

Rec'd 12-1-06



State of Ohio Environmental Protection Agency

Southwest District

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Bob Taft, Governor
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November 29, 2006

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

Re: Disapproval – Contract DE-AC24-01OH20115, Transmittal of Natural Resource Restoration Statement of Completion Former Production Area Phase II

Dear Mr. Reising:

Ohio EPA has reviewed DOE's October 19, 2006 submittal of the "Contract DE-AC24-01OH20115, Transmittal of Natural Resource Restoration Statement of Completion Former Production Area Phase II (DOE-0019-07)." Ohio EPA's comments are attached.

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
Michelle Cullertn, Tetra Tech EM Inc.
Dave DeVault, USFWS

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**Contract DE-AC24-01OH20115, Transmittal of Natural Resource Restoration
Statement of Completion Former Production Area Phase II**

Comments:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section #: NA Pg #: NA Line #: NA Code: C
Comment: As with other restoration projects, monitoring requirements have not yet been established in an approved NRRP. However, in the NRRP as proposed, the monitoring requirements have not been completed. Until the NRRP is finalized and the appropriate monitoring completed, the project cannot yet be considered complete.
2. Commenting Organization: Ohio EPA Commentor: DSW
Section #: NA Pg #: NA Line #: NA Code: C
Comment: Although the statement is made that slopes were to be 5:1 where possible, there is no way to check the final slopes from the submittal. As built drawings should be included to show details.
3. Commenting Organization: Ohio EPA Commentor: DSW
Section #: NA Pg #: NA Line #: NA Code: C
Comment: The deviations from the design are noted in the narrative, however the areas referenced on the accompanying figures cannot be located in all cases. For example two references are made to Area DA 4BPI, but these cannot be readily seen. More detail is needed in the drawings.
4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: NA Pg #: NA Line #: NA Code: C
Comment: It also appears as though this project has also not completed the certification process. It is unclear how a restoration project can be complete prior to certification.