



05-17-06 11:44 IN

State of Ohio Environmental Protection Agency

Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

TELE: (937)285-6357 FAX: (937)285-6249
www.epa.state.oh.us

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

May 15, 2006

Mr. Johnny Reising
US Department of Energy
Ohio Field Office
Fernald Closure Project
175 TriCounty Parkway
Springdale, Ohio 45246

RE: COMMENTS - SILOS AREA NRRDP

Mr. Reising,

Ohio EPA has received DOE's Silos Area Natural Resource Restoration Design Plan, Final, Rev 0 dated March 31, 2006. Ohio EPA has reviewed this document and our comments are enclosed.

If there are any questions, please contact me or Donna Bohannon.

Sincerely,

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

cc: Jim Saric, U.S. EPA
Michelle Cullerton, Tetra Tech Inc.

Silos Area NRRDP, Final, Rev 0

General Comment:

1. Commenting Organization: Ohio EPA Commentor: OFFO
Section#: General Pg#: NA Line#: NA Code: C
Comment: It is unclear how this project is being integrated with the ongoing design efforts by UC to develop the MUEF. The plan should be revised to specifically point out issues of coordination and hold points for incorporation of UC concepts. An example of this might include how the proposed wetland treatment system would be incorporated into the surrounding restoration. Or how the proposed parking lot could be developed in a more environmentally friendly way with less impervious surface and heat signature. Similarly the figures show trail heads at the MUEF location but do not extend those trails into the restoration areas. It would be inappropriate and wasteful to conduct restoration activities that would limit the MUEF design or need to be destroyed to make way for MUEF design. A more clear approach to integration is needed.

Comments:

2. Commenting Organization: Ohio EPA Commentor: OFFO
Section#: 1.0 Pg#: 1-1 Line#: NA Code: C
Comment: The document states that DOE's approach for "ecological restoration" at Fernald are outlined in the Natural Resource Restoration Plan (DOE 2002) and that the Silos Area will be "consistent with the sitewide restoration goals." What this document fails to point out is that the NRRP has not been finalized nor approved by the Agencies. Therefore, any restoration projects cannot yet be considered complete.

3. Commenting Organization: Ohio EPA Commentor: OFFQ
Section#: 3.1.1 Pg#: 3-1 Line#: NA Code: C
Comment: In case the Silos Treatment Pad and Tank Transfer Pad cannot be established clean and the pads must be removed, DOE suggests that "additional wetland acreage could be created" within the pad's footprint. However, DOE should have a backup contingency plan in place and ready for the Agency's review should a new wetland need to be developed in the pad's footprint.

4. Commenting Organization: Ohio EPA Commentor: DSW
Section #: 4.2 Pg #: 4-2 Line #: NA Code: C
Comment: It is stated that "The slopes of the basins will be graded to no more than 5:1". It is assumed that this means the side slopes. Side slopes are preferred to have as shallow a slope as possible, with at least one side being approximately 15:1. Likewise, the bottom of wetland basins should have a gentle slope rather than being sharply sloping or completely flat.

