



State of Ohio Environmental Protection Agency

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September 6, 2007

Ms Jane Powell
Fernald Site Mgr
DOE-LM-20.1
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

RE: COMMENTS - JUNE 2007 INSPECTION CHECKLIST FOR THE OSDF

Ms Powell:

Ohio EPA has received DOE's "Transmittal of the June 2007 Inspection Checklist for the On-Site Disposal Facility," dated August 13, 2007. Ohio EPA has reviewed the report and our comments are enclosed.

If there are any questions, please contact me.

Sincerely,

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

Cc: Jim Saric, US EPA
Tim Fischer, US EPA
Michelle Cullerton, Tetra Tech Inc.
Mark Shupe, Geo Trans Inc

Q:\femp\Fernald Preserve Post Closure File\OSDF Quarterly Inspections\June07Cmts.doc

COVER LETTER

7. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Cover Letter Page: 1 Line: 3rd paragraph Code: C
Comment: The first sentence of the third paragraph notes that erosion areas on Cells 7 and 8 were "repaired and seeded just prior to the June 20, 2007 inspection." Repair of these areas was in progress during the inspection and new repair areas were flagged during the inspection.

8. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Cover Letter Page: 2 Line: last paragraph Code: C
Comment: The 7th sentence of the last paragraph notes that erosion areas on Cells 7 and 8 were "completed just prior to the June 2007 inspection." Again, repair of these cells was in progress during the inspection and new repair areas were flagged during the inspection.

SPECIFIC CHECKLIST COMMENTS

9. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 1 Line: 2B Code: C
Comment: Delete the portion of item 2B that refers to Certified and Restored Area signage. It appears to be carryover from a different checklist and is not relevant.

10. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 1 Line: 2B Code: C
Comment: Verification of signs and their condition did not occur during the inspection. Please include the date when this was conducted in the Comment Section. In addition, Item 2B states "some signs are not installed at this time." Please clarify (clarification needs to be in the Comment Section).

11. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 1 Line: 2C Code: C
Comment: Item 2C states that the "State of Ohio Regulations" for noxious vegetation is attached to the report. There was no attachment.

12. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 1 Line: 3A Code: C
Comment: The first sentence of item 3A says to "(see attached map)". No map was attached with this report.

13. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 1 Line: 3C Code: C
Comment: Item #2 of the comments states "Herbicide treatment of cut vegetation will take place in late summer or early fall." It is the opinion of Ohio EPA that such treatments are most effective when applied immediately after the cut.

14. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 2 Line: 4A1 Code: C
Comment: Cells 7 and 8 each received and "A" or "Satisfactory" rating. Ohio EPA would rate the deep and excessive erosion rills on these two cells "U" or "Unsatisfactory". Many new erosion rills were noted and some marked during the inspection.

15. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 3 Line: 4B2 Code: C
Comment: Again it is the opinion of Ohio EPA that such herbicide treatments are most effective when applied immediately after the cut.

16. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 3 Line: 4D2 Code: C
Comment: A large band on the south side of Cell 8 did not receive broadcast seeding at the time of closure and was recently re-seeded. Cell 8, and in particular the middle of the south side, had many areas of little to no vegetation. Any vegetation that was there was weedy invasives and not grass. The Condition for Cell cap 8 should be U or unsatisfactory rather than A (satisfactory).

17. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 3 Line: 4D2 Code: C
Comment: Cell 5 was sparsely vegetated with grass on the west side. There was evidence of woody vegetation. Cell 5 should receive a U for item 4D2. Additionally, the maintenance of these items need to be followed up on, including what was done and when it was performed.

18. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 3 Line: 4D3 Code: C
Comment: There was evidence of recent "spot-spray" for thistle. Many natives were adversely affected and wilting from this herbicide, including Black-eyed Susan, Grey-headed Coneflower and Aster. This should be noted in the comments.

19. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 4 Line: 6E Code: C
Original Comment#:

Comment: Add that Cells 7 and 8 had numerous protruding staples from the matting that need to be stomped.

20. Commenting Organization: Ohio EPA Commentor: OFFO
Section: Checklist Page: 4 Line: 6E Code: C
Comment: It also should be noted that a newly installed boardwalk and mowed path to the top was added on the east side at Cell 7.