve this material as indicated. Not only are better alternatives available (e.g., coir) but previous installations have shown that these do not allow vegetation to grow through them. The recent installation at the SSOD shows the dramatic difference between the biodegradable matting and the C350, where no vegetation is growing up through the C350 and there is abundant vegetation through the adjacent biodegradable matting.