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State of Ohio Environmental Protection Agency

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October 31, 2007

Ms. Jane Powell
US DOE-LM-201
10995 Hamilton Cleves Hwy
Harrison, Ohio 45030

RE: COMMENTS - TRANSMITTAL OF THE SEPTEMBER 10, 2007 INSPECTION CHECKLIST FOR OSDF

Ms. Powell:

Ohio EPA has received DOE's "Transmittal of the September 10, 2007 Inspection Checklist For On-Site Disposal Facility," dated October 2, 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
Ohio EPA Federal Facilities

Cc: Tim Fischer, US EPA
Michelle Cullerton, Tetra Tech
Frank Johnson, Stoller
John Homer, Stoller

File: Q:\Fernald Post Closure Inspections\OSDF Quarterly\September07OSDFcmts.doc

**OHIO EPA COMMENTS
OSDF INSPECTION - SEPTEMBER 10, 2007**

TRANSMITTAL LETTER

1. Commenting Organization: Ohio EPA Commenter: FF
Section: Letter Pg#: 1 Line#: second paragraph Code: C
Comment: First sentence in the second paragraph of the OSDF Inspection Checklist letter states that the vegetative cover on Cells 7 & 8 "continues to progress very well." Ohio EPA does not interpret Cells 7 & 8 vegetative growth as progressing very well. During Ohio EPA's inspection of Cell's 7 & 8 caps there was an abundant amount of Pigweed covering Cell 7's west side. Cell 8 was about 80% covered with Pigweed. This Pigweed should be cut and removed before going to seed or herbicide application should be made.

2. Commenting Organization: Ohio EPA Commenter: FF
Section: Letter Pg#: 2 Line#: first paragraph Code: C
Comment: In addition to several rills noted on Cells 7 & 8, Ohio EPA also noticed 2 large rills that begin going up slope on the west side of Cell 5 near the toe. OEPA placed a flag at that location.

3. Commenting Organization: Ohio EPA Commenter: FF
Section: Letter Pg#: 2 Line#: second paragraph Code: C
Comment: Please include as an attachment the punch list used by maintenance personnel to address findings from the inspections.

4. Commenting Organization: Ohio EPA Commenter: FF
Section: Letter Pg#: 2 Line#: first paragraph Code: C
Comment: The word 'quadrant' is misspelled throughout letter and on checklist.

OSDF CELL CAP POST CLOSURE INSPECTION CHECKLIST

5. Commenting Organization: Ohio EPA Commenter: FF
Section: Checklist Pg#: 1 Line#: Items 1-3, 5, 6B, 6C Code: C
Comment: Ohio EPA did not participate in this part of the inspection nor was Stoller observed conducting it. The report/checklist should reflect when these inspections were conducted.

6. Commenting Organization: Ohio EPA Commenter: FF
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.

7. Commenting Organization: Ohio EPA Commenter: FF
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 is no such attachment.

8. Commenting Organization: Ohio EPA Commentor: FF
Section: Checklist Pg#: 1 Line#: 3A Code: C
Comment: There is no map attached to the OSDf report. Additionally, this inspection item did not occur on 9/10/07 and the date should be noted as to when this was inspected.

9. Commenting Organization: Ohio EPA Commentor: FF
Section: Checklist Pg#: 3 Line#: Items 4D1 Code: C
Comment: The condition of Cell 1 should be marked with a "U", not an "A." The majority of the grass cover on Cell 1 was dead resulting from herbicide damage. Even though it is known that the herbicide is what caused the damage, and the vegetation is expected to recover, the column should reflect current conditions and thus be marked with a "U" for Cell 1. This should be explained in the "comments column."

10. Commenting Organization: Ohio EPA Commentor: FF
Section: Checklist Pg#: 3 Line#: Items 4D1 Code: C
Comment: The condition of Cell 8 cap also showed signs of being stressed and bare areas without vegetation. The little vegetation on Cell 8 was Pigweed; this is not a healthy grass cover. Again, Cell 8 should be marked with a "U" and not an "A," and a comment made in the corresponding column.

11. Commenting Organization: Ohio EPA Commentor: FF
Section: Checklist Pg#: 3 Line#: Items 4D2 Code: C
Comment: Cell 5 cap did not have adequate coverage/density. There is a large patch on top of the cell where plants were obviously dead. For Item 4D2, Cell 5 should be marked with a "U" and not an "A". A notation should be made in the comments column.

12. Commenting Organization: Ohio EPA Commentor: FF
Section: Checklist Page: 4 Line: 6E Code: C
Comment: Add that Cells 7 and 8 had numerous protruding staples from the matting that need to be stomped.