



State of Ohio Environmental Protection Agency

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September 7, 2007

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

**RE: COMMENTS - TRANSMITTAL OF THE JUNE 2007 FERNALD SITE  
INSPECTION CHECKLIST**

Ms Powell:

Ohio EPA has received DOE's "Transmittal of The June 2007 Fernald Site Inspection Checklist," 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  
Michelle Cullerton, Tetra Tech Inc.  
Tim Fischer, US EPA

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**OHIO EPA COMMENTS  
FERNALD SITE INSPECTION - JUNE 2007**

**General Comments on the Site Inspection:**

1. Commenting Organization: Ohio EPA Commentor: OFFO

Section: General Page: Line: Code: C

Comment: The June 2007 Fernald site inspection seemed to go more smoothly than the first one. However, there are still some major improvements that can be made to the process to allow for a better assessment of the site. In addition, several major issues have not been resolved from last inspection. This goes back to refining the inspection follow-up and information sharing.

2. Commenting Organization: Ohio EPA Commentor: OFFO

Section: Aerial Map Page: Line: Code: C

Comment: One improvement made to the second inspection included the aerial map. The aerial was recent and gave a better representation of the site and marking locations of findings seemed to be a little more accurate. Since the maps were divided into 4 quadrants, it did make it difficult to handle in the field and switch between them, but better than the first inspection.

**Recommendation:** Include well locations on the aerials. The wells should be in place for a long time and may allow for quick referencing of location on the map.

3. Commenting Organization: Ohio EPA Commentor: OFFO

Section: General Page: Line: Code: C

Comment: It was difficult to navigate and inspect areas of dense brush and high vegetation like the Northern Woodlot, A1P1 wetlands, and Northern Pines. If debris had been found and flagged, it would have been hard to relocate. In addition, it was hard to stay on target, which resulted in criss-crossed paths and thus covering less ground.

A better approach would be to target specific areas of the site for inspection, during certain times of the year when these areas are easily accessed. Highly vegetated areas might be best inspected annually or twice a year; in the fall or winter and/or possibly spring. This would allow for easier hiking and more visibility for locating debris.

4. Commenting Organization: Ohio EPA Commentor: OFFO

Section: General Page: Line: Code: C

Original Comment#:

Comment: Debris and other findings should both be uniformly flagged/dated in the field, marked on the maps and tracked on a spreadsheet as to what was done and when. Develop some system such as: a yellow flag in the field should be marked with an "R" on the map to indicate "rad"; a purple flag in the field might indicate "invasive" and would be marked with an "I" on the map; and so on. Follow up with a spreadsheet to indicate when and how these items were addressed. Using this approach would ensure finding the location in case the flag disappeared and allow Stoller to clean up general trash and construction debris quicker.

5. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: General Page: Line: Code: C  
Comment: Again, the cover letter seems to make up the bulk of the report.  
Incorporating everything into one document would make it seem more like a report.

6. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: General/vegetation growth Page: Line: Code: C  
Comment: Some areas are still having a difficult time with vegetation growth. DOE and Stoller should develop a standardized system to rate percentage of vegetative cover in a given area.

7. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: General/Paddys Run Creek Page: Line: Code: C  
Comment: Paddys Run Creek bed should be considered a top priority for inspection since a lot of debris has been found in the creek bed over the years. In addition, this area is easy access for vandals.

**Recommendation:** The creek bed needs to be walked at least twice a year. This would ensure catching all debris and other findings that may wash into the creek, and items that may emerge from storms and freeze/thaw conditions over the year. In addition, it was realized that during the last inspection no one had walked down the full length of Paddys Run Creek.

8. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: General/Erosion Page: Line: Code: C  
Comment: Erosion is another priority. Some type of mechanism is needed to track, evaluate, and document repair progress of an eroding areas over time. The Agencies should be routinely informed on the progress especially, large erosion issues at the site (WPs & SWU).

**Specific Comments/Observations on the Site Inspection:**

9. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/Erosion Page: Line: Code: O (observation)  
Comment:  
a) SWU: Erosion from the area into Paddys Run is evident from the delta of sediment in the stream adjacent to SWU. The gradient control structure is definitely working to increase the height of the stream bed.  
b) Oxbow area: Lots of erosion fence not doing anything but looking bad around the area which should be removed.

10. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/Invasives Page: Line: Code: O  
Comment: In the Oxbow Area, Japanese knotweed is getting a foothold at the bottom of the slope.

11. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/ Former Prod Area Page: Line: Code: C  
Comment: The Former Production Area was the least vegetated and had the most debris and trash. Suspect debris was common as well as construction debris. Trash was abundant throughout. A military style police call (line up people with trash bags and have them pickup anything that doesn't belong there) may be a quick method to get this area looking like a nature preserve.

12. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/ Northern Pines Page: Line: Code: O  
Comment: From a debris and trash point of view, this area looked good. However, garlic mustard, honeysuckle, and phragmites(sp?) have either already established themselves or will be establishing soon.

13. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/ A1P1 Wetlands Page: Line: Code: O  
Comment: North walking south, the pools was at low water but all weirs, dams, and structures looked good. This area also had some mature trees with tree tubes that could be removed for aesthetic reasons, as long as there is no possibility of deer browsing. Many old unused tree tubes are scattered throughout the wetland.

14. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Specific/ Burrow Area Page: Line: Code: C  
Comment: Walked along the slope going downward into the excavated area and finished up transecting the toe. Notes were taken on noxious weeds and debris. Many wire tree fences were knocked over and need to be removed or re-staked. Some debris was flagged and dated.

#### **Specific Comments on the Transmittal Checklist:**

15. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Cover ltr Page: first Line: third paragraph/2<sup>nd</sup> sent Code: C  
Comment: This statement contradicts the information on the enclosed map. The text states that fencing and signs are in good condition. However, the map states that some of the fencing and signage is in need of repair.

16. Commenting Organization: Ohio EPA Commentor: OFFO  
Section: Cover ltr Page: first Line: third paragraph/4<sup>th</sup>&5<sup>th</sup> sent Code: C  
& 6<sup>th</sup> paragraph/8<sup>th</sup> sent  
Comment: Text states that a "number of findings was observed" and the "documentation" are presented in the cover letter. However, debris findings have been left out. Ohio EPA doesn't follow the logic of why Stoller has decided to leave debris findings out of the report and the locations of the debris not included on the map. Finding debris at Fernald will be an on-going process, probably for several years. It is important to come up with some type of method to document and log where and what has been found onsite and when it was removed. If there is an existing process in

